

## Environmental Release to Construction for Environmental Evaluations

### SUMMARY

This standard applies to the Environmental Release to Construction (ERTC) prepared prior to implementation of PG&E operations and maintenance (O&M) or construction activities. The ERTC catalogs all activity-specific permits, agreements, authorizations, and other environmental requirements that are managed by the Environmental Management team. The ERTC is used to inform personnel of activity-related requirements and helps ensure that the activity complies with applicable federal, state, and local laws and internal environmental guidance.

Project activities that have the potential to impact the environment (e.g., ground disturbance, impact to protected species, water, coastal resources, public trust resources, waterways or wetlands, air quality, cultural resources, work on public or tribal lands and/or generation of hazardous waste) shall be reviewed and released by the Environmental Management team prior to O&M or construction work occurring.

### TARGET AUDIENCE

This standard applies to all personnel involved in planning, scheduling, reviewing, permitting, implementing, and inspecting O&M or construction activities that require an ERTC.

### TABLE OF CONTENTS

SUBSECTION	TITLE	PAGE
1	Roles and Responsibilities .....	1
2	ERTC Process .....	2
3	Governance .....	4

### REQUIREMENTS

#### 1 Roles and Responsibilities

- 1.1 PG&E's Environmental Management organization is responsible for communicating this standard and updates to this standard to the appropriate audience within PG&E.
- 1.2 The Line of Business (LOB) is responsible for complying with all applicable federal and state and/or local environmental/cultural regulations, requirements or permits outlined in the ERTC.
- 1.3 Environmental Management will assist in identifying necessary deliverables from other support organizations (e.g. Land Management) and will collaborate with those support organizations as needed to ensure execution (i.e. acquisition of ministerial permits, land rights).

## Environmental Release to Construction for Environmental Evaluations

### 2 ERTC Process

- 2.1 All PG&E personnel, including contractors, responsible for planning, estimating, engineering, or managing O&M or construction activities must initiate the ERTC process. A change to the scope of work (e.g. a change in work location, work methods, and materials) or to the construction schedule during or after ERTC process may trigger another review to determine whether new or updated permits, agreements, or authorizations are required and/or whether a new or updated ERTC is required. Utility Procedure [ENV 10002P-01, "Environmental Release to Construction for Environmental Evaluations Procedure"](#) provides the specific actions that need to be completed as part of the ERTC process.
- 2.2 IF work fits the definition of an Emergency Project/Activity (referenced in the definition section),  
  
THEN refer to Utility Procedure [ENV-8003P-01, "Environmental Permitting Procedure for Emergency Projects"](#) and follow the outlined steps.
- 2.3 There are four stages to the ERTC process:
  1. Intake:
    - a. The LOB is responsible for submitting the project environmental review request to Environmental Management with all applicable project information available.
    - b. Environmental Management personnel manages project environmental review requests in the Salesforce project application, which ensures a centralized management of the environmental review and a comprehensive database of projects. Project input may be manual or through automated intake form.
  2. Review:
    - a. Environmental Management personnel is responsible for requesting from LOB all project-specific information necessary to conduct an environmental review. LOB is responsible for providing all necessary information.
    - b. Environmental Management personnel is responsible for conducting the environmental review, assessing the need for permits and approvals, approximating timelines, and communicating with the LOB as appropriate.
  3. Develop:
    - a. Environmental Management personnel is responsible for developing project permitting strategy, securing necessary environmental and resource permits and public land management agency approvals; other support groups (e.g. Land Management) are responsible for other authorizations (i.e. ministerial permits, land rights).

## Environmental Release to Construction for Environmental Evaluations

- b. Environmental Management personnel is responsible for ensuring all necessary compliance guidance is provided in the ERTC (e.g. AMMs, BMPs, stormwater requirements, permit conditions, etc.) and that copies of all relevant permits are included in the ERTC as applicable.
  - c. Environmental Management personnel is responsible for determining if additional construction support or ERTC inspection as needed (e.g. tailboards, training, monitoring, permit compliance activities).
4. Release:
- a. Environmental Management personnel is responsible for issuing the approved ERTC and attachments to the LOB.
  - b. LOB's final job package will include a copy of the ERTC and attachments. All LOB and Environmental Management personnel (internal and contract employees) involved in managing, scheduling, overseeing, or inspecting O&M or construction activities must:
    - (1) Read, review, and understand the ERTC document and attachments;
    - (2) LOB to communicate the ERTC requirements to all involved personnel, including field personnel;
    - (3) LOB to ensure all personnel understand the ERTC requirements prior to any activity during a preconstruction meeting or onsite tailboard;
    - (4) LOB to keep a hard copy of the complete ERTC on the site for the duration of the activity in a location known by all field personnel and other appropriate project personnel; and
    - (5) LOB to ensure that field personnel and other appropriate project personnel comply with the ERTC document, instructions and conditions, and implement all activity requirements, such as permit conditions, Best Management Practices (BMPs), and Avoidance and Minimization Measures (AMMs).
    - (6) Should the project scope change after issuance of the ERTC, the LOB will contact Environmental Management personnel and provide applicable information. Environmental Management personnel is responsible for conducting the environmental review, assessing the need for modified permits and approvals, as appropriate, and issuing an ERTC variance or updated ERTC as appropriate.
  - c. After project completion, the LOB is responsible for maintaining the complete ERTC according to the applicable PG&E document retention policies.

## Environmental Release to Construction for Environmental Evaluations

- d. If construction and/or post construction support or reporting are necessary and an ERTC inspection to be performed, the LOB is responsible for communicating to Environmental Management that the work is complete and Environmental Management personnel is responsible for conducting the inspection and working with the LOB, as appropriate, to address any non-compliance issues. Environmental Management personnel is responsible for documenting the issues and their resolution in Salesforce.
- e. Environmental Management personnel is responsible for finalizing the project record in the system of record (e.g. Salesforce), close out of permits, conduct post-work notifications as applicable once work is completed and all non-compliance issues (if any) have been addressed.

### 3 Governance

3.1 Environmental Management personnel is responsible for completing an annual review of the following:

1. Environmental Management's adherence to this Standard and Utility Procedure [ENV 10002P-01, "Environmental Release to Construction for Environmental Evaluations Procedure"](#) to ensure environmental reviews are consistent and repeatable.
2. Project pre-screening processes (e.g. AEA [Automatic Environmental Assessment] boundaries, CEQA [California Environmental Quality Act] checklists, etc.) for completeness and accuracy.

### END of Requirements

### DEFINITIONS

**Emergency Project:** A project or activity which includes but is not limited to emergency repairs to facilities necessary to maintain service essential to the public health, safety, or welfare.

Emergency repairs include those that require a reasonable amount of planning where delay of project or activity would result in significant safety or environmental impacts. Furthermore, emergency projects include specific actions necessary to prevent or mitigate an emergency.

Emergency projects or activities do not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term.

**Environmental Impact:** Impacts include, but are not limited to, ground disturbance; impact to protected species; impacts to water, waterways or wetlands; impacts to air quality; impacts to cultural resources; work on public or tribal lands; and potential impacts associated with the generation of hazardous waste and storage of hazardous materials.

**Environmental Management:** Environmental Management Transmission, Environmental Management Generation, Environmental Management Distribution and Shared Services.

## Environmental Release to Construction for Environmental Evaluations

**Environmental Release to Construction (ERTC):** The ERTC is the document used to inform personnel of activity-related requirements managed by Environmental Management that need to be implemented to comply with applicable federal, state, and local laws and internal environmental guidance. This document must be kept on the site for the duration of the activity in a location known by all field personnel and other appropriate project personnel.

**Line of Business:** PG&E's various business lines such as but not limited to: Electric Operations, Gas Operations, Generation, DCP, Safety, Shared Services, and IT.

**Operations & Maintenance and Construction Activity:** All physical onsite activities covered in the work description or scope. This applies to any type of work performed by PG&E employees or other personnel and ranges from major construction activities to minor maintenance activities. This includes, but is not limited to, pre-construction activities; work in access areas and lay-down yards; clearing the right of way; removing trees or other vegetation; potholing, demolition or modification of buildings or equipment; pole/tower removal or replacement; reconductoring; trenching; drilling; boring; or any other activity on or near the site that would not occur if it were not for the activity.

**Project:** The O&M activity or construction activity which requires environmental evaluation.

### IMPLEMENTATION RESPONSIBILITIES

The Senior Director of Environmental Management ensures the relevant EM personnel and LOB leadership receive a communication on this standard.

### GOVERNING DOCUMENT

[ENV-01. "Environmental Policy"](#)

### COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

#### Records and Information Management:

PG&E records are company assets that must be managed with integrity to ensure authenticity and reliability. Each Line of Business (LOB) must manage Records and Information in accordance with the Enterprise Records and Information (ERIM) Policy, Standards and Enterprise Records Retention Schedule (ERRS). Each Line of Business (LOB) is also responsible for ensuring records are complete, accurate, verifiable and can be retrieved upon request. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard"](#) for further records management guidance or contact ERIM at [Enterprise\\_RIM@pge.com](mailto:Enterprise_RIM@pge.com).

#### Code of Conduct

- Code of Conduct: Compliance Obligations
- Code of Conduct: Compliance Standards

#### Supplier Code of Conduct

**Environmental Release to Construction for Environmental Evaluations**

The ERTC process ensures all applicable federal, state, and local environmental permits have been acquired, and BMPs and AMMs have been provided.

**REFERENCE DOCUMENTS**

**Developmental References:**

[ENV-8003P-01, "Environmental Permitting Procedure for Emergency Projects"](#)

**Supplemental References:**

NA

**APPENDICES**

NA

**ATTACHMENTS**

NA

**DOCUMENT REVISION**

Supersedes ENV-10002S, Revision 3

**DOCUMENT APPROVER**

██████████, Senior Director, Environmental Management

**DOCUMENT OWNER**

██████████, Director, Environmental Management

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**REVISION NOTES**

Where?	What Changed?
Throughout document	Shift in focus from Land and Environmental Management roles/processes to just EM. Land rights removed as a trigger for project review/release. Added references to the use of Salesforce for managing project records. General updates and clarification of enterprise-wide requirements.