

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: November 6, 2025

TO: Zoning Hearing Officer

FROM: Planning Staff

SUBJECT: Consideration of a Use Permit Amendment, a Coastal Development Permit, a Resource Management District Permit, and a Grading Permit, pursuant to Sections 6500, 6328, and 6313, respectively, of the County Zoning Regulations, and Section 8600 of the San Mateo County Ordinance Code, to upgrade the existing Landfill Gas-to-Energy facility by installing a seventh engine generator set at the existing Ox Mountain landfill facility, in the unincorporated Half Moon Bay area of San Mateo County. The project is appealable to the California Coastal Commission. In conjunction with the requested permits, it is recommended that the Zoning Hearing Officer determine that the project is exempt pursuant to the California Environmental Quality Act, under Section 15061(b)(3)), the General Rule Exemption.

County File Number: PLN2005-00469 (Ameresco)

PROPOSAL

The applicant, Ameresco Half Moon Bay, LLC (Ameresco) is proposing to modify an existing Landfill Gas-to-Energy (LFGTE) facility located within the Corinda Los Trancos Sanitary Landfill at Ox Mountain and operated by Browning-Ferris Industries (BFI). The facility diverts collected landfill gas (approximately 50% methane, a byproduct of decomposing municipal solid waste) from being incinerated via enclosed flare units on the landfill site. The existing LFGTE facility captures the diverted landfill gas to power six gas engine generators to create 11.4 Megawatts (MW) of electricity used by the cities of Alameda and Palo Alto. The LFGTE facility has been in operation since 2009, producing 276 MW-hours of green renewable electrical power per day, which is equivalent to the electrical use of 7,000 households.

The LFGTE facility is located at the existing upper canyon flare station and includes an electrical substation approximately 300 feet to the south of the LFGTE facility, and approximately 1.1 miles of above-ground transmission lines supported by 30-foot-high single poles. The upper canyon flare station, where the LFGTE facility and substation are located, is at the northern end of the Corinda Los Trancos Canyon.

Ameresco proposes to upgrade the LFGTE facility by installing a seventh engine generator set. The facility building was originally designed with room to add a 7th generator set so the required genset, wiring and electrical gear will be installed inside the current LFGTE plant building. The expanded facility will consume additional landfill gas which is currently flared onsite by the landfill requiring additional gas pre-treatment systems to be installed. The proposed additional equipment includes a H2S reduction system, additional Temperature Swing Adsorption (TSA) units to remove siloxanes from the landfill gas, additional gas coolers, a chiller upgrade, and an additional enclosed flare to destroy waste gases from the TSA system.

The equipment will be manufactured offsite and skid mounted to allow easy installation. The gas treatment equipment will be installed outdoors in the existing LFGTE plant gas treatment yard with a limited amount of earthwork to excavate the hillside and install retaining walls for additional space. All grading will be done in areas which were previously disturbed as part of the landfill and LFGTE facility construction. The project will also involve grading of approximately 418 cubic yards of excavation, and 38 yards of fill. The cut material will be used by BFI for use with their landfill operations.

As part of the project, the existing fire hydrant will be moved approximately 200 feet closer to the entrance of the facility, as agreed by the Coastside Fire Protection District, to provide enough space for the H2S system and provide easier access to the hydrant. No road modification would be needed.

The project will be built in two separate phases as described below:

- Phase I: The H2S Reduction System consisting of four removal vessels and associated piping is expected to be installed in early 2026 once permitted. Ameresco has submitted an air permit application to BAAQMD for this equipment and received a Temporary Permit to Operate No. 696104 on February 26, 2024, for this system.
- Phase II: The installation of the new engine generator and other associated gas processing equipment will follow approximately a year later once the equipment is ordered and received. Ameresco submitted an Authority to Construct Application to the BAAQMD on April 1, 2024.

The proposed project as described requires an amendment of the existing Use Permit of the landfill facility.

RECOMMENDATION

Approve the Use Permit Amendment, Coastal Development Permit, Resource Management District Permit, and Grading Permit by making the required findings and adopting the conditions of approval listed in Attachment A.

BACKGROUND

Report Prepared By: Camille Leung, Project Planner, cleung@smcgov.org

Owner: Browning Ferris Industries Inc.

Applicant: Alan Siegwarth, Director of Engineering, Ameresco

Location: 12310 San Mateo Road (State Route 92); 3 miles northeast of Half Moon Bay

APNs: 048-350-070 (Subject Parcel); associated parcels 048-350-060; 056-360-020, -040, -240, -300; 056-530-010

Parcel Size: BFI's property totals approximately 2,786 acres.

Existing Zoning: RM-CZ (Resource Management-Coastal Zone)

General Plan Designation: Open Space

Existing Land Use: Solid waste landfill facility and open space

Environmental Evaluation: This project is exempt pursuant to the California Environmental Quality Act, under Section 15061(b)(3)), the General Rule Exemption.

Public Notification: Ten-day advanced notification for the hearing was mailed to property owners and residents of property located within 300 feet of the project parcel and a notice for the hearing posted in the San Mateo County Times, a newspaper of general public circulation.

Setting/Existing Land Use: Located on the westerly slopes of the Santa Cruz Mountain Range, the topography at Ox Mountain is generally steep, consisting of a series of ridges and canyon. Corinda Los Trancos Canyon has natural side slopes averaging from 20 to 50 percent and elevations from 300 to 1,000 feet. BFI has operated the existing landfill facility within Los Trancos Canyon since 1965. An expansion of BFI's operation occurred in 1991 and 1999 that involved further excavation within the canyon which extended the lifetime of the landfill until 2038. The landfill boundaries remain confined within the canyon, which accounts for a total of 184 acres. The subject site of the proposed project is located inside the northeastern ridge of the canyon near the ridge. Currently at the subject site, the upper flare station to the landfill is located on the slope of the Corinda Los Trancos canyon.

Chronology:

<u>Date</u>	<u>Action</u>
September 7, 2006	- Zoning Hearing Officer approves permits for construction of the Landfill Gas-to-Energy facility.
May 13, 2024	- Subject application submitted that included one new engine and replacement of Engine 1 with a larger engine.
March 11, 2025; April 23, 2025	- Meetings with County staff and BAAQMD staff regarding use of CEQA Class 29 (Cogeneration Projects at Existing Facilities) exemption, for the originally proposed project that included replacement of Engine 1 with larger engine. BAAQMD expresses concerns that the larger engine would result in potential project air impacts (including generation of formaldehyde and carbon monoxide criteria pollutants). The applicant agrees to revise the proposal to remove the request for the larger engine. Staff receives email correspondence between the applicant and County Health Department's Environmental Health division staff regarding recent exceedances for methane at the landfill site, especially during LFGTE facility downtimes, and how those can be addressed.
July 23, 2025	- Based on an agreement with the applicant to revise the project, BAAQMD staff agrees the use of the General Rule CEQA Exemption is appropriate.
September 5, 2025	- Applicant submits revised plans to add only one engine and to remove replacement of Engine 1 with larger engine from the project scope to address BAAQMD concerns.
September 15, 2025	- Application deemed complete.
November 6, 2025	- Zoning Hearing Officer public hearing.

DISCUSSION

A. KEY ISSUES

1. Compliance with the General Plan

The applicable policies are discussed as follows:

Visual Resources

Policy 4.21 (*Utility Structures*) and Policy 4.28 (*Ridgelines and Skyline*), which call for minimizing the adverse visual impact a utility structure creates, as well as discouraging development on open ridgelines and skylines. The Landfill Gas-to-Energy (LFGTE) facility is located on the inside face of the canyon, below the top of the ridge. The subject site is not visible from outside of the landfill, including from State Highway 92, State Highway 1, or Half Moon Bay. The project site is not within any scenic corridor.

Solid Waste

Policy 13.6 (*Promote Materials Recovery and Energy Recovery*) and Policy 13.24 (*Locating Waste-to-Energy Facilities*) specifically indicates that facilities such as this proposal are encouraged and should be located on suitably designated lands so long as environmental impacts are mitigated to acceptable levels. The gas treatment equipment will be installed outdoors in the existing LFGTE plant gas treatment yard with a limited amount of earthwork to excavate the hillside and install retaining walls for additional space. All grading will be done in areas which were previously disturbed as part of the landfill and LFGTE facility construction. The project will also involve grading of approximately 418 cubic yards of excavation, and 38 yards of fill. The cut material will be used by BFI for use with their landfill operations.

2. Compliance with Local Coastal Program (LCP)

Staff's evaluation of the proposed project against the policies of the LCP focuses on the expansion of the LFGTE facility rather than the ongoing activities or impacts of the landfill's operations.

LCP Policy 4.32 (*Construction Activities*) requires that access and construction roads should be located to minimize landform alterations. Road grades and alignments should follow the contour of the land with smooth, gradual curves where possible. Access to the proposed site is already provided via an existing service road; no changes to the road are proposed.

LCP Policy 4.42 (*Alternative Energy Sources*) encourages the development of non-polluting alternative energy resources including but not limited to co-generation, biomass, wind and solar. The proposed project is considered a co-generation power source.

3. Compliance with Resource Management-Coastal Zone (RM-CZ) District Regulations

The project site is located within the Resource Management-Coastal Zone (RM-CZ) District. The requirements of the RM-CZ Zoning District necessitate a review of the proposal against criteria outlined in Chapter 36A.2 of the County Zoning Regulations.

The primary criteria found to conform to the relevant criteria as discussed below:

Environmental Quality

Section 6912.1.a: All developments should be designed and located to conserve energy resources and thereby reduce the impacts of energy consumption on air, land, water, and living resources. Such efforts might include the clustering or location of development to reduce paving, grading, runoff, and driving times, and structural designs which maximize use of solar energy and reduce use of electricity and fossil fuels. The existing LFGTE facility captures the diverted landfill gas to power six gas engine generators to create 11.4 MWs of electricity used by the cities of Alameda and Palo Alto, producing 276 MW-hours of green renewable electrical power per day, which is equivalent to the electrical use of 7,000 households. The facility building was originally designed with room to add a 7th generator set so the required genset, wiring, and electrical gear will be installed inside the current LFGTE plant building. The expanded facility would consume additional landfill gas, which is currently flared onsite by the landfill requiring additional gas pre-treatment systems to be installed.

Section 6912.1.b: Standards for emission of air pollutants must be met, for protection of crops, the natural environment, and public health. The applicant is required to secure a permit for the proposed LFGTE facility expansion from the Bay Area Air Quality Management District (BAAQMD) to ensure emissions from the facility are within acceptable tolerance. In reviewing whether the project's CO (carbon monoxide) impacts would remain under the CEQA Thresholds of Significance, BAAQMD staff agreed that the project is exempt under CEQA's General Rule exemption and this project would be unlikely to exceed the CO Threshold of Significance, based on the Half Moon Bay Expansion Permitting Modeling Scale Up letter, dated June 3, 2025, provided by the applicant.

Section 6912.2.i: Wherever possible, vegetation removed during construction shall be replaced. Vegetation for the stabilization of graded areas or for replacement of existing vegetation shall be selected and located to be compatible with surrounding vegetation, and should recognize climatic, soil, and ecological characteristics of the region. Condition 7 requires the replacement of removed vegetation, prior to final planning approval of the building permit for the project.

4. Use Permit Compliance and Requirement for Amendment

Section 6500 of the San Mateo County Zoning Ordinance permits electrical public utility subject to use permit approval. The ongoing Use Permit was last amended in 2006. Staff have found the LFGTE facility to be in compliance with these conditions. Staff has made minor updates to the 2006 conditions to update conditions pertaining to construction of the original to require maintenance of those features, to extend the permit term from five to ten years, and to remove the annual administrative review requirement.

In order to grant this use permit amendment, the Zoning Hearing Officer must find that the proposal will not be detrimental to the public welfare or injurious to property or improvements in the vicinity of the project.

Conditions of approval of the use permit relating to noise, traffic, and public health and safety (Attachment A) are maintained in the permit to ensure that conducting the proposed use will not be detrimental to the public welfare.

The impact of the proposed facility expansion would largely be beneficial in terms of converting methane gas to energy, providing more clean energy to the cities the facility serves. As proposed and conditioned, the facility expansion minimizes grading and would result in less than significant visual and air quality impacts.

5. Grading Regulations

The project will also involve grading of approximately 418 cubic yards of excavation, and 38 yards of fill. The cut material will be used by BFI for use with their landfill operations. The project involves a limited amount of earthwork to excavate the hillside and install retaining walls for additional space. All grading will be done in areas which were previously disturbed as part of the landfill and LFGTE facility construction.

The project has been reviewed by the Geotechnical and Drainage sections of the County's Planning and Building Department, with applicable requirements added as conditions of approval. Staff has reviewed the proposal against the required findings for a grading permit (below) and

concludes that the project conforms to the criteria for review contained in the Grading Ordinance, as outlined below:

a. **That the project will not have a significant adverse effect on the environment.**

The proposed LFGTE facility expansion will be located on previously disturbed soil. As previously mentioned in the Environmental Quality section of the Compliance with Resource Management District analysis, this project will not increase the impact already created by the landfill's operation, which is subject to mitigation measures as required in the 1991 Environmental Impact Report, and 1998 Negative Declaration related to BFI's operation.

b. **That the project conforms to the criteria of the San Mateo County Grading Ordinance and is consistent with the General Plan.**

The project, as conditioned, conforms to the criteria for review contained in the Grading Ordinance, including an erosion and sediment control plan, dust control measures, and required replacement of removed vegetation. As outlined earlier, the project conforms to the General Plan.

6. Additional Permits Required

In addition to the requested County permits, the applicant must obtain permits from other federal, State, and regional agencies. The applicant is in the process of securing permit approval for the project from the Bay Area Air Quality Management District, as required by Condition 8.

B. ALTERNATIVES

In addition to the recommended action, the Planning Commission may choose to continue its review of the project to request additional information; deny the project and identify findings for such denial; or approve the project with amendments to the suggested conditions of approval.

C. ENVIRONMENTAL REVIEW

The proposed LFGTE facility expansion is exempt from environmental review under the "General Rule" exemption, per CEQA Guidelines Section 15061(b)(3)), which applies to projects that are clearly shown to have no possibility of causing a significant environmental effect, even if they don't fit a specific statutory or categorical exemption. This exemption requires a lead agency to provide factual evidence to support its finding of no significant environmental impact.

In reviewing whether the project's CO (carbon monoxide) impacts would remain under the CEQA Thresholds of Significance, BAAQMD staff agreed that the project is exempt under CEQA's General Rule exemption and this project would be unlikely to exceed the CO Threshold of Significance, based on the Half Moon Bay Expansion Permitting Modeling Scale Up letter, dated June 3, 2025, provided by the applicant.

D. REVIEWING AGENCIES

Drainage Section - County Building Inspection Division
Geotechnical Section - County Building Inspection Division
Environmental Health Division of County Health Department
Bay Area Air Quality Management District (BAAQMD)
Midcoast Community Council
Coastside Fire Protection District
California Coastal Commission

ATTACHMENTS

- A. Recommended Findings and Conditions of Approval
- B. Vicinity Map
- C. Plans
- D. Site Photos
- E. 2006 Use Permit
- F. Half Moon Bay Expansion Permitting Modeling Scale Up letter, dated June 3, 2025

County of San Mateo
Planning and Building Department

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN2005-00469

Hearing Date: November 6, 2025

Prepared By: Camille Leung, Senior Planner For Adoption By: Zoning Hearing Officer

RECOMMENDED FINDINGS

Regarding the Environmental Review, Find:

1. The project is exempt from environmental review under the “General Rule” exemption, per CEQA Guidelines Section 15061(b)(3)), which applies to projects that are clearly shown to have no possibility of causing a significant environmental effect, even if they don't fit a specific statutory or categorical exemption.

Regarding the Use Permit Amendment, Find:

2. The proposed expansion of the Landfill Gas-to-Energy facility will not, under the circumstances of this particular case, be detrimental to the public welfare of injurious to property or improvements in the vicinity. Conditions of approval of the use permit relating to noise, traffic, and public health and safety are maintained in the permit to ensure that conducting the proposed use will not be detrimental to the public welfare. The impact of the proposed facility expansion would largely be beneficial in terms of converting methane gas to energy, providing more clean energy to the cities the facility serves. As proposed and conditioned, the facility expansion minimizes grading and would result in less than significant visual and air quality impacts.

Regarding the Coastal Development Permit, Find:

3. That the project, as described in the application and accompanying materials required by Section 6328.7 and as conditioned in accordance with Section 6328.14, conforms to the plans, policies, requirements and standards of San Mateo County Local Coastal Program, including LCP Policy 4.32 (*Construction Activities*) and LCP Policy 4.42 (*Alternative Energy Sources*), as discussed in the staff report.

4. The project is not located between the nearest public road and the sea, or the shoreline of Pescadero Marsh and, therefore, is not subject to the public access and public recreation policies of Chapter 3 of the Coastal Act of 1976 (commencing with Section 30200 of the Public Resources Code).
5. As described in the staff report and, in these findings, the project conforms to specific findings required by policies of the San Mateo County Local Coastal Program.
6. That the project does not include residential use and is, therefore, not subject to the limit on the number of building permits for construction of single-family residences as set by Policies 1.22 and 1.23 as stated in Section 6328.19.

Regarding the Resource Management District Permit, Find:

7. This project has been reviewed under and found to be in compliance with the Development Review Criteria as stipulated in Chapter 36A.2 of the County Zoning Regulations. Staff have determined that the proposed project is consistent with relevant design criteria pertaining to conservation of energy resources, control of air pollution, and replacement of removed vegetation during construction.

Regarding the Grading Permit, Find:

8. This project will not have a significant adverse effect on the environment. The project has been reviewed by both the Department of Public Works and the County Geotechnical Engineer. The project can be completed without significant harm to the environment. That the project conforms to the criteria of Chapter 8, Division VII, San Mateo County Ordinance Code, including the standards referenced in Section 8605. The project, as conditioned, conforms to the criteria for review contained in the Grading Ordinance, including an erosion and sediment control plan, dust control measures, and revegetation mitigations. This project is consistent with the General Plan.

RECOMMENDED CONDITIONS OF APPROVAL

Current Planning Section

1. This approval applies only to the proposal, documents, and plans as described in this report and approved by the Zoning Hearing Officer on November 6, 2025. Minor modifications to the project may be approved by the Director of Planning and Building if they are consistent with the intent of, and in substantial conformance with, this approval.
2. A chain link fence around the LFGTE facility and substation shall be maintained with redwood slats for screening. In addition, all disturbed soil shall be hydroseeded.

3. This Use Permit Amendment, Coastal Development Permit, and Resource Management Permit for the LFGTE facility shall be valid for a period of ten years. The applicant shall apply for renewal of the LFGTE facility Use Permit Amendment, Coastal Development Permit, and Resource Management Permit and pay applicable renewal fees six months prior to expiration. Any modifications to the LFGTE facility will require permit amendments, payment of applicable fees, and consideration at a public hearing.
4. The Grading Permit allows for approximately 418 cubic yards of excavation and 38 yards of fill. The cut material shall be used by BFI for use with their landfill operations. No off haul is allowed under this permit. No road modifications are included in this permit.
5. Prior to the beginning of all construction, the applicant shall implement the approved erosion and sediment control plan. The goal is to prevent sediment and other pollutants from leaving the project site and to protect all exposed earth surfaces from erosive forces.
6. Said plan shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including:
 - a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 15 and April 15. Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area.
 - b. Storing, handling, and disposing of construction materials and waste properly, so as to prevent their contact with stormwater.
 - c. Controlling and preventing the discharge of all potential pollutants, including pavement cutting waste, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
 - d. Using sediment controls or filtration to remove sediment when dewatering the site and obtaining all necessary permits.
 - e. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where washing water is contained and treated.
 - f. Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses.

- g. Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
 - h. Performing clearing and earth-moving activities only during dry weather.
 - i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
 - j. Limiting construction access routes and stabilizing designated access points.
 - k. Avoiding tracking dirt or other materials off-site.
 - l. The contractor shall train and provide instructions to all employees and subcontractors regarding the construction of the best management practices.
 - m. The approved erosion and sediment control plan shall be implemented prior to the beginning of construction.
7. Prior to final planning approval of the building permit for the project, the applicant shall demonstrate that vegetation removed during construction has been replaced. Vegetation for the stabilization of graded areas or for replacement of existing vegetation shall be selected and located to be compatible with surrounding vegetation, and should recognize climatic, soil, and ecological characteristics of the region.
8. The applicant shall secure a permit for the proposed LFGTE facility expansion from the Bay Area Air Quality Management District (BAAQMD).
9. The development and operation of the proposed project shall not impede and adhere to all ongoing mitigation measures required of the 1991 Environmental Impact Report and the 1998 Negative Declaration related to BFI's current operations of the landfill. These are outlined as conditions of approval for the Use Permit, Coastal Development Permit, Grading Permit for the continued operation of the Corinda Los Trancos Sanitary Landfill at Ox Mountain (USE 81-34, CDP 81-74, and GRD 91-0015, PLN 2000-00849). All current conditions of approval and mitigation measures identified in the letter of decisions for the landfill operations, dated March 25, 1999.

Building Inspection Section

10. The applicant shall obtain building permits for the construction of any project-related structures.

11. Erosion and sediment control during the course of any grading work shall be according to the plans prepared and signed by the engineer of record and approved by the Drainage Section. Revisions to the approved erosion and sediment control plan shall be prepared and signed by the engineer.

Geotechnical Section

12. A geotechnical and/or geological report approved by BFI's geotechnical consultant shall be submitted prior to building permit issuance.
13. The Geotechnical Department finds that the submitted report contains an analysis that addresses the potential geologic hazards and therefore may proceed to the building permit stage. However, the acceptance is granted with the understanding that the following points shall be addressed prior to submitting a building permit, not including one recommendation from the reviewing engineer that is not required to be addressed.
 - a. Foundation of retaining walls: As discussed in the former review, the consultant's foundation recommendations rely upon the performance of what they claim is documented fill. The consultant should either provide accurate strength characteristics for the fill planned to be founded upon for the retaining walls or provide recommendations to remove and replace any engineered fill planned to be used for a retaining wall foundation.
 - b. Drainage on Slopes: The consultant should provide drainage recommendations for the control of surface water flow on adjacent uphill slopes or designing the slope for a saturated slope condition on slopes such as section B-B' with mantled colluvium or fill layers. Furthermore, we recommend adding additional protection, such as increasing the freeboard of the retaining wall or adding a catchment fence, for any potential raveling of the slope in that area.
 - c. Provide Updated Report and Plan Review:
 - i. Geotechnical Engineer provides an update report, if necessary, that includes any updates to the site conditions, foundation recommendations, or grading recommendations to accommodate changed conditions.
 - ii. Geotechnical engineer provides a "plan review" that confirms that the recommendations made in the geotechnical report are carried through in the structural plans, grading plans, calculations, and any other permit documents.

- d. RECOMMENDATION ONLY: Direct Shear Testing for Slope Stability Analysis: The consultant should be aware of the limitations of direct shear testing to derive the soil strength values for the purpose of slope stability. These include an inability to control drainage, a forced horizontal failure plane, and a susceptibility to unconservative shear strength values when granular particles are present.

Environmental Health Division

14. Applicant will work with the landfill operator to increase frequency of monitoring for the landfill's perimeter gas wells during the course of project construction, since there have been fairly recent incidences of methane exceedance at the site boundary.
15. Applicant shall minimize LFGTE facility downtime during project construction. Applicant shall coordinate with the landfill operator to notify the landfill operator of any planned and/or extended downtime for the LFGTE facility. If the Ameresco plant is down, Republic shall use their flares to control the landfill gas collection system.

Coastside Fire Protection District

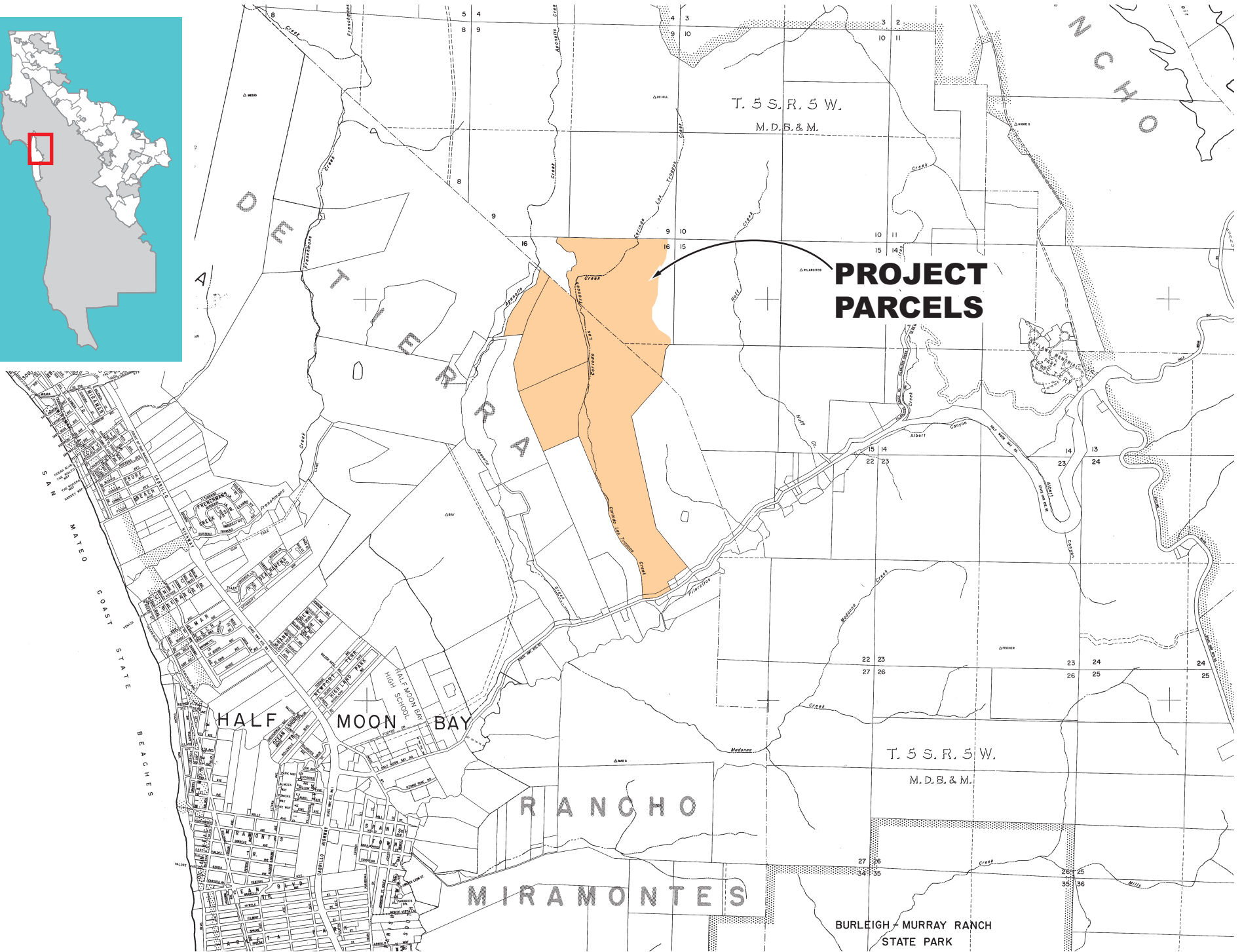
All fire conditions and requirements must be incorporated into your building plans, (see attached conditions) prior to building permit issuance. It is your responsibility to notify your contractor, architect, and engineer of these requirements. Our review is not construed as encompassing the structural integrity of the facility nor abrogating more restrictive requirements by other agencies having responsibility. Final acceptance is subject to field inspection and necessary tests. NOTE: An additional re-inspection fee may be charged for missed appointments, failure to comply, or not being ready. For additional information or to schedule an inspection you may contact the Coastside Fire Protection District Fire Marshal Office at CFPDfiremarshal@fire.ca.gov.

16. Fire hydrants shall be located at the north end of the project site.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT B





COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT C

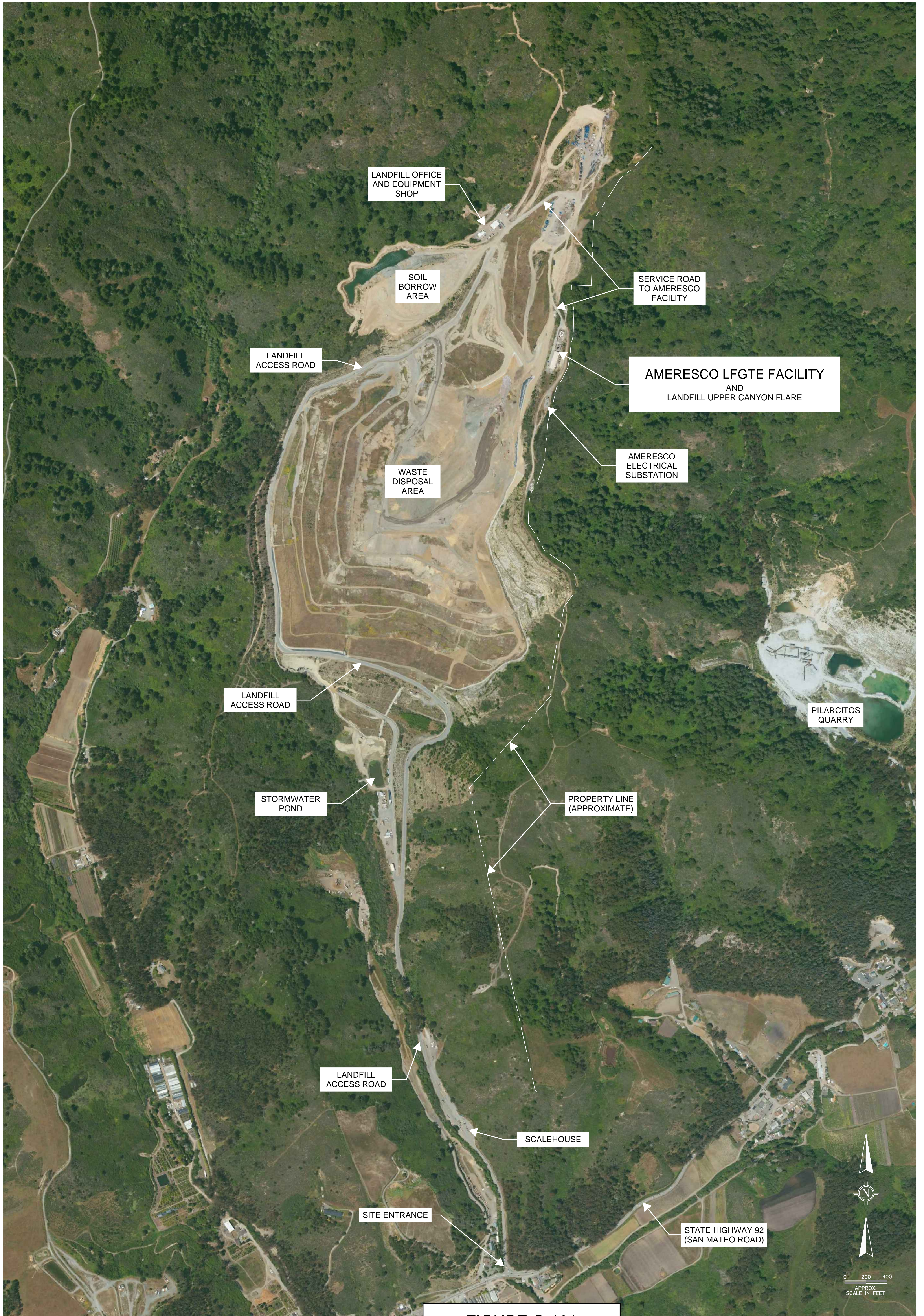




FIGURE C-101

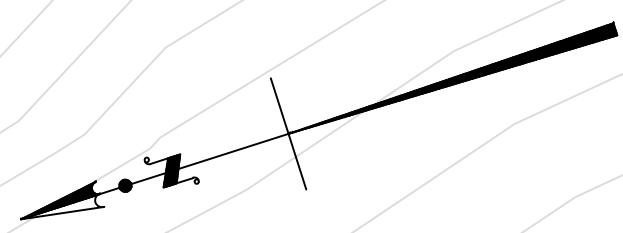
AERIAL PHOTO FROM TERRAIN NAVIGATOR PRO (TRIMBLE, INC.)

PERMIT DRAWING - NOT FOR CONSTRUCTION
LENGTHS, AREAS, PROPERTY LINES ARE APPROXIMATE

 TETRA TECH 21700 Copley Drive, Suite 200 Diamond Bar, CA 91765 909-860-7777	 AMERESCO Green • Clean • Sustainable

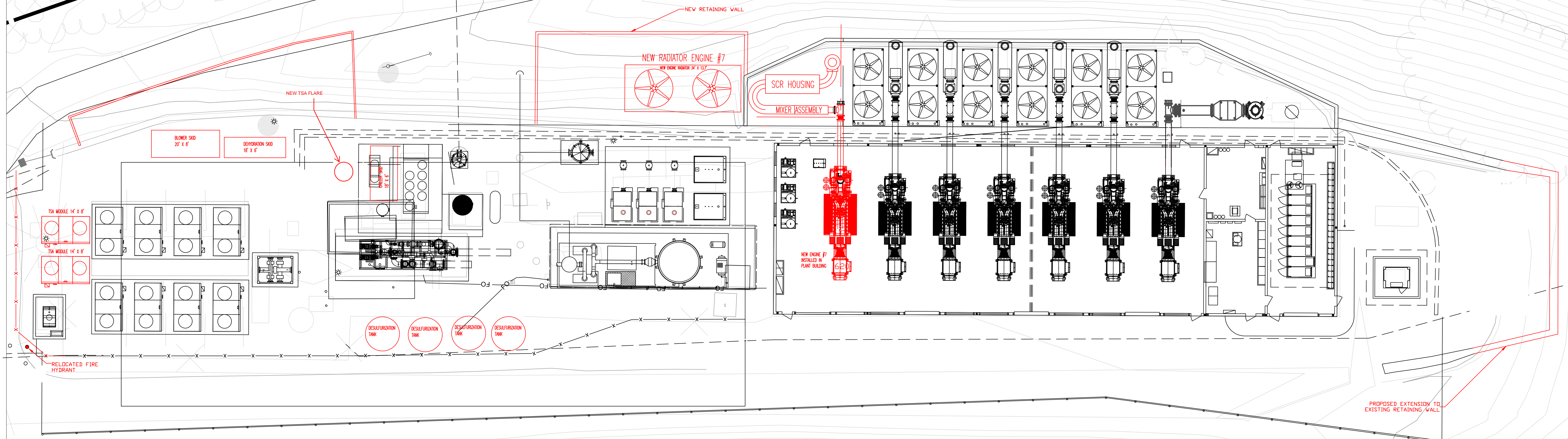
**AMERESCO HALF MOON BAY
OX MOUNTAIN LANDFILL SITE PLAN**

DATE:	16 APRIL 2024
DRAWN BY:	EBT
REVIEW BY:	AS
REV:	2024-1



DENSE TREES

EXISTING HAUL ROAD



PERMIT DRAWING - NOT FOR CONSTRUCTION
LENGTHS, AREAS, PROPERTY LINES ARE APPROXIMATE

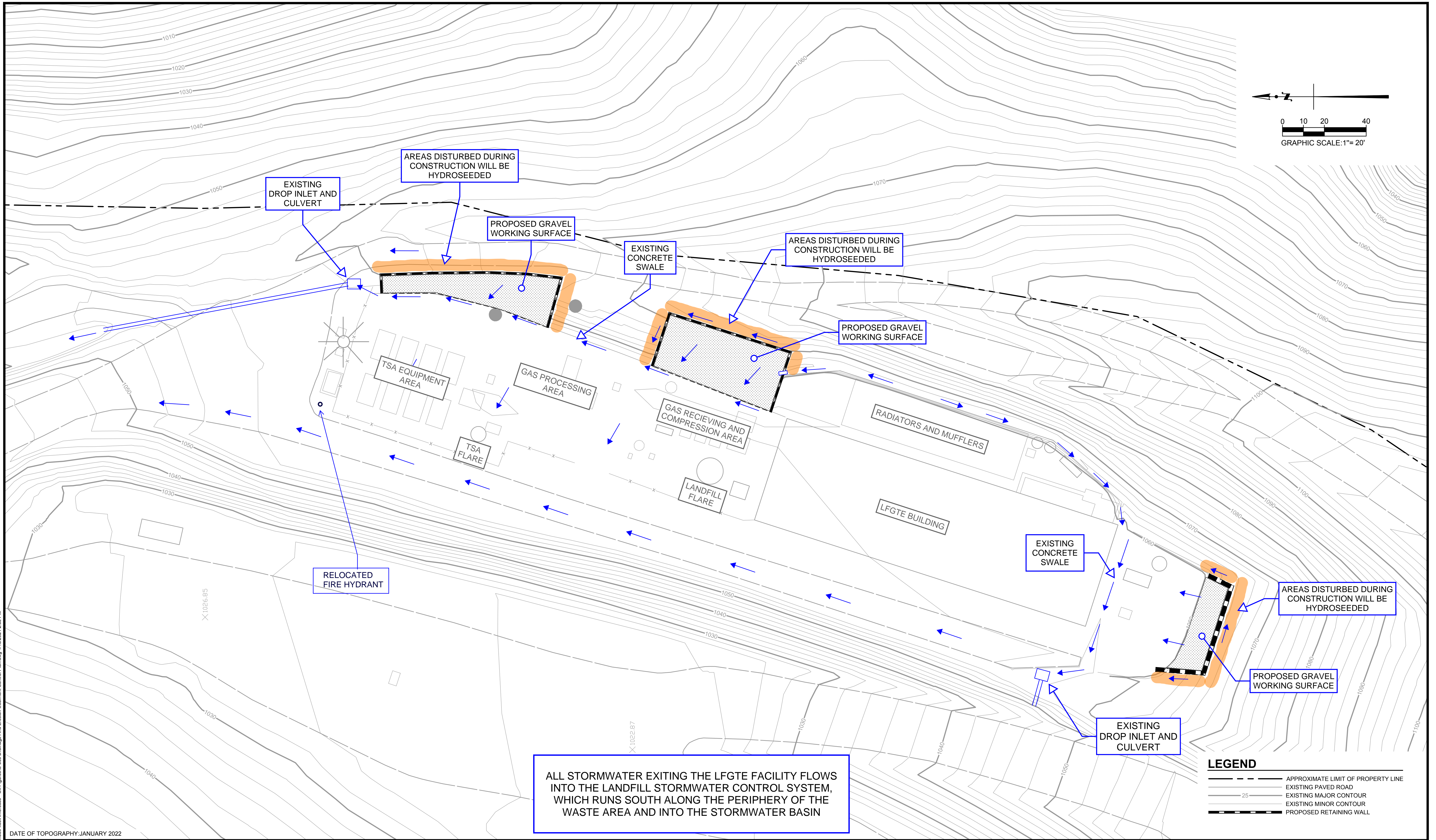
DATE:	9/02/25
DRAWN BY:	ADS
REVIEW BY:	
REV:	2025-1

AMERESCO HALF MOON BAY
OX MOUNTAIN LANDFILL PROJECT SITE PLAN



TETRA TECH
21700 Copley Drive, Suite 200
Fremont, CA 91785
909-866-7777





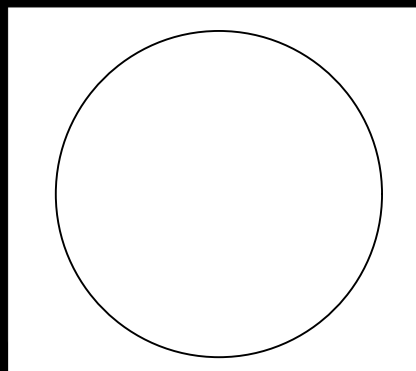
P:\Ameresco\Keller Canyon\IR\CAD\Sheet\Files\Ameresco - Ox Figures\C-805 Drainage And Erosion Sediment Control Plan.dwg 4/18/2024 2:33 PM

DATE OF TOPOGRAPHY: JANUARY 2022

NO.	REVISION DESCRIPTION	DATE
1	Added Fire Hydrant	5/21/25

AMERESCO 
 Half Moon Bay
 111 Speen Street, Suite 410, Framingham, MA 01701 866.263.7372

Tt TETRA TECH
 21700 Copley Drive, Suite 200
 Diamond Bar, CA 91765
 TEL 909.860.7777 FAX 909.860.8017



AMERESCO HALF MOON BAY			
LFGTE FACILITY UPGRADE			
DRAINAGE AND EROSION / SEDIMENT CONTROL PLAN			
DESIGNED BY :	E.B.T.	FILE :	C-805 Drainage And Erosion Sediment Control Plan.dwg
DRAWN BY :	A.N.P.	DATE :	04-2024
CHECKED BY :	E.B.T.	SCALE :	AS SHOWN
APPROVED BY :	E.B.T.	DATE :	04-2024
			Figure 4



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT D

ATTACHMENT E – Site Photos, March 2024



Figure 1 - View of Landfill operation at Ox Mountain



Figure 2 - View of Landfill operation at Ox Mountain



Figure 3 - Ameresco Co-generation Facility at Ox Mountain



Figure 4 - View of Jenbacher Landfill Gas Engine Generators inside the Ameresco plant building



Figure 5 - Proposed Southern Expansion area for engine radiator and other equipment.



Figure 6 – Exhaust and radiator area behind the Ameresco Plant Building



Figure 7 – Republic Landfill Gas Flare which is used when the Ameresco Plant is not operating to combust the landfill gas from the landfill wellfield.



Figure 8 - Ameresco Gas Cooling Skid



Figure 9 - Proposed Northern expansion area. Ameresco plans to cut into the slope and install a retaining wall for area to install additional equipment.



Figure 10 - Northern Area of the facility. Equipment will be installed in the area where the pallets are stored. The area covered in gravel is the Fire Truck turn around area.



Figure 11 – Landfill Perimeter Road on the southern side of the facility.



COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT E

County of San Mateo
Environmental Services Agency
Planning and Building Division

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2005-00469

Hearing Date: September 7, 2006

Prepared By: James A. Castañeda

For Adoption By: Zoning Hearing Officer

RECOMMENDED FINDINGS

Regarding the Environmental Review, Find:

1. This project is categorically exempt pursuant to the California Environmental Quality Act, Section 15329, Class 29, Installation of co-generation equipment with a capacity of 50 megawatts or less at existing industrial facilities. This facility will produce 12 megawatts.

Regarding the Use Permit Amendment, Find:

2. The proposed installation of the Landfill Gas-to-Energy facility will not, under the circumstances of this particular case, be detrimental to the public welfare of injurious to property or improvements in the vicinity. Staff has determined that noise, traffic, public health and safety, and aesthetic impacts are all insignificant and/or mitigated.

Regarding the Coastal Development Permit, Find:

3. That the project, as described in the application and accompanying materials required by Section 6328.7 and as conditioned in accordance with Section 6328.14, conforms to the plans, policies, requirements and standards of San Mateo County Local Coastal Program, as discussed on page 4 of the staff report.
4. The project conforms to specific findings required by policies of the San Mateo County Local Coastal Program (LCP). Staff finds that the proposed project will present a negligible impact to truck traffic at Ox Mountain Landfill and visual resources. The project would be consistent with policies pertaining to vegetation and landscaping, alterations of landforms and scenic corridors presenting little to no impact. The LCP also encourages the development of alternative energy resources. The project will not increase the effects from the ongoing landfill operation creates, and as such will not compromise any continuing mitigation measures in place.

Regarding the Resource Management District Permit, Find:

5. This project has been reviewed under and found to be in compliance with the Development Review Criteria as stipulated in Chapter 36A.2 of the County Zoning Regulations. Staff has determined that the proposed project is consistent with the general site design requirements, and will not further any existing impacts from the current landfill operations performed at the site, because it will not generate additional traffic or be visible from Highway 92, a County Scenic Corridor.

Regarding the Grading Permit, Find:

6. This project will not have a significant adverse effect on the environment. The project has been reviewed by both the Department of Public Works and the County Geotechnical Engineer. The project can be completed without significant harm to the environment. That the project conforms to the criteria of Chapter 8, Division VII, San Mateo County Ordinance Code, including the standards referenced in Section 8605. The project, as conditioned, conforms to the criteria for review contained in the Grading Ordinance, including an erosion and sediment control plan, duct control measures, and revegetation mitigations. This project is consistent with the General Plan.

RECOMMENDED CONDITIONS OF APPROVAL

Planning Division

1. The Landfill Gas-to-Energy facility, related substation, and associated transmission lines shall be limited to the improvement areas indicated on the site plan dated received July 19, 2006.
2. The applicant shall submit color samples for all equipment associated with this project. Structures and equipment shall be of deep earth hues such as dark browns, greens and rusts. A chain link fence around the LFGTE facility and substation shall be placed with redwood slats for screening. In addition, all disturbed soil shall be hydro-seeded. Prior to a final approval by Planning for the building permit, the applicant shall contact the Planning Division to arrange for a site inspection to verify color conformance.
3. This Use Permit Amendment, Coastal Development Permit and Resource Management Permit for the LFGTE facility shall be valid for a period of five years. The applicant shall apply for renewal of the LFGTE facility Use Permit Amendment, Coastal Development Permit, and Resource Management Permit and pay applicable renewal fees six months prior to expiration. Any modifications to the LFGTE facility will require permit amendments, payment of applicable fees, and consideration at a public hearing.
4. This Use Permit Amendment, Coastal Development Permit, and Resource Management Permit shall be reviewed annually for compliance with the operating conditions set forth herein and to consider revision of the conditions so as to assure that the Landfill Gas-to-Energy site is operated in a manner not contrary to the public health, welfare or con-

venience. If no revision to the operating conditions are proposed and no public complaints have been received, the Community Development Director shall perform the annual review.

5. Prior to the beginning of all construction, the applicant shall implement the approved erosion and sediment control plan compatible with current ongoing mitigation measures related to the operation of the landfill. The goal is to prevent sediment and other pollutants from leaving the project site and to protect all exposed earth surfaces from erosive forces. Said plan shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program “General Construction and Site Supervision Guidelines,” including:
 - a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 15 and April 15. Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area.
 - b. Storing, handling, and disposing of construction materials and wastes properly, so as to prevent their contact with stormwater.
 - c. Controlling and preventing the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
 - d. Using sediment controls or filtration to remove sediment when dewatering site and obtain all necessary permits.
 - e. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
 - f. Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses.
 - g. Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
 - h. Performing clearing and earth-moving activities only during dry weather.
 - i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
 - j. Limiting construction access routes and stabilizing designated access points.
 - k. Avoiding tracking dirt or other materials off-site.

- l. The contractor shall train and provide instructions to all employees and subcontractors regarding the construction of best management practices.
 - m. The approved erosion and sediment control plan shall be implemented prior to the beginning of construction.
6. A geotechnical and/or geological report approved by BFI's geotechnical consultant shall be submitted prior to building permit issuance.
 7. All aspects of the proposed grading shall comply with the performance standards, as detailed in the Grading Permit Performance Standards Handbook, during all stages of development.
 8. The development and operation of the proposed project shall not impede and adhere to all ongoing mitigation measures required of the 1991 Environmental Impact Report and the 1998 Negative Declaration related to BFI's current operations of the landfill. These are outline as conditions of approval for the Use Permit, Coastal Development Permit, Grading Permit for the continued operation of the Corinda Los Trancos Sanitary Landfill at Ox Mountain (USE 81-34, CDP 81-74, and GRD 91-0015, PLN 2000-00849). All current conditions of approval and mitigation measures identified in the letter of decisions for the landfill operations, dated March 25, 1999

Building Inspection Section

9. The applicant shall obtain building permits for the construction of any project-related structures.

Department of Public Works

10. Erosion and sediment control during the course of any grading work shall be according to the plans prepared and signed by the engineer of record, and approved by the Department of Public Works and the Planning Division. Revisions to the approved erosion and sediment control plan shall be prepared and signed by the engineer.

Half Moon Bay Fire Protection District

11. The applicant shall comply with Public Resources Code 4291, California Fire Code and Local Ordinance 2002-01.

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COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT

ATTACHMENT F

June 3, 2025
 File No. 01203117.02

MEMORANDUM

TO: Stevia Smith - Ameresco
 FROM: Jeff Leadford, P.E. - SCS Engineers
 SUBJECT: Half Moon Bay Expansion Permitting Modeling Scale Up

Ameresco Half Moon Bay, LLC (Ameresco) requested SCS Engineers (SCS) to perform a simple scale-up on previous Carbon Monoxide (CO) modeling to determine the emissions associated with the proposed expansion at the Half Moon Bay Landfill Gas to Energy (LFGTE) plant. Previous modeling emissions and results will be taken from the PSD Air Quality Modeling Report (Modeling Report) submitted to the Bay Area Air District (BAAD) on January 31, 2006. CO emissions associated with the proposed expansion were provided by Ameresco in a May 22, 2025 email to SCS.

CO emissions modeled in the Modeling Report were 12.39 pounds per hour (lb/hr) for each engine (six in total) and 2.40 lb/hr for the flare. Results of the modeling showed peak modeling concentrations, in micrograms per meter cubed (ug/m3), with background CO concentrations as shown below in Table 1. These were then compared to both state and national ambient air quality standards.

Table 1: Modeling Report Results

Pollutant and Period	Modeled Concentration (ug/m3)	Previous Background Concentration (ug/m3)	Total Concentration (ug/m3)	Ambient Standard (State/National)
CO 1-hour	1,323	2,412	3,735	23,000/40,000
CO 8-hour	580	1,183	1,763	10,000/10,000

From the May 22, 2025 email, CO emissions for the six existing engines are not changing. The proposed expansion would include an additional engine emitting 11.07 lb/hr of CO, and a second flare emitting 1.51 lb/hr. for a simple scaling technique, modeled concentrations will be scaled up based on a total increase in CO. Total initial CO emissions were 12.39 lb/hr *6 (six engines) + 2.40 lb/hr, or 76.74 lb/hr. The expansion emissions would then be 76.74 lb/hr + 11.07 (seventh engine) + 1.51 lb/hr (second flare), or 89.32 lb/hr. This constitutes a 16.4% Increase in CO emissions, which are applied to the previously modeled concentrations above and compared to the ambient standards in Table 2 below. Background concentrations were updated to a nearby monitoring station at 158b Jackson Street in San Jose, California for 2024.



MEMORANDUM

June 3, 2025

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Table 2: Scaled Modeling Results for Expansion

Pollutant and Period	Previous Modeled Concentration (ug/m3)	Scaled Model Concentration (ug/m3)	2024 Background Concentration (ug/m3)	Total Concentration (ug/m3)	Ambient Standard (State/National)
CO 1-hour	1,323	1,540	1,604	3,144	23,000/40,000
CO 8-hour	580	675	1,260	1,935	10,000/10,000

Results clearly indicate that a 16.4% increase in CO emissions will not come close to tripping the ambient air quality standards for California or Nationally. Total concentrations significantly below the ambient standards indicate that the expansion will not inversely affect the environment and thus the project will be in compliance with all applicable standards.

If you have any questions, please contact Jeff Leadford at leadford@scsengineers.com or 720-272-0172.

Sincerely,



Jeff Leadford, PE
Senior Project Professional
SCS ENGINEERS



Pat Sullivan, REPA, CPP, BCES
Senior Vice President
SCS ENGINEERS