



United States Department of the Interior



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In Reply Refer to:
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June 10, 2025
Sent Electronically

Thomas B. Silko
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Subject: Informal Consultation on the Demolition, Decontamination, and Decommissioning of Vallecitos Boiling Water Reactor and General Electric Test Reactor in Sunol, California.

This letter is in response to the NorthStar Vallecitos, LLC's April 12, 2025, request for informal consultation with the U.S. Fish and Wildlife Service (Service) on the proposed Demolition, Decontamination, and Decommissioning of the Vallecitos Boiling Water Reactor (VBWR) and General Electric Test Reactor (GETR) (proposed project) at the Vallecitos Nuclear Center in Sunol, Alameda County, California. NorthStar Vallecitos, LLC is the designated non-Federal representative of the Nuclear Regulatory Commission (NRC) for the VBWR and GETR. This request was received electronically by the Service on April 12, 2025. At issue are the proposed project's effects on the federally listed as threatened Alameda whipsnake (*Masticophis lateralis euryxanthus*), the federally listed as threatened California red-legged frog (*Rana draytonii*), the federally listed as threatened Central California Distinct Population Segment California tiger salamander (*Ambystoma californiense*, California tiger salamander), and the federally listed as endangered San Joaquin kit fox (*Vulpes macrotis mutica*). This response is provided under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (Act), and in accordance with the implementing regulations pertaining to interagency cooperation (50 CFR 402).

Pursuant to 50 CFR 402.12(j), you submitted a biological assessment for our review and requested concurrence with the findings presented therein. These findings conclude that the proposed project may affect but is not likely to adversely affect the Alameda whipsnake, the California red-legged frog, the California tiger salamander, and the San Joaquin kit fox.

Project Description

NorthStar Vallecitos has submitted to the NRC, via Letter No. NSV 24-003 dated September 26, 2024, a License Amendment Request (LAR) to request NRC review of major decommissioning

activities, as defined in 10 CFR 50.2, that could diminish the historic integrity (e.g., physical demolition) of Vallecitos Nuclear Center structures deemed potentially eligible for placement on the National Register of Historic Places. This LAR initiated a federal action which required a determination under the Act. The federal action involves the decontamination and demolition of all structures and facilities onsite to restore the Site Developed Area back to its original, pre-industrial condition. Demolition of all structures is a necessary consequence of the decommissioning process, for the termination of the licenses, and for the eventual reuse of the property for industrial use. The proposed action is to restore the Vallecitos Nuclear Center (the site) back to its original pre-industrial condition by performing demolition, decontamination and restoration (D&D) of the site's developed area. The proposed action includes the demolition of two potentially historically significant structures, including the GETR and the VBWR (Figure 1). The site is a 1,600-acre property currently owned by General Electric Hitachi, located at 6705 Vallecitos Road in the unincorporated area of Sunol, California. NorthStar Vallecitos, LLC, has acquired the site and is progressing with its decommissioning, which will involve demolishing the various buildings and associated facilities. The decommissioning of the Site will be properly permitted with the appropriate county, state, and federal agencies. Once a final layer of topsoil has been spread, hydroseeding (or similar) will take place with grass appropriate for the region. The only anticipated impacts are to the facility buildings, roads, and previously disturbed grounds. No impacts are planned to occur in areas of shrub-scrub, forest, grasslands, wetlands, or any other naturalized habitat where a viable wildlife population could occur. No trees within these native or naturalized areas plan to be cut.



Conservation Measures

- A qualified wildlife inspection individual, as trained and approved by a Qualified Biologist, shall conduct a preconstruction survey for suitable habitats that might be used by special-status species within 14 days of starting decommissioning or demolition activities. Habitats, such as small mammal burrows utilized by California-red legged frogs or suitable kit fox dens shall be identified and flagged. If any such habitat is identified, a biological monitor shall be on site for those locations during the activities.
- To avoid and minimize impacts to special status species, all personnel working in the project area will receive environmental sensitivity training prior to initiating project activities. Training will include a review of environmental laws and conservation measures that must be followed by all personnel to reduce or avoid effects on covered species during project activities.
- To prevent inadvertent entrapment of amphibian and reptile species, all excavations or trenches shall be covered or provided with a wildlife escape ramp at the end of each working day. All pipes shall be capped. Before the holes or trenches are filled, they will be thoroughly inspected for entrapped wildlife by a qualified wildlife inspection individual as trained and approved by a Qualified Biologist.
- No fueling or servicing of equipment shall be performed in or near a water source. For stationary equipment that must be fueled or serviced on-site, containment shall be provided in such a manner that any accidental spill will not come in direct contact with soil, or surface water.
- Vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas to the extent possible.
- If a special-status species is detected within the project footprint, work shall stop, and NorthStar shall notify the Service. The special-status species will be permitted to leave on their own accord without interference.
- To deter species from entering the project area, silt fencing will be placed along the section of road nearest the pond on the facility (figure 2). This fencing will be monitored regularly to ensure no species is trapped in or around the fencing.
- Following rain events, speed limits in the vicinity of the pond and vegetated ditch areas will be lowered from 20 miles per hour (mph) to 5 mph to further prevent collisions with wildlife.



Habitats and Occurrences in the Action Area

The action area for the proposed project is located in Alameda County, California approximately 2 miles east-northeast of the center of the Town of Sunol and north of State Route 84. The action area is in the San Francisco Bay Area subregion of the Central Western California region typified as a diversity of vegetation types from the very wet redwood forests to dry oak/pine woodland and chaparral. A site visit conducted on November 14, 2024, determined that the more natural parts of the action area are primarily dry oak/pine shrub/scrub and shrubby forest surrounded by farmed grassland. One small pond was observed in the northeastern portion of the action area. This pond has been noted to have occasionally gone dry. The last time this was noted was 2015, making the likelihood of predatory fish very low. Also noted were ephemeral drainages that lead from north to south through the action area and eventually leave the action area through a culvert under State Route 84. The majority of the action area comprises buildings, driveways, and disturbed, sparsely vegetated ground. All of the planned activity will be taking place within this community. If present in the action area, special status species could be impacted by noise, behavioral changes due to avoidance of vehicles, machinery and general activity, and collisions/crushing from vehicles and/or machinery.

Alameda whipsnake

There are 2 recorded occurrences of Alameda whipsnake within 5 miles of the facility, the nearest of which was identified in 1974 (CNDDDB). The action area does not contain high-quality habitat for the Alameda whipsnake. The surrounding area, as well as the edges of the action area, consists of shrubs, grasslands, and vegetative debris piles, which could provide potential habitat for the Alameda whipsnake. However, it is unlikely the Alameda whipsnake will occur in active areas due to the lack of suitable habitat. Alameda whipsnake or suitable habitat for the species was not observed during the November 2024 site survey.

California red-legged frog

There are 25 recorded occurrences of California red-legged frog within 5 miles of the facility, with the closest occurrence 0.40 mile to the west (CNDDDB). The action area contains potential habitat for the California red-legged frog. Unidentified frogs have been seen around a cattail dominated ephemeral drainage near the pond. The pond could serve as potential habitat for the species. However, mature bullfrogs, a known predator, are observed in the pond and could diminish the presence of the species. No California red-legged frogs were observed during the November 2024 site survey.

California tiger salamander

There are several occurrences of California tiger salamander within 5 miles of the facility, including an occurrence identified in 1991 that currently encompasses the project area (CNDDDB). Lee Lake could provide habitat for the California tiger salamander. Uplands, grasslands, and shrubby areas are frequent in areas surrounding the facility. No ground squirrels or pocket gophers were seen during the November 2024 site visit, although small holes do exist in some of the upland areas, especially around a temporary drainage north of the pond. Both

upland and wetland habitats are present for the salamander. No California tiger salamanders were observed during the November 2024 site survey.

San Joaquin kit fox

There are no recorded occurrences of San Joaquin kit fox within 5 miles of the project area (CNDDDB). However, the action area is surrounded by agricultural grassland, and several shrubby areas exist around the pond and facility boundaries. Vegetation debris piles along with dry channels create at least marginal denning and hunting habitat. The best habitat for San Joaquin kit fox activity is outside of the project's focus. If the fox is present around the perimeter of the project, due to the lack of habitat around the demolition/restoration activities, there would be little chance of interaction. No San Joaquin kit foxes were observed during the November 2024 site survey.

Conclusion

The Service concurs that the proposed project, including all conservation measures listed here, may affect, but is not likely to adversely affect the Alameda whipsnake, California red-legged frog, California tiger salamander, or San Joaquin kit fox. The effects of the proposed project are discountable based on the following: (1) the only anticipated impacts are to the facility buildings, roads, and disturbed grounds; (2) the likelihood that the species will be encountered in the active project area is low; and (3) the implementation of the proposed conservation measures will help avoid adverse effects to the species. The Service believes that any potential impacts to the Alameda whipsnake, California red-legged frog, California tiger salamander, and San Joaquin kit fox from the proposed project are unlikely to occur and thus, are discountable for purposes of consultation.

This concludes the Service's review of the proposed project. No further coordination with the Service under the Act is necessary at this time. This letter does not authorize take of listed species. Unless new information reveals effects of the project that may adversely affect federally listed species or critical habitat in a manner not identified to date, or if a new species is listed or critical habitat is designated that may be affected by the proposed action, no further action pursuant to the Act is necessary for the proposed project.

If you have any questions regarding the proposed Demolition, Decontamination, and Decommissioning of the Vallecitos Boiling Water Reactor and General Electric Test Reactor in Sunol, Alameda County, California, please contact Rebekah Gordon, Fish and Wildlife Biologist (rebekah_gordon@fws.gov), or me, (ryan_olah@fws.gov) at (916) 414-6623.

Sincerely,

Ryan Olah
Coast Bay Division Supervisor

cc:

Mitchell Dehmer, Nuclear Regulatory Commission, Rockville, MD