
NSB's land management regulations to oil and gas activities on federal lands is subject to legal constraints and therefore must be evaluated on a case-by-case basis as particular activities are proposed.

ABANDONMENT AND REHABILITATION

Land ownership would not be affected by abandonment and rehabilitation. Upon completion of abandonment and rehabilitation, land uses and management may return to something similar to the current situation. For discussion of subsistence and recreation use after abandonment and rehabilitation, see sections 4A.4.3.1 and 4A.4.7.1, respectively.

4A.4.6.2 Alternative A – Full-Field Development Scenario Impacts on Land Uses and Coastal Management

LAND OWNERSHIP AND USES

Development under Alternative A FFD would result in construction of proposed facilities on lands owned by the federal government, the state, and Kuukpik Corporation. Implementation of CPAI's proposed plan under Alternative A FFD would not change ownership status on lands within the ASDP Area, but would occur under negotiated leases.

Development of the FFD scenario would result in development occurring throughout the ASDP Area, with an additional 22 satellite production pads and associated roads and airstrips totaling an approximate impact area of 1,261 acres and 150 miles of pipelines. The FFD scenario would result in a substantial increase in the area developed and would provide additional access to areas farther west and north of the Plan Area. Access would remain limited to oil industry personnel and local subsistence users. Effects on subsistence resources and recreation for FFD are discussed in Sections 4A.4.3 and 4A.4.7.

In the areas of BLM-designated Special Areas, SMZs, and LUEAs within the National Petroleum Reserve-Alaska, Alternative A FFD would include development of a production pads, roads, and pipelines within LUEA buffer areas, SMZs, and Special Areas. In addition to the exceptions from the BLM stipulations discussed for the CPAI proposal above, the FFD would require an exception for development of a production pad and associated pipeline in the area near the Kogru River designated for no surface activities. Additional development within the Colville River Special Area, the Fish Creek buffer area, Sensitive Consultation areas around Fish Creek and the Colville River, and the special caribou stipulation area would be subject to additional consultation and review to minimize impacts to the greatest extent feasible.

The potential impacts to fish resources and subsistence activities from construction of oil and gas facilities adjacent to Fish Creek and in the other designated areas are discussed in detail in Sections 4A.3.2 and 4A.4.3, respectively.

COASTAL MANAGEMENT

Development proposed under Alternative A FFD includes construction and operation of 22 satellite production pads, two additional processing facilities, as well as roadways, pipelines, and an airstrip. As with Alternative A, most of these facilities are proposed on federal lands within the National Petroleum Reserve-Alaska; however, additional development would also be on state and Kuukpik lands within the coastal zone. Although federal lands are excluded from the coastal zone under the CZMA, development on federal lands is required to comply with state coastal programs to the extent possible; thus, this section evaluates proposed FFD against the state and local district coastal zone standards, regardless of whether or not the development occurs on federal lands. Standards of the ACMP include statewide standards found in regulations (6 AAC 80.040 – 6 AAC 80.150) and the enforceable policies of the affected coastal district, the NSB.

ALASKA COASTAL MANAGEMENT PROGRAM

As previously stated, the ACMP provides standards and guidance for development occurring within the coastal zone to balance development needs and the protection of valuable coastal resources. The state requirements in 6 AAC 80 address, but are not limited to, coastal development, recreation, development of energy facilities, transportation and utility routes, mining and mineral processing, habitats, preservation of historical resources, air and water quality, and solid-waste disposal. Effects of FFD under the listed state requirements are provided in the following section. The standard itself is stated under the effects of proposed Alternative A – CPAI Development Plan.

Coastal Development (6 AAC 80.040)

The FFD scenario proposes construction of additional oil production and transportation facilities throughout the ASDP Area, both within the National Petroleum Reserve-Alaska and outside the National Petroleum Reserve-Alaska in the Colville River Delta. Many of the proposed production sites under the FFD scenario are much closer to the coast, particularly at the northern coast of the Kalikpik-Kogru Rivers Facility Group of National Petroleum Reserve-Alaska and in the Colville River Delta. Development of access roads has been restricted in many of these areas, with airstrips included at the production sites for access. Again, development of potential oil reserves in these areas requires the development of production and transportation facilities near the oil reserves; therefore there are no feasible inland alternatives to the development. Development of the FFD facilities, in compliance with the BLM stipulations (with the exceptions noted) and alternative measures potentially required by the state to minimize potential effects to coastal resources, is expected to result in the compliance of this alternative with the coastal development standard.

Geophysical Hazard Areas (6 AAC 80.050)

Development of facilities under the FFD scenario would be required to meet the same design standards as proposed under the CPAI project to protect permafrost and to reduce the potential for damage to structures or personnel from floods geophysical hazards, and severe weather events. Incorporation of these design standards would be expected to adequately address this geophysical hazard standard.

Recreation (6 AAC 80.060)

The area affected by the FFD scenario has limited recreational use due to its remote location. Development of facilities under the FFD scenario would be required to comply with the same stipulations discussed for the CPAI development regarding continued access for subsistence and traditional land uses within the National Petroleum Reserve-Alaska. Development under Alternative A, given compliance with BLM stipulations addressing subsistence and traditional land uses access, as well as alternative measures potentially required by the state, is expected to comply with the recreation standard.

Energy Facilities (6 AAC 80.070)

Alternative A FFD would consolidate facilities to the extent possible; however, additional processing facilities beyond the existing Alpine Facility would be required. Roadways, pipelines, and other structures would be designed to minimize potential adverse effects on coastal resources to the greatest extent possible. Although more exceptions from existing BLM stipulations on locations of permanent oil and gas facilities would be required, compliance with the majority of the stipulations protecting scenic, recreational, and cultural resources and with alternative measures potentially required by the state, are expected to address the energy facility criteria and result in compliance with this standard.

Transportation and Utilities (6 AAC 80.080)

The FFD scenario calls for additional roads, bridges, and pipelines throughout the ASDP Area. Roads and pipelines serving each production site would be co-located, and regional processing facilities would be constructed in the vicinity of the production pads. The proposed coastal production pad near the Kogru River and the production sites proposed in the lower Colville River Delta would be accessed by air to avoid road construction in the areas closest to the coast. Exceptions to stipulations on construction of permanent facilities within some buffer areas and road access between separate oilfields would be required for this alternative. Based on the lack of alternatives that could avoid these sensitive areas, the BLM stipulations and alternative measures that will potentially be required by the state to reduce the adverse effects of construction of required roads, development under the FFD scenario is expected to conform with this standard.

Mining and Mineral Processing (6 AAC 80.110)

The Alternative A – Full-Field Development Scenario would likely require gravel resources beyond those currently identified. Any new gravel mining operation within the coastal zone would be required to receive a permit, which would maximize conformance with state coastal management standards and protection of coastal resources. In addition, the gravel mining permit process may impose additional mitigation measures. The lack of feasible alternatives, along with compliance with the majority of the BLM stipulations and alternative measures potentially required by the state, are expected to result in conformance with this standard.

Subsistence (6 AAC 80.120)

Development of FFD would result in more widespread development of roads, bridges, and pipelines through the ASDP Area. FFD would result in construction of facilities within the Fish Creek LUEA buffer area, within the buffer area on the upper Colville River, within a high-value caribou area within the Kalikpik-Kogru Rivers Facility Group, within an area restricted to surface development near the Kogru River, and throughout the lower Colville River Delta. Production pads in the lower Colville River Delta and other coastal areas would not be accessible by road and would require airstrips for access. Construction and operation of these facilities would be required to comply with the stipulations outlined in the Northeast National Petroleum Reserve-Alaska ROD (BLM and MMS 1998b) to minimize effects to subsistence to the greatest extent possible. Potential effects on subsistence from development under the FFD scenario are discussed further in Section 4A.4.3. Compliance with existing stipulations (with the exceptions noted) and alternative measures potentially required by the state is expected to result in conformance with the coastal standard for subsistence.

Habitats (6 AAC 80.130)

The Alternative A – Full-Field Development Scenario would result in additional impacts to the habitats identified above. Again, the development would be expected to meet the three-pronged test of serving an important public need, having no feasible inland alternative to development in these habitats, and being designed to maximize conformance to the standards through design and operations measures to minimize potential environmental impacts. As the FFD scenario does not specify exact locations of facilities, it is expected that the exact layout would be adjusted based on field studies and would be designed to maximize conformance with the coastal habitat standard. This alternative would require exceptions from some BLM stipulations regarding permanent oil facilities within resource setback areas and regarding road connections between separate oilfields. Other stipulations in Appendix D, as well as alternative measures potentially required by the state, would be incorporated into the project to reduce adverse effects on natural and cultural resources to the greatest extent feasible. Development of FFD would be expected to comply with the habitat standard through incorporation of the BLM stipulations with the exceptions noted and alternative measures potentially required by the state.

Air, Land, and Water Quality (6 AAC 80.140)

Oil production and transportation facilities proposed under the FFD scenario would likely require new Title V permits to address air emissions from the proposed new production and processing facilities. Stormwater pollution prevention plans and additional NPDES permits might be required to address potential water quality effects from the proposed facilities. Additional ODPCPs would be required to address prevention and spill response for the new facilities. The need for an additional landfill for solid wastes has not been determined at this point; however, any new landfill would be required to meet the ADEC solid waste permitting requirements. Compliance with ADEC and USEPA regulations are an essential requirement of FFD and would result in conformance with this coastal management standard.

Historic, Prehistoric, and Archaeological Resources (6 AAC 80.150)

Under the FFD scenario, development would be spread over a much wider area and would be anticipated to encounter more cultural resources. As discussed above, adverse effects to any cultural resources identified through an inventory would require avoidance through siting refinements or mitigation through data recovery or other means. Potential effects on cultural resources from FFD are addressed further in Section 4A.4.5. Section 106 regulations, BLM stipulations (with the exceptions noted), and alternative measures potentially required by the state, are expected to protect cultural resources in accordance with the coastal management standard.

NORTH SLOPE BOROUGH COASTAL MANAGEMENT PROGRAM

As previously stated, for the NSB, the primary goal of the district's CMP Enforceable Policies is to ensure that development activities do not substantially interfere with subsistence activities or jeopardize the continued availability of subsistence resources, but are balanced with protection of the Inupiat culture and lifestyle (NSB 1998).

For the Alternative A – Full-Field Development Scenario, the current *NSB Standards for Development* (NSB CMP 2.4.3) requires that development maintain subsistence resources at a level to meet local needs, protect cultural resources, and comply with federal regulations on land, air, and water quality. Consultation would be conducted as required to address potential cultural resource effects. Development would require appropriate state and federal permits ensuring compliance with federal regulations. Compliance with project specific procedures in Section 2, the BLM stipulations (with the exceptions noted above), and alternative measures potentially required by the state, is expected to reduce impacts on fish and wildlife so that adverse effects to subsistence do not reduce subsistence resources below the level required for local needs.

Development under the Alternative A FFD scenario would incorporate construction and design measures that are intended to reduce impacts on fish and wildlife migration. Access to subsistence resources and to traditional land uses areas would be protected under the BLM stipulations and alternative measures potentially required by the state. The development would acquire all required USEPA and ADEC reviews and permits on air, water, and waste discharges as required under the *CMP Required Features for Applicable Development* (NSB CMP 2.4.4).

As addressed previously in the evaluation of Alternative A, the current NSB *Best Effort Policies* (NSB CMP 2.4.5) reflect criteria similar to the three-pronged test under the ACMP. As compared to the CPAI development proposal, the FFD scenario increases the extent of development throughout the ASDP Area. Major facilities, such as processing facilities, would be shared by multiple production sites to the extent feasible. Additional roadways and pipelines would be constructed and would require design measures to reduce potential effects on fish and wildlife habitat and movements. Many of the proposed sites, particularly in the Colville River Delta, would be limited to access by air. FFD would be expected to meet the current CMP best effort standards for public need, lack of alternatives, and minimization of adverse effects.

The NSB CMP also contains standards for *Minimization of Negative Impacts* (NSB CMP 2.4.6). The proposed development under FFD for Alternative A includes design measures to protect permafrost and to address geophysical hazards as discussed previously under the ACMP. Transportation facilities have been sited and

designed to preserve existing drainage patterns and to minimize effects on fish and wildlife migration. Although this alternative would require exceptions from some BLM stipulations as described above, compliance with the project specific procedures in Section 2, the other BLM stipulations in Appendix D, and alternative measures potentially required by the state, is expected to further reduce the development's impact on coastal resources. Thus, the proposed development is expected to be consistent with these CMP standards.

NORTH SLOPE BOROUGH LAND MANAGEMENT REGULATIONS

Most of the land within the NSB is zoned as Conservation, with the exception of some village sites and the existing oilfields at Prudhoe Bay and Alpine Field. The NSB's Resource Development zoning classification covers areas designated for oil development activities. Development to the east of National Petroleum Reserve-Alaska in the Colville River Delta under FFD would require a re-zoning of the development areas to the Resource Development classification and permitting of activities through the approval of a master plan. Application of the NSB's land management regulations to oil and gas activities on federal lands is subject to legal constraints and therefore must be evaluated on a case-by-case basis as particular activities are proposed.

4A.4.6.3 Alternative A – Summary of Impacts (CPAI and FFD) on Land Uses and Coastal Management

Construction and operation of the Alternative A – CPAI Development Plan is not anticipated to result in adverse effects to existing land uses and ownership. A direct impact, however, would be the increase in the acres of developed land within the Plan Area. Implementation of the CPAI proposal under Alternative A would result in an increase of 2.4 times the total number of acres currently developed for oil production within the Plan Area. The Alternative A – CPAI Development Plan would require a BLM exception for construction and operation of permanent facilities within the designated Fish Creek setback area. CPAI would also have to obtain exceptions from BLM for development of some facilities within the 500 foot setback from other water bodies, and for the road connection between separate oilfields within the National Petroleum Reserve-Alaska. Development of facilities within the Colville River Special Area requires maximum protection of the area's surface resources, while allowing for development of the area's oil reserves. Incorporation of the BLM stipulations in Appendix D (with the exceptions noted), design and construction measures identified in Section 2, and alternative measures potentially required by the state, are expected to achieve maximum protection of the Colville River area's resources while allowing for oil facility development.

The proposed FFD of a production pad and associated pipeline in the area near the Kogru River, designated for no surface activities, would require another exception from BLM from the surface use restrictions for this area. Adoption of other elements of FFD also would require approval for additional development within the CRSA, the Fish Creek buffer area, Sensitive Consultation areas, and the special caribou stipulation area.

The proposed development, constructed and operated in compliance with the project specific procedures in Section 2, the BLM stipulations for the area (with the exceptions noted), and alternative measures potentially required by the state, is expected to be consistent with state and NSB coastal management policies. Implementation of Alternative A (CPAI and FFD) for areas east of the National Petroleum Reserve-Alaska would require NSB re-zoning from "Conservation" to "Resource Development" and permitting of activities through the approval of a master plan. Application of the NSB's land management regulations to oil and gas activities on federal lands is subject to legal constraints and therefore must be evaluated on a case-by-case basis as particular activities are proposed.

4A.4.6.4 Alternative A – Potential Mitigation Measures (CPAI and FFD) for Land Uses and Coastal Management

No mitigation measures have been identified for Alternative A CPAI or FFD for land uses and coastal management.

4A.4.6.5 Alternative A – Effectiveness of Protective Measures for Land Uses and Coastal Management

There are no Northeast National Petroleum Reserve-Alaska IAP/EIS stipulations that apply to coastal zone management, and since impacts are not expected from the CPAI proposal this EIS has not identified potential mitigation relative to coastal zone management.

4A.4.7 Recreation Resources

Potential effects on recreation from the applicant's proposed action were assessed by determining the various types of recreational uses occurring in the Plan Area. These uses were then evaluated to determine their sensitivity to the short-term and long-term effects of the projects. This assessment used both the results of discussions with outfitter guides operating in the Plan Area and previous knowledge of the Plan Area's natural resources.

4A.4.7.1 Alternative A – CPAI Development Plan Impacts on Recreation Resources

As noted in Section 3.4.7 the Plan Area is characterized by vast stretches of low wetland tundra with abundant wildlife resources and very low evidence human activity. Much of the recreational activity in the Plan Area is along the Colville River, with most organized recreation occurring or originating in the vicinity of Umiat to the south and Nuiqsut to the north. Most of the recreation in the project area occurs from May through September.

Most construction features associated with the proposed alternatives such as roads, pipeline construction, and gravel pad construction would occur during the winter months to minimize effects to the tundra environment. Very little organized recreation occurs during these harsh winter months, and only limited recreation occurs in the area during the summer months, as described in Section 3.4.7.

Potential effects on recreation from the Alternative A – CPAI Development Plan will likely include a loss of opportunities to experience wilderness-type values, such as naturalness and solitude, as well as a loss of area available for recreation because of development related activities (construction and operations). As explained in Section 3.4.7, the Plan Area provides opportunities for recreational visitors to experience naturalness and solitude associated with the SPM ROS class. Those engaging in non-subsistence hunting, hiking, and photography independent of outfitter guides would likely be subject to similar recreation-related impacts as outfitter guides, whose clients account for the majority of recreation users. The area also provides areas for wildlife viewing and limited fishing and hunting opportunities. Some opportunities for recreation would likely be reduced and some recreationists would be displaced (through loss of acreage available for recreational use) if the additional five satellites are developed. Under FFD, the effects are expected to be similar, but larger in scope.

Although the quality of the recreational experience in the Plan Area could also be indirectly affected through short- or long-term changes in ambient conditions, such as noise, interruption of views, or dust and odor, these issues are evaluated in detail in other sections of this document.

During construction, the estimated 100 to 150 summer recreation users, as well as the few winter recreation users (no specific numbers on winter recreationists are available) of the ASDP Area could be affected by noise, marred views, and disturbance to birds (affecting birdwatchers) and game and fish (affecting hunters and anglers). During the operations phase of the project, these effects would be lower in intensity, but they would be long-term in duration (over the life of the facility).

Long-term potential effects are expected to be greatest within 2 miles of the production pads, an area measuring approximately 8,000 acres per site. As a result, the applicant's proposed action to develop five pads could potentially affect the recreational experience, including values of solitude, quietude, naturalness, and wilderness, over approximately 40,000 acres. However, the recreational use of the Plan Area is very low, and most recreation occurs directly along the Colville River corridor where activities associated with Nuiqsut already have decreased the values of some of these recreational activities.

Therefore, actual effects to the recreational experience would be minor and would primarily be limited to activity associated with development across the Nigliq Channel, where there would be a decrease in opportunities associated with solitude, quietude, naturalness, and wilderness. Recreational opportunities in the Plan Area would remain consistent with the BLM's SPM classification.

ABANDONMENT AND REHABILITATION

While abandonment and rehabilitation activities are occurring, the small number of recreational users in the area of CPAI's development could have their experience diminished by noise, marred views, and disturbance to animals that they have come to observe (bird watchers) or harvest (fish and game). If upon completion of abandonment, roads are left in place and made available for the public, there would be greater access opportunities, especially if recreationists are able to utilize the airstrip at Alpine Field.

4A.4.7.2 Alternative A – Full-Field Development Scenario Impacts on Recreation Resources

Under FFD, the effects on hunting, fishing, and birding opportunities and the qualities of solitude, quietude, naturalness, and wilderness would be the same as those described for the Alternative A – CPAI Development Plan, as described previously. However, the potential for such effects would increase under this alternative as a result of the increased geographic scope of development. In addition to the potential effects on approximately 40,000 acres from the applicant's proposed action, the recreational opportunities on up to an additional 192,000 acres could be affected if as many as the 24 proposed processing or production pads are developed.

Actual effects to users would be greatest from the development of production pads, such as hypothetical pads HP-8 and HP-11, near the Colville River. Pads projected under FFD, particularly near the Colville River, and especially those near or above Nuiqsut, would increase the potential for indirect, short-term effects to recreation. These effects would mainly be from increased noise disturbance by aircraft traveling to and from the pad locations.

The noise associated with aircraft could alter wildlife movement, affecting hunting and bird-viewing opportunities in the Plan Area, specifically near HP-8 and HP-11. Because the species sought by big game hunters tend to roam over large areas within and near the Plan Area, and because the number of big game hunters visiting the Plan Area is small, no long-term effects on hunting under this alternative would be expected. However, there would likely be long-term effects to the solitude, quietude, naturalness, and wilderness (birding opportunities) values within approximately 2 miles of new facilities.

Overall, potential effects on recreation in the Plan Area would be localized (near new facilities), and no regional effects above current conditions would be expected.

4A.4.7.3 Alternative A – Summary of Impacts (CPAI and FFD) on Recreation Resources

Construction and operation of the facilities proposed under Alternative A (CPAI and FFD) in the Plan Area are not expected to result in more than local adverse effects to the lightly used recreational resources of the Plan Area.

4A.4.7.4 Alternative A – Potential Mitigation Measures (CPAI and FFD) for Recreation Resources

No mitigation measures for recreation have been identified.

4A.4.7.5 Alternative A – Effectiveness of Protective Measures for Recreation Resources

There are no Northeast National Petroleum Reserve-Alaska IAP/EIS stipulations that apply to recreation resources and this EIS does not identify potential mitigation measures for recreation.

4A.4.8 Visual Resources

4A.4.8.1 Visual Analysis Methodology

The visual analysis methodology includes three elements: (1) definition of management distance zones, which relates to how close or distant features are to likely viewers; (2) contrast ratings, or how much change results from new features in the visual landscape; and (3) photographic simulations of typical views with and without the proposed project facilities.

VISUAL RESOURCE MANAGEMENT DISTANCE ZONES

Distance from an object affects how well elements of a landscape are perceived, with visible details of a particular object decreasing with increasing distance. The VRM system recognizes three distance zones:

- **Foreground and Middle-Ground Zone.** This is the area that can be seen from a travel route for up to 5 miles. The outer boundary of this distance zone is defined as the point where the texture and form of individual plants are no longer apparent in the landscape.
- **Background Zone.** This is the remaining area that can be seen from a travel route to approximately 15 miles. It does not include areas in the background that are so far distant that the only thing discernible is the form or outline. To be included within this distance zone, vegetation should be visible at least as patterns of light and dark.
- **Seldom-Seen Zone.** These are areas that are not visible within the foreground, middle ground, and background zones, and areas beyond the background zones.

CONTRAST RATINGS

For the ASDP, a visual effect is considered adverse if a proposed project element (such as a drill rig) creates a strong contrast with the elements of the natural landscape. The BLM defines contrasts in the following manner.

- **None.** The element contrast is not visible or perceived.
- **Weak.** The element contrast can be seen but does not attract attention.
- **Moderate.** The element contrast begins to attract attention and begins to dominate the characteristic landscape.
- **Strong.** The element contrast demands attention, will not be overlooked, and is dominant in the landscape.

For the following analysis, major infrastructure elements associated with the proposed developments were evaluated for the amount of contrast with the elements of the natural landscape. To aid in this assessment six visual simulations of different infrastructure elements were developed.

SIMULATIONS OF POTENTIAL CONTRASTS

KOPs are the most likely locations (communities, cabins, travel routes) where viewers would be able to observe the proposed project and would be visually affected by its presence. Initially, 24 KOPs located throughout the Plan Area were considered for preparation of visual simulations. From those 24, six were initially selected and ultimately three were chosen. It was decided that the three that were eliminated (KOP 3, 14, and 18) were unrepresentative of potential visual impacts for analyses. Three were selected for impact analysis, KOP 12, 20, and 21. These KOPs were spread across much of the Plan Area and were selected to represent the 24 KOPs in the visual simulations. For each of these three KOPs, visual simulations were prepared and evaluated for the amount of visual contrast within the characteristic landscape. Simulations were conducted using BLM standards for visual simulations representing what would be seen through a 50mm camera lens. Table 4A.4.8-1 lists the

4A.4.9.4 Alternative A – Potential Mitigation Measures (CPAI and FFD) for Transportation

To address the potential safety hazard associated with electric lines on 60-foot poles, these poles could be marked according to normal FAA requirements for structures above 200 feet. This could consist of red lights on the poles and high-visibility markers on lines where appropriate.

Most bridge construction activities will be conducted when the impacted waterways are frozen. If not, the applicant should work with local village and other vessel operators in order to facilitate marine navigation during construction. If bridge construction activities requires limiting vessel traffic, the applicant should issue sufficient notification of such closures to reduce conflict with marine navigation activities. A condition of the applicant's Coast Guard Bridge permit will require that construction of falsework, cofferdams or other obstructions, if required, shall be in accordance with plans submitted to approved by the Commandant prior to construction of the bridges. All work shall be so conducted that the free navigation of the waterway is not unreasonably interfered with and the present navigational depths are not impaired. Timely notice of any and all events that may affect navigation shall be given to the District Commander (Seventeenth District) during construction of the bridges.

4A.4.9.5 Alternative A – Effectiveness of Protective Measures for Transportation

There are no Northeast National Petroleum Reserve-Alaska AP/EIS stipulations that apply to transportation resources and there were no mitigation measures developed in this EIS.