

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

INTRODUCTION

The Department of the Air Force (DAF) and the U.S. Army (Army) (“Services”) have issued this Record of Decision (ROD) for the *Final Environmental Impact Statement for Proposed Mortar and Artillery Training at Richardson Training Area, Joint Base Elmendorf-Richardson, Alaska* (FEIS; Federal Register Vol. 90, No. 79, EIS Number 20250045, page 17431, April 25, 2025). The DAF manages Joint Base Elmendorf-Richardson (JBER) and is responsible for ensuring National Environmental Policy Act of 1969 (NEPA) compliance actions on JBER as the supporting component, while the Army retains operational responsibility for training areas and ranges and is the action proponent¹ as the supported component.²

The DAF is the lead agency and the Army and National Marine Fisheries Service (NMFS) are cooperating agencies for coordination and preparation of the EIS and ROD.

This ROD is issued in accordance with NEPA and reflects the Services’ consideration of the information, analyses, and public comments contained in the FEIS, along with other relevant matters. The FEIS is incorporated by reference.

This ROD documents:

- The Services’ decisions;
- Alternatives considered;
- The environmentally preferable alternative;
- Factors considered in the decision;

¹ The DAF defines the proponent including each office, unit, or activity at any level that initiates actions and is responsible for complying with NEPA and ensures integration of the NEPA during the initial planning stages of proposed actions so that planning and decisions reflect environmental values, delays are avoided later in the process, and potential conflicts are precluded.

² “*The supported Component [Army] will initiate NEPA review of proposed actions as the proponent and follow supporting Component [DAF] NEPA directives and processes,*” Memorandum of Agreement between Air Force (supporting component) and Army, (supported component), PDF page 41, Annex G(i), Environmental, 5 Oct. 2009.

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

- Whether the Services adopted all practicable means to avoid or minimize environmental harm from the selected alternative, and if not, why not; and
- Mitigations.

DECISION SYNOPSIS

As the proponent, the Army will implement Alternative 1 to increase military readiness by optimizing recurring indirect live-fire weapons training, qualification, and certification at JBER to meet home station training requirements in accordance with current Army training doctrine. Furthermore, the Army will modify winter firing restrictions at Eagle River Flats Impact Area (ERF-IA), reinstate all-season indirect live-fire training and qualification, add 155-millimeter (mm) artillery to the authorized weapon systems at JBER, and expand ERF-IA into 585 acres of adjacent upland. The maximum number of rounds fired into ERF-IA is expected to increase from an estimated 7,087 to 15,270 rounds per year. Protective measures and mitigations to avoid or reduce impacts to Cook Inlet beluga whales (*Delphinapterus leucas*) and other resources will be implemented as part of the action. With this decision, the Army anticipates at least one to two construction seasons before the expansion area is ready for use, nonetheless, the Army intends to allow units to begin all-season firing in the existing ERF-IA as soon as practicable.

ALTERNATIVES CONSIDERED

The Services carried forward for full analysis two action alternatives and a No Action Alternative (*FEIS* § 2.3).

Alternative 1. Under Alternative 1 the Army will reinstate indirect live-fire training at ERF-IA, use 155-mm artillery during training at ERF-IA, and expand the impact area into adjacent upland at JBER, Alaska.

Impact Area Expansion. ERF-IA will be expanded from 2,483 acres to roughly 3,068 acres. Construction in the 585-acre upland expansion area will entail clear-cutting approximately 359 acres of vegetation and creating approximately 1.8 miles of 15-foot-wide gravel service roads and five 50-foot-by-50-foot vehicle gravel service pads inside the cleared area. A 16-foot-wide, 3-mile firebreak will be created and maintained along the boundary of the cleared area. The

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

cleared area will be maintained with regular prescribed burns. An approximately 226-acre vegetation buffer will be retained and thinned, with no more than a third of the basal area of trees removed from the buffer. (*FEIS* § 2.4.1.1, page 2-17; Figure 2.4-1, page 2-19).

Qualification and Training. Expanding the impact area, reinstating all-season indirect live-fire training and qualification, and adding 155-mm artillery to the authorized weapon systems at JBER will allow the Army to complete Combat Training Center prerequisites, including company Combined Arms Live Fire Exercises (CALFEXs), at home station (*FEIS* § 2.4.1.2, pages 2-17 to 2-20). Indirect weapon systems fired at ERF-IA will include 60-mm, 81-mm, and 120-mm mortars, and 105-mm and 155-mm artillery. High explosive, illumination, smoke, and training rounds will be fired. The likely maximum number of rounds fired at ERF-IA will increase to 15,280 (*FEIS* § 2.6, Table 2.6-1, page 2-37). This alternative includes built-in protective measures for Cook Inlet beluga whales and other resources (*FEIS* § 2.4.1.3, pages 2-20 to 2-25).

Alternative 2. Under Alternative 2 the Army would not expand ERF-IA and some travel to Fort Wainwright would be needed to receive the full benefit of a CALFEX and allow soldiers to experience realistic wartime conditions (*FEIS* § 2.4.2.1, page 2-26). The same likely maximum number of rounds (15,280) would be fired as under Alternative 1, but all would be fired into the existing ERF-IA boundary (*FEIS* § 2.6, Table 2.6-1, page 2-37). This alternative includes the same built-in protective measures as Alternative 1 (*FEIS* § 2.4.2.1, page 2-26).

No Action Alternative. The No Action Alternative serves as the baseline for evaluating impacts of the action alternatives. Under the No Action ERF-IA would continue to be used at the current operations tempo and with the same seasonal restrictions and current habitat buffers. Seasonal firing restrictions would continue to limit training at ERF-IA to winter months and requiring travel to Fort Wainwright (*FEIS* § 2.4.3 and subsections, pages 2-26 to 2-31). 155-mm artillery would not be used at JBER, and approximately 7,087 rounds other than 155mm would be fired at JBER annually (*FEIS* § 2.6, Table 2.6-1, page 2-37). Existing habitat buffers would remain in effect (*FEIS* § 2.4.3.2, pages 2-30 to 2-31).

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The No Action Alternative is the environmentally preferred alternative because it has the lowest potential for adverse environmental impacts. Under this alternative, however, the benefits associated with reduced travel to Fort Wainwright, including reduced vehicle emissions (*FEIS* §§ 3.2.2.2 and 3.2.2.3, pages 3-22 to 3-25), reduced risks to soldier safety (*FEIS* §§ 3.4.2.2 and 3.4.2.3, pages 3-35 to 3-37), reduced use of the off-base transportation network (*FEIS* §§ 3.12.2.2 and 3.12.2.3, pages 3-185 to 3-186), reduced risk of vehicle spills (*FEIS* §§ 3.15.2.2 and 3.15.2.3, pages 3-197 to 3-198), lower travel-related costs, and improved soldier quality of life (*FEIS* §§ 3.13.2.2 and 3.13.2.3, pages 3-188 to 3-189), would not be realized.

COORDINATION AND CONSULTATION

As described more completely in the *FEIS* (*FEIS* §§ 3.1, 3.4.2, 3.5.2, and 3.14.2; *Appendix B*, *Appendix C*, and *Appendix D*), the DAF coordinated and completed consultations with federal, state, and local agencies during the EIS process. The DAF invited federally-recognized Alaska Native Tribes and Alaska Native Corporations that are historically affiliated with JBER to consult on all proposed undertakings that have the potential to affect properties of cultural, historical, or religious significance to the Alaska Native Tribes and Alaska Native Corporations.

Endangered Species Act (ESA) Section 7 Consultation with NMFS – The DAF informally consulted with NMFS, which determined that incidental take of marine mammals is not reasonably likely to occur in consideration of the Cook Inlet beluga whale, Western distinct population segment Steller sea lion (*Eumetopias jubatus*), and designated habitat for Cook Inlet beluga whale (*FEIS Appendix D*). NMFS issued a Letter of Concurrence for the BA on July 9, 2025, finding that the proposed action (with mitigation) is not likely to adversely affect listed species or critical habitat. (*FEIS Appendix B*).

Magnuson-Stevens Fishery Conservation and Management Act, Essential Fish Habitat (EFH) Determination with National Oceanic and Atmospheric Administration Fisheries – The DAF consulted with NMFS on potential impacts to federally managed fisheries in March 2020 (*FEIS Appendix B*) and prepared an EFH Assessment (*FEIS Appendix E*). The EFH Assessment

RECORD OF DECISION
*ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA*

determined that the proposed action may adversely affect EFH and/or managed fish and their habitat. NMFS agreed with the conclusion of effects and the mitigation measures and provided additional conservation recommendations, to which the DAF responded to by letter (*FEIS Appendix B*), concluding formal consultation in October 2024.

National Historic Preservation Act Section 106 Compliance in Coordination with the Alaska State Historic Preservation Officer (SHPO) – The DAF initiated consultation with the Alaska SHPO in 2021, as the proposal could adversely affect cultural resources eligible for the National Register of Historic Places. The SHPO agreed. Mitigations were developed in consultation with Alaska Native Tribes, the Advisory Council on Historic Preservation, Alaska SHPO, and the Municipality of Anchorage Historic Preservation Commission, as detailed in the Programmatic Agreement (PA; *FEIS Appendix I*).

Government-to-Government Consultation – The DAF invited six Tribal entities potentially affected by the proposed action to consult on all proposed undertakings that have a potential to affect properties of cultural, historical, or religious significance to Federally Recognized Tribes and Alaska Native entities in April 2020. Outreach included notification letters describing the project and requesting Government-to-Government consultation, with additional follow-up outreach by telephone and email (*FEIS Appendix B*, Table B-1). No responses to the DAF’s request for Government-to-Government consultation were received.

MITIGATION

The FEIS outlines mitigation measures to avoid, minimize, or compensate for environmental impacts, including (1) built-in protective measures, (2) best management practices (BMPs) and standard operating procedures (SOPs) required by regulation, (3) mitigation identified during EIS development, and (4) additional measures considered (*FEIS § 3.0*, pages 3-1 to 3-2). Each resource area in the EIS describes resource-specific mitigation measures identified to address potential impacts associated with each alternative. Unavoidable impacts that cannot be mitigated by the proponent are identified in the EIS. Pertinent mitigation measures in the four categories described above to reduce potential impacts of the alternatives are included in the individual resource sections of the EIS.

RECORD OF DECISION
*ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA*

Protective measures built into the action have already been committed to in the EIS and therefore are not listed out separately as mitigations in this ROD. Pertinent BMPs and SOPs would continue to be followed and are not included in this ROD. Within 90 days of the signature of this ROD, the Services will develop a Mitigation Plan to monitor and enforce the mitigation measures listed in Attachment A.

The Mitigation Plan will:

- Identify specific mitigative actions;
- Identify the organization responsible for each mitigation;
- Present the timing for execution of the mitigations; and
- Identify the process by which mitigations will be monitored.

Consultations with the relevant agencies resulted in prescribed mitigation and/or minimization measures. Those measures are provided in detail in Appendices B and C of the FEIS, which include correspondence with NMFS, and are listed in ROD Attachment A. For the identified impacts, the following measures are being taken:

- Ensure compliance with the actions listed in Appendix A of the NMFS January 2025 letter stating that an incidental take authorization under the Marine Mammal Protection Act is not necessary (*FEIS Appendix B*).
- Ensure compliance with the requirements outlined in the NMFS 2025 Letter of Concurrence (*FEIS Appendix B*).
- Ensure compliance with the mitigation measures outlined in the EFH Assessment (*FEIS Appendix E §§ 5.1.1 and 5.1.2*).
- Ensure compliance with mitigation measures detailed in the PA (*FEIS Appendix I*).

The Services will ensure implementation of mitigation measures to avoid, minimize, or compensate for environmental impacts associated with the proposed mortar and artillery training and associated impact area expansion (*ROD Attachment A*).

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

FINDING OF NO PRACTICABLE ALTERNATIVE

Pursuant to Executive Order 11988, *Floodplain Management*, and Executive Order 11990, *Protection of Wetlands*, and considering all supporting information, the Services find no practicable alternative to locating the proposed action in floodplains and wetlands, as analyzed in the FEIS (§ 3.6, pages 3-51 and 3-53 to 3-57, and § 3.7, pages 3-59 to 3-69). Live-fire training is constrained to the area inside ERF-IA's boundaries, which includes the Eagle River floodplain and extensive wetland acreage. ERF-IA has been used for weapons training since the 1940s and is currently the only dedicated impact area at JBER, making relocation of the action infeasible.

DECISION

The Services have carefully considered the potential environmental consequences of the alternatives analyzed in the FEIS along with public and stakeholder comments. The Services also considered factors related to national defense, including mission support, infrastructure, weather, capacity, environmental criteria, cost, and military plans.

By implementing the mitigation measures identified in this ROD and adhering to the Mitigation Plan described herein, the Services have adopted all practicable means to avoid or minimize environmental harm.

The Services will, by this decision, proceed with Alternative 1, all-season live-fire training, use of 155-mm artillery, and expansion of ERF-IA at JBER, in accordance with the above discussion and the FEIS. Soldiers will regain the ability to conduct quarterly, semi-annual, and periodic indirect live-fire training across all seasons and weather conditions utilizing the expanded ERF-IA, and units will be able to conduct CALFEX live-firing proficiency exercises at JBER using a full array of weapons systems and munitions (excluding white phosphorus munitions). The Services have adopted all practicable means to avoid or minimize environmental harm.


COMMENTS ON THE FINAL EIS

The services did not receive any comments on the comments after the publication of the Final EIS. Supplementation is therefore not required.

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

SIGNATORIES

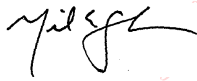
I certify that the Army has considered all alternatives, information, analyses, and objections submitted by commenters.


JOHN P. COGBILL
Major General, U.S. Army
Commanding General, 11 Airborne Division

Date 17 MAR 26

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

I certify that the DAF has considered all alternatives, information, analyses, and objections submitted by commenters.



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MICHAEL E. SAUNDERS, P.E., SES, DAF
Principal Deputy Assistant Secretary of the Air Force
(Energy, Installations, & Environment)

Date 27 Mar 26

RECORD OF DECISION – ATTACHMENT A
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

ATTACHMENT A – MITIGATION MEASURES THAT ARE TO BE IMPLEMENTED AND
 CARRIED FORWARD AS DIRECTED IN THIS RECORD OF DECISION

| Resource Areas | FEIS Section(s) | Mitigation |
|---|---|--|
| Air Quality | 3.2.2.5, page 3-26 | Following initial clearing of the proposed expansion area, use non-burning methods of slash disposal to the degree practicable (Alternative 1). |
| Air Quality; Wildland Fire; Forest Resources | 3.2.2.5, page 3-26; 3.9.2.5, page 3-152; 3.16.2.5, page 3-205 | Provide fire suppression resources with UXO and impact area maps to use when planning suppression response if an ignition is detected. |
| Air Quality; Wildland Fire | 3.2.2.5, page 3-26; 3.9.2.5, page 3-152 | Conduct pile-burning of logging slash after the onset of fall rains or during the spring prescribed burn window, which occurs between loss of snow cover and green-up (Alternative 1). |
| Earth Resources; Water Resources; | 3.5.2.5, page 3-46; 3.6.2.5, page 3-58; | Prohibit use of delay fuzes to minimize ground penetration. |
| Terrestrial Wildlife; Special Status Species; | 3.8.2.3, page 3-128; 3.8.2.5, page 3-144; 3.10.2.5, page 3-165; | Make GIS-based tables and a map of remediated areas in ERF-IA available to the units that train at ERF-IA. |
| Subsistence; Hazardous Materials/Waste | 3.15.2.5, page 3-199 | If an errant round strikes a gravel cap, assume damage and place gravel in the affected area when practicable. |

RECORD OF DECISION – ATTACHMENT A
ENVIRONMENTAL IMPACT STATEMENT
 PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
 JOINT BASE ELMENDORF-RICHARDSON, ALASKA

| Resource Areas | FEIS Section(s) | Mitigation |
|--|---|--|
| Water Resources; Fish; Terrestrial Wildlife; Marine Mammals; Special Status Species; Subsistence | 3.6.2.5, page 3-58; 3.8.2.2, page 3-116; 3.8.2.3, page 3-128; 3.8.2.4, page 3-140; 3.8.2.5, page 3-144; 3.10.2.5, page 3-165 | Expand the protective measure that specifies limited fire periods for HE rounds to include 155-mm training rounds. This means that 155-mm training rounds, like full HE rounds, would not be fired into inundated areas during inundating tide events and would not be fired into ERF during the seasonal closure period (9 August through 18 October); 155-mm training rounds could still be fired into the proposed expansion area during this time. |
| Water Resources; Fish; Marine Mammals; Special Status Species; Subsistence | 3.6.2.5, page 3-59; 3.8.2.2, page 3-116; 3.8.2.4, page 3-140; 3.8.2.5, page 3-144; 3.10.2.5, page 3-165 | Continue fisheries harvest management, population studies (annual salmon enumeration studies), and habitat protection efforts at Sixmile Lake, Eagle River, and Otter Creek to ensure fish resources are effectively managed on JBER. Maximize use of the expansion area to reduce impacts to areas where juvenile fish may be present and during the height of salmon runs (mid-June through August) (Alternative 1). |
| Wetlands | 3.7.2.5, page 3-70 | Appropriately compensate for unavoidable adverse impacts to wetlands through participation in an approved off-site mitigation bank or in-lieu fee instrument (if needed). |

RECORD OF DECISION – ATTACHMENT A
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

| Resource Areas | FEIS Section(s) | Mitigation |
|---|--|---|
| Vegetation; Special Status Species | 3.8.2.1, page 3-107; 3.8.2.5, page 3-144 | Conduct preliminary treatment for management of existing invasive plant species populations and continue regular monitoring and treatment as needed (Alternative 1). |
| Fish; Marine Mammals; Special Status Species; Subsistence | 3.8.2.2, page 3-116; 3.8.2.4, pages 3-139 to 3-140; 3.8.2.5, page 3-144; 3.10.2.5, page 3-165 | <p>Continue to evaluate rearing and residency of juvenile salmon and/or other fish species using trap surveys and/or eDNA (or other methods as appropriate) to monitor productivity in and adjacent to the ROI, as practicable.</p> <p>During ice-off conditions, ensure that for each weapon fired (mortar and artillery), the weapon system impact area (target area, 8PE, and 12PE portions of SDZ) does not overlap habitat protective buffers, Eagle Bay, or Eagle River.</p> <p>During ice-off conditions, ensure that for each weapon fired (mortar and artillery), Areas A, B, and C of the SDZ do not overlap portions of Eagle Bay, Eagle River, or Otter Creek that have 130- or 500-meter buffers.</p> <p>During ice-off conditions, for portions of Upper Eagle River, Otter Creek, and the Otter Creek complex that have a 50-meter buffer, ensure that for artillery, Areas A, B, and C of the SDZ do not overlap the river/creek.</p> |

RECORD OF DECISION – ATTACHMENT A
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

| Resource Areas | FEIS Section(s) | Mitigation |
|--|---|--|
| | | <p>During ice-off conditions, for portions of Upper Eagle River, Otter Creek, and the Otter Creek complex that have a 50-meter buffer, ensure that for mortars, Area B of the SDZs does not overlap the river/creek. For mortars that overfly the river/creek, ensure the minimum safety distances in DA Pam 385-63 are applied to areas that overlap the river/creek.</p> |
| <p>Terrestrial Wildlife; Special Status Species; Subsistence</p> | <p>3.8.2.3, page 3-128; 3.8.2.5, page 3-144; 3.10.2.5, page 3-165</p> | <p>Monitor responses of birds to noise disturbance at ERF to inform future bird aircraft strike management decisions.</p> |
| <p>Marine Mammals; Special Status Species; Subsistence</p> | <p>3.8.2.4, page 3-140; 3.8.2.5, page 3-144; 3.10.2.5, page 3-165</p> | <p>Implement a Mitigation and Monitoring Plan to include a year-round marine mammal monitoring program per the 2025 Letter of Concurrence. Annual reporting will include a synthesis of visual and acoustic data collection techniques.</p> |
| <p>Cultural Resources</p> | <p>3.10.2.5, page 3-165</p> | <p>If previous cultural surveys of the proposed expansion are more than 10 years old, complete a new survey to evaluate NRHP eligibility of cultural resources present prior to construction (Alternative 1).</p> |

RECORD OF DECISION – ATTACHMENT A
ENVIRONMENTAL IMPACT STATEMENT
PROPOSED MORTAR AND ARTILLERY TRAINING AT RICHARDSON TRAINING AREA,
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

| Resource Areas | FEIS Section(s) | Mitigation |
|------------------|----------------------|--|
| | | <p>Implement protective measures to prevent impacts to eligible historic properties in the proposed expansion area, including vegetation buffers at least 200 feet around affected properties, placement of barriers along the vegetation buffer, prohibiting training and maintenance activities within 200 feet of properties, and monitoring of site conditions annually (Alternative 1).</p> |
| | | <p>Prepare a data recovery plan that includes excavation and systematic subsurface testing to identify stratified features and activity areas at the four NRHP-eligible archaeological sites in the proposed expansion area and implement the plan prior to construction (Alternative 1).</p> |
| | | <p>Implement the Inadvertent Discovery, Unanticipated Effects, and Discovery of Human Remains protocols, as described further in the Programmatic Agreement.</p> |
| Forest Resources | 3.16.2.5, page 3-205 | <p>Conduct pile-burning on-site before winter snow prohibits burning or hydroax/mulch/chip as an alternative to burning (Alternative 1).</p> |

Key: DA Pam = Department of the Army Pamphlet; ERF = Eagle River Flats; ERF-IA = Eagle River Flats Impact Area; FEIS = Final Environmental Impact Statement; JBER = Joint Base Elmendorf-Richardson; GIS = Geographic Information System; HE = high explosive; mm = millimeter; NRHP = National Register of Historic Places; ROI = Region of Influence; SDZ = Surface Danger Zone; UXO = unexploded ordnance