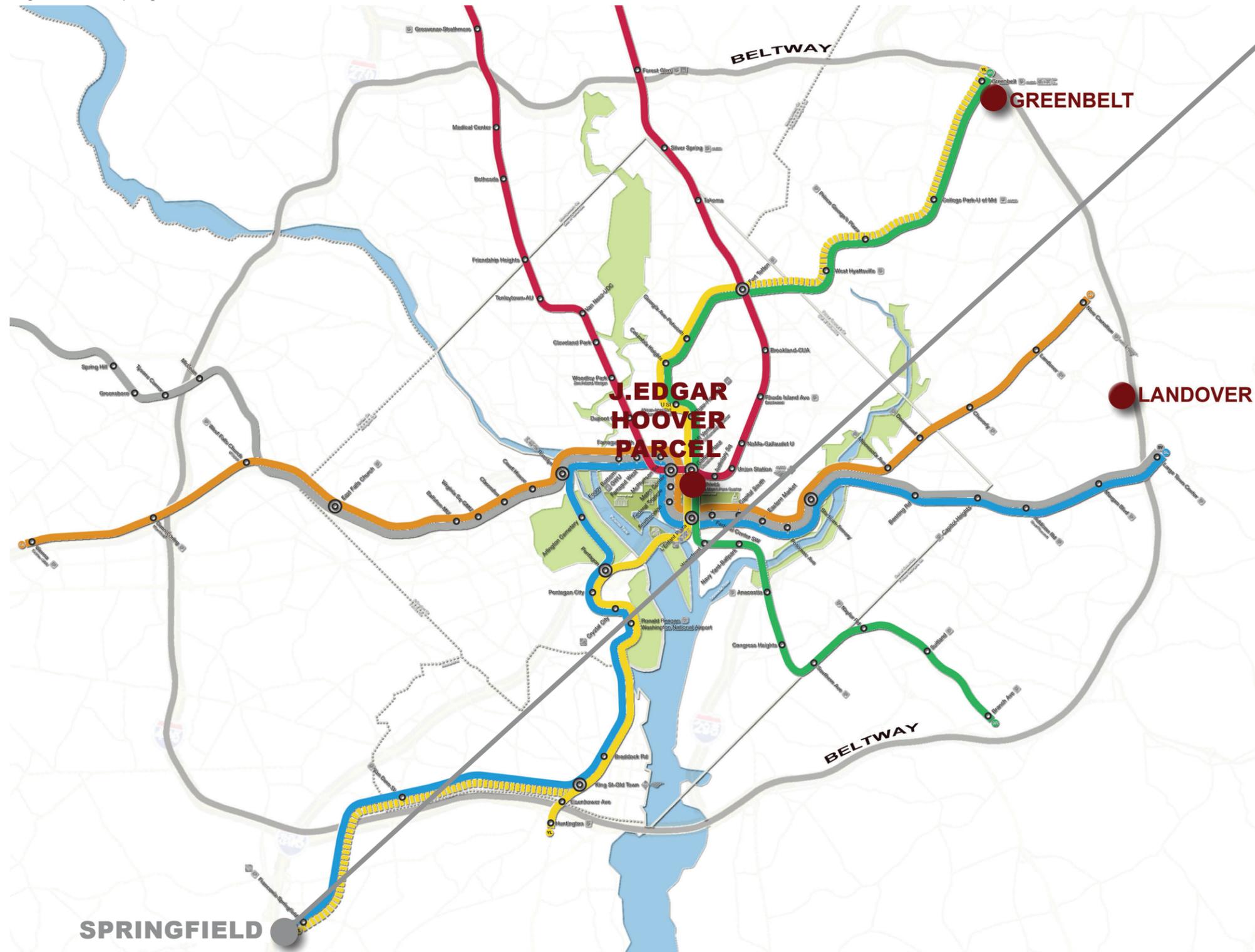


Figure ES-9: Springfield Site Overview



Springfield Site

- Approximately 58 acres
- Owned by GSA
- Currently houses GSA warehouse and a tenant agency
- Three-tenths of a mile from the Joe Alexander Transportation Center- the southern terminus station on the Metrorail Blue line also served by the Yellow line during rush hour. It is well served by regional and local bus routes, and the Virginia Railway Express (VRE) commuter train providing service between Fredericksburg and Washington, D.C.
- Site would be accessed via an extension of Frontier Drive. Trucks would access the site from Loisdale Road.
- Main building developable Area: 9.3 acres
- Assumed main building height: Up to 12 stories/180 feet tall
- Visitor Parking: 145 spaces
- Employee Parking: 2 8-story structures containing approximately 3,600 employee parking spots
- A substation would not be required
- Shuttle bus to provide service to Franconia-Springfield Metro Station

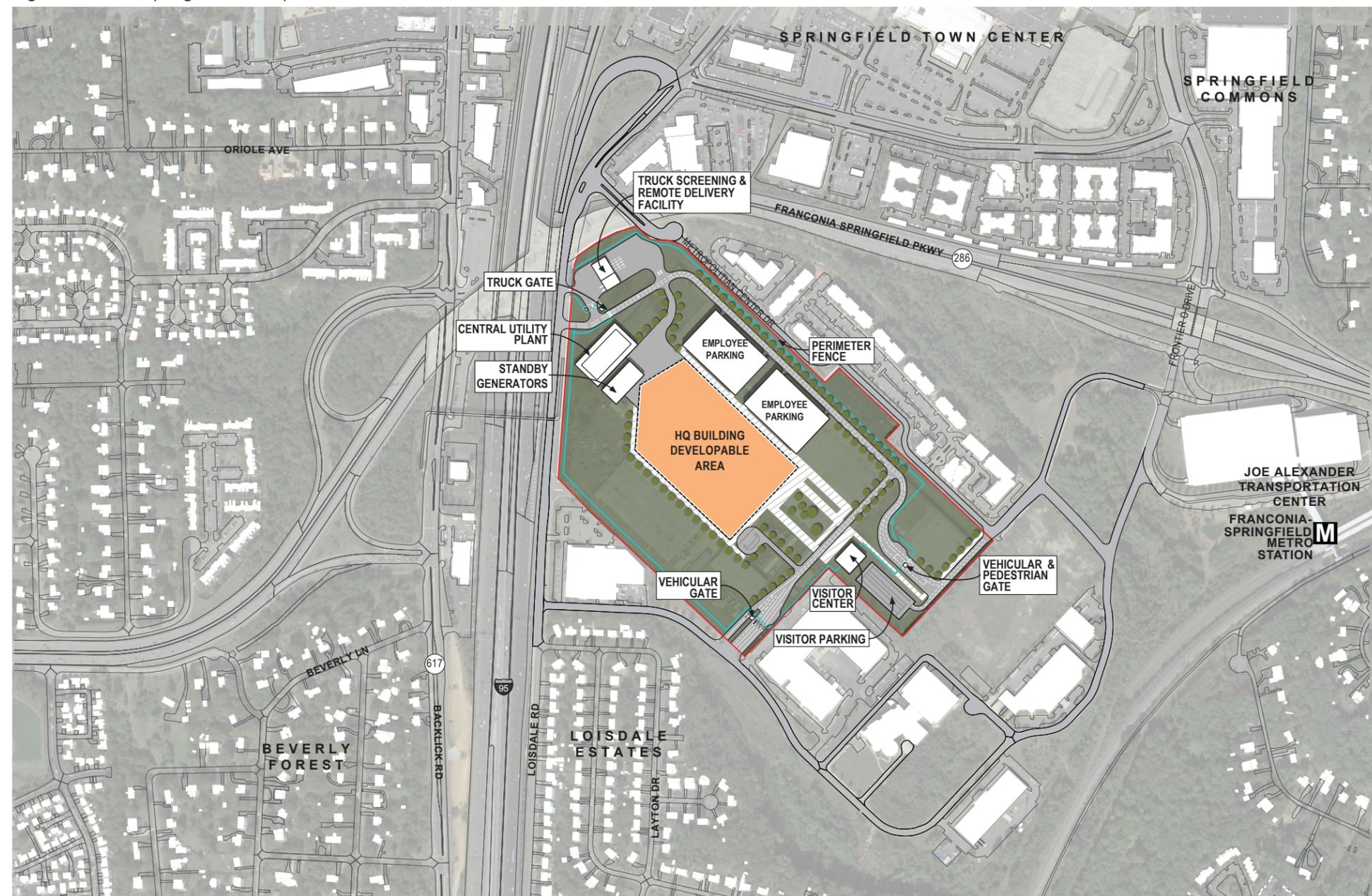
Springfield

The Springfield site (figure ES-9) comprises approximately 58 acres located at the site of the GSA Franconia Warehouse Complex on a portion of a parcel owned by GSA (Figure ES-10). Potential sites for the relocation of the compound tenants have not been identified. If the Springfield site is selected, GSA will prepare the appropriate NEPA documentation for the relocation. The site is three-tenths of a mile from the Joe Alexander Transportation Center. This transportation hub contains the Franconia-Springfield Metro Station, the southern terminus station on the Metrorail Blue line, which is also served by the Yellow line during rush hour. Additionally, it is well served by regional and local bus routes, and the Virginia Railway Express (VRE) commuter train providing service between Fredericksburg, VA and Washington, D.C.



GSA Franconia Warehouse Complex - Building A

Figure ES-10: Springfield Conceptual Site Plan



J. Edgar Hoover (JEH) Building

Two Reasonably Foreseeable Development Scenarios (RFDSs), and accompanying site activities, were hypothesized for the future private redevelopment of the JEH parcel in order to provide templates for analysis of the site prior to the identification of the end user. These conceptual redevelopment scenarios, known as RFDS 1 and RFDS 2, were based on (A) what is viewed as the most likely primary use of the site, and (B) a potential reuse that would yield the most conservative results for analysis (or a worst-case scenario in terms of impact). The RFDSs in this EIS are an estimate of what could be reasonably developed on the JEH parcel in the foreseeable future based on PADC guidelines and D.C. zoning requirements

It is important to underscore that the RFDSs are conceptual in nature and have been developed for analysis purposes only. They do not serve as GSA's recommendation or proposal for the future use, development, or design of the JEH parcel.

RFDS 1 is the adaptive reuse of the existing JEH building and is similar to the No-action Alternative as it would continue to support 5,000 employees. The development of RFDS 2 was informed by local development and market trends as well as applicable land use and zoning controls.

RFDS 1

Under RFDS 1, after the JEH parcel is conveyed from Federal ownership to the selected exchange partner, the existing building would be renovated using the existing footprint and building shell. The existing multi-story (7 stories on Pennsylvania Avenue side, 11 stories on the E Street Side), 2.4 million gsf building would undergo major interior renovations to complete necessary upgrades for continued commercial use. Additionally, due to the existing condition of the facade, some level of exterior facade repair would be required under RFDS 1. The site would continue to support approximately 5,000 daily employees during a regular work week and include a parking garage with approximately 800 parking spaces. RFDS 1 is similar to the No-action Alternative.

RFDS 2

Under RFDS 2, after the JEH parcel is conveyed from Federal ownership to the selected exchange partner, the existing building would be demolished, and the parcel would be redeveloped. Based on recent local development and market trends in the downtown D.C. area, it is unlikely that one large building would be constructed. For this conceptual analysis, the following assumptions were made:

- The parcel would contain multiple buildings with pathways between them for pedestrian access.
- Vehicular circulation is unlikely to occur inside the parcel except as necessary to service the buildings.
- There would be a mix of commercial and residential uses with ground floor retail space.
- Future development would be consistent with limits on building heights, setbacks, intensity, and use found in the proposed Washington, D.C. Office of Planning (DCOP) D-7 zoning, Height of Buildings Act, and the 1974 Pennsylvania Avenue Plan (PAP).

Based on these assumptions, and building out the site to its highest market-reasonable density, RFDS 2 would theoretically include the following elements (see table ES-2) distributed across 5 buildings ranging from 12 to 14 stories.

RFDS

An RFDS is essentially a “what-if” development scenario for future private redevelopment. It is GSA’s estimate of what could be reasonably developed by a private developer on the parcel in the foreseeable future. **The RFDSs are not GSA’s suggestions or proposals for future use or design of the JEH parcel and have been developed in this EIS for environmental impact analysis purposes only.**

Under **RFDS 1**, after the FBI occupies a new, permanent FBI HQ at one of the three sites under consideration, the JEH parcel would be conveyed to the selected exchange partner, who would then implement an adaptive reuse of the existing building for private commercial use.

Under **RFDS 2**, after the FBI occupies a new, permanent FBI HQ at one of the three sites under consideration, the JEH parcel would be conveyed to the selected exchange partner, who would then demolish the existing building and redevelop the parcel so as to maximize development capacity for private commercial use.

Table ES-2: RFDS 2 Components

Use	Size (gsf)	Details
Ground Floor Retail	173,000 gsf	
Commercial Office	1,400,000 gsf	12 stories
Residential	750,000 gsf	14 stories / 1,066 units
Parking	260,000 gsf	800 spaces

Parcel Specifics	Description
Parcel Area	290,000 sf
Floor Area Ratio (FAR)	8.03

Public Involvement

Public involvement is one of the cornerstones of the NEPA process. As specified in Title 40 CFR Part 1500.1(b), NEPA requires Federal agencies to make diligent efforts to involve the public before reaching a project decision. Public input is critical to allow public officials to make informed decisions. There are several opportunities throughout the EIS process for the public and government agencies to be informed about the Proposed Action and provide input to the U.S. Government.

The Notice of Intent (NOI) was published in the Federal Register on September 8, 2014 to notify the public of GSA's intent to prepare an EIS for the proposed FBI HQ Consolidation. The publication of the NOI initiated the scoping process, which is a procedural requirement of NEPA that serves to identify the full range of environmental issues and alternatives to be evaluated in an EIS (40 CFR. § 1501.7). The scoping process provides an opportunity for the public and agencies to learn about the Proposed Action, alternatives, and comment on potential environmental issues to be addressed in the EIS. The public scoping comment period began on September 8, 2014, with the publication of the NOI and continued through October 23, 2014. Open-house style public meetings were held at the following locations:

- Springfield, Virginia: Robert E. Lee High School on September 22, 2014
- Greenbelt, Maryland: Greenbelt Branch Library Auditorium on September 23, 2014
- Existing FBI HQ: District Architecture Center on October 1, 2014
- Landover, Maryland: Prince George's Sports and Learning Complex on October 2, 2014

The public and agencies were notified of the scoping period and scoping meeting through publications in the Federal Register, advertisements in local newspapers, the project website (<http://www.gsa.gov/fbihqconsolidation>), via social media as well as scoping letters and mailings to interested parties. Refer to Chapter 9 for a detailed summary of the scoping activities and other public involvement undertaken for the project.

During the preparation of the Draft EIS, GSA and the FBI have consulted with numerous agencies and organizations to provide information of the proposed undertaking, identify potential issues and solicit information related to the preparation of the Draft EIS. The following agencies were consulted during the preparation of this Draft EIS:

FEDERAL

- Advisory Council on Historic Preservation (ACHP)
- Federal Highway Administration (FHWA)
- U.S. Commission of Fine Arts (CFA)
- U.S. Environmental Protection Agency (EPA)
- National Park Service (NPS)
- U.S. Fish & Wildlife Service (USFWS)
- U.S. Army Corps of Engineers (USACE)
- National Capital Planning Commission (NCPC)

STATE

- DC State Historic Preservation Office (DC SHPO)
- DC Office of Planning (DCOP)
- DC Department of Transportation (DDOT)
- Maryland State Highway Administration (Maryland SHA)
- Maryland Historical Trust (MD SHPO)
- Maryland Department of Business and Economic Development (MDBED)
- Maryland Department of Natural Resources (MDDNR)
- Maryland Department of the Environment (MDE)
- Virginia Department of Transportation (VDOT)
- Virginia Department of Historic Resources (VDHR)
- Virginia Department of Conservation & Recreation (DCR)

REGIONAL & LOCAL

- Fairfax County Department of Transportation (FCDOT)
- Maryland-National Capital Park and Planning Commission (M-NCPPC)
- Prince George's County Department of Public Works & Transportation (DPW&T)
- Washington Metropolitan Area Transit Authority (WMATA)

As a second opportunity for public input, agencies and members of the public are encouraged to provide written comments on the Draft EIS during the 45-day comment period.

Please send written comments on the Draft EIS to:

U.S. General Services Administration
Attention: Ms. Denise Decker, Project Manager
Office of Planning and Design Quality
7th Street SW, Room 4004
Washington, D.C. 20407

NEPA PUBLIC INVOLVEMENT PROCESS

Public Scoping

September 8, 2014, to October 23, 2014

Public Review of the Draft EIS

November 6, 2015, to January 6, 2016

Publication of the Final EIS and ROD

By end of 2016

Summary of Environmental Impacts

Direct Impacts: Occur at the same time and place as the Proposed Action.

Indirect Impacts: Occur later in time or are farther removed in distance but still reasonably foreseeable.

Cumulative Impacts: Result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

EXCHANGE OF JEH

- The exchange of the JEH parcel is a component of the Greenbelt, Landover, and Springfield Alternatives.
- The exchange itself would not result in any direct impacts.
- Reasonably Foreseeable Development Scenarios (RFDSs) are used to estimate indirect impacts from the exchange of JEH.

In accordance with Council on Environmental Quality (CEQ) regulations, direct, indirect, and cumulative impacts are assessed for each of the alternatives evaluated in the Draft Environmental Impact Statement (EIS). Direct impacts are defined as those that are caused by the action and occurring at the same time and place; while indirect impacts are defined as those reasonably foreseeable impacts caused by the action but occurring later in time or farther removed in distance. They include effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems (40 Code of Federal Regulations [CFR] §1508.8). Cumulative impacts are those that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions (40 CFR 1508.7).

These impacts are described in the following terms for each resource topic examined in the Draft EIS. This EIS does not attempt to assign one overall intensity, type, or duration for each resource topic under each alternative but to characterize a plurality of impacts.

Intensity

Intensity refers to the severity of impacts. The Draft EIS uses two intensity thresholds and also identifies where information is insufficient to make a determination.

Insufficient information: indicates that insufficient data exists to make a final conclusion with regards intensity and type, per 40 CFR 1502.22 (incomplete or unavailable information). Potential impacts are stated conditionally and qualitatively.

No Measurable impacts: indicates that the impact is localized and not measurable at the lowest level of detection.

Major impact: indicates the effect is severely adverse, highly noticeable, and considered to be significant.

Adverse and beneficial impacts that are measurable, but not major, are not assigned an intensity.

Type

Type describes the beneficial or adverse nature of the impact. Impacts that improve the state of a resource are considered beneficial, while impacts that degrade a resource are considered adverse.

Duration

Duration describes the temporal considerations of how long the impacts are expected to last. Short-term impacts are defined as either those associated with the construction period, or those lasting less than 1 year; while long-term impacts are defined as those occurring throughout the operational period of the consolidated headquarters (HQ).

Context

Context refers to the spatial and social scale over which impacts would occur. National Environmental Policy Act (NEPA) regulations require that the significance of an action be analyzed in several contexts, from the macro level (society, national) through the micro level (locality). The Draft EIS evaluates impacts for the site/parcel, locality, and regional level for each resource topic.

Significance

As required by section 102(2)(C) of NEPA, the Draft EIS must assess the significance of impacts. A determination of significance requires considerations of both the context and intensity of an impact. 40 CFR 1508.27 outlines the considerations used when evaluating the significance of an impact for both the natural and human environment. The EIS categorizes significant impacts as major, adverse impacts.

The exchange of the JEH parcel is a component of each action alternative. The real estate transaction transferring the JEH parcel from Federal government ownership into private ownership would not have any direct impacts at the same time and place as the Proposed Action. However, indirect impacts may occur later in time as a result of any future redevelopment of the JEH parcel. These impacts are evaluated using RFDS 1 and 2. GSA would no longer control the JEH parcel once the exchange occurs, and as such the analysis of the RFDS are less extensive than the site alternatives.

The methodology and assumptions used to evaluate impacts for each resource topic are described in chapter 3. The indirect impacts resulting from the exchange of the JEH parcel are discussed in section 4.2. The direct and indirect impacts resulting from the consolidation of FBI HQ are described in section 5.2, 6.2, and 7.2 for the Greenbelt, Landover, and Springfield sites, respectively. Cumulative impacts for each site alternative as well as the JEH parcel, including those associated with climate change, are discussed in chapter 8. Table ES-3 identifies the environmental impacts under all alternatives for each resource topic. For each resource topic, the intensity, type, and duration of impacts are described for the no-action and action alternatives for each site and the JEH parcel. Each impact is further assigned a color code as follows:

- **Gray (N):** No Measurable Impact or Insufficient Information
- **Yellow (ADV):** Adverse Impact (includes both short- and long-term)
- **Red (MAJ ADV):** Major Adverse. These impacts are considered significant under section 102(2)(C) of NEPA (includes both short- and long-term)
- **Green (BEN):** Beneficial impact (includes both short- and long-term)

Table ES-3: Summary of Environmental Impacts

Resource Area	JEH RFDS		Greenbelt		Landover		Springfield	
Earth Resources								
Geology and Topography	N	Under the No-action Alternative, there would be no measurable impacts to geology or topography.	ADV	Under the No-action Alternative, there would be indirect, short-term, adverse impacts to topography and indirect, long-term, adverse impacts to geology.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts to geology or topography.	N	Under the Greenbelt Alternative, there would be no measurable impacts.	ADV	Under the Landover Alternative, there would be direct, short- and long-term, adverse impacts.	ADV	Under the Springfield Alternative, there would be direct, short-term, adverse impacts to topography.
	N	Under RFDS 2, there would be no measurable impacts to geology or topography.					ADV	Under the Springfield Alternative, there would be direct, long-term, adverse impacts to geology.
Soils	N	Under the No-action Alternative, there would be no measurable impacts.	ADV	Under the No-action Alternative, there would be indirect, short-term, adverse impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	ADV	Under the Greenbelt Alternative, there would be indirect, short-term, adverse impacts.	ADV	Under the Landover Alternative, there would be direct, short-term, adverse impacts.	ADV	Under the Springfield Alternative, there would be direct, short-term, adverse impacts.
	ADV	Under RFDS 2, there would be indirect, short-term, adverse impacts.						
Water Resources								
Surface Water	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	BEN	Under the Greenbelt Alternative, there would be direct, long-term, beneficial impacts.	N	Under the Landover Alternative, there would be no measurable impacts.	N	Under the Springfield Alternative, there would be no measurable impacts.
	N	Under RFDS 2, there would be no measurable impacts.						

N	No Measurable Impact or Insufficient Information	ADV	Adverse Impact	MAJ ADV	Major Adverse (Significant) Impact	BEN	Beneficial Impact
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Table ES-3 Summary of Environmental Impacts (continued)

Resource Area	JEH RFDS		Greenbelt		Landover		Springfield	
Hydrology	N	Under the No-action Alternative, there would be no measurable impacts.	ADV	Under the No-action Alternative, there would be indirect, short-term, adverse impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	ADV	Under the Greenbelt Alternative, there would be direct, short-term, adverse impacts.	ADV	Under the Landover Alternative, there would be direct, short-term, adverse impacts.	ADV	Under the Springfield Alternative, there would be direct, short-term, adverse impacts.
	ADV	Under RFDS 2, there would be indirect, short-term, adverse impacts.						
	BEN	Under RFDS 2, there would be indirect, long-term, beneficial impacts.	BEN	Under the Greenbelt Alternative, there would be direct, long-term, beneficial impacts.	BEN	Under the Landover Alternative, there would be direct, long-term, beneficial impacts.	BEN	Under the Springfield Alternative, there would be direct, long-term, beneficial impacts.
Groundwater	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no new measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	BEN	Under the Greenbelt Alternative, there would be direct, long-term, beneficial impacts.	BEN	Under the Landover Alternative, there would be direct, long-term, beneficial impacts.	BEN	Under the Springfield Alternative, there would be direct, long-term, beneficial impacts.
	N	Under RFDS 2, there would be no measurable impacts.						
Wetlands and Floodplains	N	Under the No-action Alternative, there would be no measurable impacts to wetlands and floodplains.	ADV	Under the No-action Alternative, there would be indirect, short-term, adverse impacts to wetlands.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
			N	Under the No-action Alternative, there would be no measurable impacts to floodplains.				
	N	Under RFDS 1, there would be no measurable impacts to wetlands and floodplains.	N	Under the Greenbelt Alternative, there would be no measurable long-term impacts to wetlands.	N	Under the Landover Alternative, there would be no measurable impacts.	N	Under the Springfield Alternative, there would be no measurable impacts.
	N	Under RFDS 2, there would be no measurable impacts to wetlands and floodplains.	ADV	Under the Greenbelt Alternative, there would be direct, short- and long-term, adverse impacts to floodplains.				

N	No Measurable Impact or Insufficient Information	ADV	Adverse Impact	MAJ ADV	Major Adverse (Significant) Impact	BEN	Beneficial Impact
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Table ES-3 Summary of Environmental Impacts (continued)

Resource Area	JEH RFDS		Greenbelt		Landover		Springfield	
Biological Resources								
Vegetation	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	BEN	Under the Greenbelt Alternative, there would be direct, long-term, beneficial impacts at the Greenbelt site.	BEN	Under the Landover Alternative, there would be direct, long-term, beneficial impacts.	BEN	Under the Springfield Alternative, there would be direct, long-term, beneficial impacts.
	ADV	Under RFDS 2, there would be indirect, short-term, adverse impacts.	ADV	Under the Greenbelt Alternative, there would direct, long-term, adverse impacts off-site.	ADV	Under the Landover Alternative, there would be direct, long-term, adverse impacts.	ADV	Under the Springfield Alternative, there would be direct, long-term, adverse impacts.
Aquatic Species	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	BEN	Under the Greenbelt Alternative, there would be direct, long-term, beneficial impacts.	N	Under the Landover Alternative, there would be no measurable impacts.	N	Under the Springfield Alternative, there would be no measurable impacts.
	N	Under RFDS 2, there would be no measurable impacts.						
Terrestrial Species	N	Under the No-action Alternative, there would be no measurable impacts.	ADV	Under the No-action Alternative, there would be indirect, short-term, adverse impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	ADV	Under the Greenbelt Alternative, there would be direct, long-term, adverse impacts.	BEN	Under the Landover Alternative, there would be direct, long-term, beneficial impacts.	BEN	Under the Springfield Alternative, there would be direct, long-term, beneficial impacts.
	ADV	Under RFDS 2, there would indirect, short-term, adverse impacts.			ADV	Under the Landover Alternative, there would be direct, short- and long-term, adverse impacts.	ADV	Under the Springfield Alternative, there would be direct, short- and long-term, adverse impacts.
Special Status Species	N	Under the No-action Alternative, there would be no measurable impacts.	ADV	Under the No-action Alternative, there would be indirect, short-term, adverse impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	ADV	Under the Greenbelt Alternative, there would be direct, long-term, adverse impacts.	N	Under the Landover Alternative, there would be no measurable impacts.	N	Under the Springfield Alternative, there would be no measurable impacts.
	N	Under RFDS 2, there would be no measurable impacts.						

N	No Measurable Impact or Insufficient Information	ADV	Adverse Impact	MAJ ADV	Major Adverse (Significant) Impact	BEN	Beneficial Impact
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Table ES-3 Summary of Environmental Impacts (continued)

Resource Area	JEH RFDS		Greenbelt		Landover		Springfield	
Regional Land Use, Planning Studies, and Zoning								
Regional Land Use, Planning Studies, and Zoning	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts to zoning.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
			BEN	Under the No-action Alternative, there would be indirect, long-term, beneficial impacts to land use.				
			ADV	Under the No-action Alternative, there would be indirect, long-term, adverse impacts to land use.				
	ADV	Under RFDS 1, there would be indirect, long-term, adverse impacts to land use and zoning.	N	Under the Greenbelt Alternative, there would be no measurable impacts to zoning.	N	Under the Landover Alternative, there would be no measurable impacts to zoning.	N	Under the Springfield Alternative, there would be no measurable impacts to zoning.
	BEN	Under RFDS 2, there would be indirect, long-term, beneficial impacts to land use and zoning.	ADV	Under the Greenbelt Alternative, there would be direct, long-term, adverse impacts to land use.	ADV	Under the Landover Alternative, there would be direct, long-term, adverse impacts to land use.	ADV	Under the Springfield Alternative there would direct, long-term, adverse impacts to land use.
BEN			Under the Greenbelt Alternative, there would be direct, long-term, beneficial impacts to land use.	BEN	Under the Landover Alternative, there would be direct, long-term, beneficial impacts to land use.	BEN	Under the Springfield Alternative, there would be direct, long-term, beneficial impacts to land use.	
Visual Resources								
Visual Resources	N	Under the No-action Alternative, there would be no measurable impacts.	ADV	Under the No-action Alternative, there would be indirect, long-term, adverse impacts.	N	Under the No-action Alternative, there would be no measurable impacts.	N	Under the No-action Alternative, there would be no measurable impacts.
	N	Under RFDS 1, there would be no measurable impacts.	MAJ ADV	Under the Greenbelt Alternative, there would be direct, long-term, major adverse impacts.	ADV	Under the Landover Alternative, there would be direct, long-term, adverse impacts.	ADV	Under the Springfield Alternative, there would be direct, long-term, adverse impacts.
	BEN	Under RFDS 2, there would be indirect, long-term, beneficial impacts.			BEN	Under the Landover Alternative, there would be direct, long-term, beneficial impacts.		

N	No Measurable Impact or Insufficient Information	ADV	Adverse Impact	MAJ ADV	Major Adverse (Significant) Impact	BEN	Beneficial Impact
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