

Committee on Resources

Subcommittee on National Parks and Public Lands

Testimony

Testimony of Theodore H. Streeter

Comments of the Gettysburg Borough Council Regarding the Proposed National Park Service General Management Plan/Environmental Impact Statement for the Gettysburg National Military Park

The Council of the Borough of Gettysburg has consistently viewed the proposed General Management Plan/Environmental Impact Statement (GMP/EIS) solely within the context of how the plan will effect the economic well being of the Borough and its citizens. To fully appreciate this, one must be aware of the factors which make Gettysburg unique economically.

To begin, the town of Gettysburg is inextricably associated with the battle and therefore essentially relies solely upon tourism for survival. However, unlike other small one industry towns, Gettysburg cannot replace its loss of livelihood with any new industry which will employ Borough residents to the extent that tourism now does.

The Borough of Gettysburg is also virtually surrounded by the Gettysburg National Military Park (GNMP). There is no room for expansion nor is annexation now permitted by state law. This situation restricts the tax base of the Borough to begin with, but the situation is further compounded by the location within the Borough of National Park Service (NPS) property, Gettysburg College, the Lutheran Theological Seminary, the Gettysburg Hospital and the Gettysburg Public schools, all of which render 51% of the property within the Borough tax exempt. Therefore the Borough must derive all its operating revenues from the remaining 49%.

Essentially, this means that less than half of a Borough of 7,000 persons is financing not only the Borough's operations, but is also providing infrastructure support for 1.7 million annual GNMP visitors, thus placing a significant additional burden on its resources. For example, the Borough's police force numbers 14 officers, almost three times as many as required for a town of similar size. When one adds to that the increased costs of street maintenance, trash collection, fire, ambulance, etc., one can understand the strain placed upon the Borough budget.

Additionally, the entire tax burden is levied upon a population consisting of more than 60% low to moderate income and nearly 25% senior citizens, many living on fixed incomes. Borough property tax rates are therefore of necessity disproportionately high - close to the limit permitted by state law and 67 times higher than those of surrounding townships immediately outside the GNMP. There is no way to compensate for this as the state tax code prohibits the Borough from raising revenue from a "pillow tax" and amusement taxes are frozen at current levels, also by state law.

The Borough Council has evaluated the proposed GMP/EIS with the foregoing criteria in mind and having done so believes that there are several aspects of the plan which require re-examination.

The first is the methodology used to compile the GMP/EIS. It is the understanding of the Borough Council that the document must be prepared in accordance with the intent of the National Environmental Policy Act (NEPA), Title I, Section 102, particularly with regard to the Council on Environmental Quality regulations

concerning the requirements of the lead agency (in this case the NPS). The Borough believes that these regulations require the NPS to rigorously explore and evaluate all reasonable alternatives available within the proposed action with discussion sufficiently detailed to allow the public an opportunity to evaluate the merits of the alternatives presented. Alternatives that would require legislative action or only offer a partial solution are not exempt from consideration.

The Borough believes that the proposed GMP/EIS does not fulfill NEPA requirements. The reader learns very early in the document (p. 23) that Alternative C (commonly known as the Kinsley proposal) is not only the chosen option, but that the mechanisms for implementing that option, i.e., purchasing the land and establishing a foundation, have already been set in motion. Thus, the decision to implement the Kinsley proposal was apparently made during the very initial stages of GMP/EIS preparation. Indeed, one could argue that the GMP/EIS was written to support the Kinsley proposal. This conclusion is corroborated by the refusal of the NPS during any of the several public meetings it hosted, to entertain any discussion of alternatives to Alternative C.

Secondly, the Borough is concerned that data compiled by the economics consulting firm of Thomas Martin and Company to support the Kinsley proposal may be flawed in three respects. Thomas Martin acknowledged that when putting together that data it performed an analysis of economic impact upon the area in general, but not upon Gettysburg itself. Additionally, Thomas Martin acknowledged that it had done no primary research, but had relied solely upon secondary data to arrive at its conclusions. Lastly, that secondary data was supplied entirely by the National Park Service.

The economic impact of the foregoing methodology upon the Borough is potentially devastating. By failing to entertain any alternatives to the Kinsley proposal, the NPS has excluded the possibility of locating some elements of the proposed Visitors Center, such as portions of the administrative, curatorial or interpretive components, within the historic district of the Borough. Consequently, any economic benefit (not to mention historic) to the Borough which might be derived from resulting increased visitation to the town is lost. The Borough Council does not consider this alternative to be unreasonable. Indeed, a succession of Presidential Executive Orders, most recently President Clinton's Executive Order #13006 (May 21, 1996), mandates that every effort be made to locate federal facilities in historic downtown districts.

Relocation of the proposed Kinsley Visitor Center one-half mile further away from the Borough is also a matter of serious concern. Since the current Visitors Center opened in 1972, approximately 110 businesses have established themselves within 2/5 of a mile, in what is known as the Steinwehr Avenue business district. Their locations have been largely determined by the ease of pedestrian access from the present Visitors Center and its adjacent parking. Construction of the Kinsley Visitors Center approximately one mile away and the concurrent elimination of parking facilities if/when the current Visitors Center is demolished will virtually eliminate that access with predictable effects on those businesses.

In addition to the obvious negative impact upon the Borough tax situation inherent in movement of the Visitors Center, the Council must point out a more personal effect of Visitors Center relocation. The vast majority of the businesses in question are small, family owned establishments - motels, gift shops, museums/tours, food service - employing three to five persons. Their owners have in some cases invested 25 years in building them. The potential loss of revenue, livelihood and everything they have worked for is justifiably as much of a concern to them as it is to the Borough.

Virtual elimination of pedestrian access to the Borough is not the only concern inherent in movement of the Visitors Center. The Kinsley proposal alludes to certain retail activities to be housed within the proposed

Visitors Center, among which are a food service facility. Details concerning the facility, i.e., what it will serve, its capacity, etc., have not been forthcoming despite repeated requests. The potential effect upon similar facilities within the Borough, however, is clear.

The Thomas Martin study projects that construction of the Kinsley Visitors Center will attract close to two million visitors annually to the GNMP. Martin projects that of those, 75% (1.5 million) will utilize the Visitors Center and that 41% of that 1.5 million (615,000) will in some manner patronize the planned food service facility. Even projecting (generously) that one-third of those would be nothing more than soft drink purchases, this still means a loss to the Borough of 400,000 food transactions a year. This alone is devastating, but when the loss of "spin-off" transactions, i.e., gifts, museum visits, etc., is added, the effects are multiplied.

In its introduction, this paper stated that the Borough view of the GMP/EIS has been consistently from the standpoint of its economic impact. One can appreciate from the foregoing why this is so. The Borough has also been consistent in qualifying its opposition to the Kinsley proposal. That is, the Council has always felt that certain changes to the proposal could make it more acceptable to the Borough without significant adverse effect to Alternative C. Among Borough proposals, for instance, have been establishing a meaningful NPS presence in the Borough; rehabilitating, rather than destroying, the current Visitors Center, to include retention of adequate parking and therefore access to Steinwehr Avenue; and, elimination of food service at the Kinsley Visitors Center. In light of the previous discussion, these proposals are not considered to be unreasonable. To date, however, NPS has shown no inclination to deviate from its pre-determined course of action.

Although not within its purview, the Council feels compelled to point out that concern over the GMP/EIS extends far beyond the Borough's economic well being. Various groups have also expressed strong reservations about the historic, cultural, environmental, ecological and traffic management aspects of the document, some even to the point of initiating legal action..

The Borough Council cannot emphasize too strongly that it, as well as the groups just cited, believe that enhancement of GNMP visitor facilities is not only desirable but mandatory if the park is to retain its attractiveness as a site of national prominence. Nor does the Council discount the concept of public-private cooperation to achieve enhancement. However, since the proposed GMP/EIS is intended not only to serve as a prototype document for other facilities in the NPS system, but will affect the GNMP and the Borough for at least the next quarter century, the Council believes that no artificial time constraints should be imposed.

Therefore, the Borough Council recommends that the GMP/EIS be re-examined in its totality, under NEPA criteria, with full and equal participation by all interested parties and that any constraints upon the time necessary to do so be removed.

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