

No Casino Gettysburg,
[REDACTED]

March 29, 2006

Chairman Thomas Decker
PA Gaming Control Board
P.O.Box 69060
Harrisburg, PA 17106-9060

Dear Chairman Decker,

I am enclosing 419 signed petitions, addressed to you, from No Casino Gettysburg. Of these petitions, 217 are from citizens of Adams County, 107 are from citizens of other Pennsylvania counties, and 95 are from citizens in other states.

They are meaningful petitions, because each signer had to download the petition from the computer, sign 4 separate statements and mail them to our P.O Box so that they might be forwarded to you, Governor Rendell, Representative John Perzel, and Sen. Pro Tempore Robert C. Jubelirer.

The petition states, "I strongly oppose the awarding of a casino gambling license in or near the historic town of Gettysburg, our most sacred Civil War site. I respectfully urge you to use your legislative leadership with other legislators to achieve a 'No' Vote from the Gaming Control Board. No! to the desecration of the graves of those who fought in Gettysburg so that 'this nation, under God, might have a new birth of Freedom!'"

In addition to these petitions specifically intended for you, 4 copies of petition sheets have been given to the Gaming Control Board in preparation for the hearing to be held at Gettysburg College April 5th. These number 24,695 total signatures on our petition opposing casino gambling in Gettysburg, PA of which 17,318 are from Pennsylvania. More petitions come in daily and will be added to the final total. Each signature is counted, copied and tabulated as accurately as possible.

No Casino Gettysburg is a grass roots organization, a voluntary group of citizens, devoted solely to keeping casino gambling out of our historical community. I trust that this effort and these figures will lead you to believe the depth of our commitment to keep Gettysburg, which belongs to the nation, free of a gambling casino for past, present and future generations.

Respectfully,

Muriel L. Rice

Muriel L. Rice, Vice-chair
No Casino Gettysburg

Petitions on file

IN Office of the Clerk

3/8/06

TO BOARD:

I AM VERY MUCH AGAINST
HAVING CASINO & SLOT MACHINES
IN THE GETTYSBURG AREA. I DONT
TAKE MY CHILDREN TO SEE THEM,
I WANT GETTYSBURG TO BE AN HISTORICAL
TOWN, NOT ONE GIVEN OVER TO HOTELS
& GAMBLING PLACES

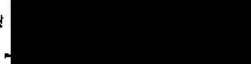
Sincerely
Richard Bennett

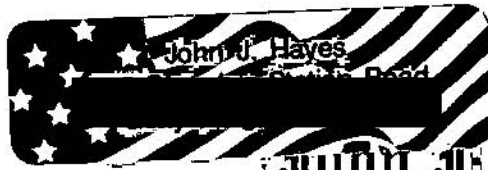
Gentlemen: I never got a chance to sign
~~the petition against~~
Please do NOT grant Crossroads
Casino a license in Gettysburg. It
is an insult to the historical
aspects of the area. It will bring
overwhelming traffic congestion
& drunken drivers on our roads. It
will ruin our country life.

Connie Herron
local resident



Connie Herron





4/20/06.

John J. Hayes

Gettysburg, PA

To whom it may concern,

I'm writing this letter in hopes that you'd consider another site than Gettysburg for the planned casino.

My family moved here 15 years ago because of the quite charm of Gettysburg! The town was a living connection with our countries past. Everywhere you looked there was an example of our countries heritage.

There are many sites in Pa. that would fit the bill for a casino but there is only one Gettysburg (a national shrine).

John J. Hayes

Gettysburg, PA

Please don't dishonor those
who shed their blood here by
putting in a casino. We all
know that a casino is just
the beginning of a downward
slide. Once the camel has its
nose in the tent it's just a
matter of time before the rest
of him follows.

Sincerely,
J. J. Hayes



Tom Miller



Dear Sir,

I would like to
state my negative vote
on the Gettysburg Casino
plan.

Thank you,

John S. Miller

The Hilton Family



Reservations: www.hilton.com or 1 800 HILTONS

DRAFT REGULATIONS COMMENT FORM

Please complete all of the fields below before printing:

DATE 05/25/2006 ADDRESS
SECTION # OR SUBJECT Gettysburg Casino ADDRESS
FIRST NAME Paul and Catherine CITY
LAST NAME Pacak STATE
ORGANIZATION NAME Private Citizens ZIP CODE
EMAIL ADDRESS COUNTY
TELEPHONE

COMMENTS

Dear Sirs:

As new residents of PA, we totally support ALL the reasons AGAINST the casino in Gettysburg. The most compelling argument is the water situation. We saw this in New Jersey as developers put up and are planning to put up over 150 new homes within a one mile circle of our old farm. We immediately began having water problems as all the new wells were being drilled and had to install a \$5000 water treatment system to have safe and acceptable water. With 80% of Adams County on wells, any big development will be a problem.

We left NJ because of political corruption, property taxes going from \$8000 to \$17,500, out of control land development, the extremely high cost of living, and the destruction of a rural farm community that exploded into 3 times its original size in about 15 years. On May 16, 2006 the citizens of PA showed at the polls they have had it with the business as usual attitude of the political system and hopefully we will be heard loud and clear that a casino has no business in this beautiful, rural, peaceful, and historical place named Gettysburg.

Thank you

Paul and Catherine Pacak
Paul and Catherine Pacak

DRAFT REGULATIONS COMMENT FORM

Please complete all of the fields below before printing:

DATE ADDRESS

SECTION # OR SUBJECT ADDRESS

FIRST NAME CITY

LAST NAME STATE

ORGANIZATION NAME ZIP CODE

EMAIL ADDRESS COUNTY

TELEPHONE

COMMENTS

The Nation regards Gettysburg and its battlefield as occupying a unique place in our history, and the addition of a casino would only demean that special regard. Moreover, we residents of the area regard this as a quiet country, farming and education community.

Gambling establishments (casinos) have a single interest: to make money. Despite fancy promises of immediate benefit to the community, in the long run, any seemingly positive effects of those benefits would diminish or disappear altogether. Costs of the services that must be provided by the community to the casino - police protection, health, transportation -- would only increase and outweigh any so-called benefits.

A casino does not belong near Gettysburg, Pennsylvania !

Comments may be submitted to the Board by U.S. Mail at the following address:

Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060
Attn: Public Comment

Ken Farabaugh office

Pennsylvania Gaming Control Board
P O Box 69060
Harrisburg, Pa 17106-9060

Dear Board Members

Thank you for the opportunity to address you. I am a life long resident of Pennsylvania. My wife and I have resided in Adams County since 1969. I am a financial services representative.

Since the expansion of gambling has been passed by our state, it is a forgone conclusion that casinos will be placed throughout the state. Let me also state that **Adams County, in particular Gettysburg, is not the place.**

I am on the Board of Directors of the Gettysburg Adams Chamber of Commerce that approved by a vote of 7 to 6 of an 18-member board, to support the Crossroads proposal. The motion only ended up being approved because one member who had not attended any meeting during the year voted in favor under misunderstandings. He actually thought that if the Chamber voted to stay neutral that it would cause the Borough to not get the one million promised by President of Crossroads David Levan. I found out this reason from him after the meeting. When he realized the real situation he felt used by the supporters of the vote in favor. **I urge you to not be impressed by the Chambers endorsement of the project.**

I attended the two hearings held at Gettysburg College and listened to all of the testimony. I believe you to be astute business people. Other than the presentation by Crossroads, the testimony given in favor was poorly presented and lacked substance. Many also have either financial or business connections to Mr Levan.

On the other hand the overwhelming number of groups and individuals opposing should speak volumes. The majority gave thoughtful and poignant testimony. While the casino would not be on the battlefield it would be in Gettysburg. Not in the borough but it would have a Gettysburg address. We do have a sacred trust to preserve the Gettysburg name and what it represents.

My wife and I have worked with the Rotary Youth Exchange program for 19 years. We have sent out and received over 80 students around the world for a year long study. The majority of the students and families before coming here know Gettysburg and the Gettysburg Address.

It is up to you to decide what legacy will be left in the name of Gettysburg. I pray that you will see fit to locate the 2 stand alone casinos in areas other than Gettysburg.

Thank you for your consideration in this matter.

Ken Farabaugh



May 22, 2006

Dear Mr. Decker, and the members of the PGCB:

We respectfully request that the Pennsylvania Gaming Control Board disqualify Crossroads Gaming Resort and Spa as an applicant for a Category 2 license. Crossroads does not meet your criteria for community support, as demonstrated by Gettysburg's three hearings. We ask that you disqualify them as of the close of the public input period, June 2.

Gettysburg now faces the second summer tourist season with this painful controversy unresolved. Historic Gettysburg, and its all-important Heritage tourist economy, deserves better.

Please, we beg of you, put an end to the bitter strife in this beautiful town sooner, rather than later.

Thank you so much for reading this.

Sincerely yours,

Dan and Jean Siderio



Dan Siderio
Jean Siderio

Gettysburg

RECEIVED

MAY 30 2006

DRAFT REGULATIONS COMMENT FORM

Please complete all of the fields below before printing:

DATE 05/25/2006

ADDRESS

SECTION # OR SUBJECT RE: Proposed Gettysburg location

ADDRESS

FIRST NAME Linda

CITY

LAST NAME Devlin

STATE

ORGANIZATION NAME

ZIP CODE

EMAIL ADDRESS

COUNTY McKean County

TELEPHONE

COMMENTS

Dear Sir,
I am strongly advocating that a gambling establishment not be built in the Gettysburg area. Gettysburg is a premier Civil War site, and the history of the United States and of the Commonwealth of Pennsylvania should not be destroyed by mixing an entertainment venue that features gambling at an internationally recognized heritage site.

The image of a community is fundamentally important, the context in which a historic site is located is as important as the site itself.

Sincerely,
Linda Devlin
Linda Devlin



Pennsylvania
Gaming Control Board



WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Harold G. Gobrecht

Address:

Telephone:

Organization, if any:

Employer: Harover Hospital

COMMENTS: (Please use second page if more space is required)

I'm NOT in Favor of a gambling
Casino in Adam's Co. or Any place

Harold G. Gobrecht



Pennsylvania
Gaming Control Board

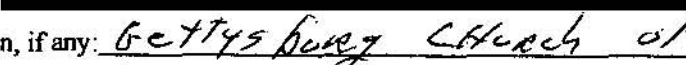


WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: JANICE M STAHL

Address: 

Telephone: 

Organization, if any: GETTYSBURG CHURCH OF CHRIST

Employer: RETIRED

COMMENTS: (Please use second page if more space is required)

I don't believe we need gambling
in the Gettysburg area.

Janice M Stahl



**Pennsylvania
Gaming Control Board**



**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Kevin D. Biesecker

Address

Telephone

Organization, if any: _____

Employer: Federal Government

COMMENTS: (Please use second page if more space is required)

see attached sheet.

Over the past ten years Adams County has seen many changes. Of course some have been for the good and so for the not so good. We have seen a rise in the number of hotels and motels that allow visitors to have an easier time in finding accommodations. Thus, while I have no statistics, it seems that we have more tourists visiting Gettysburg. These benefits have a cascade effect for all businesses in the area. On the other side, the Park Service destroyed a privately owned observation tower. While only providing a few jobs, this tower did provide in excess of \$80,000 of tax money to the local school in the form of an amusement tax. Plus, it also contributed to the state sales tax and county property taxes. Due to the Park Service, the community and the state are deprived of all of this. Also, on the down side of changes, the county had the opportunity to have a large warehouse operation built just off of Route 15. This opportunity was pushed out when it was found that there would be 500 truck operations a day from the facility.

I do not like change to our county over all. But I do believe that certain changes are necessary and will do the county good. The biggest two things this county needs is jobs and the Park Service to stop grabbing land and taking it off the tax rolls. What land the Park Service does not strip away can be used for commercial development. Commercial development will give us jobs, jobs that we can use to support our families with.

Now while I do support commercial development, I do not support the planned casino in Gettysburg. Many have touted that it will bring jobs to Gettysburg. I agree that it will, but not the kind of jobs this county needs. It will not bring large numbers of family supporting jobs. For these types of jobs we will still have to travel to York County, Maryland, Virginia or the District of Columbia. Using common sense, these casinos will bring in low paying jobs, a high transient population, and increased crime. It does not take much to look to places like Atlantic City, NJ or Las Vegas, NV to see the kind of problems that will be encountered.

For four years I lived in Panama City, FL and dealt with the high transient population that was attracted to that area. I saw the problems that this caused. I find it distressing that Panama City now is trying to become the "spring break capital" of Florida. You would think that they could see why Daytona and other cities no longer wanted the types of problems that went along with the title. It seems that they can not and last year when we visited the area we could see the decline that is occurring. Our county should step back and look to examples like these to see where we will end up.

Just so my position on this matter is very clear, I do NOT want or support a casino in Adams County. I do not think that a casino will in anyway help an over whelming majority of citizens. It's benefits in taxes will not offset it's costs. Help us get the things that will help our community such as power plants, factories and other commercial endeavors that do not involve gambling. Thank you.



**Pennsylvania
Gaming Control Board**



**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Laura R. Bishop

Address

Telephone

Organization, if any: _____

Employer: _____

COMMENTS: (Please use second page if more space is required)

I am a 19 year old college student who is attending school in Tampa, Florida. I grew up in and around Gettysburg all of my life especially after living in the city of Tampa for the past year, greatly looked forward to the prospect of returning to this area after receiving my Bachelor's in Elementary Education. The construction of a casino in or near Gettysburg, however, would cause me to



**Pennsylvania
Gaming Control Board**



**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Meghan Bishop

Address:

Telephone:

Organization, if any:

Employer: Indiana University

COMMENTS: (Please use second page if more space is required)

I am a 24-year-old graduate student. In one year I will be graduating with a Master's degree, and although I love my home state of Pennsylvania, and would like to return here to work, the construction of a casino near Gettysburg, PA would make me seriously reconsider accepting a job in this location.

Meghan Bishop



May 30, 2006

Office of the Clerk
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17101

I do not believe approval of a casino at Gettysburg would be beneficial for the Gettysburg area or for the Commonwealth of Pennsylvania. In addition to negative publicity related to disrespect for a national treasure, over-optimistic projections of local and Commonwealth revenue, and probable decline of heritage visitors due to incompatible clientele, I also anticipate the area's infrastructure would require major overhaul due to the introduction of various law enforcement, traffic, social, and other problems. This area is not equipped to absorb the onslaught and could not be so equipped without inordinate investment of individual, corporate, and tax dollars. These are among reasons why the majority (based on several polls) of local residents and current visitors have no interest in the negative adaptations necessary to live with a casino in our midst.

One example of these infrastructure problems involves dependence on wells for most water used in Adams County, including Straban Township. My comments which follow draw from the water management planning study done in 1981, titled "Groundwater Resources of Adams County, PA", by the Office of Resource Management, PA Dept of Environmental Resources. The Adams County Conservation District office verified for me today the current validity of the study information.

Adams County is at the headwaters of the Chesapeake Bay watershed. All streams in the county originate within the county. The Gettysburg area receives an average of 39.3 inches of precipitation per year. Twenty four inches are lost to evaporation, most of the rest is lost through stream or overland outflow within a few days of falling. A small fraction of our precipitation seeps into the Triassic Aquifer to become the groundwater into which our wells are drilled, normally near the point of consumption to hold down costs. Aquifer production averages roughly 186,000 gallons per square mile per day. This is idealized production since, due to the disparity of consumers, it is virtually impossible to locate wells to maximize water production. Our residents and visitors contended with water restrictions during portions of last year and have experienced a period of controlled water use already this year. These periods of restricted use seem to be increasingly common.

The proponents' estimate of casino visitation is 3,000,000 per year. Taking the average use per person here of 153 gallons per day (drinking, cooking, flushing, spa and swimming pool fills, cleaning, etc.), this level of added arrivals would require 1.25 million additional gallons of water per day, which would consume 6.75 square miles of aquifer under conditions of average precipitation and perfect water retraction. Placing the casino beside the well(s) providing this water would mean less or no water for over three miles from the casino in all directions. This

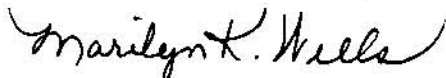
7 7

area would overlap with the high-water usage areas of surrounding businesses such as the Gettysburg Gateway complex and the nearby Reliant electrical energy plant, which itself reportedly requires almost four square miles of aquifer water, to power steam driven generators, when operating at full capacity.

There are numerous accounts saying Gettysburg area wells ran dry during the battle here in 1863. Even though similar numbers of men, horses, and mules participated in other civil war battles, the shortages of water is one of the reasons the battle here stands out in accounts of the war. The proposed casino complex is not expected to bring the same sudden huge influx as did the battle; however, neither would the overpowering continuance of casino visitors cease to use water after three days. The July 1-3, 1863 experience serves as a reminder of the effects of geometric increases in population and resultant water usage when wells, rather than more reliable rivers or reservoirs, are the water source. It could be expected that a solution to this problem, such as a pipeline from the Susquehanna River, would be expensive and would require Commonwealth and Federal subsidization. But this is only one of several major changes reasonably to be expected if a casino were built and, contrary to most expectations here, dramatically increased visitation numbers without concurrently reducing heritage visits.

If a casino at Gettysburg were approved, we, including Pennsylvania's taxpayers as a whole, would be called upon to pay for an extremely burdensome casino-support infrastructure. This is unnecessary since more of the needed infrastructure will be already in place elsewhere. I respectfully request that the Crossroads casino application be denied.

Sincerely,



Marilyn K. Wells



**Pennsylvania
Gaming Control Board**



**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Catherine Bishop

Address:

Telephone:

Organization, if any:

Employer:

COMMENTS: (Please use second page if more space is required)

I am a 16-year-old highschooler from Biglerville. I love living here in Adams County and I have hoped to continue living here an adult. If a casino is built in Gettysburg, however, I will not want to raise my children in the environment that will come with it. I sincerely oppose a casino ~~to~~ being built near or around Gettysburg.

Catherine Bishop

**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**
on CROSSROADS GAMING ; Chance ENTERPRISES,
Gettysburg, PA
I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: JOHN + LINDA WEIXEL

Address: 

Telephone: 

Organization, if any: _____

Employer: RETIRED

COMMENTS: (Please use second page if more space is required)

— PLEASE SEE ATTACHED —

To The Pennsylvania Gaming Control Board:

We would like to register our strong objection to the licensing of a Slot machine casino in Gettysburg, PA.

In your deliberations, please ask yourselves:

What would Abraham-Lincoln think of this proposal?

How would those who fought and died here for us feel about it?

How will we explain this to our grandchildren?

Gettysburg is the most significant historical treasure in the State of Pennsylvania and perhaps the entire country. Surely it must be apparent to you that a Casino is not appropriate for this area.

Please, please don't do this.

Sincerely,

John Weixel Linda Weixel

John Weixel & Linda Weixel





Pennsylvania
Gaming Control Board



WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Leanna Borling

Address:

Telephone:

Organization, if any:

Employer: homemaker

COMMENTS: (Please use second page if more space is required)

Please do not bring the gaming industry to Gettysburg. I believe it to be a destructive force and a force that would profane the ground where so many men fought and died. We love our community and the history that is so much a part of our nation. Please listen to the voice of reason and deny the petition to bring gaming here.



Pennsylvania
Gaming Control Board



**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Jonathan E. Crawford

Address:

Telephone:

Organization, if any: _____

Employer: Starting small business

COMMENTS: (Please use second page if more space is required)

COMMENTS: (Please use second page if more space is required)

Dear Gentlemen,

I am currently 17 years old, but I will be turning 18 on July 12th and will be voting in the elections this November. I live in Lancaster County and travel to Gettysburg weekly to attend church. I **OPPOSE** a gambling in Gettysburg, below is a partial list of reasons why:

- Gambling is extremely addictive and destroys families
- There is the promise of many new jobs, which is put forth as a good thing (Whether there is any need for more jobs is debatable). Let's suppose that the promised jobs come through, what type of jobs will they be? There will of course be the workers for the casino and hotels, but there will also be more demand for bars, prostitute houses, and illegal drugs; with these and others, there will also be an increased need for police and security guards (many at the cost of the tax payers). Ultimately, we must ask are these the type of jobs we want more of?
- For a picture of some of the detriment that gambling brings, allow me to show you what I have seen from Las Vegas, Nevada.
 - My Grandmother lives there and she cannot trust anyone. She will not allow any repairmen into her house because they would rob her. She hired someone paint the exterior of her house and although they took full payment for the job, they only painted from the ground to seven feet up and then lightly misted the entire second floor.
 - My aunt and uncle, who also live there, hired a contractor to remodel the house on their second property. The man did some work, took a large payment for the next phase and never returned. Although they knew where the man lived in the city, they could do nothing. This man, like many others, made his living lying to, cheating, and stealing from, people.
 - When my aunt took her children to church, each of her children had to have photo IDs to go to Sunday school class and she had to have an ID to pick them up.
 - No one can trust anyone. Stores require any person desiring to write a check to also have a Bank Guarantee Card, meaning that the bank guarantees to pay the store if the check bounces. This is to protect themselves against the countless bouncing checks.


I am currently starting a small business and could potentially move my business to Gettysburg, but if a gambling moves in, I will NOT. When people are trying to "Get Rich Quick" there is no place for honest businesses or raising families. The things I have mentioned and more, worse things will come to Gettysburg if we allow gambling. Please vote no!

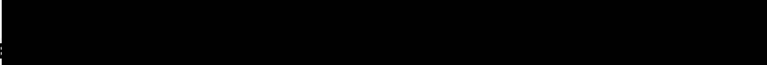
Sincerely and Respectfully Yours,

Jonathan E. Crawford

**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS
ON CROSSROADS GAMING ; Chance ENTERPRISES,
Gettysburg, PA**
I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: ROBERT W. KOONS

Address: 

Telephone: 

Organization, if any: NA

Employer: RETIRED

COMMENTS: (Please use second page if more space is required)

I am opposed to locating in the area adjacent to Gettysburg of slot machines and other gambling facilities as well as the attendant accommodations which are proposed by Chance Enterprises as the Crossroads Gaming Project. My reasons are multiple; chief among them are the following.

- ① Such a gambling development would fracture the geographic ambience and the cultural identity of the community. It would be antithetical to the purposes and the culture now so strongly identified with the two educational institutions in Gettysburg.

preservation of one of the most sacred episodes of our patriotic heritage. Our reputation as a gambling mecca would tend to mar our image and experience as a place of sacred memory.

② The proposed financial gains would be based on principles that are in the end economically unsound. Of itself, gambling produces no goods or services which would contribute to our social well-being. To make a few rich at the expense of the many (who often are poor and needy to begin with) is no way to build the kind of ideal society we envision as "the American Dream." There are some things money cannot buy, many things it can corrupt.

③ It is undemocratic for a matter of this scope and importance to be decided by a few individuals. It should be decided in a referendum by the vote of the people. Barring that, it is important that the voice of the people be clearly heard. Thank-you for



Pennsylvania Gaming Control Board



WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Lori S. Biesecker

Address: _____

Telephone: _____

Organization, if any: _____

Employer: Borough of Biglerville

COMMENTS: (Please use second page if more space is required)

There are several reasons why I am opposed to allowing gambling to be introduced in Adams County, but I will address only one: I am amazed to find that any thoughtful person believes it will enhance the quality of life of our citizens. I have lived in places which allowed gambling; it is depressing (to say the least) to be surrounded daily by what inevitably follows: increased crime, families stressed to the brink by the gambling excesses of a member, not to mention the "little" things: the pawn shops, astrology establishments, bookies, etc. that "spring up like weeds around gambling centers. Let me be honest - gambling appeals to the baser side of people, so shouldn't be surprised when casinos are accompanied by the "ornaments" I've mentioned. Will our lives be better, eas



Pennsylvania
Gaming Control Board



WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Barry & Priscilla Reecher

Address: 

Telephone: 

Organization, if any: N/A

Employer: Self-Employed

COMMENTS: (Please use second page if more space is required)

WE OPPOSE THE IDEA OF HAVING A CASINO BUILT IN THE ADAMS COUNTY AREA ESPECIALLY NEAR THE BATTLEFIELD IN WHICH THE GETTYSBURG AREA IS WELL KNOWN FOR. THIS WOULD DO US SUCH A DISERVICE TO THE COMMUNITY, NOT TO MENTION THE HISTORY THAT HAS MOLDED OUR FREEDOM TO WHAT IT IS TODAY. WE SHOULD HONOR THOSE BATTLES OF THE CIVIL WAR AND REMEMBER THEM AND KEEP THIS AREA DEVOTED TO SUCH A TURNING POINT IN HISTORY.

Also the casino would not only

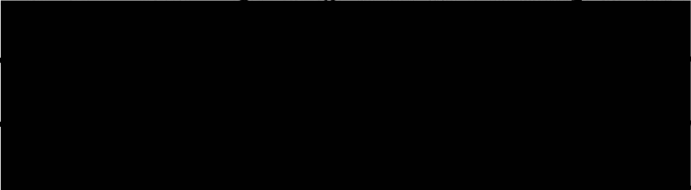
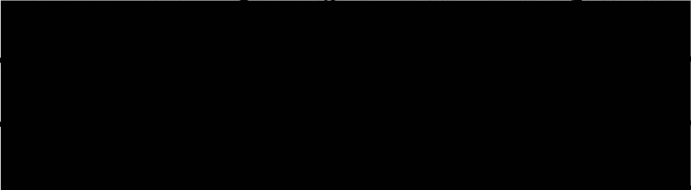


**Pennsylvania
Gaming Control Board**



**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Stanley J. Caskey
Address: 
Telephone: 
Organization, if any: _____
Employer: _____

COMMENTS: (Please use second page if more space is required)

*A casino is not acceptable in our area
or any other as it is the work of the devil. No
good will come to anyone by this means. It
can only contribute to more crime in our
area — Don't allow it please!*

I, _____ verify that the information contained in this written
comment is true and correct to the best of my knowledge and belief.



Pennsylvania Gaming Control Board



WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Lisa S. Gray

Address: 

Telephone: 

Organization, if any: _____

Employer: _____

COMMENTS: (Please use second page if more space is required)

*Acasino does not compliment any community
and will certainly not compliment Gettysburg*

I, _____ verify that the information contained in this written
comment is true and correct to the best of my knowledge and belief



**Pennsylvania
Gaming Control Board**



**WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS**

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Michelle Kosek

Address: _____

Telephone: _____

Organization, if any: _____

Employer: Schindler Elevator

COMMENTS: (Please use second page if more space is required)

Thank you for the opportunity to express my thoughts about granting a license for a casino in Gettysburg, PA to applicant Chance Enterprises, Inc. t/d/b/a Crossroads Gaming Resort & Spa.

I strongly oppose the granting of this license on several grounds. I have read the Local Impact Report, and viewed the Traffic Impact Study, (incidentally, which was submitted much later than your rules required).

Gettysburg holds a specific, special place in history. It is the site of one of the bloodiest battles of the Civil War, the site of a National Cemetery, specifically designated as a place of honor for the war dead, known and unknown, of the Civil War and of subsequent wars. It is the site of the Gettysburg Address, some of the most stirring words ever uttered by a beloved President, Abraham Lincoln. The battle forever changed this town. Many people have used the battlefield for personal profit. Others have sought to

preserve the battlefield, so those that come here to learn and understand can more clearly experience that time in July that occurred nearly 143 years ago.

Gettysburg and a casino are not an appropriate mix. It is jarring on a purely personal, gut level, and on economic, logistic and social levels as well.

Economically, Gettysburg is an illogical and unrealistic site for a casino. Adams County does not have a problem with unemployment, having a relatively low rate in comparison with other counties in Pennsylvania. A casino would bring more entry-level jobs into the area, thus saturating the area with more jobs than people. The majority of the jobs proposed by Chance Enterprises, are not skilled labor jobs, and are not jobs that people would be able to earn a living wage performing. Most of these jobs would be part-time, low-wage positions. The upper-level management positions and other specialized jobs unique to a Casino would not be filled by locals, but by people currently living outside of the area. The hotel associated with the casino would also not provide jobs that do not exist already in the area, in fact, with recent hotel construction; it is possible we are reaching a saturation point with regards to hotel space (too much available, rather than not enough!). Only at certain times of the year are the local hotels full up, and only for one night or two at the most. Traditionally, hotels here have their peak season from May to September. With the casino being located so close to Gateway Gettysburg, it is unlikely that those who have not made a reservation at the casino hotel will go any farther than the Gateway Gettysburg complex. I do not see casinos bringing in any additional visitors to the Park – in fact, the investor's LIR is contradictory – on page 2 – they state “to create a unique, upscale recreational destination in Adams County that...respects, preserves and promotes the region's history and culture..” but several lines further they state “...there will be no emphasis on the history of the region or the Civil War...” This second statement refers to the “theme” that the casino will undertake. One cannot simultaneously promote the history of the area and not emphasize it at the same time.

In addition, I see the casino as a drain on smaller businesses in the area. With a glut of jobs of the same type (service jobs), the ability of smaller businesses to pay the slightly higher wage the casino could afford would drive other businesses away because of inability to compete in paying wages. This will drive the wages lower for the area. The casino can then drop its wages lower with successive hires.

As far as stimulating the local economy, the casino will more than likely detract from it. Many people who come here, do not stay for long periods, but come for the weekend or at least, for a few hours. Traffic concerns would scare many people away. There are some that would not come to Gettysburg specifically because of the casino, traffic or no. The local economy will not benefit from filling the needs of a casino. The majority of the major purchases that a casino requires – gaming equipment, supplies, and service, are not local products. It is unlikely that local businesses will supply the remainder of the casino's needs.

The casino is not a good fit for this area because of concerns about local impact.

Firstly, the casino is right next to the site of Straban Township's Youth Recreation Park, which currently consists of two baseball fields, with one currently under construction. This fact has not been disclosed on the area plans, nor has it been addressed in the LIR. Traffic concerns, plus concerns of the nature of the facility in general, would preclude building any facility of this size and type near the ball fields. In addition, Gettysburg High School is located approximately 1 mile from this site as well. Gettysburg College, while in town, is also an area of concern. I know the College Faculty has voted as one body against the building of a casino. Most parents do not send their child to school to one day run a casino, nor to work in one as a busboy or cocktail waitress. Casinos state that they are against underage gambling – however, determining the age of bettors is difficult at best. Studies have shown that the risk of becoming a compulsive gambler is four times greater among underage gamblers than for adults.

In addition to the impact on the youth of our community – I fear for the impact a facility this size would have on our local municipal services. We currently do not have a dedicated, paid firefighting staff in Adams County. They are all volunteers, and their services are already stretched. Straban Township does not have a paid police presence, and relies upon the state police to handle matters. There is no reason to think that putting a casino in the area will not strain these services even more.

Our roads in general are not sufficient to handle the traffic. There has been traffic studies done, however, these studies were done in November, which is not a high tourist traffic time of year. Where this casino is proposed to be built is a major intersection, with no alternate diversionary roads to take up the slack. Locals will not be able to easily divert their route eastward to avoid this intersection. The Traffic study has estimated that at peak hours, as many as 1200 cars per hour will go through this intersection. In plain terms, that's 20 cars per minute, or one car every three seconds. As I believe this traffic study is flawed in that it did not look at peak summer travel, but used an off-season time (and only *one* day in the week and *one* on the weekend). I believe the traffic will be much worse than expected. There are major routes west of town that cannot handle this traffic. We do not have the luxury of widening roads in town, as there are no easements for the roads in town. Heritage tourists will not continue to come here if they experience gridlock. We do not have a shuttle system, the park is too large to restrict traffic to shuttle buses. Furthermore, a development of a shuttle service would discourage the casual tourist who is just passing through and wants to take a glimpse of the park. They will just drive right on through.

The applicant states, "The applicant's research into potential social effects of the proposed resort indicates that there is a lack of a causal link between negative social impacts and the gambling industry". The claim is that there are no significant social costs that outweigh economic benefits – in short; the claim is that there is a neutral benefit, or a positive one. The claim also implies that because there are possible economic benefits, that these benefits make up for any social ills they create. I believe that this entire statement is hogwash. Casinos make money the most money on people

who bet large amounts. When rewarded with a positive experience (an occasional win), the bettors will bet the money that is won and plow it right back into the casino. When plied with free drinks and other comps, a losing experience would be glossed over. Chance enterprises has used the Gambling industry studies to back its claims, which is similar to the Tobacco industry tactics during their history. It is in the best interest of the Gambling industry to put a positive spin on the activity because that is where they make their money. No industry that has the potential to make billions will shoot itself in the foot by exposing negative outcomes.

Finally, it has been clearly demonstrate by the response at the three hearings, the majority of those people testifying at those meetings were against the casino being placed in Gettysburg. There are other, more advantageous venues for this casino, such as the Poconos. * We do not want it here. * Our visitors do not want it here. There has been a nationwide response that it is not wanted here. There is much to be lost here, a quality of life that cannot be restored once destroyed. Do not make Gettysburg into Atlantic City or Las Vegas or Reno.

Please!

Michelle Kosik



Gettysburg
COLLEGE

Department of Theatre Arts

June 2, 2006

Office of the Clerk
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, Pennsylvania 17106

Dear Pennsylvania Gaming Control Board,

It has been over a year, now, since David M. LeVan announced what he, in his own words, called "an interesting surprise for the people of Gettysburg."

Please understand, I am not opposed to our Pennsylvania lottery, nor to balanced, non-deceptive, legal charitable gambling, *per se*, in moderation. Nor am I able to support a gambling proposal reflecting evidentiary proof of madness, regardless of who's backing it.

However, we must assume that what we have already seen and heard in opposition to the Crossroads-Millennium Gettysburg casino scheme is *nothing* compared to what may be universally expected were the Commonwealth of Pennsylvania and its Gaming Control Board to grant a license for a Gettysburg casino.

With profound, sincere concern and sympathy for you and for our Commonwealth,



George M. Muschamp
Professor, Gettysburg College
[University of Minnesota, M.A., Ph.D., 1974
Gettysburg College, B.A., 1966
Université de Caen (Normandy, France), CIV Diplôme, 1962
Chestnut Hill Academy, Philadelphia; entered 1947; graduated 1962]

enclosure (1) : transcript of G. M. Muschamp's April 5, 2006, actual remarks

TRANSCRIPT of ACTUAL REMARKS of GEORGE M. MUSCHAMP
before the PENNSYLVANIA GAMING CONTROL BOARD
Wednesday, April 5th, 2006; College Union Building Ballroom
Gettysburg College, Gettysburg, Pennsylvania

I am George Muschamp, Gettysburg resident and college professor.

If our Commonwealth expects the secular sacred shrine of Gettysburg to continue to be one of its major revenue producers as a tourist destination, it appears the Commonwealth would want to do all it can to keep the shrine sacred.

The establishment of secular pseudo religions like slots parlors and slots palaces, 'tastefully' vending false hope and reel-mapping hi-tech supercomputer deception in the guise of a fantasy reality at Gettysburg will not help; not short-term, not long-term.

No amount of slick scholarly brilliance and clever rhetoric by the proposed Gettysburg casino's promoters, computer fraud geniuses, high paid publicists, spindoctors and hypemeisters, attorneys and lobbyists can long distract us from the exhilarating, the liberating simple, common sense realization that the unique, the UNIQUE economic value of Gettysburg will be maintained and enhanced as a healthy, flowing cash source and as a long-term cultural investment by keeping casino gambling out of Adams County.

We are confident you will NOT risk placing anywhere near a chopping block the neck of the economic goose that continues to deposit in our state Treasury an exponentially growing mountain of solid gold eggs *from* Adams County's already burgeoning economy—without Crossroads Gaming Resort and Spa.

We have faith in your intelligence and vision not to permit the Gettysburg and Adams County economic Renaissance already upon us to be further injured and subverted by the desperate, selfish folly of attempting to gild the lilies of this Renaissance with a gambling mega-development.

Board Members, thanks for your patience. You have a clear-cut and brightly optimistic choice. Here, yet again in *this* place, a brief opening in time to prove to the nation and the world the kind of balanced, steadfastly abiding, *truly*

4/18/06

DEAR SIR,

PLEASE, NO CASINO AT OR NEAR
GETTYSBURG. WHAT WOULD BE NEXT, A
FERRIS WHEEL OR ROLLER COASTER OVER THE
USS ARIZONA?

YOURS,

DONALD K. MANNS

Donald K. Manns

April 17, 2066

To PGCB Members -

We are lifelong residents of Erie, Pa., the home of Col. Strong Vincent, a brigade commander in the Army of the Potomac, who gave his life in defense of Gettysburg.

It is possible you may award a license to operate a gambling casino on the very ground where men like Col. Vincent gave their all. This surely would be a dishonor to their memory.

How could it be imagined that a gambling casino would be placed near a National Military Cemetery and a National Park dedicated to those honored dead?

If this truly be a "government of the people, for the people, by the people," then let the people's voice be heard above all else - No Casino in Gettysburg.

Mr. & Mrs. Michael E. Starbar
15941 D.

DRAFT REGULATIONS COMMENT FORM

Please complete all of the fields below before printing:

DATE April 13, 2016 ADDRESS [REDACTED]
SECTION # OR SUBJECT Casino - Straban Twp. ADDRESS [REDACTED]
FIRST NAME Orville CITY [REDACTED]
LAST NAME Nyblade STATE [REDACTED]
ORGANIZATION NAME Individual ZIP CODE [REDACTED]
EMAIL ADDRESS [REDACTED] COUNTY Adams - Straban Twp.
TELEPHONE [REDACTED]

COMMENTS


Some of the reasons I am opposed to the proposed casino in Straban Township are:

- A large casino near a small town like Gettysburg would have a negative impact on the pleasant small town-rural ambience.
- The additional revenues to local jurisdictions is unlikely to enable the necessary upgrades to an already inadequate physical and social infrastructure, hence an additional local tax burden.
- Gambling addiction is an admitted increasing social problem. With both a large high school and colleges in close proximity to the proposed casino, additional problems will be brought to the institutions.
- I do not believe that the long-term economic benefits will be positive.

Orville W. Nyblade Ph.D.

Comments may be submitted to the Board by U.S. Mail at the following address:

Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060
Attn: Public Comment



April 13, 2006

Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg Pa. 17106-9060

Dear Board Members,

I wish to express opposition to the placement of a gambling casino in the Gettysburg area. The city of Gettysburg and the adjacent National Park represent significant elements of this nation's efforts and sacrifices to secure personal freedom for all Americans. The siting of a gambling enterprise in proximity to the Gettysburg National Park would diminish both its national significance and it's message of freedom, to all who visit there.

The image of the Gettysburg battle as the turning point of the American Civil War and the message it conveys regarding personal freedom for all persons should not be diminished or otherwise compromised. A nearby casino would do just that.

Please take action to preserve what so many have struggled to protect for future generations by keeping legalized gambling away from Gettysburg.

Sincerely,



Richard C. Prior

DRAFT REGULATIONS COMMENT FORM

Please complete all of the fields below before printing:

DATE 4-12-86 ADDRESS [REDACTED]
SECTION # OR SUBJECT Slots near Gettysburg, PA. ADDRESS [REDACTED]
FIRST NAME Grace CITY [REDACTED]
LAST NAME Coulson STATE [REDACTED]
ORGANIZATION NAME Self & the Lutheran Village ZIP CODE [REDACTED]
EMAIL ADDRESS _____ COUNTY Adams
TELEPHONE [REDACTED]

COMMENTS

Please do not give permission
to put a slots parlor so close to our
Retirement Village!

Comments may be submitted to the Board by U.S. Mail at the following address:

Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060
Attn: Public Comment

As a regular tourist to the Gettysburg area, I'm strongly apposed to the Crossroads Gambling Resort in Adams County. Visitors from across the nation have voiced their opposition to the proposed casino, as have Adams County residents. I do not oppose gambling of any sort, but it has no place there. Gettysburg and its surrounding area have an ambience and historical significance that would be ruined forever if this sort of trivializing commercialism is allowed there. The voices of the residents of Gettysburg, the state of Pennsylvania, and the nation must be heard. Adams county does not need a for Casino success or recognition. It has already earned that, and thrives on it. It's hard to believe that Gettysburg should even be a proposed site for a Casino. Please listen to our pleas, and appose the casino. Thank you.

Eric Champigny

Bondsville, MA

Buizingen , Belgium , May 16th ,

To the PA Gaming Control Board,

On my return from a recent holiday in the United States, I read an article in "USA Today " which mentioned the planned building of a large gambling casino in the State of Pennsylvania , very near to the Gettysburg National Battlefield Park.

You may wonder why a Belgian citizen ever became a Civil War buff and even got engaged in the Civil War Preservation Trust.

Anyhow , I am deeply affected by this project and that is the main reason of this letter.

The three days at Gettysburg were decisive in turning the tide of our glorious Nation's greatest crisis ever.

President Abraham Lincoln made one of the Nation's greatest speeches after the battle.

It meant the birth of the new United States of America where the rights of every citizen without any discrimination were respected.

The building of a large gambling casino so close to one of America's most hallowed grounds , is a huge mistake and should never be allowed.

It is disrespectful to the memory of tens of thousands of men in both Blue and Gray who gave the greatest sacrifice possible to the defense of the ideals for which they fought against each other , in many cases from brother to brother.

It would give the worst of all meanings to the principle of patriotism which we still today, as parents and concerned citizens , want to teach to our children. We ought to teach the children well , as goes the popular song by Crosby, Stills and Nash , for they are the nation's future. If Gettysburg would become Pennsylvania's biggest gambling resort , the association with it would tarnish the great historic significance it has; even today and even for non-US citizens as myself.

It is of paramount importance that the Gettysburg National Battlefield area stays as it is today because otherwise ideals of patriotism , heroic courage and resolute selfsacrifice would get lost for future generations to come. People from outside the United States would certainly decide not to return to Gettysburg if ever a casino should be build. The great respect we pay the Allied soldiers who gave their lives in defending our little Belgium's freedom in both the First and Second World War , may speak for the huge importance we give as citizens of a small nation to these historic events. And so we feel the same in defending Gettysburg!

Being involved in American and European historic associations , I felt it as my greatest duty to react on this matter and to bring it to the attention of its Presidents and its members, who most certainly will participate in what will hopefully not be turned in a desperate Pickett's charge against this casino project , which in my personal humble opinion will also never benefit the economy of the local people involved.

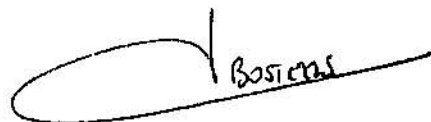
I hope that You will attentfully reflect on this project which involves American's greatest heritage.

I would like this written statement to be included as part of the official PGCB testimony

Respectfully,

Dr Jan Bosteels, MD

Civil War Preservation Trust



Fellow of the International Napoleonic Society

Member of the Société Belge pour Etudes Napoléoniennes

Member of « Les Amis de Ligny »

Member of The Napoleonic Alliance

June 1, 2006

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-9060

Re: Chance Enterprises Category 2 Casino License Application for Adams County, Pennsylvania

Dear Mr. Decker:

The Local Impact Report (LIR) submitted by Chance Enterprises ("Applicant") as part of its application for a Class 2 casino license shares as much or more in common with a fairy tale as it does a legitimate economic or local impact analysis. As summarized below, the objective official data and other reputable, independent studies show that the LIR's major conclusions are without merit.

As documented in my testimony (The Impact of a Large Casino on the Gettysburg Area, and Adams County, Pennsylvania - A Realistic Assessment - attached), the LIR hides the serious and substantial negative consequences this Application poses for Adams County, the Gettysburg area and the Commonwealth. It would be difficult to find a community in Pennsylvania that is more susceptible to the negative impacts of a large casino and has the least to gain from it. Gettysburg and Adams County are a pre-eminent gateway that contribute substantially to the Commonwealth's lucrative tourism industry. Without a casino, Adams County can look forward to continued robust job growth across all sectors of its economy (non-agricultural), higher real wages, increasing personal income, and low unemployment.

The LIR's bizarre assumption that 31 percent of its casino visitors will stay overnight in Adams County illustrates how the LIR mis-represents the prospects of the proposed casino. This assumption is several times more than other reputable casino-industry studies indicate to be realistic. It causes the number of such visitors to be exaggerated by several hundred-thousand and cannot be reconciled with a subsequent Statement made by the Applicant's economic consultant. This and other problems with the LIR raises serious questions pertaining to the reliability of the Applicant's market study, its business and financial analyses, that would negatively affect its gross terminal revenue, its net yield to the Commonwealth, and its ability to meet other goals and objectives of the enabling Legislation.

Much of the LIR relies on Vicksburg (Warren County), Mississippi's its experience with its four casinos that opened in 1993 and 1994. On several key points, summarized below, not only do the official data fail to support the LIR's conclusions, they show the opposite.

For example, through 2003, Warren County's casinos have failed to generate any net new non-

manufacturing wage jobs elsewhere in the County. Chance's LIR forecasts its casino would generate 2,130 such jobs. Official employment data from the U.S. Bureau of Economic Analysis (BEA) and the Mississippi Gaming Commission (MGC) show that Vicksburg's casinos shifted (to the casinos) and destroyed several hundred or more existing jobs, and are the prime culprit for the County's stagnant to declining non-manufacturing job base since 1994. Moreover, Warren County's post-casino real (inflation-adjusted) wages have also stagnated since then.

Relatedly, the official data show year over year visitation to the Vicksburg Battlefield to have plunged after four casinos opened nearby, and that it has struggled since to re-attain its pre-casino level. Strangely, the LIR contends that Vicksburg's casinos increased visitation to the nearby Battlefield. Overall crime rates soared in Warren (Vicksburg) and Harrison (Gulfport and Biloxi, Mississippi) after their casinos opened, and a significantly higher rate of bankruptcy filings has been statistically correlated with the presence of their casinos. Based solely on anecdotal evidence, the LIR maintains that neither of these events occurred, or that Vicksburg's casinos played no part in them.

Jobs

The LIR projects that the proposed casino's "multiplier" effect will generate two full-time equivalent jobs elsewhere in Adams County for each such job at the proposed casino. No such thing has occurred in Warren County, Mississippi -- the casino host-county that, as the LIR correctly notes, is the best case study in the U.S. for evaluating the likely impact of a casino just outside Gettysburg. Since the last of its four casinos opened in 1994, official BEA and MGC data indicate that Vicksburg's casinos likely destroyed such jobs. Warren County has posted a net loss in non-manufacturing wage jobs since its four casinos opened. Previous to their opening, Warren County had enjoyed a modest rate of job growth.

This occurred because Vicksburg's casinos have diverted substantial income and spending by residents and Battlefield visitors from existing businesses. The level of this diversion has been so great that for the last decade it has not only cancelled out any positive job "multiplier" effect the casinos may have had and foreclosed the ability of the local economy to add net new non-manufacturing wage jobs, it evidently destroyed hundreds of such existing jobs.

Relatedly, BEA data also show that real wages paid in Warren County have essentially stagnated since 1994, rising less than one-half percent annually after adjusting for inflation. During the same period real wages increased by about 12 percent in Adams County.

Retail Sales

Further evidence of the negative impact of Vicksburg's casinos on Warren County comes in the form of a study by researchers at the University of Southern Mississippi (Hermann, et.al., "*Gaming in the*

Mississippi Economy, A Marketing Tourism and Economic Perspective”). This 2000 study, obtained after submission of my written testimony to the PGCB, noted that below-average post-casino retail spending in Warren County (Vicksburg), Mississippi was likely attributable to “cannibalization” (diversion) of local spending from general retail business to its casinos. Consistent with the BEA and MGC data, this study actually shows post-casino retail sales to have declined in Warren County. Subsequent communications with this study’s author indicate that it likely understates the level of diversion and decline due to its not having accounted for a change in the reporting of economic data (SIC to NAICS) between 1995 and 2000.

Battlefield Visitation

The negative post-casino impacts on Warren County are signaled in the National Park Service’s visitor data for the Vicksburg Battlefield, which - after Gettysburg - is among the most heavily visited national battlefields in the U.S. In the years before casinos opened nearby, visitation to the Battlefield had been growing steadily after recovering from the imposition of Park visitor fees. In the first calendar year after two casinos opened (and during which two more opened during the peak visitor season), its visitation plunged by 21 percent from the prior year.

This level of decline is comparable to that caused by three other pre-casino economic “shocks”: in 1981 as a result of the doubling in the real price of oil over the preceding two years, in 1985 as a result of the closing of the World’s Fair in New Orleans that attracted about 7 million people, many of whom passed through Vicksburg and visited the Battlefield, and in 1988 after the Battlefield imposed substantial visitor fees at the Battlefield (admission had been free prior to then). Notably, it took, at most, two years for Battlefield visitation to recover after these shocks, after which it continued on an upward trajectory. It took Battlefield visitation four years to recover from the shock of Vicksburg’s casinos, and it has yet to resume an upward trajectory.

Only Hurricane Katrina - which destroyed or disrupted much of the Lower Mississippi Valley in 2005 - has had a greater impact on visitation to the Vicksburg Battlefield than did the opening of Vicksburg’s casinos and these three other major economic shocks. Despite the LIR’s contention that Vicksburg’s casinos increased visitation at the nearby Battlefield, the actual data show the opposite to have occurred.

Bankruptcy

The LIR fails to mention the most exhaustive statistical analysis of personal bankruptcy rates in casino host-counties and adjacent counties - including Mississippi’s - that documents the relationship between casinos and significantly higher rates of personal bankruptcy filings. This study’s results are confirmed by data from Mississippi’s two District Bankruptcy courts that show much higher rates of post-casino personal and business bankruptcy filings. These data are consistent with the jobs data. At the county-level, the presence of casinos is positively correlated with higher rates of personal

bankruptcy filings, and the rate of post-casino filings by businesses in Mississippi also was also greater.

Crime

The LIR declaims any impact by Vicksburg's casinos on soaring post-casino local crime rates in Warren County. But the official crime statistics for Warren County, as well as Harrison County (Gulfport and Biloxi, home to several casinos), Mississippi show their overall crime rates increased dramatically in the years following the opening of their casinos. The LIR offers only the anecdotal belief of anonymous "police officers" as the basis for dismissing any relationship between Warren County's post-casino crime rates and Vicksburg's casinos.

Overnight Hotel Visits


Much of the LIR's supposed economic impact is attributable to its exaggerated assumption of the number of new overnight casino visitors. The LIR assumes that about 31 percent of all visitors to the casino, all of whom would be unique new overnight visitors to Adams County. But this level of overnight stays is equaled or exceeded only by Atlantic City and Las Vegas. And in Tunica, Mississippi, with the third highest level of overnight casino visitors in the U.S., only about 15 percent stay overnight. Reputable studies produced by or on behalf of the casino industry - among them some submitted by other Applicants to the PGCB - show that only about 5 - 8 percent of the proposed casinos visitors are likely to stay overnight. This level of visitation is confirmed by a count of hotel rooms in Jefferson County (Charles Town), West Virginia, home of Penn National's casino that attracts about the same number of visitors Chance estimates from much of the same market area.

Since my testimony to the PGCB in early April, some have made the claim that Vicksburg's casinos are responsible for the presence of County's automotive manufacturing enterprises.

This argument is specious. No study has ever documented any significant relationship between the presence of casinos and automotive manufacturing. This argument confuses coincidence with causality. In reality, Vicksburg's automotive manufacturing suppliers have been attracted because of its proximity to nearby assembly plants in Jackson and Canton, its ready access to rail service and interstate highways, the presence of the only interstate highway bridge crossing of the Mississippi River between Baton Rouge (LA) and Memphis (TN), Vicksburg's Port with access up and down the Mississippi and to the Gulf of Mexico, and the presence in the region of a skilled manufacturing labor force.

Attached is the Final version of my official testimony to the PGCB. It contains some minor edits, the full Addenda, and corrects some typographical and transpositional errors. Please accept it and this letter as my official testimony to the PGCB on this matter.

Regards,


Michael Siegel

attachment: The Impact of a Large Casino on the Gettysburg Area, and Adams County, Pennsylvania, A Realistic Assessment

The Impact of a Large Casino on the Gettysburg Area, and Adams County, Pennsylvania

A Realistic Assessment

Submitted to the Pennsylvania Gaming Control Board as Exhibit A
with respect to:

An Application for a Category 2 Casino License for the Proposed
Crossroads Gaming Resort at Gettysburg, Pennsylvania.

For Scheduled Hearing in
Harrisburg, Pennsylvania,

April 7, 2006

Prepared on behalf of:
the Civil War Preservation Trust

Submitted on behalf of:
the Civil War Preservation Trust, and
Businesses Against the Casino in Adams County

by:
Michael Siegel,
Public and Environmental Finance Associates,
June 1, 2006.

Original Version, March 29, 2006.

Washington, DC

**The Impact of a Large Casino on the Gettysburg Area,
and Adams County, Pennsylvania**

A Realistic Assessment

Table of Contents

Omission of Key Data -iv-

Preface -iv-

Foreword Page -1-

Introduction Page -3-

Impact of a Gettysburg Casino on Adams County and the Commonwealth Page -7-

 Overview Page -7-

 "New" non-Adams County visitors and overnight visitors Page -9-

 The Borough of Gettysburg and its Battlefield Page -11-

 Location, and Competitive Factors Page -12-

Appendix A, Visitation at Vicksburg and Gettysburg National Military Parks Page -14-

Appendix B, Crime Rates and Bankruptcies in Mississippi Page -15-

 Crime rates in Warren (Vicksburg) and Harrison (Gulfport-Biloxi) Counties .. Page -15-

 Bankruptcy filings Page -18-

Appendix C, Overnight Visitors Page -21-

Appendix D, The Diversion Effect Page -23-

Appendix E, Location Factors Page -26-

Appendix F, Employment in Warren County, MS, and Adams County, PA Page -29-

 Warren County, Mississippi Page -29-

 Warren (MS) and Adams (PA), a study of contrasts Page -31-

About the Author Page -35-

Addendum, Page 8 - Public Assistance Page -36-

Addendum, Page 1 - Prior Year Visitation "Shocks," Vicksburg Battlefield Page -38-
Addendum, "New" Visitors, and "New" Overnight Visitors Reconciliation Page -39-

List of Figures

Figure A-1, Visitation at Vicksburg and Gettysburg National Military Parks, 1990 - 2005 Page -14-

Figure B-1, Overall Crime rate, Warren County, Mississippi and U.S., 1990 - 1999. . . Page -17-

Figure B-2, Overall Crime rate, Harrison County, Mississippi and U.S., 1990 - 1999. . Page -17-

Figure B-3, Bankruptcy Filings, Southern District of Mississippi and the U.S. Page -20-

Figure C-1, Visitors to Charles Town, West Virginia Casino, 2004, State of Origin . . . Page -21-

Figure E-1, Casino Market Area Map Page -27-

Figure E-2, Drive Time to Gettysburg, Charles Town, and Delaware Park Page -28-

Figure F-1, Warren County (Vicksburg), Mississippi Employment, 1993 - 2000 Page -33-

Figure F-2, Adams County (Gettysburg), Pennsylvania Employment, 1993 - 2000 Page -34-

Figure, Addendum-1, "New" and Overnight Visitors Reconciliation Page -39-

All reports, studies, Statements, documents and on-line data sources cited in this Report and transmission letter are incorporated by reference.

Omission of Key Data

Other Applicants have included in their LIR's detailed descriptions of their key market study data, assumptions, results, and methodologies necessary to independently validate their results. This Applicant has not. The limited information from and about the market study that is known is insufficient to validate either the LIR's economic analysis, or the market study itself.

A "Right to Know Request" for the Applicant's market study was submitted to the Pennsylvania Gaming Control Board (PGCB) to obtain key data and information ("key data") that was omitted from the Applicant's LIR. This request was denied. This Report's effort to reproduce some of the key data indicates that some are unreliable, some are not reproducible from information currently available, and/or invalid. Specifically of concern are the figures applied in the LIR for the number of "new" non-Adams County overnight visitors, and the total number of "new" non-Adams County casino patrons. The lack of this key data and documentation as to how it was obtained, and in some cases how it was specifically applied to the LIR's economic analysis, is of serious concern. Should some of this key data become available during the course of Public Input Hearings, or through other means, the Author reserves the right to respond.

Preface

This Report finds the Local Impact Report (LIR) submitted in support of an Application for a casino to be located just outside of the Borough of Gettysburg, in Straban Township, Adams County, Pennsylvania does not provide a reliable or realistic assessment of its local impact.

This Report also finds that the Gettysburg area is susceptible to potential negative impacts of a large casino, and; that Adams County's robust economy, its relative prosperity, high rate of job growth, low unemployment rate, and the historic Borough of Gettysburg's relationship with the Battlefield would cause it to be among those that would gain the least from its potential positive impacts.

The Applicant's LIR proposes that its casino would have much the same effect on Adams County, the Borough of Gettysburg, the Gettysburg Battlefield, and the surrounding areas, as Vicksburg's four casinos did on its host County (Warren), the City of Vicksburg, and the Vicksburg Battlefield. As this Report indicates, Warren County's experience is not auspicious.

The Pennsylvania Legislature approved casino legislation in 2004. Nothing in this Report should be construed to represent that it (or the Author), oppose the legalization of gambling, favor or oppose any specific site or Application, reflects the local impact of any other proposed casino, or that it reflects the aggregate impact of any or all other casinos on the Commonwealth.

**The Impact of a Large Casino on the Gettysburg Area, and
Adams County, Pennsylvania**

A Realistic Assessment

June 1, 2006
Updated Version

Foreword

Gettysburg is one of the nation's most pre-eminent historic sites. It is also one of the Commonwealth's most important tourist gateways. Adams County's relative affluence, and the economic vitality of the historic Borough of Gettysburg and the surrounding area, owe much to the presence of the Gettysburg Battlefield, its 1.7 million visitors, and their local expenditures.

The fact that visitation to the Vicksburg Battlefield fell substantially after four casinos opened nearby, and, that 13 years later, the Battlefield continues to struggle to re-attain its pre-casino level of visitation, should be of great concern. For example, in 2004, visitation at the Vicksburg Battlefield was 5 percent lower than 1993 when casinos were first introduced, while Gettysburg's visitation was 21 percent greater than in 1993. Yet, the LIR is of the opinion that Vicksburg's casinos expanded visitation at its Battlefield (see Addendum).

The Applicant's economic analysis, prepared by Dr. Stephen Fuller (Fuller), projects the proposed casino to create thousands of net new off-site jobs in Adams County. But Warren County's (Vicksburg, MS) experience tells a far different story. Not only did its four casinos fail to generate a net gain in off-site jobs, they are the prime culprit for the absence of any expansion in the County's post-casino non-manufacturing-related wage employment.

Fuller dismisses any concern over diversion or redistribution of resident and existing visitor spending to the casino based on the odd proposition that, because his model excludes such spending then no existing businesses will be adversely affected when these individuals take their money elsewhere.

Laboring under the false propositions that, a) all of the proposed casino's economic impact will be additive, and; b) any internal redistribution or diversion of spending from an existing business to the casino is of no import whatever, the LIR projects the proposed casino's 923 full time equivalent

(FTE) on-site jobs will generate a net gain of 2,129 off-site FTE's in Adams County.¹ In Warren County (Vicksburg), Mississippi, the number of post-casino non-manufacturing jobs has actually declined.

This lack of reality pervades the LIR. As documented herein, it does not fulfill the Pennsylvania Gaming Control Board's (PGCB) application requirements. Substantively, many of its basic assumptions and conclusions are unreliable, unsupportable, misleading, or not capable of validation. The Applicant's failure to include key data and information from and about its market study suggests it may also be of some concern.

The proposed casino's location about a mile or so from the historic Borough of Gettysburg's corporate boundary will not moderate its potential to create adverse impacts on the Borough. The Borough and the surrounding area will be as impacted as any of Pennsylvania's prospective host casino jurisdictions.

Indeed, it would be difficult to find an area in Pennsylvania that is more potentially vulnerable to the adverse effect of a large casino. The Gettysburg area lacks a denser urban fabric that would provide it some measure of insulation from, or dilution of, the proposed casino's adverse impacts. The Gettysburg area's economy is too large to escape the proposed casino's adverse impacts, but not nearly large enough for them to be of relatively little consequence.

Without a casino there is little doubt that the Gettysburg area and Adams County will continue to thrive. Adams County will continue along its road as one of the Commonwealth's most prosperous counties, with a high rate job growth, and substantially higher inflation-adjusted average wages. Or, it could follow Warren County's experience of stagnant or declining job growth, and minimal growth in inflation-adjusted average wages in the years following the opening of its four casinos.

¹A recent Statement by Fuller has since allowed that "some" spending by existing visitors could "possibly be diverted from other local activities", but quickly adds that "research does not support this conclusion." If so, this unspecified research would seem to also be unaware of Warren County's post-casino job performance or a study by researchers at the University of Southern Mississippi that documents precisely this effect.

Introduction

This report addresses key issues related to the Local Impact Report (LIR) submitted to the Pennsylvania Gaming Control Board (PGCB) in support of a Category 2 (3,000 - 5,000 slot) casino license for a casino to be located just outside Gettysburg, Pennsylvania.

Some of the key data on which the LIR relies is not capable of being validated. The LIR is erroneous, unreliable, and misleading on several critical issues. For example, it contends that "in the years following the introduction of gambling within Vicksburg, the number of visitors to the Vicksburg Battlefield has increased 11 out of the 12 years".²

After a visitor fee was introduced in 1987, visitation at Vicksburg Battlefield increased an average of five percent annually through 1992 (from 747,270 in 1988 to 910,493 in 1992).³

On a calendar year basis, visitation to the Vicksburg Battlefield fell 21 percent in the first full year following the introduction of casinos in Vicksburg (and during which two more opened). The Battlefield has struggled since to recover its pre-casino level of visitation. For example, in 2004, visitation at the Vicksburg Battlefield was 5 percent lower than 1993, when casinos were first introduced, while Gettysburg's visitation was 21 percent greater than in 1993 (see Addendum).

On a 12-month (August - July) basis, visitation to the Vicksburg Battlefield was down 8 percent in the first 12 months after Vicksburg's first casino opened in mid-August, 1993, and its post-casino visitation has been **lower** than the preceding 12 month period in 8 of 12 such periods from 1994 - 2005 (see Appendix A).

However one chooses to measure it, Vicksburg's casinos have not expanded visitation to the nearby Battlefield. The level of its post-casino decline in visitation, its persistence, and its marked contrast with the experience of the Gettysburg Battlefield over the same period, vividly illustrate the proposed casino's potential to cause substantial and persistent adverse impacts in the Gettysburg area.

People's wallets usually accompany them. Together with the historic Borough of Gettysburg's beneficial relationship with Gettysburg National Military Park, this causes the LIR's treatment of the casino's potential to divert or redistribute existing visitor and resident spending to be of utmost concern.

²Ernico, "Memorandum, RE: Social Impact of Gambling", December 20, 2005, p. 8, Local Impact Report, Chance Enterprises, PGCB Exhibit I.

³For visitor data at Gettysburg and Vicksburg National Military Parks, see: <http://www2.nature.nps.gov/stats/>, and <http://www.nps.gov/vick/visctr/sitebltn/visstats.htm>. For Mississippi casino opening dates, see: <http://www.mgc.state.ms.us/>, "History of Licensure For Operating Casinos", Mississippi Gaming Commission, updated 1/24/2006.

Relatedly, key information from the Applicant's market study has been withheld. The market study may not have applied a gravity model or considered location and other competitive factors relative to other casinos in its market area that would cause its visitation to be substantially lower than the 3.2 million "new" non-Adams County residents it projects. And, half or more of the 1.022 million "new" overnight visitors claimed by the LIR cannot be reasonably accounted for or reconciled with reputable industry studies and the experience of Charles Town's casino.

Regarding the two critical and related issues of Battlefield visitation and the proposed casino's economic impact on Adams County, Fuller more recently declared

"it is difficult to fathom the suggestion that somehow the presence of the casino will 'cannibalize or divert expenditures of existing visitors.' All evidence from casino operations confirms that the presence of the casino expanded spending and visitation in the surrounding region. This has been the experience at the Vicksburg (MS) battlefield. [This] suggestion totally lacks a factual basis and fails to meet the test of credibility."⁴

In the same missive he admonishes another individual that

"good researchers check their facts and strive to find corroborating sources."

One need only glance at the National Park Service's web site to corroborate that the presence of Vicksburg's casinos did not expand its Battlefield visitation as Fuller insists (See Appendix A).

Fuller dodges the diversion issue by changing the subject to "expanded spending". The diversion issue is not a matter of whether spending expanded. Rather, it is whether some local spending and jobs were diverted/redistributed to the casino, and relatedly, whether Vicksburg's casinos generated a sizable increase in net, new, off-site employment and economic activity - as the LIR's economic analysis projects will be the case in Adams County.

Unfortunately, Warren County's (Vicksburg) experience is not encouraging. As this Report documents, Vicksburg's casinos have not generated any significant net gain in off-site employment in Warren County.⁵ A likely explanation for this is that, at the aggregate County level, the negative diversion effect of Vicksburg's casinos cancelled out most or all of their positive multiplier effect.

⁴Fuller, S., *"Response to Statements and Writings by Keith Miller et al. Regarding the Local Impact of a Casino on Adams County"*, March 10, 2006, p. 5. Emphasis added.

⁵In fact, the only reason Warren County's post-casino wage and salary employment grew at all between 1994 and 2000 was because of its manufacturing sector (primarily automotive). Without this sector's contribution, and its economic multiplier effect, total post-casino employment in Warren County would have declined significantly between 1994 and 2000.

This is supported by Dr. Morais' observation in the LIR⁶ that

"the direct impacts of casino visitation are typically absorbed by the gambling industry, because casino visitors do not tend to spread their expenditures with establishments outside the casinos."

Vicksburg's casinos are consistent with this observation. So much so, that Warren County's post-casino non-manufacturing-related wage and salary employment declined from 1994 to 2000 (see Appendix F). This would have greatly limited economic expansion in the surrounding area. Others have previously observed that the Applicant's economic consultant discounted these type of negative economic impacts (see Appendix D).

This Report roughly estimates that the proposed casino would divert/redistribute about \$62.4 million of current resident and visitor expenditures, or about 8.2 percent of all retail, food and accommodation sales in Adams County.⁷ The amount diverted is about 38 percent of the exaggerated direct outlays Chance's LIR claims its casino would generate, and about two-thirds of its realistically estimated direct outlays. This helps to explain why Warren County's post-casino non-manufacturing wage and salary employment declined.

Moreover, whatever post-casino expansion in spending that may have occurred in Warren County was sufficient to have increased Warren County's average real wage by just 4 percent over seven years (1993, when its first casinos opened, to 2000). By way of comparison, the average inflation-adjusted wage in Adams County, Pennsylvania increased by 12 percent.⁸

The implications of this for Adams County are threefold:

- In the aggregate, the net economic impact of the proposed casino on Adams County will be about equal to, and possibly somewhat less than, its on-site economic activity.
- Much of this on-site economic activity will have been diverted from existing businesses.
- The proposed casino will likely have a dampening effect on the average wage paid in Adams County and/or on the County's future rate of growth.

Another concern with the LIR's economic analysis is that it (or the market study on which it relies) may not have applied a gravity model or a sensitivity analysis that would account for the proposed

⁶LIR, Morais, p. 6, citing Teske and Spur (1991).

⁷Based on 2002 Economic Census for Adams County adjusted to 2005 dollars. Gettysburg share based on its reported number of Adams County's retail and food and accommodation establishments (26.5 and 20.1 percent, respectively).

⁸Bureau of Economic Analysis, Tables CA-25 and CA-05. CPI-U from BLS.

casino's inferior location relative to its closest competitors. The drive time to Gettysburg is significantly greater from the major concentrations of population within the Maryland - Washington area market area than it is to three other large casinos that also share this market area (see Appendix E). And, it will be at a serious competitive disadvantage relative to the two that will be owned by Penn National, a large, well-established, Pennsylvania-based publicly traded company with a \$2.6 billion market value.

The LIR's assessment of post-casino social impacts in Vicksburg fails to note that post-casino crime rates soared in Mississippi's Warren and Harrison Counties (Gulfport, Biloxi) at a rate that far exceeded that of the State (see Appendix B). The LIR dismisses any relationship between these crime rates and the opening of several casinos based on the anecdotal belief of anonymous individuals.⁹ It also does not cite the comprehensive, multi-variate, multi-state statistical analysis of county-level bankruptcy filings that included Mississippi's casino-impacted counties (Baren, Staten, Wilshusen, 2000). This study found a significant and positive correlation between casinos and personal bankruptcy filings.

These are just some of the issues related to the validity and reliability of the Applicant's LIR. The LIR's deficiencies are highly consequential for the Gettysburg area given the Borough's small size, the area's beneficial relationship with Gettysburg National Military Park, and the Park's status as one of the most recognized, most significant, and most visited historic sites in the U.S.

⁹The LIR offers no analytical, empirical or statistical analysis specific to either of these host jurisdictions that would explain the rapid increase in their crime rates.

Impact of a Gettysburg Casino on Adams County and the Commonwealth

Overview

The PGCB requires applicants for casino licenses to prepare and submit a Local Impact Report (LIR) as part of their application for a license. The LIR is to include details of

“any adverse impact on transportation... existing tourism, including historical and cultural resources, or other municipal service or resource” (emphasis added).¹⁰

The LIR submitted to PGCB by Chance Enterprises (“Chance”, or “the Applicant”) as part of its application for a Class 2 casino license does not provide a credible assessment of the impact of the proposed casino on Adams County. For example, the LIR:

- Ignores the susceptibility of the area’s businesses to diversion of spending by existing visitors and residents,
- Mis-represents post-casino visitation to the Vicksburg National Military Park,
- Does not adequately assess the impact of the proposed casino on local tourism and historical resources, and the local businesses that are reliant on these resources,
- Greatly exaggerates the economic activity and jobs the proposed casino would generate in Adams County,
- Assumes a level of overnight visitors that is either inconsistent with reputable industry studies and/or double counts overnight stays by existing visitors,
- Does not consider location and competitive factors that will limit the proposed casino’s ability to compete with others in its market area,
- Does not reflect the actual impact of Vicksburg’s casinos on employment in Warren County Mississippi,
- Does not offer any valid explanation for the extraordinarily high rate of increase in post-casino crime rates in Mississippi’s Warren and Harrison Counties,
- Omits key data,
- Does not assess the impact on traffic at numerous intersections on Route 30 east of Route 15 that would be impacted by casino-generated traffic.

An accurate representation of post-casino visitation at VNMP demonstrates the potential for the proposed casino to substantially affect visitor behavior. The exceptionally high increase in local crime rates in the Vicksburg and Gulfport-Biloxi areas that followed the opening of their casinos requires more than the LIR’s credulous acceptance of the anecdotal belief of an unnamed source to conclude the proposed casino will not have any adverse impact on crime rates in Adams County.

¹⁰ _____ “Category 2 Application and Disclosure Information Form”, Pennsylvania Gaming and Control Board, p. 18.

The LIR does not document the Vicksburg Battlefield's pre- and post-casino contribution to Warren County's economy. Nor does it document the Gettysburg Battlefield's contribution to the economy of Adams County.

Indeed, the LIR is virtually devoid of any meaningful local data or context. This is exemplified further by its statement that

"many of those persons to be employed at the Resort would formerly have been on Welfare or receiving unemployment benefits," and, "the influx of good entry-level jobs with benefits is a tremendous benefit to homeless workers and to society."¹¹

The authors of the LIR seem to be unaware that at the end of 2004, only 44 adults in Adams County were receiving 'welfare' benefits under its Temporary Assistance to Needy Families (TANF) program,¹² most of whom were already employed; and, that at the end of 2005, only 11 adults received emergency shelter from the County's Homeless Assistance Program (see Addendum).¹³

In reality, Adams County has one of the lowest unemployment rates in Pennsylvania. Its median household income is reported to be the ninth highest of all Pennsylvania Counties and one of the highest of Pennsylvania's rural counties.¹⁴ Accordingly, many casino-related jobs would be filled by those who live elsewhere, and some others would be filled by persons who would move to the County from elsewhere. For example, a recent study of casino jobs in Mississippi is reported to show that many of its casinos higher paying administrative, managerial and technical jobs were held by non-resident green card holders, even though unemployment rates in Mississippi have typically been significantly higher than Adams County's.^{15, 16}

¹¹ _____, "Local Impact Report", Crossroads Gaming Resort and Spa, p. 13.

¹²Pennsylvania Department of Public Welfare, 12 - 04 E and T Form for Monthly TANF, December 2004. TANF is the Temporary Assistance to Needy Families program, which is the successor to the Aid to Families with Dependent Children (AFDC, commonly referred to as "welfare") program.

¹³Cumulative Quarterly Client Report, Homeless Assistance Program, 2nd Quarter, FY 2005 - 06, 1/11/2006, Adams County, Pennsylvania.

¹⁴See: http://www.publicschoolreview.com/public_schools/stateid/PA.

¹⁵ _____, "Study Shows Foreigners Compete for Top Jobs at Mississippi Casinos", <http://gamblingmagazine.com/articles/14/14-883.htm>, viewed March 24, 2006.

¹⁶The LIR's economic analysis may not have considered that Adams County's low unemployment rate would suggest that a significant number of casino-related jobs would go to non-Adams County residents as a large majority, if not all of casino-related personal earnings are

"New" non-Adams County visitors and overnight visitors

The number of "new" visitors and "new" overnight visitors are two of the most important figures in the LIR. Neither of these can be validated based on information provided. This section attempts to reconstruct these figures using what little insight the LIR provides, and a recent Statement ("Statement") by the author of the LIR's economic analysis.¹⁷ The Statement provides some new data, but also raises some additional concerns pertaining to these two key figures.

Table 2 of the LIR's economic analysis ("Table 2") applies a level of "new" overnight visitors that either double counts existing overnight visitors to the County and/or applies a level of "new" overnight visitors far in excess of that which reputable industry studies support. Or there is another explanation not accounted for by presently known information. Based on what is currently known, there are between about 497,000 - 677,000+ questionable and unaccounted for "new" overnight visitors included in the LIR's economic analysis. And, the 3.2 million "new" visitor figure cannot be fully and reasonably accounted for (see Addendum).

A total figure of 345,300 "new" overnight visitors is within reason. A figure much more than this, and particularly one closer to 525,300 can be obtained only by one or more of the following: double-counting existing overnight visitors to Adams County, the level overnight visitors from the geographic market area that is far beyond that supported by reputable industry studies, or some other currently unknown reason.

The LIR's economic analysis applies a figure of 3.2 million as the number of "new" non-Adams County casino patrons and 1.022 million "new" overnight visitors to the County. Table 2 does include all of 1.022 million overnight visitors' direct spending as part of "hotel/casino" operating costs, or as off-site "overnight visitors."

The Statement says the casino will attract 2.71 million "new" non-Adams County visitors¹⁸, of whom 1.1 million are estimated to be "new overnight guests." The Statement does not reconcile either of these figures with the 3.2 and 1.022 million (respectively) figures applied in Table 2.

shown to for Adams County residents. Non-resident employees will take the bulk of their earnings home with them.

¹⁷Fuller, S., *"Response to Statement and Writings by Keith Miller, et al., Regarding the Local Impact of a Casino on Adams County"*, March 10, 2006, p. 4.

¹⁸The Statement also refers to 2.1 million "newly attracted patrons": "The casino is expected to strengthen the existing visitor market in Adams County as **some portion of the 2.1 million newly attracted patrons to the proposed casino** would be expected to also visit the battlefields and other historic attractions in and around Adams County...", Fuller, Statement, p. 5.

According to the Statement, 20 percent (360,000) of existing visitors to the County represent a "secondary market" to the casino. Adding all of them to the 2.71 million "new" casino patrons equals 3.07 million "new" visitors. However, these are not all "new" visitors. And, even if one were to ignore this, 130,000 of the 3.2 million "new" casino patrons applied in the LIR's economic analysis would remain unaccounted for.¹⁹

Fuller has provided two estimates for the number of "new" overnight visitors: 1.022 (LIR) and 1.1 million (Statement). The 78,000 difference is no small matter. It is equal to 7.6 percent of the figure applied in the LIR, and equals about half of the new overnight visitors who might be reasonably estimated to be drawn from within the casino's geographic market area. But this pales in comparison with the larger problem pertaining to these visitors.

Were, generously, half of the 360,000 casino patrons drawn from existing visitors to the County to be "new" overnight visitors (that is they would not have stayed overnight but for the casino), then this would account for 180,000 "new" overnight visitors.

Perhaps 3 percent (60,300) of the 2.01 million new non-Adams County casino visitors the Statement says would live within a one hour drive might stay overnight. Perhaps 15 percent (105,000) of the 700,000 that are said to live within a 1 - 2 hour drive might also stay overnight. These two groups would account for 165,300 overnight visitors. This figure compares favorably with reputable industry studies, and reasonably well with the level of overnight visitors generated by the Charles Town casino.

Adding the 180,000 "new" overnight visitors drawn from existing visitors to the County equals 345,300 "new" overnight visitors. This is far short of 1.022 or 1.1 million Fuller (variously) estimates.

Even were (unreasonably) all of the proposed casino's "secondary market" visitors to stay overnight, this would account for 525,300 total "new" overnight visitors - still a far cry from the 1.022 million applied in Table 2. The LIR and Statement do not account for who these 525,300 "new" overnight visitors are, or from where they are expected to come.

By way of reference, the number of "new" overnight visitors the LIR applies is 32 percent of its 3.2 million "new" non-Adams County visitors. This is a level of overnight visitation that is equalled or exceeded only by Las Vegas, and Atlantic City, is about twice that of Tunica's, and about 6 times more than Charles Town's casino generates.

¹⁹Fuller should have excluded all of the day-only casino patrons drawn from the County's existing visitors from the economic analysis, but this cannot be verified from the analysis. He should also have excluded most or all of the day-visitor spending of existing visitors who stay overnight, and he should have included no more than about 180,000 of them as "new" overnight visitors.

The implications of these unaccounted for overnight visitors on the LIR's economic analysis are discussed elsewhere in this Report.

The Borough of Gettysburg and its Battlefield

The economy of the Gettysburg area is closely linked to its historic and cultural resources and its rural character. A recent study for the Civil War Protection Trust (CWPT) by an independent research firm found that non-local visitors annually spend \$121 million in and around GNMP.²⁰ These visitors were found to support 2,653 local jobs - not including jobs in the park itself - and to generate \$17 million in local and state tax revenue. These figures do not include their expenditures elsewhere in Pennsylvania.

The historic Borough of Gettysburg and GNMP rely upon and enhance each other's visitation, and the Borough serves as the primary commercial center for visitors and residents alike. A number of other historic buildings and sites are also located within the Borough.

Gettysburg's importance as a heritage tourism site is not confined to Adams County. It is also one of the most important of the Commonwealth's heritage tourism gateways. According to a 1999 study for the Commonwealth, Gettysburg is the single most recognized historic site in the Commonwealth.²¹ Leisure tourism is Pennsylvania's second largest industry, and its heritage tourists tend to be its most economically lucrative leisure visitors.

In contrast to its economic analysis, the LIR's historic assessment (Morais) correctly states that

"the direct impacts of casino visitation are typically absorbed by the gambling industry, because casino visitors do not tend to spread their expenditures with establishments outside the casinos."²²

However, Morais' conclusion that about 15 - 20 percent of casino visitors will also visit GNMP is backward. This confusion likely arises from his mistaken belief that post-casino visitation at VNMP expanded.

²⁰ _____ "Blue Gray and Green, A Battlefield Benefits Guide for Community Leaders", David Peterson and Associates, May 2005. These figures do not include expenditures elsewhere in Pennsylvania. Those who go on to visit Lancaster or Philadelphia may spend more per day due to higher costs in these areas.

²¹Shifflet, "Pennsylvania Heritage Tourism Study", prepared for the Pennsylvania Department of Conservation and Natural Resources, and the Department of Community and Economic Development, May 1999. Collectively, Philadelphia's sites ranked highest.

²²Local Impact Report, Chance Enterprises, Morais, p. 6, citing Teske and Spur (1991).

Collectively, the casino patron survey cited by Morais, the VNMP visitor data, and BEA employment data indicate that a sizable number of VNMP visitors are likely to have bypassed the Battlefield in favor of Vicksburg's casinos where they did virtually all their local spending. Others chose to visit VNMP and/or other local establishments, and Vicksburg's casinos, where they also did most of their spending.

Morias' conclusion that some casino visitors who visit GNMP and other local establishments will be "bringing economic benefits" to Adams County is also backward.²³ Many of these prospective "dual-site" visitors are already coming to the Gettysburg area and are bringing substantial economic benefits to it. As the VNMP visitor data, the Vicksburg casino survey, Mississippi Gaming Commission (MGC) and BEA employment data suggest, the proposed casino will become an efficient mechanism for "redistributing"²⁴ a substantial share of these benefits from existing businesses to the casino.

In the case of Gettysburg, this effect will tend to be accentuated by two factors that are unique to this application - the proposed casino's location is disadvantageous relative to the bulk of its geographic market area, and it will be at a competitive disadvantage in virtually all of its market area relative to Penn National's two casinos at Grantville and Charles Town.

Location, and Competitive Factors

Differences in travel time have a very significant impact on casino visitation.²⁵ A study of Rhode Islander's visitation to the Foxwoods and Mohegan Sun casinos found that small differences in travel time have a substantial effect on which casino they visit. Three times as many Rhode Islander's visit the Foxwoods casino as the nearby and comparable Mohegan Sun casino. This is attributed to the Mohegan Sun casino being 12 to 15 minutes further from Rhode Island than Foxwoods.²⁶

This is crucial for a Gettysburg location. Relative to existing racinos in Charles Town and Delaware Park, Gettysburg's location is disadvantaged from virtually all of the major population centers in the

²³LIR, Morais, p. 9.

²⁴The redistribution effect is also commonly referred to as diversion, transfer, or cannibalization.

²⁵See for example, Cummings, "*Analysis of Current Markets for Casino Gaming in Iowa, with Projections for the Revenues and Impacts of Potential New Facilities, Update*", April 18, 2005.

²⁶_____, "*Market Analysis for a West Warwick Casino*", prepared for the State Senate of Rhode Island, Center for Policy Analysis, University of Massachusetts Dartmouth, May 2004, p. iv.

Maryland - Washington DC market area (see Figure E-1). A Gettysburg casino will be further disadvantaged by being sandwiched between racinos at Grantville (63 minutes drive time from Gettysburg) and Charles Town (70 minutes drive time from Gettysburg). The proposed casino would need to compete against both of these casinos that will be owned by Penn National, a large \$2.6 billion publicly traded company with ready access to the capital markets.²⁷

A Gettysburg location is more disadvantaged than previous studies recognized as they did not account for the existence of about 3,500 quasi-legal slots that are already deployed in the Baltimore area.^{28, 29}

To the extent that Chance's casino does not attract the "new" non-local visitors the LIR expects to be drawn from within a 2-hour drive time it will need to focus its marketing more heavily on existing residents and visitors which will cause its local adverse impacts to be greater still. Excepting these two sources of potential patrons, Penn National is optimally positioned to dominate the rest of the South-central Pennsylvania and the Maryland-Washington markets.³⁰ Delaware Park will further constrain Gettysburg's ability to draw from the Baltimore area.³¹ This will cause the proposed casino to market heavily to nearby residents and visitors to GNMP.

These issues are further documented and discussed in the Appendices that follow.

²⁷Penn National currently operates 14 casinos in the U.S. and Canada, and other off-track betting locations.

²⁸See, http://www.nacsonline.com/NR/exeres/0000711alpifizawytsgoyzgd/NewsPosting.asp?NRMODE=Published&NRORIGINALURL=%2fNACS%2fNews%2fDaily_News_Archives%2fJanuary2006%2fnd0126065%2ehtn&NRNODEGUID=%7b64E36DAB-EA01-4DF5-87B3-FF6421DA5AFF%7d&NRQUERYTERMINATOR=1&cookie%5Ftest=1

²⁹The LIR does not explain how the proposed casino might attract yet additional visitors for an expansion to 5,000 slots.

³⁰By statute, West Virginia's casino licensees retain 46.5 percent of net terminal revenue, while Pennsylvania's will retain about 45 percent. Should both State's administrative expenses be about the same proportionate to total gross terminal revenue, Penn National's Charles Town casino would likely be subject to a marginally lower tax rate. However, any marginal difference in tax rates (+/-) between the two States will be overshadowed by Gettysburg's disadvantaged location and other competitive factors. New legislation may also affect these casinos effective tax rate.

³¹Visitation to a Gettysburg casino would be further constrained should licenses be granted to one or two casinos proposed for Limerick, Somerset, and Nemaquin Resort, as would future legalization of slots in Maryland and/or table games in West Virginia should this occur.

Appendix A, Visitation at Vicksburg and Gettysburg National Military Parks

Figure A-1, Visitation at Vicksburg and Gettysburg National Military Parks, 1990 - 2005

	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Vicksburg													
Visitors, Calendar Yr	.531	.865	.910	1.010	.801	.896	.969	.894	1.005	1.022	.934	.992	1.000
% of prior year		163%	105%	111%	79%	112%	108%	92%	112%	102%	91%	106%	100%
Visitors, Aug - July				.958	.884	.873	.947	.892	.972	1.026	.970	.946	1.000
% of prior period					92%	99%	108%	94%	109%	106%	95%	98%	100%
Gettysburg													
Visitors (millions)	1.244	1.416	1.299	1.411	1.675	1.643	1.633	1.727	1.702	1.642	1.542	1.792	1.800
% of prior year		114%	92%	109%	119%	98%	99%	106%	99%	96%	94%	116%	99%

Source: National Park Service. See: <http://www2.nature.nps.gov/npstats/npstats.cfm>. Visitation in millions. Casinos opened August 9 and November 15, 1993; and, February 27 and July 12, 1994.

Appendix B, Crime Rates and Bankruptcies in Mississippi

The LIR concludes that a Gettysburg casino will have a "lack of negative social effects."³² This conclusion is based largely on the LIR's observations pertaining to Vicksburg, Mississippi. The LIR states that

"Interviews reveal that police officers in Vicksburg do not believe the casinos have caused an increase in crime and social service programs in Vicksburg do not believe that increases in child abuse, suicide or divorce are related to gambling."³³

Notably, the LIR does not include any data for Vicksburg or Warren County to support these beliefs. But this does not stop the LIR from representing them as being conclusive. This approach has absolutely zero validity. This Report make no conclusions on the extent to which Warren and Harrison County's casinos may have contributed to their respective crime rates. The actual crime rate data, however, does indicate that such a contribution cannot be dismissed.

As to bankruptcies, an exhaustive county-level analysis by researchers at Purdue and Georgetown Universities that included Mississippi's casino-impacted counties does conclude that casino proximity is associated with higher rates of bankruptcy filings. This Report provides District Court level bankruptcy filing data for Mississippi that are supportive of these researchers' findings.

Crime rates in Warren (Vicksburg) and Harrison (Gulfport-Biloxi) Counties

The Foundation for the Mid-South compiles crime rates for localities in its region. According to its database, post-casino crime rates exploded in Mississippi's Warren and Harrison (Gulfport, Biloxi) Counties as shown in Figures B-1 and B-2.

These two Figures show that that Warren County's overall crime rate per 10,000 population (inclusive of Vicksburg) increased from about 580 in 1993 - during which two casinos opened in Vicksburg - to about 640 in 1994 - during which two more casinos opened. Warren County's overall crime rate reached a peak in 1995 of about 790. Thereafter, the rate began to decline, and by 1999 the crime rate had fallen back to about 500, though this was substantially above the County's pre-casino rate of about 405 10,000.³⁴

³² _____, Local Impact Report, Crossroads Gaming Resort and Span, Chance Enterprises, December 20, 2005, p. 14.

³³ _____, Local Impact Report, Crossroads Gaming Resort and Span, Chance Enterprises, December 20, 2005, p. 14.

³⁴ Foundation for the Mid South. Data base sources are the National Archive of Criminal Justice Data, FBI Uniform Crime Reports and DOJ Bureau of Justice Statistics. See:

Harrison County's overall crime rate (inclusive of Gulfport and Biloxi) increased from about 395 in 1992 - during which three casinos opened in the County, to about 650 in 1993 - during which another four casinos opened. It's crime rate continued to increase to about 670 in 1994 when two more casinos opened. The following year, the crime rate declined to about 570, after which it shot up to about 840 and 860 in 1996 and 1977 - during which two more casinos opened in the County. By 1999, Harrison's crime rate had settled back somewhat to about 740, which was substantially greater than its pre-casino level.

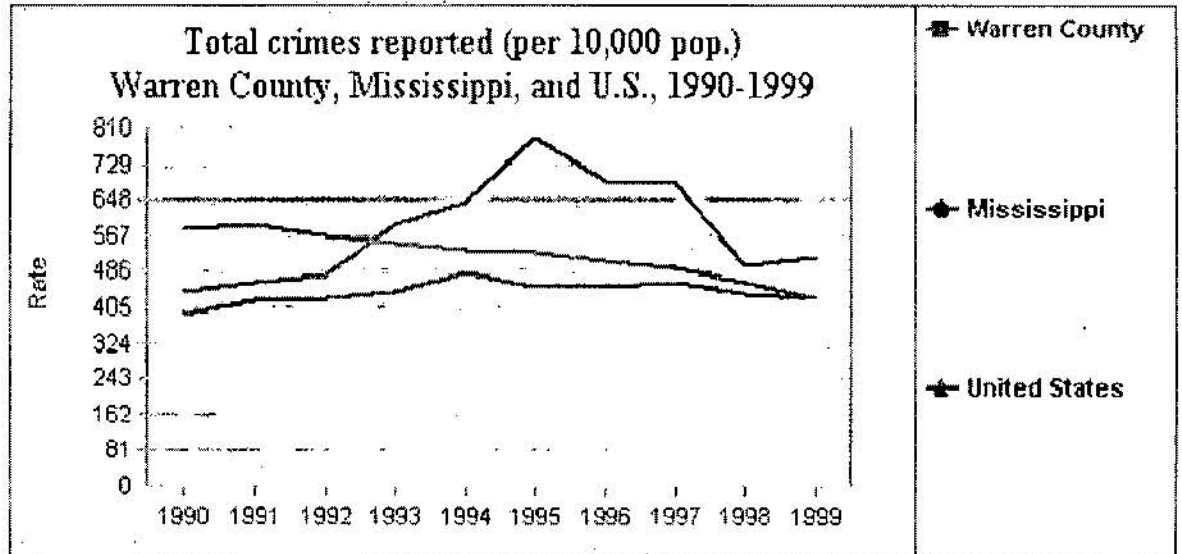
During the same period (1992 - 1999), Mississippi's crime rate increased only moderately. From about 415 in 1992, it rose to a peak of about 486 in 1993. By 1999, Mississippi's crime rate had returned to its 1992 level of about 415. Warren and Harrison's crime rates contrast sharply with that of Mississippi's as a whole.

Over the entire decade (1990 - 1999) during which Warren County's crime rate increased by about 18 percent, Harrison's by about 23 percent, and Mississippi's by about 10 percent, the overall U.S. crime rate declined 27 percent.

The fact that Warren and Harrison's crime rates increased at about double that of Mississippi's, and that all three increased while the national crime rate experienced a substantial decline cannot be ignored. During the decade this occurred, 21 casinos opened throughout Mississippi, of which four were in Vicksburg, and 13 were in Gulfport and Biloxi. It takes more than the anecdotal belief of a couple of anonymous police officers to disassociate any link between these communities' crime rates and their casinos.

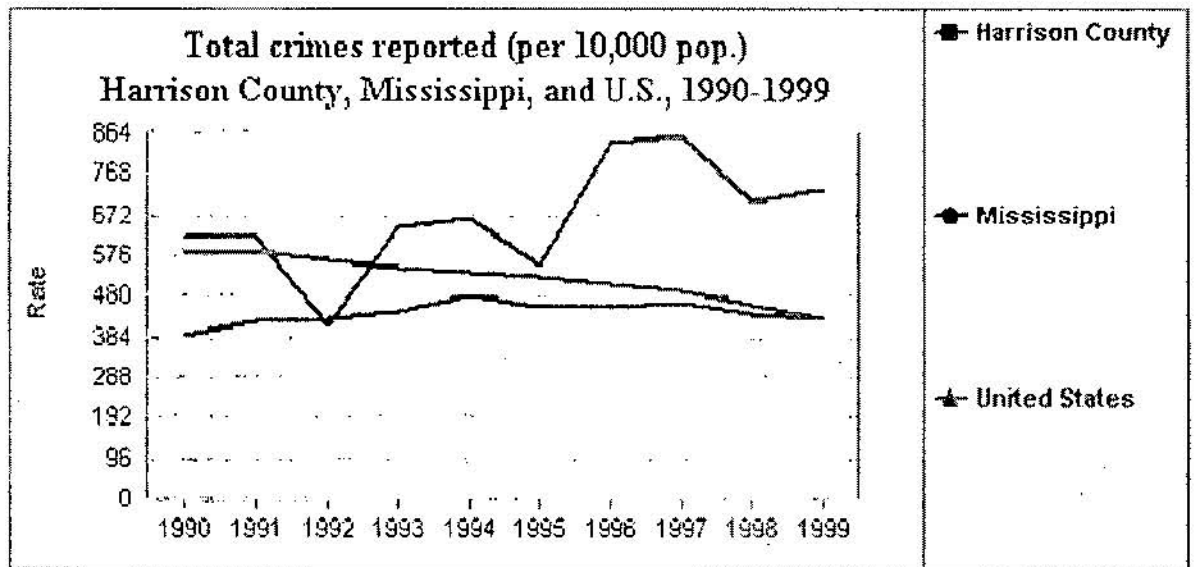
<http://www.fmsindicators.org/ShowOneRegion.asp?IndicatorID=32&FIPS=28149&>. All crime rate figures cited are approximated from Figures B-1 and B-2.

Figure B-1, Overall Crime rate, Warren County, Mississippi and U.S., 1990 - 1999.



Source: Foundation for the Mid South.

Figure B-2, Overall Crime rate, Harrison County, Mississippi and U.S., 1990 - 1999.



Source: Foundation for the Mid South.

Bankruptcy filings

Chance's LIR dismisses any adverse effect of its proposed casino on bankruptcy filings. Because of its small size, the proximity and location of the proposed casino, and its potential to divert a large share of existing visitor and resident spending, the Gettysburg area is particularly vulnerable to experiencing greater levels of bankruptcy filings.

Researchers at Purdue and Georgetown (Barren, et. al) published a multi-county, multi-variate statistical analysis of this issue in 2000. Their study included Mississippi's casino-impacted counties and found that in such counties

"the proximity of casino gambling appears to be associated with higher bankruptcy rates, **but the local impact is far more pronounced** than the influence of casino gambling on national filing rates" (emphasis added).³⁵

Bankruptcy filings for Mississippi at the U.S. District Court (multi-County) level confirm these observations. At this level, post-casino personal and business bankruptcy filings in Mississippi increased more rapidly than did national filings. In Mississippi's Southern District bankruptcy court - which includes Vicksburg, Gulfport and Biloxi - the rate of increase in bankruptcy filings substantially exceeded the national rate beginning in 1995 through 1998.

The pattern observed at the District level in Mississippi would correspond to what one might expect after multiple casinos open in an area that did not previously have ready access to large-scale casino gambling.

The introduction of casinos would tend to be most disruptive to existing businesses in the first few years. After a year or two, affected businesses that are unable to adapt and that try to hang on will begin to close or face bankruptcy. Personal bankruptcies could be expected to follow a similar pattern. Some gamblers may be able to rely on savings, credit cards, or borrowing to sustain their spending and gambling patterns for one or a couple of years, or so. Eventually, these sources tend to dry up. In addition, there can be a lag between when businesses and individuals begin to experience financial difficulties and when they file for bankruptcy.

Both Vicksburg's and Mississippi's Gulf Coast casinos are located in Mississippi's Southern District bankruptcy court. Mississippi's first casinos opened on the Gulf Coast in 1991. Several more followed in the ensuing years. Four casinos opened in Vicksburg in 1993 and 1994.³⁶ In total, 14 casinos opened in the Southern District during 1992 - 1994. Mississippi's Southern District

³⁵Barren, Staten, Wilshusen, "The Impact of Casino Gambling on Personal Bankruptcy Rates", Krannert School of Management, Purdue University, McDonough School of Business, Georgetown University, August 18, 2000.

³⁶Mississippi Gaming Commission.

bankruptcy court filings between 1990 and 2000 are shown in Figure B-3.

As is evident, there was a large spike in the District's bankruptcy filings during the three years beginning in 1995, as there was nationally. However, the rate of increase in Mississippi surpassed the national rate by a large margin. This effect is most pronounced in the 1993 - 1997 period when Mississippi's Southern District bankruptcy filings increased by a factor of 1.9 compared to 1.6 nationally. The effect continues to be noticeable at the District level over the 1993 - 2003 period when the factors were 2.1 and 1.9, respectively.

Figure B-3, Bankruptcy Filings, Southern District of Mississippi and the U.S.

Year	District Filings	U.S. Filings	% Change, District	% Change, U.S.	Casino Openings in District
1990	7,494	782,960			
1991	8,484	943,987	13.2%	20.6%	
1992	8,122	971,517	-4.3%	2.9%	3 ³⁷
1993	6,742	875,202	-17.0%	-9.9%	6
1994	6,539	832,829	-3.0%	-4.8%	5
1995	7,822	926,601	19.6%	11.3%	
1996	10,317	1,178,555	31.9%	27.2%	
1997	12,667	1,404,145	22.8%	19.1%	2
1998	12,474	1,442,549	-1.5%	2.7%	
1999	11,833	1,319,465	-5.1%	-8.5%	1
2000	12,144	1,253,444	2.6%	-5.0%	4
2001	14,275	1,492,129	17.5%	19.0%	
2002	14,228	1,577,651	-0.3%	5.7%	
2003	13,855	1,660,245	-2.6%	5.2%	1
2004	12,757	1,597,462	-7.9%	-3.8%	
Increase as a factor of 1993					
1993 - 97	1.9	1.6			
1993 - 03	2.1	1.9			

Source: <http://www.uscourts.gov/bkrcprvstais/statistics.htm#junc>, Administrative Office of the U.S. Courts, viewed February, 2006.

³⁷Openings in Harrison County during latter half of 1992: August 1st, August 13th and October 19th.

Appendix C, Overnight Visitors

The large majority of the proposed casino's visitors will live within a one or two-hour drive. The overwhelming majority of the visitors from this area will be day visitors - just as with Penn National's Charles Town casino that draws from essentially the same market area.

A reasonable estimate of the likely number of overnight visitors from the geographic market area can be made by examining Jefferson County, West Virginia where Penn National's Charles Town casino is located. As shown in Figure C-1, this casino attracted 3.84 million non-West Virginia visitors in 2004 when it had between about 3,500 - 4,000 slots.

Figure C-1, Visitors to Charles Town, West Virginia Casino, 2004, State of Origin

Origin	Share (%)	Number of Visits
West Virginia	4%	160,000
Pennsylvania	16%	640,000
Maryland	38%	1,520,000
Virginia	31%	1,240,000
Washington, DC	4%	160,000
Other	7%	280,000
Total	100%	4,000,000
Non-West Virginia	96%	3,840,000

Source: Philadelphia Inquirer, July 19, 2004.

Based on a survey of area hotels using the local phone directory and on-line travel service listings, there are currently about 355 hotel and motel rooms in Charles Town, West Virginia.³⁸ Another 480 are located elsewhere in Jefferson County, primarily in Harpers Ferry and Shepherdstown, for a total of 835 rooms in the entire County.

Both Harpers Ferry and Shepherdstown are tourist destinations in their own right. Even if one were to assume (generously, based on the geographic distribution of hotel rooms in the County) that half of all Jefferson County's hotel and motel rooms were attributable to visitors to the Charles Town casino, only about 5.5 percent of its non-County resident casino visitors from its geographic market area stay overnight.

³⁸PEFA, January 2006.

The indicated rate of overnight visitors to Charles Town's casino is consistent with reputable industry studies that show between about 4 - 8 percent of visitors who live within the geographic market area of the casino can be expected to stay overnight.³⁹

Applying the estimated number of casino-related hotels in Jefferson County to the 2.7 million "new", non-Adams County visitors within a 2 hour drive per Fuller's recent Statement, the casino would generate a demand for a total of about 300 or so hotel rooms (on and off-site).⁴⁰ The proposed casino's on-site hotel accounts for 225 of these rooms. The LIR suggests the proposed casino would generate a demand for a total of about 1,800 hotel rooms in all Adams County (inclusive of 225 on-site hotel rooms and based on double occupancy and 70 percent occupancy rate, as assumed in Chance's LIR).

A reasonable upper range estimate of overnight visitors from the geographic market area, plus "new" overnight visitors from among Adams County's existing visitors who would become overnight visitors because of the casino, would be (at most) about 345,000, as discussed elsewhere in this Report. This is about one-third of the figure applied in the LIR's economic analysis. After adjusting the LIR to reflect this level of "new" overnight visitors, the LIR overstates the casino's direct economic impact by approximately \$42 million⁴¹ - before any other adjustment is made for other errors or shortcomings the LIR's economic otherwise contains. This is equal to 25 percent of the LIR's forecast of the casino's total direct outlays.

If these are also non-existent visitors and/or double-counted, they either cannot visit the casino, or some of their local spending has been double-counted. This means the LIR would have also overstated the casino/hotel's direct operating cost outlays. Some of these costs are fixed and would be unaffected by several hundred thousand fewer visitors. Assuming one-third are fixed costs, the LIR would have overstated the hotel/casino's operating costs associated with non-existent or double-counted "new" visitors by approximately 14 percent, or up to about \$8.0 million.

Before any adjustments to reflect its other problems, the LIR overstates the casino's economic impact by at least 25 percent and possibly up to about 39 percent. At the higher figure, the proposed casino's total output would be about \$137 million - not \$224 million. Based on this same level of reduction, it would generate about 1,860 FTE's, not 3,052 before any other adjustments are made for the LIR's economic analysis' other problems.

³⁹See, for example: *Local Impact Report, Tropicana Pennsylvania, LLC*, submitted to PGCB, and also, Innovation Group, *Gaming and Hotel Market Assessment*; Mamakating, New York, August 2004.

⁴⁰Fuller, S., "*Response to Statement and Writings by Keith Miller, et al., Regarding the Local Impact of a Casino on Adams County*", March 10, 2006, p. 4.

⁴¹Assuming they would all stay off-site. If some were on-site, as would be the case, the figure would likely be greater.

Appendix D, The Diversion Effect

The relative impact of the diversion (sometimes referred to as "redistribution", "substitution", "transfer" or "cannibalization") effect on Pennsylvania's casino host communities will be inversely proportional to the size of the local/regional economy. The diversion of about \$60 million in economic activity from existing businesses in, say, Philadelphia would hardly be noticeable on its economy. However, the diversion of this amount from existing businesses in Adams County would be very significant.

The LIR submitted to the PGCB for a Lancaster County casino assumed that 50 percent of the current visitors to that County would also visit its casino.⁴² Fuller's recent Statement has subsequently stated that the proposed casino would attract 20 percent of Adams County's current visitors.

The Borough of Gettysburg had an estimated 2004 population of about 7,800 persons. Its historic downtown business district includes about 100 retail stores, 40 restaurants, 23 hotels and motels, and a number of bed and breakfast establishments.⁴³ The large majority of these establishments are locally owned. These businesses contribute substantially to the County's economy and are the backbone on which the vitality and character of the Gettysburg area relies. Not only is the Borough an important destination for many of GNMP's 1.7 million visitors, it is also the primary governmental and service center for Adams County.

In terms of jobs, the retail sector ranks as Adams County's largest, while the accommodation and food sector ranks third.⁴⁴ These are the two sectors that are likely to be most vulnerable to diversion of resident and visitor spending to the proposed casino. Although the LIR makes no mention of the impact of diversion of resident and visitor expenditures from existing businesses to the proposed casino, it is possible to make a rough estimate of its potential magnitude using data from the 2002 Economic Census, and spending data by Iowa residents who live proximate to its casinos.

In Iowa, which has 17 casinos statewide with 16,614 slot machines and 364 table games⁴⁵, the average

⁴² _____, Impact Statement, materials submitted to PGCB on behalf of applicants for Lancaster County Class 2 casino license, December 21, 2005, p. 2.

⁴³ See, <http://www.mainstreetgettysburg.org/business.html>.

⁴⁴ 2002 Economic Census. Adams County has a 2004 estimated population of 98,322 persons. The 2002 Economic Census reports there were 199 food service and accommodation establishments and 377 retail establishments in the County with total combined sales of \$762.9 million (adjusted to 2005 dollars). The retail sector accounted for 3,521 full and part time jobs, while the food and accommodation sector accounted for 3,193 full and part time jobs.

⁴⁵ See, <http://www.state.ia.us/irgc/>.

resident that lives proximate to a casino spends (loses) a total of \$731 annually. This includes \$650 on slot machines and \$81 on table games⁴⁶, and is equivalent to about \$753 in 2005 dollars. Applying this level of spending to the estimated adult (21 + years) population in Adams County suggests that local Adams County residents will spend (lose) about \$53 million annually at the proposed casino. Assuming half of this amount would have otherwise been spent locally, the casino would divert about \$26.5 million from spending by existing residents at local businesses and enterprises.

Should existing visitors, on average, spend \$20 each at the proposed casino/hotel/spa that would otherwise have been spent locally, the casino would divert another \$36 million from local area businesses, for a total diversion of \$62.4 million annually.⁴⁷

This represents 8.2 percent of all retail, food and accommodation sales in Adams County.⁴⁸ The great bulk of this diversion would occur in the Gettysburg area.⁴⁹ The \$62.4 million figure is about 38 percent of the exaggerated direct outlays Chance's LIR claims, and about two-thirds of its highest reasonably estimated direct outlays. This level of diversion helps to explain why Warren County's post-casino non-manufacturing wage and salary employment failed to grow at all. As that County's punishing experience demonstrates, the diversion effect is real, tangible, and substantial.

The LIR fails to account for a single dollar or a single job being diverted by the proposed casino. This would not be the first time Fuller has ignored the diversion (substitution) effect. One economist (Keating),⁵⁰ in his review of Fuller's July 2000 study for the Virginia Baseball Stadium Authority, found that it and similar studies

"...amount to little more than artful speculation, dressed up with numbers, charts, and equations"

⁴⁶Cummings, W., "*Analysis of Current Markets for Casino Gaming in Iowa, with Projections for the Revenues And Impacts of Potential New Facilities. Update*", for the Iowa Racing and Gaming Commission, April 18, 2005, p. 11.

⁴⁷Most of this would be spent by and for the adults, however some expenses for lodging, food, and sundries would be for any accompanying children.

⁴⁸Based on 2002 Economic Census for Adams County adjusted to 2005 dollars. Gettysburg share based on its reported number of Adams County's retail and food and accommodation establishments (26.5 and 20.1 percent, respectively).

⁴⁹This is a rough approximation to illustrate the magnitude of the LIR's failure to address this issue.

⁵⁰Keating, R., "*Baseline Studies, Stadiums, Subsidies and the Dole*", <http://www.newcolonist.com/stadium.html>. Mr. Keating is the Chief Economist for the Small Business Survival Committee, and co-author of "*U.S. by the Numbers: Figuring What's Left, Right, and Wrong With America State by State*" (Capital Books, 2000).

Dr. Fuller's stadium analysis is criticized on two specific counts:

"The substitution effect is completely or largely ignored", and,

"The negative multiplier is not considered" (emphasis added).

Keating's description and specific criticisms of Fuller's stadium analysis would seem to apply to his analysis of the proposed casino.



Appendix E, Location Factors

As shown in Figure E-1 the market area for a Gettysburg casino is virtually identical to Charles Town's with but a few minor exceptions.

Figure E-2 shows that Gettysburg is disadvantaged by a greater drive time from most of the major population centers within the Maryland-Washington DC area market. Yet the LIR assumes the proposed casino would attract almost as many visitors from substantially the same market area as Penn National's Charles Town casino did in 2004.

As shown in Figure E-2, the one-way drive time to Gettysburg is 7 to 32 minutes **more** from most of the Maryland - Washington DC area market than to either Charles Town or Delaware Park.

Relatively small differences in travel time can have a significant impact on "convenience" casino visits. A market analysis by the Center for Policy Analysis at the University of Massachusetts Dartmouth found that three times as many Rhode Island residents visit the Foxwoods casino in Connecticut than the nearby (and comparable) Mohegan Sun casino. The study attributes this to Mohegan Sun being 12 to 15 minutes further from the Rhode Island market than Foxwoods.⁵¹

These data are consistent with Cummings intensive statistical analyses in Iowa, Mississippi and elsewhere. Cummings work documents that the frequency with which people visit a casino is highly correlated with the inverse of the square of the distance to a casino. That is, people who reside (or work) closer to a casino are likely to visit it exponentially more often than those who reside further away.⁵² It is this strong relationship that forms the basis of gravity models that are often used by regulatory agencies and the casino industry.

⁵¹ _____, "Market Analysis for a West Warwick Casino", prepared for the State Senate of Rhode Island, Center for Policy Analysis, University of Massachusetts Dartmouth, May 2004, p. iv.

⁵²Cummings, "Analysis of Current Markets for Casino Gaming in Iowa, with Projections for the Revenues and Impacts of Potential New Facilities, Update", for the Iowa Racing and Gaming Commission, April 18, 2005.

Figure E-2, Drive Time to Gettysburg, Charles Town, and Delaware Park

From	Gettysburg, PA	Charles Town, WV	Delaware Park, DE	Time Advantage Relative to Gettysburg
Baltimore City, Downtown (MD)	83	82	76	-7
White Marsh, Baltimore County (MD)	88	96	54	-34
Timonium, Baltimore County (MD)	76	85	74	-2
Dundalk, Baltimore County (MD)	91	89	72	-19
Frederick, Frederick County (MD)	43	33	123	-10
Hagerstown, Washington County (MD)	55	48	146	-7
Gaithersburg, Montgomery County (MD)	67	55	122	-12
Rockville, Montgomery County (MD)	72	60	117	-12
Silver Spring, Montgomery County (MD)	85	74	106	-11
Bethesda, Montgomery County (MD)	84	72	113	-12
Columbia, Howard County (MD)	81	69	91	-12
Ellicott City, Howard County (MD)	82	70	90	-12
College Park, Prince George's County (MD)	84	84	106	0
Oxon Hill, Prince George's County (MD)	110	93	121	-17
Washington, DC, downtown (DC)	97	85	120	-12
Arlington County (VA)	100	84	127	-16
Alexandria (VA)	104	90	127	-14
Annandale, Fairfax County (VA)	94	77	128	-17
Tysons Corner, Fairfax County (VA)	87	68	123	-19
Fairfax City (VA)	97	72	132	-25
Springfield, Fairfax County (VA)	100	83	135	-17
Occoquan, Prince William County (VA)	101	89	147	-12
Leesburg, Loudoun County (VA)	70	38	148	-32

Source: Mapquest.com.

Appendix F, Employment in Warren County, MS, and Adams County, PA

Warren County, Mississippi

Direct casino employment will show up in Warren County's service sector employment (which includes food and accommodations employment) as reported by BEA from 1990-2000.⁵³ The service and retail sectors are where the largest positive multiplier effects of a large casino are mostly likely to be found.

Warren County's pre-casino service sector employment grew from 5,833 in 1990 to 6,342 in 1992 or by about 170 jobs annually. At this rate, and in the absence of casinos, there would have been about 6,900 service sector jobs in 1994. Rather, this sector had 10,596 jobs in 1994. The difference of 3,696 jobs is almost all accounted for by the 3,416 on-site jobs reported by the MGC for that year (quarterly average). The balance of 279 jobs is somewhat less than the 340 jobs that would have been generated in the absence of casinos based on this sector's pre-casino growth over the previous three years.

As of 1994, Vicksburg's casinos had yet to generate any net new off-site service sector jobs. As shown in Figure F-1, by 2000, this sector's employment stood at 10,717, which was only 121 more than in 1994. Despite the presence of its four casinos, the County's service sector failed to demonstrate any significant employment growth between 1994 and 2000.

Had Warren County's growth in service sector employment matched that of Mississippi's, this sector would have had almost 2,000 more jobs than it did by the end of the decade. Were it not for a sizable gain in manufacturing sector jobs (and their multiplier effect that would have generated a significant number of new service sector jobs), service sector employment would have likely declined.⁵⁴

By 1994, Vicksburg's casinos may have generated a modest gain in net new retail sector jobs in Warren County - but these jobs soon evaporated. Had Vicksburg's casinos significantly increased net retail spending in the County, the number of post-casino retail jobs should have grown after 1994. This sector added 273 jobs in the pre-casino period between 1990 and 1992 for an average annual growth rate of about 3 percent. By 1994, the number of jobs in this sector had increased to 5,185. This is about 119 more retail sector jobs had this sector's growth to have kept pace with its pre-casino rate between 1990 and 1992. This would suggest that Vicksburg's casinos might have generated about 120 net new retail sector jobs as of 1994. But, the County wasn't able to hold onto these jobs. By 2000,

⁵³U.S. Bureau of Economic Analysis, Regional Accounts Data, Schedule CA-25, Warren County, Mississippi, 1990 - 2000. See, <http://bea.gov/bea/regional/reis/>.

⁵⁴Data for 2000 - 2003 show the total number of service sector jobs continued to stagnate, and total employment to have declined by 641 jobs. Because the post-2000 data are not fully comparable, and the general trend is about the same, this Report concentrates on the post-casino period through 2000.

it had lost 430 retail jobs.

By comparison, the number of jobs in Mississippi's retail sector increased by 16 percent between 1994 and 2000 (or about 2.7 percent on an average annual basis). Had Warren County's retail sector grown at the same rate, it would have had about 6,015 retail jobs by 2000. But it only had 5,033 retail sector jobs in 2000. And, this figure includes retail sector jobs from the multiplier effect of employment gains in the County's manufacturing sector. At the County-level there is no evidence that Vicksburg's casinos generated any net new retail sector jobs.⁵⁵

Employment in Warren County's relatively small wholesale trade sector barely changed between 1994 and 2000. Transportation and public utilities sector employment was also virtually unchanged. Only the Finance, Insurance and Real Estate (FIRE) and construction sectors exhibited any significant employment gains between 1994 and 2000. FIRE sector employment increased by 162 jobs, some of which were attributable to multiplier effects from the County's manufacturing sector. Some may also have been attributable to Vicksburg's casinos.

Construction sector employment increased by 293 jobs between 1992 and 1994, much of which was likely attributable to construction of Vicksburg's four casinos during this time. This sector's employment increased by another 142 jobs by the end of the decade. Since no additional casinos opened in the County after 1994, they would have continued to support a relatively small number of this sector's jobs after then. The sizable increase in the County's manufacturing sector employment would have also have accounted for a number of this sector's post-casino jobs.

The County's self-employed non-farm proprietor sector did increase by a respectable 679 jobs, or 25 percent, between 1994 and 2000. This is the same rate at which this sector's employment increased Statewide, and is also consistent with national trends. This has been a result of technological and structural change in the labor markets (e.g., powerful home computers, fax machines, email, and increased out-sourcing that provides more opportunities for, say, software developers, editors, and public finance consultants). Accordingly, there is little basis to ascribe a large part of this sector's job growth to Vicksburg's casinos. Of course, all of this sector's increase in any self-employed gamblers would be fully attributable to its casinos.

There is no other likely source of private sector employment left to divine the substantial increase in off-site jobs that the LIR's economic analysis claims will occur in Adams County.

These data are compelling. At the County level, Vicksburg's casinos did not generate a discernible net increase in Warren County's post-casino non-manufacturing-related wage and salary employment. Rather, its casinos appear to have limited the growth in such jobs, and may have contributed to their decline.

⁵⁵The casinos local retail sector job multiplier effect may have been negative. More information on regional retail trends and centers is required to confirm this.

These County-level employment data are consistent with what would occur had Warren County's casinos diverted a significant share of visitor and resident spending, income and related jobs. The only reason Warren County's post-casino employment grew at all since 1994 was due to its manufacturing sector. Otherwise its post-casino wage and salary (and likely its total) employment would have declined between 1994 and 2000. These data suggest that Vicksburg's casino's diversion effect on jobs equaled, and may have exceeded, their job multiplier effect.

Warren (MS) and Adams (PA), a study of contrasts

Inclusive of jobs at its four casinos, Warren County's non-manufacturing employment increased by 15 percent between 1993 and 2000. Adams' non-manufacturing employment increased by 25 percent during this time.

Warren County did experience a one-time sizable increase in service sector jobs from on-site jobs at the four casinos that opened in August 1993 - July 1994. Thereafter, and through 2000, the County's non-manufacturing wage and salary employment fell. Its total employment increased modestly because of growth in its manufacturing (primarily automotive) sector. In the post casino period through 2000, Warren County's non-manufacturing employment decreased by about one percent between 1994 and 2000. Adams' increased by 23 percent. Were it not for the multiplier effect of its manufacturing sector, Warren County could have lost several hundred additional jobs.

In the one sector where Warren County did experience a respectable gain in post-casino employment (1994 - 2000), that being among self-employed non-farm proprietors, it was crushed by Adams County. During this period, the number of self-employed proprietors in Warren County increased 25 percent. In Adams County, the number of self-employed proprietors increased by 59 percent.

Would a casino increase Adams County's average wage? Unfortunately, the BEA data also show there is little prospect for this. Though the average inflation-adjusted wage did increase by a modest 4 percent in Warren County between 1993 - 2000, during the same period, Adams County's increased by 12 percent.⁵⁶ The proposed casino will not have any table games, whose workers typically earn more than non-supervisory floor workers. This would further dampen any increase in average wages.

At the end of September, 2004, Vicksburg's casinos had 3,767 slots and 637 table and poker game positions for a total of about 4,439 gaming positions.⁵⁷ They employed a total of 2,188 full and part

⁵⁶Bureau of Economic Analysis, Tables CA-25 and CA-05. CPI-U deflator from BLS.

⁵⁷Quarterly Survey Information, July 1, 2004 - September 30, 2004, MGC. 79 table games, 5 poker games estimated at 8 positions per game. In 1995, Vicksburg's casinos had about 2,850 slots and 168 table games for a total of approximately 4,200 gaming positions. Source: MGC, Quarterly Report.

time persons, which equals .49 jobs per position. The proposed casino, initially, would have 3,000 gaming positions (all slots) and 1,430 full and part time on-site jobs. This is equal to about .47 jobs per position. However, since the proposed casino would have no table games its ratio of jobs per position is likely to be lower than Vicksburg's, as table games tend to be more job intensive than slots.

Figure F-1, Warren County (Vicksburg), Mississippi Employment, 1993 - 2000

CA25 Total full-time and part-time employment by industry - Warren, MS
(number of jobs)

Code	Item	1993	1994	1995	1996	1997	1998	1999	2000
	Employment by place of work								
010	Total full-time and part-time employment:	26,469	30,333	30,812	30,755	30,682	30,782	31,659	31,316
	By type								
020	Wage and salary employment	23,222	27,434	27,769	27,528	27,310	27,337	28,174	27,723
040	Proprietors employment	3,147	2,919	3,043	3,217	3,372	3,445	3,485	3,593
050	Farm proprietors employment	258	247	244	240	233	237	241	242
060	Nonfarm proprietors employment 2/	2,889	2,672	2,799	2,977	3,139	3,208	3,244	3,351
	By industry								
070	Farm employment	335	310	314	313	311	301	305	306
080	Nonfarm employment	26,134	30,023	30,498	30,442	30,371	30,481	31,354	31,010
090	Private employment	20,070	24,013	24,575	24,835	24,930	25,169	26,177	25,573
100	Agricultural services, forestry, fishing and other 3/	165	(D)	(D)	(D)	(D)	(D)	(D)	(D)
200	Mining	59	(D)	(D)	(D)	(D)	(D)	(D)	(D)
300	Construction	1,007	1,141	1,162	1,192	1,277	1,242	1,215	1,283
400	Manufacturing	3,910	4,212	4,406	4,712	4,895	5,010	5,563	5,337
500	Transportation and public utilities	1,012	1,047	1,027	1,056	1,058	1,005	958	1,038
610	Wholesale trade	620	617	680	685	632	615	627	605
620	Retail trade	4,953	5,135	5,358	5,213	5,079	5,069	5,403	5,333
700	Finance, insurance, and real estate	1,052	978	1,038	1,129	1,079	1,123	1,073	1,140
800	Services	7,254	10,596	10,622	10,644	10,666	10,731	11,006	10,717
900	Government and government enterprises	6,064	6,010	5,923	5,557	5,391	5,312	5,177	5,137
910	Federal, civilian	3,103	3,078	2,960	2,677	2,492	2,345	2,183	2,181
920	Military	431	425	396	373	370	365	356	349
930	State and local	2,470	2,507	2,567	2,507	2,529	2,602	2,633	2,607
931	State government	102	99	82	84	86	87	85	80
932	Local government	2,368	2,408	2,485	2,423	2,443	2,515	2,548	2,517

Footnotes for Table CA25 (SIC)

- The estimates of employment for 1969-74 based on 1967 Standard Industrial Classification (SIC). The estimates for 1975-87 are based on the 1977 SIC. The estimates for 1988-2000 are based on the 1987 SIC.
- Excludes limited partners.
- "Other" consists of the number of jobs held by U.S. residents employed by international organizations and foreign embassies and consulates in the United States.
- Cibola, NM was separated from Valencia in June 1981, but in these estimates Valencia includes Cibola through the end of 1981.
- La Paz County, AZ was separated from Yuma County on January 1, 1983. The Yuma, AZ MSA contains the area that became La Paz County, AZ through 1982 and excludes it beginning with 1983.
- Estimates for 1979 forward reflect Alaska Census Areas as defined by the Census Bureau; those for prior years reflect Alaska Census Divisions as defined in the 1970 Decennial Census. Estimates from 1988 forward separate Aleutian Islands Census Area into Aleutian East Borough and Aleutian West Census Area. Estimates for 1991 forward separate Denali Borough from Yukon-Koyukuk Census Area and Lake and Peninsula Borough from Delta Census Area. Estimates for 1993 forward separate Sitka-Yukon-Anchor Census Area into Sitka-Yukon-Anchor Census Area and Takotna Borough.
- Shawano, WI and Monmouth, WI are combined as Shawano (incl. Monmouth), WI for the years prior to 1979.

If this estimate shown here constitutes the major portion of the true estimate:
 (D) Not shown to avoid disclosure of confidential information, but the estimates for this item are included in the totals.
 (L) Less than 10 jobs, but the estimates for this item are included in the totals.
 (N) Data not available for this year.

Regional Economic Information System
 Bureau of Economic Analysis
 Table CA25
 April 2005

Figure F-2, Adams County (Gettysburg), Pennsylvania Employment, 1993 - 2000

CA25 Total full-time and part-time employment by industry -- Adams, PA
(number of jobs)

Code	Item	1993	1994	1995	1996	1997	1998	1999	2000
	Employment by place of work								
010	Total full-time and part-time employment	38,637	39,879	40,374	40,462	40,705	43,773	45,233	45,791
	By type								
020	Wage and salary employment	29,862	30,805	31,128	31,069	30,915	30,696	31,936	33,104
040	Proprietors employment	8,775	9,074	9,246	9,393	9,790	13,077	13,297	13,687
050	Farm proprietors employment	1,275	1,288	1,313	1,302	1,334	1,356	1,325	1,329
060	Nonfarm proprietors employment ^{1/}	7,500	7,786	7,933	8,091	8,456	11,721	11,972	12,358
	By industry								
070	Farm employment	2,120	2,145	2,158	2,123	2,261	2,084	2,152	2,282
080	Nonfarm employment	36,517	37,734	38,216	38,339	38,444	41,689	43,081	44,509
090	Private employment	32,143	33,231	33,657	33,789	33,588	36,984	38,316	39,571
100	Agricultural services, forestry, fishing and other ^{2/}	594	580	618	639	622	637	625	635
200	Mining	72	209	195	188	180	180	173	168
300	Construction	2,726	2,705	2,637	2,635	2,672	3,247	3,506	3,521
400	Manufacturing	8,058	8,552	8,621	8,337	8,133	8,055	8,299	8,528
500	Transportation and public utilities	1,304	1,263	1,277	1,316	1,368	1,297	1,490	1,573
610	Wholesale trade	1,249	1,058	1,080	1,200	1,200	1,419	1,588	1,668
620	Retail trade	6,776	7,036	7,392	7,394	7,306	7,853	7,786	7,912
700	Finance, insurance, and real estate	1,705	1,909	1,756	1,683	1,753	2,230	2,297	2,473
800	Services	9,659	9,925	10,101	10,197	10,454	12,064	12,543	13,075
900	Government and government enterprises	4,374	4,503	4,559	4,550	4,856	4,705	4,765	4,936
910	Federal, civilian	496	459	438	441	455	455	444	464
920	Military	357	340	318	303	295	294	296	290
930	State and local ^{3/}	3,521	3,704	3,803	3,806	4,105	3,956	4,025	4,184
931	State government	210	214	214	211	218	219	219	229
932	Local government	3,311	3,490	3,589	3,595	3,887	3,737	3,807	3,955

Footnote for Table CA25 (SIC)

1. The estimates of employment for 1949-74 based on 1967 Standard Industrial Classification (SIC). The estimates for 1975-87 are based on the 1977 SIC. The estimates for 1988-2000 are based on the 1987 SIC.

2. Excludes limited partners.

3. "Other" consists of the number of jobs held by U.S. residents employed by international organizations and foreign embassies and consulates in the United States.

4. Cibola, NM was separated from Valencia in June 1951, but in these estimates Valencia includes Cibola through the end of 1951.

5. La Paz County, AZ was separated from Yuma County on January 1, 1945. The Yuma, AZ MSA contains the area that became La Paz County, AZ through 1945 and excludes it beginning with 1945.

6. Estimates for 1979 forward reflect Alaska Census Area as defined by the Census Bureau, those for prior years reflect Alaska Census Divisions as defined in the 1970 Decennial Census. Estimates from 1986 forward separate Aleutian Islands Census Area into Aleutians East Borough and Aleutians West Census Area. Estimates for 1991 forward separate Denali Borough from Yukon-Koyukuk Census Area and Lake and Peninsula Borough from Dillingham Census Area. Estimates for 1998 forward separate Skagway-Yukon-Altai Census Area into Skagway-Koonah-Angoon Census Area and Valdez Borough.

7. Sheepshead, WI and Manitowish, WI are combined as Sheepshead (incl. Manitowish), WI for the years prior to 1997.

E The estimate shown here constitutes the major portion of the true estimate.

(D) Not shown to avoid disclosure of confidential information, but the estimates for this item are included in the totals.

(L) Less than 10 jobs, but the estimates for this item are included in the totals.

(N) Data not available for this year.

National Economic Information System

Division of Economic Analysis

Table CA25

April 2002

About the Author

Mr. Siegel has twenty-eight years of experience in the field of public and environmental finance and impact analysis. In the early 1990s, Mr. Siegel formed his own consultancy, Public and Environmental Finance Associates based in Washington, DC. His clients have included a wide range of State and local governments and Federal agencies, landowners, developers, environmental, and citizen groups. Over his career he has been the author, co-author or lead researcher for jurisdiction-level economic and fiscal analyses in over 100 localities throughout the U.S.

Among these projects were: economic and fiscal impact analysis of the the Peacekeeper Missile Project, and the Everett (Washington) U.S. Navy Carrier Vessel Battlegroup deployment, the WorldCom corporate office park, the Disney America theme park and real estate development, a number of multi-thousand acre mixed use projects, a tourism-driven economic and fiscal impact model for the U.S. Virgin Islands, and a development driven economic and fiscal impact model for Loudoun County, Virginia.

Previous positions include regional impact specialist in western Colorado, Director of the Office of Commercial Revitalization for the State of Maryland, and Assistant Director of the Research Center of the Government Finance Officer's Association (GFOA).

As Assistant Director of the Research Center of the GFOA, Mr. Siegel headed the fiscal planning and environmental finance practice. Engagements included numerous state and local governments and the U.S. Environmental Protection Agency.

While heading up the State of Maryland's Office of Commercial Revitalization, Mr. Siegel authored legislation and regulations for the State's targeted revitalization loan program, for which he subsequently prepared underwriting and packaging for projects seeking loan assistance. He provided similar functions for the State administered Community Development Block Grant economic development projects.

In the 1980s, Mr. Siegel prepared economic and fiscal impact analyses of the deployment of the U.S. Air Force's Peacekeeper Missile on local governments in Wyoming and Nebraska. Subsequently, he assisted with preparation of economic and fiscal impact analyses of Homeport Everett for a carrier vessel battle group to be stationed in Washington State.

As a regional impact specialist in Western Colorado, he was responsible for assisting more than a dozen County and municipal governments and school districts with project planning and implementation in anticipation of, and in response to, energy development driven population influxes that saw some localities experience a doubling of their populations in three years.

Addendum, Page 8 - Public Assistance

Page 8: "at the end of 2004, only 44 adults in Adams County were receiving 'welfare' benefits under its Temporary Assistance to Needy Families (TANF) program, most of whom were already employed."

General Assistance (GA) recipients are defined by the Pennsylvania Department of Public Welfare as: "persons who do not meet the requirements for TANF. Most GA recipients are individuals or couples with no dependent children, who have temporary or permanent disabilities that prevent their employment". Accordingly, perhaps only a handful of GA recipients might become casino employees (see: <http://www.dpw.state.pa.us/LowInc/Cash/003670283.htm>).

Food stamps are a form of income support. Under Pennsylvania's eligibility criteria, a large number of casino jobs would qualify some of its employees and/or their households to receive food stamps. And, any individuals who qualify for food stamps that would come to the County for a casino-related job would add to those in the County who receive food stamps and/or other forms of assistance.

Page 8: "at the end of 2005, only 11 adults received emergency shelter from the County's Homeless Assistance Program."

The figure cited is the number of "unduplicated" adults who received emergency shelter assistance. Another 7 such adults received bridge housing assistance during this period. For the entire year, a total of 34 unduplicated adults received shelter under the County-supported Homeless Assistance Program.

As related to this Report, this issue concerns whether a relatively large number of casino jobs would be held by homeless adults with a strong attachment to Adams County. Assuming that, over the course of a year, there are 3 - 4 four times as many such adults in the County (this would include those in other shelters and who do not stay in a shelter), there would be, at most, about 100 additional, or 135 "unduplicated", homeless adults in the County during 2005. Some of this latter group would not have a strong attachment to the County. Assuming half of this group has an attachment to the County, and all of those in County-assisted shelters do, there are, at most, about 90 unduplicated homeless adults in Adams County with an attachment to the County.

Many of these persons, and in particular those in the County's program's (as these offer a variety of other transitional and support services) will find jobs with other County employers, just as they do now. Among those who do not, would be some with drug and alcohol, gambling, and/or emotional problems that would make a casino-related job inappropriate. Others may have law enforcement or other backgrounds that would preclude their employment at the casino. Some would simply choose to move elsewhere. Others may be unemployable for health or other reasons. Accordingly, not much more than a handful of such individuals might reasonably be assumed to be employed at the proposed casino over the course of a year, some of whom may be employed as casual or day labor.

Except, as Warren County's post-casino employment indicates, many of these jobs would have been

transferred from other existing businesses in the County where these individuals could have otherwise been employed.

Likely to be of greater impact to the County is the potential for some indigent and/or homeless persons from elsewhere to be attracted to the County as a result the proposed casino. A number of these individuals are likely to find themselves on the County's public assistance rolls, or in its shelters at some time, even were they to find employment at the casino. Any such individuals would compete for the limited number of casino jobs for which those already in Adams County might be able to attain. Others who the casino would attract to the County, but are unable to find or hold onto a job, would further add to the County's food stamp, public and/or homeless assistance rolls, along with their children and other accompanying family members.

And, the most recent monthly unemployment data for the County by the Bureau of Labor Statistics shows the County's unemployment rate to be about 3.3 percent. This places it among the top tier of counties in the U.S. with the lowest unemployment rate. Accordingly, there are not too many in the County among those who would like to work, can work, are able to do so, and are hireable, including its homeless adults, who do not already have a job.

The LIR does not deal with these issues in any substantive manner.

Addendum, Page 1 - Prior Year Visitation "Shocks," Vicksburg Battlefield

Page 1, after 2nd paragraph, and Page 3, 4th paragraph:

Visitation to Vicksburg's Battlefield had largely recovered by 1998, more than four years after Vicksburg's casinos opened, and continued to remain fairly stable thereafter through 2005. The large decline in 2005, however, was the result of destruction and disruption Hurricane Katrina caused throughout much of the Lower Mississippi Valley. In the aftermath of Hurricane Katrina, visitation to the Vicksburg Battlefield fell by 36 percent from the previous year, as compared to a 21 percent decline after casinos opened nearby.

Going back to the mid-1970's, the Vicksburg Battlefield's year over year visitation fell by more than about 20 percent three times as a result of an unusual "shock" or event: in 1988 after daily visitor fees were introduced (down 22 percent); in 1985, after the World's Fair in New Orleans (down 24 percent) that attracted about 7.3 million people to the Fair in New Orleans, among whom several hundred thousand or so are indicated to have also visited the Vicksburg Battlefield on their way to or from New Orleans; in 1981 after the Iran/Iraq war in late 70's - early 80's that caused oil prices to double (23 percent decline in visitation), reaching the equivalent of about \$84 per barrel (in 2005 \$).

Over the last 25 years, the 21 percent year-over-year decline in visitation to the Vicksburg Battlefield associated with the opening of casinos nearby was only slightly less than the shock effect of a doubling in the world price in oil, the introduction of visitor fees, and the closing of the nearby World's Fair. Only Hurricane Katrina has exhibited a larger effect than these highly disruptive events.

However, the introduction of casinos differs in one key respect. It took four years for the Vicksburg Battlefield's visitation to recover to its pre-casino level. It took two years to recover after the imposition of visitor fees, and only one year to recover from the effect of the oil shock of the early 1980's. It remains to be seen how long it will take its visitation to recovery from Katrina's effect.

Addendum, "New" Visitors, and "New" Overnight Visitors Reconciliation

The LIR's economic analysis is based on 1.022 million "new" overnight visitors staying in Adams County. This is without including hundreds of thousands of existing overnight visitors, or relying on an assumed level of over a 2-hour drive time market area that is several times greater than reputable industry studies indicate, and the level of visitors to the nearby Charles Town casino in Jefferson County, West Virginia.

Figure, Addendum-1, "New" and Overnight Visitors Reconciliation

"New" Visitors (non-Adams County residents)	Existing and Casino Visitors	"New" (Percent)	"New" Overnight, Reasonable (Percent)	"New" Overnight, Highest Possible (Percent)	"New" Overnight, Reasonable (Percent)
Existing visitors	1,800,000	0.0%	10.0%	20.0%	
Casino visitors					
New to County	2,710,000	100.0%	5.5%	8.0%	
Existing, new to casino	360,000				
Total casino visitors	3,070,000				
As applied in LIR (Fuller)	3,200,000				1.0
As per "Statement" (Fuller)					1.0
Unaccounted for "New" Visitors, LIR	(130,000)				(6)
Unaccounted for "New" Overnight Visitors, Statement					(7)

Sources: Local Impact Report, Chance Enterprises, December 2005. "Statement" by S. Fuller, March 2005.



Posted 6/2/06
9:15 PM

WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS
re Crossroads Gaming, Chance, Gettysburg

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: John A. Murphy

Address: [REDACTED]

Phone: [REDACTED]

Telephone: [REDACTED]

Organization, if any: [REDACTED]

Employer: Borough of Gettysburg - Borough Council

COMMENTS: (Please use second page if more space is required)

Attached statements made in public hearing on whether Gettysburg Borough Council would accept an unseen agreement with Chance Enterprises to testify before the PGCB in favor of the casino in exchange for \$1 million.

These statements are by the 3 councilmen who voted NO
to the agreement & resume

John A. Murphy, 3rd Ward Gettysburg Councilman
April 3, 2006

Statement 1

ORIGINAL

I am John A. Murphy, Gettysburg 3rd Ward Borough Councilman and Chairman of the Council's Finance Committee. I am opposed to a casino in Gettysburg. This is a hard thing to say given the Borough's constant search for new revenues and Chance Enterprises purported offer of \$1 +M.

My concerns fall into three categories: Economic impact; Job Impact and Community impact

ECONOMIC IMPACT - There are two major types of revenue available to local government - Regressive taxes and Progressive taxes.

Regressive taxes are such things as Real Estate/Property taxes that are main source for current Borough government operations. They are painful to our property owners and you all know the story of how our borough taxpayers pay 12 to 13 times the real estate taxes of our neighboring townships.

Progressive Taxes are such things as our new Majestic Theater Amusement taxes or the new Occupancy or Pillow tax paid by visitors to Gettysburg as part of their hotel bill.

Progressive taxes are not painful. Some call them "blue bird money". They are willingly paid by the buyer as part of a voluntary purchase. We owe it to our taxpayers to guard against tax increases such as we had to institute this year. At first glance Casino tax revenues or contributions would appear to be a Progressive tax revenue. But, unlike amusement or pillow taxes - casino revenues appear to also have an unknown "down side" to them in terms of increased traffic, crime and potential societal problems such as addiction etc. So - will \$1 or 2M compensate for such future problems? I think not.

JOB IMPACT - Over the last 15 years the Chamber of Commerce has run strategic planning workshops. One of the consistent recommendations of these workshops has been that Gettysburg needs to recruit high tech businesses that would provide our best and brightest jobs and careers right here in South Central Pennsylvania. Not in Washington D.C. or Baltimore. A casino will create thousands of jobs, but they will be mostly service-economy jobs. Usually casinos pay their employees well and provide competitive benefit packages. A prime source for prospective casino employees will be our existing local businesses. Certainly our restaurants and tourist businesses, but it will not stop there. All local businesses can expect to be at risk and that includes Gettysburg Hospital and Gettysburg College and affiliates to include the Majestic Theater.

COMMUNITY IMPACT - Finally, let me conclude by guesstimating what I call the potential Community Impact of a new casino business in Gettysburg. My measure for estimating Community Impact is whether it is additive or complementary to existing businesses? Does it create something new that the community needs such as high tech professional jobs for our youth? Or, does it tie to our strong suit symbolized by our very name - Gettysburg? Our worldwide reputation as a preeminent historic place? To my mind - a casino does poorly in both of these areas. First, it will create low end, service economy jobs (lots of them!) and casinos are insular isolated businesses that will not tie to our existing history businesses. Gateway Gettysburg on the other hand at least intends to tie to our history. Casinos are skillfully engineered and operated to bring

John A. Murphy, 3rd Ward Gettysburg Councilman
April 3, 2006

their clients into a "twilight zone" adult experience that is exciting and pleasure-ful. From the gambling, to the free food, drinks, spas, and reasonably priced lodging - it is a virtual oasis of pleasure that is a short drive from the Megalopolis cities of Baltimore and Washington D.C. .

I think a casino is an inappropriate activity for a world class, historic town. The Borough of Gettysburg has undergone a virtual renaissance during the past 15 to 20 years. Through joint planning and community stakeholder partnerships. From the new NPS Museum and Visitor Center, to Gateway Gettysburg to downtown Gettysburg and its restored Lincoln Train Station, the Wills House, the Historic Pathway and the Majestic Theater. Casinos traditionally are attracted to depressed areas. We are not a depressed area. We are one of Pennsylvania's most vibrant, growing areas. We do not need any dramatic increases in visitation. What we do need is a "qualitative" increase in visitation - family's that will come for multi day visits to Gateway Gettysburg conventions, the NPS Museum and our Borough's historic venues.

That completes my statement Mr. President



JOHN A. MURPHY



Summary - Gettysburg, Pa. Borough Councilman - Chairman Finance Committee; Community Development Committee Vice Chairman; Legislative Committee member ; Historic Architecture Review Board liaison. Former Vice Chairman of Main Street Gettysburg Inc.; President, Pennsylvania Research Associates. Past President (1999-2000) Gettysburg Rotary Club. Retired Navy Commander. Former Principal, Booz•Allen & Hamilton Inc., Washington D.C.

Gettysburg Borough Council - 3rd Ward Councilman (main tourist district). Former 2nd Ward Councilman (Gettysburg College area). Chairman, Finance Committee - Introducing, new multi- year Capital Projects Planning system for management of major new attractions in downtown Gettysburg (e.g. Lincoln Train Station, Wills House & Historic Pathway). Currently developing low interest/no interest loan program for private property improvement in Gettysburg's Historic District.

Main Street Gettysburg Inc. - Vice Chairman 2001-2002. Member of Board of Trustees since 1993. Set up MBO system for monitoring Executive Director and staff performance. Borough Council liaison 2000 -2001.

Other Community Activities - President, Notre Dame Club of Gettysburg; 1st Chairman of Department of the Interior's Federal Advisory Commission to the Gettysburg National Military Park. Chairman, USS Gettysburg (CG-64) Commissioning Committee (1991 in Philadelphia). Adams County Chamber of Commerce - Retail & Industrial Committee; Chairman, "Gettysburg 2020" visionary Task Force; member of Pennsylvania Lincoln Highway Heritage Park Task Force (Adams County). Sole Russian translator and simultaneous interpreter for Adams County Court system.

Pennsylvania Research Associates - Former President and sole proprietor. Specialize in Russian language and marketing services to government and commercial clients. Traveled to Russia (St. Petersburg & Moscow) to provide interpretive support to York and State College, Pa. clients during conferences and business meetings. Former Principal with Booz•Allen & Hamilton Inc. and Executive Director of the Russian Studies Center in Bethesda, Md. Currently providing Russian simultaneous interpretation and translation services to clients in Pennsylvania and California.

Military - Retired Commander, U.S. Navy. Served aboard destroyers and aircraft carriers during a 20 year career in naval intelligence. Two tours in Vietnam (1964 (Phu Quoc) & 1968 (USS Kitty Hawk in the Tonkin Gulf). Operations Officer at a Black Sea warning site (Istanbul). Atlantic Command (CINCLANT)staff officer during peak of the 1962 Cuban Missile Crisis.

Education - B.Sc. in Business from the University of Notre Dame (1955). M.Sc. in Russian Language & Linguistics from Georgetown University (1972). Graduate, U.S. Navy OCS in Newport, R.I (1958). Graduate, U.S. Navy Intensive Russian Program (1959); Taught Russian language at Gettysburg College (1991-1993).

Personal - Born and raised in the Lake country of western New York (Rochester). Married to Joan Mans of Rochester (Nazareth College) since 1958. Have four grown children living in the Washington D.C. and Frederick, Md.

PRESS COPY
MY STAND ON THE CASINO ISSUE
submitted by Dick Peterson

I'm not going to sit here and tell you about all the moral reasons for opposing the Casino project. They've already been echoed hundreds of times from people in the community including newspapers, television, No Casino, etc., etc., etc. I agree with many who have articulated their personal feelings for not having a casino and disagreed with some of their points. And, I have listened with interest to the positions outlined by the pro casino folks . . . but

1. I am a Borough Councilor representing the 3rd Ward and I would like to feel that I am responsibly representing the people from my Ward. My personal opinion is that a Casino would negatively affect many of my neighbors. It's true I haven't talked with everyone from my constituency. As a matter of fact, I haven't received one call . . . not one . . . from someone who supports the casino project. I have not met anyone on the street from my ward who has expressed support for the casino project. I'm sure they're out there, but I have not heard from them. On the other hand, I have spoken with many who oppose the project. The people who I have talked to are concerned about how it may affect their neighborhood. The 3rd Ward has its problems now. I do not think I want to exacerbate that situation. The most frequent question posed by my neighbors was, "When is the Borough going to take a stand, hopefully, against the casino?"

2. We have no indication that we at the Borough are going to be reimbursed for the police, traffic, damage, crime, social problems and corruption that will occur. Why would anyone want that to happen in this great town? It is an insult to my intelligence to say that we will have none of these things develop as a result of a casino. Now, at the twelfth hour, I understand that Chance Enterprises has offered us a yearly grant of \$1,000,000. To that, I say too little, too late. This attempt to buy our votes will not influence my personal position. The downtown is flourishing with better things still on the drawing board. I don't want to see that promising future imperiled. As an aside, I spent a good part of my life in Detroit (1959-1979), and to presume that gambling casinos, as inferred by the Millennium group, saved Detroit from ruination is an absurdity. If they're going to point out businesses that helped Detroit, I think that Ford Field and Comerica Park were the turning points. The reason Detroit did not develop their downtown, prior to Ford and Comerica were based on years of governmental corruption and mismanagement. The casinos did bring large numbers of people into the city and big dollars with it. The State of Michigan won't reveal how much money they earned, in deference to the privacy of the gambling establishments. The casinos also brought with it big time crime and all its ugly ramifications.

3. I have never been to a Casino that didn't want all my money. I am not, by any means, a Casino junky, but I do know that they will be a formidable competitor when it comes to the tourist dollar. And is that illogical . . . wrong? Of course not. That is the way business works. After all, casinos are now a legal business. Everyone in a capitalist society tries to compete for the American dollar. And rightfully so. Especially casinos. They extend to the patron, not just gambling, but offer name entertainment, restaurants, and all the other amenities found at any top notch resort. Do you really think they want people to leave their comfortable setting at the Casino complex and go to the theater, or to an in town restaurant? I don't think so. In other words, the goal is to keep all discretionary money within the Casino. If the Gettysburg Casino sends hoards of people into the community it will be the first time in history where that happens. Millennium has years of experience on how to minimize that from happening.

4. And one more thing. A successful casino almost certainly breeds one amazing ancillary creation . . . more

casinos. Look at Detroit, Vicksburg, Mobile and so on. If . . . and I repeat if, Millenium's casino is everything they say it's cracked up to be, you can be assured that MGM, Harrahs and the rest of the big time gambling establishments will not be far behind. And further, if you think that full time gaming will never happen here you're living in never never land. I simply don't want this area to evolve into a gambling Mecca.

Finally I would like to add that The Civil War visitor and the recreational gambler are very different folks. I do not see much of a crossover among them. But I do think that Civil War visitation may negatively be affected especially among religious families or families with children.

Lastly, as to a casino, my motives as a Councilor are not only economically driven . . . but hopefully, for compassionate reasons, as well. Some of the points I have outlined may have sounded like a casino could be a good idea, but please look at the big picture, economically and consequentially. As a result, I am emphatically opposed to a casino in the area and I will not be bribed into thinking otherwise.

A handwritten signature in black ink, appearing to read "Dick Eaton". The signature is written in a cursive, flowing style with a long, sweeping tail at the end.



Pennsylvania
Gaming Control Board



WRITTEN COMMENT TO BE INCLUDED IN THE
EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: ROBERT S. RESIG

Address: _____

Telephone: _____

Organization, if any: GETTYSBURG BATTLEFIELD PRESERVATION ASSOCIATION - MEMBER
CIVIL WAR PRESERVATION TRUST - MEMBER

Employer: HANOVER HOSPITAL

COMMENTS: (Please use second page if more space is required)

May 30, 2006

Dear Sirs:

- I am against building a casinos at Gettysburg, Pa. for the following reasons:
1. As a Christian I do not approve of or support any type of gambling.
 2. As a resident of York County, Pa. I must have my automobile tested annually for exhaust gas emissions due to our poor air quality. The support three million visitors to a casinos located west of York County would degrade our air quality through increased exhaust gas emissions.
 3. The Hanover Evening Sun had an article this spring

Comments: Page 2 (continued)

4. The resulting urban sprawl that the casinos would need certainly would degrade our quality of life thru:
- a. Increased traffic and noise
 - b. Air pollution
 - c. Crime increase
 - d. Affect our area's water supply.

5. Lastly our own Pennsylvania State Governor has publically spoken against locating a casino near Gettysburg.

I, Robert S. Resig verify that the information contained in this written comment is true and correct to the best of my knowledge and belief.

ROBERT S. RESIG