

246 Norwood Ave.  
Buffalo, NY 14222

April 23, 2001

Michael Krasner, AICP  
County of Erie  
Department of Environment and Planning  
10th Floor, Rath Building  
95 Franklin Street  
Buffalo, NY 14202

Dear Mr. Krasner,

Please include this letter among the public comments on the scoping process for the convention center EIS. I would like to see the following considerations addressed in the study:

### **Market Projections**

Since the Johnson and KPMG studies were done, the market prospects have changed significantly. *Tradeshaw Week*, for instance, is now projecting a 25% increase in the total capacity of U.S. meeting facilities by 2005, and an increase of only 4% in attendance; please incorporate updated data in the projections. (See the attached *New York Times* article for additional context.) In developing projections, please consider also the increased local competition from the new Adam's Mark facilities and the Clarence Convention Center, as well as the competitive disadvantage Buffalo may have in attempting to attract conventions from warmer cities during the winter months.

The accuracy of past projections, both site-specific and overall market size, should also be assessed. The Johnson report, for instance, relied on Center for Exhibition Industry Research projections for overall industry growth during 1996-2000. It's now possible to compare those projections to the actual data for 2000; how accurate were they, and what are the implications for current CEIR projections? Next, how accurate have consultants been in projecting additional visitors to result from recent facility expansions or replacements in other cities? (For instance, I understand Baltimore was told to expect their recent expansion to produce roughly a 50% increase in visitors, and in fact there was essentially no change.) Finally, how accurate were the projections made before construction of the current Buffalo and Niagara Falls Convention Centers?

### **Economic Impact**

In assessing the likely economic impact, do not neglect opportunity costs: what is the value of the *existing* activities that will be displaced from the various sites, as well as the lost potential of alternative approaches to *further development* of those sites? (For instance, the recent R/UDAT study emphasized the critical importance of retaining what remains of Buffalo's unique architectural heritage, and initiating conversion of unused commercial structures to housing. The opportunity lost through demolition of these structures should be considered as a cost.)

A second kind of opportunity cost is the set of alternative investments precluded by devoting a large chunk of public money to this project. To understand properly its economic impact, the payoff should be compared to other ways of investing \$151 million in downtown: what is the cost per job created, and the cost per dollar of wages created, and how does that compare to other forms of public investment (infrastructure; education; assistance to multiple small business)? Also, how does the cost compare to simply purchasing hotel rooms at public expense for visitors who agree to stay several days and buy their own meals, local transportation, and souvenirs?

Please consider also the relative risk of relying on a single large project for economic development vs. a number of independent smaller projects. Also, be sure that the average number of hotel-room-nights

per meeting attendee assumed in calculating the economic impact is borne out by the experience of similar cities.

### **Hotel Capacity**

If the project does produce a significant increase in out-of-town visitors, is there a plan for providing sufficient hotel rooms, given that the existing downtown hotels are already at capacity in the summer, when we would draw the bulk of our convention business? Given the likely low occupancy during the slow winter months, private investment in a new convention hotel is unlikely. Will we then have to, like many other cities, build a publicly funded hotel along with the convention center, and how much will that add to the project's cost?

### **Urban Fabric**

What is the impact on the urban fabric of placing a monolithic, single-use facility of this size within the downtown core? Will it promote or inhibit 24-hour, 7-day pedestrian activity downtown (what is the trip-generation per square foot for similar facilities here and elsewhere, and how evenly is the pedestrian traffic distributed around the clock and throughout the week and year)? How will the proposed project and associated demolition affect the prospects for getting more people living downtown? What will the impact of any street closings or tunnelizations be on pedestrian flow and on the viability of Buffalo's historical street grid? Is there a feasible reuse plan in place for the current convention center if it is to be replaced?

### **Green Design**

Include the energy wastage implicit in any demolition of existing structures.

### **Location**

Given current interest in promoting regionalism, and the difficulty of consistently filling any large facility, should consideration be given to having an upgraded or replaced Niagara Falls convention center serve the entire Buffalo-Niagara region?

If a new convention center is to be constructed within Buffalo, in considering potential sites please remember to distinguish between *easy access* to major hotels (necessary) and *adjacency* to hotels (not necessary). Attached is a table of data compiled by the late transportation planner Gordon J. Thompson in 1999. He found that of convention facilities in approximately 60 cities, more than half are located either on the periphery of downtown or outside downtown altogether. 30% have *no* principal hotel nearby, and many of the others have a single hotel nearby that cannot house most of the visitors. In such cases, public transit links the convention facility to a more distant set of hotels. Mr. Thompson found that rail transit served to link the primary hotels to the convention centers in Baltimore, Boston, Calgary, Denver, Detroit, Edmonton, Jacksonville, Montréal, New Orleans, Philadelphia, Portland, Sacramento, St. Louis, San Diego, San Jose, and Vancouver. Given Buffalo's existing light rail system, any site near the rail system should be considered to offer easy access to centrally located hotels.

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Thank you for the opportunity to provide these comments.

Sincerely,

Hank Bromley