



Mr. Thomas Hersey, Jr.  
Erie County Department of Environment and Planning  
95 Franklin Street, 10<sup>th</sup> Floor  
Buffalo, New York 14202

December 19, 2018

Re: Convention Center Market and Feasibility Analysis

Dear Mr. Hersey,

Thank you for the opportunity to submit comments on the Buffalo Niagara Convention Center Market and Feasibility Analysis completed by HVS on July 6, 2018.

PBN is writing to register our strong opposition to the "Expanded BNCC Site." Expansion at this site would necessitate the demolition of nine buildings, six of which have been determined by the New York State Historic Preservation Office to be eligible for the National Register of Historic Places, and two of which have not had a determination made yet but upon further research may be determined to be Eligible.

As you know, it is the City of Buffalo's historic architecture that in large part is driving our economic expansion and virtually all of the positive national press that our region receives. To turn back the clock to the bad old days of urban renewal where we clear an entire block of businesses and restaurants to put in a single-use, "silver bullet" type project would not only fly in the face of all tenets of good urbanism and sustainable economic revival, but would fly in the face of our lived experience as a City, which shows us the folly of these types of failed projects.

The report submitted by HVS states that the Expanded BNCC Site would cost up to \$343,000,000 for construction only (not including land acquisition, soft costs, infrastructure, etc. which can all be expected to add significantly to the cost of the project) and would have an approximately \$34.5 million annual fiscal impact on the City of Buffalo. Let's contrast this investment with just one of our marquee preservation projects, the Darwin D. Martin House. This project carries an overall price tag of \$50,000,000, and even in its incomplete current state has upwards of 80,000 visitors a year and generates an annual economic impact of \$20,000,000 to the region. This is one project out of many preservation-based projects that are returning out-sized value to our region. The latest Federal figures show that just between 2002 – 2015, nearly a half billion dollars in investments in historic architecture has generated nearly 5,000 jobs (the majority of which are permanent) and nearly \$100 million in tax receipts to various levels of government.

Investment in our history, in our unique urban environment, always pays higher dividends than these types of government-driven urban clearance projects. As you may recall, under

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the Giambra administration, it was proposed that several blocks of historic buildings in the Main/Mohawk section of downtown should be razed to build a new convention center. When urbanists and preservationists protested this potential loss of building fabric, and suggested that building owners should be supported to develop mixed-use residential spaces, proponents of the project scoffed that these buildings would not be re-used. Today, following defeat of that proposal, virtually every one of the buildings that were proposed for demolition are fully occupied and their residential tenants are a huge part of the ongoing revival of downtown Buffalo. In the current study, we are talking about displacing existing established businesses. In addition to the costs associated with that (current law would require the County to pay for relocation costs of these businesses, and would not require that these businesses remain downtown), this represents a zero sum game for these parcels. Rather than bringing additional life to this part of downtown, we are simply trading one set of uses for another set of uses. Our focus as a community should be to infill blocks like this with additive buildings and businesses and thereby increasing overall economic vitality, not in swapping out one business model for another.

Building on Buffalo's strengths, its unique history, its abundance of historic buildings and neighborhoods, its interesting geography and weather, would be the wise investments for our community. Independent data tells us that cultural tourists stay longer in their destinations and spend more money than any other type of visitor. Demolishing the assets that are already proving to be paying high local dividends to invest in an industry which the HVS report calls "highly competitive and price sensitive" and specifically notes industry-wide downward price pressures caused by electronic meeting substitutions and reduced spending by associations is a return to the failed silver bullet economic development programs of our sad urban renewal age.

Thank you for the opportunity to submit these comments. PBN would welcome the opportunity to discuss this project further with you at any time. We appreciate the commitment the County Executive's administration has made to culture and the arts, and would be happy to work with you to see how we can encourage even more preservation-based economic development in Western New York.

Sincerely,

Jessie Fisher  
Executive Director