



THE NEW MILLENNIUM GROUP

of western new york, inc.
p.o. box 512
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September 2005

Mr. Keith M. Bellanger, Chairman
Buffalo Place, Inc.
671 Main Street
Buffalo, NY 14203

Re: Proposed Seneca Nation of Indians Casino in Downtown Buffalo

Dear Mr. Bellanger and Board Members:

I am writing on behalf of New Millennium Group of Western New York ("NMG") to voice our support for your consideration, as recently reported in the *Buffalo News*, to formally oppose the development of a Seneca Nation of Indians gambling casino in Downtown Buffalo, and we strongly encourage you to make such a formal declaration as soon as possible. As we believe you are aware, NMG has staunchly opposed the development of a casino in Downtown Buffalo since it was first proposed, and we are pleased to see that many members of the Board of Directors of Buffalo Place have come to the same conclusion.

NMG's opposition to a casino in Downtown Buffalo is based on many of the same concerns, as reported in the *News*, expressed by members of the Buffalo Place Board of Directors. As is explained in greater detail below, these concerns include:

- ▶ The lack of evidence that casinos (particularly those that rely primarily on local patronage) generate positive spin-off economic development;
- ▶ The fact that ancillary, tax-exempt development associated with a casino is likely to harm existing Downtown businesses; and
- ▶ The likelihood that any Downtown casino, exempt from local land use regulation, is likely to conflict with the planning priorities established by the City's award-winning Queen City Hub Plan.

More specifically, we remain extremely skeptical that a casino in Downtown Buffalo will have a positive economic impact on the community. There is very little (if any) evidence that a casino located in an urban area will generate spin-off economic development, particularly where such a casino is likely to draw predominately from local residents. Frankly, there is little reason to expect that a Downtown Buffalo casino will draw extensively from visitors from outside the region. Given the proliferation of casinos throughout New York State and the nation, it seems unreasonable to assume that out-of-town visitors will choose to come to Buffalo because it, too, has a casino. Nor should we

expect that we will attract a significant number of the approximately 10 million tourists who visit Niagara Falls annually based on the existence of a casino in Downtown Buffalo, given that there are already three large-scale casinos available in the immediate Niagara Falls area. Rather, we believe that the City of Buffalo's redevelopment efforts should seek to complement, not compete with, Niagara County's efforts in attracting increased tourism. Our theatres, museums, architecture, professional sports teams, nightlife, and the eventual well-planned development of our waterfront are well suited for this purpose; a redundant casino is not.

In addition, any proposal by the Nation to include ancillary development, such as one or more hotels, retail and entertainment establishments, all exempt from local land use control and taxation, will unfairly compete with, and thus likely harm, existing, tax-paying businesses Downtown. While the City apparently hopes to dissuade the Nation from such developments, the fact remains that the City has no standing under the Compact to influence these decisions. Given the social and economic stakes involved with such decisions, we believe it would be ill-advised in the extreme to endorse any proposal that would, in essence, authorize the permanent removal of some indeterminate portion of Downtown from local control for potentially open-ended development that may not only fail to complement current and planned developments Downtown, but may also compete directly—and on an unequal footing—with those developments.

We also are very concerned that any proposed Seneca Nation casino located in Downtown Buffalo will conflict with the vision for downtown currently embodied in the City's award-winning Queen City Hub plan. Because the site of any Seneca Nation casino will be exempt from local land use regulation, the City would be essentially powerless to ensure that the casino would be consistent with existing and planned development patterns downtown. Moreover, based on the Seneca Nation's previous Convention Center proposal and their public statements to date, it is apparent that the Nation envisions a "big box", single-floor facility augmented by additional adjacent parking facilities. We believe that any such facility would be fundamentally inconsistent with the vision that so many Western New Yorkers, including many members of this organization, have helped shape for downtown: a vision that respects the urban fabric of Downtown, that emphasizes restoring, wherever possible, the historic radial and grid street pattern of Downtown, protecting its historic building stock, creating a pedestrian-friendly, dense streetscape of mixed uses, and encouraging residential developments. Consistent with this vision (as well as the recommendation of the 2001 R/UDAT Report), this organization has also supported a moratorium on the demolition of existing buildings for the creation of new off-street parking downtown to halt the continued deterioration of Downtown's urban streetscape.

A downtown casino along the lines proposed by the Seneca Nation would conflict with all of these goals. We do not believe there can be any serious dispute that the development of casino gambling is not compatible with the desire to develop a strong residential base downtown.

These are all reasons that your group has also fully considered, and it would appear that many of your members have come to the same conclusion. Therefore, we would welcome any opportunity to join Buffalo Place in continuing to press the local political leaders on this issue.

Respectfully submitted,

Deborah Lynn Williams
President
New Millennium Group of Western New York

cc: Hon. George E. Pataki
Hon. Anthony M. Masiello
Hon. David Franczyk
Hon. Charles Swanick
Hon. Paul A. Tokasz
Hon. Dale M. Volker
Hon. Byron W. Brown
Hon. Sam Hoyt
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