

December 8, 2025

TOWN OF BRISTOL
COMMUNITY DEV.

Members of the Bristol Planning Board
Town of Bristol
Town Hall
10 Court Street
Bristol, RI 02809

2025 DEC -8 AM 10:57

RE: *FISCAL IMPACT STUDY for D&M Development, proposed hotel*

Dear Members of the Bristol Planning Board,

Please find attached my evaluation of the applicant's Fiscal Impact Study (FIS) pertaining to the proposed 80-room hotel.

It is my opinion that the FIS does not adequately address projected occupancy, target market, and the potential for a conference center. Below is a summary of my concerns, which are outlined with a detailed assessment attached to this letter.

Projected Occupancy Compared to Actual Occupancy

- Occupancy determines hotel viability. Research shows ideal occupancy between 60%-70%, and that seasonality can cause fluctuations in occupancy.
- FIS projects 70% occupancy/365days/year (FIS p.4)
- Spurrier Consulting for D&M Development, LLC 2022 was sourced for this projection.
- This Spurrier source lacks external validation and is circular in that it only reverts back to the FIS. Therefore, the FIS projected occupancy is **not valid**.
- Comfort Inn & Suites reports a 49.8% occupancy rate as of March 2025 and 54.6% for the second quarter ending June 30, with August projections showing a 3% decrease.
<https://investor.choicehotels.com/news-details/2025>
- Bristol Hotel's 1% Tax reports from 2023 and 2024 served as proxies to assess occupancy rates for hospitality venues in Bristol. (Source from RI Department of Revenue)
- Graphs display months on the x-axis (independent variable) and 1% hotel tax revenue per month (rounded to the nearest hundred dollars) on the y-axis (dependent variable)
- Graphs for each year indicate notable seasonal fluctuations; peaks for 6 months and sharp decline for 6 months
- Graphs confirm Bristol's hospitality market fluctuates seasonally, which contradicts and challenges the FIS unsubstantiated source projection of 70%/365days/year.

Conclusion: *The proposed 80-room hotel occupancy is not viable due to the actual occupancy for Bristol, as identified in the RI Department Revenue graphs. These graphs show a significant seasonal occupancy variance. The revenue forecasts identified in the FIS are therefore not valid. Revenue forecasts are directly related to occupancy rates.*

Thank you for your consideration of my review.

Sincerely,



Emily Spinard
35 Dartmouth Street
Bristol, RI 02809

Attachments:

- Assessment of FIS (6 pages)
- Graph of RI 1% 2023 Bristol Hotel Tax
- Graph of RI 1% 2024 Bristol Hotel Tax
- Photo of Designed Flexibility of Comfort Inn *Rise & Shine* prototype
<https://www.businesstravelnews.com/Lodging/Choice-Hotels-Unveils-New-Comfort-Prototype>
- Applicant's first floor plan submittal (A-101) showing lobby/lounge, breakfast room, breakfast serving area, and Flex Room, referred to Conference Room in FIS
- Photo of Comfort Inn prototype showing the Flex Room and flexible lobby/lounge space and breakfast room. <https://www.businesstravelnews.com/Lodging/Choice-Hotels-Unveils-New-Comfort-Prototype>

CONCERNS WITH THE FISCAL IMPACT STUDY

PROPOSED HOTEL DEVELOPMENT

FOR D & M DEVELOPMENT

May 2025

The Applicant submitted a Fiscal Impact Study (FIS) for the proposed 80-room hotel development. According to the FIS, “the FIS will estimate anticipated public revenues and expenses associated with the proposed development.” (FIS p.2) Furthermore, it attempts to project future revenues and expenses related to this project. The FIS paints an optimistic picture of the development’s fiscal impact on the Town of Bristol. However, a critical assessment raises significant questions about how realistic, factual, reliable, and valid the study’s findings and conclusions truly are.

Issues with Source References

While reviewing the FIS, several issues and ambiguities arose, particularly concerning its source references. On page 4, the HOTEL TAX calculation references “Occupancy and Average Yearlong Room Rate projected by Spurrier Consulting for D&M Development, LLC in 2022. Also, projections from Choice Hotels.” Upon researching the ‘Spurrier source,’ it only refers back to this very Fiscal Impact Study, with no evidence of an independent occupancy rate provided by Spurrier Consulting for this specific hotel proposal. Additionally, the mention of projections from Choice Hotels lacks any concrete reference citation, leaving the source of these numbers unverified.

Applicant Identification and Study Preparation

The cover sheet of the FIS indicates that the study was prepared for D & M Development. However, the Master Plan submitted to the Town identifies the Applicant as D & M Boca Development, LLC. This inconsistency presents a need for clarification: Which entity is developing this project? This lack of clarity raises further doubts about the study’s reliability and transparency.

Erroneous and Unsubstantiated Data

Upon closer examination, it is my opinion that the FIS contains erroneous, unsubstantiated, and potentially misleading information. I intend to challenge the FIS’s assumptions by submitting researched facts, including supporting graphs, and to highlight the negative financial impacts I believe this development would have on the Town of Bristol and its residents.

Hotel Tax and FIS Implications

According to widely published research, hotels require an ideal occupancy rate between 60% and 70% to be financially sustainable. For the proposed hotel, this translates to at least 48 rooms occupied at a 60% average yearly rate. Hotels located near supporting facilities—such as convention centers, airports, arenas, or city centers—tend to enjoy higher, less seasonally-affected occupancy rates. Seasonality, however, can cause occupancy rates to fluctuate by as much as 30%. <https://dojobusiness.com/blogs/news/hotel-ideal-occupancy-rate>

For example:

- The 60-room Comfort Inn & Suites in Plainville, MA, benefits from proximity to Gillette Stadium, Wrentham Village Outlets, Plainridge Park Casino, and Plainridge Race Course. <https://www.orbitz.com/Plainville-Hotels-Comfort-Inn-Suites-Plainville-Foxboro.h3014653.Hotel-Information>
- Similarly, the 88-room, 4-floor Comfort Suites in West Warwick-Providence is near TF Green airport, Warwick Malls, and located directly off Route 95. <https://www.hotels.com/ho211500/comfort-suites-west-warwick-providence-west-warwick>

By contrast, the Town of Bristol is a small, historical, and quaint town lacking these types of facilities. As a result, the proposed 80-room hotel would likely experience greater seasonality and sharper occupancy fluctuations, up to 30%, as indicated by the above references.

Problems with Revenue and Occupancy Projections

The FIS projects that the 1% hotel tax will generate \$30,666, based on an assumed **70%** occupancy rate for **365** days and a room rate of \$150 per night (FIS p.4). The source for this projection is cited as Spurrier Consulting for D&M Development, LLC in 2022, and projections from Choice Hotels. Yet, as mentioned, the so-called Spurrier reference refers back only to this FIS, with no externally validated occupancy rate or methodology. In effect, the study uses itself as its own reference, undermining the credibility of its analysis. Furthermore, the cited projections from Choice Hotels are not accompanied by any verifiable reference citation.

However, data from Choice Hotels (Comfort & Suites) for the three months ending March 2025 shows an occupancy rate of just 49.8%. <https://investor.choicehotels.com/news-details/2025> This is significantly lower than the 70% occupancy assumed in the FIS and suggests that the revenue projection is overstated and unsupported. Additionally, the projected \$150/night room rate is questionable; according to publicly available data from Choice Hotel via Google, nightly rates vary considerably by location and season. Without a clear source for this rate, the FIS assumption cannot be considered reliable.

Alternative Data: Rhode Island Hotel Tax Reports

To provide a more accurate and substantiated estimate of expected occupancy, I analyzed the Rhode Island 1% 2024 and 2023 Bristol Hotel Tax Reports (Year-over-Year Collections), using them as a proxy for hotel occupancy in Bristol. The data is sourced from the Rhode Island Department of Revenue for each month in the years of 2023 and 2024. To visualize the data, line graphs for each year were created, with months as the independent variable and the 1% tax revenue (rounded to the nearest hundred dollars) as the dependent variable. (See attached graphs.)

What do the Graphs Show?

The graphs paint a clear picture of pronounced seasonal swings in Bristol's hotel tax revenue, with notable peaks during the summer months. Taken together, these patterns indicate that Bristol's hospitality market is highly sensitive to fluctuations, and any forecast predicted on a flat, year-round occupancy rate is unlikely to reflect the real-world dynamics observed locally. As such, projected annual revenues based on stable occupancy are almost certainly overstated. Moreover, hotels in less commercially connected areas, like Bristol, will be especially vulnerable to these cycles.

Conclusion: The FIS's projected \$30,666 revenue from the 1% hotel tax for this proposed hotel is questionable given the Rhode Island Department of Revenue's Bristol report, which highlights strong seasonality. Attached graphs confirm that occupancy can fluctuate by up to 30% due to seasonal effects.

Roger Williams University (RWU) Implied Role

The FIS notes that RWU is identified as a primary reason for the hotel chain's interest in investing in Bristol (p.2). The statement, "Likely the University strongly supports the addition of this hotel in such close proximity to their campus," suggests support from RWU; however, this has not been substantiated with documentation. As the FIS revenue projections are connected to RWU's implied support, supporting evidence is necessary. Additionally, the projected 70% occupancy rate year-round does not align with data from the Town's 1% hotel tax, raising questions about the assumptions regarding RWU's potential use of the hotel, possibly for student housing.

Conclusion: There is currently no documentation confirming RWU's support for the proposed development. The Applicant is requested to provide formal documentation from RWU, detailing any reasons for supporting the hotel and how it would benefit the university. It should also clarify whether RWU would consider the hotel for student housing purposes. A formal letter from the President of RWU, approved by the Board of Directors, indicating the University's position on the proposed hotel and the rationale for this stance, should be included.

Bristol Large Size Hotel History and Neighboring Portsmouth

Construction of the 6-story King Philip Inn, a 40,365 square foot, and 65-foot height hotel began in March 1990 with an opening date of September 1991. (Bristol Phoenix, July 25, 1991) King Philip Inn is located on a main road near Roger William's University (RWU). King Philip Inn did not survive as a hotel. As early as July 1991, the owner began to advertise one- and two-bedroom efficiencies. RWU leased rooms at King Philip for several years to house several hundred of their students. The University began to pull out students after spring of 2009. (Bristol Phoenix, February 19, 2009) However, students had the option to stay and rent. King Philip Inn, as a hotel, did not last long. It became King Philip Apartments & Suites, offering studio apartments and/or 2-bedroom 2-bath suites. (<https://www.samsonrealty.com/kp/index.html>)

Baypoint Inn right over the Mt. Hope Bridge in Portsmouth did not sustain as a hotel. It became a dorm option for RWU students. Although Baypoint will no longer house students as of July 2025, the facility is still operated by RWU. (<https://pbn.com/roger-williams-university-discontinuing-residential-use-at-baypoint>)

Summary of the history and fiscal effects of large size hotels

1. When a hotel no longer operates as a hotel, the municipality does not collect the 1% hotel tax, nor does the state collect the sales tax. (King Philip) **Loss of projected revenue results.**
2. When RWU owns real estate (dorms) the town loses revenue from the property tax. (Baypoint). Bristol loses approximately \$189,726/year in real estate tax from RWU owned Almeida Apartments. (Bristol real estate tax roll) **Loss of projected revenue results.**
3. When a failed hotel becomes an apartment complex/dorm there is a loss of commercial property. (Parcel for proposed hotel is zoned GB) (“*Do not allow industrial and commercial zoned parcels to be residential.*” Bristol Comprehensive Plan LU-6 p.187)

Large hotels have failed in Bristol and Portsmouth, causing a loss of hotel and property tax revenue and negatively affecting finances.

Concerns Regarding the FIS Tables and Additional Proposed Revenue and Expenses

Table #1 (p.3), which outlines total projected project revenue, states that “Total gross property tax revenue from the proposed 80-room Hotel and **Conference Center** development is \$210,064.”

The **Conference Center** represents a new component of the proposed hotel development and will have its own distinct impacts on the Town. Clarification is needed regarding the size of the Conference Center, its maximum allowable occupancy, anticipated utilization days, and parking

capacity. Furthermore, it is necessary to specify what portion of the projected \$210,064 in revenue can be attributed to the Conference Center.

Also, the projected total appears to be inaccurate, as the existing real estate tax payment of \$5,528 by the applicant does not represent new tax revenue.

Moreover, **Table #1** cites D&M Development, LLC as the source for the hotel's market value but does not reference comparable projects to substantiate this projection. Utilizing data from Comfort Inn & Suites may offer a more reliable basis for estimating projected revenues.

Additional Revenue (p.4)

One-time payments for permits and water and sanitation connections are not classified as revenue. These fees are associated with specific services that incur costs to the Town, such as inspections conducted during construction.

Expenses for Town services (p. 5) and *Table #2*

These expenses must be clearly identified, sourced, and justified. Because if Table 2 uses unsupported and misleading revenue projections, any net revenue estimate for the Town is invalid.

Employment

The FIS notes that “the hotel use in Bristol will generate an additional **50 full-time equivalent jobs...**” (p.7). However, the document does not cite a reference source for this employment projection. While the FIS lists the types of jobs anticipated, it does not detail the number of positions by job type. The document also does not specify whether these jobs are seasonal or permanent, nor does it clarify how many positions are full-time versus part-time.

What is missing from the FIS?

- The **fiscal impact** of the proposed hotel on Bristol's B&Bs, hosting platforms, Harbor Inn, and Airbnb's has not been addressed or analyzed.
- Adverse effects of increased tourism

Explore Bristol, RI (<https://www.explorebristolri.com/>) provides a comprehensive visitor's guide to overnight accommodations. Options include the Bradford-Dimond Norris House, Governor Bradford House, The Munro House, William's Grant Inn, Captain William Richmond House, Evita Properties, and the 40-room Bristol Harbor Inn. In addition, a range of residential Airbnbs is available. The FIS has not addressed the potential financial implications of an 80-room hotel on these existing overnight accommodations.

Page 2 of the FIS notes, “with the 80-room hotel in place, Bristol will stand to attract many more tourists...” However, this assertion lacks specific supporting evidence or references.

Furthermore, the report does not articulate the rationale for how an additional hotel would contribute to increased tourism. Moreover, the FIS also omits discussion of the potential negative impacts associated with higher tourist volumes—particularly for a small town such as Bristol.

Relevant concerns include overcrowding, strain on local infrastructure, road congestion, community resentment, and rising rental prices, among other documented challenges associated with increased tourism activity. <https://sustainabletravel.org/what-is-overtourism/>

Conclusion

The Fiscal Impact Study for the proposed hotel development contains a number of problematic assumptions and unsubstantiated projections regarding both occupancy rates and hotel tax revenue. The sources cited are either circular or lack independent, verifiable references, undermining the validity of the fiscal benefits projected by the applicant. Furthermore, the documented occupancy rates for comparable hotels as well as the actual Town of Bristol hotel tax collections suggest that the FIS's projections are overly optimistic.

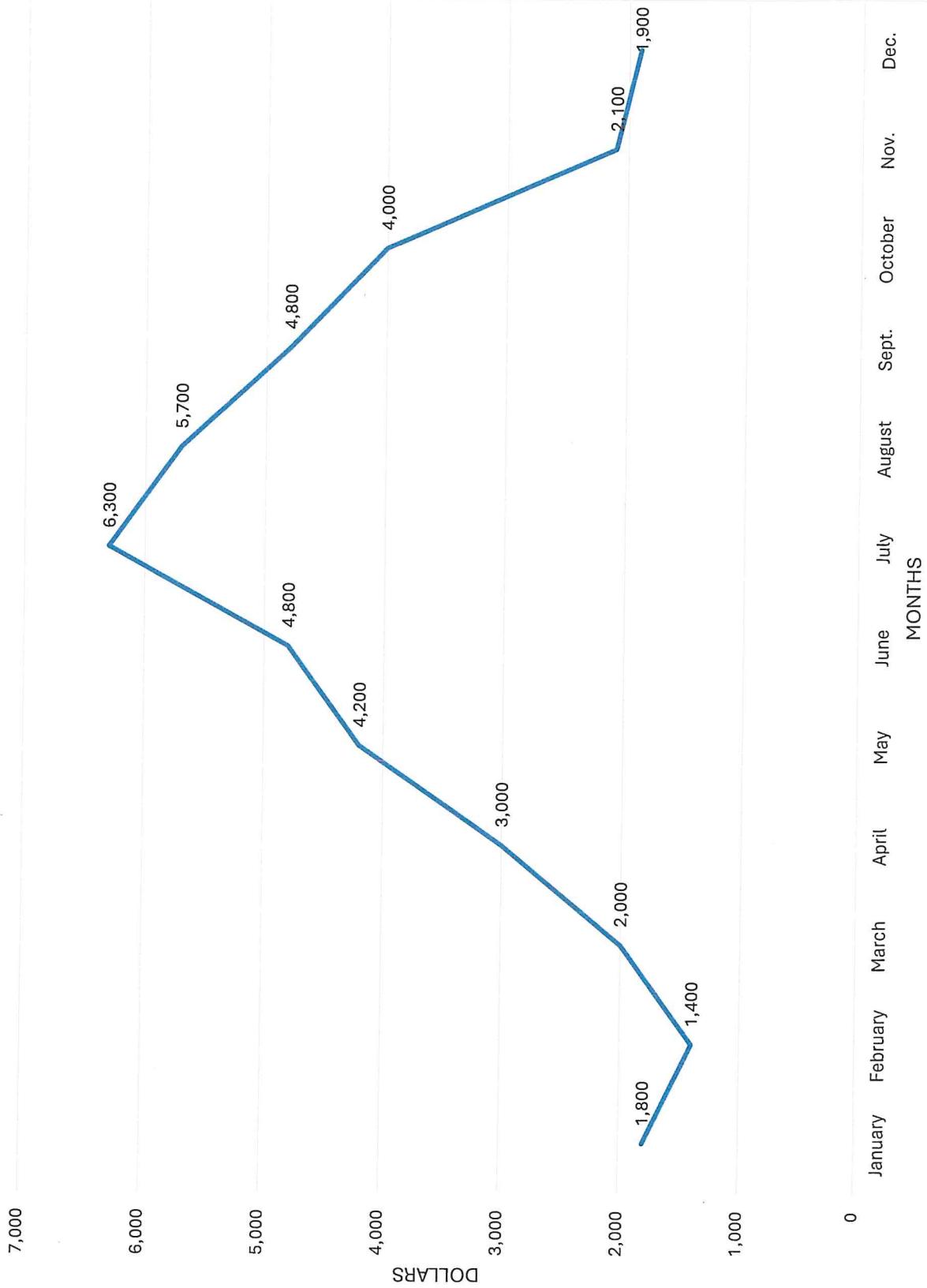
Before moving forward with this development, it is essential that the Town of Bristol seeks independent verification of projected revenues and costs, and demand transparency and accountability from all parties involved in the preparation and submission of fiscal analyses. Only through rigorous, evidence-based review can the true financial impact of this hotel proposal be understood, ensuring the best interests of Bristol and its residents are served.

This discrepancy raises important questions: Are D & M Development and D & M Boca one and the same, or are they separate entities with different roles in the project? If the entities are separate, which holds ultimate responsibility and which should the Town engage with for oversight and accountability? Clarifying the true applicant and their relationship to the project is vital for transparency and for ensuring that any commitments made in the study are enforceable.

RECOMMENDATION

The FIS submittal does not appear to meet the requirements for a realistic and documented projection of revenues and expenses to the Town in relation to the proposed hotel development. Additionally, it does not provide the Planning Board or the Public with a comprehensive assessment of the fiscal impacts. Based on this review, it is recommended that the FIS be revised to include documentation and verification supporting its projections.

RI 1% 2023 BRISTOL HOTEL TAX
(YEAR OVER YEAR)



RI 1% 2024 BRISTOL HOTEL TAX
(YEAR OVER YEAR)

7,000

6,000

5,000

4,000

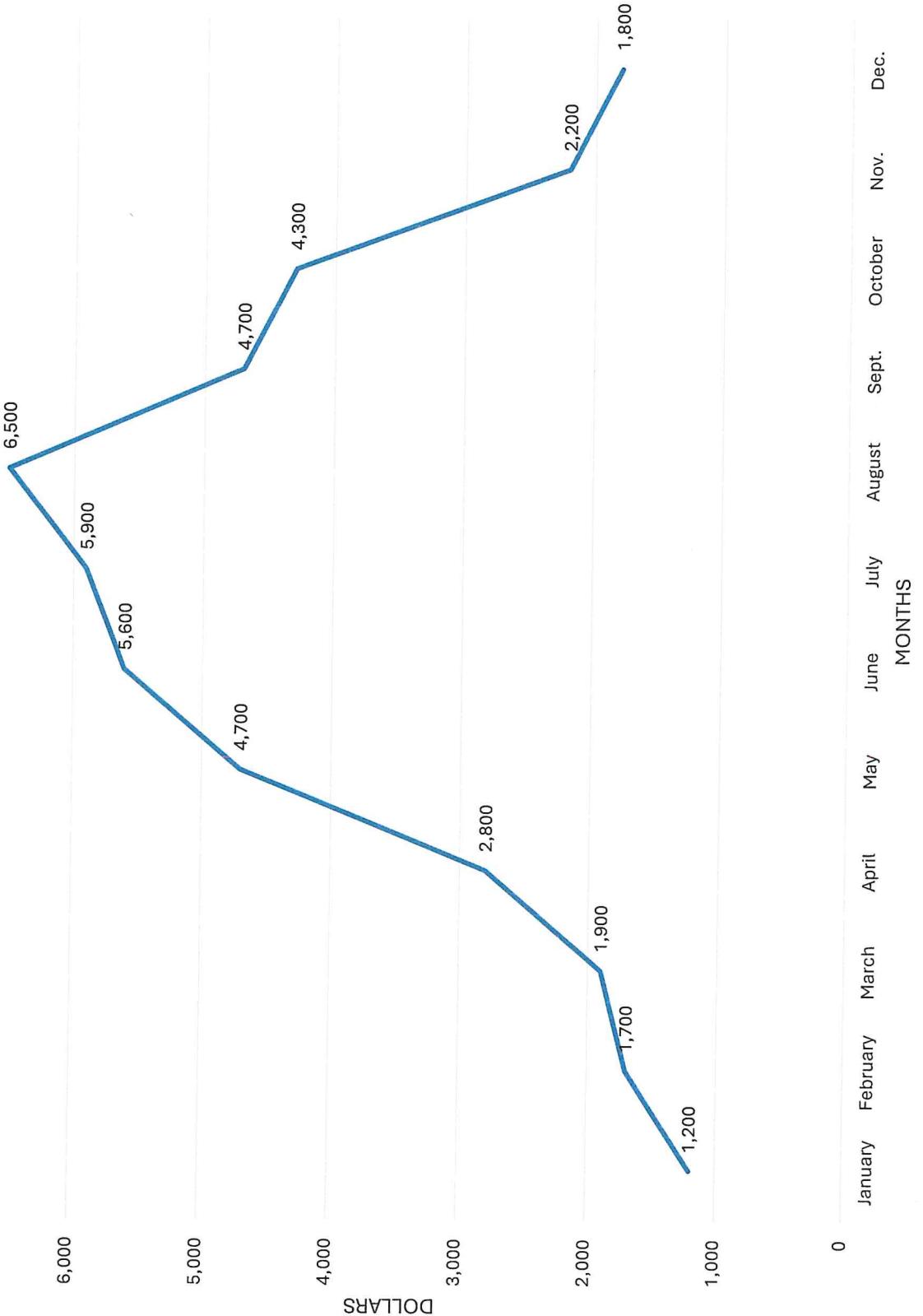
3,000

2,000

1,000

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Our partitioned Flex Room seamlessly transitions from additional breakfast seating in the morning, to meeting space during the day, to a private evening reception space at night. Designed with versatility in mind, this and other multi-functional spaces allow owners to optimize operations and take advantage of the right revenue opportunities for their market.





Comfort Inn

& Suites
PROPERTY ID: RI043
Gooding Avenue
Bristol, RI 02809

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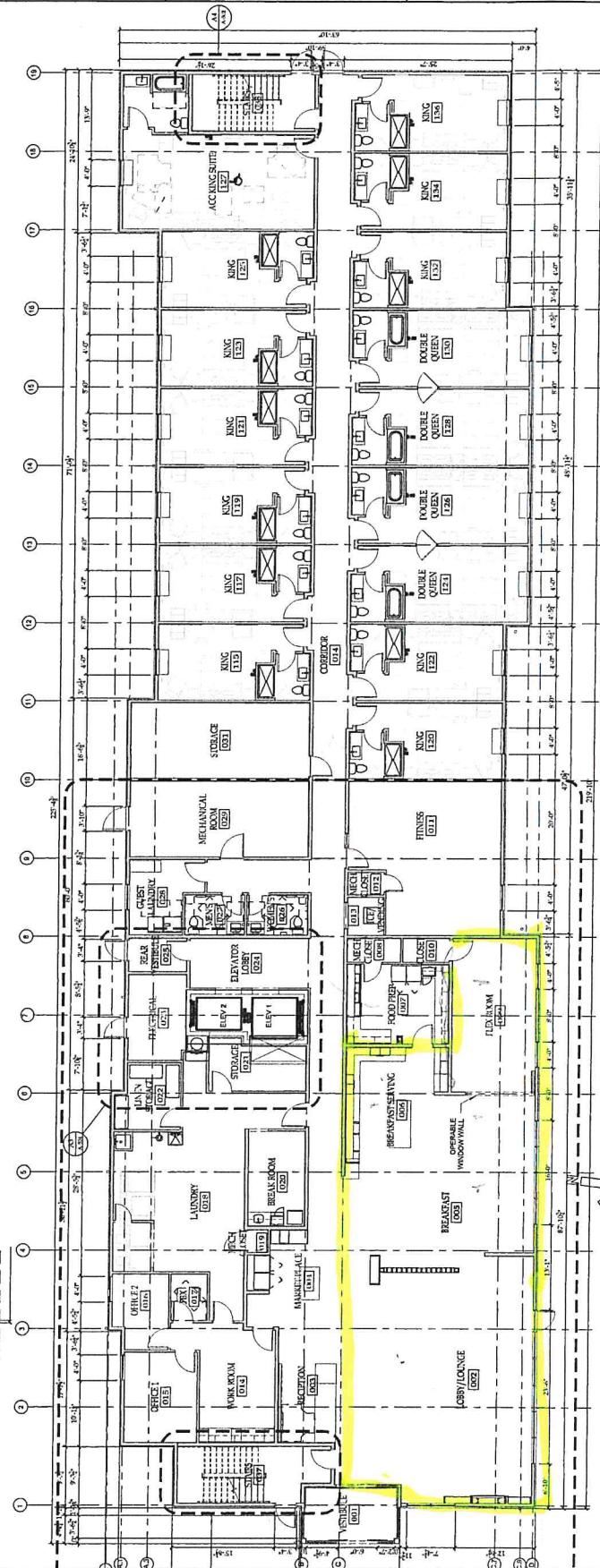
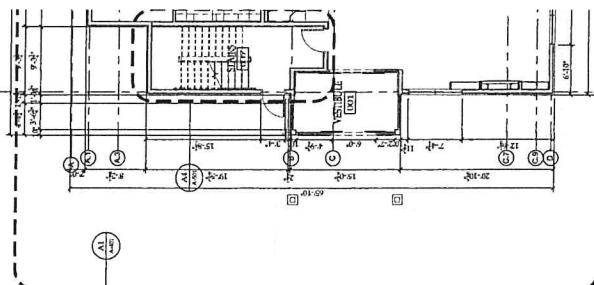
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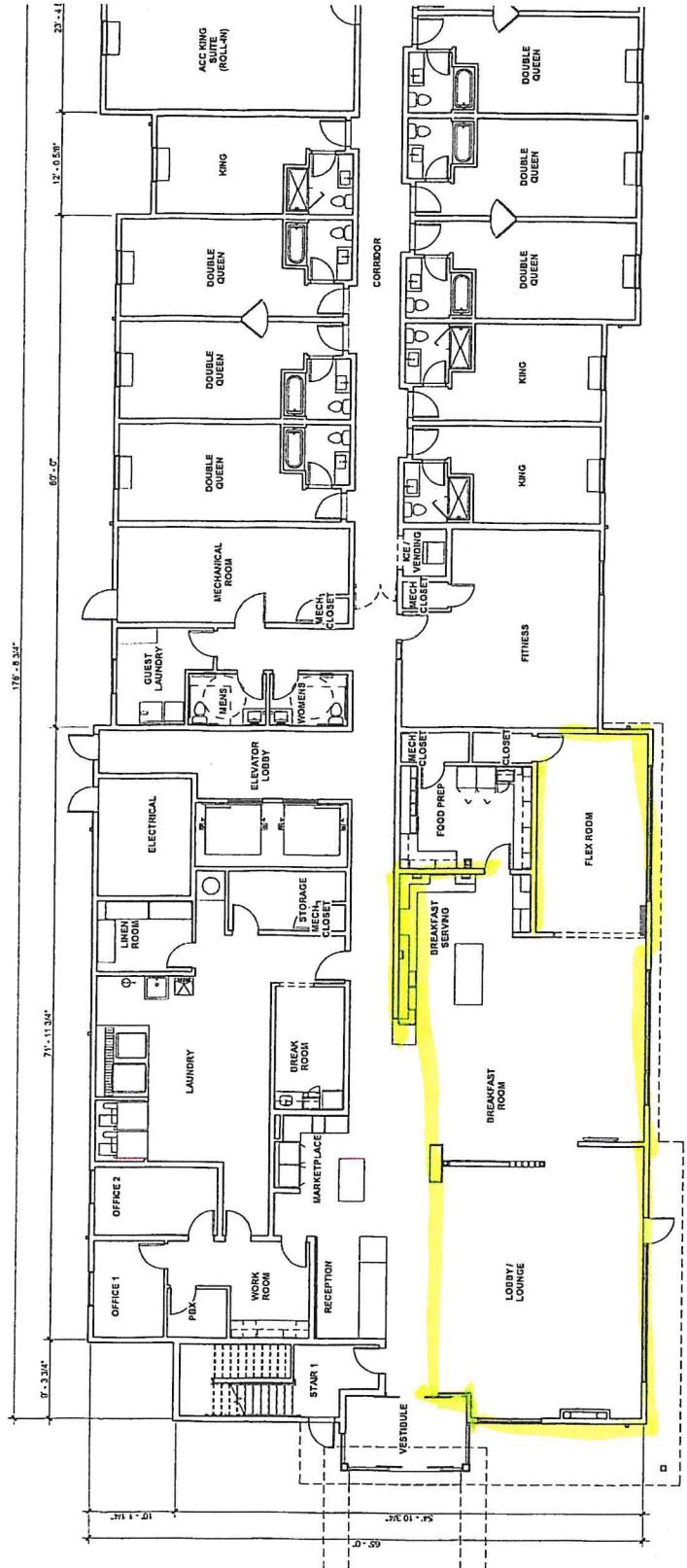
SILVESTRIS

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ALBION, NY 14221 FAX 716.691.4772

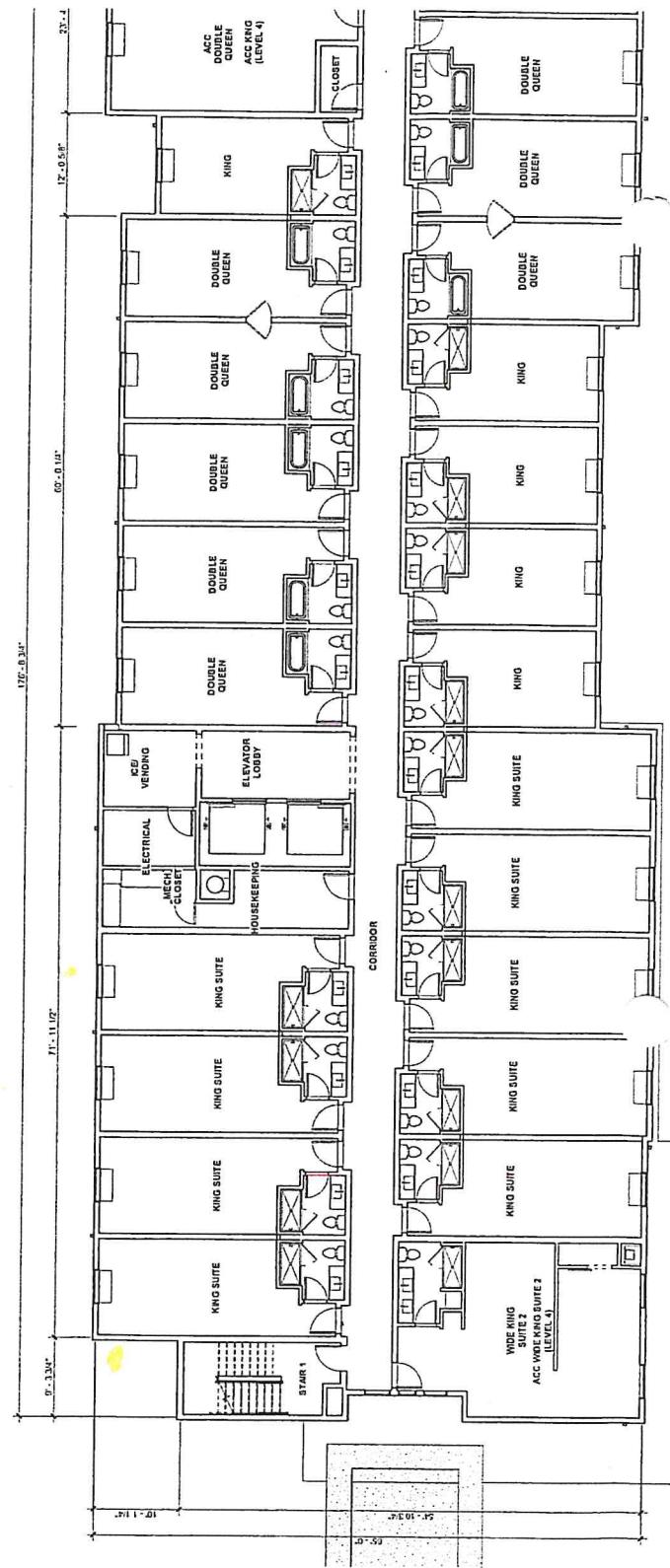
A-101

SUMMARY OF GUEST ROOMS		LEVEL			TOTAL (BY TYPE)
ROOM TYPE	NUMBER	1st	2nd	3rd	
DOUBLE QUEEN	4	7	2	18	
ACCESSIBLE DOUBLE QUEEN	0	1	1	2	
KING	11	13	13	37	
ACCESSIBLE KING	0	1	1	2	
QUEEN	6	4	4	8	
ACCESSIBLE QUEEN	0	3	3	6	
KING SUITE	2	0	0	2	
ACCESSIBLE KING SUITE	0	0	0	0	
ACCESSIBLE KING SUITE	1	0	0	1	
DOUBLE KING	4	3	3	10	
ACCESSIBLE DOUBLE KING	0	0	0	0	
TOTAL # OF ROOMS	44	34	34	138	





Ground Level



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Floor Plans