

Chapter 3

Supplementary Analyses and Information

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Acronyms and Abbreviations

BRT	Bus Rapid Transit
DEIS	Draft Environmental Impact Statement
FEIS	Final Environmental Impact Statement
FTA	Federal Transit Administration
LRT	Light Rail Transit
Metro	Niagara Frontier Transit Metro System, Inc.
Metro Rail	Metro Light Rail Transit System
NFTA	Niagara Frontier Transportation Authority
Project	Buffalo-Amherst-Tonawanda Corridor Transit Expansion
SHPO	New York State Historic Preservation Office
UB	University at Buffalo

3 Supplementary Analyses and Information

In response to public and agency comments on the Draft Environmental Impact Statement (DEIS), this section provides an overview of the Final Environmental Impact Statement (FEIS) supplementary analyses that were prepared for historic and cultural resources and an opinion of probable Project capital costs. Appendix C, “Summary of Comments on the DEIS and Responses,” of the FEIS contains the full record of comments received on the DEIS and responses to those substantive comments.

3.1 HISTORIC AND CULTURAL RESOURCES

The assessment of historic and cultural resources was incorporated into Chapter 4.6, “Historic and Cultural Resources,” of the DEIS, and is accompanied by several appendices that support or relate to the conclusions presented in Chapter 4.6, including; Appendix F1, “Historic and Cultural Resources Supplemental Information;” Appendix F2, “Historic Resources Report;” Appendix F3, “Historic Effects Assessment;” Appendix F4, “Phase 1A;” Appendix F5, “Archaeological Testing Work Plan;” Appendix F6, “Supplemental Background Research;” and Appendix F7, “Section 106 Documentation.”

As described in the Phase IA Study, (Appendix F4, “Phase 1A” of the DEIS), four general areas of archaeological potential exist along the Project alignment (from south to north): 1) portions of the University at Buffalo (UB) South Campus, 2) undisturbed grassy areas and residential lawns beyond the edge of pavement along Niagara Falls Boulevard, 3) portions of the UB North Campus, and 4) deeply buried habitable landforms beneath portions of John James Audubon Parkway. In a response letter dated January 25, 2024, the New York State Historic Preservation Office (SHPO) requested a Phase IB archaeological testing plan. As documented in Appendix F5, “Archaeological Testing Work Plan” of the DEIS, a Phase IB testing plan was submitted to SHPO for review and comment on February 16, 2024.

Following publication of the DEIS, a Phase 1B archaeological investigation (Appendix B1, “Phase 1B Archaeological Investigation” of this FEIS) was conducted for portions of the Project alignment identified as having archaeological sensitivity that have not been previously disturbed. The Phase 1B archaeological investigation involved a site walkover, subsurface testing, and laboratory analysis of the small number of collected artifacts. Subsurface testing was conducted along both the Niagara Falls Boulevard and UB North Campus Project Area of Potential Effect (APE) including 104 test pits along Niagara Falls Boulevard and 55 across the UB North Campus. No cultural artifacts or archaeological resources meeting eligibility criteria were recovered from any of the test pits excavated along Niagara Falls Boulevard and the UB North Campus. In a letter dated November 21, 2025, SHPO concurred with the Project’s No Adverse

Effect finding for archaeological resources, Appendix B2, “Section 106 Documentation” of this FEIS.

3.2 OPINION OF PROBABLE COST

The Niagara Frontier Transit Metro System, Inc. (Metro) developed an opinion of probable capital costs for each Project Build Alternative using the Federal Transit Administration (FTA) Standard Cost Categories. The FTA Standard Cost Categories establish a consistent format for the reporting, estimating, and managing of capital costs for projects that anticipate seeking Federal funding. The opinion of probable cost is draft, based on 15% design of each Build Alternative and will change as the Project design continues to advance. The opinion of probable cost is expressed as a range given the preliminary nature of the Project’s design. In addition, Metro assumed the following when developing the opinion of probable cost ranges.

- Standardized station configurations within UB North Campus have been designed but do not account for enhanced urban integration features desired by UB. An allowance for customized architectural finishes is not included for UB North Campus stations.
- Property acquisition at UB North Campus is anticipated to be an in-kind contribution and is not included.
- Final Project operating plan (proof of concept) and vehicle selection will be completed during final design and may result in changes to the vehicle cost estimates for both Build Alternatives.
- Roadway, signal, and pedestrian investments in support of the Project are included.
- No change to the existing Metro Rail service is assumed.
- Only probable cost for capital is included and does not include any operating cost estimates or finance charges.
- Capital costs are expressed in 2025 dollars as well as 2032 dollars or the anticipated year of expenditure (mid-point of anticipated construction activities).

The LRT Build Alternative’s opinion of probable capital costs is between \$1,580 Million and \$1,940 Million in 2025 dollars. The LRT Build Alternative’s opinion of probable costs is between \$2,010 Million and \$2,470 Million in 2032 dollars.

The BRT Build Alternative’s opinion of probable costs is between \$690 Million and \$860 Million in 2025 dollars. The BRT Build Alternative’s opinion of probable costs is between \$880 Million and \$1,090 Million in 2032 dollars.