

Archaeological Work Plan

Buffalo-Amherst-Tonawanda Corridor Transit Expansion, Erie County, New York

Prepared by:



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Management Summary

OPRHP Project Review Number: 19PR01900

Involved Agencies: Federal Transit Administration and Niagara Frontier Transportation Authority

Phase of Survey: Archaeological Testing Plan - DRAFT

Location Information

Location: New York

Minor Civil Division: Amherst, Buffalo, and Tonawanda

County: Niagara

Survey Area

Length: ~7 miles

Width: ~50 feet

Area: ~40 acres

USGS 7.5 Minute Quadrangle Map: Buffalo

Report Author: A. Michael Pappalardo, MA, RPA

Date of Report: April 2024

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Archaeological Work Plan

Buffalo-Amherst-Tonawanda Corridor Transit Expansion

Erie County, NY

A. INTRODUCTION

The Federal Transit Administration (FTA), as lead Federal agency, and the Niagara Frontier Transit Metro System, Inc. (Metro), as the local Project Sponsor and joint lead agency, are preparing an Environmental Impact Statement (EIS) to evaluate potential benefits and impacts of expanding high-capacity transit from Buffalo, New York to Amherst and Tonawanda, New York (the Project) (see **Figure 1**). This work will be conducted in accordance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), which requires Federal agencies, in consultation with stakeholders, to take into account the potential effects of their actions on historic properties within “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties [the Area of Potential Effect or APE], if such properties exist” (36 CFR § 800.16[d]). Historic properties consist of National Register-listed or eligible buildings, structures, sites, objects, or districts and include historic resources and archaeological resources (“cultural resources”). In accordance with Section 106 of NHPA, AKRF prepared a Phase 1A Archaeological Documentary Study to assist in the identification of potential archaeological resources that could be affected by the Project. In a review letter of that document dated December 19, 2023, the State Historic Preservation Office (SHPO) concurred with the Phase 1A’s recommendation for archaeological monitoring and/or Phase 1B testing and requested a draft plan that documents the scope of that work.

This Archaeological Work Plan has been prepared in response to the SHPO’s request and provides a summary of the Project’s archaeological sensitivity and proposed methods for determining the presence or absence of archaeological resources that could be affected by the Project, which would be conducted after completion of the EIS and as a condition of the NEPA evaluation.

B. PROJECT DESCRIPTION

The proposed Project is an extension of the existing Metro Rail Light Rail Transit (LRT) from its current terminus, at University Station on the University at Buffalo (UB) South Campus, an additional 7 miles, through the UB North Campus to Interstate 990 (I-990) (**Figure 1**). Though the Locally Preferred Alternative for the Project is for the extension to run on an additional 7 miles of LRT, the EIS also considers the effects of a Bus Rapid Transit (BRT) alternative. Both the LRT and BRT alternatives would occur within the same Project corridor, but the LRT would require construction of tracks and other features while the BRT would use the existing roadways and involve fewer ground surface impacts.

PROJECT CORRIDOR

As shown on **Figures 2** and **3**, the route of the Project would follow Kenmore Avenue to the west from the UB South Campus, turn north on Niagara Falls Boulevard, turn east on Maple Road, turn north on Sweet Home Road, and wind through the UB North Campus to John James Audubon Parkway and I-990.

Ten stations are proposed as part of the 7-mile extension with two stations each containing a park & ride facility. A light maintenance/storage facility is proposed at the end of the line.

GROUND DISTURBING IMPACTS: LRT BUILD ALTERNATIVE

Construction activities for the LRT Build Alternative would include dedicated median running light-rail tracks, tunnel and emergency exit stair shafts, ventilation shafts, overhead contact system, vehicle power substations, signal bungalows, traffic signal and safety systems, platforms, and ancillary facilities. Widening of roadway facilities to account for median running light-rail tracks, along with relocation of underground utilities and storm drainage would also occur along the corridor. Construction would also include temporary works to maintain vehicular and pedestrian traffic.

AREAS OF GROUND DISTURBANCE

Construction depths within the existing roadway facilities of Niagara Falls Boulevard, Maple Road, Sweet Home Road, within the UB North Campus along their internal parking lots and service roads, Lee Road, and Audubon Parkway where roadway widening excavation is required would be between 5 and 10 feet. This considers potential utility relocations due to adding the LRT tracks in the median and for widening the roadway, roadway subsurface materials, and drainage. At each station platform the depths would range between 10 and 15 feet, while substation depths of excavation would range between 5 and 10 feet. For the two park-and-ride lots, excavation depths would range between 5 and 10 feet for construction.

In order to construct the twin transit tunnels at UB South Campus, a shaft would be constructed at the north end of UB South Campus near Main Street to allow a sequential excavation method (SEM) process to be utilized (in combination with hard rock drill-and-blast method) to connect the tunneling section between Main Street and the existing end of the LRT. The shaft would be about 80 feet wide and 50 feet long, which accounts for the ability to transport the construction and boring equipment from the surface to tunnel depth. The shaft area will be constructed at UB South Campus in the Allen Parking Lot, between Main Street and Goodyear Road. The orientation of the shaft area would be parallel to the tunnel alignment. An additional 160 feet by 100 feet in length would be the staging area needed for boring, blasting, and assembling of construction materials.

For the construction of the underground tunnel within UB South Campus and under Kenmore Avenue and Niagara Falls Boulevard, excavation depths would vary depending on where the rock formation ends and the existing depth of the underground tunnel for the existing LRT. Within UB South Campus where the existing LRT ends, the tunnel depth for SEM construction of a tunnel would range between 60 and 70 feet. As the alignment veers towards Kenmore Avenue, the depth would range between 50 and 60 feet under Main Street. Along Kenmore Avenue, construction would shift to a cut and cover method with a depth ranging between 30 and 50 feet. As the alignment shifts under the intersection of Kenmore Avenue and Niagara Falls Boulevard, and under Niagara Falls Boulevard to the portal location, the depth would range between 10 and 30 feet.

For the construction of the grade separation at Maple Road and Sweet Home Road (LRT would go under the intersection), depth of construction to convert the intersection into a grade separation would range between 10 and 30 feet. **Appendix A** in the Phase 1A Archaeological Documentary Study (October 2023) provides detailed maps of anticipated Project locations and estimated depths of disturbance.

STAGING AREAS

The following locations have been identified for construction staging:

- UB South Campus Allen Hall parking lot
- Northeast corner property of Kenmore Avenue and Niagara Falls Boulevard
- Southeast corner property of Eggert Road and Niagara Falls Boulevard
- Southeast corner property of Maple Road and Niagara Falls Boulevard
- Northwest corner property of Maple Road and Sweet Home Road
- UB Jacobs A parking lot east of Flint Entrance and north of Augspurgen Road
- UB parking lot on northwest corner of Lee Road and Audubon Parkway
- Northeast corner of Audubon Parkway and Gordon Yaeger Drive
- Property north of the I-990 and Audubon Parkway interchange.

Ground disturbance at staging areas is expected to be limited to one to two feet below current grade, unless the ground surface is paved, in which case no ground disturbance would be expected.

GROUND DISTURBING IMPACTS: BRT BUILD ALTERNATIVE

Construction of the BRT Build Alternative would include dedicated running BRT travel lanes, traffic signal priority, platforms, and ancillary facilities. Widening of roadway facilities to account for median running BRT lanes, along with relocation of underground utilities and storm drainage would also occur along the corridor. Construction would also include temporary works to maintain vehicular and pedestrian traffic.

AREAS OF GROUND DISTURBANCE

Construction depths within the existing roadway facilities of Niagara Falls Boulevard, Maple Road, Sweet Home Road, within UB North Campus along their internal parking lots and service roads, Lee Road, and Audubon Parkway where roadway widening excavation is required would be between 5 and 10 feet. This considers potential utility relocations due to adding the BRT dedicated travel lanes in the median for widening the roadway, roadway subsurface materials, and drainage. At each station platform the depths would range between 10 and 15 feet. For the two park-and-ride lots, excavation depths would range between 5 and 10 feet for construction.

STAGING AREAS

The following locations have been identified for construction staging:

- Northeast corner property of Kenmore Avenue and Niagara Falls Boulevard
- Southeast corner property of Eggert Road and Niagara Falls Boulevard
- Southeast corner property of Maple Road and Niagara Falls Boulevard
- Northwest corner property of Maple Road and Sweet Home Road
- UB Jacobs A parking lot east of Flint Entrance and north of Augspurgen Road
- UB parking lot on NW corner of Lee Road and Audubon Parkway
- Northeast corner of Audubon Parkway and Gordon Yaeger Drive
- Property north of the I-990 and Audubon Parkway interchange.

Ground disturbance at staging areas is expected to be limited to one to two feet below current grade, unless the ground surface is paved, in which case no ground disturbance would be expected.

C. REGULATORY CONTEXT

The Project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) (54 U.S.C. 300101 et seq.) and its implementing regulations (36 C.F.R. Part 800). Section 106 of the NHPA requires federal agencies consider the effects of their actions on historic properties, including archaeological resources.

Archaeological resources are defined as precontact and historic sites listed in or eligible for listing in the NRHP. Section 106 requires the lead federal agency, in consultation with the State Historic Preservation Officer (SHPO), to develop the Area of Potential Effects (APE), identify historic properties in the APE, and assess the proposed project's effects on historic properties in the APE. Section 106 regulations require that the lead federal agency consult with the SHPO, consulting parties, and the public during planning and development of the proposed project. The federal Advisory Council on Historic Preservation may participate in the consultation or may leave such involvement to the SHPO and other consulting parties who have a demonstrated interest in the undertaking. These agencies, groups, and individuals may participate in developing a Memorandum of Agreement or Programmatic Agreement to avoid, minimize, or mitigate adverse effects as applicable.

As part of the Section 106 process, agency officials apply the NRHP Criteria for Evaluation. A property is eligible for the NRHP if it is significant under one or more of the following criteria defined in 36 CFR § 60.4 as “the quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

- A: Are associated with events that have made a significant contribution to the broad patterns of our history; or
- B: Are associated with the lives of persons significant in our past; or
- C: Embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or
- D: Have yielded, or may be likely to yield, information important in prehistory or history.”

Criterion D applies primarily to archaeological resources. According to guidance found in the NRHP Bulletin “How to Apply the National Register Criteria for Evaluation,” different aspects of integrity may be more or less relevant depending on why a specific historic property was listed in or determined eligible for listing in the NRHP.

Consultation will continue with SHPO and consulting parties to seek ways to avoid, minimize, or mitigate adverse effects, which will include development of a project-specific Memorandum of Agreement to memorialize these decisions and conclude the Section 106 process.

D. AREA OF POTENTIAL EFFECTS

As defined at 36 C.F.R. § 800.16(d), the APE is “the geographic area or areas which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

For archaeological resources, the APE is limited to areas subject to ground disturbance (see **Figure 4**). This disturbance could consist of excavation, construction, or ground surface compaction that could occur

through the staging of construction materials or the movement of heavy machinery. The APE was submitted to SHPO on April 8, 2020 as part of the Historic Resources Report (NFTA 2020) and then again in August 2022 with a detailed series of maps indicating the locations and expected depths of disturbance (included as **Appendix A** in the Phase 1A report).

E. ARCHAEOLOGICAL SENSITIVITY ASSESSMENT

The Phase 1A sensitivity assessment involved reviewing previously completed sensitivity assessments for other project sites along the 7-mile Project corridor and site file information for previously discovered archaeological sites located within 0.75 miles of the Project corridor, both accessed through the CRIS on-line site file database maintained by the SHPO, and supplemental research to assess the effects of historic and modern development. The supplemental research consisted of a review of historic maps to understand the developmental history of the corridor, an examination of photographs taken during fieldwork for the historic structures analysis, completion of a virtual walkover using Google's "street view" mapping tool and Google Earth's historical imagery for development activities over the past 20 to 30 years, and examination of collected information regarding subsurface impacts including utilities.

Based on the results of previous archaeological surveys and the archaeological site-file review, the Project alignment would be considered sensitive for the presence of precontact archaeological resources in well-drained level areas near fresh water sources and historic archaeological resources along historic roadways and map-documented structures. However, intensive modern development such as road construction and the installation of utilities along the Project alignment has likely disturbed or destroyed most of the original ground surface. This appears to be the case for Niagara Falls Boulevard, Maple Road, and Sweet Home Road. Only four portions of the Project alignment appear to retain archaeological sensitivity, as follows (from south to north):

- Unpaved or minimally disturbed areas within the UB South Campus such as the grassy areas and parking lots along the campus' northwestern edge.
- Undisturbed grassy lawns beyond the edge of pavement within the Niagara Falls Boulevard right-of-way.
- Unpaved or minimally disturbed areas within the UB North Campus such as grassy areas, sidewalks, and parking lots.
- Original ground surfaces and stream terraces in the vicinity of Ellicott Creek buried beneath fills beneath John James Audubon Parkway.

F. PROPOSED PHASE 1B ARCHAEOLOGICAL SURVEY METHODS

The Phase 1A assessment determined that components of the Project will impact four general areas of archaeological potential. However, additional work is necessary to more specifically understand the effects of past development and local conditions on the likelihood of site preservation in each area and to determine the actual presence or absence of archaeological resources and their NRHP eligibility.

Supplemental site-specific research is necessary to assess past development of the location of the staging and shaft area proposed in the UB South Campus, lawns along Niagara Falls Boulevard, grass-covered and minimally to moderately disturbed areas along the Project route through the UB North Campus, and to assess the potential for habitable landforms beneath John James Audubon Parkway. Sources of information could include the results of geotechnical soil borings and utility location surveys currently

underway. Additional information can be gathered through additional documentary research and consultation with UB operational staff.

Subsurface testing or archaeological monitoring would be necessary to determine the presence or absence of archaeological resources in specific areas of moderate to high potential. This testing is proposed to consist of monitoring the excavation of backhoe trenches in the location of the staging and shaft area proposed in the UB South Campus before construction and the hand excavation of shovel test pits in grass covered areas of archaeological potential along Niagara Falls Boulevard and UB North Campus. Additional testing may be necessary to determine the NRHP eligibility of any identified resources. Any archaeological monitoring or testing would be planned in consultation with the NYSHPO and be conducted in concordance with applicable state and federal laws and guidance. The following outlines the steps of the proposed testing plan:

SUPPLEMENTAL RESEARCH AND WALKOVER SURVEY

Background research conducted during preparation of the Phase 1A would be supplemented as part of the Phase 1B effort. For each area of archaeological potential, the Consultant that would conduct the testing will first systematically review utility mapping, aerial photographs, and maps and atlases to develop a more specific understanding of archaeological potential. Field maps would then be developed to support the field visit. An experienced archaeologist would also visually examine each area for evidence of previous disturbance or the potential for site preservation and document such evidence through photography and map annotations. This will be documented through field notes, photographs, and any pre-existing maps (anticipated to be provided by Project Proponent) in the final report.

REVIEW OF GEOTECHNICAL BORING LOGS AND UTILITY SURVEY DATA

The Consultant conducting the work will review any geotechnical soil borings or utility location surveys available and incorporate the results of the borings and survey into the sensitivity analyses. Of particular interest will be those borings performed along the John James Audubon Parkway, as they may provide evidence of the depth of modern fill and deeply-buried historic ground surfaces associated with the area's streams.

PHASE 1B TESTING

Subsurface testing in the form of shovel test pits and backhoe trenches would occur before construction to determine the presence or absence of archaeological resources in specific areas of moderate to high potential. Any subsurface testing or trenching would be planned in consultation with the NYSHPO and be conducted in concordance with applicable state and federal laws and guidance under the direction of a qualified 36 CFR 61 archaeologist and in compliance with relevant OSHA regulations.

It may be logistically complicated to evaluate deeply buried landforms beneath the John James Audubon Parkway portion of the Project. Consideration of testing in this area would not occur at this stage, as a review of soil logs would first be performed. As Project impacts in this area are better understood, follow up testing could be required in this area.

NIAGARA FALLS BOULEVARD AND UB NORTH CAMPUS

Grass-covered areas, specifically the yards of residences fronting Niagara Falls Boulevard and open fields on the UB North Campus, would be tested through the excavation of shovel test pits. It is assumed that 40 to 60 test pits will be required to investigate Niagara Falls Boulevard and 50 to 80 test pits will be required to investigate the UB North Campus. It is assumed that individual property owners will be notified of this fieldwork beforehand by others. All test pits will be excavated by hand to sterile subsoil, if

possible. Excavated soils will be hand-screened through ¼-inch hardware cloth, and all cultural materials remaining in the screen will be bagged and labeled by testing unit, soil stratum, and level. The count and type of all recovered cultural materials will be noted on field forms. Soil profiles, including depths of soil horizons, Munsell colors, and textures, will be recorded for each test pit on standard test pit profile forms. Measured profiles and plans will be drawn for all belowground features and structural remains identified in test pits. Digital images will be taken of any identified cultural deposits or features, representative soil profiles, and the general project area. No test pits will be left open overnight and all test pits will be filled in and restored to their original surface contour.

UB SOUTH CAMPUS

The archaeologically sensitive parking lot at UB South Campus is paved and will be investigated through archaeologically monitoring the excavation of up to 6 backhoe trenches before construction. Individual backhoe trench locations will be established in coordination with UB South Campus operations staff to avoid known utilities and to minimize impacts to car flow and parking, but **Figure 5** provides their approximate location. Each trench will have approximate dimensions of 4 feet by 10 to 15 feet, will be marked with spray paint and saw cut. Excavation will proceed in shallow lifts of 6 to 12 inches through the parking lot surface to sterile subsoil or bedrock, which is evidently shallow in this area. At the completion of each lift, or at any point requested by the monitoring archaeologist, excavation will stop, and the archaeologist will enter the trench to examine the trench floor and walls. During these periodic examinations, the archaeologist will shovel skim and trowel the trench's floor and walls to look for artifact deposits, structural remains, or any other evidence of archaeological resources. If any such resources are observed, the archaeologist will sufficiently clear the area to determine the presence or absence of an archaeological resource and its horizontal extent within the trench. The resource will then be sampled through the excavation of a shovel test pit or small unit to determine its potential depth and artifactual content. Depending on the type of resource encountered, it will either be excavated or covered with a tarp and clean fill and reburied for later evaluation if it will be affected by the Project. In the unlikely event that human skeletal remains, or evidence of burial shafts or coffins, are observed during this process, the field team will follow the procedures described in **Appendix A, Unanticipated Discoveries Plan**.¹

Excavation may exceed a depth of 4 feet below grade in some locations. Therefore, all monitoring and testing will be completed in compliance with the standards of the United States Department of Labor's Occupational Safety and Health Administration (OSHA) pertaining to safe excavation practices and in compliance with the project Health and Safety Plan (HASP). No project personnel will enter unshored trenches that are deeper than 4 feet below the ground surface.

Artifacts will be observed and sampled and the count and type of all recovered cultural materials will be noted on field forms. Soil profiles, including depths of soil horizons, Munsell colors, and textures, will be recorded for each trench on standard profile forms. Measured profiles and plans will be drawn for representative trench walls and all belowground features and structural remains. Digital photographs will be taken of any identified cultural deposits or features, representative soil profiles, and the general project area. No trench will be left open overnight and each trench will be filled in and restored to its original surface contour with the excavated soils.

¹ Human remains associated with the Erie County Poorhouse Burial Ground (USN 02940.024949) have been documented in a number of locations several hundred feet southeast of the area proposed for the archaeologically monitored trenches.

ARTIFACT PROCESSING AND ANALYSIS

All recovered cultural materials will be brought to AKRF's laboratory facility or a suitable local alternative, for processing and analyses. These activities will include cleaning, identification, and cataloging of any recovered cultural materials; the preliminary analysis of spatial distributions of cultural materials; and artifact photography of diagnostic or representative artifact types as appropriate. Artifacts will be cataloged by unique artifact grouping in a relational database system. Recorded fields include an artifact's material, function, manufacturing techniques, and date ranges.

Following laboratory processing and cataloging activities, all recovered cultural materials will be stored in acid-free Hollinger boxes with box content lists and labels printed on acid-free paper. These boxes will be temporarily stored in accordance with the Secretary of the Interior's Standards 36 CFR 79 Curation of Federally Owned and Administered Archeological Collections. Following completion of project responsibilities, the assemblage will be temporarily curated until identification of a long-term repository or disposal, if so directed by the appropriate property owner.

TECHNICAL MEMORANDUM AND REPORT PREPARATION

Within several weeks of completing fieldwork and review of the results, the Consultant conducting the work will prepare an end-of-fieldwork memorandum providing a summary of the results of the field effort and preliminary conclusions. Subsequent to the review of the memorandum by the Project Proponent, the Consultant will prepare a technical report that meets state reporting requirements for archaeological assessment surveys. It is not anticipated that the memorandum would undergo any agency or client reviews but is an informative summary of previous task work that will be used as the basis for the ultimate report.

One technical report will be prepared for all project locations subjected to subsurface testing. The report will describe the research design and fieldwork methodology including archival sources consulted; environmental setting and cultural contexts for each Project location; results and interpretations of the fieldwork; and recommendations for the treatment of identified cultural deposits. The report will be illustrated with Project location maps, historical maps and images as appropriate, field drawings, and photographs. Report appendices will include the laboratory catalog of recovered cultural materials, and relevant soil boring logs. The Consultant will use the OPRHP's CRIS on-line system to submit archaeological inventory forms for any newly discovered sites.

The technical report will follow the guidelines established by the National Park Service in the Recovery of Scientific, Prehistoric, Historic, and Archaeological Data (36 CFR Part 66, Appendix A) and the OPRHP and New York Archaeological Council. *

APPENDIX A: UNANTICIPATED DISCOVERIES PLAN

Throughout the second half of the 19th century and into the early 20th century, Erie County established and operated a poorhouse and associated structures and farmland across the present location of the UB South Campus. According to the 2016 New York State Historical Archaeological Site Form prepared for the property by the SUNY Buffalo Archaeological Survey,¹ the property included a cemetery, the Erie County Poorhouse Cemetery, which is estimated to have been active from c. 1850 to 1900. Though no historic records regarding the horizontal limits of the cemetery have been identified, and it has never been subjected to a systematic archaeological investigation, human remains have been encountered through various subsurface disturbances at 44 locations across a broad area in the northeast portion of the UB South Campus. **Figure 5** in the work plan indicates the approximate area of archaeological sensitivity for the presence of remains associated with the cemetery, as included in the site form.

The State Historic Preservation Office/New York State Office of Parks, Recreation and Historic Preservation has provided the following protocol regarding the unanticipated discovery of human remains.² This protocol will be followed in the event human remains or suspected human remains are encountered during archaeological testing at the UB South Campus.³

- Human remains shall be treated with dignity and respect. Should human remains or suspected human remains be encountered, work in the general area of the discovery shall stop immediately and the location shall be secured and protected from damage and disturbance.
- If skeletal remains are identified and the archaeologist is not able to conclusively determine if they are human, the remains and any associated materials shall be left in place. A qualified forensic anthropologist, bioarchaeologist or physical anthropologist shall assess the remains in situ to help determine if they are human.
- If the remains are determined to be human, law enforcement, the SHPO, the appropriate Indian Nations, and the involved state and federal agencies shall be notified immediately. If law enforcement determines that the burial site is not a criminal matter, no skeletal remains or associated materials shall be removed until appropriate consultation takes place.
- If human remains are determined to be Native American, they shall be left in place and protected from further disturbance until a plan for their avoidance or removal is developed. Please note that avoidance is the preferred option of the SHPO and the Indian Nations. The involved agency shall consult SHPO and the appropriate Indian Nations to develop a plan of action. Photographs of Native American human remains and associated materials should not be taken without consulting with the involved Indian Nations.
- If human remains are determined to be non-Native American, the remains shall be left in place and protected from further disturbance until a plan for their avoidance or removal is developed.

¹ Accessed at cris.parks.ny.gov on April 15, 2024.

² New York State Office of Parks, Recreation and Historic Preservation Human Remains Discovery Protocol. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. 2015.

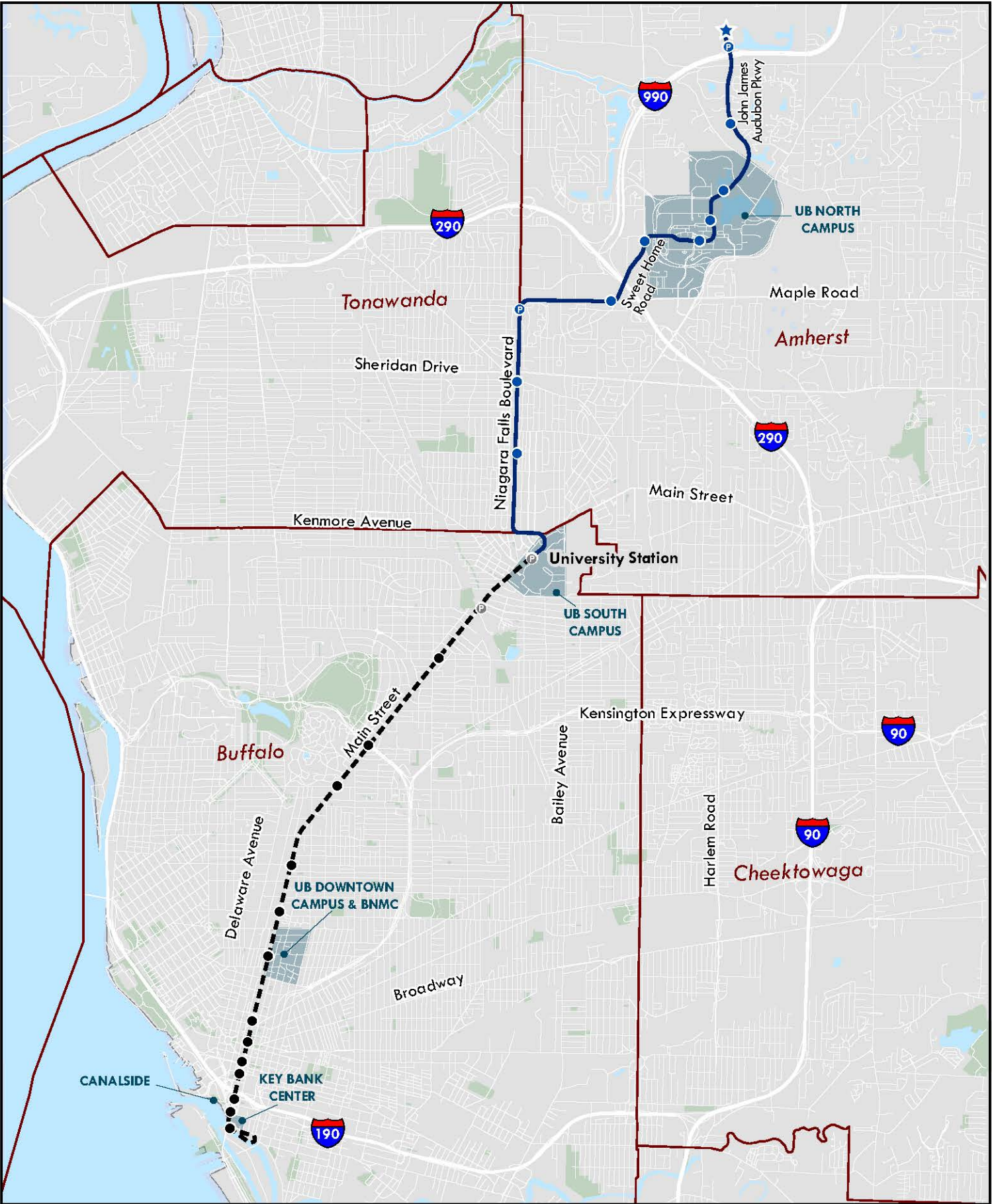
³ In the event of the discovery of human remains, additional coordination with the New York State Archaeologist may also be necessary per the *New York State Unmarked Burial Protection Act*. The identification of and consultation with a group representing the descendant community is also a requirement of this law.

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Please note that avoidance is the preferred option of the SHPO. The involved agency shall consult SHPO and other appropriate parties to develop a plan of action.

- The SHPO recommends that burial information is not released to the public to protect burial sites from possible looting.

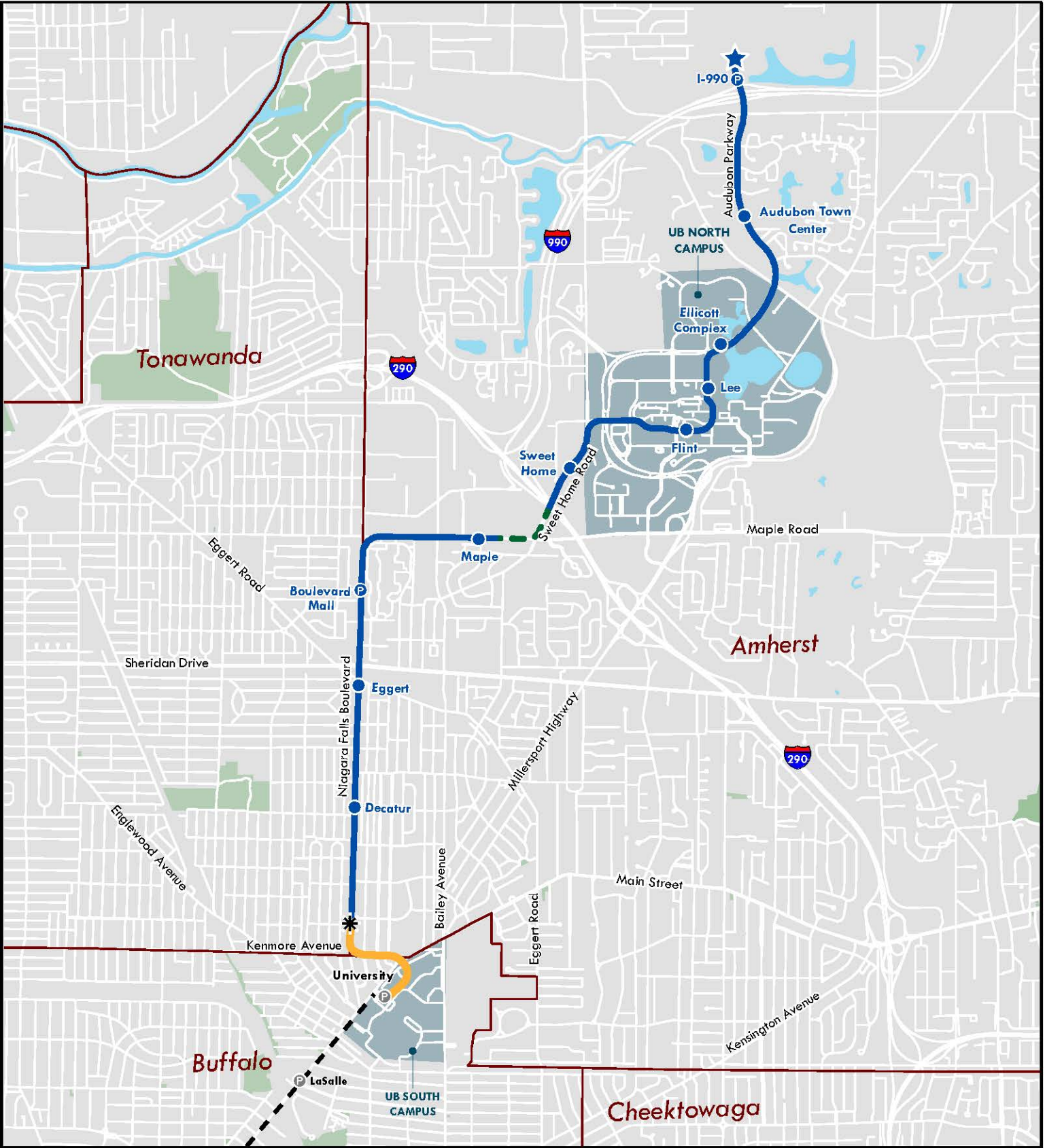
Figure 1. Metro Rail Existing and Proposed Project



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Figure 2. LRT Build Alternative



Buffalo-Amherst-Tonawanda Corridor Transit Expansion

- Dedicated Transitway
- Tunnel
- Light-rail Grade Separated
- Proposed Station
- Proposed Storage/Light Maintenance Facility
- Proposed Station with Park & Ride
- Portal
- Existing Metro Rail Line
- Existing Station with Park & Ride
- City and Town Boundary

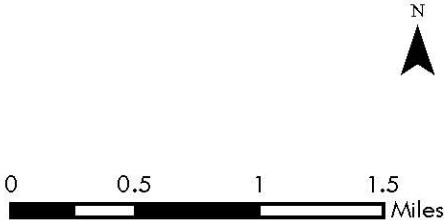
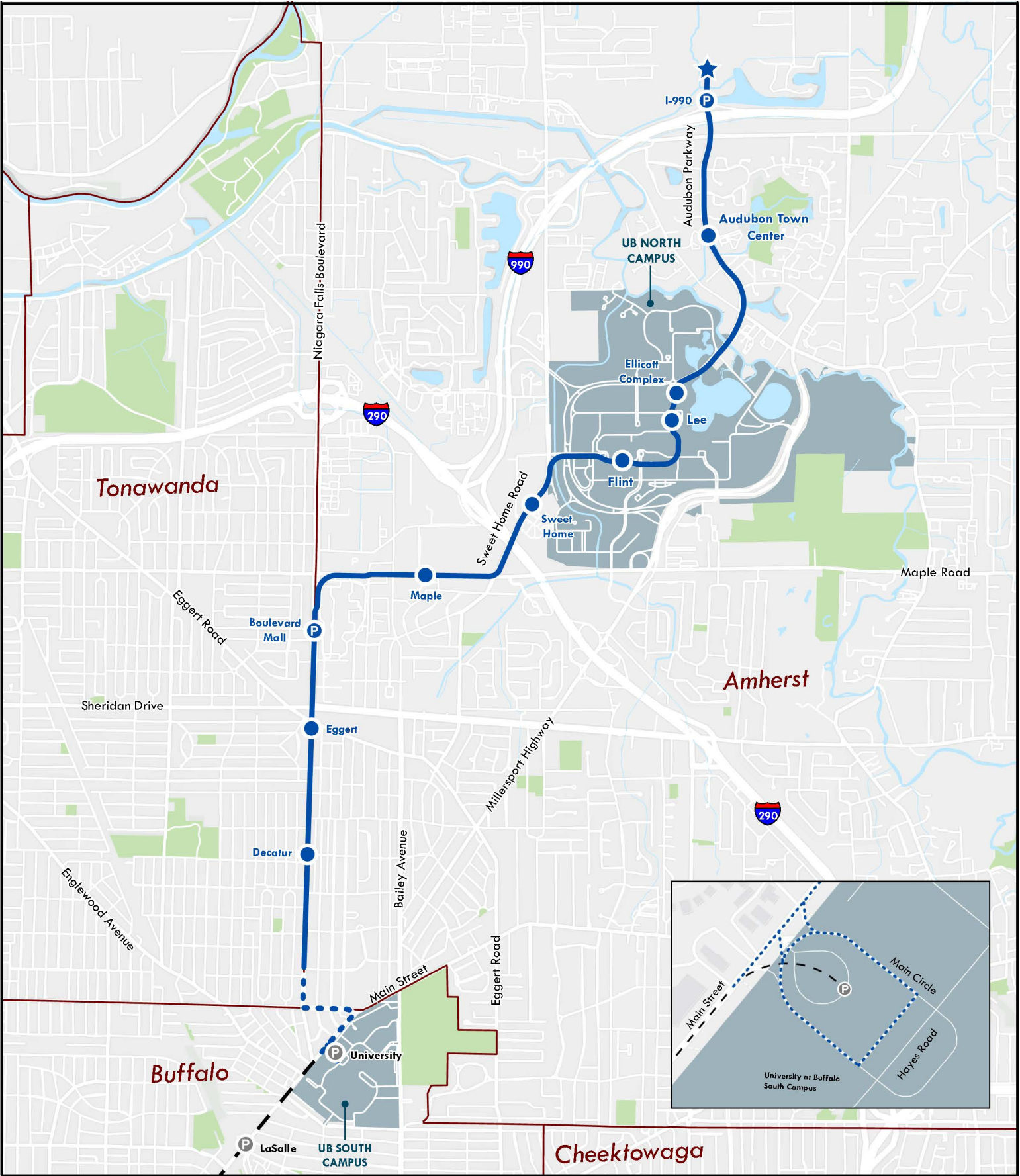


Figure 3. BRT Build Alternative



Buffalo-Amherst-Tonawanda Corridor Transit Expansion

- Dedicated busway
- Mixed-traffic
- Proposed Station
- ★ Proposed Storage/Light Maintenance Facility
- Ⓟ Proposed Station with Park & Ride
- Existing Metro Rail Line
- Ⓟ Existing Station with Park & Ride
- ▭ City and Town Boundary

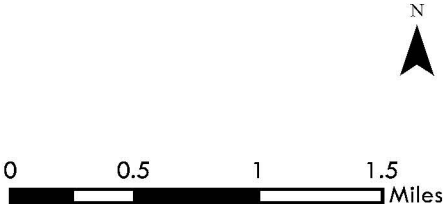
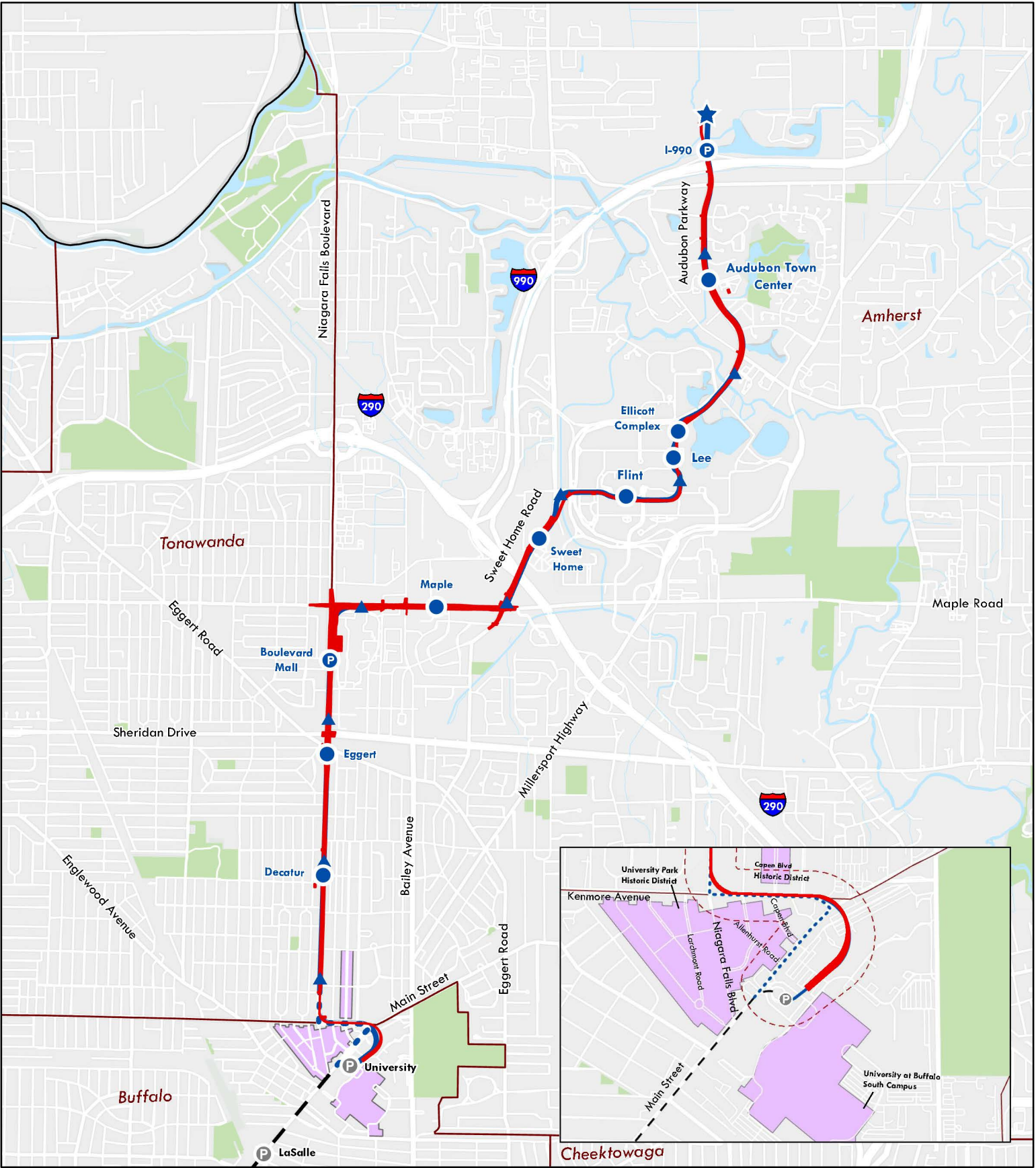
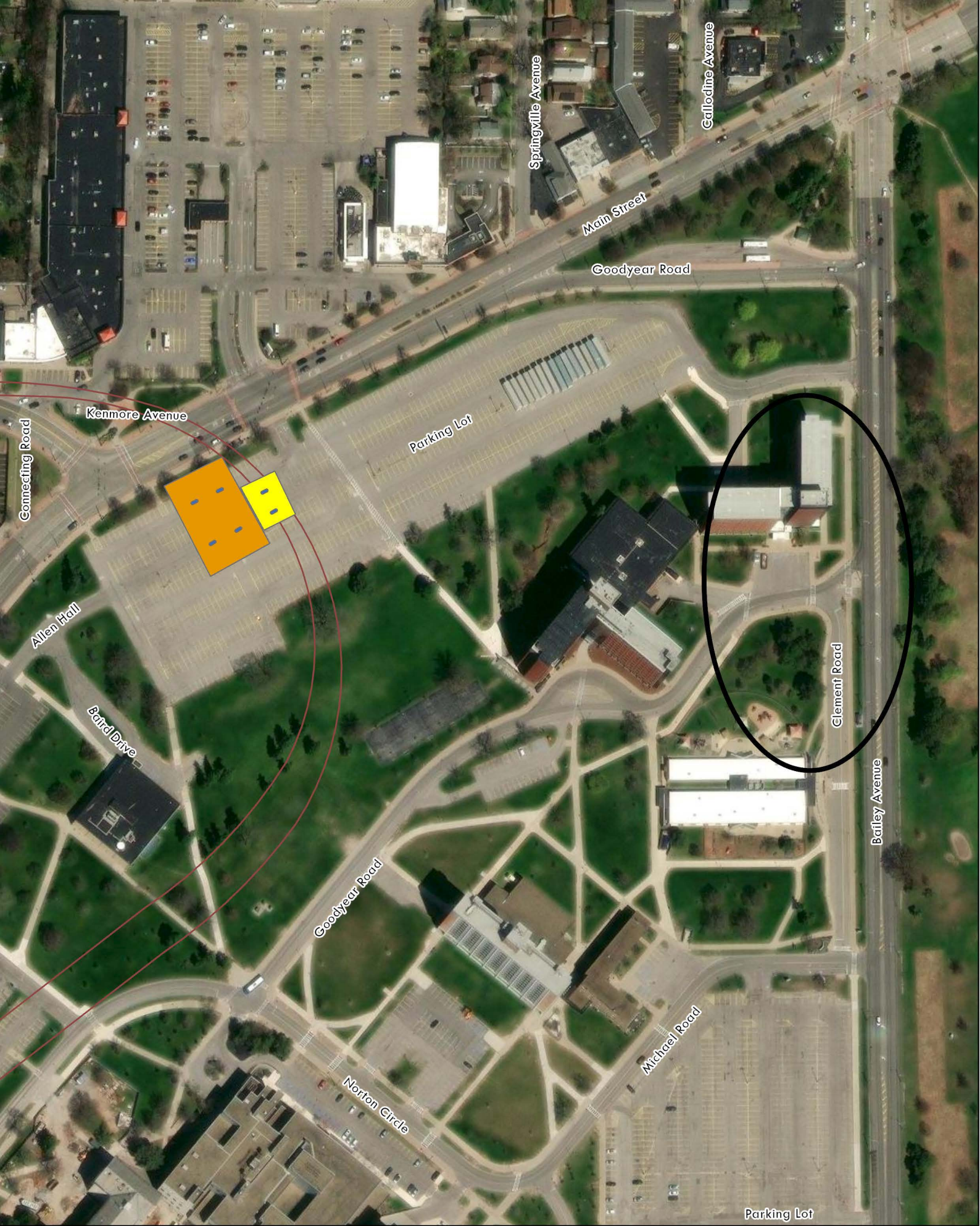


Figure 4. Area of Potential Effects



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Phase 1B Approximate Trench Locations

- Approximate Location of Potter's Field
- Staging Area
- Approximate Phase 1B Trench Location
- Shaft
- Proposed Tunnel



0 0.04
Miles