

# How to Comment on the BMT Draft Scope of Work

The Draft Scope of Work (DSOW) sets the boundaries for what the Environmental Impact Statement (EIS) will study. During scoping, our job as a community is to make sure the lead agencies studies, within or above the baseline methodologies:

- The right things: the traffic, air, and noise impacts that could affect nearby homes and schools;
- The right boundaries:
- The right range of alternatives, and
- The measures that could reduce harm.

In this stage, we're shaping the *questions* the EIS will answer.

Verbal Testimony	Written Testimony
<ul style="list-style-type: none"><li>• Three Minutes @ 03/16/26 Hearing</li><li>• Recorded &amp; transcribed for the record</li><li>• Don't need to be perfect, just clear, specific, respectful</li></ul>	<ul style="list-style-type: none"><li>• Allows you to go into greater detail</li><li>• Email to <a href="mailto:espokowski@moec.nyc.gov">espokowski@moec.nyc.gov</a></li><li>• Deadline is 03/31/26</li></ul>

## 1. Start with your name and affiliation (e.g., "I'm a resident of Cobble Hill")

## 2. Make clear what you are commenting on

For verbal testimony, you just want to be clear. Written comments should include more specific citations to the DSOW or CEQR Technical Manual

Example:

- Verbal: "In the Transportation section of the Draft Scope..."
- Written: "Under CEQR Chapter 16, the transportation study area should match the full area of expected traffic impacts"

## 3. Ask for Something Concrete

This is your opportunity to bring local knowledge into the process. Instead of saying: "This will be a traffic nightmare", identify specific intersections to study and explain why they should be included based on your lived experience.

## 4. Tie each request to a reason why it matters

End your comment with why your proposed change matters (e.g., safety, air quality, quality of life, etc.).

## Final Tip

You do not need to be technical to be effective. The strongest comments:

- Are specific
- Identify locations
- Request clear changes
- Connect impacts to real people

This is the moment to shape what gets studied. If it is not in the Scope, it may not be in the EIS.

# CHA Points of Inquiry

Below are some of the substantive issues CHA intends to raise in its written comments, and which we encourage you to help amplify. You do not need to cover all of these, and there are issues not included below that you may wish to address. Focus on what affects you and use examples from your lived experience.

**1. Cumulative Impacts Must Include LICH Development:** The former Long Island College Hospital site is projected to add hundreds of residential units. The FSOW should require the EIS to analyze the cumulative impacts from the LICH units on transportation, open space, school, sewer, construction, and public health. Why it matters: Infrastructure will be shared by both developments.

**2. Study Area Boundaries Are Too Narrow or Poorly Defined:** The DSOW sets different study areas for different topics. In several cases, the default boundaries may be too small for a project of this scale. The FSOW should:

- Expand the Urban Design study area from ¼ mile to ½ mile to include Atlantic Avenue and Cobble Hill Historic District (CEQR Chapter 10 § 310).
- Expand the air quality study area to ¼ mile to include P.S. 29 and nearby residences (CEQR Chapter 17 § 310) and the mobile-source analysis to include the entire transportation study area.
- Clarify that the transportation study area includes Hicks, Henry, and Clinton from Hamilton Avenue to Atlantic Avenue
- Expand transportation study to include Court Street based on post-Vision Plan traffic pattern changes from the Court Street re-design.
- Define the Indirect Business Displacement study area to include Atlantic Ave. between Columbia St. and Court St.

Why it matters: If the boundary is too small, real impacts will not be counted.

**3. BQE Conditions Must Be Realistically Modeled:** The DSOW assumes continued operation of the BQE in its current form, even though the City's own projections state it will be at reduced capacity by 2029. The EIS must: (1) Model reduced BQE capacity in 2038; (2) Analyze deterioration between 2029 and 2038; and (3) Study post-2038 conditions, just as flood risk is studied beyond the build year.

Why it matters: If the BQE cannot handle current traffic, adding thousands of new residents and more freight will have greater neighborhood impacts.

**4. Study Specific Intersections:** Under CEQR, the EIS must identify logical traffic routes and existing problem locations (CEQR Chapter 16, § 341). Among others, the studied intersections must include: Hicks Street & Atlantic Avenue; Henry Street & Kane Street; Henry Street & Atlantic Avenue; Clinton Street & Atlantic Avenue; Court Street & Atlantic Avenue. Why it matters: If known congestion and safety hotspots are excluded, the EIS will understate impacts.

**5. Analyze Closing the Atlantic Avenue BQE On-Ramp:** The EIS should evaluate: (1) Ramp closure as a build alternative; (2) Ramp closure as a mitigation measure. Why it matters: This ramp drives neighborhood cut-through traffic. Increased BMT traffic could intensify those effects.

**6. Water & Sewer Infrastructure:** The Vision Plan commits to completing an Amended Drainage Plan by the end of 2026, which is after the environmental review period. The FSOW must commit to incorporating all findings and required mitigations into the Final EIS. Why it matters: This commitment is critical to ensure that the DEIS accounts for downstream risks, local flooding, and potential infrastructure strain in surrounding communities.

**7. Construction Impacts Must Be Fully Studied:** Construction may last many years and affect surrounding streets. The FSOW must (1) Expand construction impact analysis to at least ½ mile and (2) Study truck routes, lane closures, sidewalk disruptions, parking loss, and overlapping construction with LICH or BQE repairs. Why it matters: Construction traffic and noise can significantly alter daily life for years.