

**April 9, 2026**  
**Analysis of Brownfield Cleanup Alternatives for**  
**Austin Commons**

**Introduction and Background**

The Redevelopment Authority of the City of Milwaukee (RACM) was selected to administer a United States Environmental Protection Agency (USEPA) Brownfields Cleanup Revolving Loan Fund (BCRLF). The first Cooperative Agreement was received in 2002, which provided \$1,000,000 in federal assistance over a five-year period. Additional Cooperative Agreements were received in 2003, 2004 (amended the 2003 agreement), 2005, 2006, 2007, 2008 (amended the 2007 agreement), 2009, 2011 (amended the 2009 agreement), 2012 (amended the 2009 agreement), 2013 (amended the 2009 agreement), 2014, 2023, 2024 (amended the 2023 agreement), and 2025 (amended the 2023 agreement) respectively for a total of \$17,350,000.

On April 16, 2026, a resolution will be introduced that will allow for RACM to provide up to a \$500,000 loan to Austin Commons, LLC for a 100-unit multi-family affordable housing development project from RACM's EPA BCRLF Program to support environmental remediation at the properties located at 2318, 2324, and 2332 South Austin Street, Milwaukee, Wisconsin.

The properties are currently owned by Bayview Lincoln Holdings, LLC. Austin Commons, LLC intends to purchase the property in the summer of 2026, demolish the existing buildings, remediate the property, and redevelop the site into a 100-unit affordable housing development.

Each of the three subject parcels were originally developed as single-family homes. The property at 2318 South Austin Street was constructed around 1928 and included a second structure close to the east property line, which was removed sometime between 1963 and 1995. The property at 2324 South Austin Street was constructed around 1930. The property at 2332 South Austin Street was constructed around 1960. All three structures are still existing at the site, however they are now boarded and unoccupied.

Environmental records indicate that the east adjacent property had a 1,500-gallon fuel oil UST that was closed and removed, however petroleum impacts may have impacted the subject site. Two geotechnical investigations from August 2025 and October 2025 documented the presence of anthropogenic fill materials and organic materials at the subject property. Fill materials contained soil, brick, wood, porcelain, and potential foundry fill and may have been placed at this location to facilitate construction of the houses. Phase II Environmental Site Assessment activities took place in 2025 – 2026 and identified VOC, metals, and PAH contamination in the subsurface soils and metals and PAHs in the groundwater.

Geotechnical investigation work was initiated in August 2025. Phase II Environmental Site Assessment begin in October 2025. The following reports are either completed or underway:

- Phase I Environmental Site Investigation – Completed March 17, 2025
- Development at Historic Fill Site Exemption Request – Completed February 10, 2026

- Materials Management Plan – Completed March 16, 2026
- Site Investigation Report – Underway
- Remedial Action Options Report – Underway

Based on the contaminant concentrations identified, the Wisconsin Department of Natural Resources (WDNR) was notified and an Environmental Repair Program (ERP) Site (BRRTS #02-41-598651) activity was opened. Kapur is currently preparing the site investigation report and remedial action options report on behalf of Austin Commons, LLC.

The following paragraphs summarize soil findings:

- Benzene was the only VOC detected in any soil samples and was only detected at two locations, both concentrations exceeded the WDNR NR 720 groundwater protection residual contaminant level (RCL).
- Lead and Arsenic appear to be the primary metals detected in soils at the site. Concentrations of these metals exceeded the WDNR NR 720 industrial direct contact RCL, however, the locations with these concentrations are below 4 feet.
- Barium, cadmium, selenium and mercury were detected in one or two of the samples at concentrations exceeding the WDNR NR 720 groundwater protection RCL. Cadmium was detected at one location at a concentration exceeding the WDNR NR 720 non-industrial direct contact RCL.
- Various PAH compounds have been detected in several soil samples and exceed the WDNR NR 720 groundwater protection and direct contact (both industrial and nonindustrial) RCLs.

The following paragraphs summarize groundwater findings:

- The fill material appears to be located throughout the Subject Property, with contamination mainly identified at depths of 5 feet below ground surface and deeper.
- VOCs (including benzene) were not detected in any of the groundwater samples.
- Lead in groundwater from MW-1 exceeded its WDNR NR 140 enforcement standard (ES) in the sample collected in October 2025, however, the lead concentration in MW-1 exceeded its WDNR NR 140 preventive action limit (PAL) but was below its ES. Lead was not detected in groundwater collected from the other monitoring wells.
- Arsenic was detected in groundwater from MW-1 and MW-2 at concentrations exceeding its PAL, but below the ES.
- The PAH compounds benzo(a)pyrene, benzo(b)fluoranthene and chrysene were detected in groundwater from MW-1 at concentrations exceeding its PAL, but all were below the ES.

### **Applicable Regulations and Cleanup Standards**

Notification of a release and assignment of BRRTS numbers by the Southeast Region of the Wisconsin Department of Natural Resources (WDNR) is complete, and therefore the site is subject to the requirements of Section 292.11 (3) Wisconsin Statutes (hazardous substances spill law) and Wisconsin Administrative Code chapters NR 700 through NR 749 (which establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure). The borrowers, in coordination with qualified consultants, will complete a

Site Investigation and Remedial Action Plan for the site in accordance with all applicable state statutes and WAC chapters. The Remedial Action Plan will be submitted to WDNR for comment and approval prior to cleanup and will form the basis for the cleanup activities.

Cleanup at the site will continue to be monitored by staff at the WDNR. Cleanup will be targeted to meet relevant industrial standards set forth in Wisconsin Administrative Code (WAC) chapter NR 720 (Soil Cleanup Standards) and WAC chapter NR 746 (Risk screening and closure criteria for petroleum product contaminated sites, and agency roles and responsibilities).

## **Evaluation of Cleanup Alternatives**

This section identifies various remediation alternatives that could be used to address the environmental contamination issues at the Austin Commons site. The “No Action Alternative” is used as the baseline against which the other alternatives are analyzed. It should be noted that environmental assessment work is still underway and remediation alternatives are discussed below in general terms.

The following broad categories of evaluation criteria were considered in assembling remediation alternatives at the site: effectiveness, implementability, cost, and impacts from potential extreme weather events.

### Alternative One – No Action / Monitored Natural Attenuation

The no-action response involves no remediation of residual impacted soil at the site. This response typically serves as a baseline against which the other remedial options and technologies can be compared. The no-action response may be used as the sole remedial action only in the event the prevailing site conditions lead to the determination that the site poses no significant risk to human health or the environment with no controls in place. In that event, implementation of other types of action becomes unnecessary.

1. Effectiveness – The no-action alternative would eventually reduce the magnitude of the existing risk for soil with residual VOC concentrations by natural attenuation processes but does not address the PAH or metals impacted soil. This alternative would not take action to protect public health, safety, and welfare and the environment.
2. Implementability – This alternative is implementable.
3. Cost – This alternative was considered the lowest in terms of present worth cost and disruption to the site. It has no associated capital costs or operation and maintenance costs, although indirect costs of the no action alternative will include a continued blighting influence on surrounding properties which would be manifested in lower property values and a decreased tax base.
4. Impacts from potential extreme weather events – The United States Global Change Research Program finds that the Midwest region will likely see future climate changes that include an overall increase in winter and summer temperatures, increasing numbers of hot days, and an increasing numbers of wet days. Climate change impacts to the No Action Alternative are expected to be minimal as the site is not near a coastline or in a floodplain.

### Alternative Two – Excavation and Off-Site Landfill Disposal

Additional excavation and off-site disposal of soil in the areas with residual impacts was evaluated as a possible remedial alternative. Under this alternative, all impacted soils would be excavated and disposed of at an area licensed landfill, followed by backfilling of the excavation to the planned grade with unimpacted soil or subbase aggregate. Under this alternative, neither capping nor registration on the WDNR's GIS database would be required.

1. Effectiveness – This alternative would be effective. However, the site contaminants would be simply moved to an off-site landfill, and the excavation and transportation of the impacted soil may present health and risks that may be greater than the risks posed by leaving the soil in place. In the short term, excavation and off-site transport of impacted soil would temporarily increase hazards to site workers and the public due to the necessary handling and transportation of these soils. In the long term, excavation and off-site disposal may somewhat reduce the magnitude of existing risk at the site by contaminant mass removal compared to no action.
2. Implementability – The implementability of this remedial alternative is low given the cost it would take to excavate, and then backfill, all impacted soils. The site also would experience extreme disruption.
3. Cost – The estimated capital costs are anticipated to be very high.
4. Impacts from potential extreme weather events – The United States Global Change Research Program finds that the Midwest region will likely see future climate changes that include an overall increase in winter and summer temperatures, increasing numbers of hot days, and an increasing numbers of wet days. Climate change impacts to the Excavation and Off-Site Landfill Disposal Alternative are expected to be minimal as the site is not near a coastline or in a floodplain.

#### Alternative Three – Limited Soil Excavation and Off-Site Disposal with Engineering and Institutional Controls

This alternative best fits the planned redevelopment of the site, which does require some soil excavation, but also includes site infrastructure that could be used as an environmental cap. Hot spot areas and areas where foundations would be installed would be excavated and disposed of in a licensed landfill, and backfilled to accommodate the new development footprint. Parking areas, building floor slabs, and sidewalks could all function as site caps, while landscaped areas would serve as barriers to any residual contamination below. The site would be listed on the WDNR database to notify the public of residual soil and groundwater impacts.

1. Effectiveness – This alternative would be effective at reducing the magnitude of the existing risk, while maintaining protection from direct contact exposures to site workers and the public.
2. Implementability – The implementability of this alternative is high. The use of engineered barriers and institutional controls in conjunction with the WDNR database for soil contamination is an existing proven mechanism, with no fewer disruptions to the Site and less unnecessary soil handling.
3. Cost – Compared to the complete excavation and offsite landfill disposal of impacted soil remediation alternative, the associated capital costs for this option are much lower than Alternative 2.
4. Impacts from potential extreme weather events – The United States Global Change Research Program finds that the Midwest region will likely see future climate changes that include an

overall increase in winter and summer temperatures, increasing numbers of hot days, and an increasing numbers of wet days. Climate change impacts to this alternative are expected to be minimal as the site is not near a coastline or in a floodplain.

### **Recommendation**

The Remedial Alternatives were evaluated based on their effectiveness, their feasibility of implementation, the costs of each alternative, and the impact of potential extreme weather events.. Based on the above evaluation, the selected final remedy is Alternative Three which uses limited excavation and off-site landfill disposal with institutional and engineering controls to address VOC, PAHs, and metals concentrations in soil and groundwater. As a whole, this alternative provides both the most efficient cleanup strategy and the best protection for human health and the environment.