



January 16, 2026 (revised 2/27/2026)

To Whom it May Concern

Sent by email only to: Megan Meisenbach at meganmeisenbach05@gmail.com

Subject: Environmental Evaluation of Former Jack Brown Cleaners Site
615 W. Martin Luther King, Jr. Blvd.; Austin, Texas

Dear Ms. Meisenbach:

As you requested, this letter report summarizes the results of my evaluation of environmental conditions and potential human health effects due to releases of dry cleaning chemicals from the former Jack Brown Cleaners (JBC) property (Site) located at 615 W. Martin Luther King, Jr. Blvd in Austin, Texas. I summarize background information regarding the Site history, presence of dry cleaning chemical contamination in soil and groundwater at the Site and at nearby properties, regulatory status with the Texas Commission on Environmental Quality (TCEQ), and environmental risks if the Site is redeveloped for commercial or residential use.

Summary and Conclusions

From my review of the JBC Site VCP documents, I draw the following conclusions:

- The Site soil and groundwater are contaminated with high concentrations of the dry cleaning chemical Tetrachloroethylene (PCE) and its degradation by-product chemicals, including Trichloroethylene (TCE) and Vinyl Chloride (VC). The chemicals are present at levels exceeding indoor air human health limits for vapor migration into current and future buildings. Further, TCE in groundwater has exceeded TCEQ limits for outdoor air exposures. It is notable that the U.S. Environmental Protection Agency is sufficiently concerned about TCE's toxicity (and that of PCE and VC) that the agency is phasing out nearly all uses of this chemical.
- It is my opinion that the Texas Commission on Environmental Quality (TCEQ) inappropriately approved JBC's request to cease Site cleanup and monitoring. The Voluntary Cleanup Program (VCP) Certificate of Completion granted to JBC means that they and future property owners have no further obligations to cleanup and protect on-site residents, visitors, and workers from cancer risks despite the potential that indoor and outdoor air quality could exceed human health safe limits.
- Regardless of TCEQ's previous actions, future development plans for the JBC property should address these potential human health risks that likely will remain for decades unless the Site is properly remediated or building measures incorporated to prevent migration of toxic chemical gases into the buildings. In addition, the property owner should prevent outdoor air exposures, especially to workers who could contact contaminated soil and groundwater and breathe toxic vapors.

Operational and Environmental History of the Site

Dry cleaning operations under various business names are reported to have begun in 1950 and continued for an unknown period but at least until 2003 when JBC enrolled the Site into the VCP. The dry-cleaning facilities used chemical solvents, including the known human carcinogen Tetrachloroethylene (PCE, perc). PCE can



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degrade and be transformed by bacteria into degradation by-products such as Trichloroethylene (TCE) and Vinyl Chloride (VC), which likewise are known to cause cancer from exposure to very low environmental concentrations in water, air, and skin contact.

PCE and associated chemicals were discovered at the Site in 2003 during an environmental assessment conducted by a possible purchaser of the property. JBC subsequently performed additional soil and groundwater investigations to define the horizontal extent of soil and groundwater contamination on their own property and on neighboring properties to the east and south. They claimed that chemical releases to the subsurface originated from chemical storage tanks in the Site basement. Their studies showed that soil and groundwater concentrations on-site exceeded TCEQ limits even under the relaxed standards for groundwater that was deemed to not be a potential source of drinking water (known as a Class 3 groundwater).

TCEQ did not require JBC to evaluate the potential that contaminant vapors could migrate from soil and underlying groundwater into indoor air within buildings present then or in the future. I believe this omission was an inappropriate oversight by TCEQ and that building indoor air vapor migration risks should have been assessed due to the highly toxic nature of PCE, TCE, and VC for human inhalation and because of the high concentrations in soil and groundwater. JBC's own vapor monitoring data from vent points in the basement showed very high vapor concentrations of over 900 parts per million. Further, groundwater lab data provide strong evidence that PCE is present in groundwater, not only dissolved in the water but also as a separate-phase PCE liquid. Consequently, it is my opinion that PCE will continue to dissolve into groundwater and volatilize (i.e., evaporate) vapors into subsurface air space for decades into the future. PCE, TCE, and VC groundwater concentrations at the Site have exceeded U.S. Environmental Protection Agency (EPA) Resident Vapor Intrusion Screening Levels (VISLs). TCE in groundwater also exceeded TCEQ limits for outdoor air exposure.

JBC removed the basement concrete floor and excavated contaminated soil and weathered limestone bedrock underneath, which they hauled off-site for disposal. Because contamination remained in the soil and bedrock following excavation, JBC installed a perforated pipe vapor venting system to remove contaminant vapors. A new basement concrete floor was installed over the vapor collection system.

They also collected and analyzed groundwater samples periodically from monitoring wells installed on-site and off-site. The groundwater lab data showed little reduction in concentrations over time, although transformation to degradation by-products is evident, including VC which is even more toxic than PCE.

TCEQ Site Status

JBC enrolled the Site into TCEQ's Voluntary Cleanup Program (VCP) as Site No. 1658. The VCP affords successor property owners with legal protections against TCEQ enforcement provided the Site is remediated or controlled to the TCEQ's satisfaction under relevant agency rules and guidance. In 2020, JBC reevaluated the groundwater classification from Class 3 to "non-groundwater bearing unit", which had the effect of allowing JBC to terminate all ongoing cleanup activities. As a result, JBC received a VCP Certificate of Completion (COC) from TCEQ indicating that no further action was required at the Site.



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I believe TCEQ should not have issued the Certificate without addressing the vapor indoor migration risk or the risk of outdoor air exposure, as described above.

Potential Effects on the Site if Redeveloped

If a property owner develops the Site for occupancy by residences or commercial buildings, it is my opinion that physical barriers and/or an air venting system beneath the foundation may be necessary to prevent toxic vapor migration into buildings and other enclosed breathing spaces.

Additionally, it is my opinion that TCEQ should have required JBC to apply land use controls to the property deed and a site management plan to prevent contamination exposure to on-site workers via contact with vapors in work spaces and contact with groundwater, such as in subsurface excavations (note that groundwater is very shallow at less than 2 feet deep at times). As indicated above, there may be an ongoing potential risk to human health at the Site from inhalation of TCE vapors in outdoor air, a risk that, in my opinion, has not been adequately addressed by JBC and TCEQ.

Brad Snow, P.E., P.G. Qualifications and Experience

My professional background consists of 43 years of environmental experience focused on investigation, human health and ecological risk assessment, and cleanup of industrial and commercial properties contaminated with a wide variety of chemicals throughout the U.S. and internationally. I am a licensed Professional Engineer and Professional Geologist in multiple states, including Texas. I earned B.S. and M.S. degrees in Geological Engineering from the Missouri University of Science & Technology.

If you have any questions about this letter, please do not hesitate to contact me at 512.705.0010 or brad@snowenv.com. Thank you.

Sincerely,

Snow Environmental Solutions, LLC

A handwritten signature in blue ink that reads "Brad L. Snow".

Brad L. Snow, P.E., P.G.
Senior Consultant and President



(Signed 1/16/2026)

Subject: SP-2026-0048C.CP for Back-up Environmental Evaluation of the Site
Date: Wednesday, March 4, 2026 at 12:22:25 PM Central Standard Time
From: Megan Meisenbach
To: Rousselin, Jorge

External Email - Exercise Caution

Now combined into one case labeled SP-2026-0048C.CP for the Planning Commission

This case was on the Austin City Council's Agenda and was called ([Items 77 C14-2025-0090](#) and [78 C14-2025-0093](#)) asking for upzoning to downtown mixed-use (DMU) of property that includes the site of Jack Brown Cleaners on Martin Luther King and Nueces. The current zoning of the Jack Brown Cleaners site is CS which allows buildings of 60 feet, the DMU zoning would allow 120 feet, but the applicant indicated that it will ask for more density bonuses from the council [to take the proposed zoning to 433 feet](#) of mixed use development. They propose [two towers, on 37 stories and the other 34 stories](#). That is 44% taller than the private Dobie dorm on the UT campus.

Besides concerns about the appropriateness of the proposed buildings' heights, there are environmental concerns. The site is located in the Shoal Creek Watershed of the Colorado River Basin. A [licensed professional engineer and professional geologist issued a January 2026 report](#) (pg4-6) with these conclusions, among others:

- “The Site soil and groundwater are contaminated with high concentrations of the dry cleaning chemical Tetrachloroethylene (PCE) and its degradation by-product chemicals, including Trichloroethylene (TCE) and Vinyl Chloride (VC). The chemicals are present at levels exceeding indoor air human health limits for vapor migration into current and future buildings...
- It is my opinion that the Texas Commission on Environmental Quality (TCEQ) inappropriately approved JBC's request to cease Site cleanup and monitoring. The Voluntary Cleanup Program (VCP) Certificate of Completion granted to JBC means that they and future property owners

have no further obligations to cleanup and protect on-site residents, visitors, and workers from cancer risks despite the potential that indoor and outdoor air quality could exceed human health safe limits.

- Regardless of TCEQ's previous actions, future development plans for the JBC property should address these potential human health risks that likely will remain for decades unless the Site is properly remediated or building measures incorporated to prevent migration of toxic chemical gases into the buildings...”

Accordingly, questions remain whether the site has been or will be appropriately remediated or development plans required to address any potential human health risks.

The planning commission denied the community’s request to postpone the case for additional environmental review, reasoning that any unresolved environmental contamination was unrelated to the grant of additional zoning entitlements to the developer. Under the city process, environmental contamination issues can be addressed during site plan review *after* the developer has been granted zoning for the project. ***However, there is no public notice, hearing, or community input available at this stage.***

[Write the Council](#) and ask them to postpone the zoning case as necessary to determine whether there is any “ongoing potential risk to human health” posed by the site before the zoning entitlements are granted, or minimally, to require staff to provide their findings and recommendations regarding environmental contamination and remediation to the Council and interested parties thirty days before any site plan approval, so that the community is afforded an opportunity for review and input.

Community Not Commodity

CAUTION: This is an EXTERNAL email. Please use caution when clicking links or opening attachments. If you believe this to be a malicious or phishing email, please report it using the "Report Message" button in Outlook. For any additional questions or concerns, contact CSIRT at "cybersecurity@austintexas.gov".

Subject: case # SP-2026-0048-C.CP

Date: Thursday, March 5, 2026 at 2:14:00 PM Central Standard Time

From: Jo Howard

To: Rousselin, Jorge

External Email - Exercise Caution

I am writing to express my concerns about the drastic neight and resulting incompatibility of this project.

I live in a State and City landmarked historic house 200' from the project. There are at least 8 other such properties near the project, several even closer than my own. I fear a 445' tall building will overwhelm and minimize the importance of some of Austin's most historic assets.

These proposed twin towers abut the historic Judges Hill District which was to be protected under the Downtown Austin Plan--a compromise reached after months of work by the City and the community. The vision was to decrease building heights as one moved further from downtown and closer to Judges Hill District. These twin towers will leap up out of nowhere to over 400', dwarfing everything around it, including the new courthouse, all buildings in UNO, and the beloved University of Texas Tower.

I ask you to reject this request.

Thank you,
Jo Sue Howard

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PUBLIC HEARING INFORMATION

This request will be reviewed and acted upon after public hearings before the Land Use Commission and the City Council. Although applicants and/or their agent(s) are expected to participate in a public hearing, you are not required to participate. This meeting will be conducted both online and in-person at which you will have the opportunity to speak FOR or AGAINST the proposed development or change. Contact the case manager for further information on how to participate in the public hearings. You may also contact a neighborhood or environmental organization that has expressed an interest in an application affecting your neighborhood.

Staff is conducting a pilot program to receive case-related comments online which can be accessed through this link or QR code: <https://bit.ly/ATXZoningComment>.



During its public hearing, the Planning Commission may grant or deny this request.

For additional information on the City of Austin's land development process, visit our website: www.austintexas.gov/planning.

Written comments must be submitted to the board or commission (or the contact person listed on the notice) before the public hearing. Your comments should include the board or commission's name, the scheduled date of the public hearing, and the Case Number and the contact person listed on the notice. Correspondence and information submitted to the City of Austin are subject to the Texas Public Information Act (Chapter 552) and will be published online.

Case Number: SP-2026-0048C.CP
Contact: Jorge E. Rousselin, 512-974-2975
Public Hearing: March 10, 2026, Planning Commission
March 26, 2026, City Council

Scott Sayers

Your Name (please print)

1800 Nueces St.

Your address(es) affected by this application (optional)

Scott Sayers

Signature

3-4-2026

Date

Daytime Telephone (Optional): 512-917-7070

Comments: THIS MAKES SENSE FOR NEIGHBORHOOD DEVELOPMENT. THE PROPERTIES ARE NOT IN THE CAPITOL VIEW CORRIDOR AND NOT HISTORIC IN ANY WAY. THE BOARD OF DIRECTORS OF THE WEST DOWNTOWN ALLIANCE SUPPORTS THIS APPLICATION 100%.

I am in favor
 I object

If you use this form to comment, it may be returned to:

Austin Planning

Jorge E. Rousselin

P. O. Box 1088, Austin, TX 78767

Or email to: jorge.rousselin@austintexas.gov

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Case Number: SP-2026-0048C.CP
Contact: Jorge E. Rousselin, 512-974-2975
Public Hearing: March 10, 2026, Planning Commission
March 26, 2026, City Council

Julie Sayers, Ben Caenshaw, Bill Coore
Your Name (please print)

I am in favor
 I object

1800 Nueces St. (OWNER + TENANTS)
Your address(es) affected by this application (optional)

Julie Sayers, Ben Caenshaw, Bill Coore 3-6-26
Signature Date

Daytime Telephone (Optional): 512-474-3483

Comments: This area (block) requesting density bonus is appropriate for approval - height is not an issue since block is not in the Capitol view corridor and West Campus across MLK has very high buildings and allowances. The block is also not historic in any way. Old commercial structures, apartments in disrepair and one old bungalow house with no architectural integrity —

If you use this form to comment, it may be returned to:

Austin Planning

Jorge E. Rousselin

P. O. Box 1088, Austin, TX 78767

Or email to: jorge.rousselin@austintexas.gov

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Case Number: SP-2026-0048C.CP
Contact: Jorge E. Rousselin, 512-974-2975
Public Hearing: March 10, 2026, Planning Commission
March 26, 2026, City Council

Julia A Clark

Your Name (please print)

I am in favor
 I object

1700 West Avenue

Your address(es) affected by this application (optional)

Julia A Clark 3-4-26

Signature

Date

Daytime Telephone (Optional): 512-684-8410

Comments: I am in favor of redevelopment of this property but strongly object to the change in height restrictions. This property is adjacent to a historic neighborhood & would have a negative impact on it. I would like to see the current height restriction of 120' remain in place.

If you use this form to comment, it may be returned to:
Austin Planning
Jorge E. Rousselin
P. O. Box 1088, Austin, TX 78767
Or email to: jorge.rousselin@austintexas.gov

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Case Number: SP-2026-0048C.CP
Contact: Jorge E. Rousselin, 512-974-2975
Public Hearing: March 10, 2026, Planning Commission
March 26, 2026, City Council

James Montgomery
Your Name (please print)

I am in favor
 I object

Your address(es) affected by this application (optional)

James E. Montgomery 03/04/26
Signature Date

Daytime Telephone (Optional): 512 413 6283

Comments: While I support the redevelopment of this property, I think it should be done in accordance with current zoning regulations. To jump from 120' height to 445' would dwarf all surrounding properties. There's a reason for the step-down heights near family neighborhoods.

If you use this form to comment, it may be returned to:

Austin Planning

Jorge E. Rousselin

P. O. Box 1088, Austin, TX 78767

Or email to: jorge.rousselin@austintexas.gov