

MEMORANDUM

TO: Government Operations and Audit Committee (GOAC)

FROM: Christine A. Keaton, Independent Community Advocate & Disaster Relief Chaplain

DATE: July 17, 2026

RE: STANDALONE REPORT: Empirical Evidence of Hydrological Failure and Institutional Risk to the Lincoln High School–26th Street Basin

1. Purpose of this Submission
2. This report provides a ground-truth assessment of the I-229 project's impact on the basin defined by 26th Street (north), Cliff Avenue (east), and Crestwood Road (west). Lincoln High School sits at the lowest elevation point within this basin, making it the primary collection point for all redirected runoff. This report establishes that the current project design creates an unacceptable safety risk to the students and residents of this area.
3. The "Catcher" Effect: Lincoln High School at Risk
4. Topographic Reality: Lincoln High School is the lowest point in this basin. By engineering design and natural topography, it is the destination for all water that the State's new highway system fails to move.
5. The Highway as a "Hydrological Dam": By elevating the interstate and installing impermeable MSE walls between this basin and the Big Sioux River, the State has constructed a barrier that prevents natural drainage. Instead of reaching the river, water is now trapped and funneled directly toward the school's foundation.
6. The School as a "Catcher": The State has effectively engineered the Lincoln High School campus to act as the involuntary "catcher" for the drainage failures of the entire neighborhood.

2026. During a severe storm (including tornado alerts and heavy rain), the pressure was so extreme that two manhole covers were displaced within this basin.

9. Stagnant Risk: Photographic evidence confirms stagnant water accumulation in the project's containment berms during clear, dry weather. These structures are not mitigation; they are storage tanks for unmanaged runoff sitting adjacent to the lowest point of the school grounds.
10. Countering Claims of "Improvement"
11. Surface vs. Subsurface: The city is performing surface-level "improvements" (new asphalt and curbs) while failing to integrate or address critical infrastructure data captured in municipal CCTV logs from 2024. These aesthetic upgrades do not resolve the systemic failure occurring beneath the pavement; they mask it.
12. The "Salami Slicing" Strategy: The State is utilizing a "salami slicing" technique—sequencing the I-229 expansion with upcoming 2027/2028 MSE wall projects—to ensure that the cumulative impact of these structures is never assessed as a single, dangerous project.
13. Demand for Oversight
14. Independent Study: We reject the City, State's , and FHWA's self-serving modelings: We are requesting an independent, neutral hydrological study, free from city,
15. state or federal financial ties, that specifically models Lincoln High School as the lowest-elevation "catcher" for this basin.

16. Halt Construction: We request a moratorium on all future project phases, including the 2027 and 2028 MSE wall installations, until a ground-truth assessment confirms that the school site will not be subjected to increased inundation.

17. Closing Statement: Our Moral Imperative

18. The State focuses on engineering specifications—what they intended to do. I am focusing on the physical reality that Lincoln High School has been forced to act as the "catcher" for this highway's drainage. Water does not care about construction timelines; it only follows gravity.

19. But this is more than just water and concrete. These students are our children, and we are their last resort as guardians. By allowing this project to move forward without a proper, independent study, the State is knowingly placing our students in a high-risk zone. We are the last line of defense for these children, and we are asking this Committee to stand with us. We demand accountability, transparency, and a study that finally puts the safety of our students above the convenience of a highway design.

Lincoln High School is not just near a construction site; it sits at the bottom of a "fish bowl" that is historically known to have severe flooding issues. The State is fully aware of this geography. Yet, they are now raising the elevation of the interstate and installing massive, impermeable MSE walls throughout this basin.

This is not an "improvement"—it is a deliberate re-engineering of the landscape that blocks the natural path of water and forces that runoff directly against the Lincoln High School campus.

This design acts as a man-made barrier that protects the highway by using the school grounds as a storage tank for floodwaters. We must be clear about what this is: it is a premeditated act. The State has chosen to mitigate flooding for the interstate by knowingly causing pronounced, preventable damage to the school and endangering the students who learn there.

To prioritize the safety of a highway over the safety of our children—in a known flood zone—is an indefensible breach of the public trust

Respectfully,

Christine A. Keaton

Independent Community Advocate & Disaster Relief Chaplain

