

THE BIG LIE

The story of Platte to Park Hill, and I-70

Many residents saw the destruction of historic **City Park Golf Course (CPGC)** over last summer where hundreds of old trees were unceremoniously cut down, giant mounds of dirt rose up everywhere like ugly waves, and fine brown dust covered all the surrounding homes. Most knew it was due to the stormwater detention being dug into the west side as part of the costly **Platte to Park Hill (P2PH)** project, even as the City called it the “City Park Golf Course Redesign”, as if playability was the main issue and not giant detention. But always the larger deception was to claim P2PH would “..mitigate flooding in NE Denver.” Several City documents actually show P2PH’s main function was to protect I-70’s lowering, as well as large nearby developments, while community concerns upstream were secondary. But unfailingly, the City continued calling P2PH’s relationship to I-70 as “Separate”, “Independent”, “Complementary”, “Secondary”, “Redundant”, and (my favorite) “Aligned”. All garbage throwaway terms used for political cover. We simply can’t expect the City to ever acknowledge the actual connection. But we can. Hundreds of our century old trees are now gone, replaced by smaller fast-growing ornamentals creating a sorry shadow of what was taken. Worse yet, our City manipulated facts, presentations, and citizens to create this hard sell disgrace in the first place, telling everyone it’s “necessary for your protection” while throwing out misleading concepts and outright lies like Mardi Gras beads to the masses. And always we should remember the real endgame was to support the lowering of a major highway into a Superfund site, in a flood-plain, in some of the poorest neighborhoods in the City, to further developer interests while completely ignoring the actual health and well-being of our fellow citizens who lived there. What now follows is a more complete record of the facts and timeline than was on THE BIG LIE (condensed version). And these events that led to this sorry state can’t really be explained without all the players present. So here now, the important acronyms:

- CCD**- City and County of Denver (the City, the Mayor and his Administration)
- CDOT**- Colorado Department of Transportation
- CORA**- Colorado Open Records Act (access to State, County, City and Local Gov’t records)
- CPGC**- City Park Golf Course (Detention, part of **P2PH**)
- DZC**- Denver Zoning Code
- EADP**- Early Action Drainage Project (Early Action part of **TBDP**, later called **GLO**)
- EIS** (or **DEIS**)- Environmental Impact Statement (or Draft **EIS**)
- FOIA**- Freedom of Information Act (access to Federal Gov’t records)
- GES**- Globeville, Elyria, and Swansea (neighborhoods most affected by I-70 project)
- GLO**- Globeville Landing Outfall (part of **P2PH**)
- IGA**- Intergovernmental Agreement (between **CDOT** and **CCD** and using the **TBDP**)
- LOR**- Letter of Recommendation (**MATT LOR**)
- MATT**- Multi-Agency Technical Team (formed by **CDOT**, **RTD**, **CCD**, and **UDFCD**)
- MOU**- Memorandum of Understanding (**MATT MOU**)
- NDCC**- North Denver Cornerstone Collaborative (6 Portfolio Developments combined by Mayor)
- NEPA**- National Environmental Policy Act (under the EPA)

NWC (or **NWCC**)- National Western Center (Campus) (part of the **NDCC**)

P2PH (or **P2P**)- Platte to Park Hill: Stormwater Systems (4 Drainage Projects for a 100-year storm)

P3's- Public Private Partnerships

PCL- Partial Cover Lowered (I-70 PCL, lowered portion of the Central 70 project, part of the **NDCC**)

PHGC- Park Hill Golf Course (Detention, part of **P2PH**)

RiNo- River North (Art District in Five Points neighborhood, part of the **NDCC**)

RTD- Regional Transportation District ("**TOD**" Commuter Rail Lines and Stations, part of the **NDCC**)

TBDP- Two Basins Drainage Project (Lower Montclair/Park Hill Basin Storm Projects, precursor to **P2PH**)

TOD- Transit Oriented Development

UDFCD- Urban Drainage and Flood Control District

* - The most Important City Documents below showing connection between **P2PH** and **I-70**

A quick background: Montclair Basin is the largest basin (watershed) in Denver without a natural open waterway. It was essentially built over during the last 120 years of development but surface water still follows the same basic course and can overload old storm drains and flood several areas in heavy rains. Lower Montclair Basin includes City Park and the communities of Skyland, Whittier, Clayton, Cole, Elyria and Swansea. The last two are at the bottom of the basin near the Platte River which drains the basin. Though it's been known for decades that Elyria and Swansea can have flooding issues, there's never been a stated desire or plan to give them 100-year (1% chance of occurring each year) flood protection. Indeed, basic "Level of Service" by the City and County of Denver (**CCD**) is far lower. Park Hill Basin directly east is another watershed built over during the last century and also has flooding issues in heavy rains. It drains into the Platte next to Montclair Basin, mostly via Sand Creek. Both of these became part of a "Two Basins" plan to provide 100-year protection to parts of their lower basins near I-70. Several large developments desired by the City also lie here, particularly in lower Montclair Basin near I-70 and Brighton Blvd.

A timeline: Long before P2PH was on the drawing boards, events set the stage for its arrival. Back in 2008, the Colorado Department of Transportation (**CDOT**) actually rejected lowering I-70 to replace the viaduct because of "...unacceptable effects.. contaminated groundwater or soils.. cannot be built as a matter of sound engineering.." (from CDOT's 2008 **DEIS**). But in 2011, Gov. Hickenlooper and Mayor Hancock began exploring, then pushing for **Winter Olympics** in Denver. When 2022 ceased being an option, they pushed for 2026, 2030, etc., and still are. Infrastructure, facilities, and transportation were major areas of concern to be competitive and in 2012, Hickenlooper revived the lowered I-70 plan. Then in 2013, Mayor Hancock formed the **North Denver Cornerstone Collaborative (NDCC)** to align six "portfolio developments" highly desired by the City and developers including the same lowered **I-70 (PCL- Partial Cover Lowered project)**, National Western Center (**NWC** + Olympic Village?), River North (**RiNo**) & Brighton Blvd developments, and Regional Transportation District (**RTD**) Commuter Rail Lines and Stations (called Transit Oriented Development or "**TOD**"). All lie mainly in Montclair Basin's "bottomlands" near I-70 and Brighton Blvd, or what the Mayor calls the "**gateway to downtown**" and all lie along his "**Corridor of Opportunity**" from downtown to DIA. These two events- Winter Olympics' hopes and the NDCC, really set the stage for needing large scale 100-year flood protection right in this area. The timeline now continues..

Oct 2013- A working group known as **MATT** (Multi-Agency Technical Team) forms by Memorandum of Understanding (MOU) between **CDOT, RTD, CCD, & UDFCD** (Urban Drainage and Flood Control District). Its goal is to develop “..a coordinated set of infrastructure improvements that ..integrates the drainage needs of the following projects: 1. CDOT’s I-70; 2. RTD’s North Metro; 3. the NDCC.” It’s a little redundant since they’re all a part of the **NDCC**. Note that neighborhood drainage concerns aren’t mentioned. MATT was formed to re-examine the hydrology of the Montclair Basin “to provide C-DOT with a mutually agreed upon off-site 100-year design flow rate for the I-70 PCL project.” You have here the stated goal of integrating the drainage needs of a CO highway project (CDOT’s I-70 PCL) with large City developments (the NDCC) in the same area of Montclair Basin. It’s after MATT forms that City documents begin showing a desire to build a large drainage project to protect I-70, with additional protection for much of the NDCC.

*Jun 2014- A document called the “**Montclair Creek Drainage Feasibility Evaluation**” is created by **CCD** (partnered with **CDOT, UDFCD, NDCC** and others). The City refuses to release it until they are forced to by the later CPGC Lawsuit. It says CDOT should use CCD’s **Open Channel** design vs. CDOT’s pipes-only design to protect I-70: “In an effort to minimize flood risks, ..and **leverage funding from CDOT**, CCD has investigated alternatives to the 100-year pipe system CDOT is proposing which includes an open channel option.” It notes CDOT’s design “..provides no additional benefits other than protection of the PCL..” It’s the first time “leveraging funding from CDOT” is a stated goal, and that an Open Channel is proposed. It also wants CDOT’s pipes to empty into the City’s outfall near the Coliseum which later becomes the giant Globeville Landing Outfall (**GLO**). All of this shows an early desire to get I-70 into the City’s drainage plan. After evaluating several options, the one best meeting all the goals isn’t chosen. “Due to the schedule constraints in order to leverage funding from CDOT..”, they have to choose the next best. This lays waste any notion the City’s plans were “separate” and “independent” from I-70. They had to meet CDOT’s schedule and needs to leverage funding and so neighborhood concerns were never the driver. It also notes the proposed plan “..would offer at least the 100-year storm event protection for up to 400 acres ..which includes a portion of the NDCC area and all of the NWC Master Plan study area.” Much of the **NDCC** benefits as well. This is a common theme going forward. Elyria and Swansea also benefit from flood protection because they’re adjacent to I-70, but there’s no mention of any benefit south of 39th Ave (upstream) where 90% of the rest of the basin lies. CDOT is also infamously quoted as saying they can’t include an Open Channel design because they’d have to restart their Environmental Impact Study (**NEPA EIS**) and they were two years into it. This becomes the root of later lawsuits as CDOT is still using the City’s Open Channel and GLO anyway, just without a proper EIS. CDOT also gives a clue why they like Public Private Partnerships (**P3’s**) so much because non-Federal funding doesn’t require the (more stringent) NEPA process. Unfortunately for communities, it makes oversight of environmental issues more hidden.

Sep 2014- The **Denver Storm Drainage Master Plan** is issued (updated every 5 years). It’s the blueprint “..to identify and alleviate present and future drainage problems of the city.” It identifies \$1.5B in needed citywide upgrades. Doesn’t mention any need for an Open Channel, GLO, or 100-year protection for Montclair Basin. The City’s “level of service” handles 2-year events for residential and 5-year for commercial. Higher flows are then carried in gutters and streets. In several places the Master Plan highlights that **creating a 100-year plan is difficult and expensive** and not the norm for older established neighborhoods. It further states “..a phased program is recommended that prioritizes improvements to

address current hazards while improving the minor storm system.” Improving the minor system wouldn’t include such a huge 100-year project like P2PH unless something required 100-year protection, like a highway. It also states “The plan needs to establish a rationale for appropriation of funds based upon current level of service drainage criteria.” Many question the rationale of so many funds used to create a 100-year system (well above the “current level of service” criteria) that protects a relatively small area with that level of protection (i.e.- primarily only the highway and NDCC area).

*Jan 2015- The **MATT LOR** (Letter of Recommendation) comes out after months of studies and meetings. It describes the recommended technical solution for I-70 (to handle the 100-year flows from Montclair and Park Hill Basins) is a “**Combined Drainage System**”. For Montclair Basin it’s the City’s Open Channel (along 39th Ave), Outfall in Globeville, and Detention Ponds first seen in the Montclair Creek Feasibility Evaluation seven months earlier. They still provide the majority of protection for I-70. It adds CDOT’s pipes along the south side of I-70. Park Hill Basin next door adds Ponds/Pipes as well, creating the whole “Two Basins” concept and hints that it will need Detention in Park Hill Golf Course (**PHGC**). Concerning CDOT’s pipes, it notes: “This second system will handle the runoff from the local tributary area between 40th Avenue/Smith Road and I-70.” In other words, CDOT’s only responsibility for their own drainage will be to handle the flows between the nearby Open Channel and I-70. The City’s plan handles everything else. Some of the benefits include: “A more robust drainage system for I-70.”; “Increased drainage protection (100 year) for the North Metro Corridor, EAGLE (*P3 with RTD*) and NWC”; “Potential cost savings to the North Metro Corridor and NWC depending on timing of the Combined Drainage Solution”. This clearly shows that well before any P2PH presentations to our neighborhoods, the plan was solidifying for the City to handle most of the storm flows coming from the south towards I-70 and provide 100-year protection to the PCL, NWC, and RTD North Metro (all part of the **NDCC**). In other words, basically everything north of what would become the mile long 39th Ave Open Channel paralleling I-70. And tax dollars would pay for most of it instead of having these developments pay for it themselves via their P3’s.

Mar 2015- The **NWC** (National Western Center) **Master Plan**. Transforms the National Western Complex and Coliseum into a year-round destination, the National Western Center (or National Western Center Campus- **NWCC**). Partly funded by the voter-approved Ballot Measure 2C in Nov 2015, it benefits greatly from **P2PH**. The **39th Ave Channel** and **GLO** handle the majority of NWC’s drainage issues and they simply need to tie in, receiving 100-year flood protection courtesy of the taxpayer while their P3’s pay nothing (even as the voter-approved plan said there’d be no new taxes on residents). It’s here that **Olympic aspirations** really start showing: New Arena has “Ice capability for hockey, family shows and a possible Winter Olympics bid feasibility” and the New Trade Show/Exhibition Hall can “..accommodate the clear-span space for an Olympic long track speed skating oval.” The new NWC would have the capacity to be an Olympic Village with athlete housing nearby, as well as being a transportation hub connecting spectators to the mountain venues along I-70. It was these types of aspirations that caused the NWC to be one of the early drivers for lowering I-70, and both the **NWC** and **I-70** were rolled into the **NDCC** shortly after.

Jun 2015- **Floods!** Strong rains hit across the Denver area causing flooding in many places. Worst parts in Park Hill are north of MLK and south along 16th Ave and Colfax. However, claims that Park Hill was hit harder than other areas of the city is false in many cases but was used as further justification for the IGA.

*Jul 2015- The **IGA** (Intergovernmental Agreement) between **CDOT & CCD** contractually cements their relationship and clarifies the absolute reliance of I-70 PCL on P2PH. Passed by a Lame Duck Council using recent Park Hill flooding as further justification, it has all the parts in the MATT LOR but gets renamed the Two Basins Drainage Project (**TBDP**), which shortly becomes **P2PH**. The bottom line is that *TBDP provides the 100-year protection required by I-70 PCL*- “The City agrees to design the TBDP to handle 100-year storm protection, as defined in the (*MATT LOR*) dated January 2015, for the partially covered portion of the I-70 East Project..” Other highlights include: *payments from CDOT to help pay for TBDP*- “The State believes the TBDP will result in significant benefits for the I-70 East Project.. As a result, ..CDOT.. will pay 40% of the cost of the TBDP..”; *payments from CCD (and taxpayers) to help pay for I-70 PCL*- “..the City agrees to provide \$37 million (*net present value*) of funding to the State ..in equal annual installments of \$2,688,010 for 30 years (*\$80,640,300 total!*) to be used by the State in making availability payments to the Developer.”; *restrictions against CCD building anything less than 100-year protection*- “..The City further agrees not to permit any modifications of the TBDP that would adversely impact the ability of TBDP to convey, carry or ..mitigate the 100-year design flow required for this area.”; *penalizes CCD (and taxpayers) if the TBDP isn't completed to meet CDOT's I-70 schedule*- “The City acknowledges that the State is relying on this schedule as it structures the contract for the I-70 East Project.. Therefore, the City will include a.. provision in the contract ..that provides for \$5,000 per day of liquidated damages in the event that the TBDP is not operational by September 1, 2019.” (the **EADP** or Early Action portion of TBDP that becomes the **GLO** has the same penalties except its first section must be operational by December 1, 2017); and *coordination between CCD and CDOT on both projects*- “There shall be weekly status meetings with the Project Contractor in the field, which shall be attended by the Denver and the CDOT.. Project Manager.” and “It is the intent of the Parties that there will be ongoing, interactive consultation with regard to the both the EADP/TBDP and the I-70 East Project.” Nothing here is “Complementary”, “Secondary” or “Redundant”. In fact, TBDP becomes *ESSENTIAL* to I-70 PCL. And the only thing “Aligned” about both is that the City and CDOT “Aligned” their desires, funded each other, and pretended each project was independent, while using Denver taxpayers to fund the majority of their respective flood protection needs.

Sep 2015- TBDP is rebranded **Platte to Park Hill (P2PH)** three months after floods hit across Denver and Park Hill. A misleading name, it refers to Park Hill Basin and not the neighborhood. Even then it should've been “Platte to Montclair” since most of it lies in that basin, handling flows well downstream of Park Hill neighborhood. After citizens begin pressing the P2PH/I-70 connection at public presentations, the City throws out all the buzzwords mentioned above and then cynically adds that it's “smart government” and “wise use of taxpayer dollars”.

Apr 2016- **CPGC Detention** is added by City Council as the 4th piece of P2PH (39th Ave Open Channel, GLO, PHGC Detention, and CPGC Detention). CPGC is selected over Cole neighborhood which would destroy homes. It becomes a false choice (presented as only 2 options) and is finally a ruse to make CPGC more palatable. Some portray the protesters as choosing trees over homes (tree huggers vs. families) which is propaganda. Protests stem from the claim that P2PH is for our protection when so much shows this is a distortion, and neighborhoods are secondary to NDCC projects including I-70. City models show little additional protection from CPGC Detention for Whittier and Cole during heavy storms. Its main

purpose is to slow the flows from storms to the 39th Ave Open Channel. Besides cutting down hundreds of old trees, the City essentially destroys a Tom Bendelow course (called the “Johnny Appleseed of American golf”), inspired by Frederick Law Olmsted’s naturalist approach and one of only two that Bendelow designed on the National Register of Historic Places (NRHP). Part of the ongoing greenwashing on P2PH’s Dengov.org website is calling CPGC the “City Park Golf Course Redesign”, as if playability is the main issue vs. using it as major Detention for P2PH. And 39th Ave Open Channel is now called a “Greenway”.

Jun 2016- City Council votes (8-3) to raise **Stormwater Rates** \$383M, rubberstamping the Mayor’s desires. Over half (\$206M) goes to fund P2PH to provide 100-year flood protection to a relatively small area of total Denver. It limits the ability of the City to raise future funds for the 1.5 billion in needed citywide upgrades. P2PH’s total cost is \$267-\$298M. Perhaps not surprisingly, the 2018 storm fee mailings remove the cost breakdown of P2PH that were on the 2017 mailings.

Apr, Oct 2017- The Executive Committee of the **Denver Dems** produces Resolutions against P2PH (Apr) and I-70 (Oct). They want the Stormwater Rate increase used for the \$1.5B in needed citywide projects instead of P2PH, and the I-270/76 reroute option more seriously considered vs. I-70 PCL because of the social, environmental, and health concerns in Globeville, Elyria, and Swansea (**GES**) neighborhoods, the ones most impacted by I-70.

Oct 2017- Judge David Goldberg rules against the **CPGC Complaint**, allowing CPGC Detention to proceed. The 4-day trial in August was filed by former Colorado Attorney General J.D. MacFarlane in 2016, with Plaintiff’s Attorney Aaron Goldhamer acting pro bono for him and seven others. The Judge acted as Arbiter (vs. a Jury) and had a narrow scope to determine if Detention violated Denver Zoning Code (**DZC**), City Charter, or Common Law. Background: City Council put Parks and Recreation under the Mayor in the 2010 rewrite of DZC. This made the Manager of Parks (currently “Happy” Haynes) a political appointee of the Mayor not beholden to the citizens or Council. This individual has sole authority to determine what constitutes a “park purpose”. The Judge felt he had to give her leeway under this new code. She testified that stormwater detention is a park purpose but helping the I-70 project is not a park purpose. A convenient circumvention since there are multiple connections between P2PH and I-70 and she basically confirmed CPGC Detention (as part of P2PH and therefore I-70) is NOT a park purpose. In spite of his Ruling, the Judge writes “Though the reconfiguration of CPGC may be *a thinly veiled subterfuge* to pave the way for new construction plans on I-70 ..consideration of the various rationales and funding.. is beyond the scope of this Court’s charge..” An interesting statement considering he didn’t have to make it. It’s now in the public record. It’s also unfortunate that the issue of the City deceiving the public about the real purpose of P2PH (and therefore CPGC Detention) wasn’t what was really being tried here and was therefore “..beyond the scope of this Court’s charge..”, but perhaps the judge was acknowledging he saw it anyway. DZC’s rewrite took accountability and oversight of Parks away from citizens. Returning it to City Council and away from the Mayor’s open season on our open spaces will likely require new elected officials.

NOW: The City says **P2PH** lays the foundation for future upstream neighborhood improvements, including Park Hill. This implies it's not doing much right now for the majority of residents in these basins. It's kind of a big "*TRUST US!!*" from the folks who've been distorting P2PH's main purpose since the beginning. (Note- recent drainage work on Albion St/16th Ave and Dahlia St/38th Ave is funded by the rate increase but not P2PH portion and it's unclear if future funding exists to tie it into anything meaningful for all of Park Hill). Keep in mind this is the same Mayor and Administration that early on said the endless signal problems on the **A-Line trains** would "soon be resolved.." Ironically, these same neighborhoods most affected by I-70 (GES, NE Park Hill, N Stapleton) had to listen to horn blasts, 4 each crossing, every 15 minutes or less, 22/7, for almost 3 years! This slow torture was ruinous to sleep and the wellbeing for many and wasn't how it was sold (and I supported FasTracks!) You might ask how you could NOT have signals properly tested and approved before beginning service, or cease service once a resolution was months or years away. But the answer was likely the Mayor didn't want to hold up his Corridor of Opportunity or his star train, and that was more important than disrupting sleep and life in these neighborhoods. Image is everything after all. And stopping was near impossible anyway because RTD had to pay their P3 who built the line. Once started, it's very difficult to stop projects with P3's. Keep that in mind every time you heard these horns blaring. Keep that in mind with P2PH/I-70 because they're all using P3's and come hell or toxic water, they intend to complete all of it for the Corridor of Opportunity.

Speaking of **P3's**... RiNo and Brighton Blvd developments, NWC, RTD, and I-70 all have their own P3's yet we are paying the majority of their drainage (and any CDOT delay fees) as taxpayers via P2PH. Shouldn't they pay their own way especially since they keep the profits (like the "Lexus" toll lanes on new I-70 whose rates are set by the developer)? Is this double taxation? Taxpayer subsidies for private profits? Or just standard business in Denver now? Whose wellbeing are we looking out for again?

Though it's true Elyria and Swansea will now get 100-year protection, it wasn't out of any largess by the City who's known of their issues for years. The real push was to protect the NDCC/I-70 PCL and they happened to be right there. The price they'll pay is a larger I-70 dropped in their yards. It will also result in the demolition of 56 homes and 17 businesses. Meanwhile, all are told not to worry about two giant ditches (39th Ave Open Channel & I-70 PCL) and a giant Outfall (GLO) being dug through an unremediated Superfund site (Vasquez Blvd and I-70) and toxic landfill in 80216- called the most toxic zip in the U.S. (from ATTOM's Feb 2017 Hazard report). Because much is being contracted through P3's, environmental oversight is less clear and records are sealed (no **FOIA** or **CORA** with P3's). The choice that actually had the wellbeing of residents in the **GES** neighborhoods in mind was to reroute I-70 to **I-270/76**. It's more industrial and the 55-year-old I-70 scar across these communities could finally be healed. But CDOT used absurd pricing to claim it would cost 4.3B, or twice I-70 PCL. They used costs per lane mile over 5x what T-REX used. They also didn't subtract I-270/76 improvements already in the works but added them back in. And they got away with it! I-70 PCL is flashier, more direct and fits the Mayor's image of quick Lexus lanes from DIA to downtown, easy access to the NWC (future Olympic village?) and Brighton Blvd's gateway to downtown, all while on his Corridor of Opportunity. But I-270/76 was the sane choice they removed.

If P2PH is for our benefit, then it's one GIANT coincidence that this urgent 100-year storm protection happened to come at the exact same time and the exact same place as a major highway being dropped into the ground and requiring 100-year protection. You also need to overlook all the other large projects in the area like the NWC, parts of the RiNo/Brighton Blvd developments, and RTD Rail Lines and Stations that will all get 100-year protections as well. You need to ignore all the Olympic aspirations attached to each of these projects including I-70. You need to pretend there's no gateway to downtown, Corridor of Opportunity, or NDCC right in this exact same location. You need to disregard the lack of prior stated need for any of this in any of Denver's earlier Storm Drainage Master Plans. Or..... perhaps it's not a coincidence. Maybe instead the City found a way to protect its NDCC portfolio developments by leveraging funding from CDOT, having taxpayers pay the rest in the largest Stormwater rate increase ever, to provide 100-year protection to a small area of Denver prized by the City and developers, all disguised as neighborhood protections. Maybe CDOT leveraged City dollars (via the same Denver taxpayers) to help pay for one of the largest projects in CDOT history, getting Denver to provide the majority of the required flood protection for the PCL, and pay CDOT's P3 developer for the next 30 years, all disguised as the one and only option for I-70 and the communities. Maybe, in other words, it was subterfuge. We were all played. One thing is certain... if benefits do finally come to upstream communities (including all of Park Hill), it won't be because P2PH was the only way to do it. It was however, the fastest, most direct and immediate way to protect all the signature developments in the Montclair Basin bottomlands with 100-year flood protection, courtesy of you. The BIG LIE is that P2PH is first and foremost about neighborhood flood protections... unless your neighborhood is called the **NDCC**.