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COUNTY OF PARK
Board of County
Commissioners



May 28, 2020

Colorado Department of Public Health and Environment
Attention: Jill Hunsaker Ryan, Executive Director
4300 Cherry Creek Dr. South Denver, CO 80246
Via email: jill.ryan@state.co.us

Dear Director Ryan,

Re: Safer at Home; Request for Variance

Park County respectfully requests relief from certain provisions of the Safer at Home Executive Order D 2020 044 and Colorado Department of Health (CDPHE) Public Health Order 20-28 as amended (PHO 20-28). Specifically, Park County requests a variance from Executive Order D 2020 044 and the Amended CDEPHE Order 20-28 (the "State Orders) to implement its own reopening plan for short-term vacation-style rentals; to expand Necessary Activities to include guided and non-guided fishing, hunting, boating, camping, horseback riding, zip-lining and course ropework; and to expand Critical Services to include houses of worship and community centers.

Relief from State Orders will allow Park County to effectively meet the needs of its community, improve mental health of its citizens, and begin economic recovery. This request is outlined in the attached disease suppression plan. We hope that you will agree that this variance is supportable for the following reasons.

- Park County has a low case count based on population – 23 people, less than 0.12%.
- Park County can effectively monitor and contain its cases.
- Park County is proposing minimal changes to PHO 20-28 that remain respectful of social distancing protocols and protection of health.

We grasp the difficulty presented to you and your team by this pandemic, and the gravity of the decisions with which you are tasked. We truly appreciate your efforts and consideration of our request.

Sincerely,

Board of Commissioners

Director of Public Health


Richard Elsner


Mike Brazell


Ray Douglas


Lynn Ramey

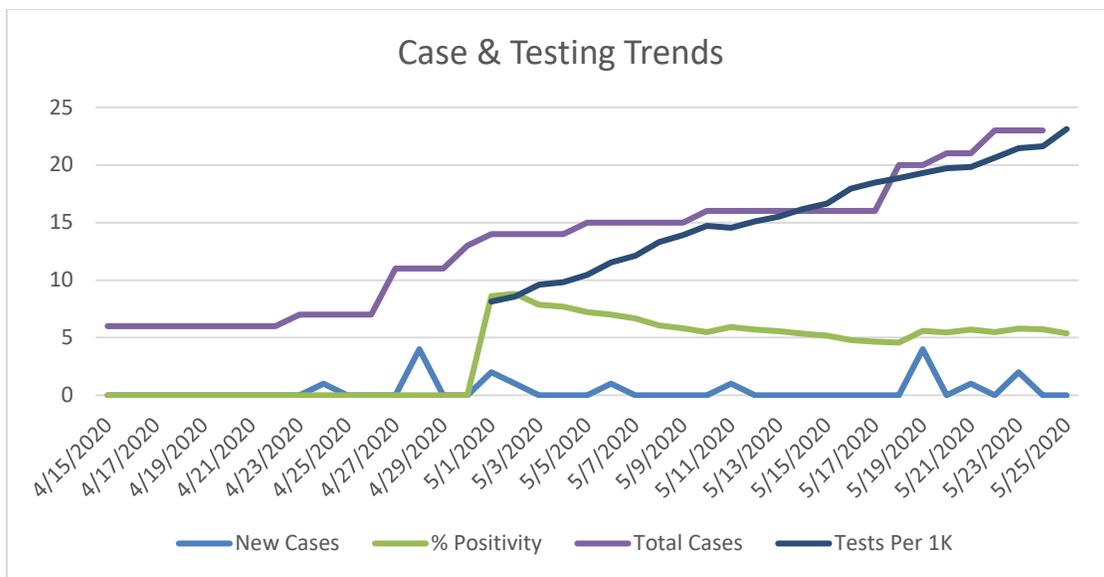
PARK COUNTY SAFER AT HOME VARIANCE REQUEST COVID-19 SUPPRESSION PLAN

Prevalence of COVID-19 in Park County

(Note: All data within this plan is as of May 25, 2020.)

The total population of Park County is less than 18,600, and our current COVID-19 case rate is 0.12%. We have had 23 positive (including probable) cases of COVID-19, 4 of which were hospitalized, and 20 of which have recovered. Most individuals have been mildly to moderately ill, and most cases have been ready to release from isolation after the 10-day isolation period. There have been no COVID-related deaths in Park County. Half of our cases have been related to employment situations in surrounding counties.

The following graph depicts cases, tests, and trends since April 15, 2020. Note that our maximum daily new case load has been 4 cases. Logically, our case load has increased at essentially the same rate as available testing. Our test positivity rate has remained steady, less than 10%.



Hospital Capacity

There are no hospitals in Park County. Depending on the needs and locations of our residents, they may go to hospital service providers in the Denver metro area, Summit County, Teller County, or Chaffee County. Park County Public Health Agency (PCPHA) has been monitoring those facilities' available capacity daily on the EMResource Dashboard, and the impact that Park County could have on any of them is minute compared to the impacts of other communities on them.

While securing personal protective equipment (PPE) for a possible surge is a real concern, PCPHA has been successful in securing PPE through the Strategic National Stockpile. The aforementioned nearby

hospitals have indicated that they have sufficient PPE and other necessary supplies to provide care for the numbers of patients within their bed count. PPE is sufficiently available.

Park County has prepared an Alternative Care Plan for Tier 4 facilities throughout the County should they be needed. A copy is available upon request.

Local Containment Measures Proposed

Testing within the County has been limited. But, when offered, public attendance has been sparse. Fewer than 500 people have been tested. The current positivity rate is 5%. The current number of cases per population is 0.12%.

Park County recently received supplies to begin testing at the main Park County Public Health Agency (PCPHA) office this week. We estimate a need for 10 tests per week, and will be receiving 100 tests. Additional testing is available at the closest Federally Qualified Health Centers.

PCPHA monitors CEDRS on an ongoing basis. Testing sites communicate any positive tests received within 24 hours to PCPHA, who immediately starts the investigation. All of our positive cases have self-isolated. PCPHA issues isolation and quarantine letters to all positive cases and their contacts.

Staff can effectively manage contact tracing of no more than 6 new cases per week, or 20 active cases in total. We are currently seeking additional staff to assist and increase our capacity.

Proposed Alternate Reopening Plan and Expanded Definition of Necessary Activities

The intent of the County's Alternate Reopening Plan and expansion of the definition of Necessary Activities is to reduce transmission of COVID-19 among employees and customers, support healthy business operations, and maintain a healthy work environment. Alternate restrictions are proposed for Sections III.A.3. and Appendix F.2. of PHO 20-28 - Necessary Activities and Critical Infrastructure, as follows. All other portions of PHO 20-28 shall remain in full effect.

Variance to PHO 20-28, Section III.A.3.: Park County Expansion of the Definition of and Guidance for Necessary Activities

Engaging in outdoor activity, such as, by way of example and without limitation, walking, hiking, nordic skiing, snowshoeing, biking, running, fishing, hunting, boating, horseback riding, zip-lining, rope coursework, and camping; including these activities in a guided manner. For purposes of outdoor activity, parks and campgrounds and associated playgrounds and picnic areas will remain open to the public to engage in outdoor activities. Basketball and tennis courts may be open for use by individuals or members of the same household only. All such activity shall be conducted in a manner compliant to PHO 20-28 I.H. The following requirements also apply to Necessary Activities, as applicable.

- Businesses shall prepare a written social distancing protocol that demonstrates compliance with PHO 20-28 and the requirements listed herein, and maintain copies at the activity location, and elsewhere available upon request from the owner and operator.
- All equipment must be cleaned and disinfected between uses.
- All wearable equipment, such as helmets, life jackets, and safety harnesses shall be cleaned in a sanitizing solution after each use and allowed to air dry before reuse.
- No contact check-in and payment should be made available as much as possible.
- Do not allow customers to wait in lobby or in lines outside of the doors.
- Make digital waivers available if possible, to limit contact.
- Customers and employees shall be required to wear face coverings, where possible.
- Post signs at entrances regarding face coverings, and post signs throughout the facility as needed to remind guests of social distancing and proper hygiene.
- Occupancy of any building shall not exceed 50% of its occupancy as prescribed by the 2012 International Building Code, as long as social distancing can be followed.
- Mass transit specific to these activities is prohibited.
- Seats, handrails and other frequently touched surfaces must be cleaned between customer groups.
- Check-in times shall be scheduled to reduce the number of guests arriving at one time.
- Environmental cleaning and disinfection of bathrooms and high touch surfaces every two hours shall be conducted, and a cleaning log and maintained.
- Employee health shall be monitored and logged. COVID-19 symptomatic employees must be excluded from the workplace and shall participate in CDPHE's Symptom Tracker program.
- Employees shall be required to wear a non-medical cloth face covering over the nose and mouth. Individuals that cannot wear a mask shall not be permitted to work at this time.

Variance to PHO 20-28, Appendix F.2: Park County Guidance for Places of Accommodation, Including Hotels, Motels and Private, Short-Term Vacation-Style Rentals

Places of accommodation, including hotels, motels, and private, short-term vacation-style rentals such as those arranged through an online hosting platform, including but not limited to VRBO or Airbnb, homeowner rentals, and privately-owned residences for rent that are rented for a period of 30 days or fewer. In addition to the social distancing requirements included in PHO 20-28, the following requirements shall apply.

- Businesses shall prepare a written social distancing protocol that demonstrates compliance with PHO 20-28 and the requirements listed herein, and maintain copies both posted and visible on-site, and elsewhere available upon request from the owner and operator.
- Provide outreach and signage, as well as appropriate space configuration to ensure at least 6 feet of physical distancing for guest groups, employees and anyone who enters lodging properties (including construction workers, maintenance, vendors, suppliers, inspectors, etc.).
- Employee protective measures, including mandatory masks, health screenings, PPE and other measures, shall be utilized.
- Guests, employees, vendors, suppliers, will be required to wear masks or facial coverings in common areas indoors and anywhere that 6 feet of physical distancing can't be maintained.
- Signage shall be posted for the benefit of employees and guests demonstrating compliance with

the minimum requirements. Self-certification, and health screenings shall be required to ensure that no one who is ill is allowed to enter our properties.

- Employees and staff shall have access to PPE appropriate for their job per the industry approved protocols (this may include face coverings, gloves and other PPE items). Each property will evaluate what other protective measures are needed depending on their unique layout, configuration and business need.
- Guests shall be advised of their responsibilities to wear a face covering when in indoor public spaces, physically distance, wash their hands and practice good hygiene, report symptoms and stay home when they're sick.
- Frequent, thorough and scheduled cleaning and proper disinfecting of all high touch areas required.
- Check restrooms regularly and clean and disinfect based on frequency of use.
- With the exception of central public lobbies, all common areas shall be locked off from public use. For the use in this request, common areas shall include (by way of example and not limited to) work-out rooms, saunas, swimming pool areas, common use hot tubs and spas, meeting rooms and general public gathering areas regardless of adherence to minimum physical distancing protocols.
- Discontinue housekeeping services during guest stays to prevent transmission between rooms and to housekeeping staff.
- Where provided, include a complete change of towels, linens, pillows, and guest consumable items.
- Ensure all hard surfaces and high-touch areas are completely disinfected with an EPA-registered chemical disinfectant when cleaning guest rooms.
- Provide guests with their own sanitation solutions or wipes to instill guest confidence (e.g., alcohol wipes for remote controls or shared surfaces).
- Wait at least 24 hours before allowing any staff into any recently occupied unit be it a hotel-style room, or dwelling unit.
- Lodgers shall provide at least 24 hours between rentals.
- Food service must comply with current applicable Public Health Orders governing restaurants and food service.

Variance to PHO 20-28, Appendix F.5: Park County Guidance for Houses of Worship and Community Centers

Critical Services shall include houses of worship and community centers, which shall operate in strict compliance with Social Distancing Requirements for employees and all visitors, as well as the following requirements.

- Facilities shall prepare a written social distancing protocol that demonstrates compliance with PHO 20-28 and the requirements listed herein, and maintain and post copies on site, visible to visitors.
- Provide outreach and signage, as well as appropriate space configuration to ensure at least 6 feet of physical distancing for visitors and employees.
- Employee protective measures, including mandatory masks, health screenings, PPE and other measures, shall be utilized.
- Building occupancy shall be limited to the lesser of 50% occupancy (based on the International Building Code) or 50 people, through removal of seating or placement of restrictive signage.

- Group (i.e., family) size shall be limited to 8 people.
- Groups must maintain 6-foot separation.
- Deep clean and disinfect all shared surfaces between meetings and services.
- Use only disposable shared items, such as hymnals, reference documents, etc.
- Provide signage at doors telling guests that are experiencing COVID-like symptoms not to enter. Participants should wear a face covering when entering and leaving the facility; and to the extent possible while present in the house of worship.
- Consider accommodations for high-risk individuals (e.g. online participation).
- Place markings on doors to maintain at least six feet distance where lines form.
- Implement touchless offering and communion options as much as possible.
- Guests, employees, vendors, suppliers, will be required to wear masks or facial coverings in common areas indoors and anywhere that 6 feet of physical distancing can't be maintained.
- Signage shall be posted for the benefit of employees and guests demonstrating compliance with the minimum requirements.
- Guests shall be advised of their responsibilities to wear a face covering when in indoor public spaces, physically distance, wash their hands and practice good hygiene, report symptoms and stay home when they're sick.
- Check restrooms regularly and clean and disinfect based on frequency of use.
- Food service must comply with current applicable Public Health Orders governing restaurants and food service.

Conditions and standards used to determine if the variance is providing protection equal to PHO 20-28

Thresholds that will prompt reevaluation of the requested alternate requirements, and possible reversion to more restrictive requirements, shall be as follows.

- Discovery of 6 or more new cases in Park County in any calendar week that are not associated with an outbreak.
- Discovery of an outbreak originating at any business of public accommodation in Park County.
- Development of a Park County case load (active cases) in excess of 20 people.
- Any indication that the nearest hospitals have lost or are trending towards loss of available capacity to serve Park County residents.