



COLORADO

Department of Public
Health & Environment

Application for Variance

Name of County: Arapahoe County

Name of Submitter: Michelle Halstead

Phone Number of Submitter: 303-795-4530

Email of Submitter: mhalstead@arapahoegov.com

Arapahoe County requests a variance from the following restrictions in Executive Order D 2020 044 and/or Public Health Order 20-28.

List the sections of Executive Order D 2020 044 and/or Public Health Order 20-28 that a variance is being sought for:

Arapahoe County is requesting industry-specific variance requests to the Sixth Amended Public Health Order 20-28 Safer At Home and in the Vast Great Outdoors as follows:

1. Gyms (PHO I.H.2.d and III.F), please refer to Attachment F
2. Restaurants (PHO II.C.1), please refer to Attachment G
3. Houses of worship (PHO II.M), please refer to Attachment H
4. Indoor Malls (PHO Appendix A, Section III), please refer to Attachment I

Summarize alternate restrictions being proposed to replace the above-referenced restrictions and indicate where in the Plan these alternate restrictions are addressed:

Please see Attachments F, G, H, and I for proposed industry specific alternate restrictions:

1. Attachment F - Gyms
2. Attachment G - Restaurants
- c. Attachment H - Houses of worship
- d. Attachment I - Indoor Malls

Upload your county COVID-19 Suppression Plan and documentation demonstrating approval by the county commissioners, and confirmation from all impacted local hospitals that they can serve all individuals needing their care. Provide a brief summary of each of the following elements contained in the county COVID-19 Suppression Plan and indicate where in the Plan more information can be found for each element.

1. Prevalence of COVID -19 within the county

Please see page 2 of the Arapahoe County June 5, 2020, Suppression Plan.

2. Hospital Capacity

Please see page 6 of the Arapahoe County June 5, 2020, Suppression Plan as well as Attachment D.





3. Local containment measures

Please see page 7 of the Arapahoe County June 5, 2020, Suppression Plan.

4. Conditions to determine the variance is not providing adequate COVID-19 protection and the triggers for tightening restrictions.

Please see page 10 of the Arapahoe County June 5, 2020 Suppression Plan.

 Confirm that the variance requested does not lessen or eliminate the protections for Vulnerable Individuals in the Safer at Home Order and PHO 20-28.

 Confirm that the county will collect and monitor data to evaluate the impacts of the variance. and make such data available upon request by CDPHE.

Additional information relevant to the requested variance

By signing below, I attest that I am authorized pursuant to the adoption of the COVID-19 Suppression Plan by the Board of County Commissioners to submit this variance request to CDPHE for consideration.

DocuSigned by:



97A931BC1BBB4EA

2020-06-10

Signature

Date



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Board of County Commissioners

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Littleton, Colorado 80120-1136
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June 10, 2020

Executive Director Jill Hunsaker Ryan
Colorado Department of Public Health & Environment
4300 Cherry Creek South Drive
Denver, CO 80246

KATHLEEN CONTI
District 1

NANCY N. SHARPE
District 2

JEFF BAKER
District 3

NANCY JACKSON
District 4

BILL L. HOLEN
District 5

RE: Arapahoe County Request for a Variance from the Safer At Home Executive Order and Public Health Order

Dear Director Hunsaker Ryan,

The Arapahoe County Board of Commissioners (Arapahoe County) respectfully request a variance from some of the provisions of Governor Polis' Executive Order 2020-044 Safer at Home and Colorado Department of Public Health and Environment (CDPHE) Public Health Order 20-28 (sixth amendment).

As outlined Public Health Order 20-28 III.V and Appendix G, a variance will allow Arapahoe County to implement its own reopening plans in the timeframe that best meets the needs of our communities for the following:

1. Gyms (PHO I.H.2.d and III.F)
2. Houses of Worship (PHO II.M)
3. Restaurants (PHO II.C.1)
4. Indoor Malls (PHO Appendix A, Section III)

We appreciate your consideration and cooperation in helping Arapahoe County safely open up additional opportunities for our residents and businesses while simultaneously applying appropriate restrictions to help prevent the spread of COVID-19.

Please let us know if there is any additional information needed to assist you in processing this request. The best point of contact would be Director of Communication & Administrative Services Michelle Halstead, who can be reached at 303-795-4530.

MISSION

Enhancing your quality of life through exceptional delivery of services and efficient use of public funds.

Sincerely,

ARAPAHOE COUNTY BOARD OF COMMISSIONERS



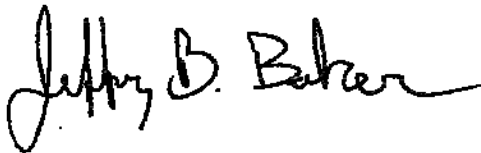
Commissioner Nancy Sharpe, Chair of the Board



Commissioner Bill Holen, Chair Pro Tem



Commissioner Kathleen Conti



Commissioner Jeff Baker



Commissioner Nancy Jackson

Attachments

1. Attachment A – Arapahoe County Suppression Plan
2. Attachment B – Arapahoe County Board of Commissioners Resolution
3. Attachment C – Arapahoe County Weekly COVID-19 Recovery Report
4. Attachment D – Arapahoe County Suppression Plan June 2020 - Hospital Letters
5. Attachment E – Letters from Tri-County Health Department, Municipalities
6. Attachment F – Gyms Variance Request
7. Attachment G – Restaurants Variance Request
8. Attachment H – Houses of Worship Variance Request
9. Attachment I – Indoor Malls Variance Request

Attachment A



ARAPAHOE COUNTY

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BOARD OF COUNTY COMMISSIONERS
COVID-19 SUPPRESSION PLAN

ARAPAHOE COUNTY, COLORADO

JUNE 5, 2020



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Arapahoe County Suppression Plan

The June 2020 Arapahoe County Suppression Plan is designed to be a dynamic document that can be modified as time progresses, additional data becomes available, and the impacts of decisions to change and reopen economic avenues are measurable. This suppression plan is comprised of the following components:

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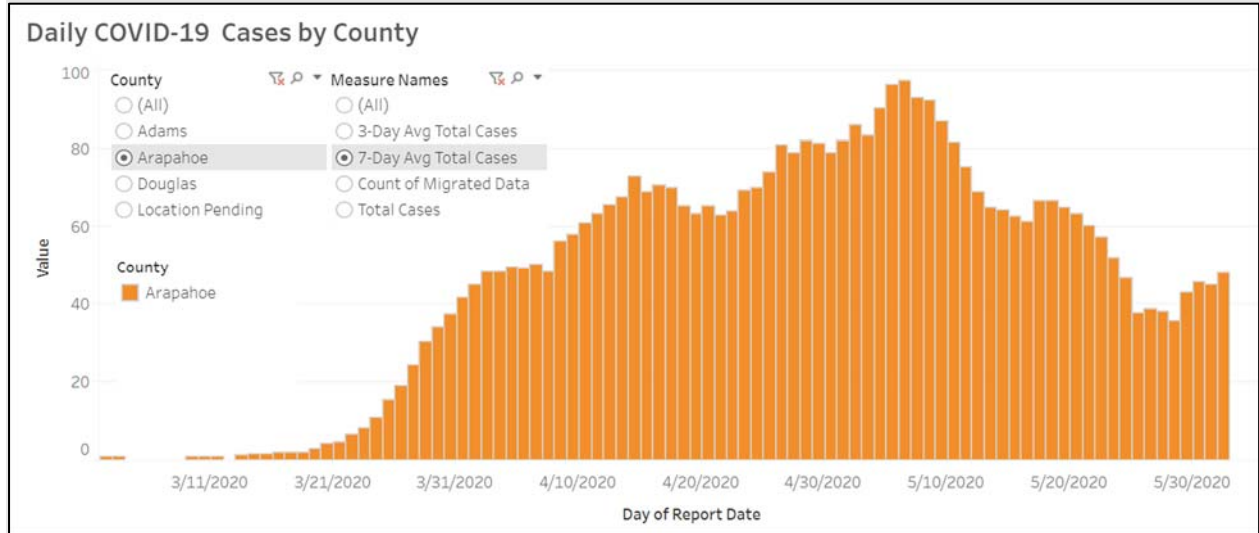
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#1 Prevalence of COVID-19 within Arapahoe County

Arapahoe County is the third-most populous county in the State of Colorado, with a total population of 643,052 (2017). Arapahoe County contains 13 municipalities, and the population living in unincorporated areas of the county totals 94,912 (2015). The county borders extend 12 miles from north to south at its widest point and 72 miles from east to west for a total of 805 square miles. The majority of the land in the county is rural unincorporated. The western-most portion of the county is heavily urbanized and is part of the larger Denver Metro Area; as of 2010 this heavily populated and developed area only accounted for 16 percent of the county’s total land area.

As of June 3, per Tri-County Health Department (TCHD) case data, there have been 4,410 confirmed cases in Arapahoe County. These cases are distributed relatively proportionally to population in the municipalities and unincorporated areas across the county. The City of Aurora contains approximately one-half of the county’s population, as well as approximately one-half of the county’s COVID-19 cases (2,994 cases). Additionally, the City of Aurora contains approximately 30% of the Long-Term Care Facilities located in the county, which contributes to their higher number of cases. Although Arapahoe County contains the second highest number of cases in the State, there has been a decreasing trend in daily case numbers since cases peaked in early May, as indicated in the graph below from TCHD. Since the lifting of the Stay-at-Home Order on May 8, 2020, a new peak of cases greater than the peak observed in early May has not occurred. Additionally, according to CDPHE outbreak data, as of May 27, 2020, nearly 25% of cases in Arapahoe County are from a Long-Term Care Facility, and according to the Arapahoe County Coroner, as of June 1, 2020, 67% of COVID-19 deaths in the County are from Long-Term Care Facilities.



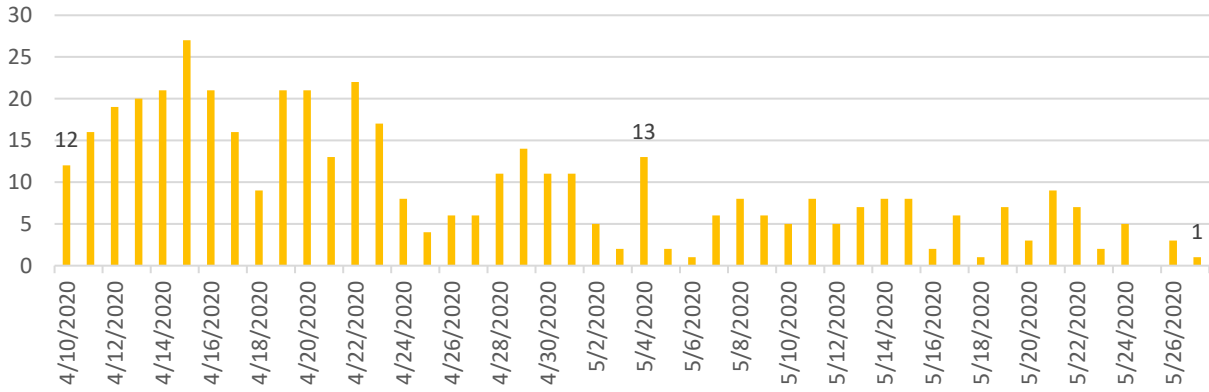
As of June 3, 2020, 0.67% of the Arapahoe County population of 656,590 have tested positive for COVID-19. There has been no sustained surge in the number of cases requiring hospitalization as a result of COVID-19 and Arapahoe County citizens performed well in compliance with the Stay-At-Home order. The following graphs illustrates the recent trends of COVID-19 hospitalizations, medical resource use, and deaths related to COVID-19 in Arapahoe County.



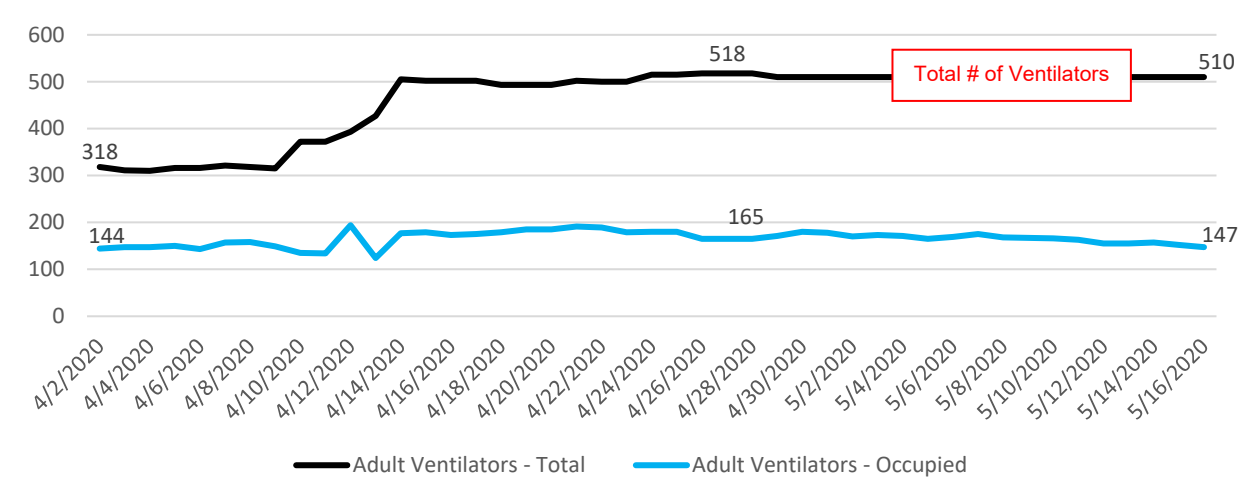
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Arapahoe County Daily COVID-19-related Hospitalizations



Arapahoe County Ventilator Utilization



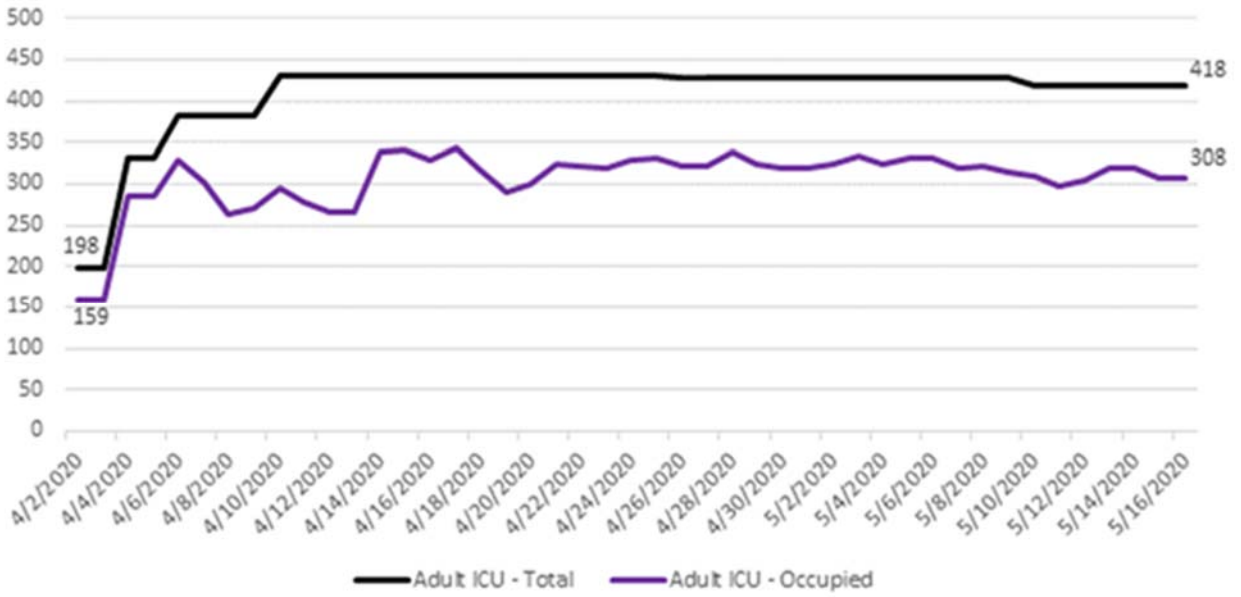


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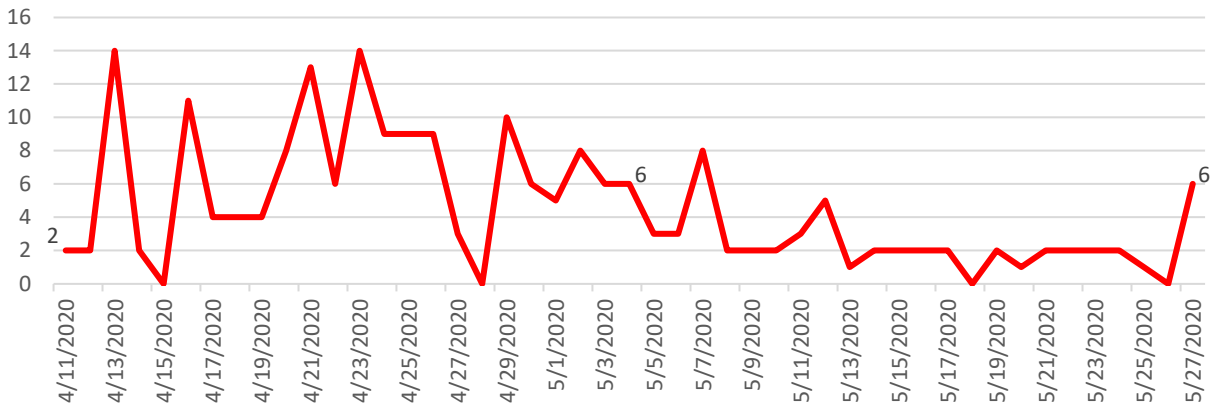


Arapahoe County ICU Utilization

Total # of ICU Beds



Arapahoe County COVID-19 Daily Deaths



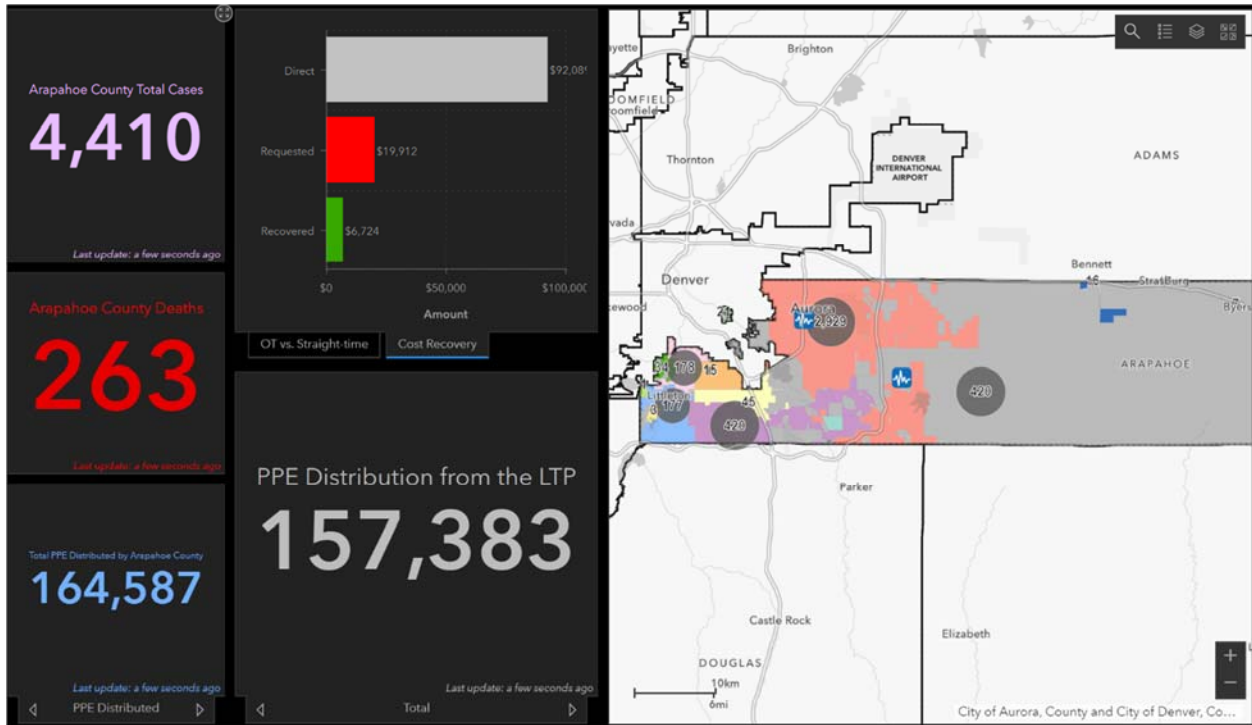


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The County Commissioners conduct regular COVID-19 updates throughout the week and receive a weekly COVID-19 situation report from the Arapahoe County Office of Emergency Management (OEM) (see Attachment C for an example). Additionally, the Arapahoe County COVID-19 dashboard monitoring case counts, deaths, and logistics data is updated daily by OEM. The County will continue to collect and monitor data to evaluate the impacts of the variance and will make such data available upon request by CDPHE. The following graphic from the daily data dashboard utilizes the case data from Tri-County Health Department and the Arapahoe County Coroner.

Arapahoe County Data Dashboard





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#2 Hospital Capacity

There are four hospitals located within Arapahoe County:

1. Swedish Medical Center Health One – 501 East Hampden Ave. Englewood CO 80113
2. Littleton Adventist Hospital Centura Health - 7700 S Broadway, Littleton, CO 80122
3. Medical Center of Aurora Health One - 1501 S Potomac St, Aurora, CO 80012
4. Centennial Medical Plaza - 14200 E Arapahoe Rd, Centennial, CO 80112

See Attachment D for the letters and affirmations from the hospitals regarding the existing ability to serve individuals seeking care from a hospital in Arapahoe County.



#3 Local Containment Measures

Local containment measures fundamental to this suppression plan include:

- Contact Tracing
- Diagnostic Testing
- Early Warning System
- Personal Responsibility

Contact Tracing

The implementation of diagnostic testing coupled with contact tracing is essential to the prevention of community spread. The Tri-County Health Department (TCHD) epidemiologists continue to investigate COVID-19 cases to control and prevent the spread of illness to others. The TCHD public health professionals are working closely with CDC, CDPHE, and other local county and municipal partners to respond to the situation carefully and share information. The TCHD has a strong infectious disease surveillance system in place that also leverages local partnerships with hospitals and clinics. They are committed to identifying cases quickly and responding to them effectively. TCHD is in the process of expanding the Operations Section in the Incident Management Team and planning to create up to 33 Contact Tracing Teams. These teams will be filled using internal TCHD staff, volunteers, and contracted staff, as needed and as determined by number of positive cases reported to the health department.

In support of this effort to ramp up case detection, the TCHD will focus the Contact Tracing Teams' capacity to follow up on any COVID-19 positive result by PCR (polymerase chain reaction) testing. The TCHD provides updated information and resources about testing on its website and is helping to facilitate connections between Arapahoe County and testing partners. Arapahoe County is able to acquire more testing kits through the CDPHE streamlined ordering system.

Diagnostic Testing

As testing supplies and personal protective equipment become more readily available and the number of testing sites increases, interpersonal transmission within Arapahoe County from a known infected individual can be greatly reduced. By increasing community-testing options those who have contracted the virus can be diagnosed, isolated and receive any treatment deemed necessary. Symptomatic citizens can be tested at Arapahoe County's hospitals and dozens of clinics. There are also clinics who will test individuals who have simply been exposed to those who have tested positive or who have traveled recently. Local testing capacity is continuing to increase tremendously to those who are both symptomatic and asymptomatic. Arapahoe County is also collaborating with TCHD staff to identify and leverage existing sites with unused capacity to ramp up testing efficiently.

Tri-County Health Department is using a study by Harvard which established recommendations for each state and the appropriate level of testing.¹ A workgroup of the Denver Metro public health agencies developed a document that outlined each county's levels based on Harvard's

¹ "Analysis: More than half of U.S. states aren't doing enough COVID-19 testing"

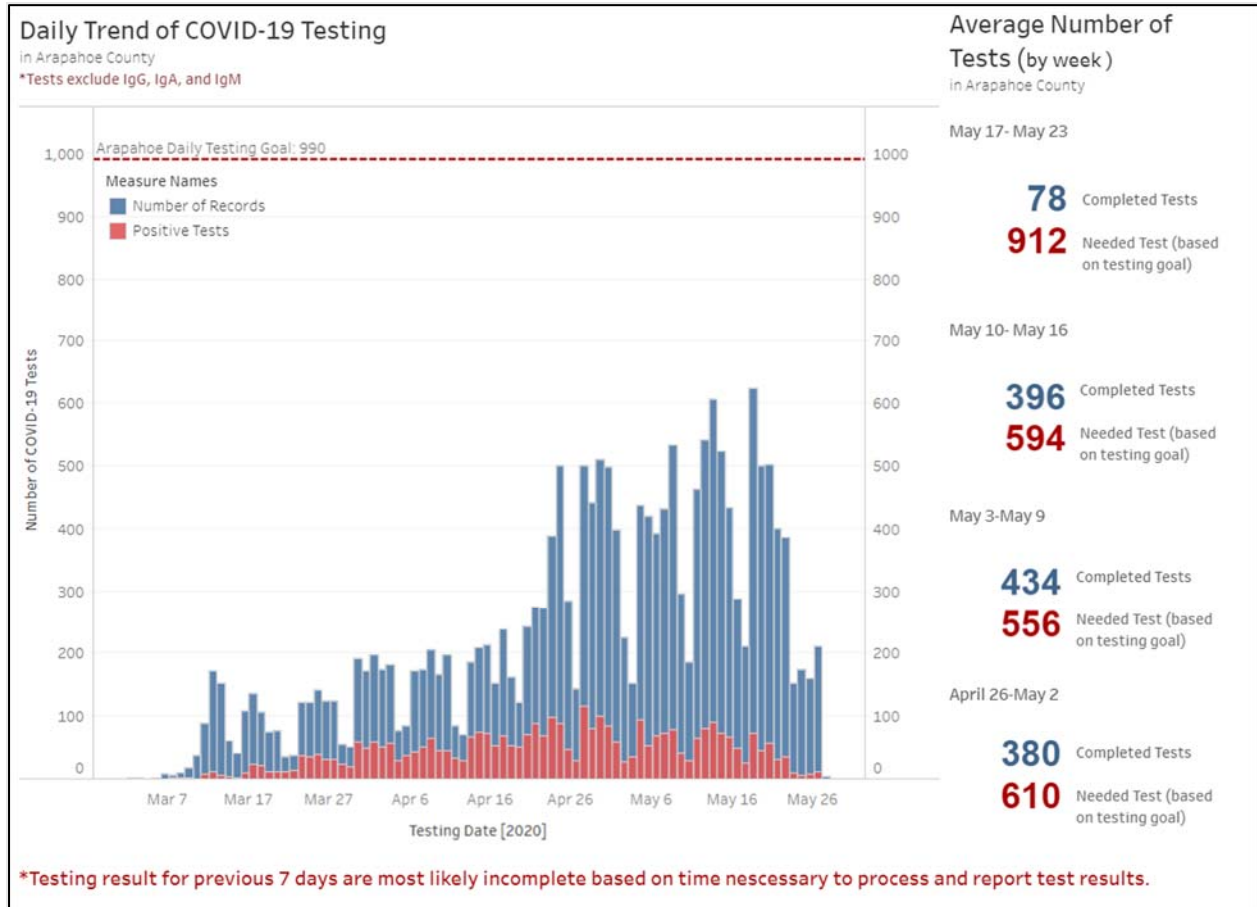
<https://www.hsph.harvard.edu/news/hsph-in-the-news/analysis-more-than-half-of-u-s-states-arent-doing-enough-covid-19-testing/>



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recommendations. The document utilized a methodology which divided the tests by the population and then allocated that number of tests to each county based on population. The following graphic from Tri-County Health Department shows the total tests within Arapahoe County and the percent of those tests that came back positive. It is clear that testing capacity has increased over time.



Monitoring Systems

The Arapahoe County Office of Emergency Management tracks the following information on a daily basis to monitor the impacts of Public Health Orders:

- key public health indicators
- hospital data
- mobility information
- economic recovery indicators

This information is provided weekly to county commissioners, municipalities, school districts, hospitals, and health care providers throughout the county to help inform alternate restrictions and guide future policy recommendations on the re-opening of the County.



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Arapahoe County also is in the process of developing a COVID-19 early warning system that utilizes 911 data to identify spikes in calls related to COVID-19 symptoms. This warning system will be used to identify surges of potential COVID-19 cases in the community and prepare for the impacts before they occur. This system will also be able to identify potential hotspots of cases in the County as more businesses and activities open.

Finally, the North-Central Region (NCR) is developing a software system to monitor real-time hospital data to determine factors such as ICU bed use, ventilator use, and number of COVID-19 patients. This will enable real-time monitoring of our hospital systems and quickly anticipate the need to activate surge capacity, such as the County's Alternate Care Facility (ACF).

Personal Responsibility

The Arapahoe County Suppression Plan includes the assumption that individuals are responsible for not going out in public if sick, isolating if displaying symptoms of COVID-19, and taking adequate precautions to protect high-risk populations including the recommendation to wear non-medical face coverings. Public gatherings may occur provided social distancing requirements can be met. Lastly, high-risk and older adult populations maintain social distancing levels seen under the Safer-at-Home and in the Vast, Great Outdoors Order.

The County will continue increase public education and awareness by communicating this information throughout legacy and social media channels.



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#4 Conditions to Determine the Variance Is Not Providing Adequate COVID-19 Protection and Triggers for Tightening Restrictions

If the following County and industry specific conditions occur (these conditions do not apply to outbreaks that occur in institutionalized facilities located in the County including healthcare, long-term care and skilled nursing, jails, group homes, independent living, and more) TCHD will make a determination that the variance is not providing adequate COVID-19 protection, and determine mitigation steps and criteria for reopening for each specific industry:

- A substantial increase in hospitalizations directly related to COVID-19 over a 2-week period.
- Inability of TCHD to contact trace new cases within 24 hours of a known positive test result.
- If a business or operation experiences an outbreak:
 - TCHD must trace outbreaks back to a specific business or operation.
 - That business or operation must temporarily close and review re-opening protocols.



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Attachments:

Attachment B – Arapahoe County Board of Commissioners Resolution

Attachment C – Arapahoe County Weekly COVID-19 Recovery Report

Attachment D – Arapahoe County Suppression Plan June 2020 - Hospital Letters

Attachment E – Letters from Tri-County Health Department, Municipalities

Attachment F – Gyms Variance Request

Attachment G – Restaurants Variance Request

Attachment H - Houses of Worship Variance Request

Attachment I – Indoor Malls Variance Request



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Attachment B – Arapahoe County Board of Commissioners Resolution

BOARD OF COUNTY COMMISSIONERS OF ARAPAHOE COUNTY, COLORADO

TUESDAY, JUNE 10, 2020

At the regular meeting of the Board of County Commissioners for Arapahoe County, Colorado held at the Administration Building, 5334 South Prince Street, Littleton, Colorado on Tuesday, the 10th day of June, 2020, there were present:

Nancy Sharpe, Chair	Commissioner District 2	Present
Bill Holen, Chair Pro Tem	Commissioner District 5	Present
Kathleen Conti	Commissioner District 1	Present
Jeff Baker	Commissioner District 3	Present
Nancy Jackson	Commissioner District 4	Absent & Excused
Ron Carl	County Attorney	Present
Joan Lopez	Clerk to the Board	Absent and Excused
Joleen Sanchez	Clerk to the Board	Present
	Administrator	

RESOLUTION NO. 200275 It was moved by Commissioner Conti and duly seconded by Commissioner Baker to authorize the following Resolution:

WHEREAS, on March 9, 2020, the Tri-County Health Department confirmed the first positive COVID-19 test in an Arapahoe County resident, with public health experts recognizing the contagiousness of the illness, followed by subsequent cases reported within the County and ongoing community transmission; and

WHEREAS, Governor Polis issued Executive Order D 2020 003 on March 11, 2020, declaring a disaster emergency in Colorado due to the presence of COVID-19. Since that time, the Governor has taken numerous steps to implement measures to mitigate the spread of disease within Colorado, and has further required that several public health orders be issued to implement his orders; and

WHEREAS, Arapahoe County issued a similar resolution March 13, 2020, working with the Arapahoe County’s Office of Emergency Management, the Tri-County Health Department, and its municipalities to monitor the spread of transmission, distribute personal protective equipment to protect essential workers and vulnerable populations, as well as provide data for decision-making by county leaders; and

WHEREAS, Executive Order D 2020 044 authorizes transitioning from a stay at home model, as described in Executive Order D 2020 017 and Public Health Order 20-24 as amended, to a Safer at Home model; and

WHEREAS, any Colorado county may request a variance from the Colorado Department of Public Health and Environment authorizing implementation of an alternative COVID-19 suppression plan that differs from part or all the requirements of Executive Order D 2020 044 or the Sixth Amended Public Health Order 20-28, Safer at Home; and

WHEREAS, the variance request must include an alternative COVID-19 suppression plan endorsed by the local public health agency and adopted by the county commissioners, in addition to verification from local hospitals that they have the capacity to serve all people needing their care; and

WHEREAS, that the Board of County Commissioners (the "Board") determines and declares that seeking a variance from the current State of Colorado public health orders will further the interests of Arapahoe County and its citizens while balancing the need to protect our citizens from the virus.

NOW, THEREFORE, BE IT RESOLVED, that the Board approves the request for a variance from the State of Colorado from part of the requirements of Executive Order D 2020 044 and the Sixth Amended Public Health Order 20-28, Safer at Home, and any further amended orders that are issued with the expiration of Safer at Home on July 1, 2020, and directs that the variance request be submitted to the Colorado Department of Health and Environment upon approval as to form by the County Attorney.

The vote was:

Commissioner Baker, Yes; Commissioner Conti, Yes; Commissioner Holen, Yes; Commissioner Jackson, Absent and Excused; Commissioner Sharpe, Yes.

The Chair declared the motion carried and so ordered.

I, Joan Lopez, Arapahoe County Clerk and ex-officio Clerk to the Board of County Commissioners, in and for the County and State aforesaid, do hereby certify that the annexed and foregoing order is truly copied from the records of the proceedings of the Board of County Commissioners for said Arapahoe County, now in my office.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of said County, at Littleton, Colorado this 10th day of June, 2020.



Joan Lopez, Clerk to the Board





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Attachment C – Arapahoe County Weekly COVID-19 Recovery Report

RECOVERY WORKING GROUP WEEKLY REPORT

06/05/20

Objective: Prior versions of this report have established a baseline of metrics representing maximum social distancing; the current objective is to compare that baseline to future states as the stay-at-home order is lifted. Broadly, these metrics include: confirmed cases, hospitalizations, ICU utilization, deaths, mobility, traffic, human services, and economic indicators of societal behavior.

KEY TAKEAWAY POINTS

1. New confirmed cases in Arapahoe County are consistently flat, having declined from a peak observed in mid-April.
2. Medical resource usage in Arapahoe County is also flat; daily hospitalizations and COVID-19-related deaths have consistently been in single digits for May.
3. Douglas County, having been under the Safer-at-Home order for two weeks longer than Arapahoe County, has still not yet seen a second spike in confirmed cases, nor hospitalizations.
4. The week of June 1, 2020 indicates that mobility is still lower than usual.
5. Data on citizens accessing services through the Arapahoe County Human Services Department in May shows higher levels than normal, but it has slowed since a peak in April, and is continuing to return to normal.
6. Unemployment and other economic indicators shows that economic recovery is progressing slowly.

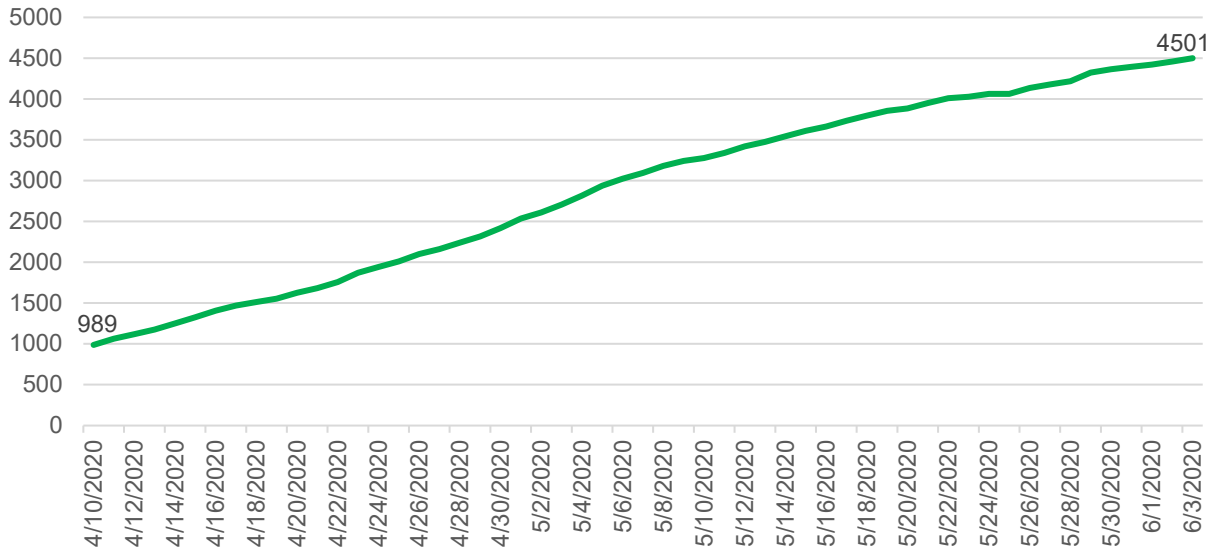
DATES OF IMPLEMENTED MEASURES

- Mass gathering restrictions: 03/19/20
- Initial business closure: 03/17/20
- Educational facilities closed: 03/23/20
- Non-essential services closed: 03/26/20
- Stay-at-home order: 03/26/20
- Safer-at-home order: 05/08/20

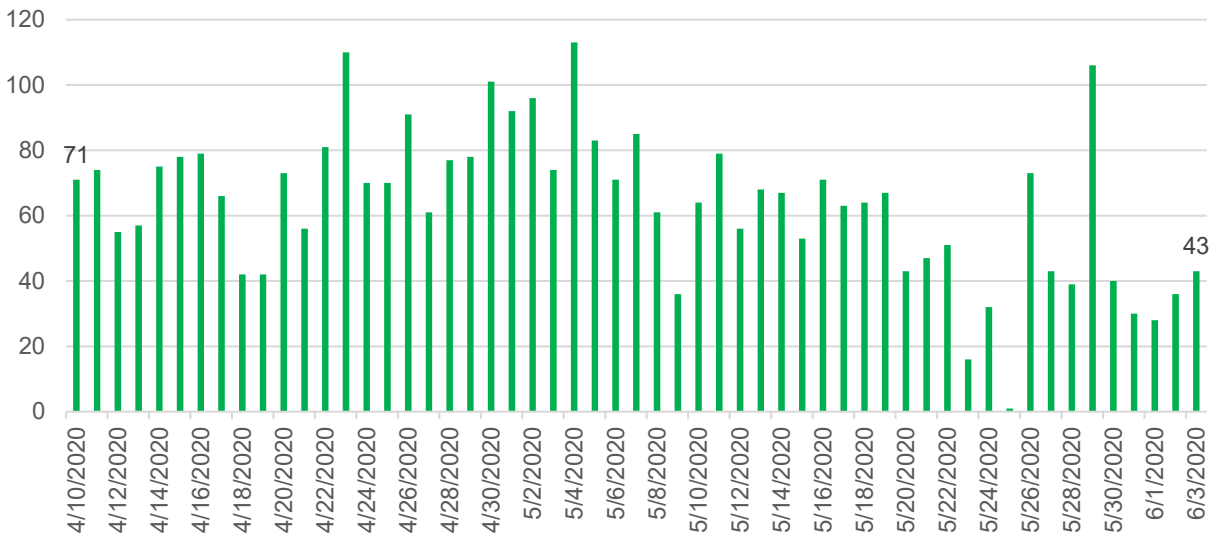
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1. Arapahoe County Confirmed Cumulative Cases¹



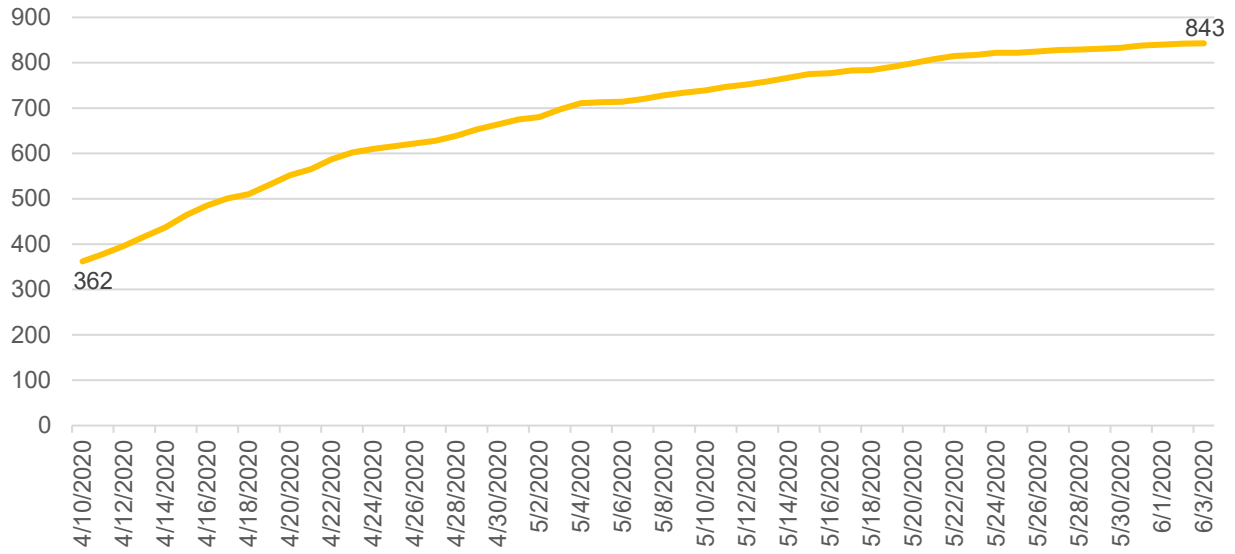
2. Arapahoe County Daily COVID-19 Cases²



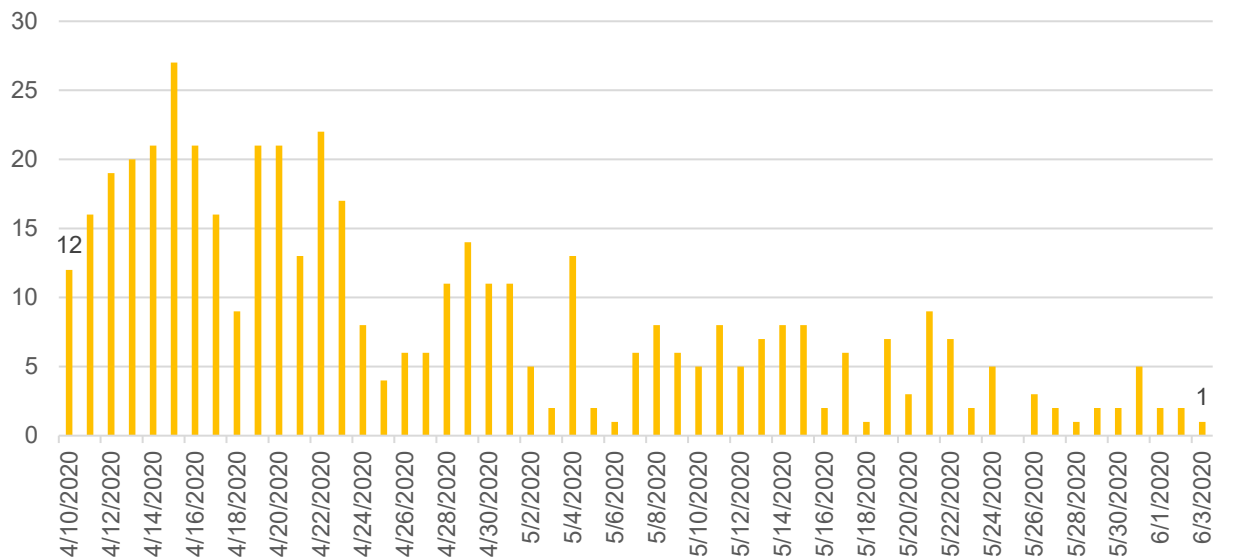
¹ Data obtained from Tri-County Health Department: <https://www.tchd.org/823/Case-Updates>

² Data obtained from Tri-County Health Department: <https://www.tchd.org/823/Case-Updates>

3. Arapahoe County Cumulative COVID-19-related Hospitalizations³



4. Arapahoe County Daily COVID-19-related Hospitalizations⁴

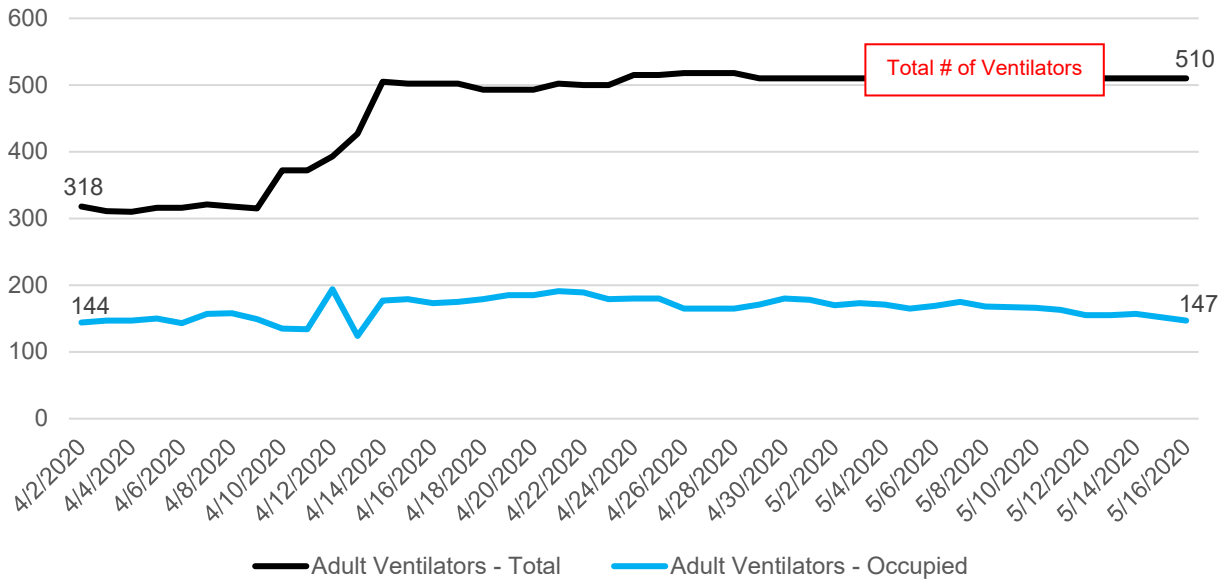


³ Data obtained from Tri-County Health Department: <https://www.tchd.org/823/Case-Updates>

⁴ Data obtained from Tri-County Health Department: <https://www.tchd.org/823/Case-Updates>

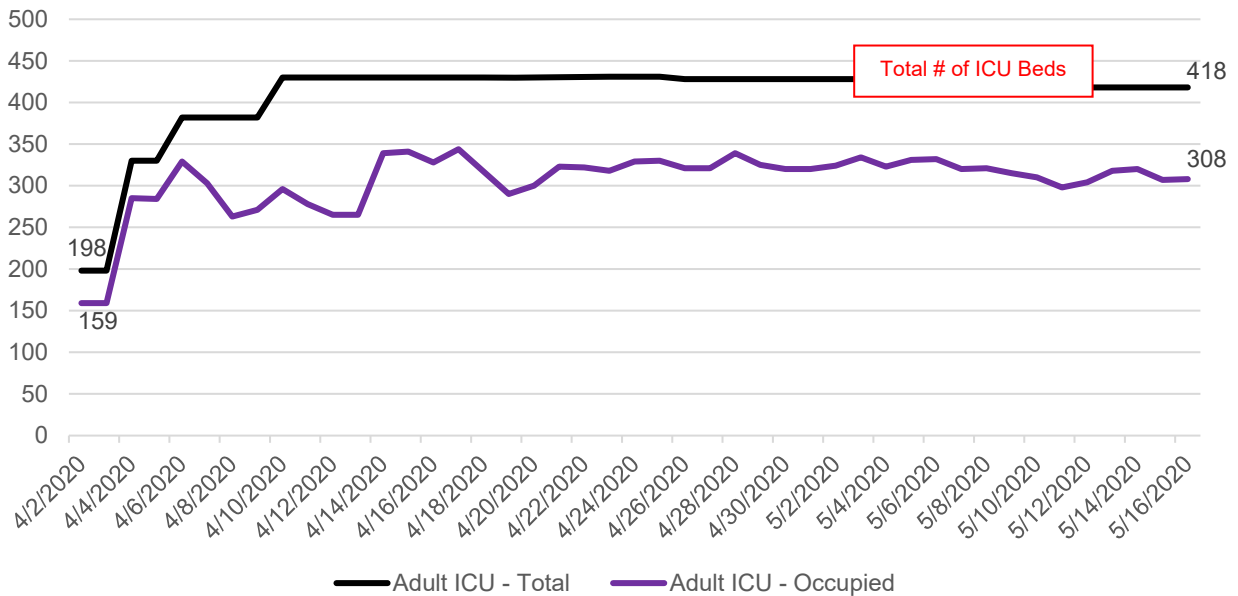
5. Arapahoe County Ventilator Utilization⁵

Note: No changes have been made to this graph since the last weekly report.



6. Arapahoe County ICU Utilization⁶

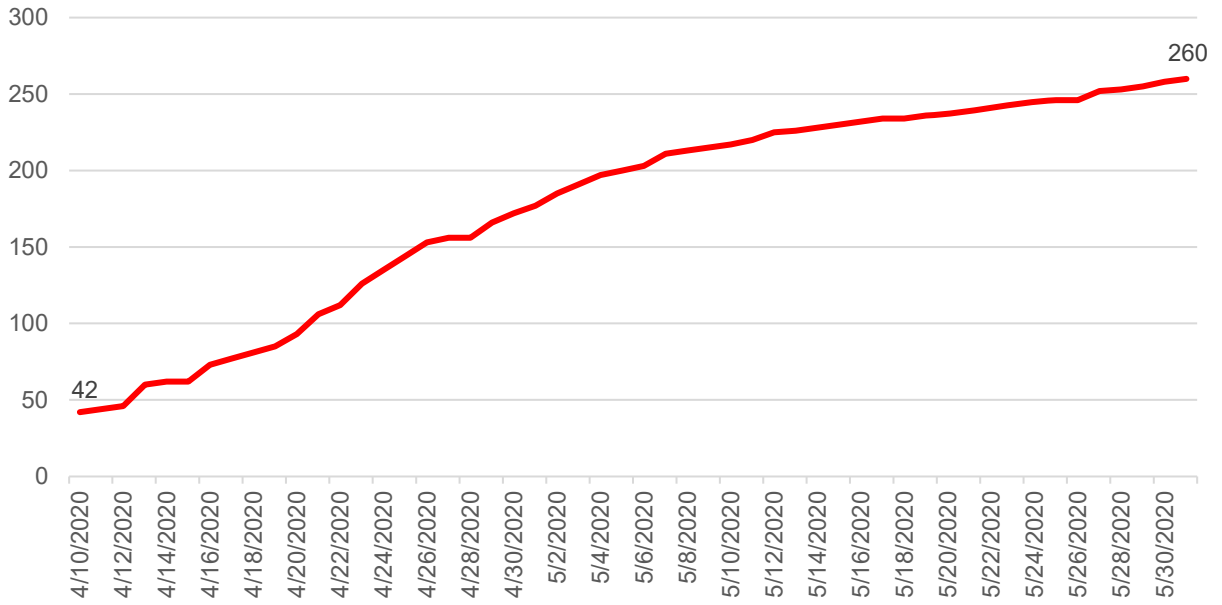
Note: No changes have been made to this graph since the last weekly report.



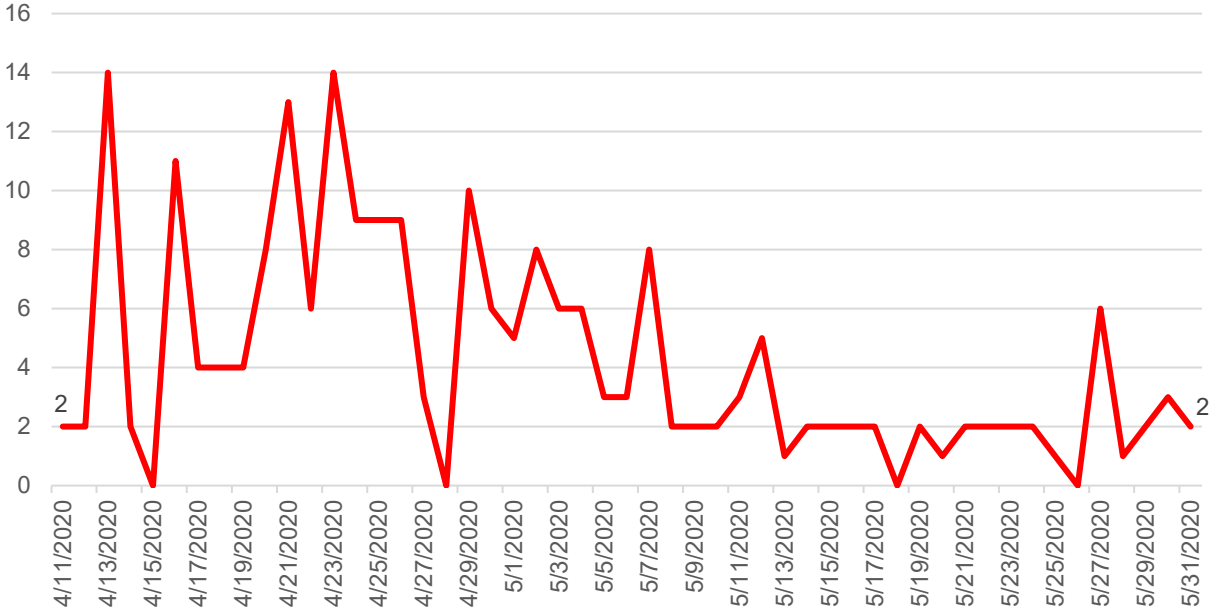
⁵ Data obtained from North Central Hospital Coalition through EMResource

⁶ Data obtained from North Central Hospital Coalition through EMResource

7. Arapahoe County COVID-19 Cumulative Deaths⁷



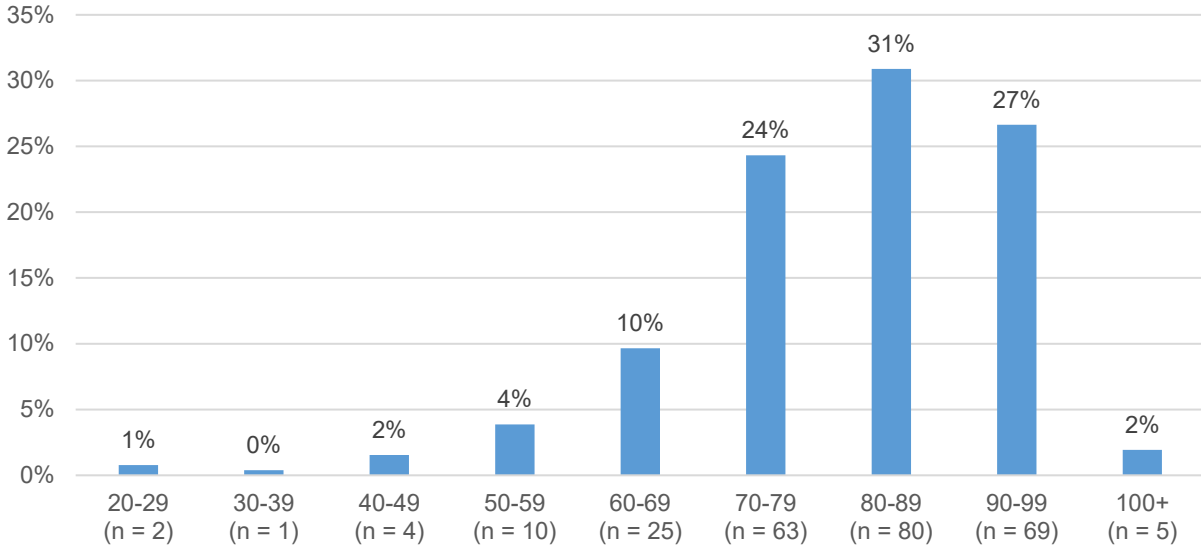
8. Arapahoe County Change in COVID-19 Daily Deaths



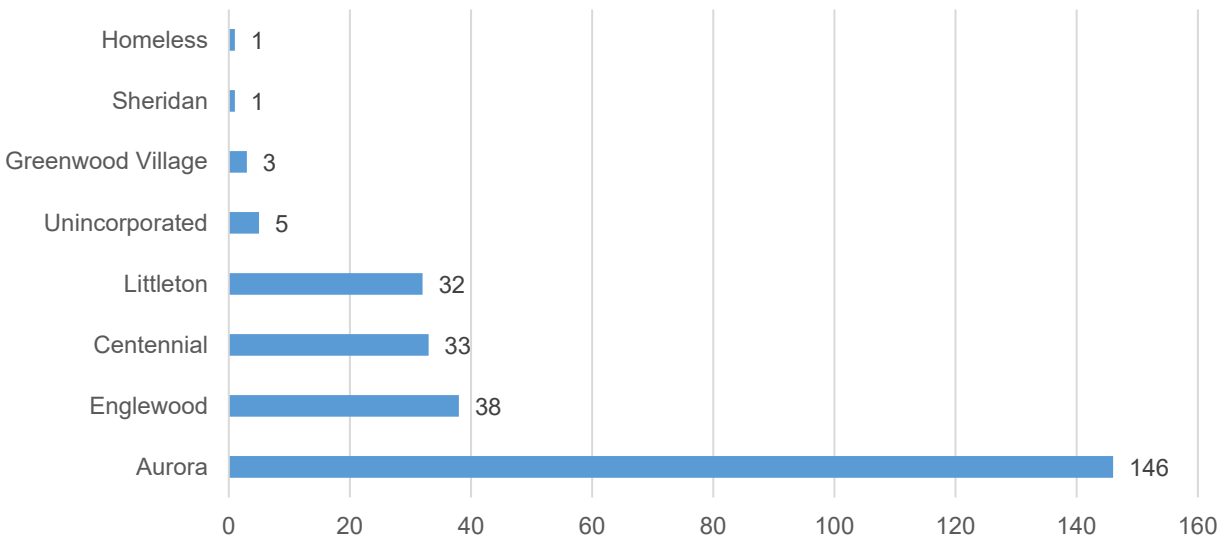
⁷ Data obtained from Arapahoe County Office of Emergency Management Daily Situational Reports

9. Arapahoe County Deaths by Age⁸

93% of all deaths in Arapahoe County were age 60 or older. The average age of those who have passed away is 81 years old. 182 of the 259 total deaths (70%) were residents of long-term care facilities (nursing homes, assisted living facilities, etc.).



10. Arapahoe County Deaths by City⁹

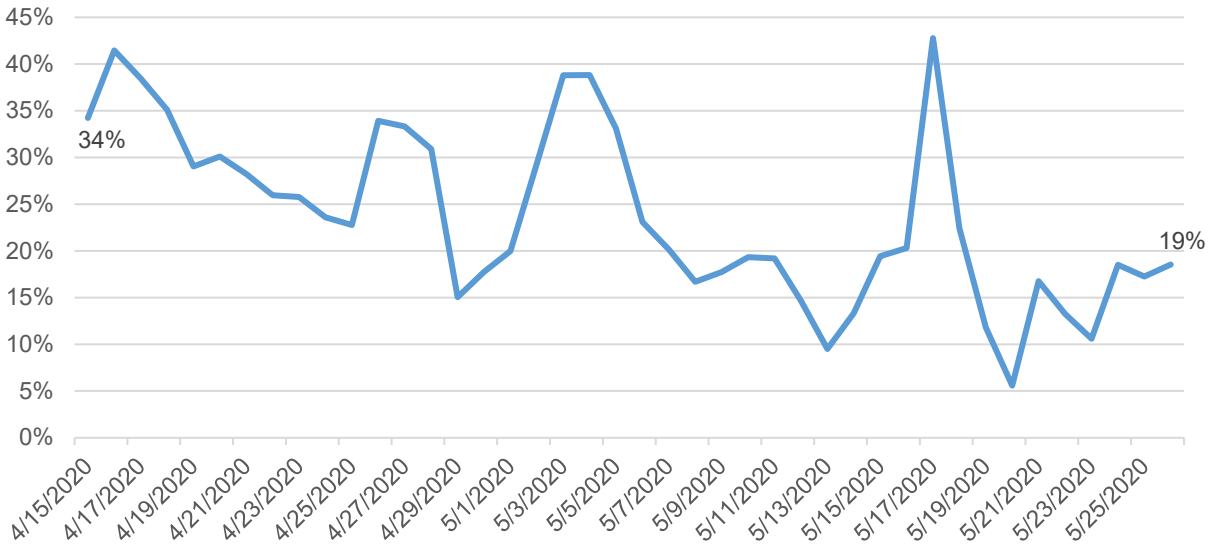


⁸ Data provided by the Arapahoe County Coroner

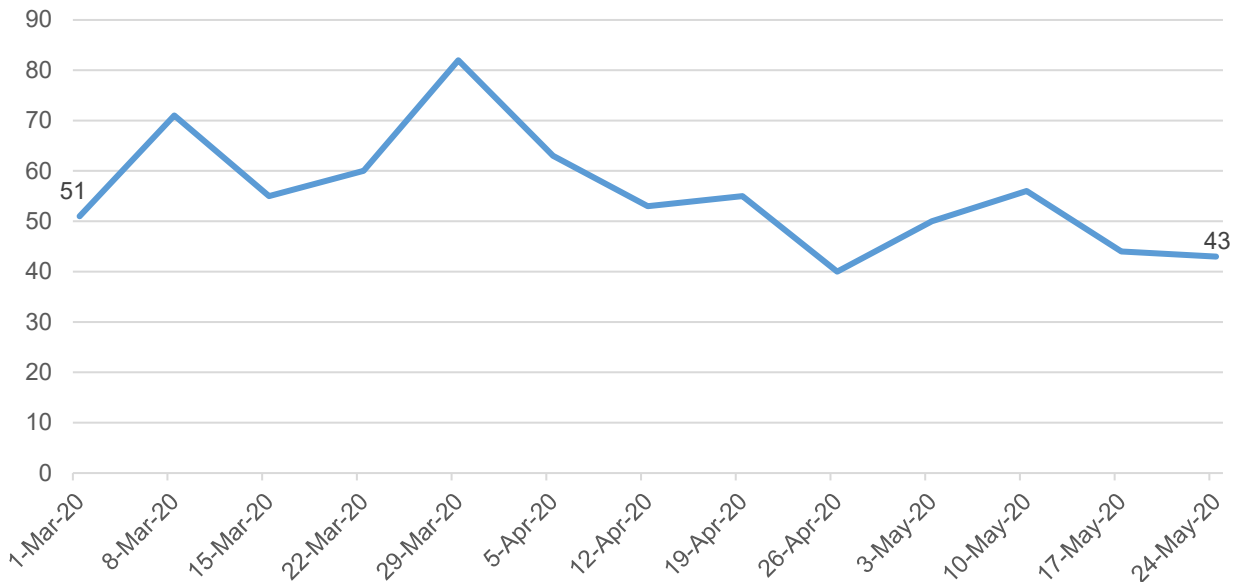
⁹ Data provided by the Arapahoe County Coroner

11. Arapahoe County Proportion of Positive Cases to Tests Taken¹⁰

According to the Tri-County Health Department, Arapahoe County has had 19,031 total tests conducted; of those, 19% (n = 3,612) have been positive. Of all the COVID-19 tests taken, the three-day running averages of the proportions (positive tests for COVID-19 to number of tests taken) are presented here.



12. South Metro Fire Rescue Authority Respiratory-related Calls¹¹

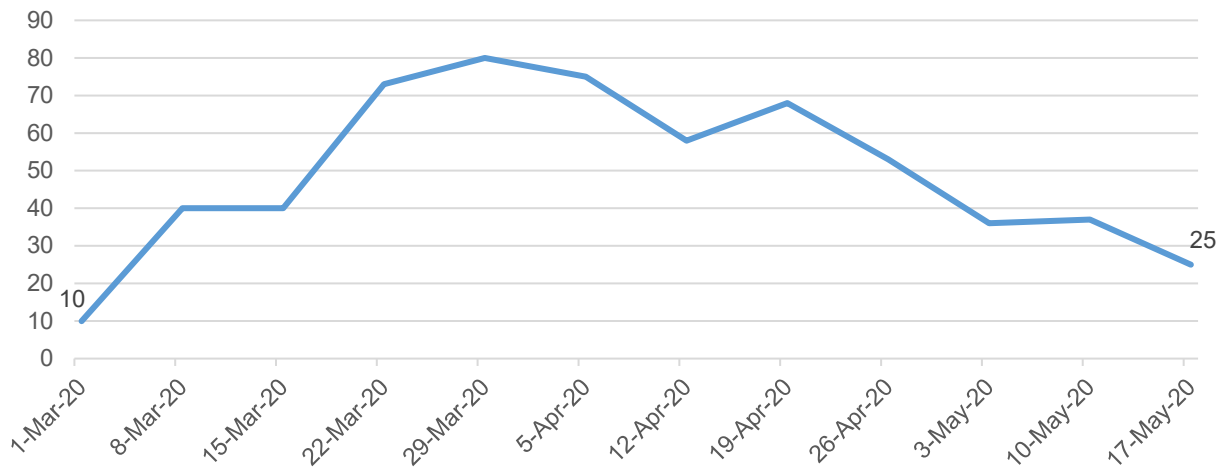


¹⁰ Data obtained from Tri-County Health Department: <https://data.tchd.org/covid19/testing/>

¹¹ Data obtained from South Metro Fire Rescue Authority

13. Aurora Fire Rescue COVID-19 Patient Encounters¹²

Note: No changes have been made to this graph since the last weekly report.



14. BioBot Analysis of Waste Water Treatment Plant COVID-19 Prevalence¹³

Note: No changes have been made to this section since the last weekly report.

- The Arapahoe County Office of Emergency Management (OEM) has been receiving estimates of active case prevalence from BioBot, a company which bases COVID-19 case prevalence on sewage analysis. The table below shows, for each date in which a BioBot estimate was provided, the actual case count data and an estimation factor showing the difference in cumulative confirmed cases and the BioBot estimate.
- Since receiving the first estimate on March 28, the estimation factor is reducing. This is consistent with OEM's prediction that the gap as between actual live cases and confirmed cases is being reduced due to increased testing availability, the difference between BioBot estimates and confirmed cases is also being reduced.
- The dramatic reduction in estimation factor observed between mid-April and early-May is due to the fact that BioBot is measuring live case prevalence, while the comparison to cumulative confirmed cases is counting all cumulative cases. There is no way of knowing which "confirmed case" is still live; the convergence indicated in the table is to be expected.
- The convergence is also consistent with the effect of social distancing on 'flattening-the-curve' and being past the peak in new confirmed cases, which for Arapahoe County was in early May.
- Further implications
 - This data confirms the "peak" in cases indicated by confirmed cases. The figures in Sections 2 and 3 of this report show that the peak in new confirmed cases was the first week of May. This data shows the peak in prevalence in the last half of April. This is consistent with the theory that there is a two-week delay in what testing tells us about actual prevalence.

¹² Data obtained from Aurora Fire Rescue

¹³ Data obtained from BioBot, the participating waste water district, and Tri-County Health Department

- We can estimate that somewhere between 5-7% of Arapahoe County’s population has had the virus based on extrapolation of the BioBot estimates to the entire population going back to March 1, 2020.

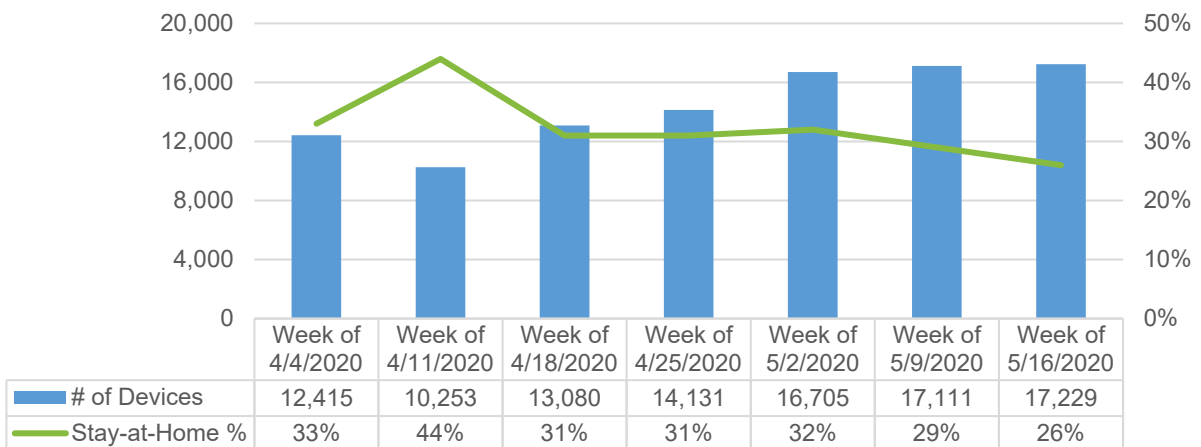
Date	Cumulative Confirmed Cases in Service Area	BioBot Estimated Cases	BioBot Estimate Factor
March 28, 2020	149	2,160	16x
April 16, 2020	423	7,000	14x
April 27, 2020	622*	6,600	10x
May 4, 2020	815*	4,400	5x

*Estimates based on a growth in cumulative cases in the three counties served by the sewer district and the data provided by Tri-County Health Department and Jefferson County Health for 3/28/20 and 4/16/20.

- Fatality rate estimate based on BioBot results:
 - As of May 7, 2020, there were 2,973 total cases in Arapahoe County (data source: Tri-County Health Department) and 211 COVID-19 deaths (data source: Arapahoe County Coroner).
 - Based on the results of the BioBot data, utilizing an infection rate of 14x higher than the confirmed case count, there is an estimated 41,622 cases in Arapahoe County as of May 7, 2020.
 - With 211 deaths and 41,622 cases, this brings the fatality rate to 0.51%.
 - The fatality rate being reported by the Colorado Department of Public Health and Environment based on confirmed cases is 4.6%.

15. Arapahoe County BlueDot Mobility¹⁴

BlueDot estimates that 26% of 17,229 devices stayed at home the week of May 16, 2020. This compares to a pre-COVID-19 (February 2-February 15) stay-at-home percentage of 11%.

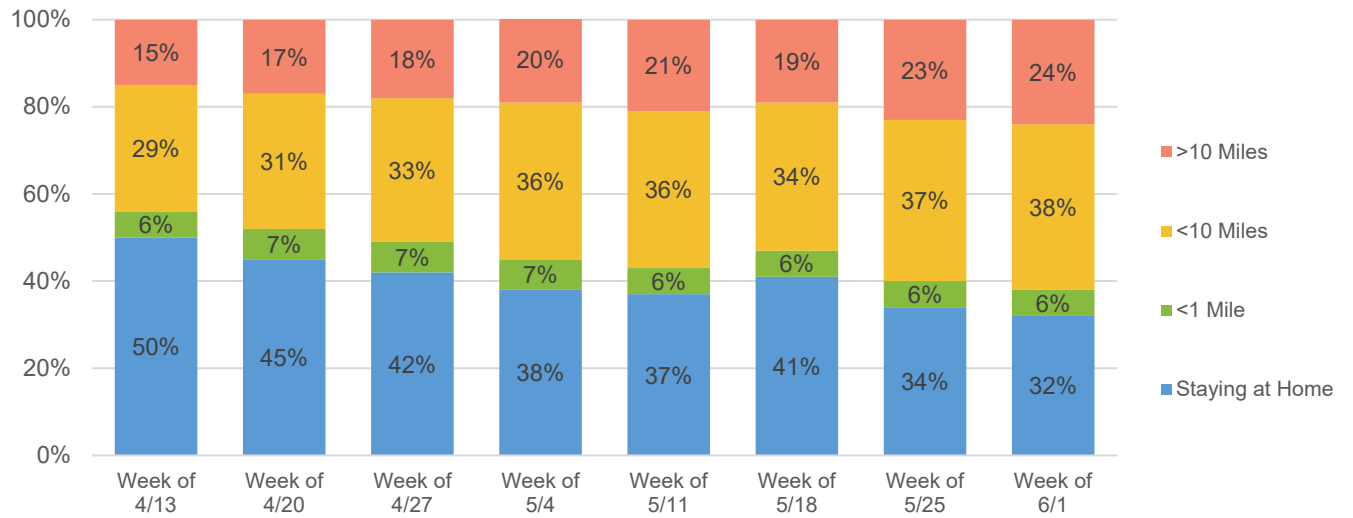


¹⁴

<https://www.arcgis.com/apps/InteractiveLegend/index.html?appid=2ac4284cd5ff4d6ead6ce4d7e6ccb588>

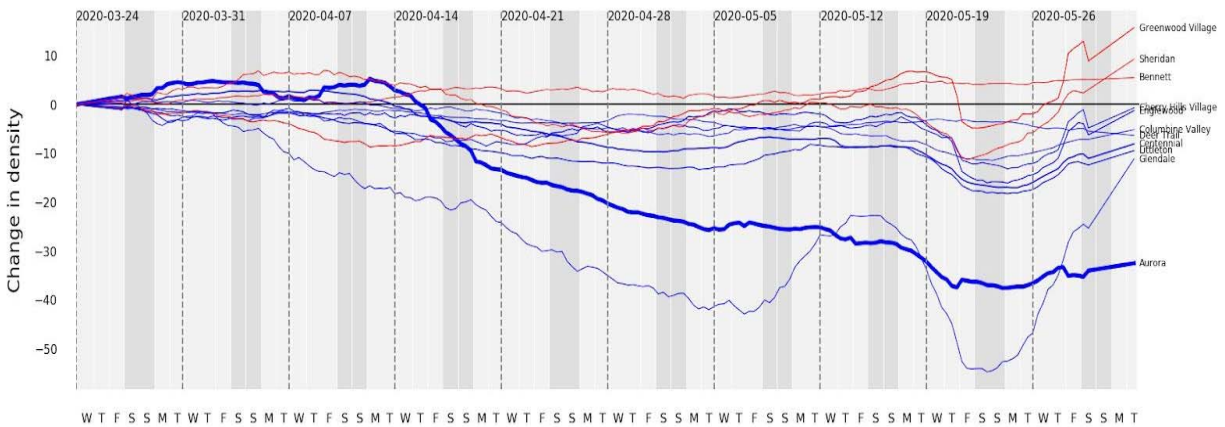
16. Arapahoe County Cuebiq Stay-at-Home Analysis¹⁵

The stay-at-home analysis represents the percentage of users staying at home in Arapahoe County; it is calculated by measuring how many users moved less than 330 feet from home.



17. Facebook Mobility Analysis for Arapahoe County¹⁶

The Facebook population density analysis this week shows an increase in density and therefore a decrease in residents staying at home. Please note: An error in the data was unable to be resolved by the research team that provides the data; that error is the dramatic reduction of density observed on 4/23. Ignoring that error shows that density is increasing.



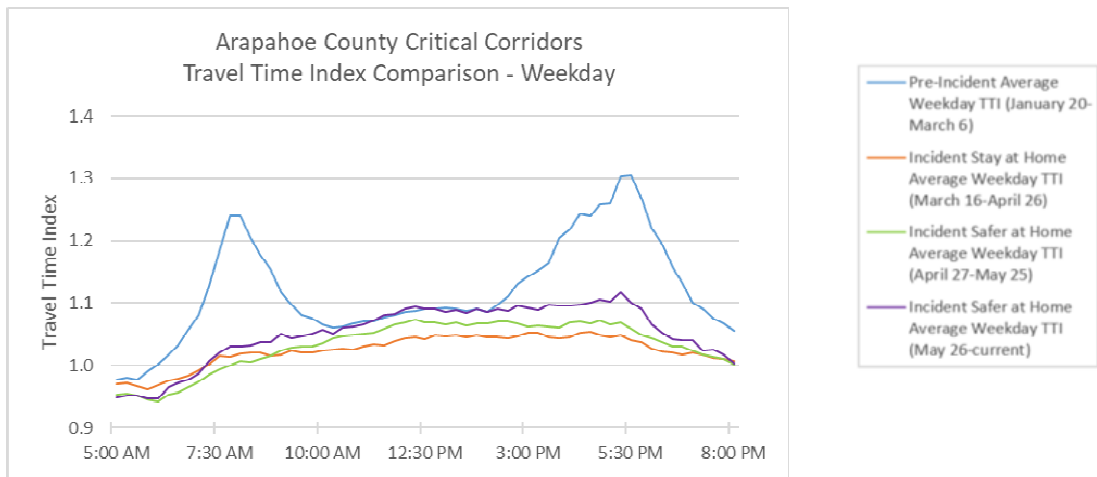
Note: This chart shows the mean density of each 2km x 2km map square “tile” in each city, measured daily. Line thickness corresponds to baseline density. Red lines indicate areas where the density is above the baseline; blue lines indicate areas where the density is below the baseline. The baseline is the black line.

¹⁵ https://www.cuebiq.com/visitation-insights-covid19/?utm_source=covid-outreach&utm_medium=homepage-banner&utm_campaign=covid-19-insights-outreach-2020

¹⁶ Data obtained from University of Colorado, Boulder; Colorado State University, Fort Collins; and National Alliance for Public Safety GIS, Washington, DC

18. Traffic Analysis¹⁷

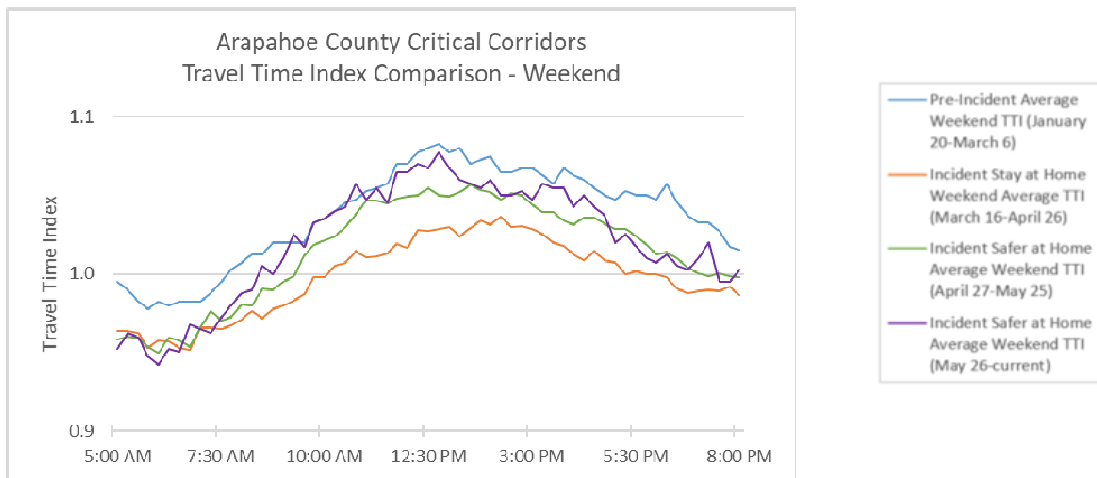
COUNTYWIDE CRITICAL CORRIDORS - WEEKDAYS



TRAFFIC FLOW ANALYSIS – 2020 COVID INCIDENT

June 4, 2020

COUNTYWIDE CRITICAL CORRIDORS - WEEKENDS

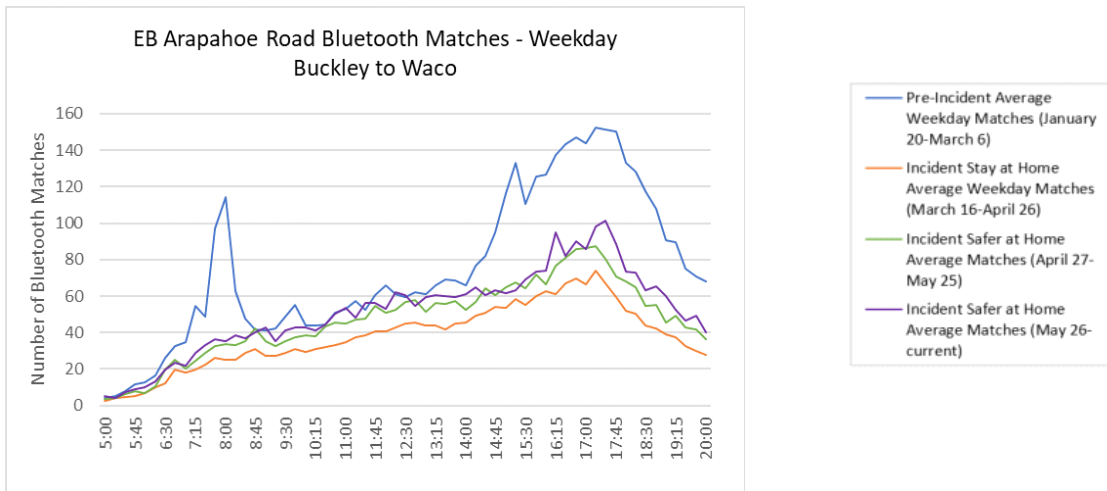


TRAFFIC FLOW ANALYSIS – 2020 COVID INCIDENT

June 4, 2020

¹⁷ Data obtained from Arapahoe County Public Works and Development Department

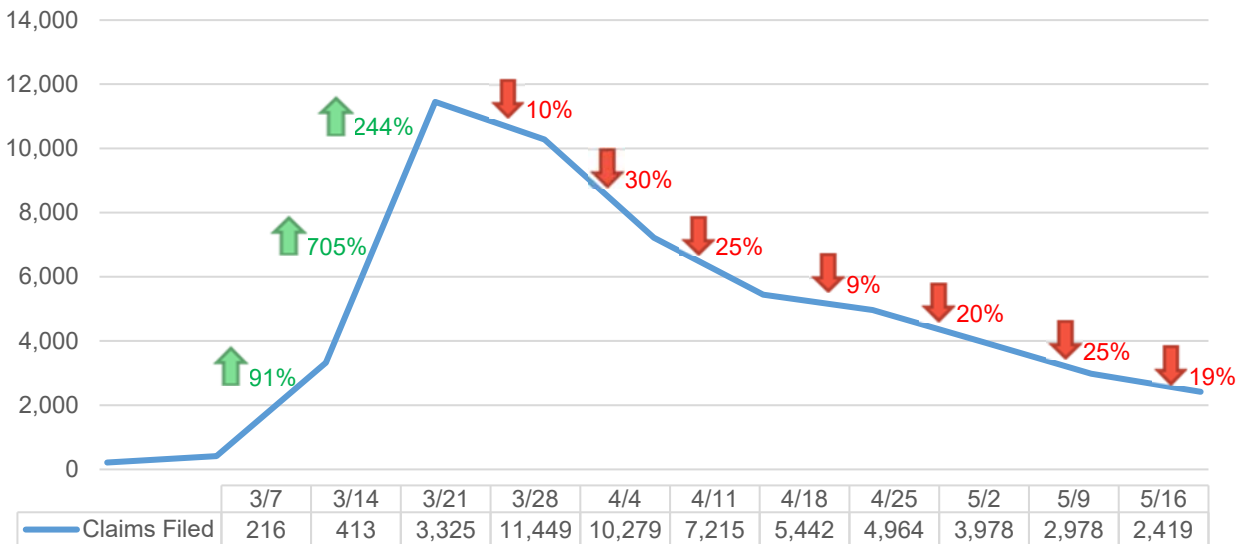
ARAPAHOE ROAD – BLUETOOTH READINGS



TRAFFIC FLOW ANALYSIS – 2020 COVID INCIDENT

June 4, 2020

19. Arapahoe County Unemployment Claims¹⁸



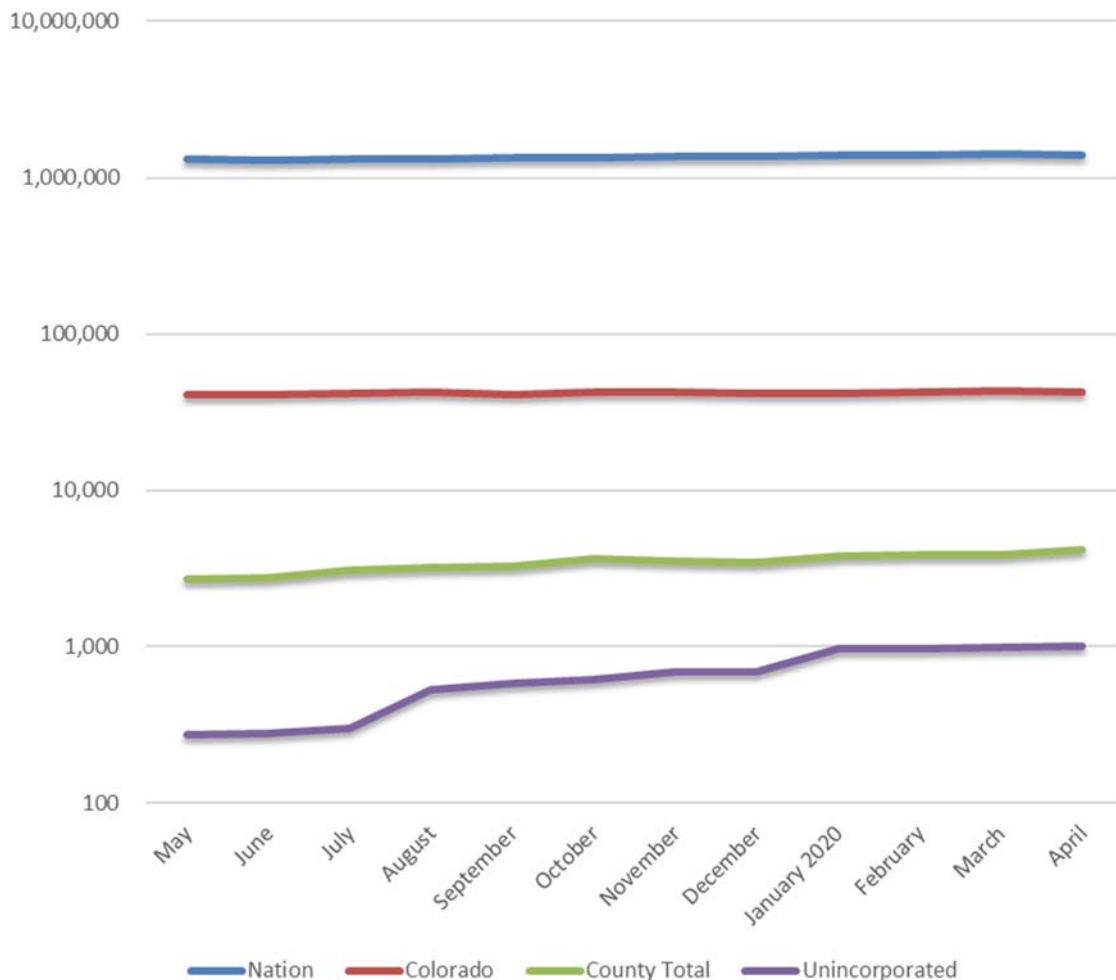
¹⁸ Data obtained from Arapahoe/Douglas Works!

20. Building Permits Issued (Reported Monthly)¹⁹

Note: No changes have been made to this section since the last weekly report.

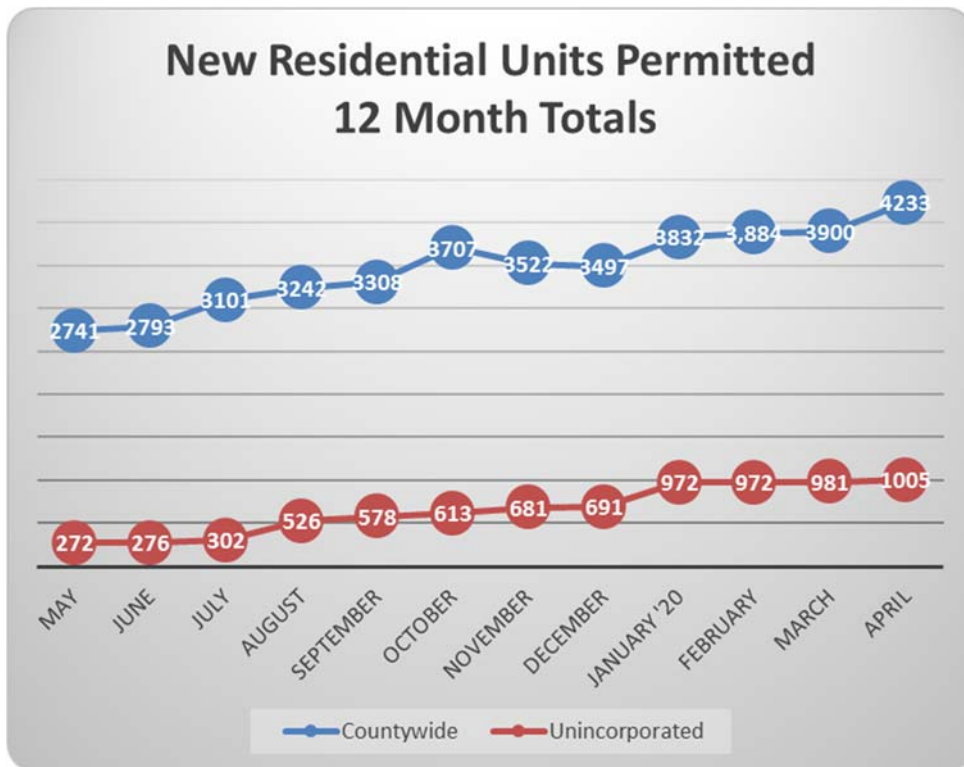
- The U.S. Census Bureau has released their survey of local residential building permits for April. This report provides a summary of Arapahoe County new residential building permits during April 2020.
 - Nationally, privately-owned housing units authorized by building permits were at a seasonally adjusted annual rate of 1,074,000.
 - This is 21% below the revised March rate of 1,356,000 and is 19% below the April 2019 rate of 1,330,000.
- The 12-month running totals provide a comparison for Arapahoe County and the unincorporated area with national and state information.
 - Like the seasonally adjusted numbers, the 12-month running totals for the nation and state were down.
 - The national figure declined by 2%, and the state figure by 1%.
 - The Colorado running total dropped by 435 units. The running total of 42,604 is well below the high in April 2018 of 46,037 units per year.

12-Month Running Totals for New Residential Building Permits



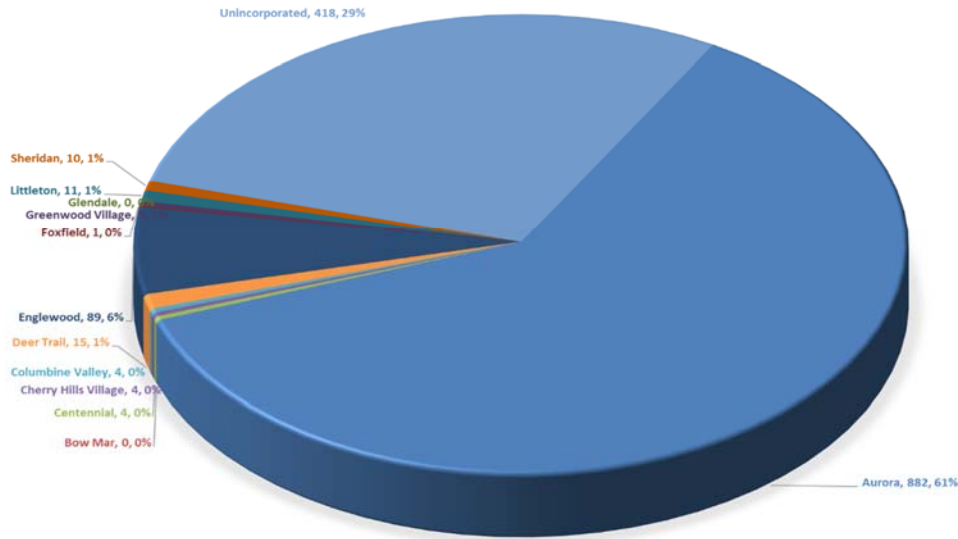
¹⁹ Data obtained from Arapahoe County Public Works and Development Department

- The chart below focuses in on Arapahoe County.
- As noted by the U.S. Census Bureau, many jurisdictions in April were working with limited staff.
 - Where possible, the Bureau estimated permit counts based on past performance.
 - Both the unincorporated area and the countywide figure continued to increase.
 - The unincorporated figure was at 1,005 units and is still the highest it has been since the Arapahoe County Public Works and Development Department compiled this information in 2014.
 - Good April numbers for Aurora, including some apartments units, put the countywide figure at 4,233, which is still well below the high of 4,657 in December of 2016.



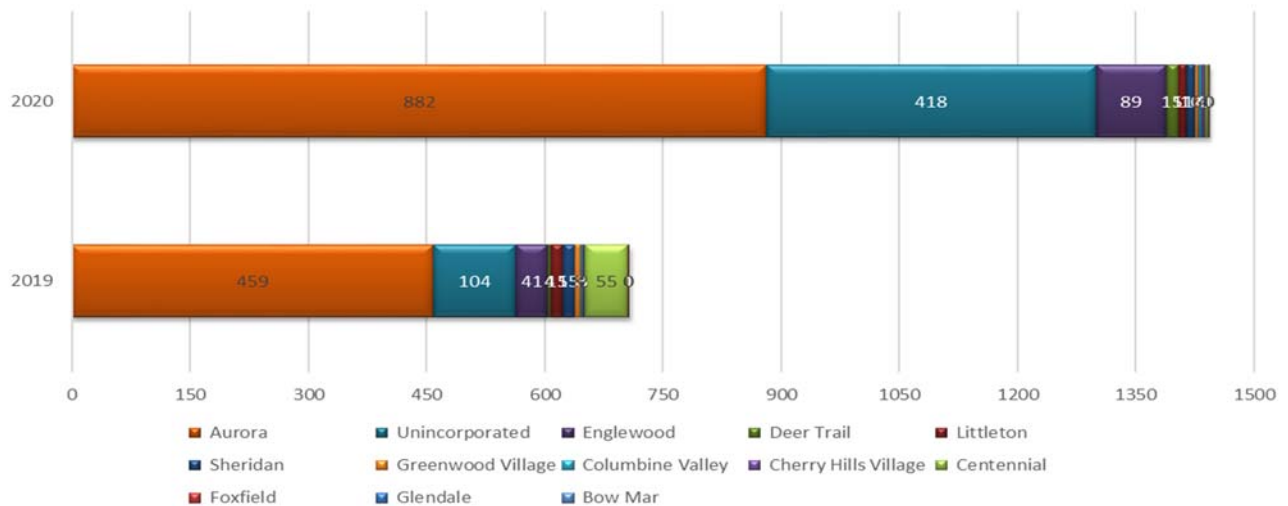
- The chart below shows the units permitted in April 2020 by jurisdiction.
- The Aurora apartments have resulted in the city accounting for 60% of the County units.
- Only the unincorporated area's 484 units and Englewood's 89 units were above 15 units for the year.

NEW RESIDENTIAL UNITS PERMITTED IN 2020 AS OF APRIL



- With the one-third of 2020 complete, we can compare this year to 2019.
 - Through April, the County is at 1,443 new units, compared to 707 in 2019.
 - Aurora and the unincorporated area are driving this doubling from a year ago.
 - The only other jurisdictions that are ahead of their 2019 numbers are Englewood and Deer Trail.
- The Denver metro area is only at 85 percent of its 2019 figure, well behind Arapahoe County.

Units Year to Date as of April

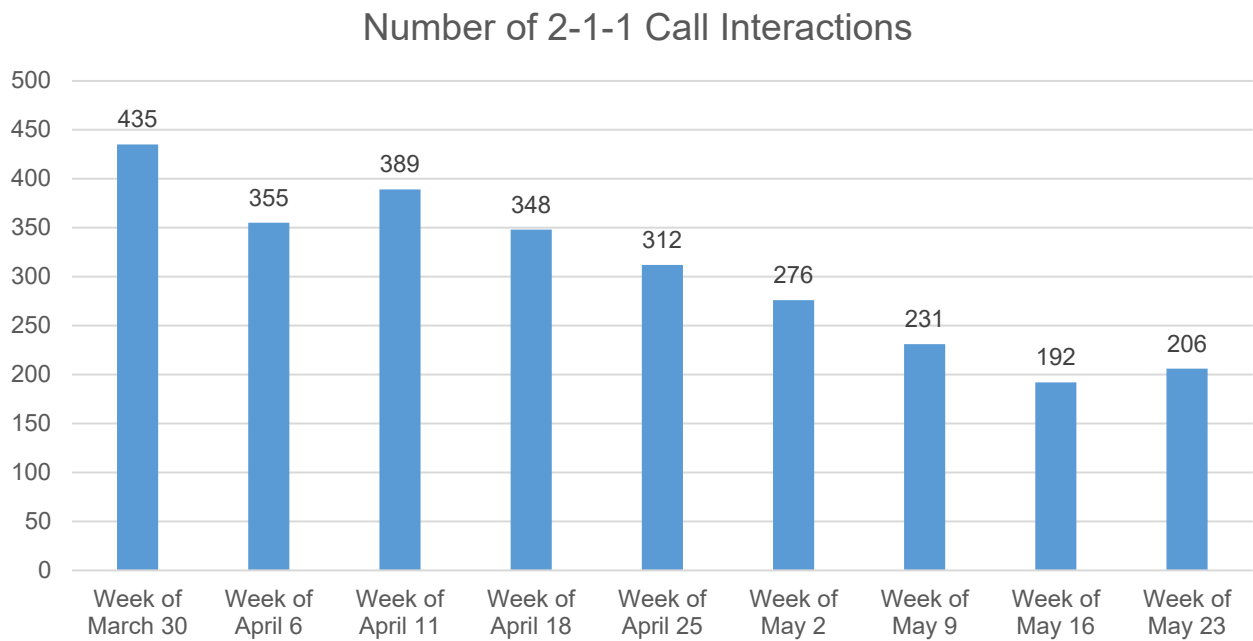


21. Commercial Vacancy Rates²⁰

Indicator	Current* Vacancy Rate	Prior Year Vacancy Rate	% Change
Office	11.54%	10.75%	7% ↑
Retail	5.69%	4.85%	17% ↑
Industrial/Flex	4.56%	3.34%	37% ↑

*Data obtained on June 3, 2020.

22. Arapahoe County 2-1-1 Colorado Calls²¹



Week	Top 5 Presenting Needs	Frequency
3/30/2020	Rent Payment Assistance	254
	Income Support/Assistance	71
	Food/Meals	61
	Utility Assistance	43
	Healthcare	31

²⁰ Data provided by the City of Centennial Economic Development Specialist through CoStar

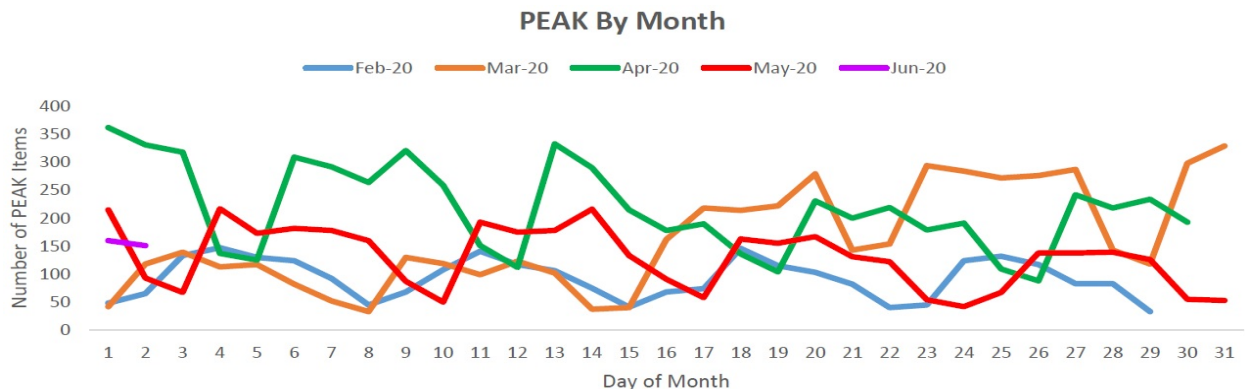
²¹ Data obtained from 2-1-1 Colorado

4/6/2020	Rent Payment Assistance	142
	Food/Meals	97
	Utility Assistance	43
	Income Support/Assistance	41
	Housing	31
4/11/2020	Rent Payment Assistance	140
	Food/Meals	82
	Utility Assistance	54
	Income Support/Assistance	49
	Healthcare	30
4/18/2020	Rent Payment Assistance	140
	Food/Meals	70
	Utility Assistance	52
	Health Care	36
	Income Support/Assistance	31
4/25/2020	Rent Payment Assistance	123
	Food/Meals	63
	Utility Assistance	60
	Income Support/Assistance	31
	Housing	29
5/2/2020	Rent Payment Assistance	96
	Food/Meals	58
	Utility Assistance	48
	Housing	31
	Income Support/Assistance	30

5/9/2020	Rent Payment Assistance	76
	Food/Meals	43
	Utility Assistance	41
	Housing	26
	Income Support/Assistance	19
5/16/2020	Rent Payment Assistance	59
	Food/Meals	47
	Utility Assistance	33
	Health Care	20
	Housing	19
5/23/2020	Rent Payment Assistance	65
	Food/Meals	36
	Utility Assistance	35
	Health Care	30
	Housing	22

23. Arapahoe County Human Services Data²²

PEAK (Program Eligibility and Application Kit) Applications by Month
 PEAK is an online service for Arapahoe County citizens to screen and apply for medical, food, cash, and early childhood assistance programs online. This graph includes new applications, change report forms, and change report forms that are used as new applications.



²² Data provided by the Arapahoe County Human Services Department

Weekly PEAK Items

Week	# of PEAK Items	% Change From First Week in March
3/01/20	663	---
3/08/20	643	-3%
3/15/20	1,278	+93%
3/22/20	1,710	+158%
3/29/20	1,893	+186%
4/05/20	1,721	+160%
4/12/20	1,454	+119%
4/19/20	1,233	+86%
4/26/20	1,283	+94%
5/03/20	1,064	+61%
5/10/20	1,036	+56%
5/17/20	850	+28%
5/24/20	705	+6%

Weekly CO Works Applications

Week	# of PEAK Items	% Change From First Week in March
3/01/20	40	---
3/08/20	54	+35%
3/15/20	137	+243%
3/22/20	190	+375%
3/29/20	177	+343%
4/05/20	165	+313%
4/12/20	109	+173%
4/19/20	113	+183%
4/26/20	88	+120%
5/03/20	76	+90%
5/10/20	80	+100%
5/17/20	62	+55%
5/24/20	65	+63%

Peak Items Year-by-Year

Month	2019 PEAK Items	2020 PEAK Items	Percent Change
February	2,425	2,685*	+11%
March	2,471	5,039	+104%
April	2,563	6,531	+155%

*February 2020 had 29 days.

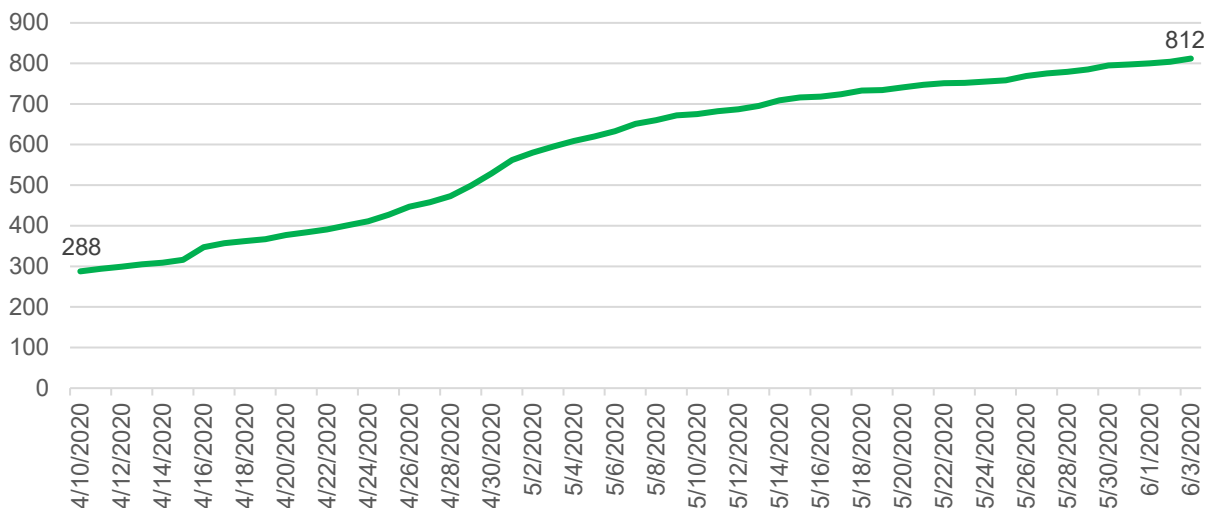
Ongoing Programs by Month

Ongoing Program Type	February	March (% Change from February)	April (% Change from February)
Financial	2,771	2,778 (0%)	2,770 (0%)
Colorado Works	1,119	1,237 (+11%)	1,398 (+25%)
Food Assistance	19,472	20,911 (+7%)	23,794 (+22%)
Medical Assistance	65,187	66,324 (+2%)	71,650 (+10%)
Child Care Assistance	1,387	1,364 (-2%)	1,271 (-8%)
Total Program Count	89,936	92,614 (+3%)	100,883 (+12%)

24. Douglas County Re-Opening Data

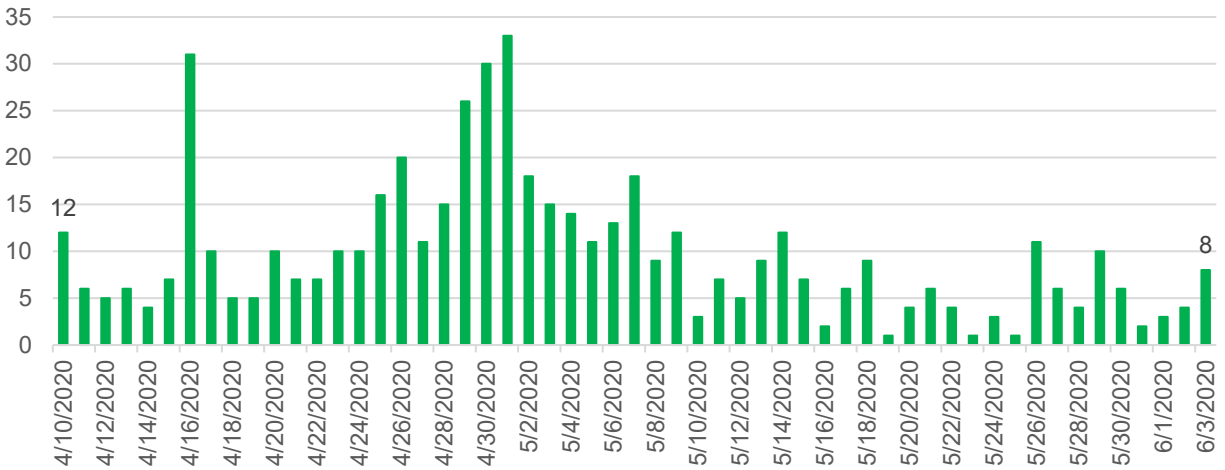
Douglas County transitioned in to the Safer at Home Executive Order issued by the Governor on April 27, 2020. Douglas County case data will be tracked weekly to determine early impacts of re-opening. Thus far, Douglas County has not experienced a significant rise in cases nor hospitalizations since transitioning to Safer at Home.

Douglas County Confirmed Cumulative Cases²³

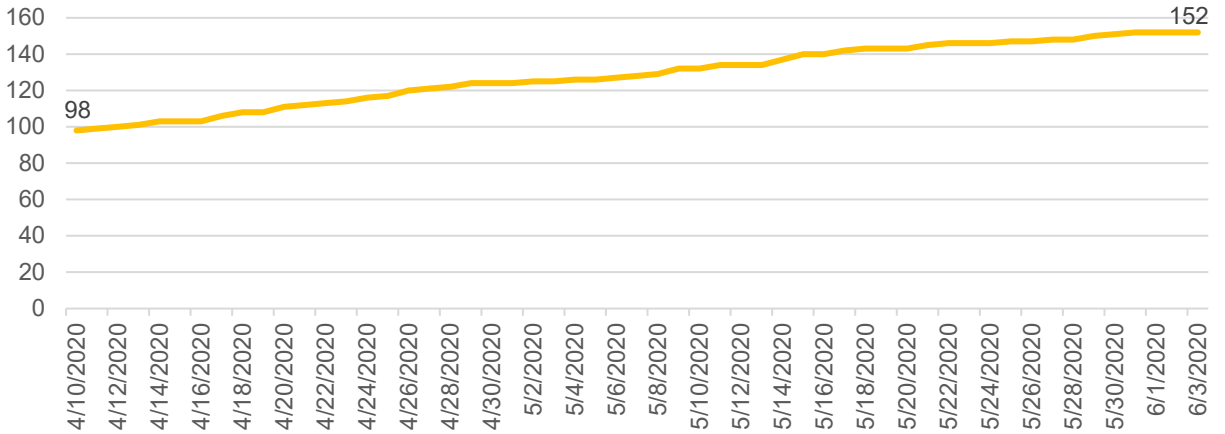


²³ Data obtained from Tri-County Health Department: <https://www.tchd.org/823/Case-Updates>

Douglas County Daily COVID-19 Cases²⁴

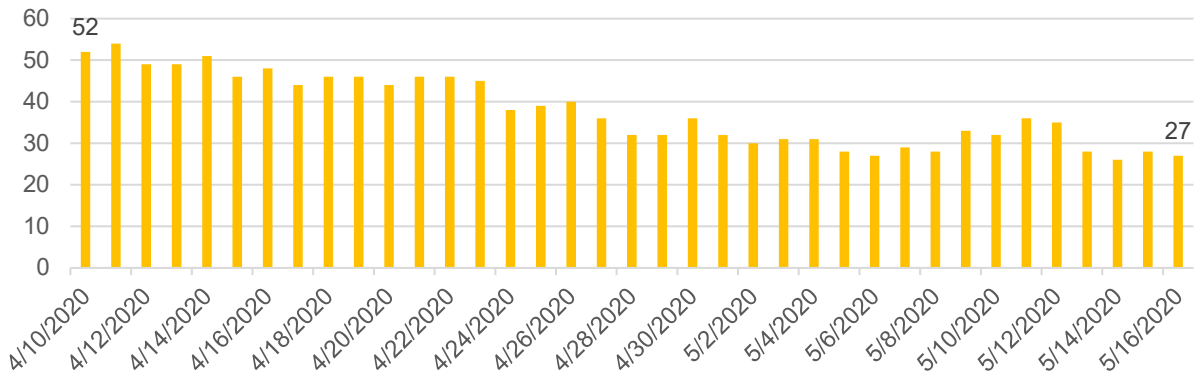


Douglas County Cumulative COVID-19-related Hospitalizations²⁵



Douglas County Daily COVID-19-related Hospitalizations²⁶

Note: No changes have been made to this graph since the last weekly report.



²⁴ Data obtained from Tri-County Health Department: <https://www.tchd.org/823/Case-Updates>

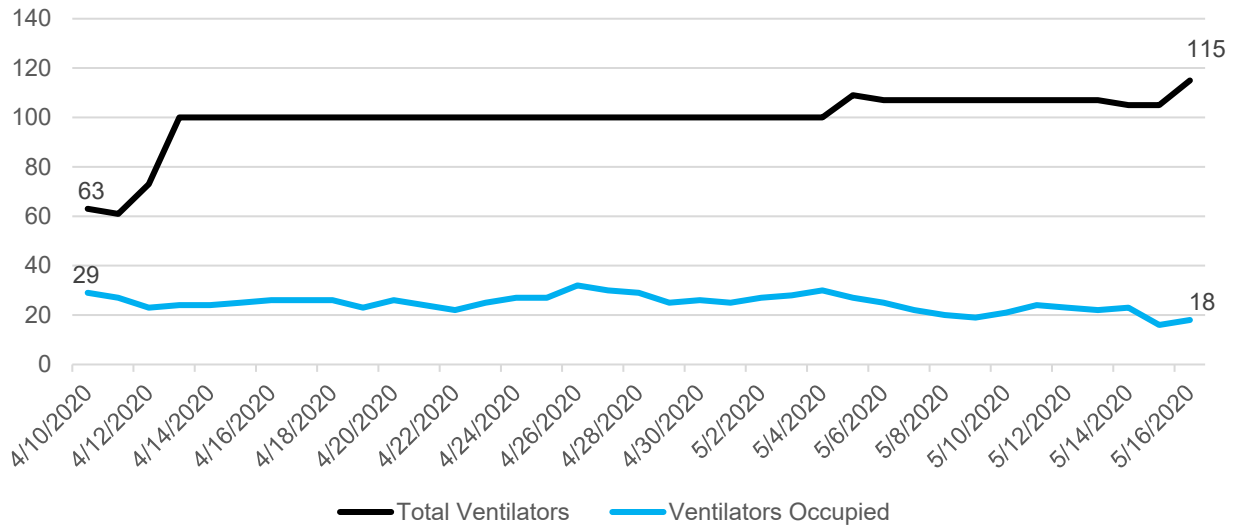
²⁵ Data obtained from North Central Hospital Coalition through EMResource

²⁶ Data obtained from North Central Hospital Coalition through EMResource

Douglas County Ventilator Utilization²⁷

Note: No changes have been made to this graph since the last weekly report.

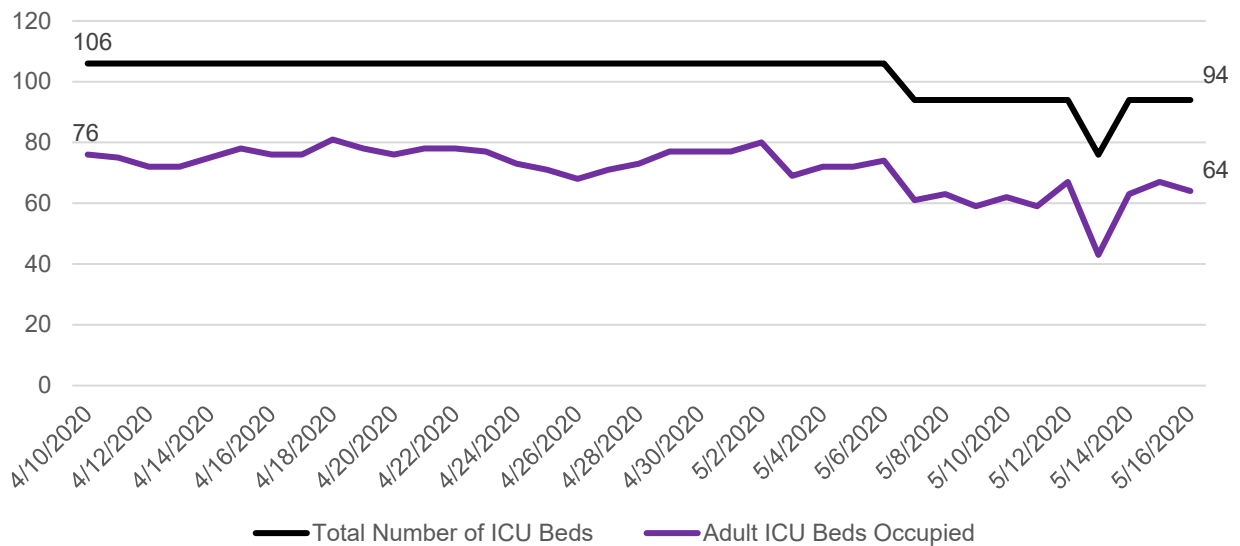
Data include utilization of ventilators for both COVID-19 patients and non-COVID-19 patients



Douglas County ICU Utilization²⁸

Note: No changes have been made to this graph since the last weekly report.

Data include ICU bed utilization for both COVID-19 patients and non-COVID-19 patients



²⁷ Data obtained from North Central Hospital Coalition through EMResource

²⁸ Data obtained from North Central Hospital Coalition through EMResource



ARAPAHOE COUNTY
COLORADO'S FIRST



Attachment D – Arapahoe County Suppression Plan June 2020 – Hospital Letters

This attachment includes letters regarding equipment and capacity capabilities from the 5 hospitals within Arapahoe County. This attachment is part of the Arapahoe County Suppression Plan.



We extend the healing ministry of Christ by caring for those who are ill and by nurturing the health of the people in our communities.

June 10, 2020

VIA EMAIL – mhalstead@arapahoegov.com

Arapahoe County Board of Commissioners
5334 S. Prince Street
Littleton, CO 80120

RE: Littleton Adventist Hospital

Dear Board of Commissioners,

In response to your request for documentation in support of the Arapahoe County Variance to the Amended Safer At Home Public Health Order 20-28, Littleton Adventist Hospital will continue to monitor its available ICU beds and ventilators, and it regularly monitors its supply of personal protective equipment and hospital staff in anticipation of and in preparation for a surge or resurgence of COVID-19 patients. Littleton Adventist Hospital has reviewed the Arapahoe County Suppression Plan and it is prepared to serve COVID-19 patients in Arapahoe County.

Regards,

Centura Health
for Littleton Adventist Hospital

A handwritten signature in blue ink, appearing to read "Kris Ordelheide".

Kris Ordelheide
Senior Vice President
& General Counsel

cc: Jillyan McKinney, President & CEO – Littleton Adventist Hospital
Geoff Lawton, COO – Littleton Adventist Hospital
Alan Verrill, MD, CMO – Littleton Adventist Hospital
Nathan Fogg, Director Emergency Management - NFogg@arapahoegov.com



Administration
501 E Hampden Ave
Englewood, Colorado 80113
303.788.6484 Phone
303.788.6223 Phone
303.788.6269 Fax

On April 26, 2020, Governor Jared Polis issued Executive Order, D 2020 044, Safer at Home (the "**Executive Order**"). Section II.M. of the Executive Order, provides for application for variances for the Executive Order as follows:

"Any county wishing to apply for a local variance from part or all of this Executive Order must submit a written application to CDPHE certifying that the county has low case counts of COVID-19 cases or can document fourteen (14) consecutive days of decline in COVID-19 cases reported in the county. The application must include a written COVID-19 suppression plan approved by the appropriate local public health authority, all hospitals within the county (unless no hospitals are located in the county), and a majority of the county commissioners, or, in the case of the City and County of Denver, the mayor of Denver, or, in the case of the City and County of Broomfield, the city council."

Pursuant to the Executive Order, [HCA Swedish Medical Center] ("**Hospital**") has been asked by [Arapahoe] County ("**County**") to review the County's COVID-19 Suppression Plan with respect to the County's request for a Variance (the "**Variance Request**"), dated 06/10/2020, under the Executive Order.

In reviewing the County's COVID-19 Suppression Plan, and except as expressly set forth below, Hospital assumes the completeness and accuracy of all facts and assumptions set forth in the Variance Request; however, Hospital does not provide an opinion with respect to the accuracy or completeness of such facts or assumptions. Hospital is also expressly relying on completeness and accuracy of data for current and estimated rates of infection and hospitalizations in and around the County's primary service area provided to Hospital by the County and the Colorado Department of Public Health and Environment ("**CDPHE**") Finally, Hospital does not opine on the secondary effect of people traveling to or from the County's primary service area to other locations in the State or nationally.

Based on the foregoing assumptions:

1. Hospital currently has 93 ICU beds available and such ICU beds are sufficient for Hospital to provide its usual and customary care for COVID-19 patients based on the current infection data;
2. Hospital currently has 72 ventilators available and such ventilators are sufficient for Hospital to provide its usual and customary care for COVID-19 patients based on current infection data;
3. Hospital has adequate personal protective equipment ("**PPE**") to provide its usual and customary care for COVID-19 patients based on current infection data; and
4. Hospital has adequate levels of hospital staff to provide its usual and customary care for COVID-19 patients based on current infection data.

Based solely on the foregoing, and subject to the qualifications and limitations set forth herein, Hospital believes that it can provide the services as set forth in the County's COVID-19 Suppression Plan. Hospital believes that both the County and CDPHE should actively monitor the accuracy of, and any changes to, the assumptions and facts set forth in the Variance Request. Hospital shall update the County and CDPHE if the facts set forth in #1-4 above materially and adversely change.

A handwritten signature in black ink, appearing to be a stylized name, possibly "J. Polis" or similar, written over a horizontal line.



The Medical Center of Aurora
1501 S. Potomac Street
Aurora, CO 80012

Spalding Rehabilitation Hospital
900 Potomac Street
Aurora, CO 80011

On April 26, 2020, Governor Jared Polis issued Executive Order, D 2020 044, Safer at Home (the "**Executive Order**"). Section II.M. of the Executive Order, provides for application for variances for the Executive Order as follows:

"Any county wishing to apply for a local variance from part or all of this Executive Order must submit a written application to CDPHE certifying that the county has low case counts of COVID-19 cases or can document fourteen (14) consecutive days of decline in COVID-19 cases reported in the county. The application must include a written COVID-19 suppression plan approved by the appropriate local public health authority, all hospitals within the county (unless no hospitals are located in the county), and a majority of the county commissioners, or, in the case of the City and County of Denver, the mayor of Denver, or, in the case of the City and County of Broomfield, the city council."

Pursuant to the Executive Order, The Medical Center of Aurora has been asked by Arapahoe County to review the County's COVID-19 Suppression Plan with respect to the County's request for a Variance (the "**Variance Request**"), April 26, 2020, under the Executive Order.

In reviewing the County's COVID-19 Suppression Plan, and except as expressly set forth below, Hospital assumes the completeness and accuracy of all facts and assumptions set forth in the Variance Request; however, Hospital does not provide an opinion with respect to the accuracy or completeness of such facts or assumptions. Hospital is also expressly relying on completeness and accuracy of data for current and estimated rates of infection and hospitalizations in and around the County's primary service area provided to Hospital by the County and the Colorado Department of Public Health and Environment ("**CDPHE**") Finally, Hospital does not opine on the secondary effect of people traveling to or from the County's primary service area to other locations in the State or nationally.

Based on the foregoing assumptions:

1. Hospital currently has 38 ICU beds available and such ICU beds are sufficient for Hospital to provide its usual and customary care for COVID-19 patients based on the current infection data;
2. Hospital currently has 16 ventilators available and such ventilators are sufficient for Hospital to provide its usual and customary care for COVID-19 patients based on current infection data;
3. Hospital has adequate personal protective equipment ("**PPE**") to provide its usual and customary care for COVID-19 patients based on current infection data; and
4. Hospital has adequate levels of hospital staff to provide its usual and customary care for COVID-19 patients based on current infection data.

Based solely on the foregoing, and subject to the qualifications and limitations set forth herein, Hospital believes that it can provide the services as set forth in the County's COVID-19 Suppression Plan. Hospital believes that both the County and CDPHE should actively monitor the accuracy of, and any changes to, the assumptions and facts set forth in the Variance Request. Hospital shall update the County and CDPHE if the facts set forth in #1-4 above materially and adversely change.

Sincerely,

Ryan Simpson
CEO & President



ARAPAHOE COUNTY
COLORADO'S FIRST



Attachment E – Letters from Tri-County Health Department and municipalities

This attachment includes letters of support from Tri-County Health Department and municipalities within the county.



June 9, 2020

Commissioner Nancy Sharpe
Arapahoe County Board of County Commissioners
5334 S. Prince Street
Littleton, CO 80120

Dear Commissioner Sharpe,

Tri-County Health Department has reviewed your variance application for indoor malls, restaurants, houses of worship, and gyms and supports each request. Arapahoe County's viral transmission as measured by new cases and hospitalizations has been declining even as testing has been increasing, and we believe that these variances provide a gradual opening supporting businesses and employees, while protecting the public's health.

We will continue to monitor and provide regular updates to the Board, and will immediately notify you if we have cause for concern. Thank you for your partnership throughout this response.

Regards,

A handwritten signature in black ink that reads "Jennifer L. Ludwig".

Jennifer L. Ludwig
Deputy Director



Mayor Stephanie Piko

City Council

District 1
Candace Moon
Kathy Turley

District 2
Tammy Maurer
Christine Sweetland

District 3
Richard Holt
Mike Sutherland

District 4
Marlo Alston
Don Sheehan

June 8, 2020

Governor Jared Polis
State Capitol Building
200 E. Colfax Ave, Suite 136
Denver, CO 80203

Executive Director Jill Hunsaker Ryan
Colorado Department of Public Health & Environment
4300 Cherry Creek South Drive
Denver, CO 80246

RE: Arapahoe County Request for a Variance from the Safer At Home Executive Order & Public Health Order

Dear Governor Polis and Director Ryan,

The City of Centennial supports Arapahoe County's variance requests for restaurants, places of worship, gyms, and indoor malls. The City believes after careful review of the proposed suppression plan, the State Department of Health will concur with the Tri County Health Department's findings that the proposed alternative restrictions for these industries meet the intent of the Safer at Home in the Vast Outdoors Order.

Arapahoe County and the communities within represent the third-most populous county in Colorado and one of the most diverse. Our local businesses are critical economic engines for metro Denver and the state. Safely reopening the county in a phased manner, guided by local data and monitoring systems is critical to ensure the emotional and economic health of our communities.

The state is aware of the mental stress this event is placing on the citizens of Colorado. The more safe opportunities we find for people to find community the better off the people will be. We need to allow people to begin returning to places of worship and allowing for exercise. We also need to help our restaurants which serve as another form of community anchor. So many have stepped up to help our communities, we have an obligation to make every effort to help them if it can be done safely.



Mayor Stephanie Piko

City Council

District 1
Candace Moon
Kathy Turley

District 2
Tammy Maurer
Christine Sweetland

District 3
Richard Holt
Mike Sutherland

District 4
Marlo Alston
Don Sheehan

We appreciate your consideration and cooperation in helping Arapahoe County safely open additional opportunities for our community while simultaneously applying appropriate restrictions to help prevent the spread of COVID-19.

Sincerely,

A handwritten signature in black ink that reads "Stephanie Piko".

Stephanie Piko, Mayor
City of Centennial



City of Sheridan
4101 S. Federal Blvd.
Sheridan, CO 80110-5399

303/762-2200
FAX 303/788-1853

June 9, 2020

Governor Jared Polis
State Capitol Building
200 E. Colfax Ave, Suite 136
Denver, CO 80203

Executive Director Jill Hunsaker Ryan
Colorado Department of Public Health & Environment
4300 Cherry Creek South Drive
Denver, CO 80246

RE: Arapahoe County Request for a Variance from the Safer At Home Executive Order & Public Health Order

Dear Governor Polis and Director Ryan,

At the direction of the Mayor and City Council of the City of Sheridan (City), I am writing in support of Arapahoe County's variance requests for restaurants, houses of worship, gyms, and indoor malls. The City believes after careful review of the proposed suppression plan, the State Department of Health will concur with the Tri County Health Department's findings that the proposed alternative restrictions for these industries meet the intent of the Safer at Home Order.

Arapahoe County and the communities within represent the third-most populous county in Colorado and one its most diverse. Our local businesses are critical economic engines for metro Denver and the state. Safely reopening the county in a safe and phased manner, guided by local data and monitoring systems is critical to ensure the emotional and economic health of our communities.

We appreciate your consideration and cooperation in helping Arapahoe County safely open additional opportunities for our community while simultaneously applying appropriate restrictions to help prevent the spread of COVID-19.

Sincerely,

A handwritten signature in blue ink that reads "C. Devin Granbery". The signature is fluid and cursive, with a long horizontal stroke at the end.

C. Devin Granbery, City Manager
City of Sheridan



ARAPAHOE COUNTY
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Attachment F – Gyms Variance Request

1. List the sections of Executive Order D 2020 091 and/or Sixth Amended Public Health Order 20- 28 that a variance is being sought for.

Arapahoe County requests a variance to the following provision in Sixth Amended Public Health Order 20-28 as amended on June 5, 2020 (the “Order”), Section I.H.2.d, allowing “g²o²o² to open, to up to 25% capacity, or 50 people, whichever is less, per room maintaining 6 feet distancing.”

Arapahoe County proposes to allow Gyms to open to 50% of the posted occupancy code with people spaced 6 feet apart, ensuring a minimum of 28 sq. ft. per person, subject to the following restrictions.

Arapahoe County proposes that the variance take effect on June 10, 2020, or as soon as possible.

2. Summarize alternate restrictions being proposed to replace the above-referenced restrictions and indicate where in the Plan these alternate restrictions are addressed.

- All gyms shall adhere to the requirements listed in Section II.I and Appendix A of PHO 20-28 (sixth amendment).
- Occupancy of the facility shall be limited to 50% of the posted occupancy code with people spaced 6 feet apart, ensuring a minimum of 28 sq. ft. per person.
- All staff are required to wear face coverings or masks at all times.
- Customers should be encouraged to wear a face covering both when entering the facility and while in the facility, unless a face covering inhibits the participant’s ability to participate in the fitness activity.
- Close off a sufficient amount of equipment such that at least 6 feet of distance can be maintained between individuals.
- Except for members of a single household, sharing equipment is discouraged.
- Require customers to disinfect equipment after every use or require employees to disinfect shared equipment between customers’ uses.
- Sport courts shall be limited to 50% capacity and users from separate households must maintain 6 feet of distance.
- Pools (indoor and outdoor), hot tubs, and shared spaces shall be limited to 50% capacity.
- Take steps, such as closing off a series of lockers, to promote physical distancing and reduce gatherings in restrooms, showers, and locker rooms.
- Drinking fountains and similar water dispensers shall be open, with regular cleaning.

² Gym as defined in Section III.F means a building or room used for indoor sports or exercise, such as fitness, dance, exercise or group classes, exercise studios and centers, recreation centers, bowling alleys, pools, and other indoor athletic facilities.



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- An employee at the entrance(s) and entrance to all rooms to ensure that the maximum number of customers is not exceeded.
- Perform frequent environmental cleaning and disinfection of lavatories and high-touch surfaces.
- Limit operating hours for additional deep cleaning.
- Implement mobile sign-in, reservation, and payment procedures.
- Signage at each entrance of the facility or location notifying customers and employees to stop if they are sick and ask them not to enter.
- Ask customers to exclude themselves from using the facility if they are experiencing symptoms of any illness.
- Remove furniture from, or close off, lobby or public gathering areas.
- Place tape or other markings at least 6 feet apart in customer line areas and on sidewalks to public entrances with signs directing customers to use the markings to maintain distance.
- Signs shall be posted at entrances and throughout the facility as needed to remind customers of face coverings, social distancing, and proper hygiene guidelines.
- Implement one-way entry/exit, and directional walkways as much as possible.
- Prop entry doors open as much as possible to reduce touchpoints.



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Attachment G – Restaurants Variance Request

1. List the sections of Executive Order D 2020 091 and/or Sixth Amended Public Health Order 20- 28 that a variance is being sought for.

Arapahoe County requests a variance to Section II.C.1 of the Sixth Amended Public Health Order 20-28 as amended on June 5, 2020 (the “Order”) limiting “in-person dining at 50% of the indoor posted occupancy code limit, not to exceed 50 people, whichever is less.”

Arapahoe County proposes to allow restaurants to offer food or beverage for on-premises consumption up to 50% of the posted occupancy code with patrons spaced 6 feet apart between seats at different tables, subject to the following restrictions.

Arapahoe County proposes that the variance take effect on June 10, 2020, or as soon as possible.

2. Summarize alternate restrictions being proposed to replace the above-referenced restrictions and indicate where in the Plan these alternate restrictions are addressed.

- Restaurants must adhere to all requirements of Appendix I, excluding 2.a of the PHO 20-28 (sixth amendment)
- Restaurants must adhere to the requirements listed in Section II.I and Appendix A of PHO 20-28 (sixth amendment).
- Total occupancy of customers within an indoor setting shall be limited to 50% of the posted occupancy code, ensuring a minimum of 6 feet between seats at different tables.
- Tables or groups must be limited to no more than 8 people.
- Spread people/tables out so there is at least 6 feet distance between individuals not at the same table.
- Seating at bars shall be prohibited unless 6 feet of spacing can be maintained between groups of customers and preparation areas are separated from customers by at least 6 feet. Walk up service at bars is prohibited.
- Using markings on the floor, layout routes for individuals to follow when moving through the restaurant so as to minimize the possibility of encroaching on 6-foot social distancing.
- Do not allow customers to congregate in the lobby area or outside the doors in a manner that prevents 6-foot separation between groups.
- Encourage a reservation system and its use by all customers.
- Encourage customers socially distance outside to wait in their cooled vehicles or outdoors in social distance spacing while waiting to be seated.
- Encourage notification system for customers via text or phone call when their table is ready.
- Customers are strongly encouraged to wear cloth face coverings in order to enter the business, and to keep their face coverings in place until they've reached their table.



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- Tables may be pre-set immediately before customers are seated.
- Ask customers if they are experiencing any symptoms prior to seating them in the dining area. If they are, do not allow them to enter.
- Post signage that restaurants shall have the right to deny service to any guests exhibiting COVID-19 symptoms.
- Implement touchless payment methods when possible.
- Prioritize outdoor seating to the greatest extent possible.
- Place signage or staff outside the restaurant instructing walk-up customers to utilize the reservation system or to send only one member of the party to the reservation stand or counter.
- Post signs at entrances regarding face coverings, and post signs throughout the facility as needed to remind the customers of social distancing and proper hygiene guidelines.
- Implement one-way entry/exit, and directional walkways as much as possible.
- Consider options for dine-in customers to order ahead of time to limit the amount of time spent in the establishment.



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Attachment H – Houses of worship Variance Request

1. List the sections of Executive Order D 2020 091 and/or Sixth Amended Public Health Order 20- 28 that a variance is being sought for.

Arapahoe County requests a variance to Section II.M. of the Sixth Amended Public Health Order 20-28 as amended on June 5, 2020 (the “Order”) allowing “houses of worship may open to 50% of the posted occupancy limit indoors not to exceed 50 people, whichever is less, while meeting the 6 feet distancing requirements in every direction between non-household members. Any additional rooms in the house of worship may host up to 10 people implementing 6 feet distancing requirements.”

Arapahoe County proposes to allow Houses of Worship to open to 50% of the posted occupancy code with people spaced 6 feet apart, ensuring a minimum of 28 sq. ft. per person, subject to the following restrictions.

Arapahoe County proposes that the variance take effect on June 10, 2020, or as soon as possible.

2. Summarize alternate restrictions being proposed to replace the above-referenced restrictions and indicate where in the Plan these alternate restrictions are addressed.

- Houses of worship shall meet the requirements of Section II.I of PHO 20-28 (sixth amendment).
- Houses of worship should follow the Colorado Department of Health and Environment Cleaning Guidance, as well as the CDC guidelines for Cleaning and Disinfecting Your Facility in preparing their buildings prior to, during, and following any gathering.
- Indoor houses of worship can open to 50% of the posted occupancy code per room, with people spaced 6 feet apart, ensuring a minimum of 28 sq. ft. per person.
- Outdoor worship services must maintain 6 feet distance between non-household members and work with the appropriate local authority to obtain approval for the maximum number of individuals who may attend in the designated outdoor space.
- Require staff, volunteers and congregants to wear face coverings, except where doing so would compromise an individual’s health.
 - Staff and volunteers may remove face masks during service when not in close proximity to others, for instance, during a sermon, prayer, or musical performance.
 - Congregants are strongly encouraged to wear face coverings during the duration of the service but may consider removing masks when seated at least 6 feet away from other groups during service.
- Operate with required 6 feet physical distancing practices, which may limit capacity further than stated above:
 - Establish appropriate social distancing between families throughout the facility, for instance, place a minimum of 3 chairs between groups and close off every other aisle. Groups shall consist only of members of a single household.
 - In restrooms with multiple sinks and stalls, mark some facilities as closed to ensure social distancing is practiced in restrooms.



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- Speakers, preachers, presenters, and singers should move considerably further back (25-27 feet) than the prescribed 6 feet of physical distance to maximize distance between them and the front row of attendees.
 - Those participating in the leadership of the service, including, but not limited to clergy, staff, musicians and volunteers shall stand at least 6 feet apart during performances.
 - Choirs should not be used at this time given the strong risk of viral spread from singing
 - Designate a one-way entry/exit at doors and aisles where possible.
 - Place markings on floors to maintain at least 6 feet distance where lines might form.
 - Do not allow guests to wait or congregate in the lobby area or parking lot before or after services.
- Utilize chlorinated water for any baptism facilities.
 - Communion elements will be distributed by designated individuals with gloves and masks.
 - No distribution of food, beverages or materials will occur.
 - Remove all materials, including books, envelopes and pens, from pews/chairs.
 - Utilize stationary receptacles for receiving offerings to avoid passing materials amongst attendees.
 - Staff and volunteers will monitor and provide controls to ensure social distancing is practiced at time of dismissal, for instance, dismiss one row at a time.
 - Require contact information to implement contact tracing protocols if an outbreak occurs.
 - Offer more frequent service options where possible to decrease attendance density.
 - Families are encouraged to stay together during services; childcare facilities can open consistent with established guidance from the Colorado Department of Public Health & Environment.
 - Question congregants before entering facility if they are experiencing COVID-19 symptoms.
 - Ask people to stay home and watch online if they are experiencing symptoms.
 - Post signs at entrances and throughout the facility as needed to remind guests of face covering recommendations, social distancing and proper hygiene guidelines.
 - Entrance and exit doors can be propped open or managed by designated individuals to limit touchpoints.
 - Provide sanitizing stations throughout the facility and frequent cleaning/disinfection between services.
 - Close the facility and disinfect it if a staff person, volunteer or congregant is discovered to be COVID-19 positive.



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Attachment I – Indoor Malls Variance Request

1. List the sections of Executive Order D 2020 091 and/or Sixth Amended Public Health Order 20-28 that a variance is being sought for.

Arapahoe County requests a variance from Appendix A, III. of the Sixth Amended Public Health Order 20-28 as amended on June 5, 2020 (the “Order”) prohibiting “indoor malls must not open to the public for entry.”

Arapahoe County proposes to allow the county’s only indoor mall – The Town Center of Aurora – to open for in-person retail activities. Individual tenants shall be subject to Section II, Section II.I, and Appendix A of PHO 20-28 (sixth amendment). Also included is the mall’s site-specific plans for reference and review.

Arapahoe County proposes that the variance take effect on June 10, 2020, or as soon as possible.

2. Summarize alternate restrictions being proposed to replace the above-referenced restrictions and indicate where in the Plan these alternate restrictions are addressed.

- Individual tenants within indoor mall facilities shall adhere to the requirements listed in Section II, Section II.I and Appendix A of PHO 20-28 (sixth amendment).
- Employees of the indoor mall operator shall adhere to the requirements listed in Section II.H.1, Section II.I, and Appendix A of PHO 20-28 (sixth amendment).
- Limit daily visitors to 30% of building capacity, utilizing a ratio of one person per 55 square feet of physical space.
- Reduce operational hours to 11 a.m. – 7 p.m. Monday – Saturday and 12 p.m. – 6 p.m. Sunday to ensure thorough cleaning.
- Consider offering special hours of operation for vulnerable individuals and encourage vulnerable individuals to use those hours.
- Implement a COVID-19 addendum to existing Code of Conduct expectations for guests, tenants, and employees, posting information throughout facility.
- Post signage at each entrance of the facility or location notifying customers and employees to stop if they are sick and ask them not to enter.
- Post signage at entrances to encourage use of face coverings by all customers, consistent with CDC guidelines.
- All employees must wear masks when interacting with customers or other employees.
- Post signs throughout the facility as needed to remind the customers of social distancing requirements.
 - Label entrance and exit doors to encourage one-way traffic throughout facility
 - Place tape or other markings at least 6 feet apart in customer line areas inside the mall common areas, retail stores, and on sidewalks to public entrances with signs



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directing customers to use the markings to maintain distance.

- Store queuing markers will be placed at all store entrances and throughout the facility.
- No merchandise, signs, or displays allowed in common areas to keep walkways completely open.
- Hand sanitizer is available at entrances and high-traffic locations for use by employees and customers.
- Eliminate all seating areas from common areas within the facility, except for food hall consistent with Appendix I.
- Close play area, experiential vending, and drinking fountains within the facility.
- Limit on-premise consumption of food and beverages within food hall, consistent with the social distance and safety measures listed in Appendix I, with the exception of I.A.2. Management shall monitor and ensure adequate social distancing occurs in the food hall.
- Utilization of the high touch surface cleaning protocol following the 20/60/90/120/240-minute cleaning rotation.
 - Cleaning and disinfection procedures for public restrooms that follow the 20/60/90/120/240-minute cleaning rotation, which involves cleaning and sanitizing high touch surfaces including but not limited to, stall doors, toilet seats and handles, door and furniture handles, water faucet handles, and flooring.
 - Management shall display signage, if necessary, to ensure that customer traffic flow into and out of restrooms allows for compliance with social distancing protocols in restrooms.
 - Management should consider closing every other sink and stall to ensure distancing can be maintained at all times.
- Mall staff or security officers will monitor the interior facility using a zone-based assignment process, checking pedestrian traffic flow, common areas, service entries, and restrooms on consistent basis. Officers will initiate contact with groups observed to be standing idle/gathering in common areas and reminded of the social distancing protocols and politely asked to disperse.
 - Should any interaction with customers involve non-compliance with the Safer at Home guidelines, mall staff or security officers will politely attempt to have the customer observe the protocols adopted by the mall.
 - If there is an issue with compliance, then it will be explained that further patronage will not be permitted, and non-complying customers will politely be asked to depart the center.
 - If any instance becomes criminal in nature, such as non-compliance to depart



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resulting in trespassing, then mall management staff will consult with the local police agency for assistance in gaining compliance or to enforce local public safety ordinances.

- Contactless solutions are implemented whenever possible (i.e. propping entrances open to encourage touch-free experience). If this is not feasible, then regular sanitation procedures are in place.
- Tenants shall have a social distancing plan in place prior to opening that is submitted to management and visibly displayed by stores.
- Post signs that provide proper hygiene guidelines; signs will be posted in all bathrooms, all entrances and dock doors and throughout the facility.
- Post signage explaining cleaning/health measures that have been taken throughout the facility.
- Information regarding all requirements will be distributed to all mall employees and tenants.
- Disinfecting wipes that are effective against COVID-19 are available near shopping carts and shopping baskets and/or an employee is assigned to disinfect carts and baskets regularly.
- If this cannot be achieved, then all carts and baskets will be removed and out of use.
- Plexi-glass protectors or shields are used to limit customer and employee contact where possible.
- All businesses are encouraged to continue Providing curb-side drop-off/pick-up of products to decrease the number of people entering the facility:
 - Parking stalls are clearly signed and numbered and way finding signs are posted.
 - Traffic shall be structured to flow in a manner that mitigates congestion points.
 - Curb-side pickup shall be located away from entrances and must be organized in an orderly and controlled manner with a directional flow of cars.

WASHINGTON
PRIME GROUP

REOPENING REQUEST

for **TOWN CENTER AT AURORA**

Aurora, Colorado | May 29, 2020



YOUR
HEALTH + SAFETY
IS OUR TOP
PRIORITY.

REQUEST

The Town Center at Aurora has implemented best practices and requested safety measures as available from health authorities such as the CDC, Tri-County Health Department, City of Aurora and Colorado.

As a key business for our community, Town Center at Aurora requests the opportunity to open our doors. Local businesses are essential to the well being of our community. The following document details Town Center at Aurora's willingness to meet or exceed the health standards that have been requested from the rest of the retail sector.

Thank you for your time and consideration.



WASHINGTON PRIME GROUP

The coronavirus pandemic, beyond the devastating global health consequences, has inflicted unprecedented, social, psychological and economic hardship upon all of us. While nearly impossible to glean any positive consequences, I've actually witnessed acts which serve as a testament to the compassion of my WPG colleagues as their collective response to this national emergency has been a source of inspiration. Our focus to serve as a community resource has manifested itself via philanthropic, operational and financial measures all of which exhibit our singularly focused objective of serving our demographic constituencies.

For instance, WPG Cares has performed ~175 community service projects (view highlights [here](#)) including serving as distribution centers for medical supplies, the hosting of COVID-19 testing stations, providing space for food depository as well as other important immediate response actions. Our Open for Small Business initiative (view website [here](#)) in conjunction with the University of Chicago's Clinic on Entrepreneurship and faculty including Nobel Laureate Richard Thaler, *Freakonomics* author Steven Levitt and Institute Director Elizabeth Kregor has been proactive regarding such measures as standardization of a universal lease modification agreement. In addition, we have hosted various educational webinars on such topics as accessing Small Business Administration and other agency and nonprofit programs as well as providing continuing education to improve upon their business once reopening occurs.

I provide this prefatory as there appears to be a bias regarding physical retail. As our assets are primarily situated within secondary trade areas, we serve as a major component of their local and regional economic base. In many instances, the commercial property and sales tax revenue generated from WPG assets is vital to the city of Aurora and Arapahoe County. There is also the second order GDP impact relating to repatriation of the income of tenants and employees back into the area e.g. they eat, work, shop and reside where they work. For instance, WPG assets conservatively account for the following on a national basis:

- o Nearly \$7B of total sales volume;
- o These tenant employees earn ~\$2.5B of wages;
- o The aforementioned sales generate ~\$500B of sales tax receipts;
- o Said wages result in ~\$740M of payroll tax receipts; and
- o Tenant employment within WPG assets total ~110,000;
- o WPG pays ~\$119M of annual property tax

The notion a regional mall poses a safety issue with respect to visitor density can be dismissed via simple arithmetic. For Town Center at Aurora, we calculate the maximum allowable occupancy under existing fire code regulations would equate to 19,431 visitors. Adhering to the proposed 30% capacity guidance would mean limiting visitor total to 5,802. This conservative calculation eliminates all closed retail spaces, back office and other non-accessible portions of the asset. Furthermore, we utilize a ratio of one person per 55 SF of physical space. Commonly accepted industry standards typically apply a one person per 50 SF calculation, hence, we have given ourselves a 10% buffer from the outset which illustrates an abundance of caution.

Washington Prime Group employs a cellular infrastructure anonymously tracking visitors throughout hours of operation. Upon analyzing the data for Town Center at Aurora, we found that even during the busy holiday shopping season, not a single day surpassed the conservative 5,802 shopper threshold at any given time. Further, the highest single day the asset saw 3,926 concurrent guests e.g. 67% of the recommended guidance. Average peak traffic for non-holiday weekends is ~ 2,200 guests or just 37% of the capacity guidance.

Furthermore, we acknowledge that maintaining appropriate social distancing and preventing congregation among visitors is vital to ensuring the wellbeing of visitors as well as tenant and WPG employees. In this regard, we further utilized our shopper tracking methodology to identify 'hot spots' to make certain there was no undue risk in terms of gathering spaces or thoroughfares where adhering to social distancing measures would be impractical to maintain. Again, looking at the holiday shopping season timeframe, we found not a single area would prevent shoppers from maintaining six feet of separation. What's more, while this analysis assumes that all visitors must keep their distance, the reality is that families who have been sheltering in place together will have significantly more room to move throughout the asset while maintaining plenty of distance from one another.

With salons and other nonessential establishments reopening while we are still relegated to retail purgatory, we believe (as well as statistically prove above) our assets present a safer environment due to several practical realities. First and foremost, we have dedicated operational and security professionals to prevent aggregation, enforce regulatory compliance as well as ensure the overall safety of our visitors. Outward facing retail establishments cannot say the same until shoppers actually enter their store. Second, our asset provides for touchless entry as opposed to outward facing retailers where a door is open and closed constantly. Last, the majority of our assets tenancy are 'lower touch' in nature compared to beauty salons and the like which have been allowed to reopen.

The bottom line is this has been a difficult period for everybody. Notwithstanding, Washington Prime Group has acted as a good neighbor in every way, shape and form. In addition, as exhibited above, we serve as an important component of the local economy and delaying our opening without regard for the statistical substantiation which warrants otherwise could result in a much more draconian consequence. I am available to discuss this situation as well as how we might collaborate in the near future to best serve our demographic constituency.

Best,



Louis G. Conforti
Chief Executive Officer
Washington Prime Group, Inc

COVID-19 CODE OF CONDUCT

IN ORDER TO BETTER SUPPORT HEALTH GUIDELINES WE HAVE A NEW CODE OF CONDUCT.



YOUR HEALTH + SAFETY IS OUR TOP PRIORITY.

We are focused on providing a safe and enjoyable experience for everyone. We ask all guests to conduct themselves in a safe and respectful way in accordance with our Code of Conduct and all laws and local ordinances. In the continued need to address the coronavirus (COVID-19) pandemic, we have proactively implemented additions to our Code of Conduct, effectively immediately until further notice.

COVID-19 CODE OF CONDUCT

1. Practice social distancing and stay at least 6 feet (2 meters) from other people.
2. Covering your mouth and nose with a cloth face cover is recommended.
3. Do not gather in groups.
4. Do not move tables or seating within the food court or other common areas.
5. Adhere to each individual tenant's COVID-19 policies.
6. Adhere to all federal, state and local regulations, recommendations and mandates regarding COVID-19.
7. If applicable, follow line queuing procedures provided by tenant(s) and/or center management
8. If applicable, adhere to the limit on the number of people permitted inside each individual tenant's store at one time.
9. People who have been diagnosed with COVID-19, or are waiting for test results, or have symptoms such as cough, fever, or shortness of breath should adhere to the CDC guidelines for quarantine and isolation.

REDUCED HOURS

**MONDAY-
SATURDAY**

11AM-7PM

SUNDAY

12PM-6PM

PROMOTING SOCIAL DISTANCING

ENTRANCES & ONE WAY TRAFFIC

- All entrances will be propped open to encourage touch free experience.
- The entrances and exits are labeled, and one way traffic is encouraged throughout the center.
- Floor clings to encourage proper social distancing have been dispersed throughout the center.
- No merchandise, signs, or displays allowed in the common area, in order to keep walkways completely open.



COVID-19 COMMUNITY MESSAGING THROUGHOUT THE CENTER

22x28 Code of Conduct Covid 19 Only



22x28 Code of Conduct Front



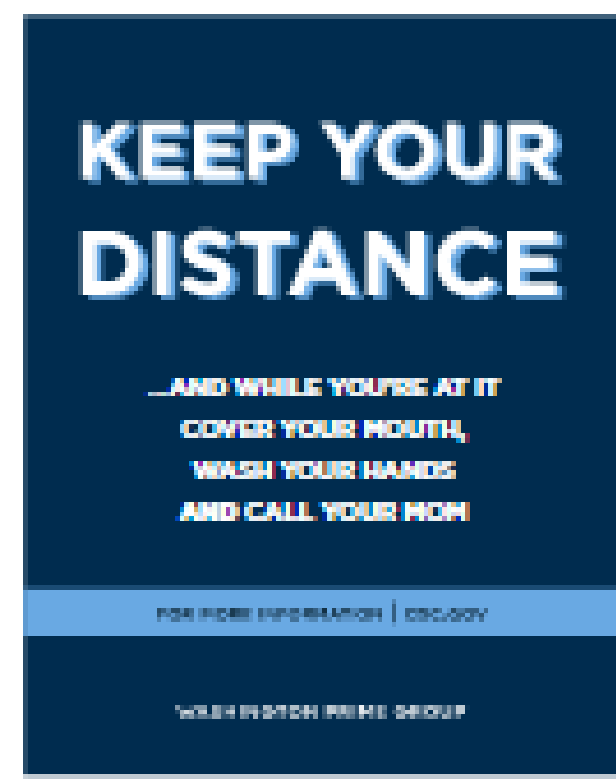
22x28 Code of Conduct Back



22x28 General Awareness



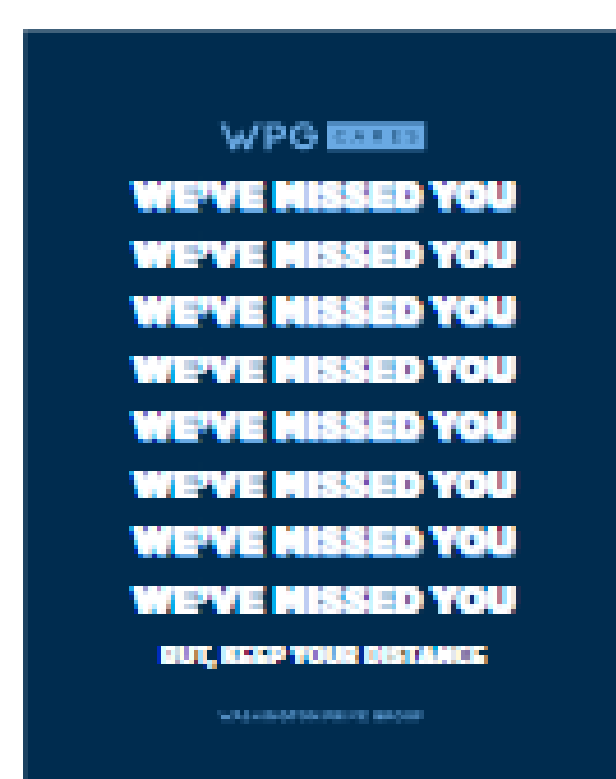
22x28 Keep Your Distance



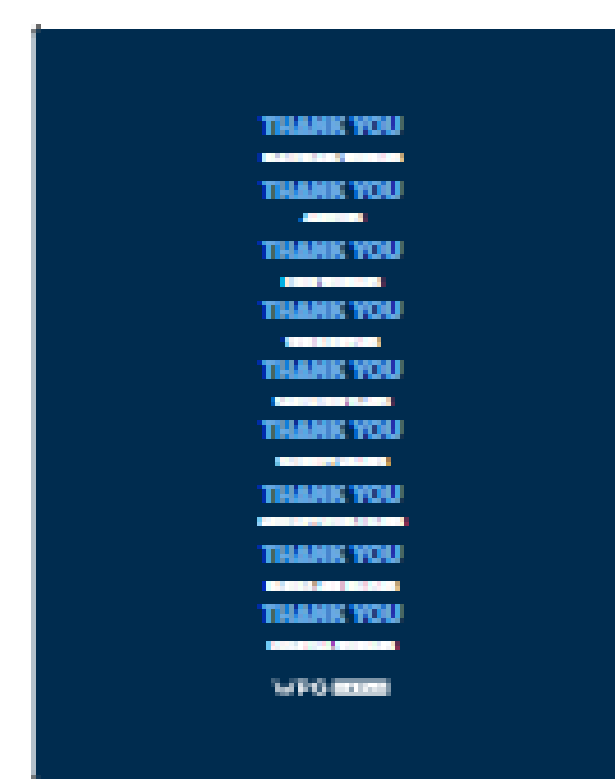
22x28 Solidarity



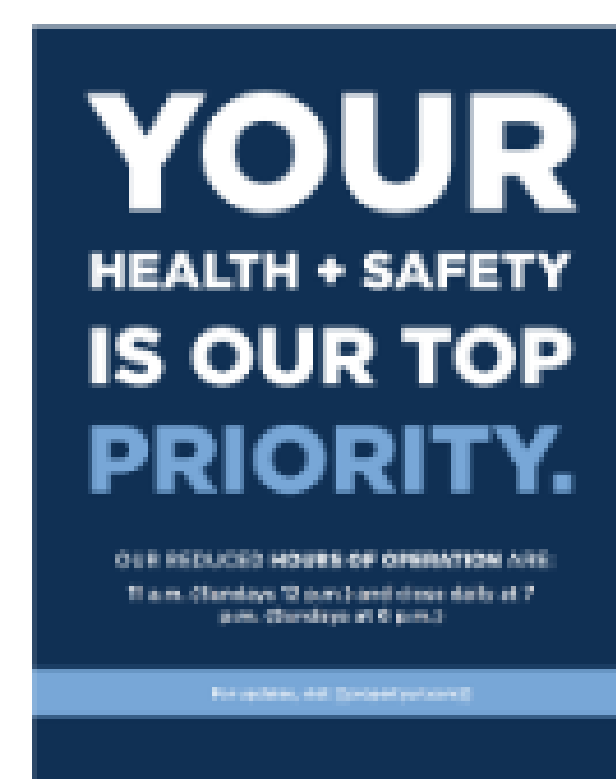
22x28 We've Missed You



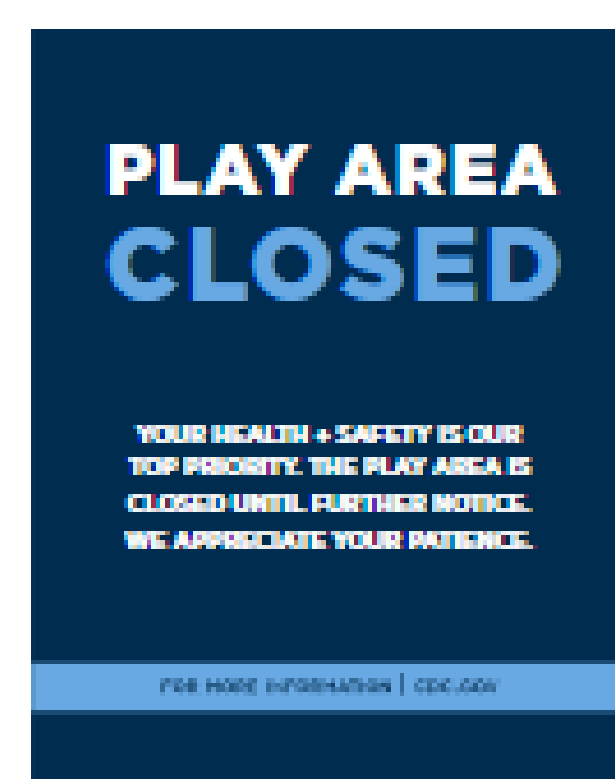
22x28 Thank You



22x28 Reduced Hours Editable PowerPoint



22x28 Play Area Closed / Temporary Closed (Front Pictured)



22x28 Restroom Closed



22x28 Limited Food Hall



ELIMINATION OF SEATING AREAS

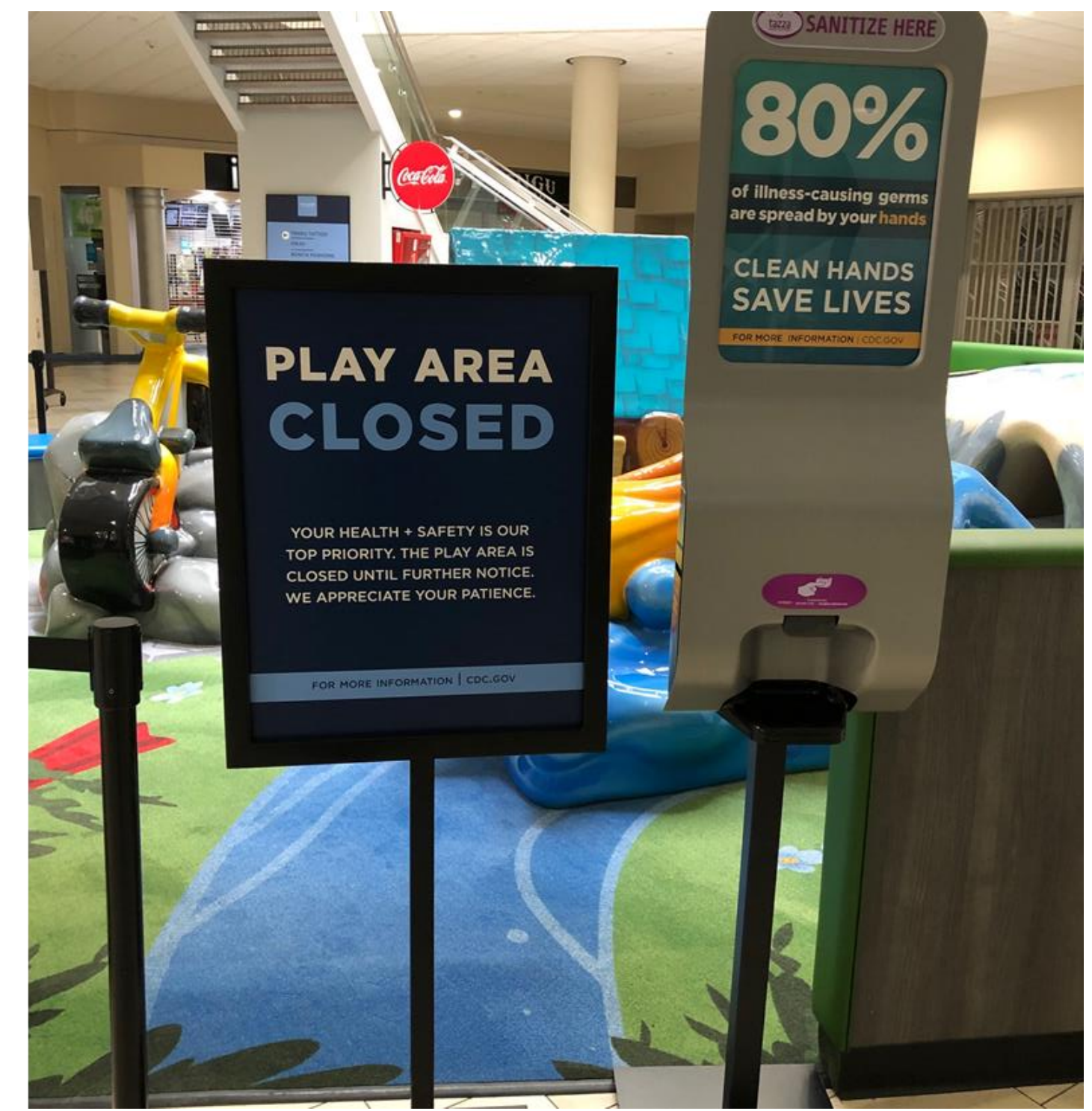
FOR PUBLIC SAFETY, ALL SEATING AREAS HAVE BEEN REMOVED FROM THE FLOOR.



RESTRICTED AMENITIES

Town Center at Aurora will restrict access to amenities that pose a health concern. Restricted amenities include:

- Play Area
- Experiential Vending
- Drinking Fountains

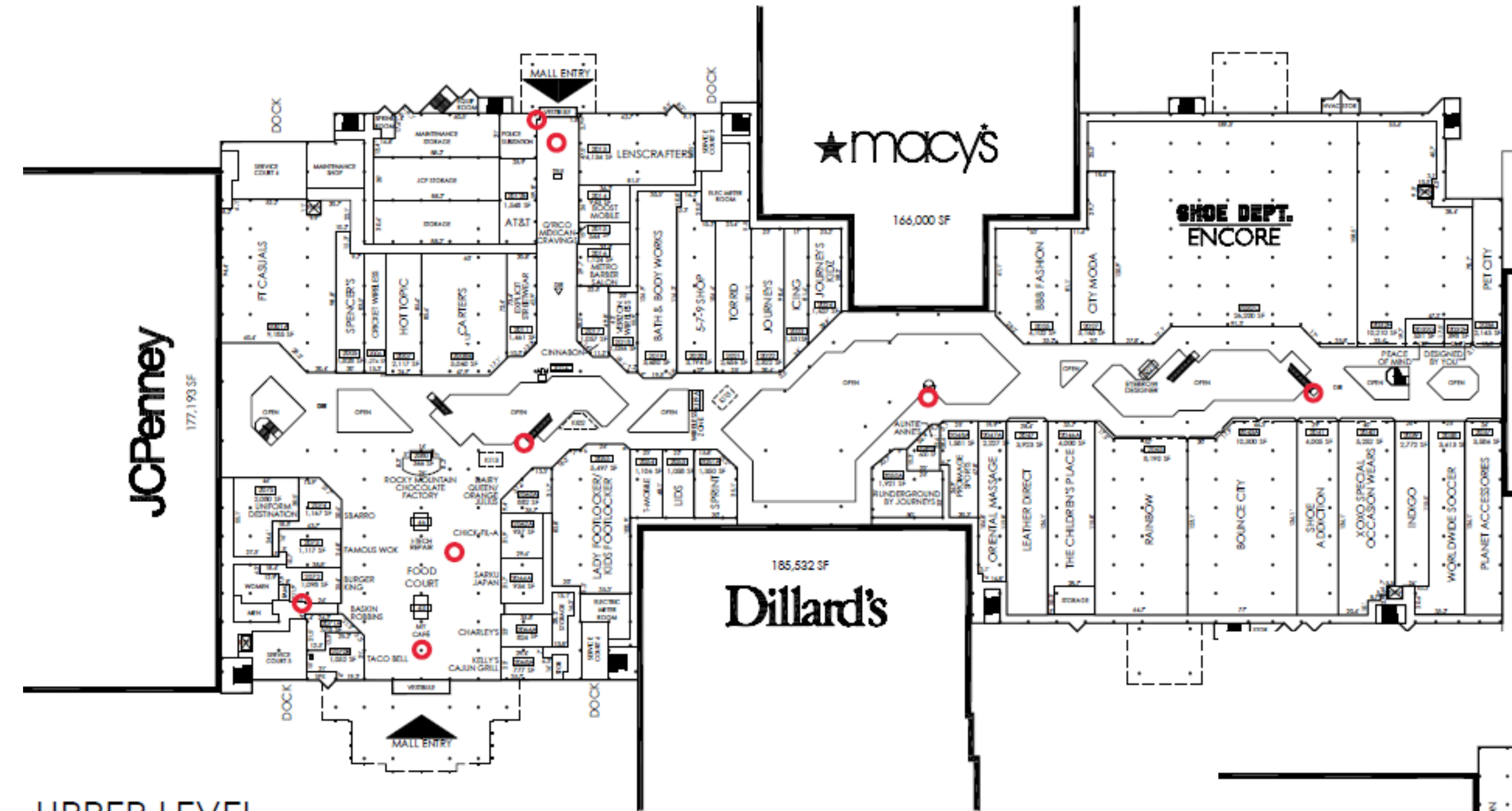


HAND SANITIZING

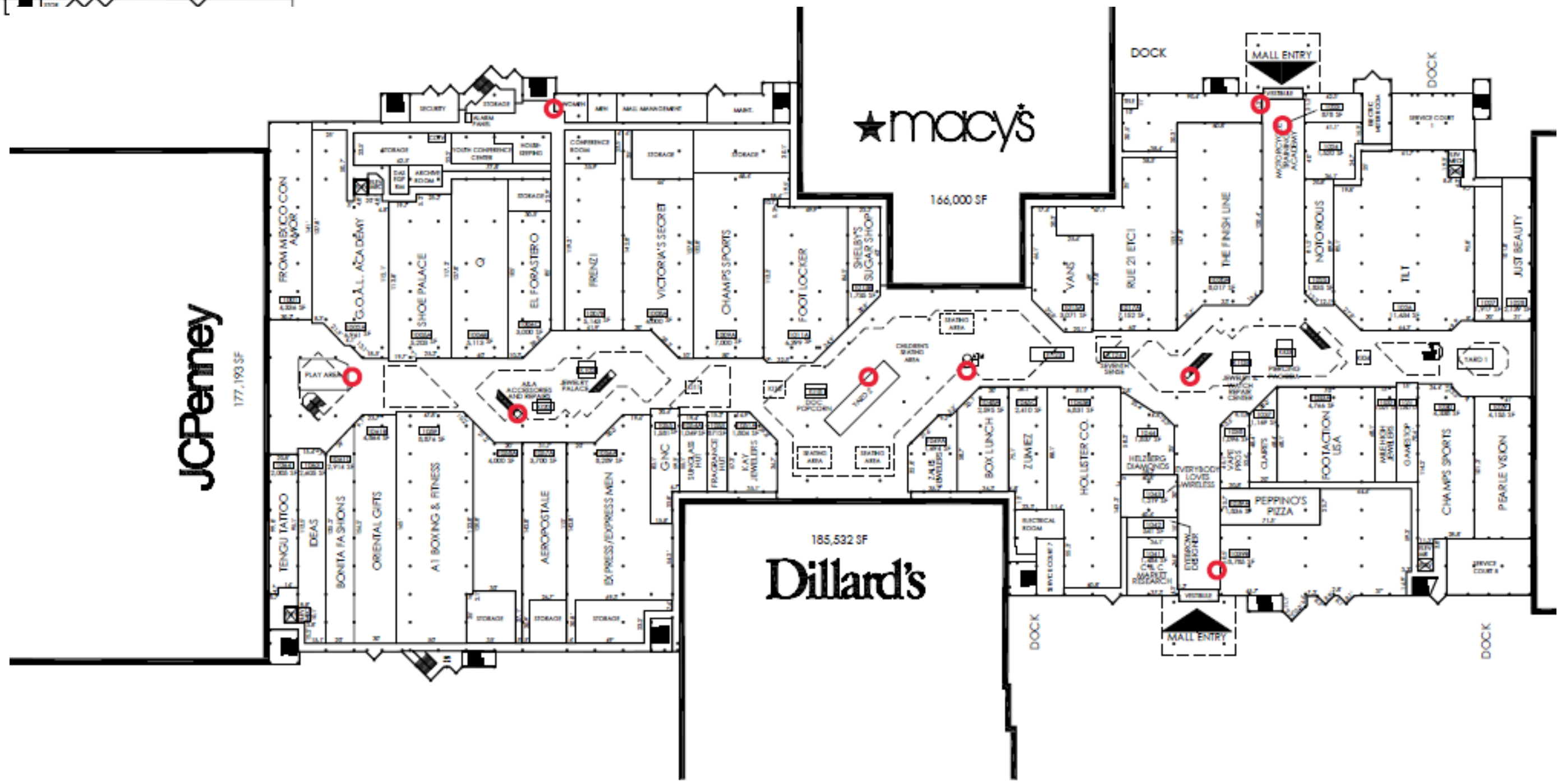
HAND SANITIZING STATIONS

17 STATIONS HAVE BEEN DEPLOYED THROUGHOUT THE CENTER





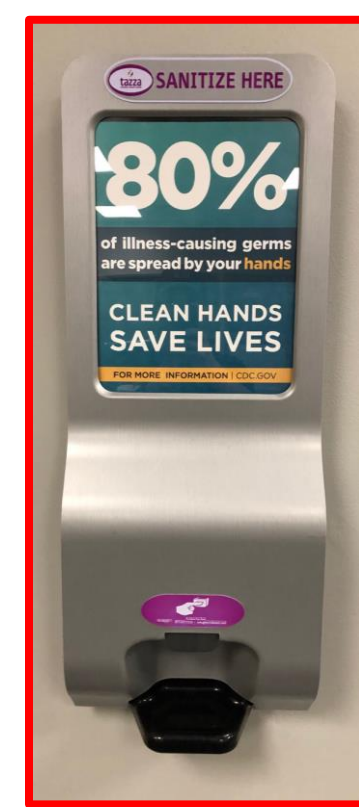
UPPER LEVEL



LOWER LEVEL

KEY:

○ HAND SANITIZER



There are 17 Hand Sanitizing Stations inside of Town Center at Aurora. They are located at all of the main entrances and at every escalator and elevator.

ENCOURAGING MASKS

Per CDC guidelines. Our new COVID-19 Code of Conduct states: “Covering your mouth and nose with a cloth face cover is recommended.”

COVID-19 SECURITY PROTOCOLS

- Patrolling officers will educate any members of the public violating social distancing guidelines and/or acting in a manner contrary to guidelines and restrictions from regional COVID-19 authorities
- Exterior patrolling officers shall also educate members of the public on social distancing guidelines in and around exterior areas of the property with a primary emphasis on entrances.
- Security officers are to zone throughout the common area of the center. All service entries will be checked on a consistent basis.
- Areas of focus for the security team are: pedestrian traffic flow, common areas, and restrooms.
- Corrective measures will be taken for non compliance issues if they cannot be resolved through customer education.
- If compliance is not reached the non-compliant party will be politely asked to leave the center. If necessary, we will partner with the Aurora Police Department should the situation become criminal in nature.



**WHEN TIMES
GET TOUGH,
OUR
COMMUNITY
GETS
TOUGHER.**

COVID-19 HOUSEKEEPING INITIATIVES

- Housekeeping staff are to zone throughout the common area of the center in a manner consistent with social distancing best practices.
- Emphasis will be placed on cleaning high touch points in common areas as well as disinfection. Regular cleaning procedures such as floor scrubbing, high dusting, etc. will be secondary to disinfection protocols.
- High touch points in common areas will include any vending machines or fixtures that customers physically interact with.

FOR MORE INFORMATION:

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