

# Transition Plan for Title II Public Entity

Americans with Disabilities Act (ADA)

El Paso County, Colorado





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FACILITIES, PARKING, AMERICANS WITH DISABILITY ACT (ADA)

**El Paso County, Colorado**  
**Americans with Disabilities Act (ADA)**  
**Transition Plan for Title II Public Entity**  
**CORE FOCUS: COUNTY INFRASTRUCTURE**

## *Abstract*

El Paso County's ADA division is tasked with developing an Americans with Disabilities Act Transition Plan to be submitted for both public review and comment prior to its submission to the El Paso County Board of County Commissioners (EPC BoCC) for approval and adoption as a County Resolution. The Transition Plan is designed to help El Paso County adhere to the ADA and Section 504 of the Rehabilitation Act of 1973 (504) requirements as they are defined by related regulations to develop and implement a Transition Plan.

Adopted on July 26, 1990, the ADA is a federal civil rights law that provides protections for persons with disabilities against discrimination by both public and private entities. The Americans with Disabilities Act and amendments provide comprehensive civil rights protection to qualified individuals with disabilities; Title II of the Act covers programs, services and activities of public entities, such as El Paso County. Section §35.130 of Title II requires that each program, service or activity conducted by a public entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities.

El Paso County programs, services, and activities, when viewed in their entirety, must be made accessible to and usable by individuals with disabilities, except where to do so would result in a fundamental alteration in the nature of the program, result in undue financial and administrative burdens or threaten or destroy the historic significance of a historic property. El Paso County recognizes that it must examine each program, service or activity to determine whether any physical barriers to access exist.

In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons, shall develop a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.

The plan shall (1) identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities, (2) detail the methods that will be used to make the facilities accessible, (3) specify a schedule to achieve compliance and (4) identify steps forecasted for associated years in the transition period.

Continued efforts to comply with ADA and Section 504 include periodic reviews of the transition plan and updates as deemed appropriate to address progress towards improving accessibility and provide for any Plan modifications. The ADA division has instituted an ADA complaint procedure and is taking steps to encourage public involvement incorporating outreach and accommodation methodology.

For the purposes of the Transition Plan, a "Public Facility" is defined as any building or other facility owned or governed by El Paso County that is open to the community. This includes parks, outdoor spaces and pedestrian features within the public right of way, including sidewalks, curb ramps, cross walks, pedestrian signals and other features or facilities. Public facilities are required to be evaluated to determine barriers to El Paso County programs, services and activities. The Transition Report includes lists of County owned or leased buildings and sites, including parks and outdoor spaces, which provide a program, service or activity to the community. These lists are not inclusive and will continue to be amended as new facilities, parks and outdoor spaces are acquired or divested, thus these lists are subject to change.

El Paso County's ADA division survey methodology complies with best practices. Priorities for accessibility are assigned in accordance with the ADA Checklist for Existing Facilities, which prioritizes as follows: (1) accessibility by approach and entrance, (2) goods and services, (3) public toilet rooms and (4) other items such as water fountains and public telephones.

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## ***Section 1: Introduction***

El Paso County actively complies with the provisions and regulations defined by the Americans with Disabilities Act (ADA) and amendments, the Rehabilitation Act and amendments, and makes reasonable attempts to ensure the spirit of the preceding historic benchmark legislation is adopted into County business models and activities. El Paso County is committed to full and equal opportunity for all its citizens, including individuals with disabilities. Further, the County recognizes that its community's continued vitality, strength and vibrancy results from the valuable contributions from the entire community. Pursuant to this conviction, El Paso County developed its Transition Plan as a path to achieve reasonable full and complete physical accessibility for all programs, services and activities provided to members of the community, including members with disabilities.

Supporting the spirit of inclusion into mainstream American life, the **El Paso County, Colorado, Americans with Disabilities Act (ADA) Transition Plan for Title II Public Entity** is submitted for both public review and comment prior to its submission to the El Paso County Board of County Commissioners (EPC BoCC) for approval and adoption as a County Resolution.

### **ADA General Information**

The Americans with Disabilities Act of 1990 and amendments provide comprehensive civil rights protection to qualified individuals with disabilities in the areas of employment, public accommodations, state and local government services, and telecommunications. A primary goal of the ADA is to ensure equal participation in public life for all Americans with disabilities. Title II of the Act covers programs, services and activities of public entities, such as El Paso County.

Under Title II, a public entity may not deny the benefits of its programs, services, and/or activities to individuals with disabilities by maintaining inaccessible facilities, which house these programs, services and activities. El Paso County programs, services, and activities, when viewed in their entirety, must be made accessible to and usable by individuals with disabilities, except where to do so would result in a fundamental alteration in the nature of the program; result in undue financial and administrative burdens or threaten or destroy the historic significance of a historic property.

Section §35.130 of Title II requires that each program, service or activity conducted by a public entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities. The regulation makes clear, however, that a public entity is not required to make each of its existing facilities accessible (§35.150(a) (1)). Unlike Title III of the ADA, which requires public accommodations to remove architectural barriers where such removal is "readily achievable," or to provide goods and services through alternative methods, where those methods are "readily achievable," Title II requires a public entity to make its programs accessible in all cases, except where to do so would result in a fundamental alteration in the nature of the program or cause an undue financial and administrative burdens. The US Congress intended the "undue burden" standard in Title II to be significantly higher than the "readily achievable" standard in Title III. Thus, although Title II may not require removal of barriers in some cases where removal would be required under Title III, the program access requirement of Title II should enable individuals with disabilities to participate in and benefit from programs, services or activities in all but the most unusual cases.

### **History of the ADA**

Adopted on July 26, 1990, the ADA is a federal civil rights law that provides protections for persons with disabilities against discrimination by both public and private entities. The ADA extends similar protections provided by Section 504 of the Rehabilitation Act of 1973 (504).

- Section 504 requires entities that receive federal financial assistance to ensure they do not discriminate against persons with disabilities when providing their services, programs and activities.
- The ADA prohibits discrimination on the basis of disability for operations conducted by State and local governments and for facilities owned by private businesses, even if no federal financial assistance is received.
  - Title II of the ADA requires state and local governments to ensure their services, programs and activities are accessible to and useable by persons with disabilities.
  - Title III requires public accommodations and commercial facilities to design and alter their buildings and sites to ensure they are designed, constructed and altered in compliance with accessibility standards.

As a public entity, the operations of El Paso County are subject to the requirements of Title II of the ADA and Section 504 of the Rehabilitation Act as a recipient of federal funds.

As an employer, a provider and user of public and private services, El Paso County is also subject to requirements of the ADA, Title I (employment provisions and regulations).

This document was designed to help El Paso County adhere to the above ADA/504 requirements as they are defined by related regulations to develop and implement a Transition Plan.

### *Non-Discrimination Statement*

El Paso County provides equal employment opportunities (EEO) and is committed to a workplace free of discrimination and harassment based on race, color, religion, age, gender, sex, pregnancy, national origin, disability, height, weight, gender identity, marital status, military status, sexual orientation, veteran status, genetic information, or any other characteristic protected by law.

### *ADA Title II Transition Plan Requirements*

1. In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.

2. If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan must include a schedule for providing access features, including curb ramps for walkways. The schedule must provide for pedestrian access upgrades to government offices and facilities, transportation, places of public accommodation, and places of employment, followed by walkways serving other areas.

3. The plan shall, at a minimum, accomplish the four following tasks:

- Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Describe in detail the methods that will be used to make the facilities accessible;
- Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and
- Continue efforts to fully comply with all aspects of the ADA and Section 504, including the Administrative requirements of; 1) Identifying a responsible employee empowered to address and implement ADA and Section 504 compliance activities; 2) Provide notice to the public of evaluations and the status of barrier findings; 3) Develop and utilize a grievance procedure; and 4) Develop and implement a Transition Plan.

4. If a public entity has already complied with the transition plan requirement of a Federal agency regulation implementing section 504 of the Rehabilitation Act of 1973, then the requirements of this paragraph (d) shall apply only to those policies and practices that were not included in the previous transition plan.

### Monitoring and Updating Plan

El Paso County will review the Transition Plan on a periodic basis and update it as deemed appropriate to address progress towards improving accessibility and provide for any Plan modifications. The ADA Department will work with the different County departments and appropriate staff during this review to identify updates and incorporate new information pertaining to accessibility and the ADA into the Transition Plan. Public comments or suggestions received will be incorporated as deemed appropriate.

### ADA Specialist

The ADA requires public entities with fifty (50) or more employees to designate one or more individuals as responsible for monitoring compliance with and investigating potential violations of the ADA. This individual is the primary point of contact for individuals with disabilities to:

- Request auxiliary aids and services, policy modifications, and other accommodations;
- Address ADA concerns from the general public and from other departments and employees of the public entity; and/or
- File a complaint with the County regarding accessibility to County programs, activities and services.

The person appointed to this position must be familiar with the County's operation, trained in the requirements of the ADA and other laws pertaining to discrimination, and able to deal effectively with local governments, advocacy groups, and the public.

To ensure the formation and implementation of the Transition Plan, El Paso County has designated the below ADA Specialist, to help coordinate efforts laid out by the Transition Plan.

David Mejia  
325 South Cascade Avenue  
Colorado Springs, CO 80903

Phone: 719.520.6866  
Fax: 877.288.0401  
davidmejia@elpasoco.com  
[ADACompliance@elpasoco.com](mailto:ADACompliance@elpasoco.com)

### ADA Complaint Procedure

Any person who believes they have been the subject of disability-related discrimination or who is filing on behalf of a person with a disability may email the ADA Specialist with the information set forth below.

Disability-related complaints should provide:

- The full name, address and telephone number of the person who was allegedly discriminated against;
- The name of the organization that has allegedly discriminated, its address and telephone number, and any other identifying information;

- A description of the allegedly discriminatory actions that are the basis for the complaint (dates of the actions, names of those who allegedly discriminated, and witnesses);
- Any other information that is necessary to support the complaint;
- Copies of relevant documents (please do not send originals).

Complaints may be submitted via email, US mail or delivered by the grievant and/or his/her designee. Complaints should be submitted as soon as possible but no later than 60 calendar days after the alleged violation to:

David Mejia, ADA Specialist  
325 South Cascade Avenue  
Colorado Springs, CO 80903

Phone: 719.520.6866  
Fax: 877.288.0401  
davidmejia@elpasoco.com  
[ADACompliance@elpasoco.com](mailto:ADACompliance@elpasoco.com)

Within 15 calendar days after receipt of the complaint, the ADA Specialist will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the ADA Specialist will respond in writing, and, where appropriate, in a format accessible to the complainant, if reasonably possible. This may include, but not be limited to email, large print, Braille, or audio disk. The response will explain the position of El Paso County and offer options for substantive resolution of the complaint.

If the response by the ADA Specialist, does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision of the ADA Specialist within 15 calendar days after receipt of the response to the Facilities Department Director or their designee.

Within 15 calendar days after receipt of the appeal, the Facilities Department Director or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Facilities Department Director or designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Specialist, appeals to the Facilities Department Director or designee, and responses from the ADA Specialist and Facilities Department Director or their designee will be kept by El Paso County for a minimum of three years.

### *Public Involvement*

El Paso County represents a diverse population and in order to achieve compliance with the public input and involvement provisions of Title II, El Paso County invites ongoing public involvement through direct communication with the ADA Specialist and networking with local advocacy groups. Public outreach and public surveys may be developed to provide opportunities for individuals to comment on and help develop ongoing Transition Plan revisions.

Community members are able to take advantage of the following current outreach efforts:

Outreach and accommodations available to persons with visual impairments: The ADA Transition Plan will be made available to persons who are visually impaired via a large print text document and Braille. Persons with visual impairments who have access to software that converts text to audio may request the document via e-mail, floppy disks or CDs. Other auxiliary aids and services, if reasonable, may be available upon request free of charge, by contacting the ADA Specialist. Reasonable efforts will be made to make the ADA Transition Plan accessible to any who are interested.

The El Paso County (EPC) ADA web page, will host the approved Transition Plan. The EPC ADA web page will provide the public information on emergent ADA Department projects, to include, purpose of project, schedule and timeline, pedestrian/disability access consumer survey(s), public involvement opportunities and contact information. In addition, the draft and most current ADA Transition Plan will be posted on the EPC ADA web page.

The ADA Department continues to explore the best way to develop and distribute a consumer survey to identify hotspot locations, physical barriers to public buildings, facilities, programs and services. This process may include, but not limited to, distribution to members of the public, to persons with disabilities, to advocacy groups, and to community disability organizations. The Transition Plan will also be available upon request in various alternate formats such as large print, CDs, and electronic format such as HTML. Requests for copies of the Transition Plan and additional public comments may be directed to:

El Paso County ADA Specialist, David Mejia  
325 South Cascade Avenue, Colorado Springs, CO 80903  
Telephone: 719.520.6866  
Fax: 719.520.6111 E-mail: [ADACompliance@elpasoco.com](mailto:ADACompliance@elpasoco.com)

### *Community and ADA Advocacy Outreach*

The ADA Department meets quarterly at the Independence Center (IC) along with other municipalities from our region, including the City of Colorado Springs and Pikes Peak Regional Office of Emergency Management (PPROEM). Presentations consider countrywide natural disasters, both recent and past, with a focus on how the disabled community was affected, notified and assisted. An emphasis is placed on recognized challenges, how those challenges were addressed and what new knowledge is accumulated.

Approximately two years ago, El Paso County provided input to the ADA evaluation checklist for emergency shelters, currently used by the Red Cross of America. El Paso County currently offers assistance when requested by the Red Cross.

The ADA Department investigates ways to enhance its understanding of the disabled community needs for reasonable accessibility and will continue developing robust relationships with disability advocacy stakeholders. These relationships will allow El Paso County to further explore how best to serve the needs of persons in our community with disabilities.

## ***Section 2: Public Right of Way***

The public right-of-way is an area of land owned or controlled by the County for the purposes of constructing, operating and maintaining public features such as streets, alleys, sidewalks, pedestrian curb ramps, bike paths utilized for transportation, utilities and other infrastructure. El Paso County has strived to improve accessibility for pedestrian modes of travel through the expansion of an accessible transportation network. The El Paso County (EPC) Department of Public Works (DPW) is addressing pedestrian access route system needs including:

- Ensuring all new transportation capital projects include pedestrian access routes that meet the current Engineering Criteria Manual (ECM) criteria - where applicable;
- Providing funding in all pavement management overlay projects for accessible features. The accessible features will meet ECM criteria for curb ramp standards at the time the concrete work is performed allowing the pavement overlay project to incorporate the accessibility;
- Ensuring all new developments and site expansions or improvements include pedestrian access routes that meet the current ECM criteria where applicable;
- Addressing specific citizen requests and grievances; and
- Exploring external funding avenues including grants, to fund additional accessibility projects.

The following criteria are considered when prioritizing projects by the Department of Public Works. These are not necessarily listed by importance because some criteria may be of higher importance on one project but lower importance on another project:

- Citizen grievances
- Proximity to government facilities
- Streets with higher traffic volumes
- Streets with public transit service
- Streets with pedestrian attractors like schools, parks and shopping
- Proximity to medical facilities
- Improved system connectivity
- Safety
- Grant availability or other funding availability factors
- Proposed overlay projects

Section 1.9 of the ECM provides the ECM Administrator the authority to allow deviations to the ECM criteria if it helps ensure public safety, is more efficient or maximizes the overall benefit and utilizes public funds in the most efficient manner.

EPC DPW is conducting a multi-phase approach to addressing ADA concerns in the Right Of Way. Most phases will run concurrently with the other phases of the multi-phase approach, and a detailed timeline for each phase will be located at El Paso County Department of Public Works. A summary of the multi-phase approach follows.

### ***Phase 1: Training***

EPC DPW recognizes the need for training in order for inspectors and engineers to have the knowledge needed to properly design and construct pedestrian access routes. DPW sent two inspectors to the Federal Highway Administration (FHWA) course Designing Pedestrian Facilities for Accessibility on May 28-29, 2019. Course information and training materials were distributed to EPC DPW inspectors and engineers by July 15, 2019. EPC DPW will schedule and send the remaining available engineers and inspectors to the same course. EPC DPW is available to host the course.

#### Phase 2: Engineering Criteria Manual Review and Update

EPC DPW recognizes that updates to the ECM need to be considered regarding pedestrian access routes. The ECM will be compared to the draft Public Rights-of-Way Accessibility Guidelines (PROWAG) criteria. The ECM will also be compared to CDOT's current criteria. Specific updates to the ECM regarding pedestrian access routes will be determined based on the PROWAG and CDOT criteria reviews. These ECM updates will be implemented by July 1, 2020.

#### Phase 3A: Inventory Current Assets as of July, 2018

Street-view images of EPC's paved roads were collected in July 2018 as part of a pavement condition study. All paved roads that have been formally accepted for maintenance by the BoCC were included in the study. EPC DPW is reviewing methods to maximize these existing products to create a curb ramp location inventory. This inventory is scheduled to be complete by July 1, 2020. This inventory will be used to document curb ramp locations which will facilitate the collection of curb ramp attributes.

#### Phase 3B: Inventory of Assets Accepted after July 2018

The street-view images collected in the past will not provide location information on curb ramps built after July 2018. Therefore, inventory of assets within the County Right of Way accepted after July 2018 will be necessary. Because there is a delay in acceptance of subdivisions after construction of the infrastructure, many subdivisions were built prior to the July 2018 date. EPC DPW plans to use more recent aerial photography to inventory subdivisions accepted after July 2018. After this inventory is conducted, inspectors will be sent to newer subdivisions to collect additional curb ramp locations utilizing GPS. DPW recognizes the inventory of curb ramps built after July 2018 will be an ongoing process. However, DPW expects the inventory of assets accepted after July 2018 to be current and up to date as of July 1, 2020. After the inventory list becomes current, El Paso County will continue to update the curb ramp inventory. The methods to be used to keep the curb ramp information current are in review. Consideration is being given to hand-held GPS units, using construction plans, or using as-built plans.

#### Phase 4: Collect Attributes of the Existing Inventory

EPC DPW recognizes the need to collect attributes of the curb ramps. Collection of attributes of curb ramps will begin when there is an inventory of current curb ramps. Collection of attributes will continue e existing inventory is complete. El Paso County anticipates the collection of attributes will be complete by January 1, 2022.

#### Phase 5: Create New, or Modify Existing, ADA Asset Construction and Maintenance Program

After creating an inventory of ADA assets which includes the asset conditions/serviceability, DPW will produce a strategy for addressing noted deficiencies. This strategy will be coordinated with the EPC ADA Compliance Office and presented to the EPC Board of County Commissioners.

## **Section 3: Government Owned Buildings, Facilities, Parks and Open Spaces**

### Inventory/Discovery Efforts

El Paso County recognizes that it must examine/assess each program, service or activity to determine whether any physical barriers to access exist. This examination/assessment will identify steps needed to be taken to enable these programs, when viewed in their entirety, to be made reasonably accessible. If structural changes are necessary, the program, service or activity physical accessibility need(s) will be referred for inclusion in the transition plan. El Paso County further recognizes that if a Self-Evaluation Program determines physical changes to existing facilities are necessary, these too must be included in the transition plan.

As part of the El Paso County Self Evaluation process, El Paso County has determined certain public buildings, facilities and pedestrian structures and features must be evaluated to determine barriers to El Paso County programs, services and activities. "Public Facility", includes any building or other facility owned or governed by El Paso County that is open to the public. This includes parks, outdoor spaces and pedestrian features within the public right of way, including sidewalks, curb ramps, cross walks, pedestrian signals and other features or facilities.

The following list of County owned or leased buildings and sites providing a program, service or activity will be evaluated. This list is not inclusive and will continue to be amended as new facilities are acquired or divested, thus this list is subject to change.

### County Owned/Leased Public Buildings

#### Public Buildings & Facilities

<b>Year Built</b>	<b>Building Name</b>	<b>Address</b>
	Calhan Community Outreach Center	328 10 <sup>th</sup> Street, Calhan, CO 80808
1976	Centennial Hall	200 South Cascade Avenue, Colorado Springs, CO 80903
1898	Center on Fathering	325 North El Paso Street, Colorado Springs, CO 80903
2000	Citizens Service Center	1675 Garden of the Gods Road, Colorado Springs, CO 80907
1987	Coroner's Office	2741 East Las Vegas Street, Colorado Springs, CO 80906
1995	Department of Public Works	3275 Akers Drive, Colorado Springs, CO 80922
1995	Department of Public Works – Emergency Services Department	3275 Akers Drive, Colorado Springs, CO 80922
1976	DMV – Centennial Hall	200 South Cascade Avenue, Colorado Springs, CO 80903
2000	DMV – Citizens Service Center	1675 Garden of the Gods Road, Colorado Springs, CO 80907
	DMV – Fort Carson	6351 Wetzell Avenue, Building 1525, Fort Carson, CO 80913
2005	DMV – Powers	5650 Industrial Place, Colorado Springs, CO 80916

<b>Year Built</b>	<b>Building Name</b>	<b>Address</b>
2009	DMV - Union	8830 North Union Boulevard, Colorado Springs, CO 80920
1976	El Paso County Fair Grounds	326 10 <sup>th</sup> Street, Calhan CO 80808
2001	Environmental Building	3255 Akers Drive, Colorado Springs, CO 80922
1893	Family Visitation Center	701 East Boulder Street, Colorado Springs, CO 80903
1972	Judicial Building	270 South Tejon Street, Colorado Springs, CO 80903
1980	Pikes Peak Center	190 South Cascade Avenue, Colorado Springs, CO 80903
2004	Pikes Peak Regional Development Center	2880 International Circle, Colorado Springs, CO 80910
2014	Pikes Peak Workforce Center Fountain w/Human Services	351 Lyckman Drive Suite 130, Fountain, CO 80817
1972	Professional Building	105 East Vermijo, Colorado Springs, CO 80903
1970	Public Health WIC Fountain	2948 E. Fountain Boulevard, Colorado Springs, CO 80910
1969	Public Health WIC Widefield	97 Widefield Boulevard, Colorado Springs, CO 80911
1987	Sheriff – Criminal Justice Center	2739 East Las Vegas, Colorado Springs, CO 80906
1960	Sheriff – Office of the Sheriff	27 East Vermijo, Colorado Springs, CO 80903
2004	Sheriff – Video Visitation Center	2727 East Las Vegas, Colorado Springs, CO 80906
1989	Veterans Service Office Center	5850 Championship View, Suite 130, Colorado Springs, CO 80922

Activities El Paso County has undertaken include:

- Engaging in the development of a revised Comprehensive Self Evaluation with policies that strive to meet the requirements of the ADA;
- Continuing efforts to reasonably comply with all aspects of the ADA and Section 504, including the Administrative requirements of 1) continuing ADA education for responsible employees empowered to address and implement ADA and Section 504 compliance activities; 2) Enrich notices to the public, enhancing inclusion of the disabled community; 3) Amending, publishing and utilization of the grievance procedure; 4) Augment EPC ADA Self-Evaluation; and 5) Develop and implement a Transition Plan.

### *Parks and Outdoor Spaces*

Over time, past ADA regulations that lacked the specificity of elemental features were updated to better reflect the accessibility needs of an increasingly mobile population. Combining revised ADA regulations with guidance produced by both the United States Access Board and the Architectural Barriers Act (ABA) provides a foundation for increasing outdoor space accessibility for all members of the community.

To enhance ease of access to parks and outdoor spaces, El Paso County continues to review/access current accessibility of county owned outdoor spaces, including parks and trails. Over time, out-of-date access features will be updated, new access features will be designed, access to parks and trails will be expanded, and accessible sites within a park or open space will be clearly designated by signage.

The following list of County owned parks and outdoor spaces is not inclusive and will continue to be amended as on-site evaluations are completed and alterations and/or new parks are constructed, thus this list is subject to change.

Parks, Recreation Centers, & Fair Grounds

<b>Year Built</b>	<b>Park/Facility</b>	<b>Address</b>
<b>South Division</b>		
1979	John Ceresa Park	1590 Leigh Lane, Fountain, CO 80817
2010	Clear Spring Ranch	PO Box 1575, Mail Code 455 Colorado Springs, CO 80901
2000	Crews Gulch Trail	Fountain, CO 80817
1992	Fountain Creek Regional Park	202 Duckwood Road, Fountain, CO 80817
1991	Fountain Creek Regional Trail	Fountain – Colorado Springs
1978	Stratmoor Hills Park	413 Sinton Avenue, Colorado Springs, CO 80906
2007	Stratmoor Valley Trailhead Park	3010 Glenarm Road, Colorado Springs, CO 80906
1975	Widefield Park	1300 Fontaine Blvd, Security, CO 80911
<b>Central Division</b>		
2008	Bear Creek Dog Park	1704 S. 21 <sup>st</sup> Street, Colorado Springs, CO 80905
2000	Bear Creek Nature Center	245 Bear Creek Road, Colorado Springs, CO 80905
1987	Bear Creek Regional Park	2002 Creek Crossing, Colorado Springs, CO 80905
2015	Jones Park	GPS Coordinates 38.809457 – 104.960036
2010	Rainbow Falls	1350 Serpentine Drive, Manitou Springs, CO 80829
2014	Ute Pass Regional Trail	506 Ruxton Avenue, Manitou Springs, CO 80829
<b>North Division</b>		
1978	Black Forest Regional Park	4800 Shoup Road, Colorado Springs, CO 80908
2012	Black Forest Section 16	8550 Burgess Road, Colorado Springs, CO 80908
1985	Fox Run Regional Park	2110 Stella Drive, Colorado Springs, CO 80921
1997	Santa Fe Regional Trail	15595 Old Denver Highway, Monument CO, 80921
<b>East Division</b>		
2005	Drake Lake Natural Area	7470 Mallard Drive, Falcon, CO 80831

<b>Year Built</b>	<b>Park/Facility</b>	<b>Address</b>
2004	El Paso County Fairgrounds	366 10 <sup>th</sup> Street, Calhan, CO 80808
2016	Falcon Regional Park	10990 Eastonville Road, Peyton CO 80831
2001	Homestead Ranch Park	1644 Gollihar Road, Peyton, CO 80831
2004	Paint Mines Regional Park	29950 Paint Mine Road, Calhan, CO 80808
1997	Rock Island Regional Trail	Rock Island Regional Trailhead can be reached from Highway 24; east to Falcon; turn left on Meridian Road and follow to the trailhead. El Paso County Parks section of the Rock Island Regional Trail runs parallel to US Hwy 24 between the towns of Falcon and Peyton.
1992	Woodlake Open Space	13998 Woodlake Road, Colorado Springs, CO 80908

El Paso County designs and builds all new and improvement projects in accordance with the International Building Code, the 2010 ADA Standards for Accessible Design, the Architectural Barriers Act, and any related guidance provided by the US Access Board.

Accessibility field surveys are planned to determine the location of features that are inconsistent with adopted accessibility standards and codes. As part of the field surveys, data will be collected to determine whether there are any features of parks and outdoor spaces that are not consistent with adopted standards and codes, where compliance is not practicable due to terrain, and where compliance would fundamentally alter the function or purpose of the facility or setting. This data will allow El Paso County to create a list of inaccessible features at parks and outdoor spaces. This list will also include the elements of the park and outdoor spaces that do not comply or pose barriers to individuals with disabilities.

El Paso County budgetary constraints do not permit immediate remediation of all ADA barrier findings uncovered during field surveys of parks and outdoor spaces. Therefore, the data collected will be prioritized, with the primary focus being given to high volume areas, except in cases where public safety takes precedence, or where the remediation is more efficient and maximizes overall community benefit and utilization of public funds.

### *Parks Maintenance Requirements*

Section 35.133 of Title II of the ADA states that:

A public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part. This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs.

Without the resources to monitor the condition of all its facilities, roadways and parks on a daily or weekly basis, El Paso County welcomes community member reports concerning inoperable features and equipment. The County will reasonably and to expeditiously assign repair/maintenance efforts. Priority shall be given to maintenance needs that affect safety and accessibility.

To report maintenance issues that affect accessibility at parks and outdoor spaces, please contact the ADA Specialist at:

David Mejia, ADA Specialist  
325 South Cascade Avenue  
Colorado Springs, CO 80903

Phone: 719.520.6866,  
Fax: 877.288.0401,  
[davidmejia@elpasoco.com](mailto:davidmejia@elpasoco.com), [ADACompliance@elpasoco.com](mailto:ADACompliance@elpasoco.com)

## ***Section 4: Surveying, Identifying, Removal of Barriers and Funding***

### ***Survey Methodology***

Priorities for accessibility are assigned in accordance with the ADA Checklist for Existing Facilities. The checklist includes the four priorities listed in the Department of Justice ADA Title III regulations. These priorities are equally applicable to state and local government facilities:

- Priority 1 – Accessible approach and entrance
- Priority 2 – Access to goods and services
- Priority 3 – Access to public toilet rooms
- Priority 4 – Access to other items such as water fountains and public telephones

The following elements will be reviewed during field surveys to ensure compliance with the 2010 ADA Standards for Accessible Design:

- Pedestrian access routes
- Parking lots and access aisles/curb ramps
- Entrances to county owned buildings
- Service counters
- Restrooms and drinking fountains
- Other service areas open to the public

Collected data will assist El Paso County in identifying barriers limiting accessibility to individuals with disabilities. Reports generated using the collected data will be auto downloaded into the master database program (BlueDAG) as each assessment activity is completed in real-time. At a minimum, the database program will consolidate all field-collected data into tables sortable by data types, locations, structural feature types, and by priority. The database (BlueDAG) auto populates gathered data into secondary Transition Plans (Transition Plans pertaining to individualized buildings, parks, streets, etc.). Secondary Transition Plans are auto populated into the El Paso County overall Master Transition Plan, which will be displayed as part of this document. Data from field surveys are stored in cloud-based technology by BlueDAG to ensure data protection. In addition to data collected regarding inconsistent features (barriers), an inventory will be developed identifying physical features of all buildings and other facilities owned or governed by El Paso County, open to the public.

### ***Accessibility (Physical Barriers) and Inventory Collection Items***

El Paso County ADA Specialists will use the BlueDAG mobile application tool to collect information during field assessments. Information collection will include all features within the public right of way of County owned or operated parks, open spaces, buildings and facilities that do not comply with, or are otherwise inconsistent with adopted

accessibility standards and codes (ADA barriers). Information collected using BlueDAG will auto populate the master database and the Transition Plan in real-time; the information collected may include the following:

- Whether crosswalks are present at any or all crossings. If present, the width, type, alignment, presence of tactile warning consisting of truncated domes, presence of islands and disabled access;
- Whether existing curb ramp(s) are present at any of the corners within the intersection;
- Whether the intersection is standard right angle, T-shaped, Y-shaped, skewed, or any other irregular geometry.
- Whether there are pedestrian island(s) or right turn lanes;
- The presence and nature of abrupt changes in sidewalk level, running slopes, cross slopes, sidewalk width or other obstructions;
- Whether visual or accessible pedestrian signals are present. If present, the type, size, height and location of actuator buttons. The location parameters are “at curb,” “on landing,” “on ramp slope – arm length”;
- Whether tactile guide strips (consisting of truncated domes) are present at any crosswalk. If present, the location, height, width and color of the tactile guide strips;
- The parameters of the transit stop type - none, light rail, bus and other;
- Measurements of all facilities and facility features of all buildings, parks and outdoor spaces as defined by BlueDAG accessibility checklist, including but not limited to: Parking, exterior pedestrian routes, exterior entrances, restrooms, counters, tables, doors, signage, etc.

### Field Survey Assignment Development

EPC ADA Department has developed an assignment schedule to assist ongoing field accessibility and inventory staff evaluations for EPC owned or governed buildings, parks, outdoors spaces, and facilities. As field investigation staff collect information/data, utilizing the BlueDAG mobile application tool, the mobile application auto generates longitude and latitude coordinates for each assignment and plot assignments onto the master database mapping tool as it is collected and, the data can also be populated into Microsoft Excel.

### Barrier Removal Methods, Schedule, and Funding

#### *A. Overall Guidelines*

A public entity shall operate each service, program or activity in such a way that, physical access to the place where the service, program or activity is held does not preclude or discriminate against an individual with a qualified disability. ADA does not require the public entity to make all of its existing facilities accessible, nor does it require a public entity to take any action that would fundamentally alter the nature of a service, program or activity. In addition, it does not require implementation of ADA that would result in undue financial and administrative burdens. In such cases where documentation is provided in keeping with strict procedures outlined in the ADA, there are various methods that may be appropriate for providing program accessibility in lieu of making actual physical changes to facilities.

With the preceding in mind, the first step in determining what structural changes to existing facilities are necessary, is to develop an understanding of the specific public programs and activities occurring at existing facilities within El Paso County.

El Paso County has established many working groups since 2015 who have assisted with understanding the needs and making relevant decisions regarding accessibility to programs and activities, including employment. An example of those consulting working groups include members from Public Works (Engineering, Traffic Engineering), Community Services Department, and Facilities and Strategic Infrastructure Management.

#### *B. Transition Plan Barrier Removal Decisions, Implementation and Quality Control Oversight*

The first step in determining barrier removal is examining barriers in detail, establishing how each barrier effects overall program accessibility and whether or not program accessibility can be achieved without removing the barrier or if other means of program accessibility exist. For example, if courtrooms exist on the third floor of a building and only steps lead to the courtrooms, then the courtroom program is inaccessible. In this situation, determinations must be made regarding how the public court program can be made accessible. Barrier removal to the public court program could consist of the installation of a standard 2,000 lb. passenger elevator; where technical infeasibility exists, such as the requirement for the removal of load bearing walls then a limited use elevator may be an alternative. Additionally, other alternatives may exist; public court proceedings could be provided at another alternate fully accessible location or new public court facilities could be constructed to ensure full accessibility. This represents only one example of a barrier to a public program and some of the alternatives permissible to remove barriers in existing facilities.

Potential alternate program access to existing facilities will be considered prior to the beginning of barrier removal construction projects. It should be understood that in the majority of situations, physical construction may be necessary to ensure program access through barrier removal. However, program access considerations should be evaluated in order to help ensure the most efficient usage of public funds.

Where barrier remedy solutions require construction, and activities and programs cannot be made accessible through alternate means, barrier removal methods and transitioning will be guided by the set of strategies below. The web-based BlueDAG program provides detailed information pertaining to each barrier and the associated corrective action needed to make each facility/element accessible where construction is required. These deficiencies are then included in upcoming modifications that may be administered through internal departments/staff or contracted means.

#### *C. Selection of Barrier Removal Methods*

The ADA Specialist will utilize existing departments to implement capital improvements and maintenance programs for barrier removal.

The main purpose of a Transition Plan is the conversion of a state of inaccessibility to that of full reasonable accessibility, as defined by the ADA and Section 504. The methods adopted by El Paso County for barrier removal will ultimately be determined by the ADA Department in agreement with the affected departments, feedback from the public, feedback from individuals with disabilities and feedback from those organizations that represent individuals with disabilities. The ADA Department, related staff and stakeholders may deviate from barrier removal methods, if doing so, ensures public safety, is more efficient, maximizes overall benefit and utilizes public funds in the most effective manner.

#### *D. Determination of Barrier Removal Priorities*

Priority 1: Grievances from the public, and specifically individuals with disabilities will be the first priority for barrier removal, regardless of what building or facility the grievance pertains to, so long as, the building or facility is owned, operated or governed by El Paso County;

Priority 2: Physical locations identified to be problem areas vis-à-vis public involvement, consumer surveys, and the Transition Plan comment period will be the second priority for barrier removal; and

Priority 3: Physical barriers identified during a Title II ADA on-site evaluation conducted by the ADA Specialist so long as, the building or facility, park and outdoor space is owned, operated or governed by El Paso County.

### *E. Barrier Removal Schedule*

The finalized barrier removal schedule will be based on funding availability. One of the main functions for implementing the Transition Plan will be to assist the ADA Department in identification of annual funding sources. Once funding has been determined, a barrier removal schedule and activities will provide a guidance mechanism for construction activities.

Detailed descriptions of proposed access improvement projects are included in the BlueDAG Master Database. A summary of Capital Improvement Projects will be included in the table of contents.

The access improvement projects are currently forecast and subdivided by three fiscal years, the first part of an expected 10-year implementation plan. The estimate is that the listed periods would yield a high degree of compliance with the Barrier Removal Methods priorities #1, #2 and #3. A breakdown of projects past three years is unreasonable, since conditions experience numerous changes over such a time span. El Paso County anticipates overall compliance is possible in 20 years, depending on financial availability. Current ADA finding repairs are expected to be completed within the current and following two years.

The locations of work are subject to review and recommendations by El Paso County Board of County Commissioners, the ADA Department, Director of Facilities, Transition Plan Implementation and the public. Likewise, it is probable specific locations and project groupings will need to be adjusted among the various years of the plan, after a more detailed review by agencies departments, offices and impact from related construction programs. Note that completed detailed field surveys form the basis of existing conditions requiring correction under the proposed projects. It should also be noted that the detailed reports include projects that may be part of the prospective ADA Transition Plan and funded by other jurisdictions or municipalities.

Estimated costs given in both the detailed and summary tables of improvement projects should be considered preliminary, based upon the unit costs and estimating parameters developed specifically for this ADA Transition Plan. The costs include estimated incidental soft costs, such as engineering, bidding and permitting costs, utilities and other appurtenances and contingencies where applicable.

It's expected the detailed table of improvement projects will not necessarily depict the complete and exact locations of all sidewalk, driveway repair or buildings and other facilities work to be undertaken as part of the ADA Transition Plan, since much of this work will be determined by public input requests and will be evaluated in conjunction with other work or as part of construction projects.

### *F. Funding*

The ADA Transition Plan Implementation Program envisions utilizing, to the maximum extent possible, existing and prospective funding programs and sources. The accessibility improvements and barrier removal will be funded by a variety of funding sources either as stand-alone projects or as a minor component of other projects. Possible funding programs and sources include the following:

Capital Improvement Projects (General Fund), Community Development Block Grants (CDBG), Competitive Grants, and Pikes Peak Regional Transportation Authority (PPRTA).

### *G. Construction Monitoring and Status Reporting*

It is important to assure that codes and standards used to design and construct public right-of-way, buildings and facilities accessibility projects are current and that accessibility improvements are constructed properly and in compliance with all applicable codes and standards. Therefore, the monitoring of construction activities and the

reporting of the status of improvements is vital in assuring an effective overall compliance program. Monitoring and reporting of accessibility construction improvements provides evidence of a good faith effort to comply with legislative and regulatory mandates.

This section details the methods and procedures for monitoring these construction activities and for tracking the status of compliance with the ADA Transition Plan for all construction locations within El Paso County. These methods and procedures are in draft form and will be completed by the ADA Department in concurrence with the Transition Plan Implementation, County working groups, and public input.

*I. Field Construction Inspections and Monitoring*

All Transition Plan accessibility improvements currently being constructed under the jurisdiction of El Paso County are required to be personally inspected by either the ADA Specialist and/or the Department Project Manager or a trained public right of way inspector either employed by or under contract with El Paso County.

*II. Accessibility Standards and Codes*

El Paso County currently utilizes all state and federal accessibility standards and codes in the on-site surveys and remedial efforts. This includes but is not limited to the 2010 ADA Design Standards and state building codes.

Public Right of Way Standards are contained in both the Engineering Criteria Manual and the Land Development Code.

## ***Glossary of Terms***

**Accessible** – A building, facility, or portion thereof that complies with the applicable ADA Standard for Accessible design and 28 C.R.R. 35.151.

**Accessible Means of Egress** – A continuous or unobstructed way of egress travel from any point in a building or facility that provides an accessible route to an area of refuge, a horizontal exit, or a public way.

**Accessible Pedestrian Signal (APS)** – A device that communicates information about the WALK and DON'T WALK phases in audible and vibrotactile formats.

**Accessible Route** – A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Interior accessible routes may include corridors, floors, ramps, elevators, lifts, and clear floor space at fixtures. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

**Alteration** – A change to a building or facility that affects or could affect the usability of the building or facility or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.

**Americans with Disability ACT (ADA)** – The Americans with Disabilities ACT (Pub. L. 101-336, 104 Stat. 327, 42 U.S.C. 12101-12213 and 47 U.S.C. 255 and 611).

**2010 ADA Standards for Accessible Design** – Department of Justice regulations regarding enforceable accessibility standards. These standards set minimum requirements –both scoping and technical- for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It also establishes a revised reference point for State and Local Government Facilities (Title II) that choose to make structural changes to existing facilities to meet their program accessibility requirements. [https://www.ada.gov/2010ADASTandards\\_index.htm](https://www.ada.gov/2010ADASTandards_index.htm)

**Architectural Barriers Act** – Federal law which requires that buildings and facilities that are designed, constructed or altered with Federal funds, or leased by a Federal agency, comply with Federal standards for physical accessibility. 42 U.S.C.A. Ch. 51 §4151-4156.

**Assembly Area** – A building or facility, or portion thereof, used for the purpose of entertainment, educational or civic gatherings, or similar purposes. These areas include, but are not limited to, classrooms, lecture halls, courtrooms, public meeting rooms, public hearing rooms, auditoria, or theaters.

**Auxiliary Aids and Services** – A wide range of services and devices that promote effective communication. The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the length and complexity of the communication involved. Common examples include telephone handset amplifiers, large print, provision of a note taker, and:

1. **Assistive Listening System (ALS)** – An amplification system utilizing transmitters, receivers, and coupling devices to bypass the acoustical space between a sound source and a listener by means of induction loop, radio frequency, infrared, or direct-wired equipment.
2. **Qualified Interpreter** – An interpreter who, via a video remote interpreting (VRI) service or an on-site appearance, is able to interpret effectively, accurately, and impartially, both receptively and expressively, using

any necessary specialized vocabulary, given the deaf or hard of hearing individual's language, skills, and education. Qualified interpreters include, for example, sign language interpreters, oral transliterators, and cued-language transliterators.

3. **Text Telephone/Teletype Terminal/Teletypewriter (TTY)** – A device that allows individuals with hearing disabilities to place calls to standard telephone users via keyboard or assistive device.
4. **Telecommunications Relay Service (TRS)** – An operator service that allows people with hearing disabilities to place calls to standard telephone users via keyboard or assistive device.
5. **Videophone** – A Telephone with a camera and screen for visual, real-time communication.
6. **Video Relay Service (VRS)** – A telephone service using interpreters connected to callers by video hook-up that is designed to provide persons who are deaf and use American Sign Language with telephone services that are functionally equivalent to those provided to users who are hearing.
7. **Video Remote Interpreting (VRI)** – An interpreting service that uses video conference technology over dedicated lines or wireless technology offering a high-speed, wide-bandwidth video connection that delivers high-quality video images as provided in 28 C.F.R. § 35.160(d).

**Barriers** – Natural and/or manmade environmental obstacles that either limit or prevent full access by an individual with disability: physical constraints can include underlying terrain, right-of-way availability, underground structures, adjacent developed facilities, drainage, or the presence of a notable natural or historic feature.

**Corrected Barrier** - Remediated obstacles that either limit or prevent full access by an individual with disability, identified during facility, park or right-of-way evaluation.

**County Engineer** - The County Road Engineer for El Paso County with authority and duties as designated in Colorado Revised Statutes or his/her authorized designee.

**Curb Ramp** – A short ramp cutting through a curb or built up to it. Curb ramps can be perpendicular or parallel, or a combination of parallel and perpendicular ramps.

**Detectable Warning Surfaces** – truncated domes, typically pre-fabricated and installed or stamped into a walkway, providing a tactile surface at the transition from a curb and the street or other hazardous vehicular crossings, assisting pedestrians with vision disabilities in determining when they enter the street.

**Disability** – A physical or mental impairment substantially limiting one or more of the major life activity: a record of such an impairment: or being regarded as having such an impairment.

**ECM Administrator** – The County Engineer or their authorized designee.

**Element** – An architectural or mechanical component of a building, facility, space, site, or public right-of-way.

**Engineering Criteria Manual or ECM** – The manual adopted by the El Paso County Board of County Commissioners for the purposes of setting and revising standards for the design and construction of public improvements and common subdivision or private development, to serve new development, and for repair and reconstruction of existing public improvements.

**Equivalent Facilitation** – The use of designs, products, or technologies as alternatives to specified accessibility requirements that provide substantially equivalent or greater accessibility and usability.

**EPC BoCC** – El Paso County Board of County Commissioners

**Facility** – All or any portion of building, structures, sites, complexes, equipment, rolling stock or other conveyances, roads, walks, passageways, parking lots, or other real estate or property, including the site where the building, property, structure, or equipment is located.

**Fundamental Alteration** – is a change that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered.

**Impairment** – Any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

**Open Barrier Finding** - Obstacles identified that either limit or prevent full access by an individual with disability, during facility, park or right-of-way evaluation.

**Public Building or Facility** – A building or facility or portion of a building or facility designed, constructed, or altered by, on behalf of, or for use of a public entity subject to title II of the ADA and 28 CFR part 35 or to title II of the ADA and 49 CFR 37.41 or 37.43

**Public Entity** – Any state or local government, any department, agency, special purpose district, or other instrumentality of a state or local government, or certain commuter authorities as well as AMTRAK.

**Public Rights-of-Way** – Public land or property, usually in interconnected corridors, acquired for or devoted to transportation purposes.

**Public Use** – Interior or exterior rooms, spaces, or elements made available to the public. Public use may be provided at a building or facility that is privately or publicly owned.

**Qualified Individual With a Disability** - An individual with a disability who, with or without reasonable modification to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for receipt of services or the participation in programs or activities provided by a public entity.

**Reasonable Accommodation** – Changes or adjustments providing, without undue burden, means for an individual with a disability to perform the duties or tasks required. Where existing physical constraints make it impractical for altered elements, spaces, or facilities to reasonably comply with new construction requirements, compliance is required to the extent practicable within the scope of the project.

**Tactile** – An object that can be perceived using the sense of touch.

**Technically Infeasible Barrier** – With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame: or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.

**Transition Plan** – A plan setting forth the steps necessary to complete structural changes to facilities to achieve program access.

**Undue Burden** – Excessive or disproportionate financial and administrative burdens associated with modifying an existing facility and incurred by a covered entity, likely due to factors including, but not limited to, the nature and cost of the action; the overall financial resources of the owner(s); the number of persons employed at the site; the effect on expenses and resources; legitimate safety requirements necessary for safe operation, including crime prevention

measures; or any other impact of the action on the operation of the site; the geographic separateness, and the administrative or fiscal relationship of the site or sites in question to any parent corporation or entity; if applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees; the number, type, and location of its facilities; and if applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity.