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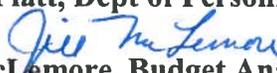
Division of Reclamation,
Mining and Safety

Department of Natural Resources

Virginia Brannon, Division Director
1313 Sherman Street, Room 215
Denver, CO 80203

Date: August 17, 2015

To: Doug Platt, Dept of Personnel and Administration

From:  Jill McLemore, Budget Analyst, Division of Reclamation, Mining and Safety

Re: Comments on Dept of Personnel Rule Changes Related to State Owned Parking Structures

The following are comments from our agency on the proposed rule changes related to the state owned parking areas that will be addressed in the September 1, 2015 public hearing.

2.0 Definitions

2.1 "Agency space" - Proposed change: Agency spaces may not be used for the placement of personally-owned vehicles, or issued by agencies for use by individual employees.

COMMENT: We have field staff who leave their personal vehicles in the parking garage space in place of the state vehicle they take out of town for several days for mine inspections. The drivers move the hang-tag from the state vehicle to their personal vehicle in order for staff who monitor parking areas to know they have a valid tag for that particular parking space. This provides a secure space in which to leave their personal vehicles for trips that may last 3-5 days instead of leaving their personal car in a non-secured public parking lot. It would be helpful if this use of personal vehicles in state parking spaces could be allowed per the rule changes.

~~4.5 Elected officials other than those parking in the State Capitol circle drive, h~~Heads of principal departments shall each be provided one space in the Lincoln Street parking structure without charge.

QUESTION/COMMENT: Does this rule include Division Directors within departments or only the Executive Director for each state department (cabinet positions)? The Division Directors also need ready access to their personal vehicles at times to travel to division related emergencies or events that would warrant a parking space in close proximity to their office buildings and that are paid from state funds. It appears that the reference to 3.1 only allows "state fleet vehicles" be parked in other requested spaces, which would not accommodate a Division Director's personal vehicle. Clarification may be beneficial.



5.1 Each year, DPA conducts a survey of similar parking facilities surrounding the Capitol Complex, and uses that information to set parking rates pursuant to 24-82-103(2), C.R.S.

COMMENT: It would be helpful if a statement was also added to 5.1 that "DPA will work within common policy budget requests for all rate increases to enable state agencies to incorporate cost increases into their budget requests for the following fiscal year." Agencies have to incorporate the increases into their Leased Space common policies funding (general operating funds cannot be used to pay for these costs), and those amounts are set as early as September for the following July/start of a new fiscal year. Example: Our agency has 21 spaces in the Merrick/Lincoln garage, so the last \$30.00 increase per space per month was a \$6,300 change in our leased space common policy budget that was not incorporated into the common policies request cycle. Supplemental legislative requests were required to request the additional state funding.

Thank you for consideration of these comments within your rule making process and for providing us the opportunity to comment.

