


# MEMORANDUM

ADMINISTRATION

**DATE:** May 6, 2021

**TO:** Wendy Root Askew, Board of Supervisors, Chair, District 4  
Luis A. Alejo, Board of Supervisors, District 1  
John M. Phillips, Board of Supervisors, District 2  
Christopher Lopez, Board of Supervisors, District 3  
Mary L. Adams, Board of Supervisors, District 5  
Charles McKee, County Administrative Officer

**FROM:** Todd Keating, Chief Probation Officer 

**SUBJECT:** Status Update on Referral 2017.24  
*Proposal to consolidate the current Youth Center on 970 Circle Drive in east Salinas with the New Juvenile Hall on 1420 Natividad Road and repurpose the property on 970 Circle Drive*

This memo provides a status update on the feasibility of consolidating the Monterey County Youth Center (YC) into the new Juvenile Hall (JH) campus.

## Summary

- The Probation Department provided detailed memos to the Board with updates in January 2019 (during the new Juvenile Hall construction) and August 2020 (upon occupancy of the new facility), which recommended the referral be found infeasible under the current conditions
- The referral was closed in September 2020 and subsequently re-opened in March 2021
- Further information is provided as a complement to the prior memos (attached)
- In addition to the challenges identified in the August 2020 memo, including the realignment of responsibilities from the state to Probation Departments, a fiscal and operational review validates the findings of infeasibility under the current conditions
- The situation is exacerbated by recently passed legislation. SB 823 directs the hard date for the complete closure of all the State Division of Juvenile Justice (DJJ) facilities on June 30, 2023. Any youth still in-custody at that time will become the responsibility of the committing county; consequently, it is expected that additional DJJ youth will complete their court commitments at the local Secure Track Youth Facility, i.e., Juvenile Hall

## Background

Probation manages the only two juvenile institutions in Monterey County.

- Juvenile Hall (JH) was designed to be a short-term local detention facility for youth going through the juvenile court process, with an average stay of 20 days, and is comprised of two 30-bed medium security units and a 20-bed dormitory with a maximum capacity of 80 youth.
- The Youth Center (YC), rated as camp, is a secure residential treatment facility for juvenile male wards, with an average stay of nine (9) months and is comprised of four dormitories with a total capacity of 60 male residents. The YC provides meals and laundry services to both institutions.

The two institutions currently meet the in-custody needs of juvenile offenders in Monterey County.

**Project Description**

Consolidation of the current Youth Center located on 970 Circle Drive in east Salinas with the Juvenile Hall on 1420 Natividad Road, thus resulting in only one secure juvenile facility in Monterey County.

**Departmental Challenges***1. Meeting the rehabilitative needs of Court ordered youth in appropriate settings*

The primary purposes of juvenile detention are accountability and public safety, while providing skill development, habilitation, rehabilitation, addressing treatment needs, and successful reintegration of youth into the community. In recent years there has been a shift from a punitive purpose towards the rehabilitation of offenders. In this context, facilities must provide:

- Opportunities to continue education and access to technology and resources
- Rehabilitative evidence-based programs addressing criminogenic needs
- A variety of support services
- Physical activities and exercise programs
- Allotted visitation with family members
- Medical and mental health services and treatment
- Reentry programs

The current facilities are meeting these requirements at low-capacity levels and within the fiscal capital projects constraints that reduced the original JH scope. These requirements will increase with the implementation of SB 823 in FY 21-22 and the new population being housed locally instead of state custody.

*2. Juvenile Hall under the current configuration is inadequate to meet the disparate needs of four different juvenile populations*

Research and evidence-based practices clearly demonstrate the dangers of mixing populations at different levels of age, offense, and criminogenic needs to the detriment of lower-risk youth.

Juvenile Hall would be the only remaining secure facility, and would have to house four different populations, which would need to be separated in terms of programming (including school/education, therapeutic and rehabilitation), meals and dining, and physical activities and recreation.

- Pre-adjudicated youth, waiting for outcome of Court findings
- Post-adjudicated youth serving short custody dispositions
- Post-adjudicated youth committed to a local secure program or camp (i.e. Youth Center)
- Secure Dispositional Track Treatment Youth (up to age 25) serving longer sentences for very serious crimes

With the implementation of SB 823 – Juvenile Justice Realignment, Juvenile Hall will be designated as the Secure Youth Track Facility for the realigned population of high risk and needs offenders (up to age 23 and some up to age 25) with longer custody times. For this population, the Youth Center would also function as a less restrictive placement option available to the Court when appropriate.

### *3. Insufficient space for mandated programs and services*

After the de-scoping of the original Juvenile Hall project, the current facility bed capacity was reduced from 120 to 80. It currently lacks a distinct secure housing unit with dedicated programming and educational spaces, adequate recreational areas, as well as a kitchen, dining and laundry areas.

Space for programs, services and recreational activities at Juvenile Hall is already limited and cannot accommodate additional disparate populations. Consolidation would create significant space restrictions to Youth Center residents in particular, who currently reside in large dormitory settings and have ample space for outdoor activities, education, and recreational and vocational programs (such as the woodshop).

Further, Juvenile Hall's limited campus would not allow for the proper management of the juvenile populations' wide-ranging assessed risks and needs in terms of classification based on age appropriate services, levels of offense and sophistication, and specialized programming (gender-specific, culturally competent, trauma informed, etc.).

### *4. Impact on the Court due to limited options*

The Youth Center is the only secure residential treatment facility for juvenile male wards in the local community, and the Court has historically relied on this robust multidisciplinary program for high-risk youth, as well as an alternative to state custody at DJJ. The quality of services and atmosphere currently provided at the Youth Center could not be replicated at Juvenile Hall given its physical limitations.

### *5. Possible layoffs of multiple staff with no significant savings*

As Juvenile Hall does not include a kitchen, dining and laundry areas, the Youth Center provides these services for both institutions. By closing the Youth Center, these services would likely need to be provided via contracts with outside vendors.

This would translate in the layoff of 7.5 employees currently providing these services, specifically:

- Sr Cook                      4.5 FTEs
- Head Cook                    1.0 FTE
- Food Administrator       1.0 FTE
- Laundry Worker            1.0 FTE

### *6. Insignificant economies of scale*

A cost analysis of the current YC expenses did not identify significant savings, even if Juvenile Hall could be modified to include the additional required housing and service facilities. Economy of scale is limited to utilities and vehicles, and a small reduction in workforce (one filled Director position at about \$261,788, also generating a layoff), as mandated staffing for custody and programs would require current personnel levels.

Current YC Cost

Total cost \$9.7 Million, of which:

- \$7.7 Million for staffing
- \$1.1 Million for medical services
- \$423,000 for food and dining supplies

Funding Streams:

- General Fund contribution \$5.3 Million
- State reimbursements \$4.4 Million
  - Juvenile Probation Camp Funding (JPCF)
  - Juvenile Probation Activities (JPA)
  - Youth Offender Block Grant (YOBG)
  - Prop 172

*7. Potential loss of JPCF funding for camps*

County allocations for the state's Juvenile Probation Camp Funding (JPCF) Program are calculated based on the average daily population (ADP) of occupied beds in each camp; Monterey is eligible for 2.68% of the total, equal to about \$789,000. The Youth Center is currently rated as camp but would lose that rating should its population be moved to a more restrictive custodial setting without assuring youth could be programmed separately from the Juvenile Hall (including the new Secure Dispositional Track) populations.

**ALTERNATIVES**

One possible long-term option could be the re-design of the current Juvenile Hall facility and campus layout to provide appropriate spaces to include a separate camp, in order to maintain the camp funding, and under the guidance of the state's Board of State and Community Corrections (BSCC).

The redesign would include:

Expanding current Juvenile Hall project:

- Re-establish areas descoped during the new Juvenile Hall project implementation to provide adequate housing space based on classification and necessary ancillary service to include:
  - one secure pod (30 bed) with dedicated education and programming space
  - kitchen and dining area
  - laundry area

Additional Needs

- Enhance spaces for all populations to ensure safety and programmatic separation as appropriate for:
  - Education
  - Vocational
  - Programming
  - Recreation

Cost: TBD

**Recommendation**

The consolidation of the Youth Center with Juvenile Hall on 1420 Natividad Road is not feasible under the current circumstances. SB 823 greatly expanded the juvenile custody span of control for the County and Probation and increased the programmatic requirements for youth committed to local juvenile facilities.

While such a consolidation may have been viable had Juvenile Hall been completed as originally planned, the fact that it was not makes it nearly impossible if programmatic integrity is to be maintained. The monumental responsibilities placed on the County through the passage of SB 823 further exacerbates the situation. Consolidating the Youth Center with Juvenile Hall would do a disservice to the all of the youth under the care and jurisdiction of the Juvenile Court and the Probation Department.

Attachments:

- Memo status report January 2019
- Memo status report August 2020

CC: Dewayne Woods, Assistant County Administrative Officer  
Nick Chiulos, Assistant County Administrative Officer  
Les Girard, County Counsel

# MEMORANDUM

ADMINISTRATION

**DATE:** August 28, 2020

**TO:** Christopher Lopez, Board of Supervisors, Chair, District 3  
Luis A. Alejo, Board of Supervisors, District 1  
John M. Phillips, Board of Supervisors, District 2  
Jane Parker, Board of Supervisors, District 4  
Mary L. Adams, Board of Supervisors, District 5  
Charles McKee, County Administrative Officer

**FROM:** Todd Keating, Chief Probation Officer 

**SUBJECT:** Status Update on Referral 2017.24  
*Proposal to consolidate the current Youth Center on 970 Circle Drive in east Salinas with the New Juvenile Hall on 1420 Natividad Road and repurpose the property on 970 Circle Drive*

This memo provides a status update on the feasibility of consolidating the Monterey County Youth Center (YC) into the new Juvenile Hall (JH) campus, once completed.

Juvenile Hall is a short-term local detention facility for youth going through the juvenile court process, with an average stay of 20 days. The Youth Center, rated as camp, is a long-term secure residential treatment facility for juvenile male wards, with an average stay of nine (9) months.

In January 2019, former Chief Probation Officer Marcia Parsons sent a memo to your Board highlighting some of the challenges of consolidating the two institutions (attached) and indicating that a more informed recommendation could be made upon the completion of Phase I. During Phase I, originally scheduled for Summer 2019, JH residents would have been moved into the new housing units to allow for the rest of construction to take place. The Youth Center would have continued to provide food services to JH, as the new kitchen was part of Phase II, originally projected for Spring 2020 at the earliest.

Since then, and with the approval of the Board of State and Community Corrections (BSCC), the project's scope has been significantly modified by:

- a. Removing Building 2, a 30-bed high security housing unit with dedicated classroom, and reducing the 30-bed dormitory to 20 beds, thereby reducing total capacity from 120 to 80 youth; and
- b. Eliminating Building 5 (kitchen, dining area, laundry, maintenance shop, and storage).

The revised facility also includes the demolition of all existing buildings, all new site work including outdoor recreation, and the addition of a modular/portable building for institutional storage. The current recreation areas (indoor and outdoor) meet the State's Title 24 requirements.

The new plan retains three housing units: Units B and C, each a 30-bed standard-security housing with single and double rooms, and Unit D (Dorm), the renovation of the existing 30-bed dormitory housing, reduced to 20 beds. The new plan also retains four classrooms and the gymnasium.

### Issues and Challenges

#### 1. Current and future capacity

Although the total number of beds would appear to accommodate the *current* occupancy levels of JH and YC, the new facility is not designed to house two distinct populations with unique programming needs. Therefore, many issues would need to be assessed and/or resolved to ensure that youth receive the appropriate and legislatively mandated levels of supervision and programs, and that the rehabilitative function of the Youth Center program not be compromised.

It is important to note that the current population at Juvenile Hall and the Youth Center is artificially low (combined 58 as of 8/27/2020) due to the COVID-19 situation. The average combined daily population pre-COVID over the past 5 years had been 84 youth.

Further, the proposed closure of DJJ poses a new, major dilemma. While county facilities *might* be able to provide beds, they are designed for short-term stays, between 20 to 35 days, while the length of stay in DJJ is typically a minimum of two years. Although youth enter DJJ for offenses committed prior to turning 18, some can remain in the juvenile facilities until their 25th birthday. Juvenile Hall currently houses youth up to 19 years old. It is not designed or equipped with appropriate space to provide recreation, rehabilitation, treatment, and vocational programming, or education to older students such as those currently housed at State institutions, who have been adjudicated for serious offenses and have a higher level of needs.

#### 2. Appropriate housing and programming for each population

The elimination of Building 2 (30 high security beds and dedicated classroom) negates the ability to appropriately segregate each institution's population for programming purposes, which would jeopardize the annual camp funding allocated to the YC (approximately \$525,000/year, based on average daily population).

Other jurisdictions that have successfully consolidated juvenile hall(s) and camp(s) on the same campus had the ability to appropriately segregate and program the populations due to the physical layout of the facility. While the new Juvenile Hall as originally designed might have been able to accommodate a dual populace with some modifications, the current design makes that venture a virtual impossibility.

#### 3. Different Primary Focuses/ Purposes/ Length of Stay

The two institutions have different purposes: for JH the focus is on Detention, with a short average stay of about 20 Days, and for YC it is Rehabilitation, with a longer average stay of nine (9) months.

#### 4. Negative impact of commingling high risk and lower risk offenders

Evidence-based and best practices have documented the negative impact on lower level offenders when commingled with high-level ones. Further, research indicates that programs must be tailored to the offender risk level, and that placing high- and low-risk offenders together is ill-advised.

#### 5. Lack of adequate space resources for Supportive and Rehabilitative Programs

This will include: Mental Health; Education; Medical services; Counseling (individual and group), Visits (parents, faith, legal counsel, etc.) and Programs. All long-term programs currently provided at YC would need to continue if transferred to the new facility; further, the consolidation would jeopardize the current YC program design, based on the Missouri Model, a recognized best practice. Youth is housed in small, family-like dorm settings (no individual cells) and functions as a family nucleus in all daily activities.

A letter from BSCC dated August 20, 2018 indicated that YC programs must be kept separate from JH programming, and that services provided to the YC camp residents would need to be clearly documented pursuant to the specific requirements of Welfare and Institutions Code (WIC) 18221.

#### 6. Additional Staffing

The same BSCC letter indicated that minimum staffing ratios for *both* facilities would require a ratio of 1 (staff):10 (residents) during waking hours, and 1:30 during sleeping hours. The colocation would increase staffing needs for the Youth Center, which is currently at 1:15 during waking hours, as the physical facility will be a secure location. BSCC would continue to view JH and YC as two separate facilities for annual inspection purposes, even if located on the same campus.

#### Current trends in Juvenile Justice:

1. Juvenile incarceration rates have steadily declined since 2007, as local policy decisions and California legislation have focused on rehabilitation rather than punishment.
2. DJJ Realignment significantly restricted the type of youth who could be committed to State facilities and provided funding to house youth no longer eligible for DJJ commitment in local detention facilities. Consequently, local jurisdictions had to house and/or manage youth whose risk factors were higher and needs more complex than in the past. In Monterey County, the Youth Center is the only secure treatment facility available to manage these offenders.
3. The State is planning to close all State Division of Juvenile Justice (DJJ) facilities, currently housing the highest risk and highest needs youth. These youth would likely complete their sentences in local facilities of the committing counties. As of August 27, 2020, Monterey had 30 youth at DJJ, with two more pending transfer from Juvenile Hall.

#### Recommendation

The consolidation of the current Youth Center on 970 Circle Drive in east Salinas with the New Juvenile Hall on 1420 Natividad Road is not feasible under the current conditions and might create additional strain on limited fiscal and staffing resources as the consolidation of YC into the new JH will require additional staffing to meet the higher BSCC ratios for YC staff.



Due to the elimination of Building 5 (kitchen, laundry, storage), these services, tailored to the nutritional needs of youth and based on federal and State requirements, will need to continue to be provided off-site by YC staff.

Further, the pending State decision to end new youth admissions to DJJ as perhaps as early as January 2021, and ultimately closing all four state-run facilities, lends a new level of complexity to the safe and secure housing of youthful offenders at the local level.

Attachments:

- Memo Referral Status Update dated January 16, 2019

Cc: Carl Holm, RMA Director

# MEMORANDUM

ADMINISTRATION

**DATE:** January 16, 2019

**TO:** John M. Phillips, Board of Supervisors, Chair, District 2  
Luis A. Alejo, Board of Supervisors, District 1  
Christopher Lopez, Board of Supervisors, District 3  
Jane Parker, Board of Supervisors, District 4  
Mary L. Adams, Board of Supervisors, District 5  
Lew Bauman, County Administrative Officer

**FROM:** Marcia Parsons, Chief Probation Officer

**SUBJECT:** Status Update on Referral 2017.24  
*Proposal to consolidate the current Youth Center on 970 Circle Drive in east Salinas with the New Juvenile Hall on 1420 Natividad Road and repurpose the property on 970 Circle Drive*

This memo provides a status update on the activities conducted to date to assess the feasibility of consolidating the Monterey County Youth Center (YC) into the new Juvenile Hall (JH) campus, once completed.

Juvenile Hall is a short-term local detention facility for youth going through the juvenile court process, with an average stay of 20 days. The Youth Center, rated as camp, is a long-term secure residential treatment facility for juvenile male wards, with an average stay of 9 months.

## Background Information

An initial assessment conducted by consultant Art Lytle, Sr. Project Manager at Kitchell CEM, on August 22, 2017 recommended against consolidation of the two facilities to avoid risking current SB 81 State funding in the amount of \$35 Million and having to formulate a new scope of work with additional costs.

Later, the Department initiated a series of conversations with the State correctional authority, the Board of State and Community Corrections (BSCC), which culminated in a site visit to the current and planned facility for feedback on the possible consolidation upon the completion of the new Juvenile Hall facility.

A letter from BSCC dated August 20, 2018 indicated that:

- There are no Title 15 or Title 24<sup>1</sup> restrictions regarding co-mingling the two populations: 1) pre and post disposition youth in detention at JH, and 2) committed youth at YC.
- There are no requirements for a formal scope of work change, based on the documentation reviewed by BSCC.
- The consolidation would not jeopardize the SB 81 funding committed to the new JH construction (\$35 Million), nor the annual camp funding allocated to the YC (about

---

<sup>1</sup> Title 15 and 24 of the California Code of Regulations establish minimum standards for local juvenile detention facilities, both in terms of operations and the physical facility.

\$525,000/year, based on average daily population), provided that the YC programs continued and were kept separate from JH programming.

- Services provided to the YC camp residents would need to be clearly documented pursuant to the specific requirements of Welfare and Institutions Code (WIC) 18221.
- Minimum staffing ratios for both facilities would require 1 (staff):10 (residents) during waking hours and 1:30 during sleeping hours. The colocation will increase staffing needs for the Youth Center, which is currently at 1:15 during waking hours, as the physical plant will be a secure location.
- BSCC will continue to view JH and YC as two separate facilities for annual inspection purposes, even if located on the same campus.
- Probation was encouraged to carefully review the positive and negative operational impacts of operating both facilities on the same campus.

### Facility Design

The completed 120-bed facility will be laid out in a campus style design with a central 1-1/4 acre recreation yard surrounded by four housing buildings (with 30 beds each) and support buildings.

The four housing buildings consist of:

- Unit A (High Security): new 30-bed high security housing with single and double rooms and a larger perimeter for on-unit classrooms and medical exam room
- Unit B: new 30-bed medium-security housing with single and double rooms
- Unit C: new 30-bed medium-security housing with single and double rooms
- Unit D - Dorm: renovation of the existing 30-bed dormitory housing, with existing day room and programming space retained.

Although the total number of beds would appear to accommodate the *current* occupancy levels of JH and YC, the new facility is not designed to house two separate populations. Therefore, many issues would need to be assessed and/or resolved to ensure that youth receive the appropriate and legislatively mandated levels of supervision and programs, and that the rehabilitative function of the Youth Center program is not compromised.

The existing Youth Center is designed based on the Missouri Model<sup>2</sup>, a recognized best practice. Youth is housed in small, family-like dorm settings (no individual cells) and functions as a family nucleus in all daily activities.

Further, research<sup>3</sup> indicates that programs must be tailored to the offender risk level as “*the same program that reduced recidivism for higher-risk offenders actually increased for low-risk offenders*” and that “*When we take low-risk offenders, who by definition are fairly pro-social, and place them in a highly structured, restrictive program, we actually disrupt the factors that make them low-risk .... “practically speaking, placing high- and low-risk offenders together is never a good idea”*”.

### Issues and Constraints

---

<sup>2</sup> The Missouri Model is a therapeutic, trauma-informed approach to youth development addressing root causes of juvenile delinquency to assist them in making lasting behavioral changes and prepare them for successful transitions back to the community.

<sup>3</sup> “Understanding the Risk Principle: How and Why Correctional Interventions Can Harm Low-Risk offenders” - Christopher Lowenkamp and Edward Latessa, University of Cincinnati, 2004

1. Current versus future capacity
2. Appropriate housing for each population
3. Different Primary Focuses/ Purposes/ Length of Stay
  - a. JH = Detention (Short Avg Stay, 20 Days)
  - b. YC = Rehabilitation (Long Avg Stay, 9 Months)
4. Negative impact of co-mingling high risk and lower risk offenders
5. Logistics of staggering educational services
6. Logistics of staggering meals
7. Adequate space resources for:
  - a. Mental Health
  - b. Education
  - c. Medical services
  - d. Counseling (individual and group)
  - e. Programs – all long-term programs currently provided at YC will need to continue if transferred to new facility
  - f. Visits (parents, faith, legal counsel, etc.)
8. The consolidation would jeopardize the current YC program design, based on the Missouri Model.
9. Other jurisdictions that have consolidated juvenile hall(s) and camp(s) on the same campus have been able to physically segregate the populations (e.g. via fencing).

#### Interim Recommendation

At this time, the completion of Phase I of the project is scheduled for Summer 2019; once completed, JH residents will be moved into the new housing units to allow for the rest of construction to take place. The Youth Center will continue to provide food services to JH, as the new kitchen is part of Phase II, currently projected for Spring 2020 at the earliest.

As the project has suffered on-going delays and many co-locations issues have not been resolved, it is premature to provide a recommendation of the practical feasibility of colocation. The Department will continue to monitor current trends, assess constraints, and develop more informed final recommendations.

#### Current trends in Juvenile Justice:

1. Juvenile incarceration rates have steadily declined since 2007, as new California legislation has been focused on rehabilitation rather than punishment.
2. DJJ Realignment significantly restricted the type of youth who could be committed to State facilities and provided funding to house youth no longer eligible for DJJ commitment in local detention facilities. Consequently, local jurisdictions had to house and/or manage youth whose risk factors were higher and needs more complex than in the past. In Monterey County, the Youth Center is the only secure treatment facility available to manage these offenders.
3. Efforts have been made at the State level to close all State Division of Juvenile Justice (DJJ) facilities, currently housing the highest risk and highest needs youth. These youth would complete their sentence in local facilities of the committing counties. As of November 2018, Monterey had 26 youth in DJJ; presently, 6 more are pending transfer. The passing of Prop 57 could also augment this number.

4. As the new JH facility is constructed to last for the next 50-60 years, it would need to allow for possible changes in trend from a “smart on crime” to “tough on crime” culture requiring the use of more if not all available bed capacity.

Next Status Update

A new status update is planned after the completion of Phase I.

Attachments:

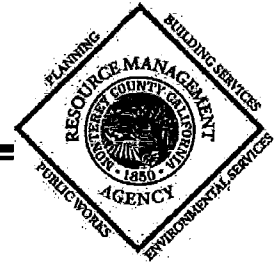
- Arthur Lytle Memo dated August 22, 2017
- BSCC Letter dated August 20, 2018

Cc: Carl Holm, RMA Director

# MONTEREY COUNTY

## RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Director



Building Services / Environmental Services / Planning Services / Public Works & Facilities  
1441 Schilling Place, 2nd Floor  
Salinas, California 93901  
(831)755-4800  
[www.co.monterey.ca.us/rma](http://www.co.monterey.ca.us/rma)

### MEMORANDUM

**Date:** August 22, 2017

**To:** Manuel Gonzalez, Assistant CAO

**From:** Arthur Lytle

**Subject:** New Juvenile Hall Scope and Funding

#### Introduction

This memorandum addresses the feasibility of co-locating the Monterey County Youth Center with the New Juvenile Hall Project which is funded through SB 81 grant funds and currently under construction.

This memorandum evaluates the scope and budget of the New Juvenile Hall Project as approved by the California Department of Finance and the State Public Works Board; the SB 81 funding mechanism and the restrictions on reimbursable expenditures; as well as the, design and construction challenges for co-locating the facilities.

In light of the factors considered, this memorandum concludes that co-locating the Monterey County Youth Center with the New Juvenile Hall Project is not feasible without considerable new investment by the County, potentially risking current SB 81 funding for the New Juvenile Hall Project, and potential delay and claims flowing from impacts of modifying the New Juvenile Hall Project.

#### Approved Project Scope and Budget:

The New Juvenile Hall Project was approved by the State of California Department of Finance and the State Public Works Board (collectively, the "State") as a 120 bed local youthful offender rehabilitative facility with a total project budget of \$58,671,291.00. The State approved design provides four different housing units, which allow for greater classification, treatment with respect and dignity to support the rehabilitative needs of the youth confined to the Juvenile Hall, and implementing "Best Practices" in Juvenile Hall design.

The new Juvenile Hall project received SB 81 grant in the amount of \$35,000,000.00 to reimburse the County for construction costs only. The remaining \$23,617,291.00 is funded by a County match.

#### County SB 81 Award:

The County's SB 81 award of \$35,000,000 is a State commitment to a Pooled Money Investment Account (PMIA) established in the County's name. The money in the PMIA is a prorated amount based

on a twelve-month cash flow projection and is replenished on July 1<sup>st</sup> of each fiscal year until the grant is satisfied.

The grant funding is only allocated to the County as construction on the New Juvenile Hall progresses. The State is required to review and approval of construction invoicing prior to reimbursing the County.

The County invoices the State for reimbursement after the Contractor submits a pay request to the County. Upon approval by the State of the request for payment, a reimbursement will be made to the County within 30 days.

The State also retains five percent of the grant amount (\$1,750,000) until an occupancy permit is issued and the independent audit by the County is completed and approved. At this point in the project the State will issue Lease Revenue Bonds for sale to repay the PMIA, this starts the Debt period

### **County SB 81 Obligations for Design Changes and Budget Overruns**

The County's Project Delivery and Construction Agreement (the "Agreement") with the State Public Works Board of the State of California (the "Board") conditions the County's eligibility for funding under SB 81.

Specifically, the County has agreed that "the Project shall be constructed and completed in accordance with [the] Project scope, cost and schedule established by the Board (Section 1.2.C). Modifications to the Board's previous approvals must be approved, in writing, by the State Department of Finance and the Board (Section 4.2). The Agreement further provides that no scope, cost, or budget changes will be authorized that would cause the Total Project Costs to increase (unless the County covenants to fund such additional costs from lawfully available funds and dutifully allocates such funds) (Section 4.3).

As outlined above, the County has been successful previously in securing the Board's approval of changes to the project scope. Notably, however, those changes were prior to the award of a construction contract and prior to any actual construction. The potential co-location of the Youth Center with the new Juvenile Hall, however, would likely be considered a completely new project rather than a modification of the currently approved project scope. As a new project, the County would risk losing the current SB 81 funding.

### **Potential Impacts to Construction**

The co-location of the Youth Center with the New Juvenile Hall, after project approvals and the start of construction, would require significant additional funding from the County of Monterey, would likely jeopardize the current SB 81 grant funding, and would likely result in significant delay and claims for damages.

Should the County choose to incorporate the Youth Center into the New Juvenile Hall, the County would be required to: 1) undertake the master planning of the two co-located facilities; 2) redesign the new Juvenile Hall campus; 3) protect and modify the in-place construction, and; 4) terminate the current Juvenile Hall construction contract for the convenience of the County.

A County funded co-location masterplan would be required to demonstrate how the two facilities and their respective administrations and populations could utilize the limited 9.2-acre site. The masterplan would also assess how to incorporate the programming space of the recently completed \$1,800,000 Salinas Valley Education Center which is located behind the current Youth Center. Due to the limited site, separate populations, and programming needs, the masterplan would require a complete re-design of

the current Juvenile Hall project design and layout. The required master planning and redesign could reasonably require 15 to 24 months and add millions of dollars to the overall project budget.

Construction has started at the new Juvenile Hall project with utility relocation, temporary fencing, grading and installation of foundation drilled caissons. Due to the likely redesign, the in-place construction would need to be protected, modified, or removed. Some of the work, such as the utility relocation work, will have a significant impact on the Jail Expansion project, as that facility is designed to share common utility corridors with the new Juvenile Hall. The in-ground construction is traditionally the most expensive part of new construction because the actual sub-surface conditions and utility locations cannot be known with complete accuracy until the work already takes place. In order to co-locate facilities, the County will have incurred significant costs in the new Juvenile Hall project only to abandon that work and incur additional costs to perform the same work pursuant to a new design.

Due to the time required to complete a new design, and the significant change in work, the County would need to terminate of the current New Juvenile Hall construction contract. While the contract allows the County to terminate without cause, it requires that the County pay for all work currently completed, certain materials ordered or delivered to the site and, the preservation of certain work. In addition to the hard costs incurred by the contractor, County could also face liability for claims from both the contractor and subcontractors for lost profits.

### **Conclusion**

At this late stage, we recommend the County not jeopardize the SB81 grant funding or incur the additional significant costs associated with redesigning the current new Juvenile Hall project, abandoning the in-place construction and possibly terminating the current construction contract. Once the construction project is closed out and if bed counts continues to decrease there may be opportunity to explore alternative uses for empty beds should the detention population remain low.

Another option for relocation of the County Youth Center may be at the 1935 Juvenile Hall, which is currently vacant and located at the corner of Natividad and Chaparral. This property may be suitable for adapted reuse as a new Youth Center. The original 3,885 square foot main building may be suitable for the administration building. Further, modifications to the 1935 Juvenile Hall building might require the demolition of the 2,575 square feet addition and development of new housing and program buildings. This potential location for the Youth Center is more convenient to the New Juvenile Hall to provide food service and laundry to the Youth Center. .





LINDA M. PENNER  
*Chair*

KATHLEEN T. HOWARD  
*Executive Director*

STATE OF CALIFORNIA

**BOARD OF STATE AND COMMUNITY CORRECTIONS**

2590 VENTURE OAKS WAY, SUITE 200 • SACRAMENTO CA 95833 • 916.445.5073 • BSCC.CA.GOV



EDMUND G. BROWN, JR.  
*Governor*

MONTEREY COUNTY PROBATION  
DEPARTMENT ADMINISTRATION

AUG 24 2018

RECEIVED

August 20, 2018

Monterey County Probation Department  
Marsha Parsons, Chief Probation Officer  
20 East Alisal Street  
Salinas, California 93901

Dear Chief Parsons:

This correspondence is in reference to your request for information and clarification regarding the option of housing the Monterey County Youth Center (MYC) program within the confines of the new Juvenile Hall (JH) once built. Our response is based on information known at this time and we also recommend that you contact your county counsel for legal opinion as needed.

Monterey County is in the process of building a 57 million-dollar, 120 bed replacement Juvenile Hall. Thirty-five million dollars has been allocated through state funding from SB 81, Round 1. The new juvenile hall project is all new construction with the exception of the dorm, which will be fully renovated and will be used as part of the project and rated bed space.

The following is intended to provide information to assist you in your decision-making process and provides guidance as appropriate.

1. The original Project Scope Summary describes the project as a juvenile facility and does not specifically note the specific facility operation. We have shared your request for information with our Construction Financing Division who have in turn had initial conversations with the Department of Corrections and Rehabilitation (CDCR) and the California Department of Finance (DOF) regarding the potential or option of housing the MYC Program within the Juvenile Hall and whether this potential operational change would constitute a formal scope change. CDCR requested a proposed project scope update, noting any potential change requested to the project. Upon their review, it was determined that there will be no requirement for a formal scope change request based on the documentation reviewed.
2. The Juvenile Hall currently houses pre and post disposition youth in detention. MYC currently houses youth committed by the Monterey Superior Court to a camp commitment. There are no Title 15 or Title 24 regulatory issues concerning the comingling of detention youth and committed youth in a juvenile facility and therefore, nothing that would preclude you from doing so. There are no sight and sound separation issues that will need to be addressed as all youth detained in the facility will be age appropriate, under the jurisdiction of the Juvenile Court and have an open, juvenile case.

We encourage you to review the potential operational impact of operating both facilities within the same building. There will be both positive and negative operational impacts of doing so. We suggest that you conduct a full analysis and ensure that you calculate for

additional staffing, other resources or unintended operational impact to the operations of both facilities so that your facilities remain in compliance with Title 15 and Title 24.

3. Your agency/county receives Juvenile Probation Camp Funding. County allocations are calculated based on the average daily population (ADP) of occupied beds in the "camp" as reported to the BSCC in the previous fiscal year. This means you will receive an allocation based on youth in the program.

Currently, your allocation for Monterey County is 1.8 %. The budget and the funding available statewide is set by State budget. If the state funding and your ADP remain constant, your funding should remain constant. If either state funding or your ADP should change, your allocation will change as well.

4. The California Welfare and Institutions Code (WIC 18221) is very specific to the services that are authorized relative to the Monterey Youth Center, and it will be important for your facility staff to ensure that these services are documented. As you intend to provide a separate space/unit for your camp youth, it is anticipated that this will not be an issue; however, in the event that the camp capacity will increase, this will be an issue that will need to be addressed.
5. Both the MYC and the JH will be viewed as separate facilities for inspection purposes and will have their own identifying state number even though they will be located in the same building. It will be advantageous for you to ensure that your paperwork is kept separately for inspection purposes. Title 15 and Title 24 will still apply to both facilities as it does currently and staffing ratios for both facilities will be required to be maintained at 1 staff to 10 youth during waking hours and 1 staff to 30 youth during sleeping hours as the physical plant will be that of secure detention. This will be an increase in staffing requirements for the MYC.

We appreciate the opportunity to be of assistance and if you have any further questions, please do not hesitate to contact me at [lisa.southwell@bscc.ca.gov](mailto:lisa.southwell@bscc.ca.gov) or by phone at (916) 322-1638.

Sincerely,



Lisa Southwell,  
BSCC Field Representative

# MEMORANDUM

ADMINISTRATION

**DATE:** January 16, 2019

**TO:** John M. Phillips, Board of Supervisors, Chair, District 2  
Luis A. Alejo, Board of Supervisors, District 1  
Christopher Lopez, Board of Supervisors, District 3  
Jane Parker, Board of Supervisors, District 4  
Mary L. Adams, Board of Supervisors, District 5  
Lew Bauman, County Administrative Officer

**FROM:** Marcia Parsons, Chief Probation Officer

**SUBJECT:** Status Update on Referral 2017.24  
*Proposal to consolidate the current Youth Center on 970 Circle Drive in east Salinas with the New Juvenile Hall on 1420 Natividad Road and repurpose the property on 970 Circle Drive*

This memo provides a status update on the activities conducted to date to assess the feasibility of consolidating the Monterey County Youth Center (YC) into the new Juvenile Hall (JH) campus, once completed.

Juvenile Hall is a short-term local detention facility for youth going through the juvenile court process, with an average stay of 20 days. The Youth Center, rated as camp, is a long-term secure residential treatment facility for juvenile male wards, with an average stay of 9 months.

## Background Information

An initial assessment conducted by consultant Art Lytle, Sr. Project Manager at Kitchell CEM, on August 22, 2017 recommended against consolidation of the two facilities to avoid risking current SB 81 State funding in the amount of \$35 Million and having to formulate a new scope of work with additional costs.

Later, the Department initiated a series of conversations with the State correctional authority, the Board of State and Community Corrections (BSCC), which culminated in a site visit to the current and planned facility for feedback on the possible consolidation upon the completion of the new Juvenile Hall facility.

A letter from BSCC dated August 20, 2018 indicated that:

- There are no Title 15 or Title 24<sup>1</sup> restrictions regarding co-mingling the two populations: 1) pre and post disposition youth in detention at JH, and 2) committed youth at YC.
- There are no requirements for a formal scope of work change, based on the documentation reviewed by BSCC.
- The consolidation would not jeopardize the SB 81 funding committed to the new JH construction (\$35 Million), nor the annual camp funding allocated to the YC (about

---

<sup>1</sup> Title 15 and 24 of the California Code of Regulations establish minimum standards for local juvenile detention facilities, both in terms of operations and the physical facility.

\$525,000/year, based on average daily population), provided that the YC programs continued and were kept separate from JH programming.

- Services provided to the YC camp residents would need to be clearly documented pursuant to the specific requirements of Welfare and Institutions Code (WIC) 18221.
- Minimum staffing ratios for both facilities would require 1 (staff):10 (residents) during waking hours and 1:30 during sleeping hours. The colocation will increase staffing needs for the Youth Center, which is currently at 1:15 during waking hours, as the physical plant will be a secure location.
- BSCC will continue to view JH and YC as two separate facilities for annual inspection purposes, even if located on the same campus.
- Probation was encouraged to carefully review the positive and negative operational impacts of operating both facilities on the same campus.

### Facility Design

The completed 120-bed facility will be laid out in a campus style design with a central 1-1/4 acre recreation yard surrounded by four housing buildings (with 30 beds each) and support buildings.

The four housing buildings consist of:

- Unit A (High Security): new 30-bed high security housing with single and double rooms and a larger perimeter for on-unit classrooms and medical exam room
- Unit B: new 30-bed medium-security housing with single and double rooms
- Unit C: new 30-bed medium-security housing with single and double rooms
- Unit D - Dorm: renovation of the existing 30-bed dormitory housing, with existing day room and programming space retained.

Although the total number of beds would appear to accommodate the *current* occupancy levels of JH and YC, the new facility is not designed to house two separate populations. Therefore, many issues would need to be assessed and/or resolved to ensure that youth receive the appropriate and legislatively mandated levels of supervision and programs, and that the rehabilitative function of the Youth Center program is not compromised.

The existing Youth Center is designed based on the Missouri Model<sup>2</sup>, a recognized best practice. Youth is housed in small, family-like dorm settings (no individual cells) and functions as a family nucleus in all daily activities.

Further, research<sup>3</sup> indicates that programs must be tailored to the offender risk level as “*the same program that reduced recidivism for higher-risk offenders actually increased for low-risk offenders*” and that “*When we take low-risk offenders, who by definition are fairly pro-social, and place them in a highly structured, restrictive program, we actually disrupt the factors that make them low-risk .... “practically speaking, placing high- and low-risk offenders together is never a good idea”*”.

### Issues and Constraints

---

<sup>2</sup> The Missouri Model is a therapeutic, trauma-informed approach to youth development addressing root causes of juvenile delinquency to assist them in making lasting behavioral changes and prepare them for successful transitions back to the community.

<sup>3</sup> “Understanding the Risk Principle: How and Why Correctional Interventions Can Harm Low-Risk offenders” - Christopher Lowenkamp and Edward Latessa, University of Cincinnati, 2004

1. Current versus future capacity
2. Appropriate housing for each population
3. Different Primary Focuses/ Purposes/ Length of Stay
  - a. JH = Detention (Short Avg Stay, 20 Days)
  - b. YC = Rehabilitation (Long Avg Stay, 9 Months)
4. Negative impact of co-mingling high risk and lower risk offenders
5. Logistics of staggering educational services
6. Logistics of staggering meals
7. Adequate space resources for:
  - a. Mental Health
  - b. Education
  - c. Medical services
  - d. Counseling (individual and group)
  - e. Programs – all long-term programs currently provided at YC will need to continue if transferred to new facility
  - f. Visits (parents, faith, legal counsel, etc.)
8. The consolidation would jeopardize the current YC program design, based on the Missouri Model.
9. Other jurisdictions that have consolidated juvenile hall(s) and camp(s) on the same campus have been able to physically segregate the populations (e.g. via fencing).

#### Interim Recommendation

At this time, the completion of Phase I of the project is scheduled for Summer 2019; once completed, JH residents will be moved into the new housing units to allow for the rest of construction to take place. The Youth Center will continue to provide food services to JH, as the new kitchen is part of Phase II, currently projected for Spring 2020 at the earliest.

As the project has suffered on-going delays and many co-locations issues have not been resolved, it is premature to provide a recommendation of the practical feasibility of colocation. The Department will continue to monitor current trends, assess constraints, and develop more informed final recommendations.

#### Current trends in Juvenile Justice:

1. Juvenile incarceration rates have steadily declined since 2007, as new California legislation has been focused on rehabilitation rather than punishment.
2. DJJ Realignment significantly restricted the type of youth who could be committed to State facilities and provided funding to house youth no longer eligible for DJJ commitment in local detention facilities. Consequently, local jurisdictions had to house and/or manage youth whose risk factors were higher and needs more complex than in the past. In Monterey County, the Youth Center is the only secure treatment facility available to manage these offenders.
3. Efforts have been made at the State level to close all State Division of Juvenile Justice (DJJ) facilities, currently housing the highest risk and highest needs youth. These youth would complete their sentence in local facilities of the committing counties. As of November 2018, Monterey had 26 youth in DJJ; presently, 6 more are pending transfer. The passing of Prop 57 could also augment this number.

4. As the new JH facility is constructed to last for the next 50-60 years, it would need to allow for possible changes in trend from a “smart on crime” to “tough on crime” culture requiring the use of more if not all available bed capacity.

Next Status Update

A new status update is planned after the completion of Phase I.

Attachments:

- Arthur Lytle Memo dated August 22, 2017
- BSCC Letter dated August 20, 2018

Cc: Carl Holm, RMA Director

# MONTEREY COUNTY

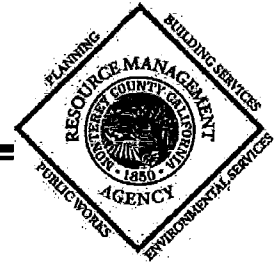
## RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Director

Building Services / Environmental Services / Planning Services / Public Works & Facilities  
1441 Schilling Place, 2nd Floor  
Salinas, California 93901

(831)755-4800

[www.co.monterey.ca.us/rma](http://www.co.monterey.ca.us/rma)



### MEMORANDUM

**Date:** August 22, 2017

**To:** Manuel Gonzalez, Assistant CAO

**From:** Arthur Lytle

**Subject:** New Juvenile Hall Scope and Funding

#### Introduction

This memorandum addresses the feasibility of co-locating the Monterey County Youth Center with the New Juvenile Hall Project which is funded through SB 81 grant funds and currently under construction.

This memorandum evaluates the scope and budget of the New Juvenile Hall Project as approved by the California Department of Finance and the State Public Works Board; the SB 81 funding mechanism and the restrictions on reimbursable expenditures; as well as the, design and construction challenges for co-locating the facilities.

In light of the factors considered, this memorandum concludes that co-locating the Monterey County Youth Center with the New Juvenile Hall Project is not feasible without considerable new investment by the County, potentially risking current SB 81 funding for the New Juvenile Hall Project, and potential delay and claims flowing from impacts of modifying the New Juvenile Hall Project.

#### Approved Project Scope and Budget:

The New Juvenile Hall Project was approved by the State of California Department of Finance and the State Public Works Board (collectively, the "State") as a 120 bed local youthful offender rehabilitative facility with a total project budget of \$58,671,291.00. The State approved design provides four different housing units, which allow for greater classification, treatment with respect and dignity to support the rehabilitative needs of the youth confined to the Juvenile Hall, and implementing "Best Practices" in Juvenile Hall design.

The new Juvenile Hall project received SB 81 grant in the amount of \$35,000,000.00 to reimburse the County for construction costs only. The remaining \$23,617,291.00 is funded by a County match.

#### County SB 81 Award:

The County's SB 81 award of \$35,000,000 is a State commitment to a Pooled Money Investment Account (PMIA) established in the County's name. The money in the PMIA is a prorated amount based

on a twelve-month cash flow projection and is replenished on July 1<sup>st</sup> of each fiscal year until the grant is satisfied.

The grant funding is only allocated to the County as construction on the New Juvenile Hall progresses. The State is required to review and approval of construction invoicing prior to reimbursing the County.

The County invoices the State for reimbursement after the Contractor submits a pay request to the County. Upon approval by the State of the request for payment, a reimbursement will be made to the County within 30 days.

The State also retains five percent of the grant amount (\$1,750,000) until an occupancy permit is issued and the independent audit by the County is completed and approved. At this point in the project the State will issue Lease Revenue Bonds for sale to repay the PMIA, this starts the Debt period

### **County SB 81 Obligations for Design Changes and Budget Overruns**

The County's Project Delivery and Construction Agreement (the "Agreement") with the State Public Works Board of the State of California (the "Board") conditions the County's eligibility for funding under SB 81.

Specifically, the County has agreed that "the Project shall be constructed and completed in accordance with [the] Project scope, cost and schedule established by the Board (Section 1.2.C). Modifications to the Board's previous approvals must be approved, in writing, by the State Department of Finance and the Board (Section 4.2). The Agreement further provides that no scope, cost, or budget changes will be authorized that would cause the Total Project Costs to increase (unless the County covenants to fund such additional costs from lawfully available funds and dutifully allocates such funds) (Section 4.3).

As outlined above, the County has been successful previously in securing the Board's approval of changes to the project scope. Notably, however, those changes were prior to the award of a construction contract and prior to any actual construction. The potential co-location of the Youth Center with the new Juvenile Hall, however, would likely be considered a completely new project rather than a modification of the currently approved project scope. As a new project, the County would risk losing the current SB 81 funding.

### **Potential Impacts to Construction**

The co-location of the Youth Center with the New Juvenile Hall, after project approvals and the start of construction, would require significant additional funding from the County of Monterey, would likely jeopardize the current SB 81 grant funding, and would likely result in significant delay and claims for damages.

Should the County choose to incorporate the Youth Center into the New Juvenile Hall, the County would be required to: 1) undertake the master planning of the two co-located facilities; 2) redesign the new Juvenile Hall campus; 3) protect and modify the in-place construction, and; 4) terminate the current Juvenile Hall construction contract for the convenience of the County.

A County funded co-location masterplan would be required to demonstrate how the two facilities and their respective administrations and populations could utilize the limited 9.2-acre site. The masterplan would also assess how to incorporate the programming space of the recently completed \$1,800,000 Salinas Valley Education Center which is located behind the current Youth Center. Due to the limited site, separate populations, and programming needs, the masterplan would require a complete re-design of



the current Juvenile Hall project design and layout. The required master planning and redesign could reasonably require 15 to 24 months and add millions of dollars to the overall project budget.

Construction has started at the new Juvenile Hall project with utility relocation, temporary fencing, grading and installation of foundation drilled caissons. Due to the likely redesign, the in-place construction would need to be protected, modified, or removed. Some of the work, such as the utility relocation work, will have a significant impact on the Jail Expansion project, as that facility is designed to share common utility corridors with the new Juvenile Hall. The in-ground construction is traditionally the most expensive part of new construction because the actual sub-surface conditions and utility locations cannot be known with complete accuracy until the work already takes place. In order to co-locate facilities, the County will have incurred significant costs in the new Juvenile Hall project only to abandon that work and incur additional costs to perform the same work pursuant to a new design.

Due to the time required to complete a new design, and the significant change in work, the County would need to terminate of the current New Juvenile Hall construction contract. While the contract allows the County to terminate without cause, it requires that the County pay for all work currently completed, certain materials ordered or delivered to the site and, the preservation of certain work. In addition to the hard costs incurred by the contractor, County could also face liability for claims from both the contractor and subcontractors for lost profits.

### **Conclusion**

At this late stage, we recommend the County not jeopardize the SB81 grant funding or incur the additional significant costs associated with redesigning the current new Juvenile Hall project, abandoning the in-place construction and possibly terminating the current construction contract. Once the construction project is closed out and if bed counts continues to decrease there may be opportunity to explore alternative uses for empty beds should the detention population remain low.

Another option for relocation of the County Youth Center may be at the 1935 Juvenile Hall, which is currently vacant and located at the corner of Natividad and Chaparral. This property may be suitable for adapted reuse as a new Youth Center. The original 3,885 square foot main building may be suitable for the administration building. Further, modifications to the 1935 Juvenile Hall building might require the demolition of the 2,575 square feet addition and development of new housing and program buildings. This potential location for the Youth Center is more convenient to the New Juvenile Hall to provide food service and laundry to the Youth Center. .



LINDA M. PENNER  
*Chair*

KATHLEEN T. HOWARD  
*Executive Director*

STATE OF CALIFORNIA

**BOARD OF STATE AND COMMUNITY CORRECTIONS**

2590 VENTURE OAKS WAY, SUITE 200 • SACRAMENTO CA 95833 • 916.445.5073 • BSCC.CA.GOV



EDMUND G. BROWN, JR.  
*Governor*

MONTEREY COUNTY PROBATION  
DEPARTMENT ADMINISTRATION

AUG 24 2018

RECEIVED

August 20, 2018

Monterey County Probation Department  
Marsha Parsons, Chief Probation Officer  
20 East Alisal Street  
Salinas, California 93901

Dear Chief Parsons:

This correspondence is in reference to your request for information and clarification regarding the option of housing the Monterey County Youth Center (MYC) program within the confines of the new Juvenile Hall (JH) once built. Our response is based on information known at this time and we also recommend that you contact your county counsel for legal opinion as needed.

Monterey County is in the process of building a 57 million-dollar, 120 bed replacement Juvenile Hall. Thirty-five million dollars has been allocated through state funding from SB 81, Round 1. The new juvenile hall project is all new construction with the exception of the dorm, which will be fully renovated and will be used as part of the project and rated bed space.

The following is intended to provide information to assist you in your decision-making process and provides guidance as appropriate.

1. The original Project Scope Summary describes the project as a juvenile facility and does not specifically note the specific facility operation. We have shared your request for information with our Construction Financing Division who have in turn had initial conversations with the Department of Corrections and Rehabilitation (CDCR) and the California Department of Finance (DOF) regarding the potential or option of housing the MYC Program within the Juvenile Hall and whether this potential operational change would constitute a formal scope change. CDCR requested a proposed project scope update, noting any potential change requested to the project. Upon their review, it was determined that there will be no requirement for a formal scope change request based on the documentation reviewed.
2. The Juvenile Hall currently houses pre and post disposition youth in detention. MYC currently houses youth committed by the Monterey Superior Court to a camp commitment. There are no Title 15 or Title 24 regulatory issues concerning the comingling of detention youth and committed youth in a juvenile facility and therefore, nothing that would preclude you from doing so. There are no sight and sound separation issues that will need to be addressed as all youth detained in the facility will be age appropriate, under the jurisdiction of the Juvenile Court and have an open, juvenile case.

We encourage you to review the potential operational impact of operating both facilities within the same building. There will be both positive and negative operational impacts of doing so. We suggest that you conduct a full analysis and ensure that you calculate for

additional staffing, other resources or unintended operational impact to the operations of both facilities so that your facilities remain in compliance with Title 15 and Title 24.

3. Your agency/county receives Juvenile Probation Camp Funding. County allocations are calculated based on the average daily population (ADP) of occupied beds in the "camp" as reported to the BSCC in the previous fiscal year. This means you will receive an allocation based on youth in the program.

Currently, your allocation for Monterey County is 1.8 %. The budget and the funding available statewide is set by State budget. If the state funding and your ADP remain constant, your funding should remain constant. If either state funding or your ADP should change, your allocation will change as well.

4. The California Welfare and Institutions Code (WIC 18221) is very specific to the services that are authorized relative to the Monterey Youth Center, and it will be important for your facility staff to ensure that these services are documented. As you intend to provide a separate space/unit for your camp youth, it is anticipated that this will not be an issue; however, in the event that the camp capacity will increase, this will be an issue that will need to be addressed.
5. Both the MYC and the JH will be viewed as separate facilities for inspection purposes and will have their own identifying state number even though they will be located in the same building. It will be advantageous for you to ensure that your paperwork is kept separately for inspection purposes. Title 15 and Title 24 will still apply to both facilities as it does currently and staffing ratios for both facilities will be required to be maintained at 1 staff to 10 youth during waking hours and 1 staff to 30 youth during sleeping hours as the physical plant will be that of secure detention. This will be an increase in staffing requirements for the MYC.

We appreciate the opportunity to be of assistance and if you have any further questions, please do not hesitate to contact me at [lisa.southwell@bscc.ca.gov](mailto:lisa.southwell@bscc.ca.gov) or by phone at (916) 322-1638.

Sincerely,



Lisa Southwell,  
BSCC Field Representative