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THE COUNCIL  
OF  
THE CITY OF NEW YORK  
**DANIEL DROMM**  
COUNCIL MEMBER, 25<sup>TH</sup> DISTRICT, QUEENS

CHAIR  
FINANCE  
COMMITTEES  
AGING  
CIVIL RIGHTS  
CIVIL SERVICE & LABOR  
EDUCATION  
IMMIGRATION

July 10, 2018

Martha King, Executive Director  
Chair and Members  
New York City Board of Correction  
1 Centre Street, Room 2213  
New York, NY 10007

Re: Department of Correction (DOC) Limited Variance Renewal Request: BOC  
Minimum Standard § 1-17(d)(2) (Limitations on the use of punitive segregation)  
(Seven-Day Waiver)

DOC Limited Variance Renewal Request: BOC Minimum Standard § 1-02(c)(1)  
(Classification) (Young Adults Housed Separately and Apart)

DOC Variance Requests re Raise the Age Specialized Secure Detention Facilities and  
Specialized Juvenile Detention Facilities

Dear Ms. King, Acting Chair Cephas, and Members:

While the plan to move detainees off of Rikers Island moves forward, the Department of Correction (DOC) requests variances that evince a lack preparation for this impending closure. Instead of channeling its efforts to de-escalating violence in our jails, the DOC is requesting variances that would not only subvert the Board's efforts around punitive segregation but also allow for age-inappropriate housing of younger offenders.

I reiterate my past concerns around the use of punitive segregation and renew my call for the Board to deny this variance request. I also encourage the Board to deny the DOC's request to comingle young adults (19-21 years old) with adults (22 years old and older) unless the DOC can show how this furthers rehabilitative and reintegrative goals. As a 25-year veteran teacher, my own knowledge about the psychology of young people is that while their brains are still developing, it is important to have them in age-appropriate settings. The comingling of 19-to-21-year-olds with those 22 and older seems antithetical to that approach. I ask that the Board defer to the experts on this issue and deny the request if the DOC cannot provide adequate evidence.

Lastly, I have serious concerns about the roll out of Raise the Age and the DOC's involvement with any facility that holds individuals under 18, and I ask that the Board proceed very cautiously. I will continue to gather information to ascertain the situation and encourage the Board to do the same. If the Board does not have adequate information at this time, the relevant variance requests should be denied.

Four years ago, the DOC made a commitment to reform but has sadly backtracked on many of its promises. While the City Council, the Board, and advocates work toward implementing the changes so desperately needed in our jails, the same cannot be said of the DOC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Dromm'. The signature is stylized with a long horizontal stroke extending to the right.

Daniel Dromm  
Chair, Committee on Finance