

ULSTER COUNTY LEGISLATURE

KENNETH J. RONK, JR. Chairman
JAMES F. MALONEY, Vice Chairman
MARY BETH MAIO, Majority Leader
HECTOR S. RODRIGUEZ, Minority Leader
VICTORIA A. FABELLA, Clerk



P.O. Box 1800
KINGSTON, NEW YORK 12402
Telephone: 845 340-3900
FAX: 845 340-3651

MINUTES

MAY 24, 2018

SPECIAL SESSION MEETING

5:30 PM

MEETING CALLED TO ORDER BY CHAIRMAN: 5:41 PM

PLEDGE OF ALLEGIANCE TO THE FLAG AND MOMENT OF SILENT MEDITATION:
Led by Chairman Kenneth Ronk, Jr.

ANNOUNCEMENTS

FIRE EVACUATION PLAN

PLEASE NOTE THAT IN THE EVENT OF AN EMERGENCY THE FIRE DEPARTMENT HAS REQUESTED THAT LEGISLATORS AND ALL OTHERS MOVE AT LEAST ONE BLOCK AWAY FROM THE COUNTY OFFICE BUILDING IN ORDER NOT TO IMPEDE THE FIREFIGHTERS IN THEIR DUTIES

CELL PHONES

Please silence cell phones for the duration of the Special Session.

MICROPHONES

Please be reminded to use your microphones when speaking so that you are recorded for the official record.

MINUTES

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MAY 24, 2018

ROLL CALL:

Present: 18

Absent: 5 (Legislators Donaldson, Eckert,
Greene, Maio, Wawro)

COMMITTEE OF THE WHOLE:

Chairman Kenneth Ronk recognized Majority Whip Lopez for the purposes of a motion, seconded by Minority Leader Rodriguez to enter Committee of the Whole. Motion passed unanimously. Chairman Ronk called upon Legislator Richard Gerentine to assume the role of Chairman of the Committee of the Whole.

County Executive Kenneth Crannell, Director of Probation Nancy Schmidt, Rashida Tyler from the County Attorney's Office, Director of Purchasing Marc Rider, Deputy Budget Director Jamie Capuano, and DPW Commissioner Tom Jackson presented information and answered questions pertaining to work the Ulster County Restorative Justice and Community Empowerment Center. (See attached handout)

MOTION NO. 1 Moved to Consider Resolution Nos. 199, 201, 202, 203 as a Block

Motion Made By: Legislator Litts

Motion Seconded By: Legislator Rodriguez

Resolution No. 199: Amending Capital Project No. 512, Probation Building Construction – To Accommodate The Ulster County Restorative Justice And Community Empowerment Center – Amending The 2018-2023 Ulster County Capital Improvement Program - Amending The 2018 Capital Fund Budget – Public Works (Building And Grounds)

Resolution No. 201: Approving The Execution Of A Contract In Excess Of \$50,000.00 Entered Into By The County – Ferrari & Sons, Inc. – Department Of Public Works

Resolution No. 202: Approving The Execution Of A Contract In Excess Of \$50,000.00 Entered Into By The County – J & J Sass Electric, Inc. – Department Of Public Works

Resolution No. 203: Approving The Execution Of A Contract In Excess Of \$50,000.00 Entered Into By The County – Vamco Sheet Metal, Inc. – Department Of Public Works

Discussion: None

Roll Call Vote: No

Voting In Favor: 18

Voting Against: 0

Disposition: Motion Carried

MOTION NO. 2 Moved to Adopt Blocked Resolution Nos. 199, 201, 202, 203

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Motion Made By: Legislator Litts
Motion Seconded By: Legislator Rodriguez

Discussion: None
Roll Call Vote: No
Voting In Favor: 18
Voting Against: 0
Disposition: Resolutions Adopted

Adjournment of the Committee Of The Whole

Motion Made By: Legislator Rodriguez
Motion Seconded By: Legislator Litts
No. of Votes in Favor: 18
No. of Votes Against: 0

PUBLIC COMMENT:

There were (8) speakers signed up for public comment.

1. Michael Berg: Mr. Berg Director of Family of Woodstock spoke in favor of the 180 Program and UC Restorative Justice Program and Center.
2. Nardia Bennett: Ms. Bennett spoke in support of the Restorative Justice Program and Center and asked the Legislature to make the right decision.
3. Albert Cook II: Mr. Cook, a history teacher in New Paltz, spoke about how mental illness was addressed in the early 1800's - equating it to today's justice system solution of incarceration. Mr. Cook supports the Restorative Justice Program and Center.
4. Melinie Forstrom: Ms. Forstrom, a volunteer with the Family of Woodstock 180 Program, spoke about human adolescent brain development and the power of restorative justice.
5. Rev. Patrina Torres: Ms. Torres shared how the justice system negatively impacted her life and the lives of her family, and applauds Ulster County's support of the Restorative Justice Program helping youth become productive members of society.
6. Rev. Reyes Torres: Mr. Torres spoke of his work as a Chaplin in the New York State prison system and his support the UC Restorative Justice Program.

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7. Marco Ochoa: Mr. Ochoa representing the Hispanic community spoke in support of the UC Restorative Justice Program.
8. Robin Andrade: Ms. Andrade a local architect expressed young people already in the system need mentors and a support system.

Please Note: Complete content of the public comment period can be heard on the Ulster County Legislative Website.

Chairman Ronk asked for a motion to block vote Resolution Nos. 199, 201, 202 and 203. Legislator Rodriguez motioned, seconded by Legislator Litts to Block Vote Resolution Nos. 199, 201, 202 and 203. All were in favor. Carried

RESOLUTION NOS: 199 - 203

Resolutions

- 199 Amending Capital Project No. 512, Probation Building Construction – To Accommodate The Ulster County Restorative Justice And Community Empowerment Center – Amending The 2018-2023 Ulster County Capital Improvement Program - Amending The 2018 Capital Fund Budget – Public Works (Building And Grounds)**

ADOPTED BY THE FOLLOWING VOTE:

AYES: 18 NOES: 0
(Absent: Legislators Donaldson, Eckert, Greene, Maio, Wawro)

- 200 Authorizing Probation Building Reconstruction To Accommodate The
BOND Ulster County Restorative Justice And Community Empowerment Center, In And For The County Of Ulster, New York, At A Maximum Estimated Cost Of \$2,842,200.00, And Authorizing The Issuance Of \$2,842,200.00 Bonds Of Said County To Pay The Cost Thereof**

ADOPTED BY THE FOLLOWING LONG ROLL CALL VOTE:

AYES: 18 NOES: 0
(Absent: Legislators Donaldson, Eckert, Greene, Maio, Wawro)

- 201 Approving The Execution Of A Contract In Excess Of \$50,000.00 Entered Into By The County – Ferrari & Sons, Inc. – Department Of Public Works**

ADOPTED BY THE FOLLOWING VOTE:

AYES: 18 NOES: 0
(Absent: Legislators Donaldson, Eckert, Greene,
Maio, and Wawro)

- 202 Approving The Execution Of A Contract In Excess Of \$50,000.00
Entered Into By The County – J & J Sass Electric, Inc. – Department Of
Public Works**

ADOPTED BY THE FOLLOWING VOTE:

AYES: 18 NOES: 0
(Absent: Legislators Donaldson, Eckert, Greene,
Maio, and Wawro)

- 203 Approving The Execution Of A Contract In Excess Of \$50,000.00
Entered Into By The County – Vamco Sheet Metal, Inc. – Department Of
Public Works**

ADOPTED BY THE FOLLOWING VOTE:

AYES: 18 NOES: 0
(Absent: Legislators Donaldson, Eckert, Greene,
Maio, and Wawro)

Motion by Legislator Litts, seconded by Legislator Rodriguez, to adjourn the meeting. All in favor.

MEETING ADJOURNED: 7:17 PM

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NEXT MEETING:

A public hearing on the Tentative Budget of the Ulster County Community College for the year 2018 - 2019 will be held on **Tuesday, June 12, 2018 at 6:30 PM** in the College Lounge, Vanderlyn Hall, **Ulster County Community College, Stone Ridge, New York.**

The next Regular Meeting of the Ulster County Legislature will be held on **June 19, 2018 at 7:00 PM** in the Legislative Chambers.

Resolution deadline is this **Wednesday, May 30, 2018 at 12 Noon.**

Ulster County Restorative Justice and Community Empowerment Center



MICHAEL P. HEIN
COUNTY EXECUTIVE

May 24, 2018

STATE OF NEW YORK
UNIFIED COURT SYSTEM
THIRD JUDICIAL DISTRICT
2500 POND VIEW, SUITE 210
CASTLETON-ON-HUDSON, NY 12033
(518) 285-8300
FAX (518) 285-6169

LAWRENCE K. MARKS
Chief Administrative Judge

MICHAEL V. COCCOMA
Deputy Chief Administrative Judge
Courts Outside New York City

THOMAS A. BRESLIN
District Administrative Judge
Third Judicial District

BETH A. DIEBEL, ESQ.
District Executive

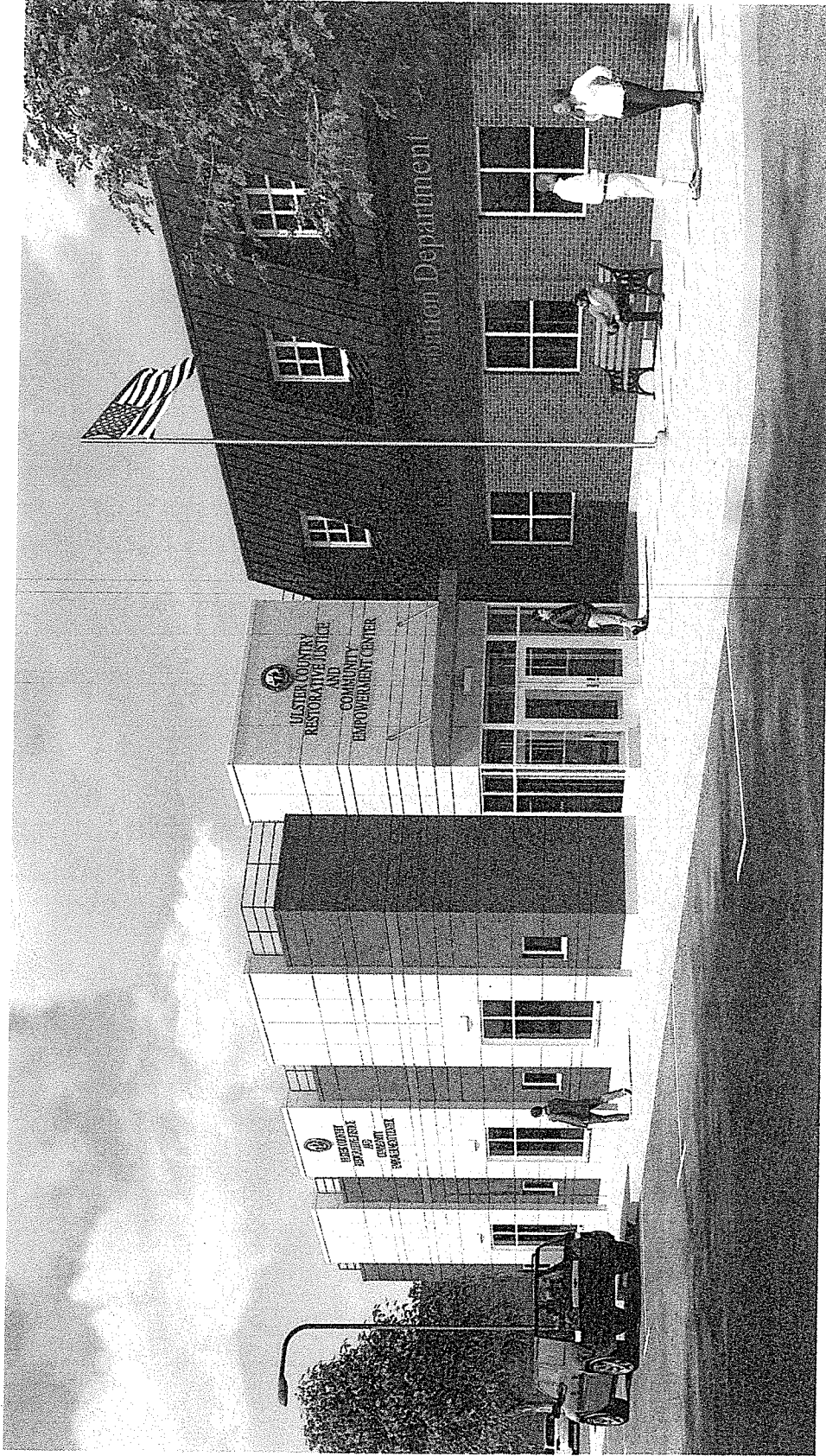
CHRISTY Q. BASS
Deputy District Executive

MEMORANDUM

TO: Mike Hein, Ulster County Executive
FROM: Thomas A. Breslin, Administrative Judge
DATE: May 17, 2018
RE: Ulster County Executive's Proposal for the Ulster County Restorative Justice and Community Empowerment Center

Thank you for the opportunity to review your exciting new proposal. The Ulster County Restorative Justice and Community Empowerment Center has the potential to become a special new model within the State of New York as we work to implement Raise the Age legislation. The Center is designed to greatly assist in the critical area of juvenile justice reform and provide a unique opportunity to change the lives of the county's at-risk youth. The Center, along with the new Ulster County Family Court building, will provide the necessary space to deliver essential services to local youth with all the dignity and respect they so justly deserve.

Again, thank you for sharing this proposal with me. I truly believe that your proposed Center will be the standard by which other programs will be judged as we implement Raise the Age and develop programming for it.



BROADWAY RENDERING

ULSTER COUNTY RESTORATIVE JUSTICE CENTER
LOTHROP ASSOCIATES LLP



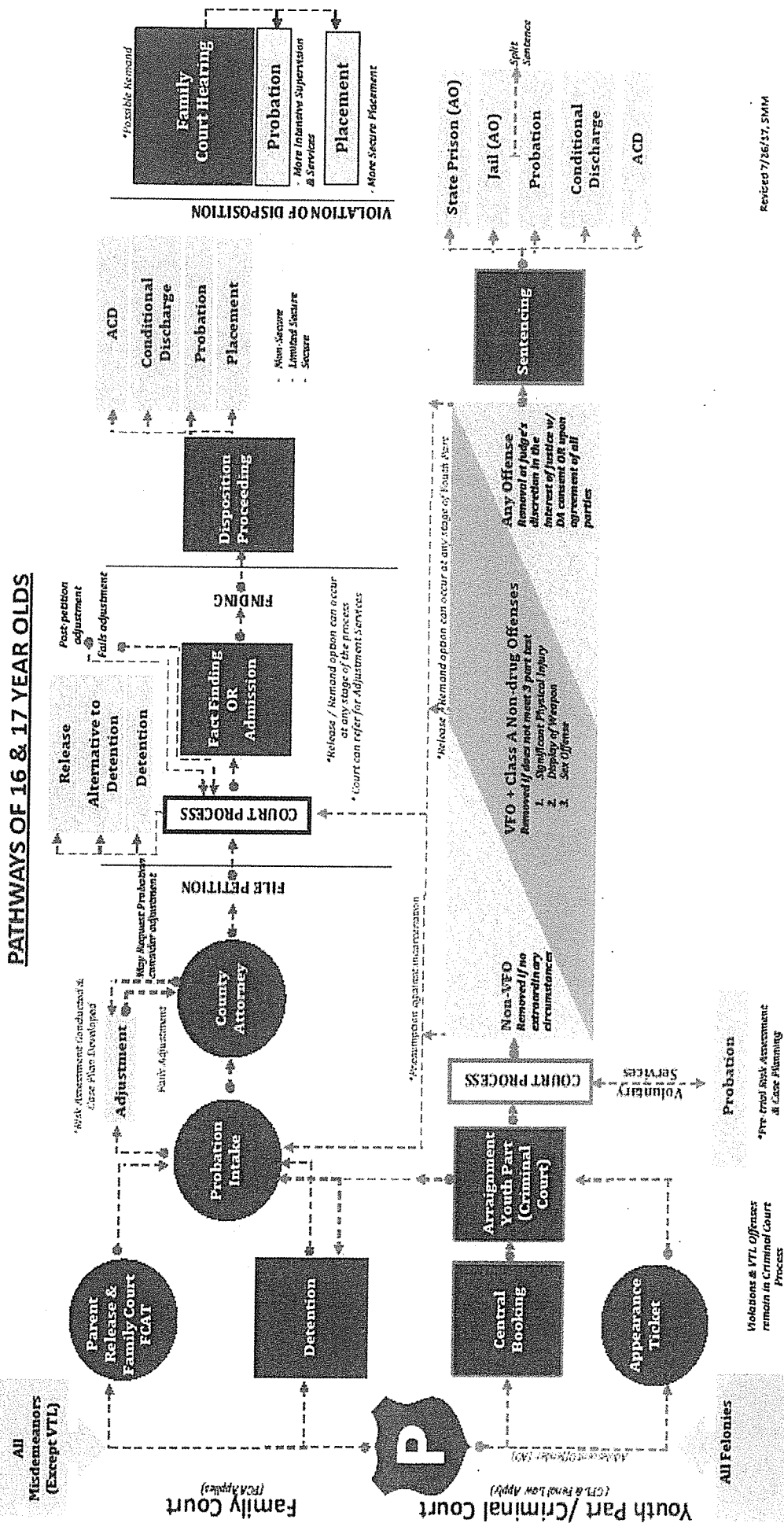
Michael P. Hein
Ulster County Executive

SPECIAL SESSION OF ULSTER COUNTY LEGISLATURE MAY 24, 2018

Ulster County Probation Department
Nancy Schmidt, Probation Director

Restorative Justice and Community
Empowerment Center

PATHWAYS OF 16 & 17 YEAR OLDS



Revised 7/26/97. SMM

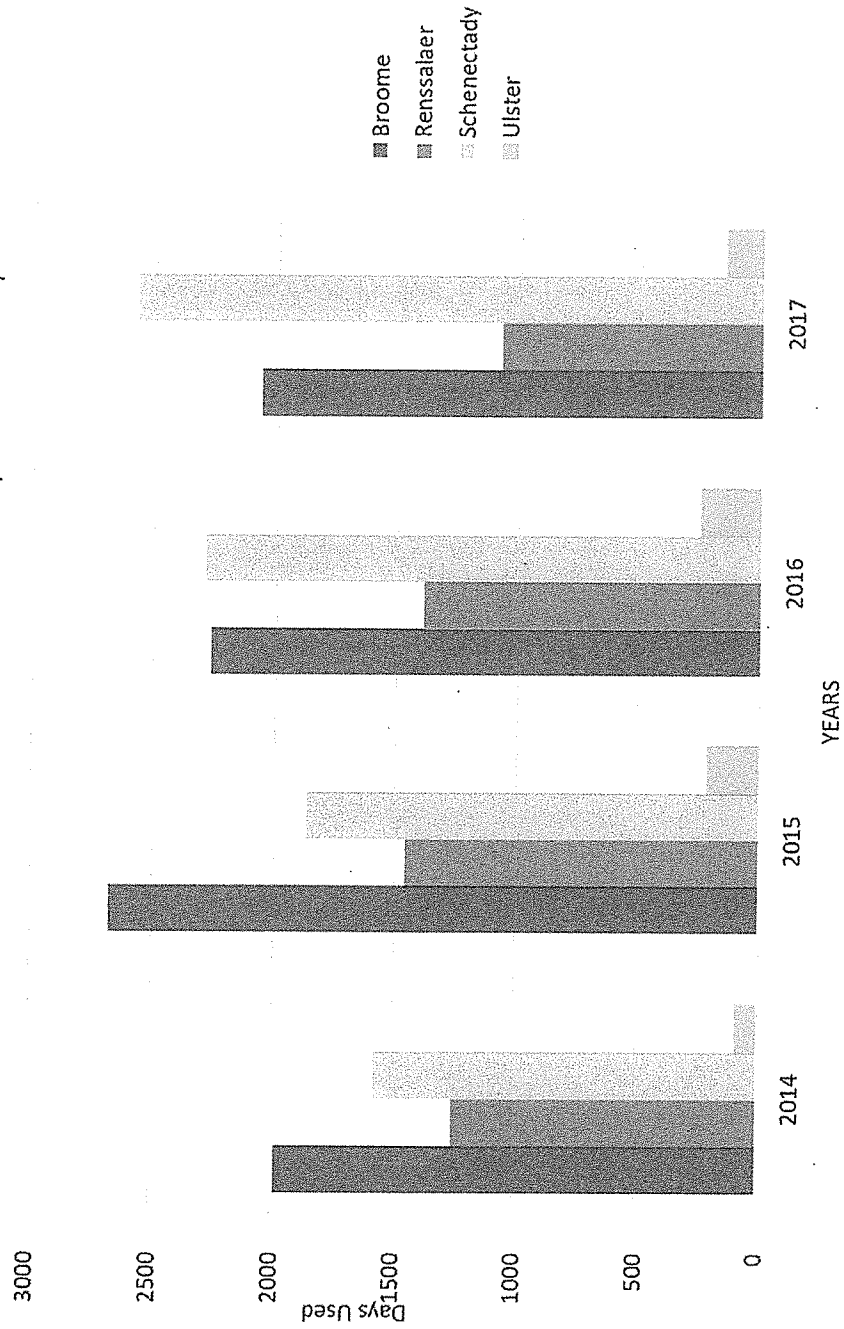
Juvenile Delinquency Intakes prior to Raise the Age

Under 16 intakes	2015	2016	2017
JD intakes	108	51	108
JD petitions	72	40	74
JD Probation supervision cases	83	55	65

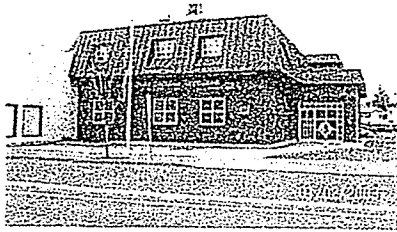
Arrests and dispositions of 16-17 year old youth in Ulster County

	2015	2016 (mis/fel)	2017 (mis/fel/VTL)
16 years old	92	80 (62/18)	83 (69/13/1)
17 years old	123	92 (74/18)	114 (88/24/2)
Total	215	172 (136/36)	197 (157/37/3)
Convictions			
Combined 16-17	96	103 (72/31)	110 (73/37)
Sentences			
Jail/Prison	18	22* (9/13) *not including 3 split sentences	19* (11/8) not including 5 split sentences
Probation	18	17 (5/12)	26 (12/14)

New York Medium-Sized Counties-Detention Days Used Annually



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**Department of Public Works -
Buildings and Grounds**
Probation Building Construction

Project Name: Probation Building Construction
 Project Type: Facilities
 Project Purpose: Bldg. Dept./Consolidation
 New (Y/N): N
 Routine (Y/N): N
 Estimated Start Date: 09/17
 Estimated Completion Date: 06/19
 Estimated Total Cost: \$1,250,000

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Project Description

Renovate front, former Rent-A-Center area for office use. Vacant area presently used for storage. Approximately 4,500 square feet of office space available. Pending Building Utilization Review. Probation employees from CCP relocation to office space.

Project Detail and Status

The purpose of this proposed capital project is to relocate Probation Department employees currently working at CCP to the available space to consolidate the Probation Department to one location. This allows the County to further vacate the former jail site for the possibility of sale in the future. The obvious reason to relocate to County owned property is to avoid locating, fit up costs, leasing and maintenance of space in case the jail site is sold. Due to the size and scope of the project the County does not have the manpower to dedicate to the project, therefore it would be a typical Public Works bid/contract.

Phase Description	Start Date	Completion Date	Cost
Design	9/2017	3/2018	\$ 125,000
Construction	4/2018	9/2019	\$ 1,125,000
Acquisition			
Total Cost			\$ 1,250,000
Summary			
Prior Years			
2016			\$ 100,000
2017			\$ 1,050,000
2018			\$ 100,000
2019			
2020			
2021			
After 2021			
Total Cost (must be the same as total of phases above)			\$ 1,250,000

Costs	
Capital Fund	\$ 1,250,000
Operating Budget	
Other	
Total	\$ 1,250,000

Funding	
Federal	
State	
Operating Budget	
Other	
Serial Bonds Authorized	
Total Funded	-
Unfunded County Share	1,250,000
Total	\$ 1,250,000

Lothrop Associates LLP 333 Westchester Avenue, White Plains New York 10604

Tabulation of Bids

Project	Renovations for Restorative Justice and Community Empowerment Center Contract #2 – Mechanical Construction
Location	733 Broadway, Kingston New York
Project Number	Ulster County Bid Number: RFB-UC18-143C / LA Project Number: 2038-00
Owner	County of Ulster
Architect	Lothrop Associates LLP
Engineer	SJM Associates (MEP & FP) and Clapper Structural Engineering, PLLC (Structural)
Date of Bid Opening	Thursday, March 22, 2018
Time of Bid Opening	2:00 PM

[illegible]

DATE OF BID OPENING: THURSDAY, MAY 3, 2018 TIME 2:00 PM
 BID NAME & NUMBER: RFB-UC18-150C, RESTORATIVE JUSTICE CENTER
 REQUISITIONING DEPARTMENT: DPW

ULSTER COUNTY PURCHASING DEPARTMENT

XX

Bids Received

SIGNATURE OF REPRESENTATIVE

NAME OF COMPANY

General Contract

BB Add Base Alt1 Alt2 Alt3

Key Construction ✓✓ 1,846,000 deduct Add Add
 63,000 3100 36K 18

Alt5 Product
 18K

Base Alt1 Alt2 Alt3

Ferrary and Sons ✓✓ 1,746,000 Product Product Add
 29,000 2,800 38,000

Alt5
 Deduct 14,000

DATE OF BID OPENING: THURSDAY, MAY 3, 2018 TIME 2:00 PM
BID NAME & NUMBER: RFB-UC18-150C, RESTORATIVE JUSTICE CENTER
REQUISITIONING DEPARTMENT: DPW

ULSTER COUNTY PURCHASING DEPARTMENT

XX

SIGNATURE OF REPRESENTATIVE Bids Received NAME OF COMPANY
Electrical Contractor

	<u>Add</u>	<u>BB</u>	<u>Base</u>
<u>Kassel Men</u>	<u>✓</u>	<u>✓</u>	<u>374,300</u>
<u>J+J SASS</u>	<u>✓</u>	<u>✓</u>	<u>330,000</u>

DATE OF BID OPENING: THURSDAY, MAY 3, 2018 TIME 2:00 PM

BID NAME & NUMBER: RFB-UC18-150C, RESTORATIVE JUSTICE CENTER

REQUISITIONING DEPARTMENT: DPW

ULSTER COUNTY PURCHASING DEPARTMENT

XX

SIGNATURE OF REPRESENTATIVE: Bids Received NAME OF COMPANY

HVAC BB Ad Base

Airflow ✓ ✓ 454,010

CB Strain ✓ ✓ 498,400

Vanco ✓ ✓ 401,000

TIME 2:00 PM

RFB-UC18-150C, RESTORATIVE JUSTICE CENTER

ULSTER COUNTY PURCHASING DEPARTMENT

XX

Bids Received

NAME OF COMPANY

Plumbing

Restorative Justice & Empowerment Center

1. What specific programs are being implemented and housed by the Restorative Justice and Empowerment Center?
 - Yet to be determined. Likely to include restorative justice circles, job training and community based programming, etc. Under Raise the Age, the County is required to provide mental health screening, social services, diversion programming, risk assessment, supervision, case planning and other services to youth. Additionally, under County Executive Hein's vision the County will work to provide additional evidence based services built around Restorative Justice processes to change the trajectory of a youth's life to have a long-term, lasting impact on the community.
 - How many of these programs are currently being performed by Ulster County?
 - Some of the services currently under consideration are offered through our Coordinated Children's Service program and our Probation Department, however, the additional requirements under Raise the Age, coupled with the additional volume of cases being handled by these departments cannot be addressed through existing avenues. Example – Currently only 10% of the 16 and 17- year-olds criminal matters come to Probation. Under Raise the Age, Probation will have some role with all of these youth.
 - Some of the existing programs identified by the County so far include: Multi-Systemic Therapies, additional services through the One80 program, and additional restorative justice programming that has shown great promise.
 - What programs are new?
 - County Executive Hein has formed a taskforce of community members to assist to assess community needs and identify new and existing county and community -based programs that can be offered at the center. We look forward to discussing policy and programs for 2019 with appropriate legislative committees in the July- August time frame.
 - What programs cannot be implemented without the use of the Center.



- The required services will be provided, but additional staff will not have designated work space and service provision will be inefficient and no new programming will be implemented.
2. The Resolution states that the increase in funding is due in part to the “revised design components incorporated based on best practice models”.
- What are the “best practice models” being implemented?
 - Originally planned for simple cubicle space back in 2016 (see 2015 Capital Improvement Program), prior to Raise the Age to accommodate existing Probation Officers. The new design includes space for additional staff and best practice elements to encourage group restorative justice circles with breakaway rooms to allow for private conferencing rooms for youth and victims.
 - Best practices require that probation separates youth from adults – necessitating a separate waiting room space for youth and separate bathroom facilities, while preserving security for staff and others in the building.
 - The space also includes best practices aimed at creating a space that youth feel comfortable in without the look and feel of a law enforcement space. These elements include softer lighting and furnishings, use of natural lighting, etc.
 - How were “best practice models” decided on?
 - The best practice models for the space were developed in conjunction with the architect - Lothrop Associates LLP, experts in the community and research on the successful implementation of Restorative Justice space. Among other things, these models incorporate the use of natural light, providing private rooms for conferencing with youth, families and potentially victims.
 - How did the “best practice models” change the scope of the project? Specifically, what additions are being implemented due to the exercise of “best practice models”?



- Instead of simply creating cubicle space as originally outlined in the 2016 Capital Improvement Plan, the project involves the creation of two separate breakaway rooms divided by removable walls. These rooms can be used individually for smaller groups or can be used as a large open room for larger group workshops. This allows youth to work together in smaller groups or together for larger group conversations. This space also provides a separate entrance for youth, along with other separate facilities as required by the law.
 - The space is needed to accommodate small private rooms with doors so that youth can talk privately with their probation officer, lawyer, parents, and potentially the victim. These private rooms will also be used for the required mental health screenings outlined under Raise the Age.
3. There are minimum requirements for Raise the Age which are dictated by the State. The Legislature understands that the proposed facility exceeds those minimum requirements.
- How are the State's minimum requirements being expanding upon?
 - The State requires that youth receive additional probation services such as voluntary assessment and case planning, program referral, adjustment services, mental health screenings, social services under Raise the Age. The law also has a presumption against detention through the use of alternatives to detention and enhanced programming to address the underlying criminal behaviors. There are specific requirements regarding the physical space and the separation between youth and adults. The space will be used to provide these services.
 - The law does not dictate what programs are to be provided as diversion programming, the County is working with the Probation Department, Social Services and the Community to determine these types of programs.
 - Can the minimum requirements be met in time for the October 1, 2018 deadline without the use of the Center?
 - The required services will be provided, but additional staff will not have designated work space and service provision will not be streamlined. For example, additional staff will be forced to be located outside of Probation, we will have to hire additional staff for administrative functions such as clerical and support staff. We anticipate a higher placement rate for the



16- year-olds at secure and non-secure detention facilities if the Center is not open in a timely manner. Absent one centralized facility, the youth are more likely to have to attend multiple meetings at different locations, thereby reducing the effectiveness of the programs. Probation has found that this may result in the youths declining services.

- We anticipate that immediately after implementation on October 1, 2018 volume will be low. However, the volume will increase to exceed critical mass by January 2019 of clients and volume will continue to increase through 2019 and even more in 2020.
- Can the minimum requirements be met in time for the October 1, 2018 deadline without complete and total use of the center? (Is project phasing possible?)
 - Again, the services will be offered, however, they will not be as efficiently delivered and the County anticipates a higher placement rate for youth absent the expansion of services that will be provided through the Center. Phasing of the project will increase the cost.
- What are the minimum standards that are currently not being met by the County?
 - At this time, there are no minimum Raise the Age requirements for this age group. These requirements do not begin under Raise the Age until October 1, 2018.
- What additional minimum standards can be met by October 1st so that there is no rush for a construction deadline? What minimum standards are considered not possible without the use of the Center?
 - We need space for staff and programming in order to meet the minimum requirements under Raise the Age.
- What other options are there beyond building a center that will allow the County to fulfill the minimum requirements by the required deadline?
 - The project involves the renovation of existing County owned space, not building a new facility. The only other option would be to rent space to accommodate the additional staff and programmatic needs outlined under Raise the Age.
- Who was involved in the “value engineering process”?



- The architect, construction manager, Ulster County Project Manager Frank Rahm, Public Works Deputy Commissioner Brian Cunningham, Director of Purchasing Marc Rider, Commissioner of Public Works Tom Jackson and Director of Research and Operation Programs Rashida Tyler.
- What actions and changes were specifically made during the “value engineering process”?
 - Reduce meeting rooms and divide into two rooms instead of 3, which also omits one folding partition
 - Omit 72 lineal feet of exterior side parapet and replace with mechanical guard railing
 - Omit 72 lineal feet of exterior cladding on side elevation and replace with EIFS
 - Reduce floor boxes in multi-function room
 - Omit abuse resistant wall covering and replace with paint in multi-function room
 - Expand construction schedule
- How has “value engineering” affected the scope of the project?
 - Through value engineering the project became less expensive, while not giving up any of the function of the building.
- Provide the number of children in this age group that would have been serviced had the Raise the Age law been in place for each of the past three years.
 - Please see the chart in your packet labeled Arrests and Dispositions of 16-17-year-old youth.
- What percentage of individuals in the 16, 17 and 18-year-old category will be diverted to the Restorative Justice program and will this impact existing case load enough that office space will already be available? i.e. A separate entry door is needed so 17-18 are not exposed to older individuals but existing office space will be used after re-training caseworkers. (Or will additional staff needed ?)
 - Raise the Age impacts 16 & 17-year-old youth (not 18). Probation will have a role with all of the youth processed through Family Court and Youth Part. The Probation Department averaged approximately twenty 16 & 17-year-old youth on probation through the criminal courts per year. Under Raise the Age, approx. 200 youth per year will come to probation for probation services that were previously not offered but are now required.



- What funding is expected from the State, if any. Please provide documentation or links if available.
 - Section 104 of the Raise the Age Legislation (Chapter 59 of the Laws of 2017) states that counties will not be required to contribute a local share of costs related to the provisions of Raise the Age.
 - The State has reiterated this commitment in the following areas:
 - <https://www.ny.gov/raise-age/frequently-asked-questions>
 - <https://www.ny.gov/raise-age/raise-age-implementation#resources>
- What are/is the written program for the Restorative Justice Center (Ulster County's vision not state requirements)
 - The Restorative Justice and Community Empowerment Center as envisioned by County Executive Hein builds on the concept that an entire community actively contributes to raising its youth and will provide programs and services to help prevent youth involvement in crime and divert those who have already committed offenses away from juvenile detention facilities. The RJCEC is a facility that will host restorative justice and other community-based, multi-service, youth diversion programs. It provides Ulster County an opportunity to help get youth back on the right track.
- The County's current Restorative Justice programming offered through Family of Woodstock's One80 program is contracted through December 31, 2018. Why can't newly qualified individuals utilize this program beginning October 1st through the completion of the center?
 - We may utilize this program to serve these new cases. However, One80 is operating at capacity. It does not currently have space to accommodate these cases under the current funding. Also, using the services of One80 does not eliminate the requirements for probation intake and other tasks under the law. The law expanded tasks that are required to be completed by Probation Officers for 16 & 17-year-old JDs as well as under 16-year-old JDs.
- What green initiatives will be incorporated into the construction process?
 - a. LED light fixtures
 - c. Additional roof insulation



- d. Additional wall insulation
- e. Low water usage fixtures and devices
- f. Entry air lock vestibule
- g. Low air infiltration doors and windows
- If there is any premium time included within the construction proposal/quotation to meet the ambitious deadline?
 - We do not think the schedule has a significant impact on the cost of this project. We do know that the original 180 day schedule in the first bid, was a reason for the bids coming in higher than expected. We believe 210 days is reasonable.

