



**JUSTIN A. GIBBS**  
Sheriff/Coroner  
Director O.E.S.

## **GLENN COUNTY SHERIFF'S OFFICE**

Sheriff, Coroner, Civil Process, Office of Emergency Services, Animal Control  
*"Commitment to Service Dedication to Community"*

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**TRAVIS GOODWIN**  
Undersheriff  
Deputy Director O.E.S.

**AMY TRAVIS**  
Deputy Director O.E.S.

September 1, 2023

City Manager Marti Brown  
City of Willows  
201 N Lassen Street  
Willows, CA 95988

Re: Law Enforcement Services

Ms. Brown:

The Glenn County Sheriff's Office received a request from the City of Willows Ad Hoc Committee to put into narrative form the differences between the original contract level of law enforcement services and what we are proposing moving forward.

The short answer is none.

When we originally did a review of the original contract, we quickly realized it did not cover the cost of the services we were providing to the City of Willows.

While we believe the original contract was negotiated in good faith, we believe there were significant unforeseen costs that were not considered. This caused the Sheriff's Office to inadvertently operate in a deficit, which was only compounded by rising costs and unprecedented inflation. After speaking with our County Counsel, we were informed that although it would be a violation of the law for us to make a profit off the services provided to the City, it is also against the law for us to offer services at a reduced cost. The contract would have to reflect the actual cost accrued by the Sheriff's Office, for services rendered per Government Code Section 51350. From a business standpoint this means the Sheriff's Office, upon entering into a contract with a City, would have to provide services at its cost, not making any profit or providing any advantage to the Sheriff's Office, while taking on all the liability, stress, and unfunded liabilities that come with running an additional Law Enforcement agency, in which the Sheriff's Office would otherwise not be responsible.

During contract negotiations, the Sheriff gave direction as to what he believed our minimum staffing level would have to be in order to provide safe and adequate law enforcement services to the City of Willows. Cost factor or single individual positions, are calculated using the weighted salary of the currently appointed employee for that classification. For positions with multiple allocations, such as Deputy Sheriff, costs are determined by adding the weighted salaries of all of our personnel within those classifications and then divide the total by the number of funded allocations. This provides an average cost of that position.

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Determination of the calculated staffing level included review of local, state, and federal statistical resources. The Sheriff's Office reviewed our record management system (RMS) statistics for the City of Willows jurisdiction, from the start of the contract until the end of 2022. This is an advantage we had over the original creators of the initial contract. In doing this, we found that the City of Willows accounted for approximately 47% of our caseload. We know the actual number is slightly higher as we are still in the process of assigning jurisdictional coding to our addressing database, and the percentage will increase as each address is assigned to the appropriate jurisdiction. Addresses without a specific city jurisdiction automatically default to the Glenn County Sheriff's Office as the dispatching agency, resulting in a reduced city-specific percentage. Additionally, the Sheriff's Office serves a dual role for coroner's cases within the City of Willows. Generally, the Sheriff's Office does pull a case for each reported death within the county, regardless of jurisdiction as it requires a Coroner's investigation. For example, cases in the Sheriff's Office RMS which show a City of Orland jurisdiction are generally coroner's investigations only and are not a contracted law enforcement services. However, all cases within the City of Willows jurisdiction, including coroner's cases are considered contracted law enforcement services as the Sheriff's Office is both Coroner and Investigating Agency. When there is a death in the City of Orland, the Orland Police Department responds to investigate the death from a criminal aspect. The Glenn County Sheriff's Office also responds to investigate and determine the Cause and Manner of Death. When a death occurs in the City of Willows, we respond and fill both roles. When we ran our statistics, we found that the City of Willows accounted for 47% of our caseload and the City of Orland accounted for 3% of our caseload, which we found to all be Coroner's cases (Orland).

Following the review of our internal statistics, we searched for any recommendations of how many peace officers are recommended per capita. We contacted California Commission on Peace Officer Standards and Training (POST). They informed us they did not have any such studies or recommendations and referred us to the Federal Bureau of Investigation (FBI). In doing so, we found an FBI study/recommendation from 2019 (attached) showed that for our area, Western Pacific Region, there were 4.3 peace officers per 1000 population. In 2021, the population of the City of Willows was listed at 6244. Based on the FBI recommendation 26 peace officers would be needed to staff a jurisdiction of Willows' size. The Sheriff's Office felt this was higher than the number needed to provide adequate law enforcement services to the City of Willows. In the same study, we found that the average number of peace officers per capita in the United States was 2.3 per 1000 population. This calculation gave us a recommendation of 14.36 peace officers for the 6244 population of the City of Willows. We felt this was a more reasonable number. It should be noted this study did not have any recommendations on office staff, non-sworn staff, etc., only on sworn personnel.

In our talks with the Ad Hoc Committee, the City of Willows wished to know what the minimum number would be to provide adequate law enforcement services to the City. Based off the criteria and statistics listed above, as well as practical knowledge gained in the prior six years of providing law enforcement services to the City of Willows, we determined the minimum number of peace officers needed to provide these services was twelve (12). These twelve peace officers consisted of a Lieutenant to handle the administrative needs of a contract City, a Sergeant to provide field level supervision, and nine line level peace officers. It should be noted that the services of the Lieutenant, Sergeant, and Detective is not fulfilled by one person but rather split up between three Lieutenants, six Sergeants, and four Detectives.

We were asked at one point if it was possible to provide law enforcement services to the City on 8 Deputy Sheriffs and part of a Sergeant. It is not. It is a reasonable question for someone who is not well versed in the workings of law enforcement. We completely understand the question but operating law enforcement services with lack of adequate supervision/administration would not only place us in civil liability but potentially criminal liability. Several years ago, the FBI investigated the Los Angeles Sheriff's Department. At the end of their investigation, 21 officers were arrested. It's an interesting and complex case but it mainly came down to a lack of supervision which cause an unacceptable culture within that

agency. The Sheriff and Undersheriff were held accountable. The LASD Sheriff made a plea deal and was sentenced to probation. The Undersheriff in that case was sentenced to 5 years in prison. This case is currently used in law enforcement management trainings as a case study and warning for lack of supervision.

One way the Sheriff's Office is able to keep the costs down for the City is by sharing resources. To provide one peace officer on-duty 24/7, 365 days a year, the general rule of thumb is six (6) peace officers (a day, swing, and graveyard shifts). This is what is needed to take a basic or cold call for service. Priority or in-progress calls for service require a minimum two peace officer response for obvious officer-safety reasons. While the second peace officer is not always needed, it is needed to always be available. Having the second peace officer on-call is not reasonable due to the fact these type of life threatening calls cannot hold for an hour while an officer is called out from home, as these are emergency type calls for service. In order to accommodate this staffing level for the City of Willows, the Sheriff's Office would have to have twelve (12) line level peace officers in addition to the needed supervision and administrative staff. While trying to find cost-effective solutions to this problem, we have been running our own study since July 20, 2023. The object of this study is to determine how our response times/level of service are impacted if we use our South-Beat Deputy to provide the Willows-Beat Deputy with cover on priority/in-progress calls for service, and vice versa. Prior to running this study, we were seeing an average response time of 7 minutes and 31 seconds. We found that our average response time, using this modified system, from July 20, 2023 to August 29, 2023, was 7 minutes and 29 seconds. Given this new data, we feel we can use this system for the second cover peace officer and split the cost of that Deputy. This means that instead of requiring twelve (12) line level peace officers for the City of Willows, we would only need nine (9).

As previously mentioned, when reviewing needs to adequately staff/run law enforcement services for the City of Willows, the Department identified that administrative and clerical functions were not accounted for in the prior agreement and the Department experienced significant impacts. Workloads in the areas of clerical and evidence more than double with bringing on the City of Willows as a contract city. In addition to the current increased workload in these areas, we also took on all of the City of Willows' past workload. We have and maintain and actively manage all of the Willows Police Department's past evidence and prior Records Management System (RMS). Because of this, we were forced to go from a part-time to a full-time Evidence Tech. We are currently in the process of bringing on an additional part-time Evidence Tech to handle the increased workload, as we are finding even one full-time staff is not sufficient. In Clerical, we were forced to bring on an additional Office Technician and are in the process of bringing on yet another additional Office Tech to handle the increased workload.

Other unaccounted for services include Administration, Investigations and Major Crimes. During review, the Sheriff's Office interviewed Lieutenant Corbin and Sergeant Draper who oversee our Major Crimes Unit (MCU), which houses our Detectives. The MCU operate on a different RMS system than the main agency does. There is very restricted access to this system due to the highly confidential information it houses, such as confidential informant information. For example, I have the authority to look at that information but even I do not have access to it. Because of this, those statistics are not captured in our main RMS System. When asked what type of workload they are seeing with the City of Willows. They advised me their Willows caseload is currently lighter than normal but still well over 25% of total volume. They also informed me they are currently preparing for upcoming homicide trial, which had occurred in the City of Willows, which is extremely labor intensive.

Speaking with Sergeant Holley, the Patrol Commander, about what he is seeing with the City of Willows workload. He advised me that he feels it is approximately 50% of their workload. I asked him why that was when we only have one Deputy out of three or four on shift, assigned to the Willows-Beat, other than priority/in-progress calls for service. He explained to me that although a Deputy Sheriff may be assigned Willows-Beat on one day, such as a Monday, but that same Deputy is still writing reports and conducting follow-up on the next several days even though they are not assigned to Willows-Beat on

those shifts. He also stated that he handles the largest amount of complaints coming from the Willows area through our Internal Affairs Unit (IA).

The Sheriff's Office also looked at the Orland Police Department when developing a staffing structure for the City of Willows. We spoke with Chief Vlach and found they run a 13 peace officer department. We further discussed his budget but it was hard to determine what the actual amount was. Based on that conversation, the Orland Police Department has an operational budget and then draws funds from a "Proposition A" account. The Chief told me this fund is accessed by the Police Department, Fire Department and Public Works. Because of this, the amount drawn from this account changes from year to year based off the needs of the three departments. The Chief estimated they used approximately \$1.5 million from their operational budget and 1 million from the "Prop A" funds for a total of \$2.5 million. Although Glenn County Sheriff's Deputies are paid at a slightly higher rate, and have a slightly better benefits package than an Orland Police Officer, according to the recent Glenn County Grand Jury Report, the City of Orland expends 41% of their revenue on Police and Animal Control Services, while the City of Willows only spends 26% of theirs on the same type of services.

Based off all of the above research and analysis, the last spreadsheet the Sheriff's Office presented to the Ad Hoc Committee (Attached), outlined what the Sheriff felt the minimum staffing level for the City of Willows would be based on safety and adequate law enforcement services. The total cost for those services came to \$2,266,067.36.

Should the City of Willows and the Sheriff's Office reach an agreement on continued law enforcement services, the Sheriff's Office currently have individuals either in Backgrounds or on a hiring list for all of the above-mentioned positions, Evidence Tech through Lieutenant. Although the Department is beginning to test, advertise, and build hiring lists for these additional positions, we are in of a bit of a holding pattern waiting to see what happens with the City of Willows service agreement, as we will not need the additional positions if we reduce our workload by more than half.

In the area of Emergency Dispatching, analysis found that the City of Willows accounted for approximately 23.4737% of our total call volume countywide. We currently operate with eleven (11) Dispatchers (10 Line Staff and 1 Supervisor). Prior to 2017, the Sheriff's Office originally had eight (8) Dispatchers on staff. We increased our staffing in this area partly due to increased call volume and anticipation of bring on Fire Dispatch. In fiscal year 2016-2017, we fielded 14,869 calls through our Emergency Dispatch Center but in fiscal year 2022-2023 we saw that number increase to 20,471. I believe we would have reasonably added at least one (1) additional Emergency Dispatcher allocation to handle the 5,602 increase in call volume. Therefore, we calculated what 23.4737% of our cost is based on a nine person Emergency Dispatch Center. The total cost for those services came to \$205,639.45.

In the area of Animal Control, we found that Willows was 24.8401% of our Animal Control call volume over a three (3) year average. We currently employ two (2) Animal Control Officers, although we are currently working on adding an additional Officer due to increased call volume. We calculated 24.8401% of the cost of employing two (2) Animal Control Officers. We used the same 24.8401% to calculate the cost of Sheltering Services and Fleet Expenses. The total cost for those services came to \$98,906.74.

The total cost of all requested services (Law, Dispatch, and Animal Control) is \$2,570,613.55.

As mentioned above, based on our County Counsel's advice, we have to charge our actual cost for the services requested by the City. We are unable to charge any more or any less. We came to these figures using the fairest calculations and information we felt we could. If there was a question on a fee, the push went in Willows' favor. There are several resources we did not include when arriving to these figures because we felt we would have these resources regardless for availability to the County. Some of these include but are not limited to our Special Response Team, Licensed Drone pilots/operators, K-9 unit, Search and Rescue (SAR), VIPS, Etc.

To be completely transparent, the Sheriff's Office would love to see the City of Willows start back its own Police Department. There are some drawbacks such as the cost of overhead but there are far more

advantages to a city having their own Police Department. Local control, their own identity, and cost control are just a few.

One idea we had was for the Sheriff's Office to contract with the City of Willows, with a true-up clause combined with a Not to Exceed (NTE) clause. During this time period the City of Willows could hire a Chief of Police and Officer with the goal of taking over, initially, eight (8) hours of patrol coverage, while the Sheriff's Office would cover the other sixteen (16) hours of coverage. The Sheriff's Office would continue to reduce services, as they are no longer needed. We would also be reducing the billed amount to the City as services are reduced. In theory, this would allow the City of Willows to gradually build up the Police Department until which point the Sheriff's Office's services are no longer needed. The Sheriff's Office would be willing to use its Field Training Officers (FTO) to help facilitate in training the new Willows Police Department Officers.

As a second option, we did look at the City instantly starting up their own Police Department again but we discovered that would be cost prohibitive. We roughly estimated it would cost somewhere between 10 to 20 million dollars, depending on the level of service and level of equipment desired. There is also a hiring shortage throughout the United States for Law Enforcement. This would be an additional hurdle for the City to overcome in starting a Police Department all at once.

As stated above, the Sheriff's Office is positioning itself to begin hiring additional personnel throughout our positions but moving forward is somewhat what dependent on the City making a decision on what direction it wishes to proceed. Because we have been providing services to the City without a contract in place, we are currently unable to bill for services rendered. This puts the County in a position that cannot continue indefinitely. Without a contract City, the Sheriff's Office would instantly become fully staff and could go back to providing the services to county residents that they expect and deserve. Either way a decision has to be made.

Respectfully,



Travis Goodwin  
Glenn County Undersheriff



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Friday, September 22, 2023

City Manager Marti Brown  
201 N. Lassen Street  
Willows, CA 95988

Ms. Brown,

In the last few meetings with the Ad Hoc committee, we have expressed what the Sheriff feels is the minimum staffing levels for the City of Willows would be based on safety and adequate law enforcement services needed. As explained previously, we cannot negotiate costs, only level of services above that of the minimum level we are willing to provide. Entering into an agreement that does not comply with the provisions of section 51350 of the Government Code would be subject to challenge and could ultimately be set aside.

The Sheriff's Office calculated the actual costs of all law enforcement services being provided to the City of Willows, at current levels, at \$2,570,613.55 per year (Law Enforcement, Emergency Dispatch, and Animal Control). Since July 1, 2023, the Sheriff's Office has been providing these services to the City of Willows without a contract in place. Without a contract in place with an agreed upon amount for adequate compensation of services provided, the Glenn County Sheriff's Office has been unable to bill the City of Willows. To date, this fiscal year, the Glenn County Sheriff's Office has provided 84 days' worth of services without compensation, at a cost of \$591,593.52, to the County. This is simply not sustainable. The Glenn County Sheriff's Office cannot continue to operate in this fashion and must begin receiving compensation or discontinue services.

The City of Willows seems to be either unwilling or unable to cover the costs for the level of services it is currently being provided. We are therefore forced to drastically reduce services being provided to the City of Willows. We will begin reducing services on October 9, 2023.

We will notify the State of California that we are no longer in contract with the City of Willows for Law Enforcement services and an alternative source of services must be obtained. The Glenn County Sheriff's Office will continue to respond to felonies in progress while alternative Law Enforcement Services are obtained. All other calls for service will be directed to the City of Willows. Emergency Dispatch services will continue during this time as well. Animal Control services will cease on October 9, 2023.

While we remain open to communication with the City, we feel these steps must be taken, as we cannot continue to sustain the cost of providing services to the City without adequate compensation.

Thank you,

Justin Gibbs  
Glenn County Sheriff

A handwritten signature in blue ink, appearing to read "Justin Gibbs", written over a white background.

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**AMY TRAVIS**  
Deputy Director O.E.S.

Monday, September 25, 2023

City Manager Marti Brown  
201 N. Lassen Street  
Willows, CA 95988

Ms. Brown,

After meeting with Chief Monk on September 25, 2023, we have agreed to extend the termination of services from October 9, 2023, to October 16, 2023.

Sincerely,

A handwritten signature in blue ink, appearing to read "Travis Goodwin".

Travis Goodwin  
Glenn County Undersheriff

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