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Firefighters Union Local 4725 v. City of Brainerd

Supreme Court of Minnesota - October 9, 2019 - N.W.2d - 2019 WL 5057546

Firefighters union and union president brought action against city alleging unfair labor practices in violation of Public Employment Labor Relations Act (PELRA), violation of statutory requirements regarding amendment of city charters, and free speech retaliation arising from city's unilateral restructuring of its fire department, via a resolution, to eliminate paid full-time firefighter positions.

The District Court granted city's motion for summary judgment. Union and president appealed. The Court of Appeals affirmed in part, reversed in part, and remanded. City petitioned for further review.

The Supreme Court held that:

- City's resolution reorganizing its fire department clearly implicated matters of inherent managerial policy, for purposes of the PELRA provision governing mandatory bargaining; but
- In a matter of first impression, city's violation of PELRA provision that prohibited the unfair labor practice of interfering with the existence of an employee organization was not excused because the city's interference was a matter of "inherent managerial policy";
- The plain language of the PELRA provision which prohibited the unfair labor practice of interfering with the existence of an employee organization did not require that the public employer's interference be motivated by antiunion animus; and
- City engaged in an unfair labor practice in violation of the PELRA when it interfered with the existence of an employee organization by eliminating all paid full-time firefighter positions governed by a collective bargaining agreement, while it provided for paid on-call firefighters and a new assistant fire chief.