

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

**INTERNATIONAL ASSOCIATION OF
FIRE FIGHTERS #1366, CEDAR FALLS,**

Plaintiff,

vs.

CITY OF CEDAR FALLS,

Defendant.

Case No.

**PETITION FOR INJUNCTIVE
AND DECLARATORY RELIEF**

COMES NOW Plaintiff International Association of Firefighters #1366, Cedar Falls, (“Plaintiff” or “Local 1366”) by and through counsel, pursuant to Iowa Code § 400.17 and Iowa Rules of Civil Procedure 1.1501 and 1.1101, and for its claim against the defendant states:

PARTIES

1. Local 1366 is a labor organization representing personnel at the rank of fire fighter in the City of Cedar Falls, Iowa Fire Department. *See* Ex. A – Affidavit of Scott Dix ¶ 2.
2. Defendant, the City of Cedar Falls, Iowa, is a city as defined in Iowa Code § 362.2.

JURISDICTION AND VENUE

3. The Rules of Civil Procedure for the State of Iowa provide for parties to seek injunctions as independent remedies through actions in equity. Iowa R. Civ. P. 1.501.
4. This petition is supported by the Affidavit of Scott Dix, President of Local 1366, attached hereto as Exhibit A.
5. The Rules of Civil Procedure for the State of Iowa provide for parties to seek declaratory judgments even where other relief is available. Iowa R. Civ. P. 1.1101.

6. Venue for this action lies in Black Hawk County, Iowa, in which the City of Cedar Falls is located. *See Iowa R. Civ. P. 1.505 and Iowa R. Civ. P. 1.1101.*

FACTS

7. Iowa law provides that “a person ***shall not be . . . employed in any capacity*** in the fire or police department if the person is unable to meet ***reasonable physical condition training requirements and reasonable level of experience requirements*** necessary for performance of the position.” Iowa Code § 400.17 (emphasis added).

8. On June 3, 2019, the City Council of the City of Cedar Falls voted to approve nine promotions in the Cedar Falls Fire Department. These promotions are set to be implemented on June 29, 2019. *See Ex. A – Affidavit of Scott Dix ¶ 3.*

9. The promotions include seven new Public Safety Supervisor – Lieutenants (“PSS - Lieutenant”) positions and also two new Public Safety Supervisor – Captains (“PSS Captain”) positions. *See Ex. A – Affidavit of Scott Dix ¶ 4.*

10. All of the personnel promoted were Public Safety Officers who were, or are currently, Cedar Falls Police Department employees. All of the professional Fire Department employees who applied for the PSS – Lieutenant and PSS – Captain positions were eliminated immediately after submitting their applications, and none were allowed to proceed any further through the promotional process. *See Ex. A – Affidavit of Scott Dix ¶ 5.*

11. Upon information and belief, before 2016, the City of Cedar Falls had a paid on-call (“POC”) program which provided for non-Fire Department employees to work part-time hours in the Fire Department in a ***limited*** capacity. This included employees in the Police Department. The POC program continued for employees outside the Police Department after

2015, but for employees in the Police Department the program was superseded by the Public Safety Officer (“PSO”) program. *See Ex. A – Affidavit of Scott Dix ¶ 6.*

12. Under the POC program Police Officers worked 16 hours per month in the Fire Department, four hours of which was spent training. During the 12 hours per month that Police Officers served in a POC capacity, they rode on fire apparatus, but *they did not* perform full fire-fighting functions. They performed secondary tasks such as rolling up hose and loading it on the truck, changing out air bottles, cleaning equipment, and other non-life safety critical duties. They did not perform life safety critical duties, such as first entry into buildings, pump operator duties, or acting officer duties. These POC employees were considered supplemental personnel and did not count toward minimum staffing. *See Ex. A – Affidavit of Scott Dix ¶ 7.*

13. Upon information and belief, between January 2016 and October 2018, the date that the PSO program began for Police Department employees, the PSOs were not scheduled to work any hours at the fire station other than four training hours per month, besides other periodic additional training. Thus, as PSOs before October 2018, no PSO regularly accumulated *any* practical fire fighting experience, and no PSO worked full-time in the Fire Department. *See Ex. A – Affidavit of Scott Dix ¶ 8.*

14. Although, as detailed *infra*, a total of eight PSOs have been transferred into the Fire Department since October 2018, no other PSOs are scheduled to work any hours out of the fire station. When the Fire Department issues a general alarm, PSOs working at the Police Department report to the scene in their squad car. Off-duty PSOs report to the fire station and, either wait to assist with returning an apparatus to service after the incident is cleared or respond to the scene on an apparatus if available. However, their response is not mandatory. They are expected to respond to general alarms “if available.” The only exception is that one PSO in the

Police Department **may** be designated for mandatory response, if the Fire Department falls below minimum staffing. *See Ex. A – Affidavit of Scott Dix ¶ 9.*

15. The current rank structure in the Fire Department, in ascending order of authority, is: Fire Fighter, Fire Captain, Battalion Chief, Fire Chief. The City intends to insert PSS-Lieutenant positions into the Fire Department hierarchy between the existing ranks of Fire Captain and Battalion Chiefs. The City intends to insert the PSS - Captain positions into the Fire Department hierarchy between the existing ranks of Battalion Chief and Fire Chief. Therefore, the PSS – Captains will be the second-highest ranking officials in the Fire Department. *See Ex. A – Affidavit of Scott Dix ¶ 10.*

16. The Cedar Falls Fire Department is currently staffed by 25 platoon personnel, who work 24-hour shifts. These include nine professional Fire Fighters, four Fire Captains, three Battalion Chiefs, a Fire Chief, and eight Public Safety Officers who are designated as Fire Fighters. As detailed *infra*, the City intends to promote three of the PSOs currently in the Fire Department, and six PSOs who have not yet worked a single day in the Fire Department in any full-time capacity. *See Ex. A – Affidavit of Scott Dix ¶ 11.*

17. The new PSS – Captains will be higher in the chain of command than all but one of the existing Fire Department personnel—the Fire Chief. The new PSS – Lieutenants will be higher in the chain of command than 18 of the existing Fire Department personnel. *See Ex. A – Affidavit of Scott Dix ¶ 12.*

18. While on duty, the Fire Department’s platoon personnel are responsible for responding to emergencies, including, but not limited to, structure fires, motor vehicle accidents, medical calls, hazmat-related incidents, industrial accidents, and water rescues. Such

emergencies present immediate risks to the safety and health of the responding platoon personnel, as well as members of the public. *See Ex. A – Affidavit of Scott Dix ¶ 13.*

19. Fire Captains in the Cedar Falls Fire Department are required to have knowledge of: 1) modern firefighting and rescue techniques, methods, and practices, 2) mechanical, chemical, and related characteristics of a wide variety of flammable, explosive, and similar materials, 3) operation and maintenance of firefighting apparatus and specialized materials, first aid, and rescue methods and techniques. *See Ex. A – Affidavit of Scott Dix ¶ 14.*

20. Currently, Fire Captains in the Cedar Falls Fire Department are required to have four years of firefighting experience in a municipal fire department with a minimum of one year at the City of Cedar Falls. The job description does not specify what kind of firefighting experience Fire Captains are required to have (*e.g.*, volunteer vs. professional, part-time vs. full-time). In addition to possession of a Firefighter I Certification, Fire Captains are required to have possession of ***or ability to obtain*** possession of a Firefighter II Certification, a Fire Service Instructor I Certification, and/or a Fire Officer I Certification. *See Ex. A – Affidavit of Scott Dix ¶ 15.*

21. Before December 17, 2018, Fire Captains were required to have four years of ***professional*** firefighting experience in a municipal fire department, with one year of such experience in the City of Cedar Falls. In addition, Fire Captains were required to ***hold*** a Firefighter II Certification and a Fire Service Instructor I Certification. Thus, the current certification and experience requirements for Fire Captains represent a dilution of the previous standard for Fire Captains in the Cedar Falls Fire Department. *See Ex. A – Affidavit of Scott Dix ¶ 16.*

22. Currently, when serving as Shift Captain, Fire Captains in the Fire Department are responsible for responding to fire alarms and direct firefighting and rescue operations of a fire company or multiple fire companies, commanding emergency incidents until and if relieved of command by a superior officer, and participating in fire-fighting and rescue work. Fire Captains order initial evacuation, entry by fire fighters, and call for mutual aid and additional equipment upon arrival at a fire unless superior officer is already present. *See Ex. A – Affidavit of Scott Dix ¶ 17.*

23. The essential duties and responsibilities for the new PSS – Lieutenants, who will outrank Fire Captains, include: 1) supervising and coordinating the staffing and operational activities for an assigned patrol/fire shift, the investigative unit, or the support services unit, 2) respond to fire alarms and direct firefighting and rescue operations of a fire company or multiple fire companies, 3) taking command at emergency incidents until and if relieved of command by a superior officer, 4) participating in fire-fighting and rescue work, 5) ordering initial evacuation, ordering entry by fire fighters, calling for mutual aid, and calling for additional equipment upon arrival at a fire unless superior officer is already present, and 6) acting as incident commander during major public safety incidents. *See Ex. A – Affidavit of Scott Dix ¶ 18.*

24. The PSS – Lieutenant position requires four years of ***public safety*** experience, including an unspecified amount of experience as a firefighter and a police officer or police reserve officer. It also requires possession of certification as a police officer or reserve police officer from the State of Iowa and possession of a Fire Fighter I certification. Finally, the PSS – Lieutenant position requires possession of ***or ability to obtain*** Firefighter II Certification, Fire Service Instructor I Certification, and Fire Officer I Certification. *See Ex. A – Affidavit of Scott Dix ¶ 19.*

25. Thus, the PSS – Lieutenant position, which outranks the Fire Captain position in the Fire Department, and which has operational responsibility, not only for commanding incidents, but also for performing firefighting and rescue work, requires less firefighting experience than even the current diluted requirements of the Fire Captain positions, which they oversee. *See Ex. A – Affidavit of Scott Dix ¶ 20.*

26. Battalion Chiefs in the Cedar Falls Fire Department are required to have knowledge of: 1) use of the incident management and personnel accountability system, 2) operation, maintenance, and uses of modern firefighting apparatus and equipment, 3) operational characteristics, services, and activities of comprehensive fire suppression and prevention programs and emergency services, 4) first aid procedures and practices, 5) various building construction techniques and the consequence of each type on fire suppression and prevention activities, 6) safe work practices and procedures, and 7) principles of supervision, training, and performance evaluation. In addition, Battalion Chiefs must be able to operate under the incident command system and safely operate department vehicles, apparatus, and other emergency equipment. *See Ex. A – Affidavit of Scott Dix ¶ 21.*

27. Currently, Battalion Chiefs in the Cedar Falls Fire Department are required to have six years of firefighting experience, including at least two years of supervisory experience as a Cedar Falls Fire Captain or a Cedar Falls Public Safety Supervisor – Lieutenant. They are also required to have Fire Fighter I, Fire Fighter II, Fire Officer I, and Fire Instructor I certifications. *See Ex. A – Affidavit of Scott Dix ¶ 22.*

28. Currently, when serving as Shift Battalion Chiefs, Battalion Chiefs in the Fire Department are responsible for, *inter alia*: 1) coordinating operations of activities of a fire shift, 2) ensuring appropriate service and staffing levels exist for assigned shift, 3) serving as incident

commander at fire scenes and other emergency situations, 4) directing fire personnel at the scene of an emergency unless relieved by the Fire Chief or Administrative Division Battalion Chief, and 5) utilizing appropriate emergency management and incident command system. *See Ex. A – Affidavit of Scott Dix ¶ 23.*

29. Before December 2018, Battalion Chiefs in the Cedar Falls Fire Department were required to have *five years of professional firefighting experience*, including two years of lead supervisory experience in a company officer role. In addition, Battalion Chiefs were required to **hold** a Firefighter II Certification, a Fire Officer I Certification, and a Fire Instructor I Certification. Thus, the current Battalion Chief experience requirements are a dilution of the previous standards for Battalion Chiefs in the Cedar Falls Fire Department, in order to allow a candidate to meet the experience requirement entirely by working as a Public Safety Supervisor – Lieutenant in the Police Department. *See Ex. A – Affidavit of Scott Dix ¶ 24.*

30. The PSS – Captains are responsible for, *inter alia*: 1) managing, supervising and coordinating the operational activities for an assigned fire shift, 2) serving as incident commander at fire scenes and other emergency situations, 3) directing fire personnel at the scene of an emergency unless relieved by Fire Chief or Administrative Division Battalion Chief, 4) utilizing appropriate emergency management and incident command system. *See Ex. A – Affidavit of Scott Dix ¶ 25.*

31. PSS – Captains are required to possess knowledge of, *inter alia*: 1) use of incident management and personnel accountability system, 2) operation, maintenance, and uses of modern firefighting apparatus and equipment, 3) operational characteristics, services and activities of comprehensive fire suppression and prevention programs and emergency services,

and 4) hazardous or toxic materials storage, transport and clean-up. *See Ex. A – Affidavit of Scott Dix ¶ 26.*

32. PSS – Captains are required to be able to, *inter alia*: 1) safely operate department vehicles, apparatus and other emergency equipment, and 2) demonstrate and use CPR and first aid when necessary. *See Ex. A – Affidavit of Scott Dix ¶ 27.*

33. PSS – Captains are required to have a minimum of six years of **public safety** experience, which must include an unspecified amount of experience as a fire fighter and as a police officer or police reserve officer with two years supervisory experience with the City of Cedar Falls. In addition to not specifying the amount of firefighting experience required, the PSS – Captain job description does not specify what kind of firefighting experience is required (e.g., professional vs. volunteer, part-time vs. full-time). In addition, PSS – Captains are required to: 1) possess a police or reserve officer certification and an appropriate Fire Fighter I Certification, 2) possess or have the **ability to obtain** appropriate Fire Fighter II Certification and specialized training certifications, Fire Instructor Certification, and Fire Officer I Certification. *See Ex. A – Affidavit of Scott Dix ¶ 28.*

34. Thus, the PSS – Captains are required to have less specific firefighting experience and are required to hold fewer certifications than the Battalion Chiefs whom they oversee in the Fire Department. *See Ex. A – Affidavit of Scott Dix ¶ 29.*

35. In performing their required duties Fire Captains and Battalion Chiefs are responsible for ensuring the safety of the platoon personnel whom they oversee as well as the safety of members of the public. *See Ex. A – Affidavit of Scott Dix ¶ 30.*

36. Possessing the requisite level of training and experience is critical to the ability of the Fire Captains and Battalion Chiefs to perform these duties. *See Ex. A – Affidavit of Scott Dix ¶ 31.*

37. Through the planned implementation of the PSS Lieutenant and PSS Captain positions in the Fire Department, the City of Cedar Falls is placing the responsibility for ensuring the safety of members of Local 1366, as well as the safety of members of the public, at the scenes of emergencies in the hands of personnel with less than eight months' of full-time experience in the Cedar Falls Fire Department (and, in the case, of six PSOs—one PSS – Captain and five PSS – Lieutenants—no full-time experience in the Cedar Falls Fire Department at all).

See Ex. A – Affidavit of Scott Dix ¶ 32

38. The City intends to promote two former Police Captains to the position of PSS – Captains in the Fire Department:

- a) Captain Smith (Police Captain) – Transferred from Cedar Falls Police Department to Cedar Falls Fire Department in October 2018. He has worked full-time in the Fire Department since October 2018, nominally as a fire-fighter. Local 1366 is unaware of any other full-time firefighting experience Captain Smith has. The only firefighting certification Captain Smith possesses is Firefighter I. Captain Smith worked under the POC program, prior to becoming a PSO.
- b) Captain Howard (Police Captain) – Has never worked full-time in the Cedar Falls Fire Department. Local 1366 is unaware of Captain Howard possessing any full-time firefighting experience. The only firefighting certification Captain Howard possesses is Firefighter I.

See Ex. A – Affidavit of Scott Dix ¶ 33.

39. The City promoted seven employees to the position of PSS – Lieutenant. Of these seven employees, two were transferred from the Police Department to the Fire Department in October 2018 (Shea McNamara and John Zolondek). The other five have never worked as a full-time employee of the Cedar Falls Fire Department. *See Ex. A – Affidavit of Scott Dix ¶ 34.*

- a) The promotions of Lieutenant McNamara and Lieutenant Zolondek to PSS – Lieutenant positions were announced on June 3, 2019.
- b) Local 1366 is unaware of any full-time fire-fighting experience that Lieutenant McNamara had prior to his transfer to the Cedar Falls Fire Department.
- c) The City asserts that Lieutenant Zolondek had prior firefighting experience in Winona, Minnesota from 2004 to 2007 (more than a decade ago). Lieutenant Zolondek worked under the POC program, prior to becoming a PSO.

See Ex. A – Affidavit of Scott Dix ¶ 34.

40. The other five individuals the City has announced it will promote to the position PSS – Lieutenant are non-ranking employees in the Police Department (Marty Beckner, Brooke Heuer, Dennis O’Neill, Kari Rea, and Kelli Yates). These Police Officers have never worked a day as full-time employees of the Cedar Falls Fire Department. Local 1366 is unaware of any full-time firefighting experience or certifications beyond Firefighter I possessed by these five officers. *See Ex. A – Affidavit of Scott Dix ¶ 35.*

41. When the City transferred Lieutenant McNamara and Lieutenant Zolondek (along with other Police Department employees) into the Fire Department, it placed them nominally into fire fighter positions, the lowest position in the rank structure of the Fire Department. Nevertheless, despite these new employees having no experience in the Cedar Falls Fire Department, the Department assigned them supervisory tasks, including training the PSOs who

were transferred to the Fire Department in March 2019. In addition, the Department has assigned Lieutenant McNamara, Lieutenant Zolondek and the other transferred PSOs to work as driver operators, engineers, and acting officers. The PSOs have taken over administrative functions, including scheduling, facilitating call-backs, and daily staffing. *See Ex. A – Affidavit of Scott Dix ¶ 36.*

42. PSOs transferred to the Fire Department are not required to complete the Candidate Physical Agility Test, which requires candidates for firefighting positions to perform an array of physical tasks based on scenarios that Firefighters could face in the field. For instance, Fire Fighters have to wear a 50-lb vest throughout the testing to simulate the weight of their turnout gear and self-contained breathing apparatus; they have to navigate a maze designed to test their propensity for panic and/or claustrophobia in tight spaces; they have to drag hose, etc. In contrast, the Police Department, where PSOs perform their physical fitness testing, have to pass a Modified Cooper test, that requires them only to perform push-ups, sit-ups, and a mile and a half run. *See Ex. A – Affidavit of Scott Dix ¶ 37.*

43. The PSOs that the City intends to promote were not required to pass any written or practical Firefighting exam or any Firefighting agility test. *See Ex. A – Affidavit of Scott Dix ¶ 38.*

44. Despite the operational nature of the PSS – Lieutenant and PSS – Captain positions, the Department does not require these personnel to meet the same physical fitness requirements as the rest of the operational personnel in the Department. *See Ex. A – Affidavit of Scott Dix ¶ 39.*

45. Upon information and belief, there is no professional fire department in the State of Iowa that does not require full-time fire fighter experience in that department in order to

obtain a promotion in the department. Moreover, when Firefighters transfer into a new department, they are brought on as probationary Firefighters regardless of their rank or length of experience in their previous department. *See Ex. A – Affidavit of Scott Dix ¶ 40.*

46. Putting employees with extremely limited or no practical experience in the fire service in charge at the scene of emergencies poses a direct threat to the safety of Local 1366's members as well as to the safety of the citizens of the City of Cedar Falls. *See Ex. A – Affidavit of Scott Dix ¶ 41.*

47. The City's planned implementation of these nine promotions, constitutes a direct threat to the safety of Local 1366's members as well as to the safety of the citizens of the City of Cedar Falls. *See Ex. A – Affidavit of Scott Dix ¶ 42.*

COUNT I: REQUEST FOR INJUNCTIVE RELIEF

48. Local 1366 hereby incorporates and re-alleges paragraphs 1-47 as if fully set forth herein.

49. Local 1366 has not previously presented a petition for a temporary injunction, restraining order, or other injunctive relief to, nor has a petition been denied by any Judge of the Iowa District Court.

50. In Iowa, injunctive relief will be granted where the party seeking injunctive relief shows that “(1) an invasion or threatened invasion of a right; (2) that substantial injury or damages will result unless the request for an injunction is granted; and (3) that there is no adequate legal remedy available” *Sear v. Clayton Cnty. Zoning Bd. of Adjustment*, 590 N.W.2d 512, 515 (Iowa 1999).

51. As set forth above, Iowa Code § 400.17 prohibits cities in Iowa from employing employees in fire departments if they are unable to meet ***reasonable physical condition training***

requirements and reasonable level of experience requirements necessary for performance of the position.

52. The PSS – Lieutenants have manifestly less stringent full-time professional fire-fighting experience and certification requirements than even the diluted requirements for the Fire Captains whom they would oversee.

53. The disparity between the experiential and certification requirements for PSS – Lieutenants and those for Fire Captains—especially viewed in light of the pre-December 2018 requirements for Fire Captains—shows that the requirements for the PSS – Lieutenants are not reasonable and are a threat to the safety of firefighters and the public.

54. The PSS – Captains have manifestly less stringent full-time professional fire-fighting experience and certification requirements than even the diluted requirements for the Battalion Chiefs whom they would oversee.

55. The disparity between the experiential and certification requirements for PSS – Captains and those for Battalion Chiefs—especially viewed in light of the pre-December 2018 requirements for Battalion Chiefs—shows that the requirements for the PSS – Captains are not reasonable and are a threat to the safety of firefighters and the public.

56. Furthermore, the PSOs that the City intends to promote to the PSS – Lieutenant and PSS – Captain positions were subjected to far less strenuous and less job-related physical testing than the professional fire-fighting personnel in the Cedar Falls Fire Department. The Modified Cooper test fails to test candidates' ability to withstand physical exertion while wearing heavy fire-fighting protective equipment, and it fails to test their ability to perform strenuous work in tight spaces.

57. It is manifestly in the public interest that immediate injunctive relief be entered to prevent the unlawful practices described herein and to minimize the immediate substantial, and irreparable harm that Local 1366's members will incur if the defendant implements the nine promotions discussed herein on June 29, 2019.

58. No legal remedy will suffice to alleviate the risk to which Local 1366's members will be exposed if the nine PSS – Lieutenant and PSS – Captain promotions are implemented on June 29, 2019.

COUNT II: DECLARATORY JUDGMENT

59. Local 1366 hereby incorporates and re-alleges paragraphs 1-58 as if fully set forth herein.

60. The Rules of Civil Procedure for the State of Iowa permit actions seeking declaratory judgments. R. Civ. P. Rule 1.1101. Parties may seek declaratory judgments declaratory judgments even where another remedy exists. *Id.*

61. As set forth above, Iowa Code § 400.17 prohibits employment of personnel in fire departments who are unable to meet ***reasonable physical condition training requirements and reasonable level of experience requirements*** necessary for performance of the position.

62. Local 1366 has a legitimate interest in the proper application of section 400.17 because its members will be placed in danger if the PSS – Lieutenant and PSS – Captain promotions are implemented on June 29, 2019.

63. Local 1366 seeks a declaratory judgment from this Court that the employment of the nine candidates slated for promotion to PSS – Lieutenant and PSS – Captain positions on June 29, 2019 are unlawful because they violate the requirements of Iowa Code § 400.17.

PRAYER FOR RELIEF

A. After a hearing on the merits, enter a permanent injunction pursuant to Iowa Code section § 400.17 and Iowa Rule of Civil Procedure 1.1501 to enjoin the defendant from implementing the promotions to the positions of PSS – Lieutenant and PSS – Captain announced on June 3, 2019 which violate Iowa Code § 400.17;

B. To the extent the City implements PSS – Lieutenant and PSS – Captain positions in the Cedar Falls Fire Department, require that defendant rescind the promotions and run a promotional process that requires that candidates for these positions demonstrate the reasonable experience, training, and education required by Iowa Code § 400.17.

C. A declaratory judgment that the nine promotions to the PSS – Lieutenant and PSS – Captain positions in the City of Cedar Falls Fire Department constitute unlawful violations of Iowa Code § 400.17.

D. Enter such other equitable relief as the Court believes fair and appropriate, including but not limited to attorneys' fees and costs.

Respectfully submitted,

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