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THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: August 12, 2026

TO: Robert L. Logan, Fire Chief, Fire-Rescue Department

FROM: Erin Houston, Equal Employment Investigations Manager, Personnel Department

SUBJECT: Equal Employment Opportunity Complaint Findings – Lifeguard Division Culture

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This report is an overview of the Equal Employment Investigations Office (EEIO) investigation and for your review purposes only. If you choose to proceed with disciplinary action based on EEIO's investigation, please request a separate report for that purpose.

On April 15, 2026, employees reported that [redacted] with the Fire-Rescue Department, made an Instagram post that alleged that the Lifeguard Division fostered a culture of harassment based on sex. Pursuant to Personnel Manual Index Code K-2, the City of San Diego Equal Employment Opportunity Policy, the U.S. Equal Employment Opportunity Commission (EEOC) anti-discrimination guidelines, and the State of California Civil Rights Department (CRD) anti-discrimination guidelines, the EEIO conducted an investigation into the allegations.

In the course of this investigation witnesses demonstrated tremendous fear in speaking to EEIO about their experiences, citing instances when women had been punished for reporting sexual harassment. Due to this fear, the identity of witnesses has been removed.

Per the request of the Fire-Rescue Department, please find a summary of the allegations and findings of the investigation below.

Summary

[redacted] wrote in her Instagram post, "In navigating the subtle but pervasive sexual harassment that this service fosters since I joined in [redacted]...To be a woman in this space is to place your own actions under a microscope, constantly examining yourself for any wrong move. It is to understand that you must be exceptional on every front, or run the risk of your competency and merit being questioned in harsher terms than your male counterparts. There have been countless instances where I smiled or nodded or shrugged things off silently because I did not want to make waves. I just wanted to do my job in peace, and perhaps these are just the things that women must accept to do this job...I know now that my crime was being a powerful young woman in the pursuit of her dreams. To hold that dream required my silence...I have heard the way lifeguard folk talk about the women who 'make noise', and how so often the noise in question is women finally asserting the fullness of their own humanity in a space which has systemically denied them of it."

Witness 4 said that she had been [redacted] during her time in the Lifeguard Division and that "the [redacted] is partly from the calls, but equally because what I have dealt with, the sexual harassment, the intimidation, and the hostile work environment. I feel like I can't work with men again. I avoid men. I can't go for a job in the fire department. I can't work in a male-dominate place again."

Eighteen people were interviewed or provided written statements about their experience as a woman or female-presenting person in the Lifeguard Division. Witnesses were a mix of current and former employees and held the position of [redacted] They identified the following areas of consistent harassment based on sex:

Allegation #1: Witnesses stated that the male-dominated environment forces women into a hypercompetitive environment.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Witness 2 also stated that even after placement, the environment is extremely competitive for women. She stated, "You have to be one of the boys. You have to be willing to screw over other women. It's very isolating and very difficult." Witness 10 recalled "...I have been pushed out of the way to hop in the truck even though I was right there, but it's a very competitive and macho environment. It's always watch me, I'm the best." Witness 17 stated, "It's so hard to get in with the boys and be accepted. There's this emphasis on not wanting to be one of those girls who causes more work for people because you cause problem and are too sensitive." Witness 7 agreed and added, "The beaches that have training have insidious, competitive workplaces." Witness 6 stated, "Just in general it felt like women were being pitted against each other."

Witness 18 stated, "When you are the only women, you feel othered, perceived more than your male coworkers. There is a need to prove yourself more and show that you are more physically capable, to outperform everyone in order to get the basic respect from men. A male and female can both be underperforming, but the female will get more attention for it. Because she is the only woman, they will talk more about how they need to be able to trust her and trust that she could do her job, but the male will just get away with underperforming. It creates competition amongst women. We're trying to see which girls can handle it and which can't. It creates a 'pick me' mentality. It was sad. The women would begin to compete with each other. You try to separate yourself from the other girls – those who are struggling in physical challenges or because you don't want to be perceived as gossipy like other girls."

Six other witnesses reported being required to physically prove themselves more than men in order for male coworkers to trust them to perform their duties. Witness 5 recalled, "In my own internal dialog, I felt like I have to work twice as hard to be half as good. I had to prove myself to the men. They expected so little from me because I was a woman." Witness 17 stated that the environment showed her that "I had to earn my spot more than men. Men deserve to be there, and women have to fight to be there. There's just an attitude that you were only hired because you are a woman or you are lesser because you are a woman." Witness 11 said that she had "...to pay my dues more than first year guys. When it was happening, it felt like I was having to prove myself because I wasn't in the "in club" and I wasn't trusted. In wasn't until I was on the inside and very much respected, then I could see that men were treated better. Knowing I had to put in a lot more effort to get to this point than they did was frustrating."

Allegation #2: Witnesses reported feeling isolated and excluded by their male colleagues on a regular and often daily basis.

[redacted] first reported the concern, stating, "It's the feeling you have when you walk in the room and the conversation stops. I went weeks without any male coworkers talking to me. It seems like it isn't a big deal, but it eats away at you." Nine other women expressed feeling similarly. Witness 10 said, "I think it can feel like a boys' club at times...I come back from a workout or a tower watch, and the boys will be paling out in the kitchen and the conversation and tone will immediately change when I enter in the room." Witness 17 called the lifeguard

[redacted]

services "a place of toxic masculinity to the extreme." She added that when she was a [redacted] she worked in the same area as the [redacted] which was made up primarily of older men. She said, "I'd go in to fill my water bottle, and no one would talk to me. They wouldn't even look at me. It's like I wasn't there. But [redacted] [her male colleague] would fill his water bottle, and everyone was slapping him on the back. He was in with the boys. Every day I showed up to work there, I was so uncomfortable. No one talks to you, only men surrounding me. No one makes you feel welcome." Witness 5 said that in the past she avoided being seen as the person who reported behavior because "…you don't want to be the one girl who walks into the room and people stop talking…I have heard male coworkers talk about their disdain for that type of behavior…"

Witness 1 stated that she felt othered because "men will 'bro-out' with each other, physically hype each other up, hug, smacks on the butt, other inappropriate touching, handshakes, etc. but not with women. They will just skip over the women." Witness 10 shared, "I had a summer when I was a [redacted] There were three lifeguard 1s and a lifeguard 2…I felt like I was banging my head against the wall. I would give instructions or really say anything and unless a male coworker repeated what I said, [one of the lifeguard 1s] would not hear me say it. The other two men said they noticed the same thing." Witness 18 stated, "When I first started at the [redacted], they have separate locker rooms for men and women, but it had been a while since there was a woman working there, so they just used the women's locker room as storage. They didn't clear it out when I started, and someone just came into the locker room when I was there without knocking to get something out of storage. I wasn't undressed or anything, but the space wasn't respected. Women's space is either nonexistent or not respected." Witness 18 added, "My experience the last three years, I didn't work with a single other woman. It was just me and a bunch of dudes…That boys clubby thing will…it makes you feel a type of way. It was part of the reason I left."

Allegation #3: Witnesses reported that their male coworkers have said the only reason they were hired or other woman were hired is because of gender.
Ten women reported that men had told them personally that the only reason they were hired or promoted was because they were women. They also reported that whenever another woman was promoted, they would hear men making similar statements about them. Witness 12 said, "For Lifeguard 2s, it's very competitive. I have heard that person was only hired because they are a woman or they are a diversity hire, or a personal friend of mine was told to [redacted] face that [redacted] was only hired because [redacted] It really affected [redacted]. I think it's a very common belief in the service." Witness 10 stated, "Unfortunately I think that there is a feeling that successful women sleep their way to the top. I've heard that many times." Witness 9 added, "Guys talk shit about how we got though [the academy] because we are women and not because we earned it." Witness 17 stated, "…when you're surrounded by a language, it wears on you and makes you doubt your ability to do the work over time."

Allegation #4: Witnesses reported that their schedule selections were negatively impacted by their gender.
Witness 5 reported that when she was [redacted] she started [redacted] training but was [redacted] before she could finish. During the schedule selection process, she selected a [redacted] schedule but was told it couldn't be assigned to her because she wasn't fully [redacted] yet. Witness 5 recalled that no one below her in seniority had more [redacted] training than she did, but the man managing the selection process still wouldn't allow her to select the schedule. In the end, the scheduler allowed a less senior man who had no [redacted] training to select the schedule.

While Witness 5 hasn't been a [redacted] Witness 9 and Witness 8 provided more recent examples. Witness 9 stated, "[Male [redacted] obviously want to work with their male buddies and not with you as a woman. During schedule picks, guys will ask girls not to select certain locations so they can work with their male buddies." Witness 8 added, "Schedule picks are [related to gender]. Guys want to work with their boys. You don't want to be in those places. You can feel so excluded there, so you learn which ones to avoid."

Witness 18 stated that this also occurs for [redacted]. She said, "There was a year where a bunch of girls picked [redacted] based on their seniority. Then Leadership made a decision that they didn't want all the girls working together; women needed to be spread out across the divisions, so they made them split up. It was like that they didn't trust the women to hold down that station, so they needed to be split up."

Allegation #5: Witnesses reported that male coworkers made negative comments about their bodies and that uniform standards are more strictly enforced for women.
Four witnesses stated that either male coworkers made negative comments about their bodies and how they looked in swimsuits or made similar comments about other women. Witness 14 recalled that the comments were generally about a female employee's weight and how that makes them look in their swimsuit.

Four witness also stated that they felt supervisors enforced uniform standards more strictly for women than men. Witness 11 stated that women talked about how she looked in a swimsuit, "but in the context of, you should have this kind of swimsuit or make sure this is covered so we can make sure you're taken seriously, especially in the [redacted] She added, "...When you are wet, you are told to dry off and cover up as soon as possible to remain professional, but I was told that more than men. I'd be told to put on a shirt when the guy next to me was shirtless. It only came from female superiors though." Witness 18 also recalled a time when a female [redacted] was told she needed bottoms with more coverage because men were looking at her butt and making sexual comments.

Allegation #6: Witnesses reported frequently being sexually harassed by male members of the public without appropriate support from their supervisors.
The majority of witnesses reported being sexually harassed by members of the public. Witness 14 stated, "As a [redacted] I couldn't believe that I would have to come to work and defend myself from men on the beach, getting cat calls, hearing comments about my body, while my male coworkers were out there giving their numbers out and hitting on girls. It's just so starkly different." Witness 11 added that it was normal to encounter "...cat calls and people not leaving you alone and faking drowning." Witness 7 shared, "I do think that due to the nature of the job, women stand out to the public eye. Victims I've tried to rescue will reject my help because I'm a woman or tried to flirt with me as they are drowning." Witness 4 agreed that it was frequent and recalled that she would call out men sexually harassing female lifeguards over the loudspeaker to make them stop, but she acknowledged that other supervisors do not provide that type of support, and women are left to fend for themselves.

Witness 17 stated that a male citizen stalked her while at work, and she received inadequate support from her supervisors. The citizen started by taking pictures of her on the beach and in a lifeguard tower and bringing her copies, and it escalated to him taking hundreds of pictures

of her including long-distance photos of her in her car. She reported it to a lifeguard 2[2] and said that it made her uncomfortable, and he didn't take it seriously. She said, "It's so hard to get in with the boys and be accepted. There's this emphasis on not wanting to be one of those girls who causes more work for people because you cause problem and are too sensitive. He didn't think it was a big deal, so I didn't want to create more work for this guy and make it a big deal." The citizen then began to follow her at work, search for her in different lifeguard towers, and approach her while she made rescues. She finally told another supervisor what was happening. She recalled crying uncontrollably and the supervisor leaving her in the tower to continue to watch the water even though she was emotionally unstable. She was eventually relieved and met with a "group of male supervisors" who chastised her for not reporting it earlier. She recalled telling them everything that had happened, and they told her to go home and lock her doors. She said that the next day the police came to the beach so she could make a report, but she was too terrified to leave her home, and no one provided her the information to make a police report on her own. Witness 17 also recalled that she continued to see the citizen on the beach, hiding behind objects and taking pictures of her. She said, "There weren't any protections in place. At no time did it feel safe. The only time they took it seriously was when another [redacted] female had another interaction with this guy," and she made a report. Witness 17 said, "Even then, they didn't send out an email that people should be aware of this guy. Women only knew if I told them. It didn't feel like people were sensitive to it. I was so scared, and no one else cared. It wasn't serious to anyone else, but it was very serious to me. It was just that if you see him again, let me know, and we'll call the cops."

Allegation #7: Witnesses reported that male employees frequently make harassing comments based on sex about and to citizens.

The majority of witnesses said that it is common to hear male colleagues make sexual comments about and to female citizens on the beach. Witness 9 said the comments would happen more frequently earlier in her career and now "the longer I'm working, the more afraid they are of me. They watch what they say in front of me." She also stated that if she sees a male employee make a comment about a female citizen or "crane his head to look at a girl on the beach," she will say something to him about it. Witness 8 added, "The guys are bad and will use their binoculars to look at women on the beach. I have called them out for that." Witness 14 stated, "I've seen a lot of male coworkers talk about patrons' bodies or go hit on them. Summer's busier. I guess it happens once a day at stations between the guys during the summer." Witness 7 said, "There's been plenty of days I worked where male lifeguards talk about female patrons they find attractive. I've heard so many stories of lifeguards hitting on women on the beach. I've also been asked if I find that person attractive…some male lifeguards have pursued people they've seen on the beach." Witness 6 added, "I remember I was waiting for someone to relieve me, and they were held up because they were flirting with these girls walking down the boardwalk."

Witness 15 recalled that a lifeguard who was training them looked down from the tower, saw a "transmasculine person with top-surgery," and said "that people like that shouldn't be allowed to have their shirts off at the beach because they are women."

[2] Witness 17 was fearful to provide this employee's name. [redacted]

Allegation #8: Witnesses reported that male coworkers made harassing statements based on sex to them.

The majority of witnesses stated that male coworkers had made sexual comments or jokes to them. Witness 8 stated, "My very first year I had a mentor, it's a lifeguard 2 or 3 who works the same days as you. I was in a relationship with a non-lifeguard. My mentor asked if I would cheat on my boyfriend with him. He was in his 30s or 40s...I made it obvious that I wasn't interested. He said he felt like I was flirting with him because I would go on buoy swims or go in the lifeguard truck patrols with him. I told him it was my job to be in shape and patrol the beach. Bouy swims are a regular workout we're supposed to do, and it's always safer to patrol with a two people." Witness 8 refused to give the mentor's name because she was afraid of retaliation but stated that he is still currently employed in the Lifeguard Division.

Witness 4 stated that [redacted] "spread a rumor that I was having sex with [redacted] then [redacted] changed it to [redacted] was having sex with [redacted] I shut it down and...[told [redacted] spreading rumors that they were out together and having sex was sexual harassment." Witness 4 added that later on "when I was working with [redacted] at [redacted] I ended up working on special projects. I was [redacted] go-to-girl. Those rumors went around that we were sleeping together. [redacted] never hit on me. There was none of that. The rumors were going on for about a year." Witness 4 also said, "When I was a [redacted] asked to walk me to my car. I said no repeatedly. [redacted] said, 'I want to lick your pussy so bad.' *(Another employee's wife, but interviewer didn't catch the name)* grabbed [redacted] and I ran to my car to get away from [redacted] The next year [redacted] got lifeguard of the year. [redacted] made me so scared and so frightened to be at work."

Witness 6 stated, "There is one specific job called the TR guard. On [redacted] the TR guard goes on a bike. It is an abbreviation is tower relief. You go to each tower and give a break to each guard...I was told to be careful not to be a TR guard. It was a euphemism to describe one of the women in the service that had been dating several men. They called her a TR bike... They told me not to be hooking up with too many men or that would be my nickname. It escalated; at one point there was one whole station of all the men she had hooked up with. They would joke that they had only one thing in common. To be a woman, you have to be cool to put up with the jokes but not cool enough that you've dated too many of them."

A majority of witnesses stated that it is common for lifeguards to end their shifts and go drinking together at nearby bars. During the course of this investigation, many allegations of sexual assault or harassment began that way[7]. Witness 12 stated that she has been "groped" by a male coworker after work at a bar and had seen other women being "groped" too.

Witnesses also stated that giving in to a relationship with an older or more experienced lifeguard was advantageous. Witness 11 stated, "If you were in a relationship, you were in with the in-crowd and you were included more." Witness 17 stated that her [redacted] made sexual advances to her at work, which progressed into a consensual relationship. She stated that she received advantages because of this relationship including being included more by

[redacted]

[7] All allegations of sexual harassment or assault, where the complainant provided the subject's name, are currently being investigated by EEIO.

other men and [redacted]. She also recalled other relationships between male supervisors and female subordinates that led to advantages for those women.

Additionally, many witnesses discussed that lifeguards do not take the City's sexual harassment training seriously. Many stated that it is an unreasonable expectation for a lifeguard to be on a computer for two consecutive hours when they are on duty, especially considering that many lifeguard stations do not have computers. Many suggested that they be scheduled to take the training outside of their normal work hours so they could focus on the content of the training and not be distracted by the demands of their job. Witness 12 said that it is common for a lifeguard to start the training and be needed for a rescue call; when that happens, they ask someone else to keep pushing the buttons while they handle the rescue call. She also said that if a lifeguard is on light duty, they will be asked to complete the sexual harassment training for other full-duty lifeguards. Multiple witnesses stated that they have also seen male coworkers post their sexual harassment training certificates in common areas and on refrigerators. While some thought it was a joke about how little they cared about the sexual harassment training or how difficult it was to take given their working conditions, others felt it was a form of sexual harassment. Witness 1 wrote, "It's common practice for the men to print their certificates out, tape them to the walls of the main towers with their names on them, and joke about being '100% certified to sexually harass.'" Witness 15 wrote, "…when we had to do training videos around sexual harassment it was a joke amongst the men and there were portions about respecting trans people and queer people in general and I remember jokes being made at work about this. I have a distinct memory of my mentor for multiple years who was kind to me, then, talking to other men in the lunchroom in the tower about how weird he found trans people and how he didn't think they should exist."

Allegation #9: Witnesses alleged that female [redacted] and those in higher positions perpetuate and normalize the harassment based on sex.
Witness 1 wrote, "We have these female permanents who have internalized the language and culture of men, that they can't support women or they punish women." Five witnesses also expressed that they felt female permanent staff perpetuated and normalized the negative treatment [redacted] received based on gender. Witness 10 said, "I would be frustrated because women in leadership were being particularly harsh to women because they felt that because they had to deal with this bullshit, you should have to deal with the bullshit too." Witness 17 recalled, "If you had anything to say about mistreatment, you were overly sensitive [redacted]." She noted that some women were supportive, but there "was this attitude that we dealt with it to get where we are, so you can deal with it too. It's like men see us as weaker and sensitive, so don't reinforce that." Witness 17 also stated, "…the female supervisors aren't the most welcoming and supportive. I get that they've been through a lot to get where they are. It creates an environment where they are so hardened by the gender crap. They have gone through so much to get there that they aren't as welcoming as they should be. It's a boys' club. You have to be one of the boys to fit in, to feel like you are one of them." Witness 1 wrote, "Since success in this sphere is often dependent on male validation, a lot of women tend to view other women as competition, and hold other women to much higher standards than our male counterparts."

Witness 5, [redacted] stated, "I think in this job, it's all men. If you can't hang with working with all men, then, well it's not like you can't work here, but there are things you can do to survive… You have to carry yourself professionally. You can't be crying on the beach. The guys don't know how to handle that."

Allegation #10: Witnesses reported that their supervisors treated them more negatively than male coworkers.

The majority of witnesses also stated that they were treated more negatively by their supervisors because of their gender. Witness 10 recalled, "I had some supervisors who just did not want to talk to me unless they absolutely had to. They were quick to take guys on patrol, but it wasn't until there were no other options, they had to have another person in the truck before they would take a woman." Witness 9 stated that she noticed a "lack of respect" from her supervisors. She stated, "My [redacted] would completely disregard anything I brought to them. It's something that should be dealt with at their level, and I would get blown off every single time. It became really frustrating. Every time I was disregarded by them, it came back as a bigger issue, and I thought you should have listened to me in the first place." Witness 4 stated, "[redacted] He would not look me in the eye and would not greet me. If there were men present, he would look at them, and his eyes would skip over my head. [redacted] It felt like I also had to sleep with him in order to get him to acknowledge me."

Witness 8 stated that her first [redacted] the male, more senior [redacted] consistently left her alone to complete the tower watch for up to three hours at a time, when policy states it should be one hour and thirty minutes or up to two hours with sergeant approval. She stated that he would go surfing during that time and her [redacted] knew it was happening. Witness 8 said that when she protested, "the guard would say that it's seniority." Witness 8 also recalled that even though he left her alone on tower watch for three hours a time, he would also tell her that "...he didn't trust me watching the water or making a rescue. I felt like it was because I was a woman...he said multiple times that he didn't trust me or have any respect for me. I had never worked with him before. It was because I was a woman." Witness 8 refused to provide the [redacted] name out of fear of retaliation but confirmed he is still employed in the Lifeguard Division. Another witness also recalled that this happened to Witness 8 [redacted]

Witness 12 stated, "I remember my [redacted] coming up and asking me if I had had a bad experience with a particular lifeguard. I said no, I had not had an issue. In my mind it didn't minimalize this other woman's experience. I said it didn't surprise me though because he is very immature. The [redacted] tried to make me into a victim for 45 minutes to an hour. I kept watching the clock. He kept saying you should feel comfortable telling me, are you SURE you didn't have a bad experience, you're a woman, are you sure? He wasn't understanding that I either didn't want to report it to him, or I didn't have a bad experience. He just kept pressuring me and going on and on. I was supposed to be watching the water during this conversation, and he wouldn't stop... That [redacted] just kept saying, 'Are you sure you haven't had a bad experience? You're a woman, are you sure?' That made me so uncomfortable."

Witness 6 stated, "I was working [redacted] I was on the A.T.V. to conduct a rescue. You hop on in your bathing suit. I went out for a rescue, everything was all good. Something happened where the A.T.V. was not functioning properly," so she was told to take it to the [redacted] and someone would help her. She said that the A.T.V. died before she could get to the [redacted] and [redacted] saw her and said, "Hop in the truck, I'll give you a ride." Witness 6 said, "I was still wet and in my bikini. I got in even though I thought I wasn't

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[redacted]

supposed to be in the truck with him because of COVID. He said he needed to talk to me, that [redacted] saw you in your bikini driving around for a while. You need to make sure you are in your uniform.' [redacted] He asked me out to donuts on our drive to my tower. I laughed it off, but then I wrote a full-blown report about it and sent it to my [redacted] said, 'I read your report. Do you want to start wearing a one piece from now on?' He didn't want to address the fact that this lifeguard hit on me. Nothing came of it. I had been warned many times to be wary of [redacted]

Two witnesses also brought forward complaints about [redacted] Witness 17 said [redacted] "is sexist, treats women horribly, and everyone knows it." Witness 17 stated that in her [redacted] year she worked with [redacted] at the time. She said, "He was such an asshole to me. Not the boys, just to me. I almost quit because of him. He was very sexist; he made no moves to hide it." Witness 17 also stated that upon [redacted] request, she was called and asked to apply for [redacted] because "they needed a girl." She said, "They weren't calling me because they think I'm good at my job, it was just because I'm a woman who doesn't cause them problems." She recalled that on one of her first days in the role, the team was discussing the recent academy class and that there were two women named as honor guards. She recalled, "[redacted] said, 'It just shows you how soft the academy is getting.' My face just fell. Another guard said, 'Or it shows you how badass those women were,' and [redacted] just shook his head, and everyone laughed." She said that [redacted] "didn't like a lot of the [redacted] but they all seemed to be women." She also said, "I cried every single day because of him" and made multiple complaints about him, but people would just say that is how he is. [redacted]

Allegation #11: Witnesses alleged there were policies or practices based on gender.
Witness 18 explained, "…we have a lifeguard relay that occurs every year. Each district will have their own tryout to see who is the fastest for their team. On every team, there needs to be at least 2 women per team. There was one year where [redacted] specifically did the try out, and the top scoring in swimming were all women, but the leadership of the team said they could only have a maximum of two women, so they cut the women who came in 3rd and 4th and gave those positions to men."

Witness 12 shared that her first year, "A couple of weeks into the summer, a lifeguard was uncomfortable opening or closing by themself. I think it was that a homeless person was taking pictures of the guard while they were changing in their car, which is what you have to do at the [redacted] I don't remember how far up the chain of command the policy went, but the policy was that a woman couldn't open or close a station by themselves, but a man could. I worked [redacted] three days a week. One person is there 10 to 7, and one person is 11 to 8, so you're alone for 1 hour on each shift. Two of my days I worked with one other man, and they would extend his shift by an hour to open or close with me. There was one day when I was with a female, and instead of extending both of our hours so we could be there together, they would send a male permanent lifeguard from [redacted] to sit with us for an hour… It was uncomfortable and the guys hated it… The guys didn't want to work 9 hours just to be with me, and I wasn't getting any overtime, but this man is… It made me feel incompetent."

Allegation #12: Witnesses alleged that training is provided based on sex or quid pro quo sexual harassment.

The Lifeguard Division Policy 7.3: Lifeguard I Training Continuum defines a skill set as "closely related information, observation and manipulative skills identified under one heading and listed on a specific Field Training Guide (in some cases, including additional criteria for certification). For the purposes of this policy, individual skill sets are identified as Bay Field Training, Seasonal Tower Field Training, All Terrain Vehicle (ATV) Operation, Vehicle Operation, Personal Water Craft (PWC) Crew[11], PWC Operation, and Main Tower Observation." In order for a lifeguard 1 to promote to a lifeguard 2, they must complete all of the Field Training Guides (FTG) for these skills.

Policy 7.3 also states, "It is the responsibility of district sergeants to administer seasonal staff in-service field training within their district. In addition, district sergeants will meet regularly with their full-time staff to review the progress of in-service training for Lifeguard 1s. District sergeants will work with their full-time staff to provide consistency and direction to the in-service training…Training officers for the skills sets listed below in this policy, with the exception of PWC Crew and Operator, are typically Lifeguard II and Lifeguard IIIs. In some situations, certain Lifeguard 1 designated by district sergeants may be considered training officers…Training officers are expected to engage in in-service training whenever reasonable, practical, and public safety allows conforming to the guidelines set forth in this policy. The employee is responsible for requesting training regularly and consistently." The policy goes on to state that training resources may be limited, and when necessary, training for lifeguard 1s is prioritized by, "1. The operational needs of the Lifeguard Division, 2. Crowds and conditions, 3. The availability of equipment or access to a specific main tower…, 3. The seniority of each Lifeguard 1." The seniority is established by the lifeguard 1s actual hire date, how well they ranked in the Lifeguard Academy, and the number of hours they've worked.

However, the majority of witnesses shared that it is extremely difficult to get training unless you are a man, an attractive woman, or in a relationship with a more senior employee. Witness 1 wrote, "The more senior LG1's with main tower and other certifications are often responsible for the training of new guards. These guards are established and trusted by LG2's and/or Sgts through years of service, or because they grew up with them…But I do think it can also make (often) younger and female guards more vulnerable, or feel like they must tolerate certain behavior and rhetoric in the workplace. When your career progression is predicated on training, and your training opportunities are so often dependent on being well liked or accepted within the norms of the service…" Witness 2 explained that her male coworkers wouldn't help her get skills checked off, but she noticed the men around her were not having those same difficulties. Witness 2 said this continued to put her at a greater disadvantage throughout the course of her career because the more skills a lifeguard 1 has checked off, the more opportunity they have to demonstrate and perfect those skills which leads to better work locations and promotional opportunities. Witness 15 wrote, "The way that training is given as a Lifeguard 1 is based on who you know and how much they and their friends (often older men) like you & trust you as a lifeguard. This trust is built by befriending them, going to the bars with them after work, and for being 'chill' enough in the face of their behavior to not be 'marked' as an angry, disruptive woman." Witness 6 stated, "…skills getting checked off and training is a nightmare. I think it was because I wasn't liked that people refused to train me. [redacted] got training before me even though she took a year off. But she was a cool, [redacted]

[redacted]

surfer girl. If you're a chill girl, you're in." Witness 12 added, "Skills aren't being adequately assessed for all people, so it results in the bro system."

Witness 12 also stated, "It felt like I was being overlooked for training opportunities. Every other person I was competing with was a guy… But they were also just buddy buddy and just bros, so they were getting prioritized because they were buddies. Because they had some homey bond, I wasn't given the opportunity. I was really upset… getting ski training, you have to be homeys with someone because a person has to change their schedule around to go out with you. I found a really hard time getting someone to go out with me, and I saw men who were a year behind me going out with their bros." Witness 9 stated, "Men want to train their buddies and will make plans to do it ahead of time so when a woman they are working with asks for training, they will say no because they already have plans to train their buddies, especially on the ski." Witness 10 said, "I did feel like I got passed up for training opportunities. There were men who had been with the service for fewer years who got more opportunities than me. It's supposed to be merit-based training, and I'd have to tell myself maybe I wasn't performing as well as they are, but it was definitely something I thought about, that they were getting training faster than me because I'm a lady." Witness 10 added, "It took years of asking to get my ski training and to get my main tower training. It took until my [redacted] to get that checked off. I have seen so many men get that training in a fraction of the time. While I was working in [redacted] I wanted my observation training. I asked multiple times, and it was denied. Then there was a panic [redacted] because no one was available to fill the…vacancies, and they said no one was trained. I said I've been asking for years for the training. They said, 'Do you still want it?' and I said of course. I got it in [redacted] while men were getting it in year 4." Witness 17 also stated that she had difficulty getting training and getting her skills checked off on ski. She said, "I had to go outside of work to get the training. The boys were getting taken out to scuba dive and for boat rides with the [redacted] but I was not." She also recalled that when she worked on [redacted] all of her male colleagues had their ski skills checked off, but she didn't. Witness 4 stated, "They are all buds, they didn't want to train me or include me or invite me to anything…Because they weren't my friend, they wouldn't help me train, they wouldn't take me on patrols so I could learn and grow. They are only helping each other. I grew out of the phase where they wanted to have sex with me, but you don't grow out of being a woman and therefore being left out."

Witnesses also stated that they received negative treatment from people specifically identified to provide them with training. Witness 15 wrote, "I did not have a relationship with my assigned training supervisor. This person was often too busy for me and his friends would ignore me when I would ask for training. He was generally reluctant and reserved when he did oblige to training me on a few occasions. And I know, from witnessing how training functioned between those who were closer in relationship with these men, that certain people were trained with much more ease, quickness, and support than me and some of my other non-men peers were…But it was very clear that the men in power in this regard trained their friends and lifeguards they liked, hung out with, and women who they got along with. Because I was not really in their 'circle' I would have to beg for training during my breaks, run around the tower trying to find someone else to train me after being ignored, and it was demoralizing and exhausting." Witness 17 said, [redacted] would take her male coworker "out on the boat for rides all the time," and he never took her.

[redacted]

Witness 4 stated, "When I worked at [redacted] there was a [redacted] woman getting tested on the ski. I was out on the water and saw the group of guards looking pissed. [redacted] was surfing while someone else was testing the girl. [redacted] was testing her, and [redacted] was not an FTO[14]. [redacted] would tell [redacted] what to do and then [redacted] would do it. [redacted] is being paid to be an FTO, but [redacted] was making [redacted] do it. I took video and sent it to [redacted] then did the test right in front of my tower. [redacted] wasn't on the ski with her and didn't adequately train her…No one trains the women. They only do that when they have to. [redacted] trained her because she was beautiful. [redacted] has never trained any other women." Witness 4 added that in general men do not support women with getting their skills checked off. She said, "If you're not one of the boys, they are keeping you from being trained."

A few witnesses also shared that that training was provided more frequently to women in relationships with older male employes. Witness 14 stated, "I would say most of the examples are a younger seasonal with an older lifeguard 1 or lifeguard 2 and receiving more training or them training together which made people uncomfortable or getting more tower visits. When people are together or dating or flirting, you can tell, and it makes people uncomfortable."

[redacted] and provided the FTGs applicable to lifeguard 1s. [redacted] stated that for each item in the FTG, the lifeguard 1 receives instruction and demonstration, then they demonstrate proficiency in the skill, then they accept responsibility for knowing that skill, which is all noted in the columns of the FTG. [redacted] said, "It's not black or white of exactly who can sign off on each column [of the FTG]." [redacted] stated that on some FTGs, like rescue board operations, a lifeguard 1 can provide instruction and demonstration and check off that they have demonstrated proficiency. [redacted] added that district sergeants must provide final approval by signing the FTGs, but [redacted] stated that sergeants are not required to observe the skill themselves and many just sign off on the completed FTGs.

[redacted] stated that lifeguard 1s have a Point of Contact group that meets once a year so they know who can provide training for the skills, but [redacted] said that did not exist and that lifeguard 1s would ask their chain of command to find out who could provide training. [redacted] also stated that there is a process to monitor training to ensure everyone is moving forward without regard to their gender. [redacted] added that the only reason a person would not be progressing in their training is if they had been unsuccessful in demonstrating those skills or if they weren't "motivated" enough. [redacted] said that lifeguard 1s are assigned mentor groups, and those mentors periodically check in to see if their assigned lifeguard 1s are making progress or encountering any difficulty with training. [redacted] also said that individual work locations manage employee progression through the skill sets, and the training section gathers and uploads certifications. [redacted] said that to [redacted] knowledge no one monitors the skill progressions of all employees collectively, and no one monitors the training progression to ensure that lifeguards are being trained without regard for their gender. [redacted] added that no one has ever reported to [redacted] that they felt men had greater or easier access to training than women or that women received less training opportunities than men.

Allegation #13: [redacted] treats women more negatively than men in [redacted] testing. [redacted] stated that she wanted to become a [redacted] because she is "a small girl," which can make [redacted] harder to operate. She felt that if she

[redacted]

[14] Field Training Officer

were a trainer, she could help "smaller" women learn the techniques she'd acquired over time. She also said that she wanted to help people she could see were not getting enough training. [redacted] said that [redacted] was the only person who provided the [redacted] test. She felt that because of her gender, [redacted] gave her harder questions during the practical test and second guessed her answers, which made her nervous and perform badly. [redacted]

[redacted] denied the allegation that [redacted] gives women harder questions on the [redacted] practical test. [redacted] said that [redacted] uses the skills outlined in the FTG to guide [redacted] questions and then asks follow-up questions if the person's answer isn't "quite on track." [redacted] said that [redacted] does not have a standard set of questions and comes up with them in the moment. [redacted] does not write down the questions [redacted] asks or create a scoring document, so [redacted] could not provide evidence to show if [redacted] asks harder questions to women or if women were scored differently than men. [redacted] also did not have any documentation on the questions [redacted] asked [redacted] or why she failed. [redacted] could only recall that [redacted] because "it was clear relatively early on that there was a either a lack of knowledge or an ability to teach."

[redacted]

[redacted]

Conclusion
The Equal Employment Opportunity (EEO) Policy – Annual Statement dated October 13, 2025, states, "Harassment includes unwelcome, unsolicited, or unwanted conduct because of a protected classification that is offensive, demeaning, derogatory, humiliating, embarrassing, intimidating, or otherwise causes a person distress. Harassment creates a negative work atmosphere, which reduces work productivity and morale, undermines the integrity of the workplace, and destroys professionalism. Harassment can also create a hostile, offensive, oppressive, or intimidating work environment…This occurs when the harassing conduct sufficiently offends, humiliates, distresses, or intrudes upon a person's ability to perform the

job as usual, or otherwise interfere with and undermine the person's personal sense of well-being. Some examples of harassment include derogatory comments, slurs, demeaning jokes, threats, unwanted touching...or sexual advances. Additionally, harassment can include conduct that occurs in a work-related context outside of work (e.g. an off-site party)...or in a non-work-related context or on social media if it affects the workplace...Sexual harassment is a form of discrimination based on sex, gender, gender identity, gender expression, or sexual orientation...a person alleging sexual harassment is not required to have sustained a loss of tangible job benefits or productivity in order to establish harassment. It suffices that a reasonable person subjected to the conduct would find, as the harassed person did, that the harassment so altered their working conditions as to make it more difficult to do their job." The EEIO found evidence to support systemic and systematic violations of the EEO Policy in the Lifeguard Division, specifically in how women are treated by their coworkers and supervisors.

[redacted]

Additionally, [redacted] stated that [redacted] is not using standardized questions for the [redacted] practical test and not documenting participant scores. This testing process should be reviewed by the Fire-Rescue Department and the Personnel Department to ensure a fair and unbiased testing process. [redacted]

EEIO also suggests that the Fire-Rescue Department review how the City's sexual harassment training is implemented in the Lifeguard Division. Many witnesses stated that it is an unreasonable expectation for a lifeguard to be on a computer for two consecutive hours when they are on duty, especially considering that many lifeguard stations do not have computers. Multiple witnesses stated that they have seen male coworkers post their sexual harassment training certificates in common areas and on refrigerators. While some thought it was a joke about how little they cared about the sexual harassment training or how difficult it was to take

[redacted]

given their working conditions, others felt it was a form of sexual harassment.

[redacted]

If you have questions, please feel free to contact me at (619) 687-5974.

Sincerely,

Erin Houston

Erin Houston
Equal Employment Investigations Manager

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