

Gendered Harassment in the U.S. Forest Service

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Abstract: This case study examines the history and current state of gendered harassment in the U.S. Forest Service (USFS). Starting with the Bernardi Consent Decree in 1979 and the Donnelly Consent Decree two decades later, the USFS aimed to make its work environment more hospitable to women and other minority employee groups. However, the service has largely failed at this aim, and female employees are routinely harassed and abused, often staying silent for fear of retaliation from male coworkers or supervisors. After exploring the history of these attacks and the present working conditions for minority employees of the USFS, this case examines possible solutions, including legal intervention and cultural shifts. The problems faced by the USFS are not unique to the forestry industry. As sexual assault and harassment gain more media prominence and allegations lead to huge public relations issues for industries across the board, these issues are on the forefront of cultural dialogue. By examining varied cases of gendered discrimination, conclusions can be drawn about what does and doesn't work in the fight against sexual misconduct.

Fighting Flames and Harassment

Elisa Lopez-Crowder is a Navy veteran and seasoned wildland firefighter. She was hired by the U.S. Forest Service (USFS) to fight flames in California's Eldorado National Forest in 2010. Her job was to run 45-pound sections of hose into the forest and clear live trees to create fuel breaks. A few months into her tenure, she was approached by the crew's male assistant director while she was clearing brush. He hoisted her by her line gear and threw her to the ground while holding her down with his foot. A male coworker intervened and reported the story to a supervisor, corroborating Lopez-Crowder's story. The USFS agreed to investigate the situation, but while the inquiry was underway, Lopez-Crowder was assigned once again to work at the same site as her harasser. About a year later, she travelled to Washington, D.C. with other female employees of the USFS to bring concerns of gendered harassment to agency heads. Tom Vilsack, then the Secretary of the U.S. Department of Agriculture (USDA), the parent agency of the USFS, apologized to Lopez-Crowder and assured her that her harasser had been fired (Joyce 2016). Upon returning to work, Lopez-Crowder found out that her harasser was still on the USFS payroll, and quickly transferred out of the firefighting division, fearing that she had become a target. "In the years I served in the military," she said, "I never encountered such discrimination and harassment as I have working for the U.S. Forest Service" (Joyce 2016).

Since its creation in 1905, the USFS has struggled to effectively integrate women into its ranks. Once women could hold field positions in the mid-twentieth century, there were immediate clashes between male and female coworkers regarding sexual harassment and assault (Kaufman 2006). This pattern continues today throughout the country, with one employee testifying to Congress that nearly every female firefighter in the service has experienced harassment.

Department heads, both regionally and nationally, have proved unable to effectively mediate these issues (U.S. House Donnelly Testimony 2016). Pressing charges against assaulters is a long and arduous process for female employees, and often results in being blacklisted within the service. Meanwhile, women are leaving the USFS in droves due to fear of attack and retaliation (Joyce 2016). What is to be done? Can change be enacted regionally within the service, or is this a larger systemic issue? Does responsibility fall to national agency heads or individual employees? How involved must women be in the process to curb the culture of harassment? How should agencies address this issue and where do they start?

Though recognized nationally, this problem is particularly severe in Region 5 of the USFS, the Pacific Southwest Region. This case will examine documented instances of harassment, specifically in Region 5.

Historic Inequality in the USFS

The USFS was created by President Theodore Roosevelt to administer the nation's forests and grasslands. Today, the agency oversees 193 million acres, accounting for 25 percent of federal lands. Women have worked for the Forest Service since its inception, though only recently as paid, equal employees (Weaver 2016). Throughout the 1900s, women played a key role in developing and promoting the USFS, though they frequently struggled against the masculine culture valued in the forestry world (Kaufman 2006). In the early twentieth century, women were only occasionally allowed to work in the service, and those that did were pushed into clerical positions (Hanshew 2014). Albert Cousins, an early employee of the USFS, recalled that the service preferred to hire men, even for clerical work, because "a woman [could] not handle the rough work required in the administration of a forest, such as assembling and shipping fire tools [and] rustling firefighters" (Hanshew 2014).

Despite this masculine perception of the industry, the USFS allowed women to hold technical drawing, data collection and analysis positions beginning in the 1910s. One important field position that women held was "fire lookout." These women sat in towers throughout parks and looked for fires, calling on male wildfire fighters to chase any flames they saw. Due to necessity, rangers' wives were also often allowed in the field. Wives performed clerical work, cooked, cleaned, and occasionally fought fires in desperate situations, though they were not paid for any of this work (Weaver 2016).

During the Second World War, labor shortages forced the USFS to employ women in the field. They worked as firefighters, helped on fire lines, drove trucks to the line, and cleared potential wildfire fuel. After men returned from the war, women were stripped of their positions and the USFS once again began restricting its employment of women (Kaufman 2006). An official leaflet from the 1950s explained: "The field work of the Forest Service is strictly a man's job because of the arduous nature of the work, and the work environment" (Hanshew 2014). As the women's liberation movement of the 1960s gained steam, women began to challenge the long-held discriminatory practices of the USFS (Hanshew 2014).

In 1971, the *New York Times* proclaimed, "Women have invaded another traditionally all-male stronghold—the domain of the professional forest-fire fighter" (Hanshew 2014). They noted that the USFS had formed an all-female fire crew in Lolo, Montana. The officer who trained the crew of women shared that they were "green, but their enthusiasm and determination will help them develop into a tough unit" (Hanshew 2014). This first women's crew helped catalyze the addition of women into the service (Hanshew 2014).

By the late 1970s women were being integrated into all-male crews. In the field, these women encountered harassment and discrimination by their male colleagues. One female firefighter working in the 1980s described a sexual harassment class given to the new crews as part of a USFS orientation.

They [said] ‘Well, fellas, things are changing. Now when you have to take a pee, you have to go behind the bushes. [...] And you have to watch out for sexual harassment because you could easily get sued.’ [...] And people were just scared of us. Nobody would talk to us. [...] They thought, any second, that we were going to sue them.’ (Hanshew 2014).

Regardless of pushback from male employees, this move up the industry ladder into field work eventually allowed women to gain leadership within the agency in the 1980s (Hanshew 2014).

Paving the Way for Equality: *Bernardi v. Yeutter*

Though women have been legally equal employees in the eyes of the USFS for over 30 years, gendered discrimination and harassment are still prevalent throughout the service (U.S. House Donnelly Testimony 2016). In 1973, Gene Bernardi, a female employee of the USFS, sued on behalf of herself and other female employees. She claimed that the USFS had discriminated in making hiring and promotion decisions. The parties entered into the Bernardi Consent Decree (a voluntary settlement without admission of guilt) in 1979, which was to remain in effect until 1986 (*Bernardi v. Yeutter* 1990). The consent decree called for the integration of women into “hiring, training, and promotions in non-traditional positions,” such as the hard sciences, firefighting, and law enforcement (*Bernardi v. Yeutter* 1990). Specifically, the USDA, was forced to match the gender profile of California’s civilian workforce by employing 43 percent women, including in leadership positions. New female hires and promotions flooded previously male-dominated fields (Langlois 2014). Although on paper the Bernardi Decree increased the numbers of women in these positions, management held the opinion that unqualified women were taking qualified men’s jobs, and backlash against women hired into these positions was rampant. It quickly became the norm among male workers to believe that unqualified women were hired only to satisfy diversity requirements (U.S. House Donnelly Testimony 2016). Bequi Livingston, a former wildland fire fighter and the current fire operations health and safety specialist for the Region 5, called the years that the decree was in place a “horrid and deplorable” time (Langlois 2014). She said qualified men were denied promotions they deserved, while unqualified women were thrust into new positions they weren’t prepared for that set them up for failure. “Men were pissed, and women were pissed,” she said. “The intention was good, but the execution was bad” (Langlois 2014).

Because of the overall negative response from men in the USFS, in 1986, the female employees’ class filed a motion for contempt of court, in which they claimed that the USFS had not complied with the original consent decree. They women felt they were still not being treated fairly and experienced extreme backlash from their coworkers and superiors. The district court decided with the women and ordered the decree to remain in effect until 1991 (*Bernardi v. Yeutter* 1990). In 1990, a group of male employees in Region 5 moved to intervene in the female employees’ Title VII action. They claimed that the consent decree was negatively and unfairly impacting their employment and promotion opportunities. The district court denied their motion, holding that it was untimely, and should have been filed immediately when the consent decree was approved, instead of years later (*Bernardi v. Yeutter* 1990). Soon after, male employees brought a separate action against the USFS, challenging the terms of the consent decree. The district court

dismissed that action. The male employees petitioned for a writ of certiorari, which orders a lower court to deliver its record in a case so that the higher court may review it. The United States Supreme Court denied the petition. In 1992, the parties again agreed to a new settlement, to expire in 1994 (*Bernardi v. Yeutter* 1990).

Another Push Forward: Donnelly v. Glickman

In 1994, just 6 months before the Bernardi Consent Decree was set to expire, Lesa Donnelly and her colleague Ginelle O'Connor brought an individual and class action lawsuit on behalf of 6,000 Forest Service women in California (*Donnelly v. Glickman* 1998). Donnelly worked for the California USFS in various positions for over 20 years and had seen the deleterious effects of gendered discrimination in the service first hand. A California native and self-proclaimed "peace and justice activist," Donnelly is a lifelong outspoken government employee (Donnelly 2017). One reporter describes Donnelly's demeanor as that of a "friendly bulldog" (Burkhart 2012). Nearly every year for the last 15 years, she has traveled to Washington, D.C., to lobby the USDA, Congress, and the White House to protect women in the USFS (Joyce 2016). During her 24-year tenure with the USFS, Donnelly says she was sexually harassed multiple times (Burkhart 2012). When she was out in the field, one of her male coworkers said that he had a bet with the crew "to see what color [her] underwear" was (Vesely 2002). For her, the final straw was being called a "bitch" by her supervisor (Vesely 2002). Donnelly retired from the service in 2002 under a settlement agreement, and now works as a paralegal. She and her brother founded Donnelly and Donnelly Alternative Dispute Resolutions and represent federal employees. Since 1998, Donnelly has been Vice President of the USDA Coalition of Minority Employees (CME) and the Women's Issues advisor to two Coalition Presidents (U.S. House Donnelly Testimony 2016).

In their lawsuit, Donnelly and O'Connor claimed that the USFS had subjected them and other female employees to gender-based discrimination in violation of Title VII of the 1964 Civil Rights Act. The Donnelly case followed the footsteps of the original Bernardi Consent Decree. The suit included a remedial request for affirmative action in hiring, work assignments, and promotions. In particular, plaintiffs sought an injunction requiring defendants to abolish sex discrimination, sexual harassment, a hostile work environment for women, and reprisal against women hired under the Bernardi Consent Decree or who have complained of sex discrimination by means of an affirmative action. History repeated itself and, again in 1997, four male employees moved to intervene on behalf of themselves and all other employees not within the plaintiff class. They argued that they were asserting their own affirmative claims of gender-based discrimination and that any remedy that plaintiffs might obtain could affect them. However, the district court denied the motions to intervene. The plaintiffs requested that the defendants be ordered to take specific actions to remedy the hostile nature of the work environment, including:

- (1) dedicating significant funding and staff to implement all changes resulting from the parties' legal settlement within two years;
- (2) removing or demoting all managers in Region 5 who have violated the agency's policies and failed to meet their legal responsibility to promptly investigate harassment;
- (3) establishing compliance with Equal Employment Opportunity (EEO) guidelines as a critical element of manager performance standards;
- (4) creating a process for the prompt investigation of harassment and reprisal complaints separate from the agency's EEO process;
- (5) training all employees on EEO issues;

- (6) eliminating the backlog of current EEO cases alleging discrimination, harassment, and reprisal against women (*Donnelly v. Glickman* 1998).

In direct response to the Donnelly case, the Federal Court approved a second consent decree in 2000. This provided relief and individual settlements to plaintiffs (Vesely 2002). Working conditions improved during court oversight, partially because Donnelly was appointed by the court as a monitor for the “Donnelly Settlement Agreement,” and supervised the implementation of the six terms outlined above. However, the consent decree ended in 2006 and was not renewed. By 2008, Donnelly again started contacting agency heads to report instances of job discrimination, physical and sexual assaults, and reprisal. All agencies were non-responsive (U.S. House Donnelly Testimony 2016).

A History of Harassment

Although the consent decree sought to eliminate them, claims of gender-based harassment, discrimination, and abuse in Region 5 are not rare. In 2000, a young female firefighter working in the Shasta-Trinity National Forest was shot at with BB guns, called profane names, thrown into water to have “a wet T-shirt contest,” and told she was only hired because of the Bernardi “cuntsent” decree by her male colleagues (Vesely 2002). When she reported these incidents, she was disciplined for spreading rumors. She quit (U.S. House Donnelly Testimony 2016).

In 2002, an archaeologist reported sexual harassment in the Los Padres National Forest. She presented photographs of Los Padres Hotshot crew carriers with photos of naked women covering the walls. She and her son received death threats and she was forced to move to Region 6. Even so, her reputation preceded her, and she was ultimately accused of falsifying archaeological sites. She no longer works for the USFS (Vesely 2002).

In 2008, a female employee was assaulted by a male coworker on the steps of the Region 5 District Office. He split her lip, gave her a black eye, and knocked out her teeth. He then destroyed her cell phone so she could not call for help. The Forest Supervisor made a deal with the District Attorney that he would not prosecute her attacker until he was eligible for retirement (U.S. House Donnelly Testimony 2016).

In 2011, a female Engine Captain in the Sequoia National Forest filed a government complaint for being denied training, assignments, and promotions based on gender and race. She reported that her all male crew refused to follow her directions, undermined her authority, and yelled at her. She feared physical harm from her assistant. Her reports to the District Ranger and Forest Supervisor went unaddressed. In her report, she revealed that almost every female firefighter in the Sequoia National Forest has been discriminated against and harassed by repeat offenders (Joyce 2016).

Most investigations that are completed by the USFS are turned against the victim, with few instances of accountability for the attacker. Despite compelling evidence of ongoing discrimination and harassment, the USFS has been unable to effectively address these issues. Though the organization repeatedly reports that there is zero tolerance for sexual harassment and workplace violence this appears to be merely lip service, as the USFS continues to ignore violations (U.S. House Donnelly Testimony 2016).

However, not all female employees feel negatively about the culture in the USFS. Throughout Region 5, there are female firefighters (the field in which most harassment takes place) who acknowledge that while the culture can certainly feel male-dominated at times, the camaraderie of fighting flames can surpass gender differences (Langlois 2014). One woman who

spoke to a *High Country* reporter anonymously in 2014 shared that, “For the most part, men were great when I was on the line. There were men who thought we shouldn't be there, and who wouldn't listen to my orders, but listened to men who gave them, and we always felt pressure to succeed, but I never experienced threats or sexual assault. And I never heard of anyone who did.” Clearly, the experiences of women in the field are extremely varied. Some female employees feel put off and separated from their largely male crews when the consent decree and issues of gender equality are brought up (Langlois 2014).

Organizational Response

The response to these complaints has been inadequate at the local, regional, and national levels. In Region 5, the Albuquerque Service Center (ASC) handles human resource issues for the entire region. ASC duties include training, discipline, and termination of employees. There are numerous complaints of sexual harassment and blacklisting of victims at the ASC. This is particularly disturbing because the ASC is responsible for personnel and EEO complaints, but they have as big a problem with civil rights violations as the employees they give guidance to. The ASC's director, Marybeth Lepore, lives in Alaska and works remotely. She is completely disengaged from the day-to-day operations of the organization and has been reported to misspend taxpayer money. In one instance, Lepore flew the almost completely male HR management team to Alaska for an all-expenses paid “retreat” with taxpayer money (U.S. House Donnelly Testimony 2016). The entire service is struggling to find places to cut the budget while still performing its essential duties. Lepore's trip, and frequent agency-funded travel to and from Alaska, has wasted hundreds of thousands of taxpayer dollars and makes it ever more difficult to find resources to address EEO complaints (U.S. House Donnelly Testimony 2016).

These issues also plague the national USFS agency. In September 2014, articles ran in the *New York Times* and *High Country News*, reporting on rampant sexual harassment and assault perpetrated against female firefighters in the service. Thomas Tidwell, former Chief of the USFS, sent out an “All Employee” email after the stories ran, defending himself and the organization (U.S. House Donnelly Testimony 2016). He wrote, “Foremost, focus was placed on investments targeted to increase our capacity, competencies, and expertise in our Employee Relations and Equal Employment Opportunity programs and also equipping leaders throughout the organization to find ways to improve the work environment” (U.S. House Donnelly Testimony 2016, 9). This jargon-laden email was meant to appease frustrated female employees but included little in the way of concrete steps to change the service's culture. More recently, in March 2016, the *Huffington Post*, in cooperation with The Investigative Fund at The Nation Institute, published a report on the assault of female Region 5 USFS employees in the Grand Canyon (Joyce 2016). Again, Chief Tidwell sent an “All Employee” email. He asserted that the stories told in the article were “older allegations,” though some of the stories told in the article occurred as late as 2016 (U.S. House Donnelly Testimony 2016, 9).

In 2016, Lenise Lago, the Deputy Chief of Business Operations at the USFS testified in front of the House Committee on Oversight and Government Reform defending the service against continued accusations of sexual harassment and gender discrimination. Though she acknowledged the prevalence of assault in the USFS, she argued that diligent work over the past five years has made the USFS a much more equitable and safe workplace for all employees. Contrary to Donnelly's statements, she asserts that the service's zero-tolerance policy is strict and that all ranking employees are required to report accusations of harassment.

In 2016, the USFS approved a new anti-harassment policy in an attempt to further eliminate harassment. Under the amended policy, management is required to notify officials within 24 hours of receiving a report of harassment. The officials that receive these reports must then initiate an investigation within three days and complete it within two weeks. The rest of the policy establishes that:

- All forms of harassment are banned, not just those prohibited by law.
- Notification, reporting, and tracking are required for cases alleging harassment. Notification requirements for witnesses and managers are mandatory.
- The agency must maintain a confidential reporting process consistent with legal requirements with clear guidelines for employees alleging harassment or employees who witness harassment.
- Specific requirements and parameters exist for supervisors and managers to conduct mandatory inquiries and request subsequent formal investigations into allegations of harassment.
- Those found to have engaged in harassment are held accountable for their actions (U.S. House Lago Testimony 2016).

The USFS also partnered with Employment Learning Innovations (ELI) to develop a customized, service-specific Civil Treatment for Managers course. This course is currently offered nationwide to USFS managers. In Region 5, more than 1,000 supervisors and managers have completed this training since 2014. Additionally, Specific Prevention of Sexual Harassment Training is conducted in Region 5. All employees in the region are required to attend this in-person training every year. On paper, the USFS has taken concrete action to combat the pervasive culture of harassment. The numbers appear to show that these actions are working. In 2016, the service received three complaints alleging sexual harassment and 48 complaints based on gender, the lowest levels in the last five years (U.S. House Lago Testimony 2016). However, this may not be a reliable metric for success. Reprisal is so dreaded by female employees that they are becoming more and more reluctant to file EEO complaints for fear of committing career suicide (Grate 2016).

Another important point raised by Lago is the high proportion of women in the service's workforce. Women make up 35 percent of USFS employees and 50 percent of executive leadership. These equitable levels are rare in the resource management industry. About half of total service employees are involved in fire management, and both the national director of fire management and her supervisor, the Deputy Chief of State and Private Forestry, are women (U.S. House Lago Testimony 2016).

However, it is difficult to imagine these new policies having much success when the parent agency of the USFS is also plagued by civil rights violations. The USDA has long been reported to have a dysfunctional Office of Civil Rights (OCR), under the leadership of Assistant Secretary for Civil Rights Dr. Joe Leonard. In 2015, the Office of Special Council sent a letter to then-President Obama laying out numerous problems occurring in the OCR, most of which are still unresolved. These include EEO issues, reprisal against victims, and complaints against senior OCR leaders (U.S. House Donnelly Testimony 2016). How can the OCR be expected to professionally and promptly address institutionalized sexual discrimination if they are unable to curb their own personnel issues and civil rights violations, even years after complaints are formally made?

As demonstrated, violations plague the entire organization. Specific employees commit acts of harassment and assault, regional leaders fail to address these instances, and the national

government branches seem unable to address their agency's shortcomings. Leaders assert that the service is doing all it can to prevent sexual harassment and assault in its workforce. Why then, are women still reporting high levels of gendered harassment? How can these national policies translate into actual change in the field?

What Next?

The CME, of which Donnelly is vice president, suggests that for a real cultural change to occur within the service, a collaborative approach between the agency, employees, and external sources, including organizations that specialize in equity training, is key. They emphasize the importance of including current and former employees who have been harassed and assaulted, as they have unique insight into the issue. The Coalition also suggests that in order for obstructionists to change, often the most senior employees must be weeded out of the service. Congressional oversight is key to their plan, as lack of drive by agency leaders has long been a pattern (U.S. House Donnelly Testimony 2016).

On paper, the solution seems simple, and the CME plan easy to follow. However, as usual, it is not so easy to put into practice. First, congressional oversight has proven difficult to achieve. In 2014, Congresswoman Jackie Speier, Congressman Peter DeFazio, and Congressman Raul M. Grijalva wrote a letter to USDA Inspector General Phyllis Fong. They expressed their concern about continued sexual harassment, assault, and gender discrimination as well as whistleblower retaliation against women in Region 5. They asked for an investigation, which never occurred, even in an administration that was sensitive to such issues (U.S. House Donnelly Testimony 2016). In President Trump's administration, an investigation and subsequent congressional intervention seems even less likely.

The CME plan also emphasizes the importance of removing senior, "traditionally-minded" employees. However, senior employees are difficult to terminate while keeping employee morale high. Because the resource management industry is relatively small and USFS work highly sought after, many employees serve for most of their career (Grate 2016). Terminating experienced, well-liked field leaders who have been on the job for decades may be nearly impossible. As government budget cuts continue to skyrocket and the national park system is on the brink of collapse, it may be unwise to terminate employees who have extensive knowledge of the systems they are working in (Grate 2016). Even if these employees are resistant to change, is it advantageous to terminate them, potentially at the expense of the ecosystems they are working to preserve? Because women have only recently been accepted into forestry and resource management arenas, most older, experienced rangers and other employees are male (Kaufman 2006). This is an unfortunate truth of the field, and attempting to fire all senior employees who have been complicit in discrimination would likely leave a leadership vacuum within the service, to the detriment of endangered wild places.

One of the most important requirements set forth by the CME, involvement of harassed female employees, is intensely difficult to achieve. Women who have been harassed by their male coworkers are often reluctant to be part of such a collaboration for a variety of reasons, including fear of reprisal and doubt that their efforts will lead to actual change. Past attempts to mediate these issues with outside agency participation have failed (U.S. House Donnelly Testimony 2016). In January 2015, USDA employees agreed to meet with seven female firefighters from Region 5. At a significant cost to taxpayers and the women involved, they flew to San Francisco to meet with the USDA Office of General Counsel, agency representatives, and a mediator judge. The women spent hours preparing for the meeting. After less than an hour of introductions and discussion, the

USDA walked away from the table and refused to return. The firefighters faced reprisal when they returned to their posts (U.S. House Donnelly Testimony 2016).

Additionally, women are becoming less likely to file EEO complaints, let alone publicly meet with officials (Grate 2016). As a CME official, Donnelly often receives information from those women fearful to come forward. In one instance, Donnelly received a call from a female firefighter who had been raped by a male coworker but was unwilling to report the incident or file an EEO complaint. She explained that a former female coworker had reported an attempted rape and been immediately terminated. The woman reported to Donnelly that she had children and a mortgage and could not afford to be fired. She continues to work with her rapist (U.S. House Donnelly Testimony 2016).

In addition to the financial burdens of retaliation, the USFS traditionally holds positions of prestige for those in the resource management world. Ranger and backcountry positions are competitive and can be extremely rewarding (Kaufman 2006). Rarely in other fields are employees paid to live in beautiful areas, work outside, and make a positive impact on the environment. Even if women choose to leave the USFS due to harassment, it is difficult to find work in other resource management positions because there are so few career opportunities and blacklisting occurs throughout the field, not just within the USFS (Grate 2016). Often women must choose between their dream jobs and reporting their assailants.

With this information in mind, the CME's plan of centralizing women's experiences in an attempt to change to USFS culture could be problematic to the very people it intends to serve. Should we prioritize the experiences of women over the success of the agency? Should the service demand that women take part in these conversations, regardless of the consequence to them? How can positive impact be made without harming already disadvantaged groups? It often takes a courageous few to sacrifice themselves for the betterment of many. But, after decades of discrimination and harm, should we ask these women to continue to fight the service's culture of discrimination with no foreseeable change in sight?

The case of harassment in the USFS appears, on paper, rather futile and hopeless. If the organization is unwilling or unable to address these issues properly, harassment will continue to occur unchecked. Some women will resign from the workforce, and many will choose to stay employed and remain silent. This case of widespread organizational sexual harassment can be extrapolated to other situations. Gendered discrimination and harassment can only be curbed with full support of leaders; women cannot be expected to adequately perform the duties of their jobs while also standing up for their rights as minority employees. Though the USFS is still fighting this issue, it has thus far been most successfully addressed by involving outside agencies like the CME. Recommendations for large, disparate organizations facing gendered harassment issues include early action, mandatory full workforce cooperation, and plans for protection of employees who come forward with complaints.

References

- Bernardi v. Yeutter*. 1990. 754 F.Supp. 743. Justia U.S. Law (accessed October 20, 2017)
- Burkhart, Christine. 2012. "Advocate Says Sexual Harassment is Widespread." *Porterville Recorder*, 8 August. http://www.recorderonline.com/advocate-says-sexual-harassment-is-widespread/article_425e06ee-6719-5742-b1ca-a46af55d1b9e.html (accessed December 3, 2017).
- Donnelly, Lesa (@DonnellyLes). 2017. "PEACE AND JUSTICE ACTIVIST." Tweet (accessed December 3, 2017).
- Donnelly v. Glickman*. 1998. 9 U.S. 159 F.3d 405. Justia U.S. Law (accessed October 20, 2017)
- Grate, Christina Marie. 2016. "Women in the National Park Service - Road to Equality: A Qualitative Analysis of the Perceptions of Female Employees." Department of Philosophy, Barry University, Miami Shores.
- Hanshaw, Annie. 2014. "Work Fit for 'Two Fisted' Rangers: Women in the U.S. Forest Service." *Women's History Matters*. <http://montanawomenshistory.org> (accessed November 9, 2017).
- Kathryn Joyce, "Out Here, No One Can Hear You Scream." *The Huffington Post*, 16 March, 2016. <http://highline.huffingtonpost.com/articles/en/park-rangers/> (accessed December 3, 2017).
- Kaufman, Polly Welts. 2006. *National Parks and the Woman's Voice: A History*. Albuquerque: University of New Mexico Press.
- Krista Langlois, "Female Firefighters Threaten to Sue the Forest Service – Again." *High Country News*, 24 September, 2014. <http://www.hcn.org/articles/california-women-threaten-to-sue-the-forest-service-again> (accessed December 2, 2017).
- Lyndsey Gilpin, "How the National Park Service is Failing Women." *High Country News*, 12 December, 2016. <http://www.hcn.org/issues/48.21/how-the-park-service-is-failing-women> (accessed November 3, 2017).
- U.S. Forest Service. 2017. "Leadership Biographies." <https://www.fs.fed.us/about-agency/newsroom/leadership-biographies> (accessed December 3, 2017).
- U.S. House of Representatives. Committee on Oversight and Government Reform. 2016. "Expanded Testimony of Lesa L. Donnelly." <https://oversight.house.gov/wp-content/uploads/2016/12/Donnelly-AGCoalition-Statement-12-1.pdf> (accessed November 3, 2017).

U.S. House of Representatives. Committee on Oversight and Government Reform. 2016. "Statement of Lenise Lago, Deputy Chief of Business Operations." https://www.fs.fed.us/sites/default/files/fs_media/fs_document/testimony-lago-12-01-16-hogr-harassment.pdf (accessed December 3, 2017).

Vesely, Rebecca. 2002. "Sexual Harassment Claims Plague Forest Service." *Women's eNews*. <http://womensenews.org/2002/11/sexual-harassment-claims-plague-forest-service/> (accessed November 13, 2017).

Weaver, Harriett. 2016. "Them were the days!: early days at Big Basin, Richardson Grove, Seacliff Beach, and Big Sur by the first woman uniformed member of the state park ranger field force." *Park Anniversary Organization*. <http://www.parkanniversary.org/pages/women/book-them-were-the-days.pdf> (accessed November 10, 2017).