

June 15, 2021

Dear Director Ortega,

I am a Senior Environmental Scientist in DTSC's Safer Consumer Products (SCP) program. I am writing to advocate for re-establishing the historical pay relationships between scientists and engineers that existed from the 1970's until 2005. As you are aware, there is ongoing concern with our classification's compensation, which is severely out of alignment with both vertical and horizontal pay scale relationships. This discrepancy is due to a lack of follow-through by previous administrations that restored the equal pay for equal work relationship between supervising scientists and engineers, while leaving rank-and-file scientists behind.

Without prompt action to address this pay inequity, we anticipate adverse impacts to our program in terms of hiring, morale, and retention. For a program that is still in the early stages of its existence, the next several years of growth and development are critical. Without correcting this disparity, not only will SCP continue to be unable to attract top talent during recruitment but will also continue to struggle with retaining scientists over the long-term, due to unequal pay and the myriad negative consequences associated with this inequality. We urge the Newsom Administration to correct this disparity during the current round of contract negotiations.

Within our program, there is no distinction between tasks assigned to the Environmental Scientist (ES) series and Hazardous Substances Engineer (HSE) series. Staff from both series are distributed across all teams and participate in a mix of technical and policy-based work without regard to classification. Senior ESs and Senior HSEs lead workgroups with equal frequency, often providing direction to both HSEs and ESs. It is demoralizing for Senior ESs tasked with these responsibilities to earn 20-30% less than Senior HSEs for the same work, let alone earn less than the HSEs under their charge. For more than twenty years, prior to 2005, engineers and scientists of equal rank were compensated with a differential of 5% or less.

SCP needs ESs to successfully carry out its mandate. ESs in SCP often have more extensive training and interdisciplinary experience, which helps them navigate the nebulous space between technical assessment and regulatory implementation. Our program currently has Senior ESs and ESs (most of which have PhDs) with technical backgrounds in chemistry, biology, toxicology, ecology, marine sciences, and environmental planning and policy. Diversity in perspective is essential for productive teamwork and informed decision-making. The program will lose dimension if positions are converted to HSEs to attract candidates through higher compensation.

SCP must remain competitive to attract and retain top talent that can further its mission. Scientists working for the Federal Government and for counties across California earn significantly more than those working for DTSC. The maximum salary for a San Francisco County Senior Environmental Specialist is 21.4% more than the maximum for DTSC's Senior ES position, and the salary for a Federal Scientist (GS-13) is 32.3% more. In addition, California's Air Resources Board (ARB) pays their scientists like engineers; SCP has already lost ESs to ARB.

The pay inequity problem has become apparent to those external to the program as well. Various NGOs have spoken about the need to fairly compensate the scientists in SCP. Kelly Moran of TDC Environmental, a member of SCP's Green Ribbon Science Panel, conveyed her concerns to DTSC's Independent Review Panel. Gina Solomon, former CalEPA Deputy Secretary for Science and Health and

currently with the Public Health Initiative, mentioned the pay inequity issue in both her recent report, *California's Green Chemistry Initiative at Age 10*, and in her testimony to the Assembly Environmental Safety & Toxic Materials Committee and Senate Environmental Quality Committee. We urge you to thoughtfully consider our request for parity with our HSE colleagues who are doing identical work, and to advocate for restoring the historical salary relationships that existed between scientists and engineers for over 20 years.

This is an opportunity for the Newsom Administration to demonstrate its commitment to those who work hard every day to ensure that California excels in scientific leadership and environmental protection. My colleagues and I are enthusiastic about the strides we have made thus far in SCP, and strongly believe that more equitable compensation will help SCP attract and retain the diverse and innovative workforce needed to lead the nation forward in toxics reduction and safer products. Without reestablishing parity, I fear that many of our exceptionally skilled, passionate, and impactful scientists will choose to take their talents elsewhere in exchange for fair compensation.

Sincerely,



Michelle Romero Fishback, PhD
Senior Environmental Scientist
Safer Consumer Products Program
Department of Toxic Substances Control
1001 I St, 12th Floor
Sacramento, CA 95812-0806
916-445-6011