

June 22, 2021

Ms. Eraina Ortega, Director
California Department of Human Resources
1515 S Street, North Building, Suite 500
Sacramento, California 95811-7258

Dear Director Ortega,

I am an Associate Toxicologist with the Department of Toxic Substances Control (DTSC) and am grateful for the opportunity to have dedicated my career to helping protect public health and the environment. I respectfully request that the State end the salary inequity experienced by California State Toxicologists and other State Scientists. Please show that the State supports science and values all State Scientists committed to protecting Californians and our environment.

State Toxicologists at DTSC, Office of Health Hazard Assessment (OEHHA), Department of Pesticide Regulation, and Department of Fish and Wildlife are charged with applying the best currently available science in ensuring that human health and the environment are protected from harmful chemicals. Science-based decisions require a high level of expertise based on advanced education, years of training and experience, and continual education. However, the low salaries received by Toxicologists are not commensurate with the required education and expertise. This results in difficulties with recruitment and retention.

I started my career as a scientist for the State of California more than 35 years ago with the Department of Health Services Toxic Substances Control Program, which later became a separate Department (DTSC). As a Hazard Substances Scientist, I inspected and investigated hazardous waste sites and later provided consultative support for project managers on toxic chemicals in the environment and other aspects of environmental investigation and assessment of potential human exposures to toxic chemicals. After several years of gaining valuable experience, I joined DTSC's toxicology group—currently the Human and Ecological Risk Office--as an Associate Toxicologist, a relatively new classification at that time.

The minimum qualifications for Associate Toxicologist are a possession of a Doctoral Degree in Toxicology, Biochemistry, Pharmacology or a closely related specialty, or possession of a Master of Science (M.S.) Degree in one of these specialties and three years of relevant experience past receipt of the M.S. Degree. I met the latter criteria, possessing a Bachelor of Science (B.S.) degree in Environmental Toxicology from University of California, Davis, and a Master of Science (M.S.) degree in Veterinary Science (Toxicology) from University of Idaho/Washington State University, and had sufficient relevant experience to enter the class near the top of Range B.

My primary responsibility is to review human health risk assessments (HHRAs) and remedial goals for sites/properties contaminated with toxic chemicals to ensure human health is adequately protected under current or future land uses. My projects are current or former military bases, complex sites with many types of contaminants in multiple environmental media. I provide technical consultation for DTSC project managers, including Senior Hazardous Substances Engineers, Senior Engineering Geologists, and Senior Environmental Scientists, and, upon request, meet directly with responsible parties to provide technical direction and explain the rationale for recommendations for HHRA documents and documents supporting the HHRA.

One area in which I have specific expertise is assessing health risks from vapor intrusion—the migration of volatile toxic chemicals from contaminated groundwater or soil into the indoor air of buildings where occupants may be exposed by inhaling the contaminants. I assisted with revision and production of the 2011 DTSC guidance for evaluating vapor intrusion, a primary resource for stakeholders and regulatory staff. Since 2014, I have been a primary member of the CalEPA Vapor Intrusion Workgroup along with other staff from DTSC, OEHHA, State Water Resources Control Board, and several Regional Water Quality Control Boards. The Workgroup has developed supplemental guidance to quickly assess potential vapor intrusion risks for occupants of buildings at or near contaminated sites, which is increasingly important as the pressure to develop housing means redevelopment of known or potentially contaminated properties.

Working on multi-disciplinary teams of Scientists, Engineers, Engineering Geologists, and support staff for site projects and special projects such as the CalEPA Vapor Intrusion Workgroup is one of the more rewarding aspects of my work. Yet, the ongoing and increasing disparities in salary are a growing source of frustration. Since reaching the top step of Associate Toxicologist Range B in 1994, I have received only the occasional general salary increase.

Since 2003, general as well as specific salary increases have favored Engineers and Engineering Geologists, further widening the salary disparity for Toxicologists and other Scientists. For example, among the Senior Engineers, and Engineering and Senior Engineering Geologists, as well as Senior and Staff Toxicologists, and Research Scientist III in the CalEPA Vapor Intrusion Workgroup, my salary is, by far, the least (see the Figure below). The Associate Toxicologist Range B salary is lower than other Scientists: 10 percent lower than the Research Scientist III salary, even though class minimum requirements for education and relevant work experience are the same, and nearly three percent lower than the Senior Environmental Scientist Specialist salary.

Furthermore, private sector consultants with similar qualifications, whose human health risk assessments for toxic contaminants I review and with whom I meet to resolve the complex and detailed aspects of those risk assessments, have salaries more than twice that of mine as a DTSC Associate Toxicologist (Society of Toxicology Tenth Triennial Salary Survey for 2017).

The growing salary disparity between Toxicologists and Engineers/Geologists is shown in the Figure below. In 2000, the Senior Engineering Geologist salary was 8.5 percent greater than the Associate Toxicologist salary. The difference grew to **48 percent** in 2019 and 2020. In 2003, the Associate Toxicologist salary was 1.2 percent greater than that of Hazardous Substances Engineer Range D. However, in 2019 and 2020, the Engineer Range D salary had increased to exceed that of Associate Toxicologist by nearly 26 percent. Furthermore, Engineers and Geologists with 20 or more years of service receive longevity pay which has never been offered to Scientists and widens the salary gap even further.

I have grown weary of having retiring Engineer or Geologist colleagues, much younger than me and with many fewer years of service, ask why I do not retire, given my many years of service. I remind them that my salary—and anticipated retirement income—is a fraction of theirs.

The California Department of Human Resources has never offered a reasonable explanation for this unfair, unjust salary inequity. With every round of bargaining in the past 18 years, I have been disheartened—and in disbelief—that the State continues to show how little it values its Scientists. This inequity for scientists dramatically increases the difficulty of recruiting and retaining experienced Toxicologists and other Scientists.

Please show that the State supports science and values all State Scientists by ending the salary inequity for Scientists.

Sincerely,

A large black rectangular redaction box covers the signature and name of the author.

Figure (next page)

Figure: Maximum Monthly Salaries - Staff and Associate Toxicologist Salaries Decrease Relative to Hazardous Substances Engineer and Senior Engineering Geologist

