



**To:** Spokane River Regional Toxics Task Force  
**Re:** Proposal to Evaluate Applicable Methods under TSCA Section 21 and Develop a Strategy to Petition EPA to Initiate a Proceeding for the Amendment or Repeal of the Exclusion for Inadvertently Generated PCBs  
**Date:** 23 December 2023

### **Statement of Qualifications**

AKWA-DC is a policy consulting and advocacy shop based in Alaska and Washington State with a strong presence in Washington, D.C. We were founded in 2019 with the guiding principle that Alaskans, Pacific Northwesterners, and many around the country lacked effective, full-service representation in DC and at home. Today, our mission remains unchanged: provide clients in the ocean and environmental space with a strong advocacy voice, a fresh perspective, and values-driven strategy and analysis in public policy processes. The challenges facing the Pacific Northwest and our nation are not simple: climate change, a global pandemic, political polarization, and ongoing economic turmoil. AKWA-DC stands prepared to navigate these complex dynamics and find creative solutions.

AKWA-DC has worked with environmental advocacy groups, fishermen's organizations, start-ups, and non-profits. Currently, our client list includes: the Alaska Ocean Cluster, Burro Creek LLC, Coastal Villages Region Fund, High Street Strategies, the International Maritime Law Group, the North American Marine Alliance, the Ocean Foundation, Ocean Conservancy, the Arctic-Yukon-Kuskokwim Tribal Consortium, Salmon Beyond Borders, and Tidal Vision.

While our experience hews closely to the maritime sector, AKWA-DC has proven expertise in navigating the EPA regulatory process as it pertains to the regulation of toxic substances. We pride ourselves on our ability to engage with EPA capably and effectively at the regional and headquarters level. Our team recently completed a successful regulatory effort to list chitosan on EPA's Minimum Risk List (25b) for pesticides, the first ever such addition to this list. We look forward to the opportunity to leverage this experience in support of the Spokane River Regional Toxics Task Force (SRRTTF) and its goal of strengthening federal regulation of PCBs under the Toxic Substances Control Act (TSCA).

### **The Team – Resumes attached**

#### ***Ephraim Froehlich, Founder and Principal***

Ephraim is the founder and principal of AKWA-DC. He leverages more than a decade of experience as a policy expert along with relationships developed at the highest levels of



government to achieve legislative and regulatory results. Ephraim provides clients valuable counsel and innovative solutions in the fisheries, maritime, environmental sectors, and beyond.

Prior to founding AKWA-DC, Ephraim served Alaska as Governor Bill Walker's Senior Advisor on Fish & Game and Deputy Director of Federal Affairs. Before joining Governor Walker's team, Ephraim was staff for Senator Lisa Murkowski for nearly a decade, serving both before and after law school in senior policy roles focused on fisheries and natural resources.

Currently Ephraim serves on the boards of the Arctic Encounter Symposium, the Seattle Chamber of Commerce, the Alaska Ocean Center, and the Washington Wildlife and Recreation Coalition. He is also the chair of the Alaska Business Forum. Ephraim was born and raised in Juneau, Alaska, earned a Juris Doctor from the University of Maryland, and a Bachelor's degree from Dartmouth College.

#### ***Ann Robertson, Policy Director***

Ann joined AKWA-DC in 2021 after serving more than three years as fisheries advisor in the Office of Senator Lisa Murkowski. During her time working in the Senate, Ann played a key role representing Senator Murkowski in negotiations on COVID aid for the fishing sector, successfully advocated for increased funding for federal ocean science, and defended Alaska's priorities throughout the legislative and appropriations process.

Prior to working in the Senator's office, she spent four years as a research contractor with the Alaska Fisheries Science Center (NOAA/NMFS) and 4 months as a Policy Intern at the White House Office of Science and Technology Policy (OSTP) in Washington, D.C.

Hailing from Juneau, Alaska, Ann brings a practical blend of scientific expertise, extensive community stakeholder and policymaker connections, and a deep understanding of State and Federal environmental policy. Ann holds a BA in Earth Science from Vassar College and a Master's in Environmental Management from Yale University.

#### **Proposed Scope of Work**

- AKWA-DC will evaluate potential pathways for petitioning EPA to reevaluate the TSCA allowance for iPCBs with the intention of either reducing or eliminating the existing allowance for inadvertently generated PCBs that is hindering the SRRTTF's work. Drawing on our experience with EPA's regulatory process, AKWA-DC will work with SRRTTF to identify the most feasible route with the highest likelihood for success.
- Working closely with SRRTTF, AKWA-DC will develop a detailed strategy that consists of two complementary lines of effort.



- First, AKWA-DC will support the development of a robust and well-reasoned petition, based on SRRTTF's technical expertise and objectives, for submission under Sec. 21 of TSCA, along with a step-wise submission process and timeline. Additionally, AKWA-DC will build out a proposed meeting list of EPA headquarters and region staff to develop familiarity and support within the Agency for the SRRTTF and its effort.
- To build momentum behind a potential regulatory petition to reevaluate the allowance for iPCBs under TSCA, AKWA-DC will also develop, and would be prepared to execute, a parallel political strategy focused on developing support for SRRTTF's petition among lawmakers, their staff, relevant Congressional Committees, and likeminded stakeholder groups. This will include target meeting lists and goals for hearings and language.
- Our primary objective will be a successful petition to reduce or eliminate the allowance for iPCBs, but AKWA-DC will also develop alternative pathways for SRRTTF to consider while the regulatory process proceeds. Options may include legislative language, report language to be included in an Appropriations bill, or direct pressure from relevant lawmakers, Committee chairs, interest groups, and other stakeholders.

### **Proposed Fee**

\$7,500 per month

AKWA-DC operates on a retainer basis, paid monthly in advance, for a fixed period of time. Fees are based on the scope of the engagement and the complexity of the work involved.

If this fee is not agreeable to SRRTTF, AKWA-DC welcomes continued discussion to arrive at a fee structure that works for both parties, as we believe our values are aligned and SRRTTF's mission is meaningful to our team.