

EXECUTIVE CORE QUALIFICATION NARRATIVES

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The following five Executive Core Qualification (ECQ) narratives are submitted in support of Alexandra M. Chen's Senior Executive Service application. Each narrative follows the OPM Challenge-Context-Action-Result (CCAR) framework and draws on 22 years of progressive federal legal leadership spanning the U.S. Environmental Protection Agency and the U.S. Department of Justice, Environment and Natural Resources Division.

ECQ 1: LEADING CHANGE

Demonstrating creativity, innovation, and the ability to lead and manage large-scale organizational transformation.

Story 1: Redesigning Federal Environmental Rulemaking Legal Review to Accelerate Agency Action

CHALLENGE

EPA's Office of General Counsel was processing rulemaking legal clearances in an average of 47 days — a timeline that created bottlenecks across the agency's highest-priority regulatory programs and threatened compliance with statutory deadlines. The problem was structural, not inherent to legal complexity: the existing clearance process was sequential, undocumented as a system, and dependent on ad hoc attorney judgment rather than standardized legal sufficiency frameworks. As the agency's environmental regulatory docket grew more demanding — with three simultaneous major Clean Air Act rulemakings and mounting enforcement obligations — the status quo posed a direct risk to the agency's ability to promulgate legally defensible regulations on schedule.

CONTEXT

As Senior Regulatory Counsel and Deputy Division Director at EPA's Office of General Counsel, I served as senior legal advisor to the Office of Air and Radiation and Office of Water, overseeing a docket of more than 80 active regulatory and enforcement matters and directly supervising 14 attorneys in OGC's Air and Climate Law Division. I also served as a principal legal counselor to the EPA Administrator and Deputy Administrator. The process inefficiency I identified fell directly within my sphere of operational authority.

ACTION

I redesigned OGC's rulemaking legal clearance architecture from a sequential review model to a parallel review framework built around standardized legal sufficiency templates. I developed tiered review protocols calibrated to regulatory complexity — ensuring legally straightforward rulemakings received appropriately streamlined review while significant rules received proportional analytical rigor. I created standardized legal sufficiency checklists for recurring regulatory issues under the Clean Air Act, Clean Water Act, and Administrative Procedure Act, enabling attorneys to proceed efficiently without sacrificing legal precision. Critically, I implemented these changes without requesting additional staff, relying entirely on workflow redesign and process standardization.

RESULT

Average rulemaking legal clearance time dropped from 47 days to 19 days — a 60 percent reduction — with no increase in staff. The framework enabled OGC to support three simultaneous major Clean Air Act rulemakings, all successfully defended in the D.C. Circuit against 12 consolidated industry challenges. It was adopted as OGC's standard rulemaking review process and served as the foundation for subsequent process improvements across the office.

Story 2: Building OGC's First Structured Attorney Professional Development Program

CHALLENGE

EPA's Office of General Counsel was losing experienced environmental attorneys at a 28 percent annual attrition rate — an unsustainable pace that threatened the agency's institutional knowledge base and its capacity to staff a growing and increasingly complex regulatory docket. Departure patterns revealed a systemic gap: OGC had no structured competency framework, no formal mentorship architecture, and no pathway for attorneys to build the diverse experience needed for career advancement. Without a meaningful professional development infrastructure, high-potential attorneys were departing for private sector positions, leaving the agency less equipped to defend its most consequential regulatory actions.

CONTEXT

As Deputy Division Director of OGC's Air and Climate Law Division, I directly supervised 14 attorneys and observed firsthand the connection between professional development gaps and attrition among the division's strongest performers. I recognized the problem as both a talent retention crisis and a long-term mission risk — one that fell squarely within my authority and institutional position to address.

ACTION

I designed OGC's first structured Attorney Professional Development Program from the ground up. I established a competency-based assessment framework mapping attorney skills against the legal competencies most critical to OGC's mission. I created a formal mentorship pairing system matching junior attorneys with senior counsel for sustained developmental relationships and designed structured litigation experience rotations that gave attorneys systematic exposure to diverse regulatory and enforcement matters. I mapped developmental milestones explicitly to GS-14/15 advancement qualifications, giving attorneys a concrete and transparent career pathway for the first time. I designed the program to build institutional loyalty alongside legal skills treating professional development not as a benefit but as a mission-critical investment in OGC's long-term capacity.

RESULT

The program was adopted agency-wide in 2022 and credited with reducing attorney attrition from 28 percent to 9 percent — a reduction of more than two-thirds. Fourteen junior attorneys mentored through the program advanced to GS-14/15 or DOJ senior trial attorney positions. OGC's institutional knowledge base was preserved and strengthened at a time when the agency's regulatory and enforcement responsibilities were at their most demanding.

ECQ 2: LEADING PEOPLE

Demonstrating the ability to design and implement strategies that maximize employee performance, foster high performance and teamwork, and lead diverse workforces.

Story 1: Leading the Air and Climate Law Division Through a Record Regulatory and Enforcement Docket

CHALLENGE

EPA's Office of General Counsel faced one of its most demanding regulatory and enforcement periods in recent memory — three simultaneous major Clean Air Act rulemakings affecting more than 300 million Americans, an active \$1.4 billion Clean Water Act enforcement action, and a docket exceeding 80 active matters — at a time when the division was also experiencing its highest attorney attrition rate in years. Leading a team of 14 attorneys through this environment required not only technical legal supervision but sustained executive leadership: maintaining cohesion, focus, and performance under pressure while simultaneously addressing the structural workforce challenges driving attrition.

CONTEXT

As Deputy Division Director of OGC's Air and Climate Law Division, I held direct supervisory responsibility for 14 attorneys working across regulatory counsel, enforcement, and litigation support functions, while simultaneously serving as senior legal advisor to the EPA's Office of Air and Radiation and Office of Water and as a principal counselor to the EPA Administrator and Deputy Administrator. My leadership of the division was nested within an already demanding span of institutional obligations.

ACTION

I established a leadership approach grounded in mission clarity, operational transparency, and individual attorney development. I implemented structured workload distribution protocols that balanced portfolio demands across the division without concentrating unsustainable burdens on individual attorneys and held regular developmental conversations connecting each attorney's work to the division's larger mission. I created internal knowledge-sharing forums that built collective legal expertise across the docket, reducing dependence on individual subject matter expertise. I simultaneously designed and stood up OGC's first structured attorney professional development program, building the institutional infrastructure needed to retain and develop the attorneys I was leading.

RESULT

The division sustained full operational tempo across its record docket — supporting three simultaneous major CAA rulemakings, all successfully defended in the D.C. Circuit, while managing the \$1.4 billion Clean Water Act enforcement action and 80+ active matters. Attorney attrition fell from 28 percent to 9 percent. The division's performance during this period established it as OGC's model for managing large, complex, high-stakes dockets under sustained operational pressure.

Story 2: Building and Leading DOJ ENRD's Environmental Defense Section Through a Demanding Litigation Docket

CHALLENGE

When I assumed supervisory responsibility for DOJ's ENRD Environmental Defense Section, the unit was managing a docket of more than 60 active federal environmental cases across seven circuit courts without a case management infrastructure adequate to the volume. Cases were advancing on inconsistent timelines, attorney bandwidth was being consumed by administrative coordination rather than substantive legal work, and a backlog of 47 matters had accumulated — cases posing latent litigation risk for the government. The section needed leadership that could raise operational performance without disrupting the effectiveness of attorneys deeply engaged in active federal court proceedings.

CONTEXT

As Section Supervisor in DOJ ENRD's Environmental Defense Section, I was responsible for professional development, case assignments, litigation strategy oversight, and day-to-day management of eight trial attorneys handling more than 60 active matters. I simultaneously carried first-chair litigation responsibilities across the D.C., 4th, and 5th Circuits — operating as both a practicing senior litigator and a supervisory leader.

ACTION

I implemented case management reforms creating consistent, section-wide protocols for tracking case status, managing litigation timelines, and coordinating across the section's distributed docket. I established structured case review forums giving all section attorneys visibility into cross-cutting legal issues and enabling collective problem-solving on novel questions arising across different matters. I identified high-potential attorneys and developed targeted mentorship relationships to accelerate their advancement, and redesigned how the section allocated attorney time to ensure developing attorneys were building substantive litigation skills while senior attorney bandwidth was preserved for the section's highest-stakes proceedings.

RESULT

Case management reforms reduced the section's average case-to-resolution time by 34 percent and eliminated the 47-case backlog within 18 months, freeing significant attorney capacity for higher-complexity litigation. The section achieved favorable outcomes in 20 of 23 first chair matters I personally litigated during this period. Attorneys I developed advanced to senior positions across DOJ and EPA, extending the section's developmental impact well beyond its immediate docket.

ECQ 3: RESULTS DRIVEN

Demonstrating a commitment to accountability and continuous improvement, delivering measurable results in complex and high-stakes environments.

Story 1: Securing the Largest Water Enforcement Settlement in EPA Region 3 History

CHALLENGE

A Fortune 100 chemical manufacturer had been operating in sustained violation of Clean Water Act discharge standards, contaminating waterways across multiple states. Achieving accountability requires designing and executing a litigation and negotiation strategy capable of securing a settlement commensurate with the full scope of violations against one of the most well-resourced corporate defendants in federal environmental enforcement history. The company's legal team was among the most experienced in environmental defense litigation, and the complexity of the multistate violations — spanning multiple discharge points, regulatory jurisdictions, and contested technical assessments — made the path to settlement highly contested at every stage.

CONTEXT

As Senior Regulatory Counsel and Deputy Division Director at EPA's Office of General Counsel, I was assigned lead legal counsel responsibility for what would become the largest water enforcement action in EPA Region 3 history. I coordinated across EPA enforcement staff, DOJ, state environmental agencies, and technical experts while simultaneously managing my broader OGC advisory responsibilities. The matter required 14 months of active litigation and negotiation before final terms were secured.

ACTION

I led the enforcement legal strategy from initial case assessment through final consent decree negotiation. I developed and coordinated the legal theory of liability across multiple discharge points and regulatory timeframes, working closely with EPA's enforcement and technical staff to build a factual record capable of withstanding adversarial challenge at every stage. I directed the negotiation strategy across 14 months of complex litigation, making the assessment — contested internally at several points — that pressing for a settlement figure commensurate with the full scope of violations was both legally achievable and institutionally necessary to establish a credible enforcement posture for future major actions. I coordinated final terms across federal and state jurisdictions and managed the legal review process required to finalize a consent decree of this magnitude.

RESULT

The final consent decree secured \$1.4 billion in penalties, cleanup commitments, and injunctive relief — the largest water enforcement settlement in EPA Region 3 history. The settlement established a precedent for enforcement accountability against major industrial dischargers under the Clean Water Act. It was recognized with EPA's Gold Medal for Exceptional Service, the agency's highest honor, presented by the Administrator.

Story 2: Defending EPA's Mercury and Air Toxics Standards Rule

CHALLENGE

EPA's Mercury and Air Toxics Standards (MATS) rule — a landmark regulation protecting Americans from toxic air emissions from power plants, with an estimated \$37 billion in annual public health benefits — faced well-funded, sustained legal challenge from industry opponents in district and circuit courts. The legal questions were novel, the political stakes were high, and the litigation unfolded against aggressive industry opposition producing multiple simultaneous challenges across jurisdictions. A failure to defend the rule would have exposed the agency to substantial regulatory setback and signaled institutional vulnerability in its most important air enforcement program.

CONTEXT

As Senior Trial Attorney and Section Supervisor in DOJ ENRD's Environmental Defense Section, I was assigned lead legal defense responsibility for the MATS rule litigation through district and circuit court challenges. I operated as a practicing first-chair litigator while simultaneously managing my section supervisory responsibilities — making real-time strategic litigation judgments across multiple proceedings while keeping the section's broader docket moving.

ACTION

I developed the core legal defense strategy for the MATS rule litigation, working in close coordination with EPA's Office of General Counsel to align the litigation posture with the agency's regulatory and policy objectives. I made strategic decisions about how to present the agency's legal justifications across multiple proceedings in ways that would build a durable, consistent record for appellate review. I argued the government's position in circuit court proceedings involving questions of first impression under the Clean Air Act, providing the agency its most critical judicial advocacy at each stage of the litigation.

RESULT

The MATS rule survived all district and circuit court challenges during my period of lead responsibility — contributing directly to the rule's continued effect as one of EPA's most protective air quality regulations and preserving an estimated \$37 billion in annual public health benefits. The litigation defense was recognized with the Department of Justice Attorney General's Award for Distinguished Service.

ECQ 4: BUSINESS ACUMEN

Demonstrating the ability to acquire and administer human, financial, material, and information resources to accomplish organizational goals.

Story 1: Managing OGC's Air and Climate Law Division Through a Record Regulatory Period with Fixed Resources

CHALLENGE

EPA's Office of General Counsel faced peak regulatory demand — three simultaneous major Clean Air Act rulemakings, a \$1.4 billion Clean Water Act enforcement action, and a docket exceeding 80 active matters — with a fixed attorney complement of 14 and no increase in operating resources. Managing this workload without degrading legal quality, burning out staff, or missing statutory deadlines required disciplined resource management: strategic portfolio allocation, workload analysis, and process redesign to extract maximum productivity from a constrained set of human and institutional assets.

CONTEXT

As Deputy Division Director of OGC's Air and Climate Law Division, I held full resource management responsibility for the division — including attorney assignment, workload distribution, process design, and operational alignment — while simultaneously serving as lead legal advisor to the Office of Air and Radiation and Office of Water. I could not resolve resource constraints through additional hiring, which required finding efficiency through structural means rather than capacity expansion.

ACTION

I conducted a systematic workload analysis across the division's docket and redesigned internal assignment protocols to match attorney expertise and availability to case demands with greater precision. I implemented the parallel review framework that cut rulemaking clearance time from 47 to 19 days — a process efficiency that effectively recovered significant attorney capacity without increasing headcount. I established a cross-divisional litigation coordination framework eliminating redundant DOJ-EPA case handoffs, recovering more than 1,800 attorney-hours annually across the enforcement docket. I also implemented tiered matter management protocols distinguishing high-complexity regulatory matters requiring intensive senior attention from matters that could be managed efficiently by developing attorneys under appropriate supervision.

RESULT

The division managed its record docket — 80+ matters, three simultaneous major rulemakings, and a \$1.4 billion enforcement action — with a fixed complement of 14 attorneys and no increase in resources, while achieving successful defense of all three major rulemakings in the D.C. Circuit and securing the largest water enforcement settlement in EPA Region 3 history. Process reforms recovered 1,800+ attorney-hours annually and reduced rulemaking clearance time by 60 percent, producing measurable efficiency gains without additional investment.

Story 2: Restructuring DOJ ENRD Section Docket Management to Eliminate a 47-Case Backlog

CHALLENGE

DOJ ENRD's Environmental Defense Section was managing a docket of more than 60 active federal environmental matters without a case management infrastructure adequate to the volume. Cases advanced on inconsistent timelines, attorney bandwidth was absorbed by administrative coordination rather than substantive legal work, and a 47-case backlog had accumulated — matters not receiving the attention they required and posing latent liability risk for the government in active federal proceedings. The absence of systematic docket management was both a resource management failure and a litigation risk.

CONTEXT

As Section Supervisor in DOJ ENRD's Environmental Defense Section, I held managerial responsibility for the section's full docket and its eight trial attorneys. I had direct authority to redesign the section's internal case management processes and the professional standing to implement reforms requiring behavioral change — without formal regulatory authority over the workflow habits that had produced the backlog.

ACTION

I implemented a case management reform program introducing standardized milestone tracking, consistent litigation timeline protocols, and regular section-wide docket reviews that created collective accountability for case

progress across all 60+ matters. I established clear triage criteria for prioritizing attorney attention by case risk, statutory deadline, and litigation stage — replacing the implicit priority system that had allowed the backlog to accumulate. I also redesigned how the section allocated attorney time, ensuring developing attorneys were building substantive litigation skills rather than absorbing administrative burden, and that senior attorney bandwidth was preserved for the section's highest-stakes proceedings.

RESULT

The 47-case backlog was eliminated within 18 months. Average case-to-resolution time across the section decreased by 34 percent. The section's reformed docket management infrastructure was recognized within DOJ ENRD as a model for managing high-volume environmental litigation sections and served as the basis for division-wide case management reforms.

ECQ 5: BUILDING COALITIONS

Demonstrating the ability to build coalitions internally and externally, influence others, negotiate, and build consensus to achieve common goals.

Story 1: Co-Authoring the EPA-DOJ Joint Enforcement Coordination Framework

CHALLENGE

Federal environmental enforcement frequently requires concurrent civil and administrative proceedings involving both the Department of Justice and EPA — yet the two agencies had no formal, shared framework for coordinating these actions. Case handoffs were inconsistent, duplicative effort was common, and the absence of shared protocols meant that enforcement attorneys at both agencies were regularly reinventing coordination approaches on a matter-by-matter basis. The lack of an interagency framework was reducing enforcement efficiency, creating legal inconsistency across concurrent proceedings, and weakening the government's institutional posture in complex environmental enforcement matters.

CONTEXT

While serving as Senior Trial Attorney and Section Supervisor in DOJ ENRD's Environmental Defense Section, I was selected as DOJ ENRD's representative to the EPA-DOJ Joint Enforcement Coordination Working Group — a cross-agency body convened to address the coordination gap. I brought to the working group deep institutional knowledge of both agencies: I had begun my career in DOJ's Honors Program, completed a six-month detail at EPA's Office of General Counsel, and had extensive experience navigating the interface between the two agencies' enforcement functions.

ACTION

I co-led the working group's development of formal interagency coordination protocols, drawing on my direct experience with the operational friction that the absence of such protocols had produced. I worked across agency lines to build consensus among attorneys and managers at both DOJ and EPA who had developed entrenched — and sometimes competing — institutional practices. I designed the coordination framework to be operationally practical rather than aspirationally comprehensive, focusing on the specific handoff points and concurrent proceeding scenarios that produced the most inefficiency and inconsistency in practice. I negotiated the language and scope of the protocols with EPA counterparts who held different institutional priorities, building the shared understanding necessary for protocols that both agencies would use.

RESULT

The interagency protocols I co-authored were adopted by both DOJ and EPA as the governing framework for concurrent civil and administrative enforcement actions. The framework eliminated the most significant sources of duplicative effort and legal inconsistency across concurrent proceedings and established a durable institutional foundation for EPA-DOJ enforcement coordination that both agencies continue to use.

Story 2: Negotiating Six Superfund Consent Decrees Across a Complex Multi-Party Coalition

CHALLENGE

CERCLA Superfund enforcement requires achieving settlement with multiple potentially responsible parties — industrial companies, municipalities, and other entities with varying degrees of liability, sharply divergent financial interests, and often adversarial relationships with each other as well as with the government. Achieving \$680 million in cleanup commitments across six consent decrees required not merely legal negotiation skill but sustained coalition management: building and maintaining the conditions under which parties with competing interests would accept their respective shares of liability and enter binding remediation commitments across multi-year settlement processes.

CONTEXT

As Senior Trial Attorney in DOJ ENRD's Environmental Defense Section, I held lead negotiating responsibility for a portfolio of six Superfund consent decrees, coordinating across EPA, state environmental agencies, and private potentially responsible parties across multiple simultaneous multi-year settlement processes. The negotiations required sustained engagement across a complex stakeholder matrix — federal and state regulators with distinct enforcement priorities, and multiple private parties whose cooperation with each other was often as fragile as their cooperation with the government.

ACTION

I developed and executed a negotiation strategy for each consent decree that accounted not only for the government's legal position but for the specific coalition dynamics among responsible parties at each site. I invested in relationship-building with state environmental agency counterparts whose cooperation was essential to achieving binding commitments within their jurisdictions and built working relationships with private party counsel that enabled productive negotiation without undermining the government's enforcement posture. Where responsible parties conflicted with each other over relative liability shares, I navigated those conflicts strategically — recognizing that inter-party disputes, if unmanaged, could collapse the multi-party settlement processes the government needed to achieve its cleanup objectives. I coordinated with EPA technical and enforcement staff across multiple sites simultaneously, ensuring negotiated terms were both legally sound and technically achievable.

RESULT

The six consent decrees secured \$680 million in CERCLA cleanup commitments — delivering environmental remediation across multiple contaminated sites affecting communities in several states. All six decrees were finalized within the negotiation timelines I managed, demonstrating the effectiveness of a coalition-focused approach across the full portfolio.