To: Spokane River Regional Toxics Task Force  
From: AKWA-DC  
Re: Proposed Timeline for First-Stage S.21 Petition  
Date: 7 January 2023

After meeting to discuss AKWA-DC’s proposal re: SRRTTF’s Section 21 iPCB petition, our team put together this draft timeline for review and discussion. The bullets below are intended to guide the necessary preliminary work ahead of the significant undertaking of drafting and preparing the actual petition. For this proposed work, totaling to approximately 45 days, AKWA-DC proposes a fee of $10,000, to be paid upon completion of the deliverables outlined below.

- Meet w/ SRRTTF on background to guide process (Immediate)
  - Gather, review, and catalog previous documents and work product relating to iPCBs and petition background
  - Account and catalog previous meetings with policymakers at the state and federal level
- Petition Plan (1 month timeline)
  - Review previously successful petitions and request experiential advice from respective petitioners
  - Quietly and informally discuss best path forward with agency staff
  - Identify core components needed for robust petition and assess information gaps
    - Determine whether a petition can advocate two different proposed outcomes, i.e. petitioning to close iPCB exception OR lower it to a specific threshold if EPA determines that eliminating the exception isn’t justifiable/possible.
  - Develop 2-page document outlining petition path
- Draft Federal Outreach Strategy (1.5 month timeline)
  - Outline and power-map key policymakers
    - Develop “call-list” containing names and contacts
  - Administration
    - Meet and/or facilitate meetings with EPA region and headquarters, political and career staffs to gauge position on and understanding of issue
  - Congressional
    - Develop Capitol Hill outreach plan, including potential options for engaging with relevant member and committee offices
    - Propose plan to create language to foster effective Congressional support for petition
  - Network of Support
    - Work with SRRTTF to assess existing allies and potential partners
    - Map other organizations that may be willing to voice support
    - Develop strategy for leveraging stakeholder/grassroots voices in support of eliminating iPCB exception