



November 3, 2023

California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: Support for Electrify America's Cycle 3 Investment Plan

Dear California Air Resources Board Members:

I am writing on behalf of Beyond Compliance LLC in support of Electrify America's Cycle 4 California ZEV Investment Plan. This significant, \$200 million investment in California over 30 months will bring the state closer to achieving its emissions goals to combat climate change and improve air quality by continuing to lead the transition to zero emission transportation, including in transit and heavy-duty applications.

Beyond Compliance is a California-based environmental compliance and consulting firm committed to helping companies maintain compliance and guiding companies to shrink their ecological footprint. We have advised a number of California organizations working with the C-suite to develop 5-and-10-year sustainability plans focused on reducing carbon footprint and electrifying corporate vehicle fleets.

Electrify America has opened 843 ultra-fast charging stations in California in nearly seven years. The Cycle 4 zero emission vehicles (ZEV) Investment Plan will continue to expand access to ZEV in California, by further building out ultra-fast charging infrastructure in metropolitan areas and along highway corridors, supporting transit and medium- and heavy-duty fleet charging, and continuing to invest in brand neutral education and awareness efforts.

Beyond Compliance has leveraged our permitting expertise to support Cycle 2 and Cycle 3 efforts. For the past five years, we have led the permitting efforts supporting Electrify America where we helped unstuck scores of stalled projects while leading more straight forward permitting of other electric vehicle charging projects. We also worked with the Electrify America's legislative and public affairs team and were instrumental in helping craft a new permit streamlining law (AB 970) which has dramatically improved the electric vehicle permitting time frames. We also developed a pre-permitting letter designed to proactively assist the Electrify America team in educating cities and counties to streamline the permitting process beginning at the front end of the process.

We are looking forward to continuing our instrumental role as a partner with Electrify America in permitting many stations as part of Cycle 4.

We respectfully urge you to approve Electrify America's Cycle 4 California ZEV Investment Plan at your December meeting, in order not just to keep California on the forefront of, but a leader in, the fight against climate change.

Respectfully,

A handwritten signature in black ink, appearing to read "Gary Lucks". The signature is fluid and cursive, with the first name "Gary" written in a larger, more prominent script than the last name "Lucks".

Gary A. Lucks JD CPEA
Principal