



May 28, 2021

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 in support of Electrify America's Cycle 3 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 transitioning 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.

The Cycle 3 ZEV Investment Plan will continue to expand access to zero emission vehicles (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. Electrify America has opened 175 ultra-fast charging stations in California through the end of Q1 2021, and the Cycle 3 ZEV Investment Plan proposes an additional ~50 metro and highway charging stations, 35-50 transit and medium duty chargers, and a \$25 million "green city" investment focused on transit and freight charging in Long Beach and Wilmington.

Beyond Compliance has leveraged our permitting expertise to support the Cycle 2 effort. We are proud of our contributions which has led to expediting several stalled EV charging station projects throughout California. We are looking forward to continuing our instrumental role as a partner with Electrify America in permitting many stations as part of Cycle 3.

Electrify America's investments are also creating economic opportunities for many stakeholders throughout California. For example, responding vendors to Electrify America's 2020 survey identified more than 8,000 workers employed by themselves and subcontractors that worked on Electrify America

projects from July to December 2020, including 1,022 workers in California. Of these workers, vendors reported that 62% lived in low-income and disadvantaged communities.^[1]

We respectfully urge you to approve Electrify America's Cycle 3 California ZEV Investment Plan at your June 24th 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

[1] "2020 Annual Report to CARB." April 30, 2021.
<https://media.electrifyamerica.com/assets/documents/original/681-2020ElectrifyAmericaCaliforniaAnnualReportPublic.pdf>