



Cynthia Williams
Global Director
Sustainability, Homologation and Compliance

World Headquarters
One American Road
Dearborn, MI 48126-2701
USA

April 6, 2023

Via Electronic Submission to <https://www.arb.ca.gov/lispub/comm/bclist.php>

Clerk of the Board, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Ford Comments on the Proposed Advanced Clean Fleets Regulation

Dear Chair Randolph and Members of the Board,

Ford Motor Company (Ford) respectfully submits these comments on the California Air Resources Board's proposed Advanced Clean Fleets regulation. Ford supports California's efforts to accelerate the widespread adoption of zero-emission (ZEV) vehicles, and we believe it will provide critical support for the success of the Advanced Clean Trucks regulation. Particularly, we are very interested in the progress of the Advanced Clean Fleets proposed regulation, as we sell more electric vehicles (EV) over 8,500 lbs than any other manufacturer.

As a company, we have committed ourselves to helping the United States lead on climate change and to making the business case for electrification. Ford believes that climate change is a shared global challenge that affects all of us and has supported a wide range of regulatory initiatives that will help address this challenge. Since Fall 2021, Ford and our partners have announced \$17.6 billion in electric vehicle and battery investments in the United States, building out a supply chain that upholds our commitment to care for people and protect the environment. We will invest \$50 billion through 2026 to put EV models on the road worldwide. And we are electrifying our most popular, iconic vehicles, including the Mustang Mach-E, the F-150 Lightning, and the E-Transit line of commercial vehicles. Globally, we are on track to reach an annual production run-rate of 600,000 electric vehicles by the end of 2023, 2 million by late 2026, and EVs will represent half of our volume by 2030.

As outlined above, Ford intends to lead in the electric revolution and is moving as quickly as possible. However, to successfully decarbonize transportation, we believe emission standards must be achievable, gradual, and account for limiting factors including supply chain and EV charging infrastructure. In the Advanced Clean Trucks regulation, Table A-1. ZEV Sales Percentage Schedule

prescribes ZEV sales requirements as follows: 55% for Class 2b&3 Group, 75% for Class 4-8 Group, and 40% for Class 7-8 Group for the 2035 model year and beyond. The Advanced Clean Fleets proposed regulation indicates ZEV sales requirements jump to 100% for all classes in the 2036 model year (the prior target for 100% ZEVs was 2040). Ford does not believe that an increase in ZEV Sales Percentage in a single model year from 40-55% to 100% is feasible. Ford respectfully requests the Advanced Clean Fleets proposed ramp-up schedule for ZEV Sales be reassessed and aligned with the Advanced Clean Trucks regulation.

Additionally, Ford strongly recommends a provision in the regulation for an interim assessment. As the proposed regulation includes a ZEV sales mandate that is projected thirteen years into the future, it would be prudent to include such a review. Predicting the landscape so far into the future is difficult, especially in light of unknowns in the supply chain, charging infrastructure challenges, and consumer adoption. Ford recommends that California assess these external factors and how the entire industry develops solutions for these larger electric trucks, and revisit the ZEV sales percentage requirements well before 2035.

We look forward to finalization of this rule. If you have any questions about the comments, please contact Steve Henderson (shenders@ford.com) or Evan Belser (ebelser1@ford.com). Thank you for your attention to these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Henderson", with a long horizontal flourish extending to the right.

Steve Henderson
Manager, Vehicle Regulatory Strategy & Planning
Sustainability, Homologation and Compliance