

Advanced Clean Fleets (ACF) Regulation Overview – Enforcement, Exemptions, and Extensions

PURPOSE

For Sales and Operations staff to better understand and highlight to customers the key relevant aspects of the ACF regulation, from who is affected to enforcement and exemptions. This document is intended as a summary and is not fully inclusive. This file will be updated as new info becomes available.

Below is the latest information regarding regulatory CARB enforcement actions for high priority fleets which are simply defined as having either \$50M+ in gross annual revenue or manage 50+ vehicles with a GVWR of 8,500+ lbs operated in California. On January 1, 2025, CARB will publish and maintain a ZEV Exemption List with common vehicle body configurations that are not available to purchase as a ZEV or NZEV.

ENFORCEMENT

Taken from the latest source:

[Advance Clean Fleets Regulation Enforcement Notice – Dec 28, 2023](#)

Effective January 1, 2024, CARB is awaiting the EPA's decision to grant preemptive waivers to determine enforcement actions to be taken. Once a waiver is granted or determined to be unnecessary, fleet reporting will be required for vehicles purchased after January 1, 2024. The easiest option for reporting is via a telematics device that collects vehicle GPS data, mileage, and hours of operation.

Additionally, any high priority or federal fleets who add ICE vehicles into service in CA after December 31, 2023, may be restricted from operating once the EPA grants California a waiver. They may need to remove any vehicle from the California fleet that was not eligible to be added to the California fleet after January 1, 2024, or the fleet must elect to comply with the Zero-Emission Vehicle (ZEV) Milestone Option instead of the Model Year Schedule.

For state and local government fleets, CARB will fully enforce all requirements including reporting and the ZEV purchasing requirements or the option to comply with the ZEV Milestone Option beginning January 1, 2024.

EXEMPTIONS & EXTENSIONS

Below is a simple table to show the exemptions available and associated details. An email to TRUCRS@arb.ca.gov starts the application process for

any of these exemptions. The website links provide additional details and information for reporting and qualifiers for each exemption.

<u>ACF Exemptions</u>	<u>Evaluation</u>	<u>Comments</u>
ZEV Purchase Exemption	Manufacturer/Upfitter availability of configuration equivalent ZEV. Starting 2025, CARB will publish and maintain a ZEV Purchase Exemption List with	Apply within one year before the applicable compliance date and prior to the vehicle being replaced reaches 16 years old, or exceeds 700,000

Advanced Clean Fleets (ACF) Regulation Overview – Enforcement, Exemptions, and Extensions

	common vehicle body configurations that are not available to purchase as a ZEV or NZEV.	miles, whichever occurs first. New vehicle must be at least 13 y/o.
<u>Daily Usage Exemption</u>	Mileage or energy usage of available ZEV or NZEV (not Fuel Cell EV's – FCEV)	Apply within one year before the applicable compliance date and prior to the vehicle being replaced reaches 16 years old, or exceeds 700,000 miles, whichever occurs first. New vehicle must be at least 13 y/o.
<u>ZEV Infrastructure Delay Extension</u>	Up to 5 yr (with potential 2 yr extension) temporary compliance extension to address situations where a fleet owner would become non-compliant with the ACF regulation due to infrastructure installation delays for circumstances beyond their control such as, utility cannot supply enough power or construction related.	Owners must apply for the extension 45 days prior to the applicable compliance date and show that the criteria to qualify for the extension has been met
<u>Non-Repairable Vehicle Exemption</u>	Used for a one-time replacement for catastrophic event such as accident or fire. Replacement must be same or newer model yr and milage will be cumulative between both vehicles.	Vehicles in the California fleet must already be reported in the Truck Regulation Upload, Compliance, and Reporting System (TRUCRS).
<u>Vehicle Delivery Delay Extension</u>	For ZEV's ordered for immediate delivery at least one year ahead of the next compliance date, but it doesn't arrive in time to meet their compliance requirements.	Excludes drayage until 2035. Apply at the beginning of the next compliance year.
<u>Backup Vehicle Exemption</u>	Allows a designated backup vehicle that is operated less than 1,000 total miles per calendar year to be excluded from the applicable ZEV requirements.	Designate a backup vehicle and report its odometer reading at the beginning of the compliance year by reporting in the Truck Regulation Upload, Compliance and Reporting System (TRUCRS) during the annual open reporting period.
<u>Declared Emergency Response Exemption</u>	Temporary exemption from the requirements of the Advanced Clean Fleets regulation for the duration of the emergency event. Applies to vehicles dispatched by a local, state, federal, or other responsible emergency management agency or its contractors to support a declared emergency event	Owners may exclude vehicles that are performing emergency operations from the Model Year Schedule and Zero-emission Vehicle Milestones Option requirements during a declared emergency event.

Advanced Clean Fleets (ACF) Regulation Overview – Enforcement, Exemptions, and Extensions

<u>Snow Removal Vehicle Exemptions</u>	Exclude an intermittent snow removal vehicle from the California fleet without affecting compliance until 2030.	Owners must report intermittent snow removal vehicles in the Truck Regulation Upload, Compliance and Reporting System (TRUCRS) like any other truck, and select “None” as the compliance option.
<u>Waste and Wastewater Fleet Option</u>	Allows certain waste and wastewater fleets to delay compliance of eligible vehicles by shifting them from Milestone Groups 1 and 2 into Group 3.	Eligible waste fleet includes vehicles owned and operated by an entity that is contracted with a municipality that is mandated to support the hauling, transfer, and processing of diverted in-state organic waste to produce biomethane via franchise agreement or long-term contract, with either a minimum length of ten years or more, or with a minimum length of three years but includes a renewal provision when satisfying the contract terms.
Rental Vehicle Option*	A vehicle rental company has the option to comply by reporting the average number of rental trucks operating in California rather than reporting every truck that operates in California during the compliance year. The average is based on quarterly rental vehicle snapshots when reporting.	Applies when complying with the ZEV Milestones Option.
Mutual Aid Assistance Exemption*	Vehicles to help others during a declared emergency event. Owners can exclude up to 25% of the fleet from the ZEV requirements.	Does not apply to pickup trucks, buses, box trucks, vans, tractors, vehicles available as ZEVs with fast mobile fueling/charging, nor NZEVs
5-Day Pass*	Approved pass allows the vehicle to enter California for a consecutive 5-day period without becoming part of the California fleet	Owners can apply for a 5-day pass once per vehicle each year

* If no link is listed above, the following page provides an overview of all exemptions available: [Exemptions and Extensions Overview](#)