



FAQ: “High Priority and Federal Fleets” (HPFF) Requirements under ACF

Who is subject to the HPFF provision¹?

Entities which operate medium- and heavy-duty vehicles in California that meet the following thresholds:

- Fleets that own, operate, or direct the operation of 50 or more vehicles in the total fleet, excluding light-duty package delivery vehicles, or
- An entity that has \$50 million or more in total gross annual revenues reported to the United States Internal Revenue Service, or
- Fleet owners or a controlling party whose fleet in combination with other fleets operated under common ownership and control totals 50 or more vehicles in the total fleet, excluding light-duty package delivery vehicles, or
- Any federal government agency fleet, or
- Any state or local government agency fleet that elects to comply with the “ZEV Milestones Option.”
- Hiring Entities that include any motor carrier, broker, governmental agency, person, or entity that hires and operates or hires and directs the operation of vehicles in California.²

What types of vehicles are covered?

Vehicles operated in California that have a gross vehicle weight rating (GVWR) greater than 8,500 lbs., are light-duty package delivery vehicles, or are yard tractors. There are limited exemptions:

- School buses
- Military tactical vehicles
- Vehicles awaiting sale
- Emergency vehicles
- Historical vehicles
- Dedicated snow removal vehicles
- Two-engine vehicles
- Heavy cranes
- Vehicles in a test fleet
- Vehicles subject to the regulation for Mobile Cargo Handling Equipment at Ports and Intermodal Rail Yards.

How do I comply under the HPFF provision?

There are two compliance pathways under the High Priority and Federal Fleets provision:

- **Model Year Schedule (default compliance path)**
 - Beginning January 1, 2024, any vehicle added to your California fleet must be a ZEV or near-zero emission vehicle (NZEV).

¹ Transit vehicles subject to the Innovative Clean Transit regulation commencing with title 13, CCR section 2023 are exempt from the regulation.

² Hiring entities that are subject to this regulation must follow the requirements found in [Section 2015\(g\)](#) of the “High Priority and Federal Fleet” requirements.

- For existing Internal Combustion Engine (ICE) vehicles, beginning January 1, 2025, ICE vehicles must be removed from your California fleet by January 1 of the calendar year after the minimum useful life mileage threshold is exceeded, or January 1 of the calendar year the engine model year is 18 years old or older, whichever occurs first.
- **ZEV Milestones Option (opt-in compliance path)**
 - Beginning January 1, 2025, fleet owners must continuously meet or exceed the ZEV Fleet Milestone percentage requirements set forth below in Table A below.
 - The compliance requirement can be met with any mix of ZEV trucks within the Milestone Group.
 - Any fleet utilizing this option must waive their Useful Life protections provided under state law, known as “SB 1 protections.”

Table A: ZEV Fleet Milestones by Milestone Group and Year

Percentage of vehicles that must be ZEVs	10%	25%	50%	75%	100%
Milestone Group 1: Box trucks, vans, buses with two axles, yard tractors, light-duty package delivery vehicles	2025	2028	2031	2033	2035 and beyond
Milestone Group 2: Work trucks, day cab tractors, pickup trucks, buses with three axles	2027	2030	2033	2036	2039 and beyond
Milestone Group 3: Sleeper cab tractors and specialty vehicles	2030	2033	2036	2039	2042 and beyond

Source: California Air Resources Board

What is the “Waste and Wastewater Fleet Option”?

Waste³ and wastewater⁴ fleet owners that meet the following criteria will be categorized into Group 3 of the “ZEV Milestones Option” for those vehicles in their California fleets as of January 1, 2024⁵. This provides fleets who do not fall under the “specialty vehicle” definition in Section 2015(b) additional time to comply with the ZEV purchase requirement.

- Must be fueled exclusively with biomethane.
- Eligible garbage vehicle configurations are rear-, side-, and front-loader compactor trucks, tractors exclusively used as transfer trucks, and roll-off trucks.
- Eligible wastewater vehicle configurations are all vehicles that directly support the operation of facilities that collect and process diverted in-state organic waste to produce biomethane.

What exemptions/extensions are offered under the HPPF provision?

There are several vehicle purchase exemptions and infrastructure delay extensions offered under the High Priority and Federal Fleets provision. They include:

³ A “Waste fleet” is defined as the vehicles owned and operated by a fleet owner 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.

⁴ A “Wastewater fleet” is defined as the vehicles owned and operated by a government agency or subdivision that owns and operates a wastewater treatment facility, and the agency’s primary purpose is the collection, treatment, and recycling of wastewater and biosolids.

⁵ HPPF Section 2015.2(e)(6)

Exemptions:

- **Backup Vehicle Exemption.** You may designate one vehicle as a backup vehicle during the January reporting period annually if the following criteria are satisfied:
 - The vehicle is operated less than 1,000 miles a year, excluding miles driven under contract during a declared emergency event, and
 - The fleet must report the vehicle as a backup vehicle and must submit odometer readings.

- **Daily Usage Exemption.** You may request an exemption to purchase a new internal combustion engine (ICE) of the same configuration as an ICE vehicle being replaced if no battery electric vehicle (BEV) is available for purchase that can meet the demonstrated daily usage needs of any existing vehicles of the same configuration within the fleet. If approved, you must place the order for the new ICE vehicle within 180 calendar days from the date in which the exemption was granted. You may use this exemption only if at least 10% of your California fleet is comprised of ZEVs or NZEVs⁶.

- **ZEV Purchase Exemption.** You may request exemptions to purchase a new ICE vehicle if a needed configuration is not available to purchase in ZEV or NZEV under either the ZEV Purchase Exemption List or the ZEV Purchase Exemption Application.
 - **ZEV Purchase Exemption List**
 - The Executive Officer will establish and maintain a list of vehicle configurations no later than January 1, 2025 at the following link: [CARB Advanced Clean Fleets](#)
 - **ZEV Purchase Exemption Application**
 - If approved, you must place the new ICE vehicle orders within 180 days from the date the exemption is granted.

- **Exemptions Pursuant to Declared Emergency Event:**
 - **Declared Emergency Response.** Any vehicle dispatched by a local, state, federal or other responsible emergency management agency or its contractors to support a declared emergency event shall be exempt from the ZEV purchase requirement for the duration of the emergency event.
 - **Mutual Aid Assistance.** Fleet owners may obtain an exemption from the ZEV purchase requirement to purchase a new ICE vehicle if the fleet owners have a mutual aid agreement to send vehicles to assist other entities during a declared emergency event and the California fleet is comprised of a specified number of ZEVs at the time of the requested exemption. ICE vehicles purchased under the exemption are not restricted solely to mutual aid functions. This exemption excludes pickup trucks, buses, box trucks, vans, tractors, or any vehicle configurations that can be purchased as NZEV.

Extensions:

- **ZEV Infrastructure Delay Extensions.** You must request the following extensions at least 45 days prior to the next applicable compliance date for CARB to consider the request.

⁶ NZEVs (near zero-emission vehicles) are plug-in hybrids with minimum all electric range.

- **ZEV Infrastructure Construction Delays**
 - May request an extension of up to 2 years if you experience construction delays beyond your control.
- **ZEV Infrastructure Site Electrification Delays**
 - Until January 1, 2030, you may request an extension if the electric utility provider determines it cannot provide the requested power to the site where ZEVs will be charged or refueled before the fleet's next ZEV compliance deadline.
 - You may request an initial extension of up to 3 years from the applicable compliance date, based on the amount of time the utility determines it needs to supply the needed power to the site.
 - You may request an additional 2 years if the utility still cannot supply the needed power by the end of any granted initial extension period.
- **Vehicle Delivery Delay Extension.** You may request an extension to delay removing your ICE vehicle from the fleet if you placed an order for a ZEV prior to the next applicable compliance date and the ZEV cannot be delivered to you by that date due to circumstances beyond your control.

Are there reporting and recordkeeping requirements?

- Beginning January 1, 2024, fleet owners must meet the applicable reporting and recordkeeping requirements specified in sections 2015.4 and 2015.5, respectively, of the regulation.
- Fleets are required to submit annual compliance reports beginning February 1, 2024 until February 1, 2045. Reports must be submitted through the online [CARB Advanced Clean Fleets](#) in the TRUCRS reporting system unless otherwise specified.
- Fleets must keep the required reporting records and documentation for at least five years⁷. Fleet owners must make such records available in an electronic or paper format upon request or make them available to CARB staff within 72 hours of a written or verbal request for audit.

⁷ High Priority and Federal Fleet section 2015.5