



California State Association of Counties



What are the Advanced Clean Fleets Regulations?

The California Air Resources Board's (CARB) Advanced Clean Fleets (ACF) regulations became effective in January 2024 and require all public fleet owners to begin purchasing Zero-Emission (ZEV) medium and heavy-duty vehicles when acquiring vehicles for their fleets. The regulations also require medium and heavy-duty vehicle manufacturers to exclusively manufacture ZEV vehicles for sale in California by 2036. The most common types of compliant ZEVs utilize either battery-electric components or hydrogen fuel cell technology. In 2025 action at the federal level limited the applicability of the ACF to state and local government fleets. The ACF regulations offer two options for compliance:

Purchase Option:

Beginning in 2024, fleet managers must ensure that 50% of their medium & heavy-duty vehicle (vehicles with a Gross Vehicle Weight Rating of 8,500 lbs. and above) purchases are ZEVs. This percentage escalates to 100% for all medium & heavy-duty vehicle purchases in 2030. Beginning January 2030, counties with 10 or fewer impacted vehicles as well as fleets in 25 low-population counties must ensure 100% of their vehicle purchases are ZEVs.¹

Fleet Percentage Option:

Alternatively, state and local government fleet owners may opt-in to the ZEV Milestones Option and meet zero-emissions vehicle(ZEV) targets as a percentage of their California fleet. This option allows for phasing ZEVs into the fleet between 2025 and 2042, depending on the type of vehicle and its usage. Additional details on this option can be provided [here](#).

Why?

CARB drafted the regulations to further the Governor's climate goals outlined in [Executive Order N-79-20](#). The ACF regulations are intended by CARB to fully transition medium and heavy-duty vehicle fleets to zero-emissions technology by 2045 to cut air pollution, protect public health and accelerate the transition to clean vehicles. The ACF adds to [California's Advanced Clean Trucks rule](#), which requires manufacturers to accelerate sales of new zero emission heavy-duty trucks by 2035. The two regulations are meant to work in tandem to achieve CARB's goal of drastically cutting air pollution from medium and heavy-duty truck emissions. Action by Congress in June 2025 eliminated CARB's ability to impose the Advanced Clean Trucks rule and significantly limited the impact of the ACF.

Who needs to comply?

Initially, the ACF applied to public and private vehicle fleets that met specific requirements. However, action at the federal level removed CARB's ability to apply the ACF to any private fleets. Now, the regulation only applies to:

Public fleets

Defined as fleets owned by state and local government agencies that own, lease, or operate medium- and heavy-duty trucks.

[1] CARB has designated the following as low population counties: Alpine, Amador, Butte, Calaveras, Colusa, Del Norte, Glenn, Humboldt, Inyo, Lake, Lassen, Mariposa, Mendocino, Modoc, Mono, Nevada, Plumas, Shasta, Sierra, Siskiyou, Sutter, Tehama, Trinity, Tuolumne, and Yuba.

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County Challenges

CSAC surveyed county public works directors and county fleet managers (see Attachment Three) to understand the promises and challenges the ACF regulations create. Based on survey responses, county staff have identified the following challenges they will face to comply with the ACF regulations:



Infrastructure Needs

One of the top concerns for ACF implementation is regarding challenges related to acquiring the electrical infrastructure needed (i.e. Recharging capabilities & Electrical utility delays) to charge medium & heavy-duty ZEVs. Additionally, nearly all counties face costs and timeline challenges working with their local electrical utilities to acquire transformers and other equipment needed to improve electrical capacity of their local grid to support ZEV charging equipment.



Cost and Affordability

Available information indicates that battery electric medium and heavy-duty ZEVs are inherently more costly. For example, a state agency noted that replacing one of their current diesel-powered medium duty sweepers with a battery electric ZEV sweeper was over twice as expensive. Additionally, county fleet managers indicated that they would need to purchase 2-3 battery electric medium or heavy-duty vehicles to replace the duty cycle capabilities of one internal combustion engine.



Workforce

The lack of staff capacity to service and repair ZEVs requires additional consideration. Currently, county fleets rely on trained service workers to maintain and repair their existing fleet of vehicles. Switching vehicle modes of power, specifically gas/diesel to electric or hydrogen, presents an entirely different set of technical skills. This will require counties to retrain many of existing technicians and hire ZEV trained technicians to ensure they are able to maintain these vehicles. There is already a shortage of EV trained automotive technicians worldwide, which will limit counties' ability to hire these personnel. This is further compounded by the difficulties that all levels of government, including counties, have had for filling existing positions across all departments.

County Solutions for Successful Implementation

Additional implementation time and funding is needed for successful implementation of ACF. Also, the ambitious timelines for ACF implementation as well as the clear lack of suitable ZEVs to meet county fleet duty requirements supports the need for additional vehicle exemptions beyond what is currently provided for in the ACF regulations.

CARB should enhance and expand the technical assistance and educational resources to counties and local governments to support this program. Finally, although supplier pricing caps are likely outside of CARB's authority to impose, the Board should periodically review and update its implementation cost analyses to consider utility related costs as well as ZEV purchase and maintenance expenses. CSAC will continue to advocate on behalf of counties to receive the resources and flexibility they need to comply with this regulation.

Resources



["Advanced Clean Fleets" California Air Resources Board](#)



["Understanding California's Advanced Clean Fleet Regulation" RMI](#)



["California Facing Electrical Transformer Troubles as New Homes Continue to be Built" CBS News](#)



["EV Broken? Finding a technician to fix it may take a while" Reuters](#)



["Local Governments Search for Answers to Hiring Challenges" Governing](#)



["Advanced Clean Fleets Survey Results" California State Association of Counties](#)