

**Frequently Asked Questions**  
**Regulation for In-Use Off-Road Diesel-Fueled Fleets**  
**(Off-Road Regulation)**

**Low-Use Provisions**  
**Revised 2025**

Amendments to the Off-Road Regulation approved by the Board in 2022 made changes to the low-use provision, including: the sunset of year-by-year low-use on January 1, 2024; changes to the three-year rolling average; and additional hour meter reporting requirements. In effect, beginning January 1, 2024, a vehicle operated only in California for three consecutive years and owned by the same owner during that entire period may be considered permanent low-use if it is operated an average of 200 or fewer hours per year during that consecutive three-year period and meets the applicable reporting requirements.

For vehicles that fleet owners intend to use the three-year rolling average definition of permanent low-use, fleets must report two hour meter readings: one taken within 30 days of January 1 of the first year and one taken within 30 days of December 31 of each year during the three-year period. Hour meter replacements must be reported to CARB during the following engine hour reporting period. As of January 1, 2036, vehicles with a Tier 0 engine or a model year 1994 or earlier on-road engine may no longer be operated in California, even if they are designated permanent low-use.

**Q - What if I have vehicles that I do not use very much or that I could get by with using only very little?**

A - The regulation contains special provisions for low-use vehicles. Although low-use vehicles must still be reported and labeled, they do not count towards a fleet's total horsepower and are not included in the portion of a fleet that must meet the fleet average target rates. In other words, claiming vehicles as low-use can be a very useful way for some fleets to reduce their compliance obligations under the Off-Road Regulation. As of January 1, 2036, vehicles with a Tier 0 engine or a model year 1994 or earlier on-road engine may no longer be operated in California, even if they are designated permanent low-use.

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**Q - What is considered a permanent low-use vehicle?**

A - Permanent low-use vehicles are vehicles used less than 200 hours per year, or 600 hours or less over a three-year rolling average. For a vehicle to be considered low-use, the owner must have a non-resettable hour meter installed on the vehicle and report the annual hour meter readings to CARB.

**Q - When and how should I permanently designate vehicles as low-use?**

A - If you need BACT credits to meet the compliance requirements, the fleet owner can designate a vehicle as permanent low-use which permanently limits the vehicle's hours of use to less than 200 hours in any future year (the vehicle did not have to be used under 200 hours in the current or previous compliance years). Beginning 2014 for large fleets, 2017 for medium fleets, and 2019 for small fleets, a fleet is able to claim BACT credit in the amount of the vehicle's maximum horsepower for vehicles designated as low-use.<sup>1</sup> BACT credit will only be awarded for a vehicle that meets the order of BACT requirements and is designated as permanently low-use no earlier than January 1, 2013, for a large fleet; January 1, 2016, for a medium fleet; and January 1, 2018, for a small fleet.

For more information on the order of BACT requirements, please see the Order of BACT FAQ available online in the [Off-Road Zone](http://www.arb.ca.gov/offroadzone) at [www.arb.ca.gov/offroadzone](http://www.arb.ca.gov/offroadzone).

To obtain the permanent low-use designation, the fleet is required to restrict the vehicle's use to either less than 200 hours per year or 600 hours within a three-year rolling average, and to report the hour meter readings each year. If restricting hours by year, the fleet must report one engine hour meter reading that is taken within 30 days of January 1 of the current year. For each year thereafter, the fleet owner must report the engine hour meter reading that is

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<sup>1</sup> BACT carryover credit earned in years prior to the final target date cannot be used to meet compliance after the final target date. BACT carryover credit earned after the final target date can be used in subsequent years to meet the BACT requirements in section 2449.1(b).

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taken within 30 days of December 31 of the prior year. If the fleet is choosing to follow the three-year rolling average, they need to take report two hour meter readings: one engine hour meter reading taken within 30 days of January 1 of the first year and one that is taken within 30 days of December 31 of the third year.

Exceeding the 200-hours per year limit may result in enforcement action. The low-use vehicle may be added back to the active fleet only if it meets the regulation's adding vehicles requirements. In addition, when removing the permanent low-use designation, the fleet must forfeit any BACT credit earned by the vehicle for the permanent low-use designation. As of January 1, 2036, vehicles with a Tier 0 engine or a model year 1994 or earlier on-road engine may no longer be operated in California, even if they are designated permanent low-use.

For more information on the adding vehicle requirements, please see the Adding Vehicles FAQ available online in the [Off-Road Zone](http://www.arb.ca.gov/offroadzone) at [www.arb.ca.gov/offroadzone](http://www.arb.ca.gov/offroadzone).

**Q - What if I permanently designate a vehicle low-use that was previously a year-by-year low-use vehicle?**

A - The previous year-by-year low-use designation is no longer available. Vehicles previously designated as year-by-year low-use must be added back into the fleet subject to the adding vehicles requirements or designated as permanent low-use. Vehicles designated as year-by-year low-use are exempt from the performance requirements of the regulation and cannot generate BACT credits. In contrast, vehicles designated as permanent low-use can receive BACT credits to meet compliance requirements. Therefore, to receive BACT credit for permanently designating a vehicle as low-use, the fleet must first remove the vehicle's year-by-year low-use status. Once the vehicle's low-use status has been removed, as part of the next annual reporting date, the fleet may designate the vehicle as permanent low-use and receive BACT credit for that vehicle.

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**Q - What if I retire a permanent low-use vehicle?**

A - If a fleet retires a vehicle that was permanently designated low-use, the fleet will not receive additional credit towards the BACT requirements.

**Q - What if I have vehicles used partially inside and partially outside of California?**

A - If you operate a vehicle both inside and outside of California, you may use only the hours that it is operated inside California to determine if the vehicle is permanent low-use. For instance, if a fleet uses a vehicle 199 hours inside California in one year, 2000 hours in Nevada, and another 1000 hours in Oregon in the same year, the vehicle will meet the permanent low-use requirements for that year. The vehicle will be reported as “Permanent Low-U-se Outside”, and only the hours of use inside California will be reported in that year. Additionally, the vehicle owner must also log and report the date and hour meter reading each time the vehicle entered and left the state. The reporting form: “Low-Use Vehicles Operated Inside and Outside of California” is available online in the [Off-Road Zone](http://www.arb.ca.gov/offroadzone) at [www.arb.ca.gov/offroadzone](http://www.arb.ca.gov/offroadzone).

**Q - What about vehicles used partially for emergency services?**

A - If you use a permanent low-use vehicle for emergency services (e.g., fighting or controlling a wildfire), those hours do not count towards the vehicle’s annual hours of use, but still need to be documented. For example, if a vehicle was used 245 hours total in one year, including 50 hours to help fight wildfires, that vehicle would meet the permanent low-use requirements for that year. The vehicle owner would need to log the hour meter readings during general

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services (non-emergency use), report those readings as the vehicle's hours of use in that year, and keep a record of the logs of emergency services.

**Q - Can a two-engine vehicle subject to the off-road regulation be considered a permanent low-use vehicle if only one engine is low-use? For example, what if the lower (carrier) engine is used less than 200 hours per year, but the upper engine is used more often?**

A - No. In order to be considered a permanent low-use vehicle, both engines of a two-engine vehicle must meet the requirements of the low-use provisions individually. For example, if the upper engine on a two-engine crane operated for 190 hours in a year, and the lower engine was also operated for 190 hours in that year, that two-engine crane could be considered a permanent low-use vehicle.

**Q - If I designate a vehicle as permanent low-use, but I don't report engine hour meter readings, is my vehicle still considered permanent low-use?**

A - A vehicle's permanent low-use status can only be confirmed through reported engine hour meter readings. While a fleet may designate a vehicle as permanent low-use in DOORS without reporting engine hour meter readings, the engine hour meter readings must be submitted as part of the fleet's annual reporting requirements. These readings must be taken either within 30 days of January 1 of the first year after the status designation or within 30 days of December 31 of each year during the three-year period, however, they do not have to be reported until March 1<sup>st</sup> of each year per the annual reporting requirements. Large fleets are required to submit engine hour meter readings for each vehicle designated as permanent low-use beginning in 2012, and medium fleets beginning in 2016, and small fleets beginning 2018. Vehicles designated as permanent low-use in DOORS will be removed from the fleet average, BACT requirement, and fleet size calculations.

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**Q - What if my non-resettable engine hour meter breaks or becomes unreadable?**

A - A broken or unreadable non-resettable engine hour meter must be immediately removed and replaced with a new, operational non-resettable hour meter, and accurate records must be kept of the meter's failure and replacement. When reporting the updated hour information in DOORS, you will add the newly installed hour meter's reading as the end of the year reading for the old meter (at the time it broke or became unreadable) and then report the new hour meter's readings for all subsequent required reporting.

If a vehicle's hour meter on a low-use designation vehicle is replaced or altered in any way, the respective fleet must notify CARB of the replacement during the following reporting period and must continue to comply with all low-use hour reporting requirements. For additional information, please see the DOORS user guide for Reporting Low-Use Vehicles available online in the [Off-Road Zone](http://www.arb.ca.gov/offroadzone) at [www.arb.ca.gov/offroadzone](http://www.arb.ca.gov/offroadzone).

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