



## REGION 9

SAN FRANCISCO, CA 94105

May 6, 2026

Matthew Lakin  
Division Chief, Air Quality Planning and Science Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Dear Division Chief Lakin,

Thank you for your letter dated March 25, 2026, requesting U.S. Environmental Protection Agency (EPA) approval of Emission FACTor (EMFAC) off-model adjustment factors that account for the estimated emission benefits attributed to California's Heavy-Duty Inspection and Maintenance Regulation ("HD I/M Regulation"), also known as California's Clean Truck Check (CTC) regulation. Through this letter, the EPA approves these HD I/M adjustment factors for use in Clean Air Act (CAA) State Implementation Plan (SIP) development and transportation conformity determinations in California. These EMFAC HD I/M off-model adjustment factors are multipliers that will be applied to criteria pollutant emissions estimates resulting from the currently approved version of EMFAC, which is EMFAC2021 with the November 21, 2025 adjustment factors.<sup>1</sup> The EMFAC2021 interim HD I/M off-model adjustment factors previously approved in May 2023 will no longer be used in CAA SIP development and transportation conformity analyses.<sup>2</sup>

The California Air Resources Board (CARB) approved the HD I/M Regulation in December 2021, and the regulation went into effect on January 1, 2023. CARB submitted the HD I/M Regulation as a revision to the California SIP on December 14, 2022.<sup>3</sup> On February 6, 2026, the EPA took final action to partially approve the HD I/M Regulation into the California SIP with respect to vehicles registered in-state, and to partially disapprove the regulation to the extent that it purports to apply to vehicles registered out of state.<sup>4</sup>

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<sup>1</sup> 87 FR 68483 (Nov. 15, 2022) (EPA approval and notice of availability for EMFAC2021). The approved version of EMFAC is EMFAC2021 with the November 21, 2025, adjustment factors. See the "[Use of EMFAC model in California](#)" section of the EPA's "Policy and Technical Guidance for State and Local Transportation" website for links to both the November 2025 letter and the *Federal Register* notice approving EMFAC2021 (<https://www.epa.gov/state-and-local-transportation/policy-and-technical-guidance-state-and-local-transportation#emfac>).

<sup>2</sup> Letter dated May 26, 2023, from Elizabeth Adams, Director, Air and Radiation Division, EPA Region IX to Michael Benjamin, Division Chief, Air Quality Planning and Science Division, CARB.

<sup>3</sup> Letter (with enclosures) dated December 7, 2022, from Steven S. Cliff, Ph.D., Executive Officer, CARB, to Martha Guzman, Regional Administrator, EPA Region IX (submitted electronically December 14, 2022).

<sup>4</sup> 91 FR 5325 (Feb. 6, 2026).

The submitted EMFAC2021 off-model adjustment factors described in this letter account for estimated emission reductions attributed to the HD I/M Regulation with respect to vehicles registered in California and do not account for emission reductions attributed to vehicles registered out of state, per the February 6, 2026, final rule. With respect to transportation conformity, the EPA approves these adjustment factors for transportation plan and transportation improvement program (TIP) conformity determinations and CO, PM<sub>10</sub>, and PM<sub>2.5</sub> hot-spot analyses for project-level conformity determinations. Under 40 CFR 93.122(a)(3)(ii), emission reductions from a regulation can be included in a transportation conformity regional emissions analysis if the regulation has been adopted into the applicable SIP.

The approved model version of EMFAC is EMFAC2021 with the November 21, 2025, adjustment factors. Therefore, the submitted off-model adjustment factors described in this letter may only be used after the November 2025 EMFAC2021 off-model adjustment factors<sup>5</sup> are applied to EMFAC2021 emissions estimates.<sup>6</sup>

The EPA previously approved “interim” EMFAC2021 adjustment factors for the HD I/M Regulation, providing 50 percent of the then-assumed program reductions for transportation plan/TIP conformity determinations, in May 2023. Through the EPA’s approval in this letter, the new HD I/M adjustment factors replace the interim adjustment factors the Agency approved in May 2023, meaning that the May 2023 factors can no longer be used for transportation conformity determinations.

If you have any questions, please contact me at (415) 231-4710 and [lee.anita@epa.gov](mailto:lee.anita@epa.gov), or Karina O’Connor at (415) 725-8713 and [oconnor.karina@epa.gov](mailto:oconnor.karina@epa.gov).

Sincerely,

Anita Lee  
Acting Director, Air and Radiation Division

cc: David Quiros, California Air Resources Board  
Nesamani Kalandiyur, California Air Resources Board  
Sara Forestieri, California Air Resources Board  
Carey Knecht, California Air Resources Board  
Ariel Fidely, California Air Resources Board  
Elissa Konove, Federal Highway Administration  
Antonio Johnson, Federal Highway Administration  
Ray Tellis, Federal Transit Administration

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<sup>5</sup> Approved via letter (with enclosures) dated November 21, 2025, from Anita Lee, Acting Director, Air and Radiation Division, EPA Region IX, to Edie Chang, Deputy Executive Officer, CARB.

<sup>6</sup> For more information regarding application of EMFAC2021 off-model adjustment factors, see Attachment B, section V, to CARB’s March 25, 2026, letter.