

September 23, 2026

Mike Martucci
Acting Regional Administrator
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105

Re: 2026 State Implementation Plan Revisions for the California Extreme Ozone
Nonattainment Areas

Dear Administrator Martucci,

The California Air Resources Board (CARB) is submitting to the U.S. Environmental Protection Agency (U.S. EPA) for inclusion into the California state implementation plan (SIP) the *2026 State Implementation Plan Revisions for the California Extreme Ozone Nonattainment Areas* (2026 Extreme Ozone SIP Revision). The 2026 Extreme Ozone SIP Revision revises measure commitments originally included in the 2022 State Strategy for the State Implementation Plan (2022 State SIP Strategy) and the commitments to achieve emissions reductions for the three extreme nonattainment areas in California for the 70 parts per billion 8-hour ozone standard (ozone standard). In addition to revising the commitments, the 2026 Extreme Ozone SIP Revision revises the planning emissions inventories, reasonable further progress demonstrations, and motor vehicle emission budgets (budgets) for these nonattainment areas.

CARB adopted the 2022 State SIP Strategy on September 22, 2022. The 2022 State SIP Strategy described CARB's roadmap for reducing emissions from State sources as needed to support attainment of the ozone standard. The 2022 State SIP Strategy included commitments to develop control measures and reduce emissions from State-regulated sources as needed to support attainment. The 2022 State SIP Strategy measures and commitments were incorporated into regional attainment plans submitted to U.S. EPA in 2023 and 2024. U.S. EPA has not yet acted on these SIP submittals. The attainment plans for the ozone standard included modeled attainment demonstrations that accounted for the emissions reductions from regulations already adopted and in place, as well as emissions reductions from CARB commitments to pursue specified measures in the 2016 and 2022 State SIP Strategies, including a subset for which approval was requested pursuant to section 182(e)(5) of the Clean Air Act.

A significant component of the 2022 State SIP Strategy was CARB measures targeting emissions from mobile sources. In the last 18 months, the current federal administration has taken several actions that called into question California's ability to credit emissions reductions from certain key mobile source regulations. Since U.S. EPA has not acted on the

attainment plans for the ozone standard or the 2022 State SIP Strategy, CARB revised the extreme nonattainment area plans to reflect recent adverse federal actions. The 2026 Extreme Ozone SIP Revision revises the 2022 State SIP Strategy measure commitments, aggregate emissions reduction commitments, and other elements as needed for the extreme nonattainment areas. The 2026 Extreme Ozone SIP Revision supports the approval of the attainment plans currently awaiting U.S. EPA action. The Board adopted the 2026 Extreme Ozone SIP Revision on July 23, 2026.

This 2026 Extreme Ozone SIP Revision submittal package consists of the following documents:

1. *2026 State Implementation Plan for the California Extreme Ozone Nonattainment Areas*;
2. CARB Resolution 26-5;
3. Executive Order S-26-006, *2026 State Implementation Plan Revision for the San Joaquin Valley Extreme Ozone Nonattainment Area Pursuant to Section 182(e)(5) of the Clean Air Act*, with Attachment A;
4. Notice of July 23, 2026 CARB hearing, dated June 11, 2026;
5. Transcripts of the July 23, 2026 CARB hearing;
6. Public Comments received by the California Air Resources Board;
7. SIP Completeness Checklist for San Joaquin Valley; and
8. SIP Completeness Checklist for South Coast and Coachella Valley.

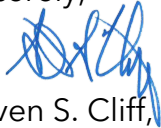
The budgets included in the 2026 Extreme Ozone SIP Revision were developed using the EMFAC2021 model. To ensure that any future updates to these budgets are used expeditiously in the conformity process, we request that the U.S. EPA allow budgets to be replaced upon a finding of adequacy. To accomplish this, we ask that the U.S. EPA limit its approval of the budgets submitted today to last only until the effective date of future U.S. EPA adequacy findings for replacement budgets. This is needed as the newest model developed by CARB, EMFAC2025, is expected to estimate higher emissions for certain categories and areas of the state. We anticipate updating the budgets using the latest EMFAC2025 model after EMFAC2025 is approved.

Without the ability to replace the applicable budgets with submitted budgets found adequate using the budget adequacy process, the benefits of using the updated data may not be realized for a year or more after SIP revisions are submitted, due to the state implementation plan approval process. We appreciate U.S. EPA's willingness to work with us in our efforts to utilize budgets based on the most-up-to-date, accurate data as soon as possible upon availability.

CARB is committed to working with U.S. EPA staff to provide any additional clarifying information needed. If you have

any questions, please contact [Edie Chang](#), Deputy Executive Officer, at (916) 445-4383, or have your staff contact [Matthew Lakin](#), Chief, Air Quality Planning and Science Division, at (916) 712-7965.

Sincerely,



Steven S. Cliff, Ph.D., Executive Officer

Enclosures (6)

cc: (with enclosures)

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