

October 31, 2025

Michelle Angelich
Acting Director, Air and Radiation Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105
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Dear Michelle Angelich:

On June 12, 2025, three Congressional Resolutions purported to disapprove U.S. EPA's decisions to grant California waivers for multiple regulations. Many of these regulations were reflected in the baseline of the on-road emissions inventory model Emission FACTors (EMFAC) model version EMFAC2021, which is the latest approved model for transportation conformity in California. While California is contesting these illegal actions, the California Air Resources Board (CARB or Board) is providing to the Environmental Protection Agency (EPA) off-model adjustment factors that remove the emissions benefits of California's Advanced Clean Trucks (ACT), Zero-Emission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and Heavy-Duty Omnibus (Omnibus) regulations from EMFAC2021.

CARB is seeking EPA's approval of the enclosed off-model adjustment factors for the sole purposes of State Implementation Plan (SIP) development and conformity determinations, including regional emissions analysis for transportation plan and transportation improvement program conformity determinations, as well as hot-spot analysis for project-level conformity determinations. Again, California is contesting the purported disapproval of waivers for these critical mobile source programs that protect public health in California; this limited submission of off-model adjustment factors should not be construed as contravening any position asserted in that litigation. Rather, we are submitting the attached off-model adjustment factors as the first step toward reestablishing a pathway for California to continue to meet federal air quality planning and conformity requirements.

If you have any questions or need further information, please contact Dr. David Quiros, Chief, Mobile Source Analysis Branch by email at David.Quiros@arb.ca.gov or by phone at (916) 264-9378.

Sincerely,



Edie Chang, Deputy Executive Officer

Enclosures