

March 25, 2026

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Acting Director, Air and Radiation Division  
U.S. Environmental Protection Agency, Region 9  
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Dear Acting Director Lee:

With this letter, the California Air Resources Board (CARB) is providing the Environmental Protection Agency (EPA) with the enclosed Emission FACTor (EMFAC) off-model adjustment factors that account for the emission benefits of California's Clean Truck Check Program (CTC), also known as Heavy-Duty Vehicle Inspection and Maintenance Program. CARB is seeking EPA's approval of these off-model adjustment factors for use in State Implementation Plan (SIP) development and transportation conformity determinations, including regional emissions analyses for transportation plan and transportation improvement program conformity determinations, as well as hot-spot analyses for project-level conformity determinations. These CTC off-model adjustment factors would be used with EMFAC2021, which is the approved version of EMFAC, with the November 21, 2025 adjustment factors applied.<sup>1</sup> The CTC off-model adjustment factors would supplant the "Heavy-Duty I/M Program Interim Adjustment Factors" that EPA approved on May 25, 2023.

Following CARB adoption of CTC in Board Resolution 21-29 in December 2021, the California Office of Administrative Law (OAL) approved CTC with an effective date of January 1, 2023. The emissions benefits of CTC (reduced oxides of nitrogen (NOx) and particulate matter (PM)) are not included in the EMFAC2021 model because CTC was adopted after its release. In February 2026, U.S. EPA took final action to partially approve and partially disapprove the inclusion of CTC in the California SIP. This partial disapproval is applicable only to portions of the regulation that address vehicles registered out-of-state traveling in California. EPA's action does not impact CARB's ability to enforce and implement CTC for all applicable vehicles operating in California.

Although CARB disagrees with the legal basis for the partial disapproval, the enclosed CTC off-model adjustment factors only account for emissions reductions from the portion of the regulation approved into the SIP for in-state registered vehicle categories subject to CTC. The attached documents provide off-model adjustment factors that can be applied to the approved version of EMFAC (EMFAC2021 with the November 2025 adjustment factors) to reflect the benefits of CTC (*Attachment B* and *Appendix B*).

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<sup>1</sup> Per EPA's November 21, 2025, approval letter, found in the [EMFAC section](#) of EPA's Policy and Technical Guidance for State and Local Transportation Resources website.

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If you have any questions or need further information, please contact me by email at [Matthew.Lakin@arb.ca.gov](mailto:Matthew.Lakin@arb.ca.gov) or by phone at (916) 712-7965 or Sara Forestieri by email at [Sara.Forestieri@arb.ca.gov](mailto:Sara.Forestieri@arb.ca.gov) or by phone at (279) 842-9032.

Sincerely,

Matthew Lakin, Ph.D., Chief, Air Quality Planning and Science Division

Enclosures