

April 10, 2023

Elizabeth Adams
Director, Air and Radiation Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, California 94105
adams.elizabeth@epa.gov

Dear Ms. Adams,

On February 17, 2023, California Air Resources Board (CARB) staff provided to the U.S. Environmental Protection Agency (U.S. EPA) EMISSION FACTOR (EMFAC) off-model adjustment factors that account for the emission benefits of California's Heavy-Duty Vehicle Inspection and Maintenance Program (HD I/M or Program). CARB's Board approved HD I/M in December 2021, and the California Office of Administrative Law (OAL) approved the Program with an effective date of January 1, 2023. CARB submitted HD I/M to U.S. EPA for inclusion in the California State Implementation Plan (SIP) on December 14, 2022.

CARB and U.S. EPA staff discussed the February 17, 2023 request to approve off-model adjustment factors on March 20, 2023. As an outcome of this meeting, CARB is providing updated and interim off-model adjustment factors for Metropolitan Planning Organizations (MPOs) to use for regional conformity determinations. CARB plans to incorporate the full emission benefits of HD I/M, which are reflected in the off-model adjustment factors submitted to U.S. EPA on February 17, 2023, into the next release of EMFAC that is anticipated by 2025. However, in the interest of making the interim adjustment factors available to MPOs for use in transportation conformity as soon as possible, CARB staff reduced the magnitude of the emission benefits of HD I/M by 50 percent. CARB requests that the attached interim transportation conformity off-model adjustment factors remain applicable until the first California nonattainment area 70 parts per billion 8-hour ozone attainment demonstration and/or reasonable further progress demonstration and associated motor vehicle emissions budgets are approved. Interim transportation conformity off-model adjustment factors for EMFAC2017 and EMFAC2021 are enclosed in this letter.

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,



Michael Benjamin, D. Env, Division Chief, Air Quality Planning and Science Division

Enclosures

cc: (with attachment)

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David Quiros, Chief, Mobile Source Analysis Branch
David.Quiros@arb.ca.gov