

## Attachment D-1

Descriptions of the proposed changes to the test procedures and the reasons for making them.

This discussion does not address non-substantive modifications to correct typographical or grammatical errors, changes in numbering or formatting, addition of or edits to internal regulatory cross-references, or similar revisions that improve clarity.

### **Proposed Modifications to the “California 2015 and Subsequent Model Criteria Pollutant Exhaust Emission Standards and Test Procedures and 2017 and Subsequent Model Greenhouse Gas Exhaust Emission Standards and Test Procedures for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles”**

#### 1. Cross References in Note and E.1.1.2.1.4.2

There are two occurrences where subsections of title 13, California Code of Regulations (CCR), section 1961.4 are referenced in these test procedures. Since section 1961.4 has been restructured, as discussed elsewhere in this Notice (see, e.g., Attachment B-1), it is necessary to modify these test procedures to correctly identify the intended referenced subsections. The first occurrence where the reference is being corrected is for the second document listed under the “Note” near the beginning of the document that shows other documents to be used in conjunction with this document. The reference is being changed from “section 1961.4(f)” to “section 1961.4(c).” The second occurrence where the reference is being corrected is in section E.1.1.2.1.4.2 of these test procedures. The reference to “section 1961.4 subsection (c)(2)(A)” is being changed to “section 1961.4 subsection (d)(2)(A)2.a.”

#### 2. Subsection E.1.1.2.1.4.2

This subsection establishes an alternative phase-in schedule for the 1 milligram per mile (mg/mi) particulate matter (PM) standard for passenger cars, light-duty trucks, and medium-duty passenger vehicles. This alternative phase-in schedule primarily applies for model years 2025 through 2028. However, under the current regulations, a manufacturer may include vehicles that are certified to the 1 mg/mi PM standard prior to model year 2025 as part of its alternative phase-in.

One of the proposed changes for the 45-day notice would have prohibited manufacturers from including vehicles that certify to the 1 mg/mi PM standard prior to model year 2024 in the alternative phase-in. Staff is proposing as part of the 15-day changes to remove that restriction. This change is necessary because some manufacturers have already begun certifying 2023 model year vehicles and have included 2023 model year vehicles as part of their alternative phase-in plan. The proposed modification are necessary to avoid inadvertently disadvantaging these manufacturers and to promote compliance with the requirements to reduce emissions.