



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

October 21, 2013

Mr. Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Mr. Corey:

Thank you for the opportunity to comment on California's proposed regulation, "*State Implementation Plan Credit from Mobile Agricultural Equipment*," which is scheduled for public hearing by the California Air Resources Board (CARB) on October 24, 2013, and for codification in Title 13 of the California Code of Regulations as Article 4.1, Section 2428.

EPA supports the State's effort to create a mechanism pursuant to the Clean Air Act to quantify, for state implementation plan (SIP) credit, emissions reductions achieved through voluntary incentive programs that accelerate the purchase of new, cleaner farm equipment meeting EPA emission standards. Toward that end, we have worked with CARB, the San Joaquin Valley Air Pollution Control District (SJVAPCD), and the USDA Natural Resources Conservation Service over the last year on SJVAPCD Rule 9610, to ensure that emission reductions from incentive programs implemented in the San Joaquin Valley are quantifiable, surplus, permanent and enforceable consistent with Clean Air Act requirements.

We welcome the opportunity to work with CARB on additional state programs that support these efforts. As a preliminary matter, however, it is not clear to us how CARB's proposed regulation would address the requirements of the Clean Air Act, what role it would play in a SIP, and how it would "complement" SJVAPCD Rule 9610 consistent with its stated purpose. We look forward to working with CARB to develop a mechanism for quantifying emission reductions from incentive programs that both complements Rule 9610 and satisfies the requirements of the Clean Air Act, including EPA's SIP completeness criteria in 40 CFR part 51, appendix V.

Please feel free to contact Andy Steckel (415-947-4115) to discuss these issues further.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Jordan".

Deborah Jordan
Director, Air Division