

February 23, 2016

Mr. Allen Garneau  
U.S Coast Guard Headquarters, Stop 7418  
2703 Martin Luther King Jr. Avenue  
Washington, D.C. 20593-7418  
Via email: allen.m.garneau@uscg.mil

**RE: Ambassador Bridge Enhancement Project (ABEP), Public Notice 09-01-16**

Dear Mr. Garneau,

The Ambassador Bridge Company's ABEP proposal is flawed, incomplete, and does not comply with all the federal requirements. In addition, some of the issues stated in the U.S. Coast Guard (USCG) Abeyance letter dated June 15, 2009 were not addressed by the Detroit International Bridge Company (DIBC).<sup>1</sup>The City of Detroit had no legal authority to transfer land ownership of Riverside Park, therefore the requirements of 33 CFR 115.05 were not met. Another critical issue is that National Environmental Policy Act (NEPA) process is flawed in this application since the ABEP is segmented to avoid full elevation to an Environmental Impact Statement (EIS). The following lists, in detail, the facts that should result in denial of the ABEP and require an EIS *if* ownership requirement is met.

**Land swap was illegal, violates trust fund restrictions – 33 CFR 115.05 requirement not met**

It is irresponsible for the USCG to move forward in assuming that the Bridge Company owns all the land necessary for the ABEP, especially when there is no legal document providing DIBC ownership of Riverside Park. According to 33 CFR 115.05 states "*Especial care will be taken that Federal approval is not granted when there is doubt of the right of the builder to construct and utilize the bridge.*"

The USCG's own Letter of Abeyance admits to the restrictions on the use of Riverside Park for an international crossing. It is also critical that the USCG acknowledge the legal process required and restrictions on the land triggered by grants from the National Park Service Land Water Conservation Fund (LWCF) and the Michigan National Resources

<sup>1</sup> USCG Letter of Abeyance, June 15, 2009 <http://tollroadsnews.com/sites/default/files/USCG-AmbBr.pdf>

Trust Fund (MNRTF). See attached letters from the State of Michigan and the U.S. Federal Government acknowledging that the so called "land swap" is not likely to be realized. No amount of political connections or press conferences can change the law. I urge that the USCG suspend the application due to the Bridge Company's failure to meet the requirements of 33 CFR 115.05.

**Segmentation, Procedural Shortfalls amount to failure to meet NEPA requirements**

There is strong indication that ABEP is segmented and creates uncertainty over final impact on National Environmental Policy Act (NEPA) therefore USCG must not approve until fully addressed. Moreover, the information provided in the ABEP regarding air quality uses outdated data and a modeling process that falls short of what is required by the Environmental Protection Agency (EPA). The Clean Air Act (ACA) requires the EPA to update its mobile source emission models. The EPA did update their mobile source modeling to MOVES2010a in August 2010<sup>2</sup>. Outdated MOBILE6.2 modeling software was used instead of MOVES2010a in the ABEP application, thereby creating uncertainty of the impact of NEPA.

Secondly, the procedural shortfalls in the ABEP are serious and prevents the public the right to full protections under the law. According to Lobbying Reports filed April 17, 2009 (see attachment A & B), DIBC has been lobbying the federal government to close down Fort Street near their plaza. They are clearly segmenting the project intentionally. They are intending to expand their plaza and have excluded it from their ABEP application, avoiding the proper legal process, including an elevated EIS to be conducted. The USCG is fully aware that DIBC had attempted to segment the project with the Gateway Project which resulted in a design that did NOT include the elevated ramp along Fort Street. It is critical that USCG ensure that DIBC is not attempting to avoid following federal laws again.

Statements by DIBC have indicated that they have no intention of closing down the current bridge. The company's statement that they would use the current bridge for "overflow" creates uncertainty as to whether or not it would be closed. What does overflow mean? Since the Ambassador Bridge is privately owned, how would this be enforced? The most current proof that DIBC is using the word "overflow" rather than closed is from February 14, 2014 where it was stated, "Moroun has said the original span would be used only for overflow border traffic during major events."<sup>3</sup> Even in previous community meetings, DIBC officials refrain from using the word replacement bridge and began using the words "second span" and "twinning" which is inconsistent with the ABEP.

<sup>2</sup> EPA Releases MOVES2010a Mobile Source Emissions Model Update  
<http://www3.epa.gov/otaq/models/moves/MOVES2010a/420f10050.pdf>

<sup>3</sup> <http://www.crainsdetroit.com/article/20140214/NEWS/140219921/canadian-government-2nd-moroun-bridge-wont-harm-environment>

### ABEP must be elevated to an EIS

In addition to the fact that segmentation is present and the incorrect modeling process was used in this ABEP, the USCG's Letter of Abeyance sent in June 2009 correctly expressed the concerns by the U.S. Environmental Protection Agency (EPA):

*"Of note, the U.S. EPA advised the Coast Guard that it had significant concerns regarding the cumulative effects of air quality from the ABEP and ABGP; EPA specifically noted differences between the ABGP environmental documentation, how the ABGP is operating while under construction, and how it might ultimately operate when completed. The City of Windsor also documented multiple concerns, most notably concerning air quality."*<sup>4</sup>

Although the EPA's recent letter regarding the project is inconsistent with the concerns expressed in their letter dated April 29, 2009, it is clear that the concerns regarding cumulative effects remains and a number of uncertainty due to the incorrect modeling process and old data being used.<sup>5</sup>

In the EPA's own letter, it stated that they were concerned that the ABEP would exceed beyond the 6 lanes. "However, we continue to have concerns about the cumulative effects on air quality."<sup>6</sup> They go on to recommend that "a hot spot analysis that models the whole Ambassador Bridge/plaza system in order to evaluate cumulative effects of the Gateway and ABEP projects, including the vehicle travel links between the exit of the U.S. – bound truck plaza and the freeway system." Has this been completed? If so, was it with the incorrect modeling procedure required by the EPA?

Further, this is an international crossing that has long term impacts on the air quality of the host community which already endures one of the worst air quality in Michigan. This project will operate for 100 years or more and its impact on our health and environment is dangerous if not mitigated properly. A project of this scope and magnitude deserves the scrutiny of an EIS.

It is critical that USCG also recognizes the fact that the area for the project is out of compliance with the Clean Air Act for sulfur dioxide. The zip code where the Ambassador Bridge is located, has one of the highest rates of persistent asthma for children covered by Medicaid.<sup>7</sup> Emissions from mobile sources, especially truck diesel exhaust, contribute to the amount of particulate matter in the air.<sup>8</sup> The stretch of bridge between Detroit and Windsor, Ontario is the busiest international crossing for

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<sup>4</sup> USCG Letter of Abeyance, June 15, 2009 <http://tollroadsnews.com/sites/default/files/USCG-AmbBr.pdf>

<sup>5</sup> See April 29, 2009 EPA letter by Alan Walts attached to the Letter of Abeyance, <http://tollroadsnews.com/sites/default/files/USCG-AmbBr.pdf>

<sup>6</sup> See above

<sup>7</sup> Wasilevich EA, Lyon-Callo S, Rafferty A, Dombkowski K. "Detroit – The Epicenter of Asthma Burden." *Epidemiology of Asthma in Michigan*. Bureau of Epidemiology, MI Department of Community Health, 2008.

<sup>8</sup> Agency for Toxic Substances and Disease Registry. *Your Child's Environmental Health: How the Body Works: Differences Between Adults and Children*. [https://michigan.gov/documents/ATSDRChildrens\\_Health\\_handouts\\_FS\\_15597\\_7.pdf](https://michigan.gov/documents/ATSDRChildrens_Health_handouts_FS_15597_7.pdf)

commercial vehicles with nearly 13,000 trucks every day.<sup>9</sup> An increasingly large body of evidence indicates that traffic-related exposures and residential proximity to vehicular traffic<sup>10</sup> are associated with increased respiratory conditions and symptoms in children, including asthma<sup>11</sup> wheezing, recurrent respiratory illnesses<sup>12</sup>, and hospital admissions for asthma.<sup>13</sup> An international crossing in a neighborhood with already high rates of asthma should motivate the USCG to do its due diligence with this application.

**ABEP is not complete, denial is needed**

I am urging that the USCG to deny the Ambassador Bridge Enhancement Project (Public Notice 09-01-16) application. The USCG has a duty to ensure that the application is complete with all the necessary information needed to make the proper decision. The DIBC's past actions must be weighed with consideration of this application. This is a company that claimed they owned all the property for a new bridge the last time they applied, they started building their new bridge without proper approval, they gutted a state interchange project and their owner had to go to jail before Gateway had to be completed by the State of Michigan. They have proven over and over again that they like to take short cuts and seek only to benefit their profit margins. USCG must make sure that no company tries to avoid the law.

DIBC does not own all the property necessary for their new bridge as required by federal law.

I urge USCG to do its due diligence and protect the public by denying the ABEP.

Sincerely,



Rashida Tlaib

Sugar Law Center for Economic & Social Services

Resident of southwest Detroit

<sup>9</sup> Southeast Michigan Council of Governments, SEMCOG Information, The Ambassador Bridge, [www.semcoq.org/WorkArea/downloadasset.aspx?id=5369](http://www.semcoq.org/WorkArea/downloadasset.aspx?id=5369)

<sup>10</sup> Clear Air Task Force. 2007. "No escape from diesel exhaust: how to reduce commuter exposure." [http://www.catf.us/resources/publications/files/No\\_Escape\\_from\\_Diesel\\_Exhaust.pdf](http://www.catf.us/resources/publications/files/No_Escape_from_Diesel_Exhaust.pdf)

<sup>11</sup> <http://www3.epa.gov/region1/eco/airtox/diesel.html>

<sup>12</sup> Clear Air Task Force. 2007. "No escape from diesel exhaust: how to reduce commuter exposure." [http://www.catf.us/resources/publications/files/No\\_Escape\\_from\\_Diesel\\_Exhaust.pdf](http://www.catf.us/resources/publications/files/No_Escape_from_Diesel_Exhaust.pdf)

<sup>13</sup> EPA (Environmental Protection Agency). 2014. Integrated science assessment for particulate matter, health criteria, final report. <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=216546#Download>

Clerk of the House of Representatives Legislative Resource Center B-106 Cannon Building Washington, DC 20515 <a href="http://lobbyingdisclosure.house.gov">http://lobbyingdisclosure.house.gov</a>	Secretary of the Senate Office of Public Records 232 Hart Building Washington, DC 20510 <a href="http://www.senate.gov/lobby">http://www.senate.gov/lobby</a>
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# LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant Name <input checked="" type="checkbox"/> Organization/Lobbying Firm <input type="checkbox"/> Self Employed Individual <u>JB Advocacy, LLC</u>			
2. Address Address1 <u>Jon</u> Address2 <u>Suite 500, West</u> City <u>Washington</u> State <u>DC</u> Zip Code <u>20005</u> Country <u>USA</u>			
3. Principal place of business (if different than line 2) City _____ State _____ Zip Code _____ Country _____			
4a. Contact Name <u>Mr. Jon Boisclair</u>	b. Telephone Number <u>2023934841</u>	c. E-mail <u>brenda@advocacy.com</u>	5. Senate ID# <u>294110-48</u>
7. Client Name <input type="checkbox"/> Self <input type="checkbox"/> Check if client is a state or local government or instrumentality <u>The Advocacy Group</u>			6. House ID# <u>374110002</u>

**TYPE OF REPORT** 8. Year 2009 Q1 (1/1 - 3/31)  Q2 (4/1 - 6/30)  Q3 (7/1 - 9/30)  Q4 (10/1 - 12/31)

9. Check if this filing amends a previously filed version of this report   
 10. Check if this is a Termination Report  Termination Date \_\_\_\_\_ 11. No Lobbying Issue Activity

INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13	
<p><b>12. Lobbying</b></p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$5,000 <input type="checkbox"/></p> <p>\$5,000 or more <input checked="" type="checkbox"/> \$ <u>20,000.00</u></p> <p>Provide a good faith estimate, rounded to the nearest \$10,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p><b>13. Organizations</b></p> <p>EXPENSE relating to lobbying activities for this reporting period were:</p> <p>Less than \$5,000 <input checked="" type="checkbox"/></p> <p>\$5,000 or more <input type="checkbox"/> \$ _____</p> <p><b>14. REPORTING</b> Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>

Signature Digitally Signed By: Jon Boisclair, Partner Date 4/17/2009

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code TRA

16. Specific lobbying issues

Working on language to direct Department of Transportation to help facilitate approval of permits, lease arrangements, and highway connection to second span of the Ambassador Bridge in Detroit, Michigan; FY 2010 Transportation, HUD appropriations for 1) rail access project at Port of Detroit; 2) reconstruction of Clark Street between Fort Street and Port of Detroit; and 3) for design work related to relocation of Fort Street near the Ambassador Bridge, to enhance Riverfront Conservancy activities; and Language to preclude further funding for a Detroit River International Crossing Study project.

17. House(s) of Congress and Federal agencies  Check if None

House of Representatives, Senate, Transportation, Dept of (DOT)

18. Name of each individual who acted as a lobbyist in this issue area

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Jon	Boisclair			<input type="checkbox"/>
Robert	Mills		Former Professional Staff Mbr. Senate Appropriatio	<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above  Check if None

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code ECN

16. Specific lobbying issues

Proposing language in Commerce, Justice, Science appropriations bill to urge EDA funding for infrastructure components of Detroit Riverfront Conservancy project.

17. House(s) of Congress and Federal agencies  Check if None

House of Representatives, Senate

18. Name of each individual who acted as a lobbyist in this issue area

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Jon	Boisclair			<input type="checkbox"/>
Robert	Mills		Former Professional Staff Mbr. Senate Appropriatio	<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above  Check if None

**Information Update Page - Complete ONLY where registration information has changed.**

20. Client new address

Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_ Country \_\_\_\_\_

21. Client new principal place of business (if different than line 20)

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_ Country \_\_\_\_\_

22. New General description of client's business or activities

\_\_\_\_\_

**LOBBYIST UPDATE**

23. Name of each previously reported individual who is no longer expected to act as a lobbyist for the client

First Name	Last Name	Suffix	First Name	Last Name	Suffix
<b>1</b>	_____	_____	<b>3</b>	_____	_____
<b>2</b>	_____	_____	<b>4</b>	_____	_____

**ISSUE UPDATE**

24. General lobbying issue that no longer pertains

### AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Internet Address:

Name	Address				Principal Place of Business (city and state or country)	
	Street Address	City	State/Province	Zip	Country	
						City State Country

26. Name of each previously reported organization that is no longer affiliated with the registrant or client

1	2	3
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### FOREIGN ENTITIES

27. Add the following foreign entities:

Name	Address			Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client
	Street Address	City	State/Province			
				City State Country		%

28. Name of each previously reported foreign entity that no longer owns, or controls, or is affiliated with the registrant, client or affiliated organization

1	3	5
2	4	6

Clerk of the House of Representatives  
Legislative Resource Center  
B-106 Cannon Building  
Washington, DC 20515  
<http://lobbyingdisclosure.house.gov>

Secretary of the Senate  
Office of Public Records  
232 Hart Building  
Washington, DC 20510  
<http://www.senate.gov/lobby>

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The Advocacy Group	
<b>2. Address</b>	
Address1 1333 H. Street, NW	Address2 Suite 500, West
City Washington	State DC Zip Code 20005 Country USA
<b>3. Principal place of business (if different than line 2)</b>	
City	State Zip Code Country
<b>4a. Contact Name</b>	<b>b. Telephone Number</b>
Mr. George A. Ramonas	2023934841
	<b>c. E-mail</b>
	brenda@advocacy.com
	<b>5. Senate ID#</b>
	261-443
<b>7. Client Name</b>	<input type="checkbox"/> Self <input type="checkbox"/> Check if client is a state or local government or instrumentality
Detroit International Bridge Company	
	<b>6. House ID#</b>
	300180040

**TYPE OF REPORT** 8. Year 2009 Q1 (1/1 - 3/31)  Q2 (4/1 - 6/30)  Q3 (7/1 - 9/30)  Q4 (10/1 - 12/31)

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Signature Digitally Signed By: Robert E. Mills, Partner

Date 4/17/2009

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17. House(s) of Congress and Federal agencies  Check if None

House of Representatives, Senate, Transportation, Dept of (DOT)

18. Name of each individual who acted as a lobbyist in this issue area

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Robert	Mills		Former Professional Staff Mbr. Senate Appropriatio	<input type="checkbox"/>
Jon	Boisclair			<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above  Check if None

## EPA Releases MOVES2010a Mobile Source Emissions Model Update: Questions and Answers

### What is MOVES2010a?

MOVES2010a, released in August 2010, is a minor update to MOVES2010. MOVES2010, released in December 2009, is EPA's state-of-the-art tool for estimating emissions from highway vehicles. The model is based on analysis of millions of emission test results and considerable advances in the Agency's understanding of vehicle emissions. As EPA has stated in the past, the advanced software used for MOVES allows EPA to easily incorporate new information. EPA is now releasing MOVES2010a to allow MOVES users to easily account for emissions under new car and light truck energy and greenhouse gas standards and to benefit from several improvements to MOVES general performance.

### What has changed from MOVES2010 to MOVES2010a?

MOVES2010a incorporates new car and light truck greenhouse gas emissions standards affecting model years 2012-and-later (published May 7, 2010<sup>1</sup>) and updates effects of corporate average fuel economy standards affecting model years 2008-2011.<sup>2</sup> MOVES2010a includes reductions in greenhouse gases associated with those standards in future calendar years, and small reductions in refueling and sulfur-related emissions associated with the reductions in vehicle fuel consumption.

MOVES2010a also includes a number of other improvements. These are listed in Appendix A. The net impact of these changes on criteria pollutant emissions is small, with decreases of one percent or less in NO<sub>x</sub>, PM<sub>2.5</sub>, and CO emissions for regional inventory runs using example local inputs. Compared to MOVES2010, most regional inventory runs should see an increase in methane emissions and a small decrease (less than five percent using example local inputs) in the associated Volatile Organic Compound (VOC) and air toxics emissions. However, comparisons for runs that focus on a particular project or sourcetype may vary.

<sup>1</sup> [www.regulations.gov/search/Regs/home.html#documentDetail?R=0900006480ae8a38](http://www.regulations.gov/search/Regs/home.html#documentDetail?R=0900006480ae8a38)

<sup>2</sup> [www.regulations.gov/search/Regs/home.html#documentDetail?R=09000064802cefed](http://www.regulations.gov/search/Regs/home.html#documentDetail?R=09000064802cefed) and [www.regulations.gov/search/Regs/home.html#documentDetail?R=09000064809375ea](http://www.regulations.gov/search/Regs/home.html#documentDetail?R=09000064809375ea)

**When should MOVES2010a be used for state implementation plans and transportation conformity analyses?**

Because the impact of the changes in MOVES2010 on criteria pollutant emissions are small, we are not considering MOVES2010a a new emissions model for state implementation plan (SIP) and transportation conformity purposes under 40 CFR 93.111, and there will be no new grace period for regional conformity analyses using MOVES2010a. The MOVES2010 grace period for regional conformity analyses will apply to the use of MOVES2010a as well. It is important to note that EPA has not yet approved any version of MOVES for use in project-level conformity analyses, and will do so in the future when applicable conformity guidance is completed.

All states other than California should use MOVES2010a for future SIPs in order to take full advantage of the improvements incorporated in this version. However, state and local agencies that have already completed significant work on a SIP with MOVES2010 can continue to use it. To determine when to use MOVES2010a in transportation conformity determinations, refer to the March 2, 2010 Federal Register notice which announced the grace period for MOVES2010 (75 FR 9411) and the EPA's policy guidance on the use of MOVES2010 for SIP development and transportation conformity ([www.epa.gov/otaq/models/moves/420b09046.pdf](http://www.epa.gov/otaq/models/moves/420b09046.pdf)). EPA's existing guidance on the use of MOVES2010 for SIPs and conformity applies to MOVES2010a as well. We will work with state and local agencies to resolve any questions that come up regarding differences in MOVES2010 and MOVES2010a.

**What needs to be done to switch from using MOVES2010 to MOVES2010a?**

Instructions for downloading and installing MOVES2010a are available on the MOVES web page [www.epa.gov/otaq/models/moves/](http://www.epa.gov/otaq/models/moves/). Users will find that runspecs and input databases developed with MOVES2010 may need modification to be able to run with MOVES2010a. Users should regenerate fuelFormulation input files and Alternate Vehicle Fuels & Technologies (AVFT) strategy files. Output databases will need to be recreated with a new name since several new tables have been added. Users should always specify what version of MOVES was used to create emissions results.

**What other resources are available that apply to MOVES2010a?**

The latest version of EPA's existing Technical Guidance for MOVES2010 (available at [www.epa.gov/otaq/models/moves/420b10023.pdf](http://www.epa.gov/otaq/models/moves/420b10023.pdf)) also applies to MOVES2010a. The MOVES2010 User Guide has been updated to reflect changes in MOVES2010a. The document "EPA Releases MOVES2010 Mobile Source Emissions Model: Questions and Answers" (available at: [www.epa.gov/otaq/models/moves/420f09073.pdf](http://www.epa.gov/otaq/models/moves/420f09073.pdf)) contains general information about the release of MOVES2010 that also applies to MOVES2010a.

If you have technical questions about MOVES2010a, please contact the MOVES team at [mobile@epa.gov](mailto:mobile@epa.gov). If you have SIP or conformity policy questions, please contact Rudy Kapichak ([kapichak.rudolph@epa.gov](mailto:kapichak.rudolph@epa.gov)) or Meg Patulski ([patulski.meg@epa.gov](mailto:patulski.meg@epa.gov)).