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Attorneys for Respondent
LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY

BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
[Facility ID No. 43758],

Respondent.

CASE NO. 5874-2

DECLARATION OF ALAN TANG

Date: **February 24, 2026**
Time: 9:00 a.m.
Place: Hearing Board
South Coast AQMD
21865 Copley Drive
Diamond Bar, CA 91765

I, Alan Tang, declare as follows:

1. I am the Senior Director, Non-Revenue Fleet Maintenance for the Los Angeles County Metropolitan Transportation Authority (“LA Metro”). I provide oversight, direction, and support of the overall maintenance activities of all operating divisions, Central Maintenance Facility, and Non-Revenue Department to ensure all aspects of the operation are performing at or above planned goals and objectives. My duties include projecting future requirements

- 1 for non-revenue vehicle replacements.
- 2 2. If called as a witness, I am competent to testify as to the matters set forth in this Declaration
3 based upon my own personal knowledge, information and belief. I make this Declaration to
4 inform the Hearing Board of the South Coast Air Quality Management District of efforts
5 undertaken by LA Metro to comply with the Board's Order for Abatement in this case and
6 to support the proposed Modified Stipulated Order.
- 7 3. In compliance with the vehicle replacement schedule attached to the most recent Modified
8 Order for Abatement, LA Metro made good faith efforts to procure a suitable EV Hi-Rail
9 vehicle to replace the vehicle in category 3 (EV pilot replacement). Unfortunately, due to the
10 narrow rail curvature on LA Metro rail tracks, EV vehicles on the open market do not meet
11 LA Metro's specifications. So, LA Metro collaborated with RWC Group, a local vendor, to
12 develop the Hi-Rail EV pilot vehicle specifications. On July 2, 2024, LA Metro and RWC
13 Group completed the development of the vehicle specifications that would work on LA
14 Metro's rail curvature. The development of these specifications cleared the path for LA
15 Metro to solicit bids for the EV pilot vehicle in the 4th quarter of FY24. Unfortunately, LA
16 Metro did not receive any proposals or bids in response to this solicitation.
- 17 4. LA Metro issued a Request for Industry Review in the first quarter of FY2026 to: (a)
18 engage with electric vehicle manufacturers and industry vendors; (b) identify an electric
19 high-rail vehicle that vendors can provide and which meets LA Metro's operational and
20 regulatory requirements. Metro will now pursue a sole source procurement in the third
21 quarter of FY2026 to facilitate direct negotiation and collaboration with the potential vendor,
22 RWC Group, as this approach is deemed the most effective for acquiring the High-Rail EV
23 Pilot vehicle. Due to the lack of viable bids, the anticipated delivery date for the subject
24 vehicle will be delayed beyond the original planned fourth quarter of FY2026. LA Metro is
25 actively exploring alternative procurement methods to mitigate delays and advance the pilot
26 project. LA Metro Vehicle Code 14-0038 will be replaced as part of the Electric High-Rail
27 Truck Pilot project.
- 28 5. Following the successful procurement, deployment and performance of the EV pilot vehicle,

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own personal knowledge except as to matters stated to be true on information and belief and as to such matters I am informed and believe that they are true and correct.

Executed this 18th day of February, 2026 at Los Angeles, California.


ALAN TANG