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10 LOS ANGELES COUNTY METROPOLITAN
11 TRANSPORTATION AUTHORITY
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BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

13 **In the Matter of**

14 SOUTH COAST AIR QUALITY
15 MANAGEMENT DISTRICT,

16 Petitioner,

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

20 Respondent.

CASE NO. 5874-2

DECLARATION OF ALAN TANG

Date: July 28, 2026
Time: 9:00 a.m.
Place: Hearing Board
South Coast AQMD
21865 Copley Drive
Diamond Bar, CA 91765

23 I, Alan Tang, declared as follows:

- 24 1. I am the Senior Director, Non-Revenue Fleet Maintenance for the Los Angeles County
25 Metropolitan Transportation Authority ("LA Metro"). I provide oversight, direction, and
26 support of the overall maintenance activities of all operating divisions, Central Maintenance
27 Facility, and Non-Revenue Department to ensure all aspects of the operation are performing
28 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). Since the issuance of
10 the Modified Stipulated Order, LA Metro has taken additional steps to procure an Electric
11 Hi-Rail Truck Pilot. RWC was officially awarded the contract to manufacture the Electric
12 Hi-Rail Truck during Q4 of FY2026. RWC estimates the truck manufacturing and
13 assembly will be completed in 11 to 12 months, placing the estimated completion window
14 in Q1 or Q2 of FY2028. Following the successful procurement, deployment and
15 performance of the EV pilot vehicle, Metro will then undertake the procurement of Hi-Rail
16 trucks (LA Metro Vehicle Codes 14-0034, 14-0035, and 14-0036) from RWC. The
17 acquisition of these vehicles was always intended to follow the success of the EV pilot
18 vehicle.

19 4. With regard to the replacement of four High-Rail Bucket Trucks (category 2 vehicles)
20 following LA Metro's bid for vehicles 14-0032, 14-0033, 21-1115, and 21-1116, the
21 selected vendor originally notified LA Metro that delivery was scheduled for Q4 of FY
22 2026. However, recently the vendor notified LA Metro of a delay in the delivery of these
23 trucks due to an error in the chassis order. The vehicles are required to meet specific tunnel
24 clearance requirements. LA Metro anticipates the new, compliant vehicles will be
25 delivered no later than Q2 of FY of 2027.

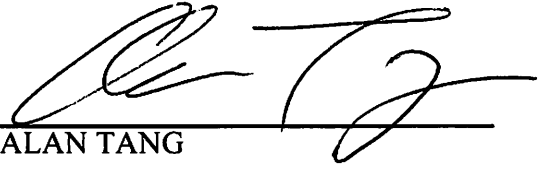
26 5. During Q4 of FY2026, LA Metro began removing highly sensitive computers, software
27 applications, and specialized onboard equipment from the Mobile Communications &
28 Command Vehicle (category 1) in anticipation of its removal from LA Metro's fleet. The

1 disposal of the vehicle (Vehicle Code 40-0001) is expected to be completed during Q2 of
2 FY2027.

- 3 6. The Invitation for Bid to procure two Aerial Trucks (category 2) to replace Vehicle Codes
4 14-0048 and 14-0049 will close by Q2 of FY2027. The anticipated replacement of these
5 vehicles will likely be delayed beyond the original schedule to Q2 of FY2028.
- 6 7. All other vehicles identified for replacement in the Modified Order for Abatement have
7 already been or will be removed from service and replaced in compliance with the terms of
8 the Modified Order.

9 I declare under penalty of perjury under the laws of the State of California that the foregoing
10 is true and correct of my own personal knowledge except as to matters stated to be true on
11 information and belief as to such matters I am informed and believe that they are true and correct.
12

13 Executed this 22nd day of July 2026 at Los Angeles, California.

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ALAN TANG