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LOS ANGELES REGIONAL  
6 INTEROPERABLE  
COMMUNICATIONS SYSTEM  
7 AUTHORITY

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10  
11 **BEFORE THE HEARING BOARD OF THE**  
12 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**  
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14 In the Matter of  
15 THE LOS ANGELES REGIONAL  
INTEROPERABLE  
16 COMMUNICATIONS SYSTEM  
AUTHORITY

17                   Petitioner, and,  
18 SOUTH COAST AIR QUALITY  
19 MANAGEMENT DISTRICT,

20                   Respondent.  
21

CASE NO. 6234-5  
FACILITY ID No.: 193436

DECLARATION OF TED PAO IN  
SUPPORT OF THE LOS ANGELES  
REGIONAL INTEROPERABLE  
COMMUNICATIONS SYSTEM  
AUTHORITY'S APPLICATION FOR  
REGULAR VARIANCE AND WAIVER OF  
FEES

Date: April 23, 2025  
Time: 9:30 AM  
Place: 21865 Copley Drive  
Diamond Bar, CA 91765

1 I, TED PAO, declare as follows:

2 1. I am employed by the County of Los Angeles, Sheriff's Department, and am on  
3 loan to the Los Angeles Regional Interoperable Communications Systems (LA-RICS) Joint Power  
4 Authority (LA-RICS Authority) as the Technical Lead. For the last 17 years, I have been  
5 responsible for managing technical matters relating to the LA-RICS' Land Mobile Radio (LMR)  
6 System project. Unless otherwise indicated, the following facts are true of my own personal  
7 knowledge and if called upon to testify, I could and would testify competently thereto.

8 2. The LA-RICS Authority is a Joint Powers Authority that is chartered to build and  
9 operate the critical communications radio network, the LA-RICS' LMR System, which provides  
10 wireless communication services for Public Safety emergency personnel throughout LA County  
11 and interoperates with local, State and Federal agencies.

12 3. The LMR System is a radio network dedicated entirely to first responders, such as  
13 law enforcement, fire, and Emergency Management Services (EMS) personnel. The LMR System  
14 creates a unified regional network of radio sites to provide communication services to first  
15 responders. The network eliminates barriers that normally impede multi-jurisdictional responses  
16 and allows police, firefighters and paramedics to communicate directly with other users outside of  
17 their particular agency to streamline the response. Federal, State, and local agencies use the  
18 network. The LMR System network was federally funded to include public-safety-grade  
19 standards, with one specific attribute included that each site is backed-up by an emergency back-  
20 up generator that will automatically start if the generator believes commercial power is lost at a  
21 site.

22 4. The site at issue in this petition, LA-RICS Authority's LMR site in the Angeles  
23 National Forest at APN 8675 016-307, Claremont, CA 91711 (known as "East Sunset Ridge" or  
24 "ESR"), Facility ID No. 193436, is one such site where an emergency back-up generator is used to  
25 ensure the site has power in the event commercial power is lost. This emergency back-up  
26 generator is an Internal Combustion Engine, Cummins Model No. QSB5-G6, Diesel-Fueled, 4-  
27 Cylinders, Turbocharged and Aftercooled, rated at 208 BHP, Driving an Emergency Electrical  
28 Generator (also referred to as, "ICE" or "emergency back-up generator"). This emergency back-up

1 generator is covered by Permit to Operate No. G63683. The LMR site is located in a mountainous  
2 area that is not easily accessible and provides critical public safety coverage from the east San  
3 Gabriel and Pomona Valley areas, over the Angeles Forest (in particular Mt. Baldy), and all the  
4 way east to San Bernardino and southeast to Riverside. Those areas are prone to wildfires during  
5 the wildfire season, and dangerous mudslides during extreme wet weather conditions.

6 5. Unfortunately, ESR sustained on January 7, 2025 a Southern California Edison  
7 (SCE) Public Safety Power Shutoff (PSPS) with an accompanying Southcoast AQMD Executive  
8 Order 25-01. This PSPS lasted for 68 hours. Southcoast AQMD Executive Order 25-01 excluded  
9 20.41 hours from these 68 hours. The PSPS occurred at the same time that the Governor of  
10 California declared a State of Emergency on January 7, 2025 related to the extreme wind and fire  
11 events: [https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE\\_Palisades-Fire\\_1-7-](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf)  
12 [25\\_Formatted.pdf](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf).

13 6. Thereafter, a second significant SCE outage occurred on February 5, 2025, due to  
14 damage to an underground power vault in a remote location which SCE has not been able to fix  
15 yet due to access restrictions caused by damage to the above ground tower adjacent to the vault.  
16 This outage caused by SCE from February 5, 2025 has not yet been restored as of the date of this  
17 declaration.

18 7. As of February 13, 2025, total calendar year-to-date run time of the emergency  
19 generator at ESR was 177.25 hours excluding the runtime of 88.5 hours during the PSPS and  
20 during when Southcoast AQMD's Executive Order 25-01 suspending rules pertaining to 200-hour  
21 limit for the operation of emergency generators were in effect. This PSPS and the SCE  
22 unscheduled outage are beyond LA-RICS Authority's control. As of LA-RICS Authority's original  
23 filing on February 13, 2025, total year-to-date generator runtime as of that date inclusive of the run  
24 hours during Edison's PSPS event and SCAQMD Executive Order 25-01's effective period is  
25 265.75 hours. Of these hours, 1.25 hours are for generator testing and maintenance.

26 8. And due to SCE not being able to fix the second major outage that occurred on  
27 February 5, 2025, there still is no SCE power to ESR and the generator has been running this  
28

1 entire time. As of April 17, 2025, the total year to date generator runtime is now 1776 hours,  
2 inclusive of the generator runtime during PSPS and Southcoast AQMD's Executive Order 25-01.

3 9. As of April 17, 2025, the total year to-date runtime has exceeded the permitted  
4 annual operating limit of 200 hours. Further, monthly testing and maintenance of the generator for  
5 the remainder of 2025 is estimated to be around 1 hour per month. The generator's runtime has  
6 exceeded the limit stipulated in Permit to Operate Condition #4 due to SCE's current and  
7 continued planned maintenance outages and possible unforeseen, unplanned power outages  
8 between now and the end of the calendar year.

9 10. Due to the importance of the LMR System and ESR to the LMR System, it is  
10 imperative to public safety that the network stays online with power through the emergency back-  
11 up generator, even if there are SCE power outages so that our public safety entities will be able to  
12 maintain critical communications services. The LMR System was used extensively by first  
13 responders during the Palisades, Eaton and other recent wildfires. The LA-RICS Authority does  
14 not want to shut off the emergency back-up generator. Losing power for the ESR site would not  
15 only hurt coverage for the localized area but would hurt system performance and reliability for the  
16 rest of the county due to critical microwave links this site provides.

17 9. The LMR System radio network is required to stay "on air" 24/7 throughout the  
18 year to support radio communications for the LA region's first responders for law enforcement,  
19 fire service, and emergency medical services. When commercial utility power from SCE is lost,  
20 ESR's automatic transfer switch on the emergency back-up generator starts and activates the  
21 generator to allow for a continual supply of electricity to maintain network operations until  
22 commercial utility power can be restored. Unfortunately, because of the SCE Power Shutoff  
23 (PSPS) and the second major outage on February 5, 2025 which were beyond LA-RICS  
24 Authority's control that occurred in this year which accounted for the majority of generator run  
25 time to date, we are over our 200 hour limit a year.

26 10. In order to maintain compliance, we need a variance to exceed the 200-hour limit  
27 this year. We are unable to control SCE's outage frequency and when they do maintenance on their  
28

1 infrastructure. We can only monitor and request updates from SCE to confirm when power is  
2 restored.

3 11. If LA-RICS is unable to operate the emergency generator during current and future  
4 power outages for the year it would pose a major public safety risk. Emergency services rely on  
5 the LA-RICS LMR System network for wireless communication extending throughout the remote  
6 regions of Los Angeles County. Losing power for this site would not only hurt coverage for the  
7 localized area but would hurt system performance and reliability for the rest of Los Angeles  
8 County due to critical microwave links this site provides. If a variance is not granted, the LA-  
9 RICS Authority, being a mission-critical communications system which supports public safety  
10 communications for daily operation and emergency responses by the Los Angeles region's first  
11 responders for law enforcement, fire, and emergency medical services, would have to incur  
12 extensive fines and penalties.

13 12. The LA-RICS LMR System at the ESR site is critical infrastructure for public  
14 safety communications and emergency response, and the LA-RICS Authority cannot disable the  
15 power infrastructure at the site.

16 13. The emergency back-up generator at the site is programed and setup to immediately  
17 shut down upon restoration of commercial utility power using the automatic transfer switch  
18 (ATS). Outside of weekly startup testing, excess emissions will drop to zero upon restoration of  
19 utility power.

20 14. Given the public safety need of providing a back-up supply of power to the ESR  
21 site in the event of an outage so public safety operations are not impacted, the LA-RICS Authority  
22 is seeking the variance now because it has exceeded the maximum allowed runtime of 200 hours  
23 under Condition 4 of the Permit to Operate for the site ESR generator.

24 15. This regular variance request is in follow up to Case No. 6234-5, in which the  
25 Hearing Board granted the LA-RICS Authority an interim variance from the emergency back-up  
26 generator's emissions limitations on March 11, 2025, to allow 1.0 hours total of needed continued  
27 maintenance and testing of the emergency back-up generator until a regular variance could be  
28

1 obtained. The LA-RICS Authority is currently in compliance with those Interim Variance  
2 Conditions.

3 16. Without a regular variance, the LA-RICS Authority will continue to violate District  
4 rule 203(b), which requires compliance with conditions in the Permit to Operate No. G63683.  
5 Further, the LA-RICS Authority has violated Condition No. 4 of the Permit to Operate, which has  
6 a maximum allowed runtime of 200 hours per year.

7 17. The LA-RICS Authority is currently subject to the interim emergency variance  
8 conditions that were issued on March 11, 2025, which allows it to operate the ICE for 1.0 hours  
9 for maintenance and testing time. But, the LA-RICS Authority will continue to require time to  
10 maintain and test the ICE. Importantly, in case of an emergency, the LA-RICS Authority will need  
11 additional hours beyond those already used during the calendar year.

12 18. Finally, the estimated excess emissions for the generator, when in use during the  
13 variance period are as follows: 60.32 grams per hour (3.19 pounds/day) of carbon monoxide (CO),  
14 351.52 gr/hour (18.60 lb/day) of oxides of nitrogen (NOx), and 214.24 gr/hour (11.34 lb/day) of  
15 reactive hydrocarbons (RHC).

16 19. I am aware of the information contained in the Proposed Findings and Decision of  
17 the Hearing Board, and incorporate that information in this Declaration to the extent not already  
18 presented. Moreover, I believe that information in the Proposed Findings and Decision of the  
19 Hearing Board to be true and accurate, such that if called as a witness, I could and would testify  
20 competently thereto.

21 I declare under penalty of perjury under the laws of the State of California that the  
22 foregoing is true and correct, and that this declaration was executed on April 17<sup>th</sup>, 2025 in La  
23 Canada, California.

24  
25 BY: \_\_\_\_\_



26 TED PAO  
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