

1 DAWYN R. HARRISON, County Counsel
TRUC L. MOORE, Principal Deputy County Counsel
2 (SBN 227576) • *tlmoore@counsel.lacounty.gov*
648 Kenneth Hahn Hall of Administration
3 500 West Temple Street
Los Angeles, California 90012-2713
4 Telephone: (213) 972-5719 · Fax: (213) 617-7182

5 Attorneys for Petitioner
LOS ANGELES REGIONAL
6 INTEROPERABLE
COMMUNICATIONS SYSTEM
7 AUTHORITY

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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. 6234-6
FACILITY ID No.: 195568

DECLARATION OF NANCY YANG IN
SUPPORT OF THE LOS ANGELES
REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM
AUTHORITY'S APPLICATION FOR
INTERIM VARIANCE AND WAIVER OF
FEES

Date: May 27, 2025
Time: 9:30 AM
Place: 21865 Copley Drive
Diamond Bar, CA 91765

1 I, NANCY YANG, declare as follows:

2 1. I am employed by the County of Los Angeles, Internal Services Department, and
3 am on full-time loan to the Los Angeles Regional Interoperable Communications Systems (LA-
4 RICS) Joint Powers Authority (LA-RICS Authority) as a telecommunications system consulting
5 engineer. I have been in this position for the last 8 ½ years of the 12 years with the LA-RICS
6 Authority. I am familiar with and have reviewed the petition filed in support of Case No. 6234-6
7 and specifically with the equipment at issue in this petition, Internal Combustion (IC) Engine
8 Permit to Operate (P/O) No. G67048 located at 16482U Santa Clara Truck Trail, Santa Clarita,
9 CA 91321. Unless otherwise indicated, the following facts are true of my own personal
10 knowledge and if called upon to testify, I could and would testify competently thereto.

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

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

25 4. The site at issue in this petition, LA-RICS Authority's LMR site in the Angeles
26 National Forest at 16482U Santa Clara Truck Trail, Santa Clarita, CA 91321 (known as "Loop
27 Canyon" or "LPC"), Facility ID No. 195568, is one such site where an emergency back-up
28 generator is used to ensure the site has power in the event commercial power is lost. This

1 emergency back-up generator is an Internal Combustion Engine, Cummins Model No. QSB5-G13,
2 Diesel-Fueled, 4-Cylinders, Turbocharged and Aftercooled, rated at 173 BHP, Driving an
3 Emergency Electrical Generator (also referred to as, "ICE" or "emergency back-up generator").
4 This emergency back-up generator is covered by Permit to Operate No. G67048. The LMR site is
5 located in a mountainous area and provides critical public safety coverage over portions of the San
6 Gabriel Valley and westward into the LA Basin and San Fernando Valley areas, and up through
7 the western portion of the Angeles National Forest. Those areas include population centers,
8 suburban communities, and forest and vegetated open spaces that are prone to wildfires during the
9 wildfire season, and dangerous mudslides during extreme wet weather conditions.

10 5. Unfortunately, LPC sustained on January 7, 2025 a Southern California Edison
11 (SCE) Public Safety Power Shutoff (PSPS) with an accompanying Southcoast AQMD Executive
12 Order 25-01. The LPC emergency generator ran for about 289.2 hours during this time which
13 included about 1.8 hours of runtime due to SCE's PSPS on the night of July 7, and 287.4 hours of
14 runtime from January 8 to February 6 when Southcoast AQMD Executive Order 25-01 was in
15 effect. The PSPS occurred at the same time that the Governor of California declared a State of
16 Emergency on January 7, 2025 related to the extreme wind and fire events:

17 https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf.

18 6. Thereafter, a second significant SCE maintenance outage associated with a pole
19 upgrade performed by SCE occurred for multiple days starting Friday, April 24, 2025. The LPC
20 ICE emergency generator started to run on April 24 and through the weekend into Monday, April
21 28. Upon further outage reporting and cause verification, it was found that the SCE maintenance
22 outage was scheduled for multiple days to end on May 1, 2025.

23 7. As of April 29, the LPC emergency generator total year-to-date runtime is 448.8
24 hours. Generator runtime excluding the 289.2 hours that occurred from January 8 to February 6,
25 2025 when South Coast AQMD Executive Order 25-01 was in effect and the 1.8 hours of SCE
26 PSPS on the night of July 7 is 160 hours. The SCE PSPS and the SCE maintenance outage which
27 accounted for most of the LPC emergency generator runtime are beyond LA-RICS Authority's
28

1 control. For the generator runtime as of April 29, only 3.7 hours are attributable to testing and
2 maintenance of LPC's IC Engine generator.

3 8. Subsequent to April 29, SCE implemented additional maintenance outages. As of
4 May 21 at 9 AM, the total year to date generator runtime is now 544.6 hours, inclusive of the
5 generator runtime during SCE PSPS and Southcoast AQMD's Executive Order 25-01. If we don't
6 count the hours covered by the SCE PSPS and Southcoast ADQMD's Executive order, the current
7 generation runtime is 255.4 hours.

8 9. As of May 21, 2025, the total year-to-date runtime has exceeded the permitted
9 annual operating limit of 200 hours. Further, monthly testing and maintenance of the generator for
10 the remainder of 2025 is estimated to be around 1 hour per month. Site LPC generator's runtime
11 has exceeded the limit stipulated in Permit to Operate Condition No. 4 due to SCE's current and
12 continued planned maintenance outages and possible unforeseen, unplanned power outages
13 between now and the end of the calendar year.

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

22 9. The LMR System radio network is required to stay "on air" 24/7 throughout the
23 year to support radio communications for the LA region's first responders for law enforcement,
24 fire service, and emergency medical services. When commercial utility power from SCE is lost,
25 LPC's automatic transfer switch on the emergency back-up generator starts and activates the
26 generator to allow for a continual supply of electricity to maintain network operations until
27 commercial utility power can be restored. Unfortunately, because of the SCE Power Shutoff
28 (PSPS) and the second major maintenance outage from April 24 to May 1, 2025 which were

beyond LA-RICS Authority's control that occurred in this year and accounted for the majority of generator runtime to date, we are over our 200 hour limit for calendar year 2025.

10. In order to maintain compliance, we need a variance to exceed the 200-hour limit this year. We are unable to control SCE's outage frequency and when they do maintenance on their infrastructure. We can only monitor and request updates from SCE to confirm when power is restored.

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

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

13. The emergency back-up generator at the site is programed and setup to immediately shut down upon restoration of commercial utility power using the automatic transfer switch (ATS). Outside of routine startup testing, excess emissions will drop to zero upon restoration of utility power. Test and maintenance of the LPC IC Engine generator has been reduced to stay below 1.0 hour a month since May 2025 in keeping with conditions in the approved Emergency Ex Parte Variance.

14. Given the public safety need of providing a back-up supply of power to the LPC site in the event of an outage so public safety operations are not impacted, the LA-RICS Authority

1 is seeking the variance now because it has exceeded the maximum allowed runtime of 200 hours
2 under Condition 4 of the Permit to Operate for the site LPC generator.

3 15. Without an interim variance, the LA-RICS Authority will continue to violate
4 District rule 203(b), which requires compliance with conditions in the Permit to Operate No.
5 G67048. Further, the LA-RICS Authority has violated Condition No. 4 of the Permit to Operate,
6 which has a maximum allowed runtime of 200 hours per year.

7 17. The LA-RICS Authority is currently subject to the Emergency Ex Parte variance
8 conditions that were issued on May 2, 2025, which allows it to operate the ICE for 1.0 hours for
9 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
11 need additional hours beyond those already used during the calendar year.

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

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct, and that this declaration was executed on May 21, 2025 in Arcadia,
19 California.

20 BY: Nancy Yang
21 NANCY YANG
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