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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
REGULAR VARIANCE AND WAIVER OF
FEES

Date: July 30, 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 Power Authority (LA-RICS Authority) as an information technology specialist. I
5 have been in this position for 3 months but was a telecommunications system consulting engineer
6 for the last 8 ½ years of the 12 years with the LA-RICS Authority. I am familiar with and have
7 reviewed the petition filed in support of Case No. 6234-6 and specifically with the equipment at
8 issue in this petition, Internal Combustion Engine (“ICE”) Permit to Operate (“P/O”) No. G67048
9 located at 16482U Santa Clara Truck Trail, Santa Clarita, CA 91321. Unless otherwise indicated,
10 the following facts are true of my own personal knowledge and if called upon to testify, I could
11 and would testify competently thereto.

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

16 3. The LMR System is a radio network dedicated entirely to first responders, such as
17 law enforcement, fire, and emergency medical services (EMS) personnel. The LMR System
18 creates a unified regional network of radio sites to provide communication services to first
19 responders. The network eliminates barriers that normally impede multi-jurisdictional responses
20 and allows police, firefighters and paramedics to communicate directly with other users outside of
21 their particular agency to streamline the response. Federal, State, and local agencies use the
22 network. The LMR System network was federally funded to include public-safety-grade
23 standards, with one specific attribute included that each site is backed-up by an emergency back-
24 up generator that will automatically start if the generator senses commercial power is lost at a 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 "emergency back-up generator"). This
4 emergency back-up generator is covered by Permit to Operate No. G67048. This LMR System
5 site is located in a mountainous area and provides critical public safety coverage over portions of
6 the San Gabriel 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, wildland-urban interface, and forest and vegetated open spaces that are
9 prone to wildfires during the wildfire season, and dangerous mudslides during extreme wet
10 weather conditions.

11 5. Unfortunately, LPC sustained on January 7, 2025 a Southern California Edison
12 ("SCE") Public Safety Power Shutoff ("PSPS") that continued multiple days with an
13 accompanying South Coast AQMD Executive Order 25-01. The LPC emergency generator ran
14 for about 289 hours during this time which included about 2 hours of generator run due to SCE's
15 PSPS on the night of July 7, and about 287 hours of run due to SCE's PSPS from January 8 to
16 February 6 when South Coast AQMD Executive Order 25-01 was in effect. The PSPS events
17 occurred at the same time that the Governor of California declared a State of Emergency on
18 January 7, 2025 related to the extreme wind and fire events: [https://www.gov.ca.gov/wp-](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf)
19 [content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf).

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

25 7. As of April 29 at 9AM, the LPC emergency generator's total year-to-date runtime
26 is 448.8 hours. Generator runtime excluding the 289 hours due to SCE's PSPS that occurred
27 between the night of January 7 and February 6 is 160 hours. Of the 160 hours of generator
28 runtime, 120 hours are due to SCE's maintenance outage for pole upgrade. The SCE PSPS and

1 the SCE maintenance outage, which accounted for 409 of the 448.8 hours and most of LPC's
2 emergency generator runtime as of April 29 just prior to filing of the petition on April 30, are
3 beyond LA-RICS Authority's control.

4 8. Subsequent to April 29, SCE implemented additional maintenance and planned
5 outages. As of July 22 at 9AM, the total year-to-date generator runtime is 574.8 hours, inclusive
6 of the generator runtime during SCE PSPS from the night of January 7 to February 6 that was
7 accompanied by South Coast AQMD's Executive Order 25-01. (*See attached LA-RICS LPC Loop*
8 *Canyon (SCAQMD Facility ID No. 195568) IC Engine Emergency Generator Runtime Report.*) If
9 we exclude the generator runtime of 289 hours due to SCE PSPS from the night of January 7 and
10 during South Coast AQMD's Executive Order 25-01, the current generator runtime is about 285
11 hours. Of the 285 hours, 277 hours are due to SCE's planned and unplanned power outages. Only
12 about 8 hours are attributable to testing, maintenance and emergency repair of LPC's ICE
13 emergency generator.

14 9. As of July 22, 2025, the total year-to-date emergency generator runtime has
15 exceeded the permitted annual operating limit of 200 hours. Monthly testing and maintenance of
16 the generator for the remainder of 2025 (estimated to be 0.7 to 1 hour per month) will further
17 increase the runtime exceedance. The generator's runtime has exceeded the limit stipulated in
18 Permit to Operate Condition No. 4 primarily due to SCE's previous and continued planned
19 maintenance outages as well as possible unforeseen, unplanned power outages between now and
20 the end of the calendar year.

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

1 9. The LMR System radio network is required to stay “on air” 24/7 throughout the
2 year to support radio communications for the LA region’s first responders for law enforcement,
3 fire service, and emergency medical services. When commercial utility power from SCE is lost,
4 LPC’s automatic transfer switch on the emergency back-up generator starts and activates the
5 generator to allow for a continual supply of electricity to maintain network operations until
6 commercial utility power can be restored. Unfortunately, because of the SCE PSPS between
7 January 7 and February 6, 2025 and the second major SCE maintenance outage from April 24 to
8 May 1, 2025 which were beyond LA-RICS Authority’s control that occurred this year and that
9 accounted for the majority of generator runtime to date, we are over our 200-hour yearly limit.

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

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

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

27 13. The emergency back-up generator at the site is programed and set up to
28 immediately shut down upon restoration of commercial utility power using the automatic transfer

1 switch ("ATS"). Outside of weekly startup testing, excess emissions will drop to zero upon
2 restoration of utility power.

3 14. Given the public safety need of providing a back-up supply of power to the LPC
4 site in the event of an outage so public safety operations are not impacted, the LA-RICS Authority
5 is seeking the variance now because it has exceeded the maximum allowed runtime of 200 hours
6 under Condition No. 4 of the Permit to Operate for the site LPC generator.

7 15. This regular variance request is in follow up to Case No. 6234-6, in which the
8 Hearing Board granted the LA-RICS Authority an interim variance from the emergency back-up
9 generator's emissions limitations on May 27, 2025, to allow 1.0 hours total of needed continued
10 maintenance and testing of the emergency back-up generator until a regular variance could be
11 obtained. The LA-RICS Authority is currently in compliance with those Interim Variance
12 Conditions. The LA-RICS Authority has reprogrammed the ATS for the emergency generator to
13 reduce frequency of generator exercise and functional testing so routine maintenance and testing is
14 less than 1.0 hour a month, and the generator is used only for emergency purposes. Two hours of
15 emergency use did occur in June 2025, where as a result of extended emergency generator run
16 since January under low load conditions that would ultimately result in critical, premature ICE
17 failure that could result in communications outage for first responders during a utility power
18 outage and thereby jeopardize public safety response, emergency service was performed on the
19 LPC ICE to protect against generator engine failure.

20 16. Without a regular variance, the LA-RICS Authority will continue to violate District
21 rule 203(b), which requires compliance with conditions in the Permit to Operate No. G67048.
22 Further, the LA-RICS Authority has violated Condition No. 4 of the Permit to Operate, which has
23 a maximum allowed runtime of 200 hours per year.

24 17. The LA-RICS Authority is currently subject to the interim variance conditions that
25 were issued per the interim variance hearing minute order dated June 10, 2025, which allows it to
26 operate the LPC ICE for 1.0 hours each month for maintenance and testing time. But the LA-
27 RICS Authority will continue to require time to maintain and test the ICE emergency generator.

1 Importantly, in case of an emergency, the LA-RICS Authority will need additional hours beyond
2 those already used during the calendar year.

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

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct, and that this declaration was executed on July 24, 2025 in Arcadia,
10 California.

11 BY: Nancy Yang
12 NANCY YANG
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EXHIBIT 1

LA-RICS LPC Loop Canyon (SCAQMD Facility ID No. 195568) IC Engine Emergency Generator Runtime Report, Variance Case 6234-6

AQMD Facility ID No. 195568	Alert Description/ Reason for Generator Run	Start	Stop	Duration(sec.)	Duration(min.)	Duration(hr.)	Cumulative(hr.)	SCAQMD PSPS Notification No.
LPC-NG	Generator: Online- Weekly Test	1/6/2025 7:58	1/6/2025 8:13	889	15	0.2469	0.2469	
LPC-NG	Generator: Online- SCE PSPS Event	1/7/2025 4:51	1/7/2025 4:56	298	5	0.0828	0.3297	
LPC-NG	Generator: Online- SCE PSPS Event	1/7/2025 22:11	1/7/2025 22:27	935	16	0.2597	0.5894	
LPC-NG	Generator: Online- SCE PSPS Event	1/7/2025 22:27	1/15/2025 12:37	655791	10930	182.1642	182.7536	
LPC-NG	Generator: Online- SCE PSPS Event	1/15/2025 12:39	1/16/2025 14:51	94305	1572	26.1958	208.9494	823988
LPC-NG	Generator: Online- Weekly Test	1/20/2025 7:58	1/20/2025 8:13	908	15	0.2522	209.2017	
LPC-NG	Generator: Online- SCE PSPS Event	1/20/2025 23:10	1/22/2025 10:01	125458	2091	34.8494	244.0511	
LPC-NG	Generator: Online- SCE PSPS Event	1/22/2025 12:15	1/24/2025 10:32	166633	2777	46.2869	290.3381	
LPC-NG	Generator: Online- Weekly Test	1/27/2025 7:58	1/27/2025 8:13	883	15	0.2453	290.5833	
LPC-NG	Generator: Online- Weekly Test	2/3/2025 7:58	2/3/2025 8:13	880	15	0.2444	290.8278	
LPC-NG	Generator: Online- Weekly Test	2/10/2025 7:58	2/10/2025 8:13	906	15	0.2517	291.0794	
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 10:50	2/10/2025 10:51	59	1	0.0164	291.0958	
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 11:19	2/10/2025 11:20	33	1	0.0092	291.105	
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 11:26	2/10/2025 11:40	866	14	0.2406	291.3456	
LPC-NG	Generator: Online- Preventive Maintenance	2/10/2025 11:41	2/10/2025 11:41	5	0	0.0014	291.3469	
LPC-NG	Generator: Online- Weekly Test	2/17/2025 7:58	2/17/2025 8:12	879	15	0.2442	291.5911	
LPC-NG	Generator: Online- Weekly Test	2/24/2025 7:58	2/24/2025 8:12	884	15	0.2456	291.8367	
LPC-NG	Generator: Online- Weekly Test	3/3/2025 7:57	3/3/2025 8:12	903	15	0.2508	292.0875	
LPC-NG	Generator: Online- Weekly Test	3/10/2025 7:57	3/10/2025 8:12	880	15	0.2444	292.3319	
LPC-NG	Generator: Online- Weekly Test	3/17/2025 7:57	3/17/2025 8:12	882	15	0.245	292.5769	
LPC-NG	Generator: Online-SCE Planned Power Outage	3/18/2025 8:22	3/18/2025 17:50	34061	568	9.4614	302.0383	
LPC-NG	Generator: Online- SCE Planned Power Outage	3/21/2025 8:05	3/21/2025 17:07	32510	542	9.0306	311.0689	
LPC-NG	Generator: Online- Weekly Test	3/24/2025 7:57	3/24/2025 8:12	905	15	0.2514	311.3203	
LPC-NG	Generator: Online- Weekly Test	3/31/2025 7:57	3/31/2025 8:12	891	15	0.2475	311.5678	
LPC-NG	Generator: Online- Weekly Test	4/7/2025 7:57	4/7/2025 8:12	878	15	0.2439	311.8117	
LPC-NG	Generator: Online- SCE Planned Power Outage	4/8/2025 8:16	4/8/2025 16:35	29926	499	8.3128	320.1244	
LPC-NG	Generator: Online- Weekly Test	4/14/2025 7:57	4/14/2025 8:12	905	15	0.2514	320.3758	
LPC-NG	Generator: Online- SCE Planned Power Outage	4/15/2025 8:08	4/15/2025 13:19	18665	311	5.1847	325.5606	
LPC-NG	Generator: Online- SCE Planned Power Outage	4/18/2025 8:01	4/18/2025 11:27	12378	206	3.4383	328.9989	
LPC-NG	Generator: Online- Weekly Test	4/21/2025 7:57	4/21/2025 8:12	908	15	0.2522	329.2511	
LPC-NG	Generator: Online- SCE Planned Power Outage	4/24/2025 9:25	5/1/2025 19:32	641221	10687	178.1169	507.3681	
LPC-NG	Generator: Online- Bi-monthly Test	5/5/2025 7:58	5/5/2025 8:17	1096	18	0.3044	507.6725	
LPC-NG	Generator: Online- SCE Planned Power Outage	5/12/2025 8:23	5/12/2025 14:01	20304	338	5.64	513.3125	
LPC-NG	Generator: Online- SCE Planned Power Outage	5/13/2025 8:10	5/13/2025 19:04	39256	654	10.9044	524.2169	
LPC-NG	Generator: Online- SCE Planned Power Outage	5/14/2025 8:22	5/14/2025 17:37	33296	555	9.2489	533.4658	
LPC-NG	Generator: Online- SCE Planned Power Outage	5/15/2025 8:11	5/15/2025 19:01	39011	650	10.8364	544.3022	
LPC-NG	Generator: Online- Bi-monthly Test	5/19/2025 7:58	5/19/2025 8:16	1086	18	0.3017	544.6039	
LPC-NG	Generator: Online- Bi-monthly Test	6/2/2025 7:58	6/2/2025 8:16	1087	18	0.3019	544.9058	
LPC-NG	Generator: Online- CUMMINS Servcie	6/2/2025 12:32	6/2/2025 14:09	5827	97	1.6186	546.5244	
LPC-NG	Generator: Online- CUMMINS Servcie	6/2/2025 14:10	6/2/2025 14:18	525	9	0.1458	546.6703	
LPC-NG	Generator: Online- CUMMINS Servcie	6/2/2025 14:19	6/2/2025 14:32	758	13	0.2106	546.8808	
LPC-NG	Generator: Online- SCE Maintenance Outage	6/5/2025 8:29	6/5/2025 16:39	29404	490	8.1678	555.0486	
LPC-NG	Generator: Online- Bi-monthly Test	6/16/2025 7:58	6/16/2025 8:16	1084	18	0.3011	555.3497	
LPC-NG	Generator: Online- SCE PSPS Event	6/17/2025 2:32	6/17/2025 9:39	25639	427	7.1219	562.4717	
LPC-NG	Generator: Online- SCE Maintenance Outage	6/21/2025 23:07	6/22/2025 10:48	42051	701	11.6808	574.1525	

LPC-NG	Generator: Online- Bi-monthly Test	7/7/2025 7:58	7/7/2025 8:16	1082	18	0.3006	574.4531	
LPC-NG	Generator: Online- Bi-monthly Test	7/21/2025 7:57	7/21/2025 8:15	1087	18	0.3019	574.755	