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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**
13

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. 6234-7
FACILITY ID No.: 195322

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. 6234-7 and specifically with the equipment at
8 issue in this petition, Internal Combustion Engine (“ICE”) Permit to Operate (“P/O”) No. G66628
9 located at 10875U Santa Clara Truck Trail, Canyon Country, CA 91390. Unless otherwise
10 indicated, the following facts are true of my own personal knowledge and if called upon to testify,
11 I could 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 10875U Santa Clara Truck Trail, Canyon Country, CA 91390 (known as
27 "Magic Mountain Link" or "MML"), Facility ID No. 195322, is one such site where an emergency
28 back-up 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. G66628. 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 Angeles National Forest past Castaic. Those areas include population centers, suburban
8 communities, wildland-urban interface, and forest and vegetated open spaces that are prone to
9 wildfires during the wildfire season, and dangerous mudslides during extreme wet weather
10 conditions.

11 5. Unfortunately, MML 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 MML emergency generator ran
14 for about 403 hours from January 8 to February 6 due to SCE PSPS when South Coast AQMD
15 Executive Order 25-01 was in effect. The PSPS events occurred at the same time that the
16 Governor of California declared a State of Emergency on January 7, 2025 related to the extreme
17 wind and fire events: [https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf)
18 [Fire_1-7-25_Formatted.pdf](https://www.gov.ca.gov/wp-content/uploads/2025/01/SOE_Palisades-Fire_1-7-25_Formatted.pdf).

19 6. Thereafter, a second significant SCE maintenance outage associated with a pole
20 upgrade performed by SCE occurred for multiple days. LA-RICS Authority received notification
21 on April 29, 2025 of an extended SCE planned maintenance outage that was estimated to start at
22 8AM on May 3 and end at 10AM on May 9, 2025, with an anticipated utility power outage of 146
23 hours during when the MML ICE generator was expected to run to supply power and sustain
24 operation of the LMR System for its first responder users. If SCE implements the maintenance
25 outage as planned and estimated, when utility power is restored and the emergency generator stops
26 running at 10AM on May 9, the expected cumulative generator runtime excluding the hours from
27 January 8 to February 6, 2025 when South Coast AQMD Executive Order 25-01 was in effect
28 would be 199 hours. Although it would still be below the 200-hour annual limit stipulated in

1 Condition No. 4 of P/O G66628, the runtime would have easily exceeded 200 hours if SCE's
2 maintenance outage was further extended or power cannot be restored as scheduled due to
3 unforeseen circumstances, and the 200-hour limit would have been exceeded with potentially
4 additional SCE planned and unplanned outages as well as LA-RICS Authority's anticipated future
5 testing and maintenance of the emergency generator for the remainder of the calendar year to
6 ensure equipment is in good working order. On Friday, May 2, 2025, LA-RICS took action to
7 request an Emergency Ex Parte variance when it anticipated a variance more than likely will be
8 needed to provide coverage until a publicly noticed hearing for an Interim and Regular Variance
9 could be scheduled. The variance petition was delivered after 5pm on May 2, 2025 and was
10 accepted by the Clerk of the Board on Tuesday, May 6, 2025

11 7. Subsequent to May 2, 2025, SCE implemented additional maintenance outages and
12 unscheduled outages had occurred. As of July 22 at 9AM, the total year-to-date generator runtime
13 is 581.5 hours, inclusive of the 403 hours of generator runtime due to SCE PSPS from January 8
14 to February 6 when South Coast AQMD's Executive Order 25-01 was in effect. *(See attached LA-*
15 *RICS MML Magic Mountain Link (SCAQMD Facility ID No. 195322) IC Engine Emergency*
16 *Generator Runtime Report.)* If we exclude the generator runtime of 403 hours due to SCE PSPS
17 that was concurrent with South Coast AQMD's Executive Order 25-01, the current generator
18 runtime is 178.5 hours. Of the 178.5 hours, about 173 hours are due to SCE's planned and
19 unplanned power outages. Only about 5.5 hours are attributable to testing, maintenance and repair
20 of MML's ICE emergency generator.

21 8. As of July 22, 2025 at 9AM for the current filing, the total year-to-date emergency
22 generator runtime has not exceeded the permitted annual operating limit of 200 hours after
23 excluding runtime during South Coast AQMD's Executive Order 25-01. However, there is a
24 potential that the 200-hour annual limit could be exceeded with anticipated future monthly
25 maintenance and testing of the MML ICE emergency generator for the remainder of 2025 and
26 additional SCE planned and unplanned outages until December 31, 2025. Therefore, Site MML's
27 emergency generator runtime could exceed the runtime limit stipulated in P/O Condition No. 4 for
28

1 additional SCE planned maintenance outages and possible unforeseen, unplanned power outages
2 that last multiple days between now and December 31, 2025.

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

11 10. The LMR System radio network is required to stay “on air” 24/7 throughout the
12 year to support radio communications for the LA region’s first responders for law enforcement,
13 fire service, and emergency medical services. When commercial utility power from SCE is lost,
14 MML’s automatic transfer switch on the emergency back-up generator starts and activates the
15 generator to allow for a continual supply of electricity to maintain network operations until
16 commercial utility power can be restored. Unfortunately, because of the SCE PSPS between
17 January 8 and February 6, 2025 and the second major SCE maintenance outage from May 3 to
18 May 9, 2025 which were beyond LA-RICS Authority’s control that accounted for the majority of
19 MML’s emergency generator runtime to date, there is a strong likelihood that LA-RICS Authority
20 will exceed the 200-hour limit for calendar year 2025, and a variance more than likely will be
21 needed.

22 11. In order to maintain compliance with the potential of additional future power
23 outages until the end of the calendar year, we need a variance to exceed the 200-hour limit this
24 year. We are unable to control SCE's outage frequency and when they do maintenance on their
25 infrastructure. We can only monitor and request updates from SCE to confirm when power is
26 restored.

27 12. If LA-RICS Authority is unable to operate the emergency generator during current
28 and future power outages for the year, it would pose a major public safety risk. Emergency

1 services rely on the LA-RICS LMR System network for wireless communication extending
2 throughout the remote regions of Los Angeles County. Losing power for MML would not only
3 hurt coverage for the localized area but would hurt system performance and reliability for the rest
4 of Los Angeles County due to critical microwave links site MML provides. If a variance is not
5 granted, the LA-RICS Authority, being a mission-critical communications system which supports
6 public safety communications for daily operation and emergency responses by the Los Angeles
7 region's first responders for law enforcement, fire, and emergency medical services, would have to
8 incur extensive fines and penalties when the 200-hour emergency generator runtime limit is
9 exceeded.

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

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

17 15. Given the public safety need of providing a back-up supply of power to the MML
18 site in the event of an utility outage so public safety operations are not impacted, the LA-RICS
19 Authority is seeking the variance now because potential, recurring utility outages over multiple
20 days between now and December 31, 2025 can easily cause the MML emergency generator to
21 overrun its 200-hour annual limit under Condition No. 4 of P/O No. G66628. The time it takes to
22 evaluate the outage data or obtain duration forecast and prepare for the variance petition may not
23 allow petitions to be completed and submitted before the 200-hour limit is exceeded which would
24 be in violation of Condition No. 4 of the permit to operate for site MML's emergency generator.

25 16. Without a regular variance, the LA-RICS Authority may potentially violate District
26 rule 203(b), which requires compliance with conditions in P/O No. G66628.

27 17. The LA-RICS Authority is currently subject to the interim variance conditions that
28 were issued in the interim variance hearing minute order dated June 10, 2025, which allows the

1 LA-RICS Authority to operate the MML ICE for 1.0 hours each month for maintenance and
2 testing time. But the LA-RICS Authority will continue to require time to maintain and test the
3 ICE emergency generator. Importantly, in case of an emergency or when MML's ICE failure is
4 likely and emergency services need to be performed on the generator so back-up power supply
5 continues to be available during unexpected utility outages, the LA-RICS Authority will need
6 additional hours beyond those already used during the calendar year. As an example, two hours of
7 emergency use did occur in June 2025, where as a result of extended emergency generator run
8 since January under low load conditions that would ultimately result in critical, premature ICE
9 failure that could result in communications outage for first responders during a utility power
10 outage and thereby jeopardize public safety response, emergency service was performed on the
11 LPC ICE to protect against generator engine failure.

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 July 24, 2025 in Arcadia,
19 California.

20 BY: Nancy Yang
21 NANCY YANG
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EXHIBIT 1

LA-RICS MML Magic Mountain Link (SCAQMD Facility ID No. 195322) IC Engine Emergency Generator Runtime Report, Variance Case 6234-7

| AQMD Facility ID No. 195322 | Alert Description/ Reason for Generator Run | Start | Stop | Duration(sec.) | Duration(min) | Duration(hr.) | Cumulative(hr.) | SCAQMD PSPS Notification No. |
|--|--|-----------------|-----------------|-----------------------|----------------------|----------------------|------------------------|---|
| MML-NG | Generator: Online- Weekly Test | 1/6/2025 7:47 | 1/6/2025 7:57 | 600 | 10 | 0.1667 | 0.1667 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/7/2025 22:11 | 1/7/2025 22:16 | 302 | 5 | 0.0839 | 0.2506 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/8/2025 10:42 | 1/15/2025 12:37 | 611715 | 10195 | 169.9208 | 170.1714 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/15/2025 12:38 | 1/18/2025 11:58 | 256822 | 4280 | 71.3394 | 241.5108 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/20/2025 6:57 | 1/24/2025 10:04 | 356852 | 5948 | 99.1256 | 340.6364 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/24/2025 22:46 | 1/26/2025 14:59 | 144803 | 2413 | 40.2231 | 380.8594 | |
| MML-NG | Generator: Online- Weekly Test | 1/27/2025 7:46 | 1/27/2025 7:56 | 602 | 10 | 0.1672 | 381.0267 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/30/2025 11:36 | 1/30/2025 11:36 | 41 | 1 | 0.0114 | 381.0381 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/30/2025 12:22 | 1/30/2025 12:23 | 34 | 1 | 0.0094 | 381.0475 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/30/2025 12:29 | 1/30/2025 12:39 | 607 | 10 | 0.1686 | 381.2161 | |
| MML-NG | Generator: Online- SCE PSPS Event | 1/30/2025 12:40 | 1/30/2025 12:41 | 42 | 1 | 0.0117 | 381.2278 | |
| MML-NG | Generator: Online- SCE PSPS Event | 2/2/2025 20:17 | 2/3/2025 15:59 | 70951 | 1183 | 19.7086 | 400.9364 | |
| MML-NG | Generator: Online- SCE PSPS Event | 2/4/2025 11:28 | 2/4/2025 13:41 | 7989 | 133 | 2.2192 | 403.1556 | 826151 |
| MML-NG | Generator: Online- Weekly Test | 2/10/2025 7:46 | 2/10/2025 7:56 | 600 | 10 | 0.1667 | 403.3222 | |
| MML-NG | Generator: Online- SCE Outage Service Ticket 5261867 | 2/13/2025 16:19 | 2/15/2025 17:20 | 176442 | 2941 | 49.0117 | 452.3339 | |
| MML-NG | Generator: Online- Weekly Test | 2/17/2025 7:46 | 2/17/2025 7:56 | 586 | 10 | 0.1628 | 452.4967 | |
| MML-NG | Generator: Online- Weekly Test | 2/24/2025 7:46 | 2/24/2025 7:56 | 590 | 10 | 0.1639 | 452.6606 | |
| MML-NG | Generator: Online- Weekly Test | 3/3/2025 7:46 | 3/3/2025 7:56 | 583 | 10 | 0.1619 | 452.8225 | |
| MML-NG | Generator: Online- Weekly Test | 3/10/2025 7:46 | 3/10/2025 7:56 | 585 | 10 | 0.1625 | 452.985 | |
| MML-NG | Generator: Online- Weekly Test | 3/17/2025 7:46 | 3/17/2025 7:56 | 601 | 10 | 0.1669 | 453.1519 | |
| MML-NG | Generator: Online- Weekly Test | 3/24/2025 7:46 | 3/24/2025 7:56 | 601 | 10 | 0.1669 | 453.3189 | |
| MML-NG | Generator: Online- Weekly Test | 3/31/2025 7:45 | 3/31/2025 7:56 | 608 | 10 | 0.1689 | 453.4878 | |
| MML-NG | Generator: Online- Weekly Test | 4/7/2025 7:45 | 4/7/2025 7:55 | 602 | 10 | 0.1672 | 453.655 | |
| MML-NG | Generator: Online- Weekly Test | 4/14/2025 7:45 | 4/14/2025 7:55 | 600 | 10 | 0.1667 | 453.8217 | |
| MML-NG | Generator: Online- Weekly Test | 4/21/2025 7:45 | 4/21/2025 7:55 | 601 | 10 | 0.1669 | 453.9886 | |
| MML-NG | Generator: Online- SCE Planned Outage | 4/26/2025 12:42 | 4/26/2025 14:21 | 5929 | 99 | 1.6469 | 455.6356 | |
| MML-NG | Generator: Online- Weekly Test | 4/28/2025 7:45 | 4/28/2025 7:55 | 601 | 10 | 0.1669 | 455.8025 | |
| MML-NG | Generator: Online- SCE Planned Outage | 5/3/2025 8:07 | 5/7/2025 11:41 | 358447 | 5974 | 99.5686 | 555.3711 | |
| MML-NG | Generator: Online- SCE Planned Outage | 5/8/2025 8:23 | 5/8/2025 13:50 | 19601 | 327 | 5.4447 | 560.8158 | |
| MML-NG | Generator: Online- SCE Planned Outage | 5/10/2025 8:06 | 5/10/2025 12:51 | 17103 | 285 | 4.7508 | 565.5667 | |
| MML-NG | Generator: Online- Weekly Test | 5/12/2025 7:45 | 5/12/2025 7:55 | 585 | 10 | 0.1625 | 565.7292 | |
| MML-NG | Generator: Online- SCE Planned Outage | 5/16/2025 8:06 | 5/16/2025 16:05 | 28730 | 479 | 7.9806 | 573.7097 | |
| MML-NG | Generator: Online- Weekly Test | 5/19/2025 7:45 | 5/19/2025 7:55 | 607 | 10 | 0.1686 | 573.8783 | |
| MML-NG | Generator: Online- Weekly Test | 5/26/2025 7:45 | 5/26/2025 7:55 | 601 | 10 | 0.1669 | 574.0453 | |
| MML-NG | Generator: Online- Weekly Test | 6/2/2025 7:45 | 6/2/2025 7:55 | 602 | 10 | 0.1672 | 574.2125 | |
| MML-NG | Generator: Online- CUMMINS Service | 6/5/2025 13:00 | 6/5/2025 15:01 | 7254 | 121 | 2.015 | 576.2275 | |
| MML-NG | Generator: Online- Bi-monthly Test | 6/16/2025 7:46 | 6/16/2025 8:04 | 1083 | 18 | 0.3008 | 576.5283 | |
| MML-NG | Generator: Online- SCE Unscheduled Outage #800425253 | 7/1/2025 10:29 | 7/1/2025 14:50 | 15627 | 260 | 4.3408 | 580.8692 | |
| MML-NG | Generator: Online- Bi-monthly Test | 7/7/2025 7:46 | 7/7/2025 8:04 | 1070 | 18 | 0.2972 | 581.1664 | |
| MML-NG | Generator: Online- Bi-monthly Test | 7/21/2025 7:46 | 7/21/2025 8:04 | 1083 | 18 | 0.3008 | 581.4672 | |