

May 28, 2025

Trish Clary  
Senior Director, Environmental Programs  
Union Pacific Railroad  
1400 Douglas Street  
Omaha, Nebraska 68179  
[TRCLARY@UP.com](mailto:TRCLARY@UP.com)

Dear Ms. Clary,

The California Air Resources Board (CARB) received Union Pacific Railroad's (UPRR) 2024 Fleet Average Agreement Annual Compliance Report (Compliance Report) pursuant to Section IV.B. of the 1998 Memorandum of Mutual Understanding and Agreements, South Coast Locomotive Fleet Average Emissions Program (1998 MOU). CARB staff have confirmed that for calendar year 2024 BNSF complied with the 1998 MOU requirement to achieve a final locomotive fleet average for oxides of nitrogen (NO<sub>x</sub>) under 5.5 grams per brake horsepower-hour (g/bhp-hr) in the South Coast Air Basin.

### **Compliance Evaluation: Calendar Year 2024**

UPRR's Compliance Report included the following:

1. Signed letter of certification verifying the information reported is true, accurate, and complete.
2. Fleet summary information regarding the methodology used to comply with the 1998 MOU (Form F-S).
3. Fleet average calculation showing the individual locomotive megawatt-hours (MWh) and emissions levels, as well as calculations and any necessary adjustments (Form F-A-1 through Form F-A-6).

UPRR's 2024 Compliance Report included activity information (in MWh) and emission levels for over 4,400 locomotives. For calendar year 2024, UPRR's final fleet average of 5.5g/bhp-hr meets the NO<sub>x</sub> compliance level set forth in the 1998 MOU by utilizing 0.23 of the ultra -low emitting locomotive credits or ULEL, UPRR's remaining ULEL balance is 22.27.

CARB will make the Compliance Report information publicly available except for individual locomotive activity levels, which are business confidential according to California Government Code Section 6254.7. The activity data will be aggregated by tier and emission level.

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If you have any questions or comments, please contact: Layla Gonzalez, Manager, Freight Systems Section at [Layla.Gonzalez@arb.ca.gov](mailto:Layla.Gonzalez@arb.ca.gov) or Jaskamal Kaur, Air Pollution Specialist, Freight Systems Section at [Jaskamal.Kaur@arb.ca.gov](mailto:Jaskamal.Kaur@arb.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Ajay Mangat', with a stylized, cursive script.

Ajay Mangat, Assistant Division Chief, Transportation and Toxics Division

cc: Tom Cappucci, Senior Manager of Environmental Programs, [tcappuc@up.com](mailto:tcappuc@up.com)  
Layla Gonzalez, Manager, Freight Systems Section, Transportation and Toxics Division  
Jaskamal Kaur, Air Pollution Specialist, Transportation and Toxics Division