

July 7, 2026

Trish Clary
Senior Director, Environmental Programs
Union Pacific Railroad
1400 Douglas Street
Omaha, Nebraska 68179
TRCLARY@UP.com

Dear Ms. Clary,

The California Air Resources Board (CARB) received Union Pacific Railroad's (UPRR) 2025 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 2025 UPRR complied with the 1998 MOU requirement to achieve a final locomotive fleet average for oxides of nitrogen (NO_x) under 5.5 grams per brake horsepower-hour (g/bhp-hr) in the South Coast Air Basin.

Compliance Evaluation: Calendar Year 2025

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 2025 Compliance Report included activity information (in MWh) and emission levels for over 4,300 locomotives. For calendar year 2025, UPRR's final fleet average of 5.5g/bhp-hr meets the NO_x compliance level set forth in the 1998 MOU by utilizing 0.21 of the ultra-low emitting locomotive credits or ULEL. UPRR's remaining ULEL balance is 22.06.

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 or Krivi Gupta, Air Resources Engineer, Freight Systems Section at krivi.gupta@arb.ca.gov.

Sincerely,



Skott Wall, Branch Chief, Freight Technology Advancement Branch, Transportation and Toxics Division

cc: Tom Cappucci, Senior Manager of Environmental Programs, tgcappuc@up.com

Layla Gonzalez, Manager, Freight Systems Section, Transportation and Toxics Division

Krivi Gupta, Air Resources Engineer, Transportation and Toxics Division