



March 14, 2025

Re: Supporting Thermal Transition Option 2b to Replace the University of Oregon's Polluting Gas Boilers

Dear President Scholz and members of the Board of Trustees,

With the federal government exiting the Paris Climate Agreement, declaring a “national energy emergency” to expand the oil and gas system, passing a slew of anti-climate Executive Orders, and preparing for other attacks on climate and environmental justice policy,¹ It is more important than ever that local institutions like the University of Oregon take actions to reduce their greenhouse gas (GHG) emissions by rapidly transitioning off of fossil fuels. In this context, the undersigned organizations write to express our disappointment in the University President's failure to make a recommendation at the March 2024 meeting to the University of Oregon (UO) Board of Trustees regarding the transition of the University's boiler system off of fossil fuels and urge them to do so now.

A. Introduction

According to the Oregon Department of Environmental Quality, the University's boiler system is the single largest source of climate-polluting emissions in the City of Eugene.² In FY 2023, the boiler system was the source of 49% of the University's total emissions.³ In order to meet the

¹ Melina Walling, “Here's what to know about Trump's executive actions on climate and environment.” PBS, January 27, 2025
<https://www.pbs.org/newshour/nation/heres-what-to-know-about-trumps-executive-actions-on-climate-and-environment>

² “Greenhouse Gas Emissions Reported to DEQ.” Oregon Department of Environmental Quality, 2020.

³ “UO Sustainability Dashboard: Air and Climate.” University of Oregon, 2023.
<https://sustainability.uoregon.edu/home/operations/air-and-climate/>

University's goal of carbon neutrality,⁴ and to comply with the climate goals of the City of Eugene⁵ and the State of Oregon,⁶ it is critical that the University takes action to transition the boiler system as quickly as possible.

Many of our organizations have previously supported the ambitious Option 4, as described by the Thermal Task Force Report,⁷ which has the greatest GHG reduction potential of the options studied. However, if Thermal Task Force's recommendation of "Option 2b" is the only feasible option at this time, we would be willing to support the replacement of the university's inefficient and outdated gas heating system with a single electrode boiler to reduce the boiler system's energy use by approximately 45%, provided the following conditions are met:

1. The Board commits, and develops a detailed plan, to reduce emissions from the boiler system and all building functions by at least 50% by 2030 and to fully electrify the boiler system and reduce emissions from all building functions by 95% no later than 2035, in line with the emissions reduction targets in the City of Eugene's Climate Recovery Ordinance,⁸ Governor Brown's Executive Order 20-04,⁹ and the 2022 report from the Intergovernmental Panel on Climate Change;¹⁰ and
2. The Board establishes a student climate action oversight board to ensure that student voices are engaged as decision-makers through this process.

Additionally, we are strongly opposed to the potential use of carbon offsets to reach the University's Climate Action Plan 2.0 goals, as discussed by the Board at the March 2024 meeting. Evidence is mounting that carbon offsets do not meaningfully reduce GHG emissions.¹¹ Specifically, the use of offsets and carbon markets has been shown to be susceptible to double-

⁴ Michael H. Schill, "University of Oregon's updated Climate Action Plan." University of Oregon, May 10, 2019. <https://president.uoregon.edu/university-oregons-updated-climate-action-plan>

⁵ "Climate Recovery Ordinance." City of Eugene, 2016.

<https://www.eugene-or.gov/3210/Climate-Recovery-Ordinance>

⁶ "Executive Order No. 20-04." State of Oregon, March 10, 2020.

https://www.oregon.gov/gov/eo/eo_20-04.pdf

⁷ "Thermal systems transition study task force." University of Oregon, 2023.

<https://cpfm.uoregon.edu/thermal-systems-transition-study-task-force>

⁸ Climate Recovery Ordinance." City of Eugene, 2016.

<https://www.eugene-or.gov/3210/Climate-Recovery-Ordinance>

⁹ "Executive Order No. 20-04." State of Oregon, March 10, 2020.

https://www.oregon.gov/gov/eo/eo_20-04.pdf

¹⁰ "Climate Change 2022: Mitigation of Climate Change." IPCC, April 4, 2022.

<https://www.ipcc.ch/report/sixth-assessment-report-working-group-3/>

¹¹ See, generally, Gabbatiss, Josh, et al. "In-depth Q&A: Can 'carbon offsets' help to tackle climate change?" (Carbon Brief, September 24, 2023), <https://interactive.carbonbrief.org/carbon-offsets-2023/>.

See also Probst, Benedict, et al. *Systematic review of the actual emissions reductions of carbon offset projects across all major sectors* (ETH Zurich Working Paper, 2023), <https://www.research-collection.ethz.ch/handle/20.500.11850/620307> ("We estimate that only 12% of the total volume of existing credits constitute real emissions reductions, with 0% for renewable energy, 0.4% for cookstoves, 25.0% for forestry and 27.5% for chemical processes. Our results thus indicate that 88% of the total credit volume across these four sectors in the voluntary carbon market does not constitute real emissions reductions.").

and triple-counting, and are primarily utilized as a means of maintaining *status quo* polluting practices and systems.¹² The only credible means of addressing the University's energy emissions is to transition its energy infrastructure off of polluting fossil fuels and onto renewable electricity.

We are in a deepening climate crisis, that the new federal administration intends to turn its back on if not actively worsen. We cannot further delay the transition off of fossil fuels like methane gas. As a leading public institution in our City, State, and region, the UO should take bold action to demonstrate that it is a leader in confronting the climate crisis.

B. Climate Science and Policy Requires Action on the Climate Crisis

The effects of the climate crisis are already being felt: 2024 was the hottest year on record,¹³ hurricanes battered the south-east¹⁴ following a summer where 1.4 million acres of Oregon land burned in wildfires – setting a new record for the state.¹⁵ Now, in the dead of winter, unseasonably dry and windy conditions laid the groundwork for the devastating Los Angeles fires.¹⁶ The Intergovernmental Panel on Climate Change stated that global net human-caused emissions of carbon dioxide need to fall by about 45 percent from 2010 levels by 2030 to stay below 1.5°C of global warming.¹⁷ The Paris Climate Accords aim to limit global warming to 1.5°C,¹⁸ and the state of Oregon is beholden to these goals by virtue of its membership in the US Climate Alliance.

The state of Oregon and the city of Eugene have set climate goals in line with this climate science. In 2020 the state of Oregon, under Governor Brown, committed to reducing

¹² Jessica Camille Aguirre, "The warring conmen at the heart of a €5bn carbon trading scam." The Guardian, June 4, 2024.

<https://www.theguardian.com/news/article/2024/jun/04/the-warring-conmen-at-the-heart-of-a-5bn-carbon-credit-scam>;

Nina Lakhani, "Corporations invested in carbon offsets that were 'likely junk', analysis says." The Guardian, May 30, 2024.

<https://www.theguardian.com/environment/article/2024/may/30/corporate-carbon-offsets-credits>

¹³ "2024 was the warmest year in the modern record for the globe." NOAA National Centers For Environmental Information, January 10, 2025.

<https://www.climate.gov/news-features/featured-images/2024-was-warmest-year-modern-record-globe>

¹⁴ "2024 Atlantic Hurricane Season Wraps Up." NOAA, November 25, 2024.

<https://www.nesdis.noaa.gov/news/2024-atlantic-hurricane-season-wraps>

¹⁵ Claire Rush, "Record-breaking wildfires scorch more than 1.4 million acres in Oregon, authorities say." Associated Press, August 9, 2024.

<https://apnews.com/article/oregon-wildfires-record-9454144518d25686fa70940331ffdbab>

¹⁶ Lauren Sommer, "Here's how climate change fueled the Los Angeles fires." National Public Radio, January 29, 2025.

<https://www.npr.org/2025/01/29/nx-s1-5273676/la-fires-climate-change-rainfall-extreme-weather>

¹⁷ "Global warming of 1.5°C." IPCC, October 8, 2018.

<https://www.ipcc.ch/2022/04/04/ipcc-ar6-wgiii-pressrelease/>

¹⁸ "The Paris Agreement." UNFCCC. <https://unfccc.int/process-and-meetings/the-paris-agreement>

greenhouse gas emissions to 45% below 1990s levels by 2035.¹⁹ The City of Eugene's Climate Recovery Ordinance set goals to reduce fossil fuel use in Eugene by 50% of 2010 levels by 2030.²⁰ The UO must drastically cut its emissions to meet its carbon neutrality goal and in order for Eugene and the state of Oregon to meet their climate targets.

C. The Gas System is Increasingly Expensive and Cannot Decarbonize

The price of gas is volatile, and it is likely that regional prices will continue to trend significantly upward as (i) more customers choose to transition to clean renewable electricity; (ii) Oregon's gas utilities seek to comply with the State's Climate Protection Program through expensive and investments in speculative technologies like biogas and hydrogen; and (iii) increased LNG exports adversely affect domestic gas supply. In recent years, NW Natural has repeatedly filed with the Oregon Public Utility Commission (OPUC) to increase rates. In 2024, the OPUC denied their request for an 18% rate increase, granting them a smaller increase of 4.7%.²¹ The utility is not only appealing this decision,²² but has also filed again for a 5.79% increase in 2025.²³ If granted, NW Natural customers will have seen an overall rate increase of over 55% since 2020.²⁴

When we consider the cost of gas we must also consider the cost to the climate and the future University students will inherit. While the Eugene Water and Electric Board maintains one of the cleanest electric grids in the nation, powered by around 90% renewable energy,²⁵ their gas counterparts are falling short of decarbonization targets and remain focused on false solutions. In March of 2024, the OPUC rejected the Integrated Resource Plans (IRP) of Oregon's three major gas utilities, citing their overreliance on "alternative fuels" to meet decarbonization goals. The plans were deemed "unreasonably optimistic" about future natural gas demand and OPUC Chair Decker stressed that electrification had to be a part of decarbonization planning.²⁶ Further

¹⁹ "Executive Order No. 20-04." State of Oregon, March 10, 2020.
https://www.oregon.gov/gov/eo/eo_20-04.pdf

²⁰ Climate Recovery Ordinance." City of Eugene, 2016.
<https://www.eugene-or.gov/3210/Climate-Recovery-Ordinance>

²¹ Charlotte Shuff, "Customers Win Big in NW Natural Rate Case." Oregon CUB, October 30, 2024.
oregoncub.org/news/blog/customers-win-big-in-nw-natural-rate-case/3056

²² NW Natural, "Petition For Judicial Review, Petition for Judicial Review of Public Utility Commission of Oregon Order No. 24-359" filed with the Oregon Court of Appeals on January 9, 2025,
<https://edocs.puc.state.or.us/efdocs/HKK/ug490hkk334418033.pdf>

²³ Jashayla Pettigrew, "NW Natural requests rate hike for Oregon customers starting in late 2025." KOIN News, December 31, 2024.
<https://www.koin.com/news/oregon/nw-natural-requests-rate-hike-for-oregon-customers-starting-in-late-2025/>

²⁴ According to August 2024 reporting from Oregon Public Broadcasting (<https://www.opb.org/article/2024/08/16/nw-natural-utilities-natural-gas-rate-hikes-price-increase/>), "NW Natural's rates have climbed by more than 50% since 2020." If that 50% is combined with the new rate case this number would be at least 55.79% since 2020 - this does not include potential increases if NW Natural's petition for judicial review of Public Utility Commission of Oregon is successful.

²⁵ "Where Your Power Comes From." Eugene Water and Electric Board, September 2021.
<https://www.eweb.org/your-public-utility/power-supply>

²⁶ Alex Baumhardt, "All gas companies in Oregon fail to gain approval for plans on meeting the state's climate goals." Oregon Capital Chronicle, March 15, 2024.

signaling a movement away from fossil fuel use in buildings, the OPUC also ordered NW Natural to phase out subsidies for new gas customers in their most recent general rate case.²⁷

Instead of supporting feasible decarbonization solutions such as electrification, utilities like NW Natural have focused on red herrings like “renewable” natural gas (RNG), hydrogen blending, and synthetic natural gas, all of which are not economically feasible and not scalable to the levels needed for meaningful decarbonization. In some cases, these so-called solutions can contribute more climate pollution than conventional natural gas. NW Natural was sued in October of last year for their “Smart Energy” offset program, which misled customers aiming to counteract the emissions from their gas use when instead, overall emissions and pollution increased.²⁸

The University has a moral and fiscal responsibility to its students to transition its campus to clean renewable energy and off of increasingly expensive, outdated, and polluting fuel sources. Installing an 8 MW electrode boiler to the University’s boiler system, like any major infrastructure upgrade, will come with an upfront cost. However, this cost would also be an investment in student’s futures and would demonstrate the University’s self-described commitment to “responsible purchasing, efficient resource usage, minimizing solid and hazardous waste production, and sustainable campus planning and design.”²⁹ Additionally, it would exemplify the “Environmental Resilience” tenet of the University President’s new strategic plan.³⁰

D. The University’s Energy Transition Offers an Opportunity to Utilize the Campus as a Living Laboratory

Decarbonizing the University of Oregon’s boiler system and transitioning campus as a whole off of fossil fuels is an inherently interdisciplinary issue, meaning the UO could advance its educational and research missions by bringing together varying educational departments as well as students, faculty, and classified staff from across the university to decarbonize campus. This will strengthen intra-institutional collaboration, generate valuable knowledge for the global decarbonization effort, and provide hands-on educational opportunities for future climate leaders. The UO can become a living laboratory generating the solutions and workers needed for the green transition.

<https://oregoncapitalchronicle.com/2024/03/15/public-utilities-commission-rejects-long-term-climate-plans-of-every-natural-gas-company-in-oregon>

²⁷ Monica Samayoa, “NW Natural ordered to phase out new gas connection subsidies by 2027.” Oregon Public Broadcasting, Oct. 28, 2024.

²⁸ Aidan O’Shea, “Northwest Natural Gas Customers Sue Over ‘Greenwashing’ in Smart Energy Program.” Farm STAND, October 10, 2024.

<https://farmstand.org/northwest-natural-gas-customers-sue-over-greenwashing-in-smart-energy-program/>

²⁹ “UO Sustainability Dashboard: Policy.” University of Oregon.

<https://sustainability.uoregon.edu/home/operations/>

³⁰ “Oregon Rising.” University of Oregon, 2024. <https://oregonrising.uoregon.edu/>

Peer competitor universities, such as UC Berkeley,³¹ UC Davis, UC Santa Cruz,³² Stanford University,³³ and UMass Amherst³⁴ are all touting their electrification process as a major educational benefit. In the recent Oregon Rising Strategic Plan, the UO outlined that it aims to be on the leading edge of education on environmental resilience.³⁵ If the UO truly wants to be a leader in climate education, electrifying campus and incorporating education into this process is necessary.

E. Concluding Recommendations:

In light of the information presented above, and on behalf of our combined membership, the undersigned organizations **strongly urge the University to:**

1. Implement Thermal System Transition Option 2B as rapidly as possible;
2. Commit to, and develop a detailed plan to, reduce emissions from the boiler system and all building functions by at least 50% by 2030, and fully electrify the boiler system and all building functions no later than 2035, in line with the emissions reduction targets in the City of Eugene's Climate Recovery Ordinance, Governor Brown's Executive Order 20-04, and the 2022 report from the Intergovernmental Panel on Climate Change; and
3. Establish a student climate action oversight board to ensure that student voices are engaged as decision-makers through this process.

Thank you for your consideration.

Signed,

Organizations:

Jack Dodson, Fossil Free UO campaign co-lead, UO Climate Justice League

Valentine Bentz, Co-Director, Radical Organizing and Activism Resource Center

Myna Bird, Co-Director, The UO Coalition Against Environmental Racism

Angelina Castro, Networking & Social Chair, LiveMove

³¹ "Clean Energy Campus: Living Lab." UC Berkeley. <https://cleanenergycampus.berkeley.edu/living-lab>

³² Julia Busiek, "How three UC campuses are phasing out fossil fuels." University of California, February 1, 2024. <https://www.universityofcalifornia.edu/news/how-three-uc-campuses-are-phasing-out-fossil-fuels>

³³ "A living lab." Stanford University Doerr School of Sustainability. <https://sustainability.stanford.edu/our-impact/living-lab>

³⁴ "UMass Carbon Zero." University of Massachusetts Amherst. <https://www.umass.edu/carbon-neutrality/about>

³⁵ "Oregon Rising." University of Oregon, 2024. <https://oregonrising.uoregon.edu/>

Ashton Pressman, Executive Committee member, UO Student Workers

Mae Bracelin, Chair, UO Young Democratic Socialists of America

Cloe Nymo, Club President, Bee Friendly Committee

Dana McCasland, Co-Director, Students for the Future of the Urban Farm

Robin Mae Bailey, Newsprint Editor, The Student Insurgent

Riley Goldstein, Communications Director, College Democrats at UO

Nora Black, Club President, EG350 South Eugene High School

Aya Cockram, Oregon Statewide Energy Transition Organizer, Breach Collective

Patricia Hine, President, 350 Eugene

Damon Motz-Storey, Director, Sierra Club Oregon Chapter

Wendy Woods, President, Electrify Corvallis

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Samantha Hernandez, Healthy Climate Program Director, Oregon Physicians for Social Responsibility

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Amelia DuDubose, Organizer, Fridays for Future Bend

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Bethany Cotton, Conservation Director, Cascadia Wildlands

Patrick Donaldson, Principal Architect, Harka Architecture

Anne Pernick, Senior Advisor, SAFE Cities at Stand.earth

Ariel Knox, Oregonizers

Helena Birecki, Interim Chair, Climate Reality Project, Portland Chapter

Britney VanCitters, Political & Organizing Director, Oregon League of Conservation Voters

Dineen Crowe, Campaign Manager, 350PDX

Brian Stewart, Co-Founder, Electrify Now

Elected Officials:

Jennifer Yeh, Eugene City Councilor Ward 4,

Matt Keating, Eugene City Councilor, Ward 2

Phil Barnhart, Oregon State Representative (2001-2019)