President Barofsky and Members of the Board,

The undersigned unions, student groups, and environmental and climate justice organizations are writing to voice our deep concern with the recently revealed "pilot" project between the Eugene Water and Electric Board (EWEB) and the University of Oregon (UO). Our understanding is that the project – about which neither EWEB nor the University have publicly released any information nor offered any opportunity for public comment – is an agreement for EWEB to purchase fossil fuel-derived electricity generated on the UO campus by a large methane gas turbine that would be turned on for this specific purpose. Steve Mital, Director of the University of Oregon's Office of Sustainability, said in a statement to students that the project is slated to increase fossil fuel use at the University by about 65%. Our organizations are extremely concerned about many aspects of this project and the process, or lack thereof, that led to its creation and implementation, including but not limited to:

1. The lack of public notice provided to EWEB ratepayers and an absence of any formal decision by elected EWEB Board Members;
2. The justifications that EWEB is making for purchasing this dirty energy, and specifically the utility's claims about the imminent threat of rolling blackouts;
3. The significant greenhouse gas emissions associated with the project, and the efforts by EWEB and UO to present this as an emissions reduction measure; and
4. The increased air pollution and public health impacts associated with dramatically expanding fossil fuel use on campus, including increased nitrogen oxide (NO_x) and fine particulate matter pollution in the campus area and across Eugene.

Public Process:

Climate action and the transition off of fossil fuels is a highly important issue to EWEB's constituents. For many years, there has been concerted advocacy and broad community support for EWEB to take action to reduce its reliance on electricity generated by fossil fuels, leading the Board to establish Strategic Direction Policy 15 (SD 15) in 2023, committing the utility to take an "active role in combating and mitigating the impacts of climate change."[1]

Additionally, for the past decade,[2] dozens of student groups, community organizations[3] and elected officials, including the former Mayor of Eugene and members of Eugene's delegation to the state legislature,[4] have encouraged the University of Oregon to decarbonize its gas system. In recent years, the University created a Thermal Systems Transition Study Task Force,[5] which commissioned technical studies exploring pathways to decarbonizing the boiler system, and

[1] EWEB, "Appendix B: EWEB's Climate Change Policy (SD15)" (Jan. 3, 2023), link.
[2] University of Oregon Climate Justice League, "CAP the Carbon: Winter 2017 - Fall 2018", link.
[3] UO Climate Justice League et al., *Letter to University of Oregon Board of Trustees re: Replacing the University of Oregon's Polluting Gas Boilers* (Dec. 1, 2022), link.
[4] University of Oregon Climate Justice League et al., *Letter to University of Oregon Board of Trustees and Thermal Task Force* (Nov. 2023), link.
[5] University of Oregon Campus Planning & Facilities Management, "Thermal Systems Transition Study Task Force", link.

which formally recommended that the University pursue the electrification of its boiler system at a Board of Trustees meeting in the spring of 2024.[6] Since hearing the recommendation, the Board has taken no action on the matter until rolling out the University's contentious pilot program earlier this year.

Because this is such a critically important and salient issue, and one with a long history of public engagement, it is particularly concerning that there was no public notice issued regarding this pilot program. The public deserves an opportunity to learn about the details of a proposed new source of electricity for the utility, and to provide public comment on it in order to inform the elected Board about the positions of their constituents. Additionally, it is critical that the Board is given an opportunity to consider and vote on any prospective investments by the Utility in new energy generation sources. In this case, there was neither public notice, nor an opportunity for public engagement, nor a public discussion or vote by the Board.

Misleading Claims About Energy Supply Shortage:

EWEB staff is claiming that the project is necessary to meet imminent energy shortfalls. Specifically, the Utility's justification for the new fossil fuel generation now hinges on a regional study by Energy and Environmental Economics (E3),[7] which projects a potential winter resource adequacy gap in the Pacific Northwest by 2030 under worst-case assumptions. In Oregon, that study is increasingly being cited by public institutions with binding climate commitments to defend fossil fuel expansion.

But the University of Oregon project exposes a disconnect between the rhetoric and the data. Neither the E3 study nor regional analysis supports the claim that Eugene faces an imminent local reliability crisis requiring new fossil generation.[8] EWEB itself has acknowledged that its long-term power supply contract with Bonneville Power Administration reduces capacity risk compared to prior projects and that the region's hydropower system delivers carbon-free energy precisely during cold weather events.[9] Analysis by GridLab further finds that the E3 study's load growth assumptions rely heavily on speculative data center demand and that near-term shortages are driven by regional, not local, conditions.[10] GridLab also concluded that demand response and load flexibility could address most near-term risks.[11] EWEB has direct experience with the success of demand response reducing load during times of high electrical use - in August 2023, the utility requested customers reduce energy use while experiencing a heat

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[6] Grey Kamasz, *New heating system recommendation finalized for Scholz's approval* (The Daily Emerald, Feb. 10, 2024), link.
[7] Energy and Environmental Economics, *Resource Adequacy and the Energy Transition in the Northwest – Phase 1 Results: Summary & FAQ* (Nov. 2025), link.
[8] Aaron Orlowski, *Energy shortfall of 9 gigawatts projected for the Northwest*, (EWEB, Dec. 18, 2025), link. Note that the claims in this blog are not supported by the studies that it cites.
[9] Aaron Orlowski, *EWEB secures $2.5 billion of reliable, affordable, carbon-free energy for customers* (EWEB, Nov. 24, 2025), link.
[10] Sylvan Energy Analytics, *Near-term winter resource adequacy challenges in the Pacific Northwest: A review of E3's Northwest RA Study Phase 1 and independent evaluation of near-term winter challenges* (Jan. 2026), link.
[11] *Id.*

wave-induced peak load, resulting in a significant voluntary reduction of energy use which lowered energy demand 10-15 megawatts lower than was expected.[12]

In practice, the UO gas turbine does not solve a demonstrated Eugene reliability problem. It does, however, lock in additional fossil fuel combustion, increase local air pollution, and directly conflict with Eugene's Climate Recovery Ordinance[13] and EWEB's own goal of delivering 95% carbon-free electricity by 2030.[14] This project, and the increasing fallout across the community offers a concrete, well-documented example of how abstract blackout narratives are shaping on-the-ground decisions in Oregon and increasing climate and air pollution, often without transparency or accountability.

Significant Climate Impacts of Pilot Project

The University of Oregon's boiler system is currently the single largest source of greenhouse gas emissions in the City of Eugene according to the Oregon Department of Environmental Quality.[15] EWEB's pilot project with the University will only increase those emissions. The project, which is using a large gas turbine to generate electricity while using the steam byproduct to supplement the steam boilers which heat the University, is slated to increase fossil fuel use at the University by about 65% according to a statement made by Steve Mital, Director of the University of Oregon's Office of Sustainability. Mital said that on an average January, the system would increase gas use from 43,000 million British thermal units (MMBTU) to 71,000 MMBTU, the equivalent of burning over 4 million pounds of coal according to the Environmental Protection Agency's Greenhouse Gas Equivalencies Calculator.[16]

As stated above, this increase in fossil fuels is in direct conflict with the City of Eugene's Climate Recovery Ordinance, which calls for a 50% reduction in community wide fossil fuel use by 2030.[17] It also conflicts with EWEB's Strategic Direction Policy 15 which sets a goal of 95% of the electricity they provide coming from carbon free sources by 2030.[18] EWEB's argument that the the University of Oregon's gas turbine would decrease regional grid GHG intensity is also highly speculative: EWEB's own analysis found that it would be less efficient than the least-efficient marginal resource about 30% of the time,[19] and regional grid emissions should further decline over time as the share of renewables is increased due to State policies such as HB 2021.[20]

Significant Air Pollution Impacts of Pilot Project

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[12] Aaron Orlowski, *EWEB's heat-driven call to conserve energy yields major savings* (EWEB, Aug. 24, 2023), link.
[13] Eugene City Code § 6.675, link.
[14] EWEB, "Appendix B: EWEB's Climate Change Policy (SD15)", *supra* note 1.
[15] Oregon Department of Environmental Quality, "Greenhouse Gas Emissions Reported to DEQ", link.
[16] United States Environmental Protection Agency, "Greenhouse Gas Equivalencies Calculator", link.
[17] Eugene City Code § 6.675, link.
[18] EWEB, "Appendix B: EWEB's Climate Change Policy (SD15)", *supra* note 1.
[19] EWEB, *University of Oregon & EWEB Generation Pilot,* link. Note that EWEB has yet to make this presentation available to the public.
[20] Oregon Public Utility Commission, "*HB 2021 Implementation Activities",* link

Beyond the climate impacts of this project, we are concerned about the public health implications of dramatically expanding the combustion of fossil fuels in the City of Eugene. A growing body of research has found that, when burned, fossil fuels such as methane gas releases toxic byproducts into the air,[21] including fine particulates ($PM_{2.5}$)[22] and nitrogen oxides (NO_x)[23] and have significant impacts on public health.[24]

Based on information provided by Lane Regional Air Protection Agency, between February 2023 and January 2024, the University's boiler system emitted 38.48 tons of general particulate matter, 10.49 tons of PM_{10}, 2.62 tons of $PM_{2.5}$, and 14.37 tons of NO_x.[25] Based on the EPA CO-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA), the business as usual air pollution from the UO boiler facility costs Lane County an average of $190,000 per year in public health impacts.[26] If we assume a rough increase in air pollution parallel to the proposed pilot's 65% increase in fossil fuels used at the facility, the air pollution costs would increase to $313,500 annually.

Conclusion

As our community increasingly experiences the impacts of the climate crisis, and in turn works to fight climate change by transitioning off of fossil fuels, it is critical that EWEB engages the community early and often with proposed actions regarding energy generation or purchase, and provides to the public rationale and justification for proposed actions, along with detailed analyses of the climate and health impacts associated with these proposals. The process, or lack thereof, around EWEB's new pilot with UO has been extremely problematic and opaque. Additionally, upon reviewing the impacts of the pilot, it is clear that this project is not aligned with the values of EWEB's ratepayers, its Board, the City of Eugene, or the State of Oregon. As such, we are calling on the Utility to immediately cancel this pilot, and instead look towards greater investments in renewable energy generation and storage, along with systems and policies to support demand response and increased energy efficiency.

Thank you for your consideration.

Signed,

Jennifer Smith, President, SEIU 503 Local 085

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[21] Physicians for Social Responsibility, *Fueling Sickness: The Hidden Health Costs of Fossil Fuel Pollution* (Nov. 5, 2025), link.
[22] Eli Brewer et al., *$PM_{2.5}$ and ultrafine particulate matter emissions from natural gas-fired turbine for power generation* 131 Atmospheric Environment 141 (Apr. 2016), link.
[23] United States Environmental Protection Agency, "1.4 Natural Gas Combustion", (Sep. 2020), link.
[24] Sierra Club, *The Harmful Impacts of Natural Gas on Public Health and the Environment*, link.
[25] Lane Regional Air Protection Agency, *Annual Report - University of Oregon Permit #208557 PSEL Rolling Pollutant Emissions & Fuel Usage* (February 2025) link.
[26] United States Environmental Protection Agency, "CO-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA)", link.

Kate Celis Mills, President, United Academics of the University of Oregon

Rye Davies, President, Graduate Teaching Fellows Federation

Jacob Gattone, President, University of Oregon Student Workers

Declan Zupo, Co-Lead, UO Climate Justice League

Jace Deininger & Isaak Ordaz, Co-chairs, UO Young Democratic Socialists of America

Rachel Wallace, member, UO Rising Project

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

Krystal Abrams, Program Director, Beyond Toxics

Dylan Plummer, Acting Deputy Director of the Clean Heat Campaign, Sierra Club

Aya Cockram, Oregon Energy Transition Organizer, Breach Collective

Meredith Tufts, Coalition Coordinator, Fossil Free Eugene

Patricia Hine, Co-President, 350 Eugene

Bethany Cotton, Conservation Director, Cascadia Wildlands

Stan Taylor, Leader, Indivisible Eugene Springfield

Dave Cobar, Program Coordinator, ZERO Coalition

Stan Taylor, Leader, Indivisible Eugene Springfield

Amanda Duncan, Legislative Committee of Climate Reality Portland Chapter

Mike Reed, member, UUFCO Environmental Justice Team