



## MEMORANDUM

**DATE:** December 19, 2025

**TO:** Jeff Paschall, Community Development Division Director

**FROM:** Dan Hurley, Lane County Public Works Director

**SUBJECT:** Regional Wastewater Expansion Work Session

**ACTION**

**REQUESTED:** Feedback on proposed Metro Plan amendment options

**ISSUE**

The Lane County Board of Commissioners (BCC) has been exploring the potential for development / redevelopment in the unincorporated community of Goshen for more than a decade, with significant analysis into options for providing wastewater services to the area. County staff last held a work session with Springfield City Council on May 8, 2023, to discuss extending wastewater services from the Metropolitan Wastewater Management Commission (MWMC) regional wastewater system to serve Goshen and the Short Mountain Landfill.

Since the last work session, the City of Creswell has identified a connection to the Metropolitan Wastewater Management Commission (MWMC) regional wastewater system as their preferred long-term strategy for wastewater management. The City of Creswell has been working with Lane County over the past year to define the combined needs for a wastewater conveyance system that would include flows from the City of Creswell, the unincorporated community of Goshen, and leachate from the Short Mountain Landfill. Lane County has also worked with the City of Springfield, the City of Eugene, and MWMC over this period to better understand issues around existing system capacity and connection costs to address concerns about the potential impacts to existing MWMC ratepayers.

On November 14, 2025, Lane County and City of Creswell staff updated the Metropolitan Wastewater Management Commission on the regional wastewater expansion project and a proposed using the MWMC SDC methodology for future connection costs along with a five percent out-of-network surcharge for the potential new flows. MWMC supported the connection cost proposal and endorsed continuing

the conversation for necessary approvals to the elected bodies of Springfield, Eugene, and Lane County.

Very recently, Junction City approached Lane County with interest in exploring the potential for connection to the MWMC system to resolve their current wastewater challenges. The BCC has not yet taken up the issue for discussion.

Lane County plans to sponsor an amendment to the Eugene-Springfield Metro Plan to allow wastewater services to be provided outside of the current service area. County staff plans to discuss the proposed wastewater expansion project with Springfield City Council and gauge support for potential options for the Metro Plan amendment.

## **BACKGROUND**

The unincorporated community of Goshen is located just south of the Eugene/Springfield metro area and contains more than 300 acres of industrially zoned land. The area has unique attributes including easy access to major transportation facilities (rail/highway/interstate) and close proximity to labor markets, making it an ideal area for industrial development rarely found in Oregon. Recognizing these attributes, the State of Oregon designated Goshen as a Regionally Significant Industrial Area (RSIA); however, a lack of infrastructure (particularly wastewater) presents a significant barrier to development and investment.

Lane County has been working with consultants from Kennedy Jenks since 2014 to assess the feasibility of providing wastewater services to Goshen. Through these studies, the County determined that the most cost-effective method for providing wastewater services would be to connect to the Metropolitan Wastewater Management Commission (MWMC) wastewater system. At this time, MWMC policy does not allow for connections to Goshen because the area is outside the currently-defined service boundary.

The history of the Goshen wastewater project extends to 2011, when the County sought to facilitate regional economic development in the area. At that time, the BCC identified development in Goshen as a strategic goal and estimated that 2000-3000 industrial manufacturing jobs could be created on the existing industrial lands. To realize this goal, Lane County developed the Goshen Region Employment and Transition (G.R.E.A.T.) Plan that included obtaining an Oregon Statewide Land Use Planning Goal 14 (Urbanization) exception and a zoning change to allow urban levels of industrial development, to permit better utilization of the area's unique characteristics.

In 2015, the County completed a Wastewater Feasibility Study to demonstrate the feasibility of providing wastewater service to the Goshen area. The 2015 Study recommended connection to the Metropolitan Wastewater Management Commission (MWMC) regional system as it had the lowest cost and highest environmental benefits of the three alternatives considered for wastewater treatment.

In 2017, the County completed a Financial and System Administration Study that estimated connection charges for the MWMC connection. The 2017 Study also identified system administrative functions that would be required for the operation of the Goshen wastewater system. The 2017 Study reviewed several alternatives for system governance, ultimately recommending the Goshen facilities to be incorporated into the MWMC regional system, with allocation of O&M and administrative functions to regional partners City of Eugene and City of Springfield.

In August 2018, the BCC directed Lane County staff to pursue the next phase of work on a wastewater feasibility study. This phase, called the Project Definition phase, included updating construction cost estimates, development of a permitting plan and project schedule, and recommendations for proposed pipelines and pump stations.

In November 2019, Lane County provided a project overview to the MWMC, noting that an amendment would be needed to the Metro Plan and the Intergovernmental Agreement (IGA) established by the MWMC governing bodies to allow a wastewater connection to service the Goshen area. With a connection to Goshen, the trucking of leachate from the Short Mountain Landfill to the Glenwood receiving station could be eliminated, via a piped conveyance to Goshen and the MWMC system.

In February 2022, Lane County completed a Project Definition Report (PDR), that refined the conceptual planning and financial estimates from the 2015 and 2017 studies. The PDR includes route evaluations for gravity sewers and pressure force mains as well as capital cost estimates, connection costs estimates, and a Permitting Plan with anticipated timelines.

In early 2023, Lane County conducted work sessions with the City of Springfield and the City of Eugene, and on April 4, 2023, Lane County facilitated a meeting of the Joint Planning Commission with planning commissioners from the City of Springfield, the City of Eugene, and Lane County. Each of these entities expressed the need for more information about existing capacity in the system and more information on connection charges to ensure that current ratepayers would not be negatively impacted by allowing new connections outside of the existing service area.

In November 2024, Lane County received a presentation from the City of Creswell on the City's wastewater system and held a discussion on the feasibility of Creswell connecting to the MWMC system. The City of Creswell's wastewater treatment plant is currently unable to meet discharge permit requirements from the Department of Environmental Quality (DEQ). The City of Creswell is operating under a Mutual Agreement and Order (MAO) with the DEQ and must upgrade their treatment facility if they are not able to connect to the MWMC regional system. The Board discussed the challenges that the City of Creswell is facing with a moratorium on new housing and potential public health risks of wastewater system discharges into the local waterway. The City of Creswell also submitted a Facility Plan to DEQ in December 2024 identifying connection to the MWMC system as the preferred compliance strategy.

In December 2024, the BCC approved initiating an amendment to the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) to authorize an extension of MWMC services to the City of Creswell and to submit a five-million-dollar Water Resources Development Act (WRDA) funding request to the U.S. Army Corps of Engineers for design services related to extension of a sewer line to Creswell.

Throughout 2025, as Creswell's wastewater issues have risen to a State-level concern, the Governor's Office of Regional Solutions facilitated numerous conversations with stakeholders. Three workgroups were formed to explore potential financing for construction, to coordinate work on a Metro Plan amendment, and to advance engineering designs.

In October 2025, Kennedy Jenks and the Galardi Rothstein Group (GRG) provided connection cost estimates for Goshen, the Short Mountain Landfill, and the City of Creswell utilizing the MWMC SDC Methodology. The cost estimates were based on a 2017 study that was updated in 2019 and again in 2023.

In November 2025, staff briefed the Metropolitan Wastewater Management Commission (MWMC) to update the Commission and explore support for expanding the scope of the project to include Creswell. Staff also proposed using the MWMC SDC methodology for calculating connection costs and proposed a five percent out-of-network surcharge for ongoing operations costs. MWMC was supportive of adding Creswell to the expansion project and supported the proposed connection cost approach. MWMC committed to preparing a letter of support to assist with upcoming land use discussions

## ***DISCUSSION***

**Metro Plan:** Extending sewer lines beyond the Eugene-Springfield UGB would require a "Type III" Metro Plan amendment. All Metro Plan amendments are complex undertakings, but Type III amendments are the most involved and time consuming. Pursuant to Chapter IV, Policy 6(b) of the Metro Plan, Type III amendments require approval by Eugene, Springfield and Lane County. This process entails separate joint public hearings by the planning commissions and the elected officials of all three governing bodies.

If an amendment is approved, each of the three governing bodies must adopt substantively identical ordinances with supportive findings of fact. When there is not consensus for a Type III amendment it must be referred to the Chair of the Lane County Board of Commissioners and the Mayors of Eugene and Springfield for further examination of the issue(s) in dispute and recommendation back to the governing bodies. Adopted or denied Metro Plan amendments may be appealed to the Oregon Land Use Board of Appeals (LUBA) or the Department of Land Conservation and Development (DLCD) according to applicable state law.

Typical Type III amendment processes can span several months and require the involvement of planning and legal staff of each jurisdiction. As with most land use matters, any amendment to the Metro Plan that are deemed controversial can require

multiple public hearings and undergo multiple rounds of appeal and remand proceedings.

Previously hearing support from MWMC for expansion to serve Goshen and the Short Mountain Landfill, Lane County intends to move forward with hearings, deliberations, and land use actions to pursue a Metro Plan amendment. The extension to Creswell, has developed as an additional possibility since the last update to the Springfield City Council. Lane County staff would like to hear if the Council is supportive of including Creswell in the proposed Metro Plan amendment. A separate extension to Junction City has recently emerged as a desire by Junction City. Lane County staff would like to hear if the Council is supportive of including Junction City in the proposed Metro Plan amendment.

Current Metro Plan language does not allow sewer outside a UGB, with some limited exceptions. The proposed Metro Plan amendment would authorize MWMC to extend wastewater services outside of its current service boundary to the rural unincorporated community of Goshen, the Short Mountain Landfill, and the City of Creswell. The Metro Plan amendment would require approval by each of the MWMC jurisdictions (Eugene, Springfield, and Lane County). Lane Code updates will also be required to prohibit additional connections outside the urban growth boundary (UGB) and would only be adopted by the County.

Consistent with Statewide Planning Goals 11 (Public Facilities and Services) and 14 (Urbanization), Oregon administrative rules, and state statute, the Metro Plan generally prohibits extension of urban-level public facilities outside the UGBs. There are exceptions to these rules, for example there is a specific provision of OAR 660-011-0060 for extending wastewater service for the transport of leachate. The Metro Plan already includes exceptions to the general rule of extending wastewater service outside the UGB. Policy G.26 of the Metro Plan currently provides several exceptions to that general rule, as follows:

“Wastewater and water service shall not be provided outside the UGB except to the following areas, and the cities may require consent to annex agreement as a prerequisite to providing these services in any instance:

- a. The area of the Eugene Airport designated Government and Education on the *Metro Plan Diagram*, the Seasonal Industrial Waste Facility, the Regional Wastewater Biosolids Management Facility, and agricultural sites used for land application of biosolids and cannery byproducts. These sites serve the entire metropolitan area.
- b. An existing development outside the UGB when it has been determined that it poses an immediate threat of public health or safety of the citizens within the UGB that can only be remedied by extension of the service.

In addition, under prior obligations, water service shall be provided to land within the dissolved water districts of Hillcrest, College Crest, Bethel, and Oakway.”

Policy G.26 is proposed to be amended to include the Short Mountain Landfill site, the Goshen area, and the City of Creswell to the list of areas outside the UGBs to which wastewater services will be allowed. Several other policies would also be amended to ensure consistency with the amendments to Policy G.26.

**Financial Considerations:** Construction costs in 2023 dollars total \$72.6 - \$79.9 million. These costs are detailed as follows:

**Goshen:** Springfield to Goshen conveyance: \$32.9M-36.5M. This includes the Goshen Collection System, Pump Stations and Force Mains (\$21.4M) and MWMC connection charges (\$11.5M to \$15.1M). These estimates have not been updated to include costs up upsizing piping and pump stations for accommodating Creswell flows. The estimates include an allowance of 25 percent for soft costs, such as engineering, administrative, permits, and legal.

**Creswell:** Goshen to Creswell conveyance: \$39.7M-43.4M. This includes City-owned infrastructure improvements (\$19.3M), Goshen system upgrades (\$7.3M), MWMC connection charges (\$10M-13.7M), and a Springfield connection charge (\$3.1M).

**Junction City:** The potential for connecting Junction City has emerged as a very recent conversation. Lane County has not received costs estimates from the City.

**Connection Costs:** Lane County and the City of Creswell proposed that MWMC and the City of Springfield use their existing System Development Charge (SDC) methodology for calculating connection costs. SDCs are assessed on all new development that connects to MWMC's regional wastewater system. The MWMC SDC model follows a methodology that was developed in accordance with Oregon SDC legislation (ORS 223.297-223.316), and includes a reimbursement for existing facilities, as well as recovery of future facility costs needed to expand system capacity to serve new development. MWMC will be updating their SDC model in 2026. Lane County and the City of Creswell understand that connection cost estimates will need to be updated at the time of connection to align with the updated model. MWMC supported the proposed methodology, and that timing of connection payments will be tied to timing of when flows come online. MWMC also supported a proposed five percent out-of-network surcharge on rates. City of Springfield staff supported using the City's SDC current methodology to assess connection costs for the Franklin/McVey trunk line

**Funding:** Lane County is working with the Governor's Office of Regional Solutions to identify potential funding sources for the project. Potential funding maybe be available through several State and Federal grant/loan programs. Lane County has submitted five-million-dollar Water Resources Development Act (WRDA) funding request to the

U.S. Army Corps of Engineers for design services. Federal funding authorization is being sought to initiate the design services.

**Capacity:** In August 2025, Jacobs Solutions, Inc. presented a report to MWMC on a Preliminary Evaluation of Additional Creswell/Goshen Loads on MWMC System Capacity. The evaluation utilized projected flow and load estimates provided by Lane County and the City of Creswell to determine the capacity impacts of potential additional flows and loads from Creswell/Goshen. Flows and loads were modeled under elevated buildout conditions through 2045 completed for the MWMC Comprehensive Facilities Plan Update. At a high-level, the evaluation found that the system has adequate existing capacity except for the Glenwood Pump Station and Force Main. Other system impacts included shortening the timeline for needing a fifth anaerobic digester by six years and additional annual dewatering operating hours with existing Belt Filter Press equipment. Additional analysis is needed to assess the potential capacity limitations of the Glenwood Pump Station and Force Main.

City of Springfield staff have indicated that there may be capacity limitations in the Franklin/McVey trunk line that would serve as a conveyance between the combined Creswell/Goshen/County Landfill system and the MWMC system. Additional analysis is needed to determine the degree and timing of the capacity constraints. Given that flows from Goshen will likely be added over several decades as development occurs, upsizing may not be needed for decades. Lane County understands that it will need to bear the cost for upgrades to the Franklin/McVey trunk line when/if that becomes necessary.

## ***RECOMMENDATIONS***

1. Consider support to extending wastewater services to Goshen, the Short Mountain Landfill, the City of Creswell, and Junction City.
2. Further evaluate potential capacity concerns for the Franklin/McVey Trunk Line and the Glenwood Pump Station and Force Main identified in the preliminary analysis.

## ***ACTION REQUESTED***

Lane County requests the City Council indicate their level of support for extending wastewater services to serve each of the proposed expansion areas: Goshen, the Short Mountain Landfill, the City of Creswell, and Junction City.

Lane County will use this information to shape the proposed amendment to take to the Planning Commissions of Springfield, Eugene, and Lane County, for future consideration by each of the elected bodies.