

## Kitsap County Public Works Sewer Division (Nick Martin)



## KITSAP COUNTY PUBLIC WORKS

614 DIVISION STREET (MS-26), PORT ORCHARD, WA 98366-4699 | KITSAP1: 360.337.5777 | KITSAP.GOV

August 27, 2025

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Jeremy Reiman, Water Quality Scientist

Washington Department of Ecology

PO Box 47600

Olympia, WA 98504-7600

RE: Kitsap County Comments on Draft Puget Sound Nutrient Reduction Plan

Dear Mr. Reiman:

Kitsap County (County) appreciates the opportunity to comment on the Washington State Department of Ecology (Ecology) Draft Puget Sound Nutrient Reduction Plan, dated June 2025 (Publication 25-10-038) (Draft Plan).

The County supports Ecology's intent to improve water quality in Puget Sound. As part of the County's "water is a resource" policy, in 2012 the County proactively invested in nutrient removal at its Central Kitsap Treatment Plant (CKTP) to improve water quality discharged to Puget Sound, and to set the stage for a potential reclaimed water program partnership with Silverdale. We support preserving and enhancing water quality in Puget Sound and expect to continue making justified investments to that end.

We want to partner with Ecology to ensure that investments in nutrient removal are science-based and will result in meaningful and sustainable positive impacts to the environment. Please consider the following general comments.

- The provided guidance is limited in detail and doesn't provide adequate background and rationale to fully assess the implications to our utility.
- The plan doesn't draw a strong link between the significant investments that would be required and meaningful water quality benefits.
- The projected investments that would be required will result in major affordability concerns for ratepayers within Kitsap County and throughout Puget Sound.
- The analysis should consider the cost/benefit ratio of varying levels of treatment/nutrient reduction to account for the law of diminishing returns.
- The County is concerned that the timeline for implementation may not be achievable considering the schedule required to plan, design, and construct these major facilities during a time when there will be limited consulting and construction resources across the region.

We appreciate the opportunity to comment on the Puget Sound Draft Nutrient Reduction Plan and welcome the opportunity to discuss these comments with Ecology. In the end, we are advocating for justified science-based regulations to guide future investments that will achieve ecologically and socially sustainable solutions.

Sincerely,





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