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Instream projects (fish barrier removal, in-stream habitat, etc.) should qualify for fulfillment of this permit requirement. This is because they can provide significantly more improvement for aquatic species than upstream pollution control alone. For example, cleaner water sent to horrible habitat is still horrible habitat which doesn't promote salmonid spawning success. Additionally, cleaner water sent to great habitat which is restricted for from use by salmonids reduces the effectiveness of the water quality improvements upstream. Permittees were required to look at these types of issues and associated projects in the SMAP development required of the current permit and for which many permittees included associated instream projects in their SMAP (this alone should be the nexus to allow for this). As such, not allowing for implementation of these projects to fulfill the "level of effort" requirements of this proposed permit requirement is a disconnect from what was asked by Ecology in watershed planning of the current permit. With limited resources available, not allowing instream projects to count toward level of effort will ultimately result in delay of important instream projects that may provide much more benefit to aquatic species than upstream water quality projects alone. There are plenty of ways to draw a nexus between in-stream projects and the municipal stormwater permit (i.e. existing impervious surfaces contribute to higher peak instream flows resulting in undersized culverts being restrictive to fish passage.... Or legacy sediment loading to streams from lack of upstream pollutant removal contributes to deterioration of the streambed in downstream receiving waters which needs to be replaced with appropriate streambed material necessary for salmonid spawning).