

## Anonymous Anonymous

If a permittee goes above the required level of effort in a permit cycle, that additional level of effort above what the permit requires should be able to accumulate "Bank" and apply toward level of effort in future permit cycles. If banking is not allowed, it will discourage permittees from installing larger facilities and/or regional facilities which exhibit a much larger up front cost but are ultimately much more cost efficient at pollutant removal than spending the same amount of dollars on implementation of many smaller facilities over a longer period of time. Not allowing level of effort "banking" between permit cycles to encourage a greater level of effort from permittees sooner than later eliminates an incentive for installing such larger scale facilities and subsequently will delay associated water quality improvements when spreading out over a longer period of time.