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Ecology needs to ensure that level of effort points awarded for "non-structural BMPs" is sufficient to give municipalities (especially small municipalities) better opportunity to comply with these proposed permit requirements. Doing so will also provide more incentive for permittees to adopt important land management strategies/codes (i.e. limitations on percent impervious/or further limitations within a property, smaller development thresholds for requiring stormwater facilities than what is required by the permit, etc.) which in the big scheme of things could provide much more long lasting improvement to water quantity and quality than individual retrofits and structural BMPs within a single permit cycle conducted by the permittee.