

## Agency

There should not be a 50% cap on MS4 pipe cleaning, additional sweeping, and other enhanced maintenance activities toward fulfilling level of effort requirements. Studies have shown (see City of Tacoma study) that this type of enhanced maintenance is much more cost efficient at removing pollutants than retrofits/etc. This is especially true when considering many small municipalities likely do not currently provide routine pipe cleaning and/or street sweeping do to resource constraints. Removing the 50% level of effort cap on enhanced maintenance (at least within the first permit cycle of these requirements) provides much more opportunity for low revenue, small municipalities to comply through a cost efficient approach to pollutant removal and provide more incentive for removal of "legacy pollutants" within pipe networks which have never been cleaned. This would also provide small permittees more appropriate time to gather resources/funding and properly prepare to implement retrofits in future permit cycles (especially if in house engineering is not currently present or limited).