

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

Stormwater Retention Credit Program

Fiscal Year 2020-2021 Summary Report

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Summary

Managing stormwater in the District of Columbia (the District) is critical to the health of local rivers and streams. The Department of Energy and Environment's (DOEE's) stormwater management regulations provide large development projects with flexible options for meeting the stormwater management requirements of the District's regulations.

Major regulated projects must achieve a stormwater retention volume (SWRv) calculated with either a 0.8- or 1.2-inch design storm -- depending on the size and scope of the project. Projects must install green infrastructure (GI) to retain stormwater on site but also have the flexibility to meet a portion of the SWRv with GI installed elsewhere in the District. The quantity of SWRv that will be met somewhere else, or off-site, is referred to as the Off-site Retention Volume (Offv). Offv requirements are typically met by purchasing Stormwater Retention Credits (SRCs) on the open market; however, a project can use its own SRCs to achieve its Offv or pay an in-lieu fee (ILF) to DOEE.

Most regulated projects must comply with at least 50 percent (50%) of the required SWRv on site, although an exception is made for projects in areas of the District served by the Gray Combined Sewer System (Gray CSS). In the Gray CSS, stormwater drains to underground storage tunnels and is then conveyed to the District's advanced wastewater treatment plant. As of January 2020, projects located in the Gray CSS have the flexibility to meet their entire SWRv off-site, provided they use SRCs generated within the boundaries of the Municipal Separate Storm Sewer System (MS4). The MS4 serves most of the District's land area and – in contrast to the CSS – conveys stormwater directly to the District's streams and rivers, rather than the wastewater treatment plant.

When regulated projects purchase SRCs generated from newly-constructed, voluntary (i.e., not built to satisfy a regulatory requirement) GI built in the MS4, this shifts investment in GI to where it is needed most. Specifically, investment is shifted to areas where stormwater drains directly to District's waterbodies without treatment, maximizing GI's water quality benefits. DOEE refers to SRCs generated from new, voluntary GI in the MS4 as "High-Impact" SRCs. When regulated projects use High-Impact SRCs, this will help to accelerate DOEE's restoration of the District's waterbodies while also providing compliance flexibility.

This report summarizes SRC and Offv program activity in FY20 and FY21. Additional details are provided in the subsequent sections of this report in charts and tables. For complete information about the SRC Program, SRC Price Lock Program, and to view the SRC Registry, please visit doee.dc.gov/src.

2020 Regulatory Amendments

On January 31, 2020, DOEE finalized amendments to the District's stormwater management regulations. Among other amendments, DOEE proposed three key changes to the SRC program, described below. The changes increase compliance flexibility and encourage developers to use High-Impact SRCs.

DOEE reviewed public comments and finalized the regulatory amendments in January 2020. For a more detailed explanation of the regulatory amendments, please visit doee.dc.gov/proposedstormwaterrule.

Additional Off-site Compliance Flexibility

One of DOEE's primary goals in implementing the SRC trading program is to increase the amount of GI located in areas that drain to the MS4. To help incentivize more GI in the MS4, DOEE's 2020 amendments to the regulations waived the 50 percent (50%) on-site retention requirement for projects in the CSS draining to the underground storage tunnels. To use the new flexibility, projects must commit to achieving off-site retention in the MS4 (using SRCs from the MS4 or paying ILF).

Requirements to Use MS4 SRCs

When the SRC trading program was established, DOEE did not include any trading barriers or trading ratios, except for Anacostia Watershed Development Zone (AWDZ) sites. DOEE's 2020 amendments introduced requirements that AWDZ projects and any project in the MS4 must achieve off-site retention in the MS4 (by using SRCs from the MS4 or paying ILF). The regulations allow for some exceptions for owners of projects in the MS4 who have already purchased or self-generated SRCs from the Combined Sewer System (CSS).

In designing the SRC program, DOEE anticipated that the market would result in projects located in the CSS complying with Offv by using SRCs generated in the MS4. This scenario maximizes water quality outcomes in the District by increasing the total retention capacity built in the MS4. To date, most SRCs used to meet Offv requirements were generated in the MS4; however, DOEE has also observed projects in the MS4 using SRCs generated in the CSS. Initially, DOEE did not restrict projects in the MS4 from using SRCs generated in the CSS. The regulatory amendments now require sites in the MS4 to purchase SRCs from the MS4.

SRC Eligibility Cutoff Date

Before the 2020 amendments, the District's stormwater management regulations allowed any project installed after May 1, 2009, to generate SRCs -- assuming other eligibility criteria are met. Now, only projects installed after July 1, 2013, the effective date of the retention based Stormwater requirements, are eligible to generate SRCs. The amendment, a change required by the District's MS4 permit, also ends SRC eligibility for projects if the first application for SRC certification is not submitted within three years of project completion. DOEE expects that without also implementing the 3-year application window following project completion, future MS4 permits would require regular changes to this cutoff date.

After the final rulemaking, DOEE waived the amended eligibility requirements for the first six months. As long as a project starts generating SRCs within three years of the project completion and does not lapse in SRC certification for more than six months, the project will be able to continue generating SRCs. DOEE expects that these cutoff dates provide ample time for projects that wish to generate SRCs to submit the necessary application.

This change will encourage investment in voluntary GI in the District because it increases the likelihood that voluntary SRCs will be sold on the market. The ability to sell High-Impact SRCs is critical for the financial viability of voluntary GI projects, which do more to help protect and restore the District's waterbodies. However, certainty about selling SRCs is undermined by the potential for existing GI projects with sunk costs to sell SRCs at below-market prices. Projects with existing GI include many projects vested under the District's pre-2013 regulations or projects that exceeded the requirements of the District's current stormwater management regulations. These SRCs can be brought onto the market at relatively low sale prices since the design, permitting, and construction have been completed. While many existing GI projects have not elected to certify SRCs, the potential market supply of low-impact SRCs has disincentivized new, voluntary SRC-generating GI. DOEE expects this change will incentivize the creation of SRC-generating businesses, which will help to ensure a stable, long-term supply of SRCs for use by regulated projects.

DOEE allowed existing GI practices to generate SRCs under the original 2013 regulations because of the uncertain timeline of a sufficient High-Impact SRC supply, quickly enabling off-site compliance by regulated development and building confidence in the availability of a stable supply of low-cost SRCs. Since the SRC Trading program's creation, there have been 154 SRC trades, with the number of SRCs for sale increasing over time. There has never been an instance where there were insufficient SRCs to meet the current Offv demand. There is now a robust marketplace, and the construction of new, voluntary GI projects in the MS4 is currently occurring at a large enough scale to meet the total demand for SRCs from regulated developers, reducing market reliance on SRCs from existing GI.

SRC Market Activity Summary

All statistics mentioned in this section are shown in Table 1.

The SRC market and Offv programs grew substantially in FY20 and FY21. Forty-four trades occurred in both FY20 and FY21, for a total of 617,879 SRCs at an average price of \$1.74 in FY20 and 302,869 SRCs at an average price of \$1.63 in FY21. The total number of SRCs sold in FY20 was the highest of any prior fiscal year. DOEE received one ILF payment in FY20, totaling \$10,017.75. DOEE received no ILF payments in FY21.

In FY20, DOEE approved 18 applications to certify SRCs, accounting for 441,503 SRCs, of which 293,905 represent new supply in the SRC market (including SRC Price Lock Program participants). The other 147,598 were generated by SRC owners who chose not to list their SRCs for sale (e.g., the SRCs are being banked to meet the SRC owners' Offv obligations on future projects if they arise).

FY21 saw the highest number of SRCs certified of any prior fiscal year, with 24 approved applications certifying 1,966,383 SRCs. Of those, 1,716,375 represent new supply in the SRC market (including SRC Price Lock Program participants), and 250,008 were banked and were not listed for sale on the market.

The number of SRCs approved is reported by sewershed and watershed. A watershed has all runoff and precipitation draining to a single point, while a sewershed area has all sewers draining to a single point. Of the SRCs approved in FY20, 81 percent are from GI located in the Anacostia River watershed, 16 percent are from the Potomac River watershed, and 3 percent are from the Rock Creek watershed. Of the SRCs approved in FY21, 27 percent are from the Anacostia River watershed, 57 percent are from the Potomac River watershed, and 15 percent are from the Rock Creek watershed.

Of the SRCs certified in FY20, 53 percent are from GI located in the MS4, and 47 percent are from the CSS. In FY21, 95 percent of SRCs certified are in the MS4, and 5 percent are from the CSS. This indicates that DOEE's efforts to incentivize GI in the MS4 are working.

Table 1: SRC Market Activity by the Numbers

SRC Market Activity by the Numbers		
	FY 20	FY 21
SRC Trading		
Transactions	44	44
SRCs Traded	617,879	302,869
Average SRC price	\$1.74	\$1.63
In Lieu Fee		
Number of Payments	1	None
Total Value	\$10,017.75	\$0
SRC Certifications		
SRC Certification Applications	18	24
SRCs for Sale	293,905	1,716,375
SRCs Banked	147,598	250,008
Total SRCs Generated	441,503	1,966,383
SRC Distribution by Watershed		
Anacostia Watershed	81%	27%
Potomac Watershed	16%	57%
Rock Creek Watershed	3%	15%
SRC Certification Distribution by Sewershed		
MS4 Sewershed	53%	95%
CSS Sewershed	47%	5%

SRC Supply

A total of 440,725 SRCs were certified in FY20, and a total of 1,966,383 SRCs were certified in FY21. DOEE certifies SRCs for up to 3 years at a time on one application. Each fiscal year shown in Figure 1 includes any SRCs certified in that year, including SRCs certified for future fiscal years. Fiscal years 14 and 15 were omitted from Figure 1 to conserve space. These values can be found in previous SRC reports.

Some SRC owners generate SRCs to bank for Offv compliance for potential future regulated projects. **Figure 1** and **Table 2** show how many of the SRCs certified each year represent supply in the SRC market versus SRCs that were not listed for sale on the market because they were privately banked for other reasons, such as satisfying the SRC generator's Offv requirement at another site. This categorization is based on the applicant's decision whether to list SRCs for sale.

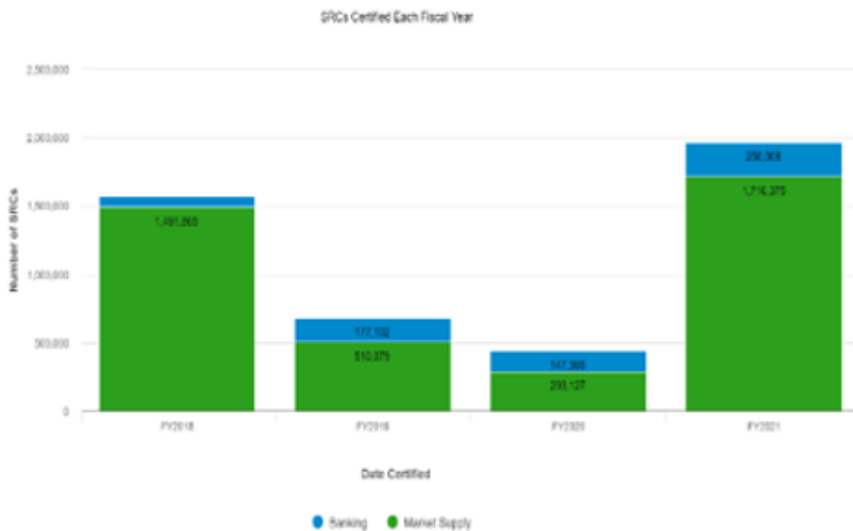


Figure 1: SRCs Certified Per Fiscal Year

Table 2: SRCs Certified Each Fiscal Year

Fiscal Year	SRCs approved – Market Supply	SRCs Approved – Banking	Total
FY14	51,249	0	51,249
FY15	71,588	123,000	194,588
FY16	125,917	152,955	278,872
FY17	96,020	1,801,857	1,897,877
FY18	1,491,865	79,762	1,571,627
FY19	512,750	177,102	689,852
FY20	293,127	147,598	440,725
FY21	1,716,375	250,008	1,966,383
Total	4,358,891	2,732,282	7,091,173

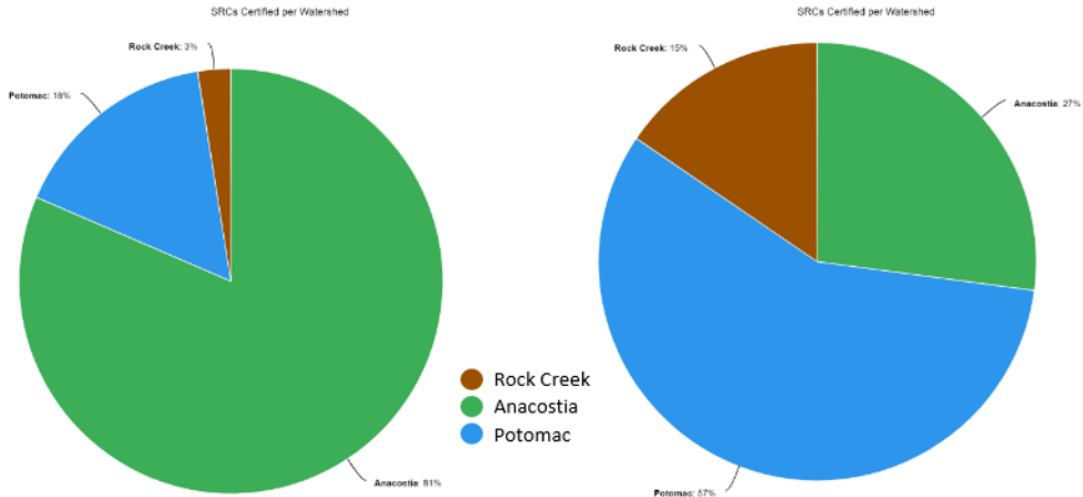


Figure 2 shows the number of SRCs certified by DOEE in FY20 versus in FY21 by watershed. In FY20, 81 percent of SRCs were certified in the Anacostia watershed, 16 percent were certified in the Potomac watershed, and 3 percent were certified in the Rock Creek watershed. In FY21, 27 percent of SRCs were certified in the Anacostia watershed, 57 percent were certified in the Potomac watershed, and 15 percent were certified in the Rock Creek watershed.

FY 20 SRCs Certified Per Watershed

FY 21 SRCs Certified Per Watershed

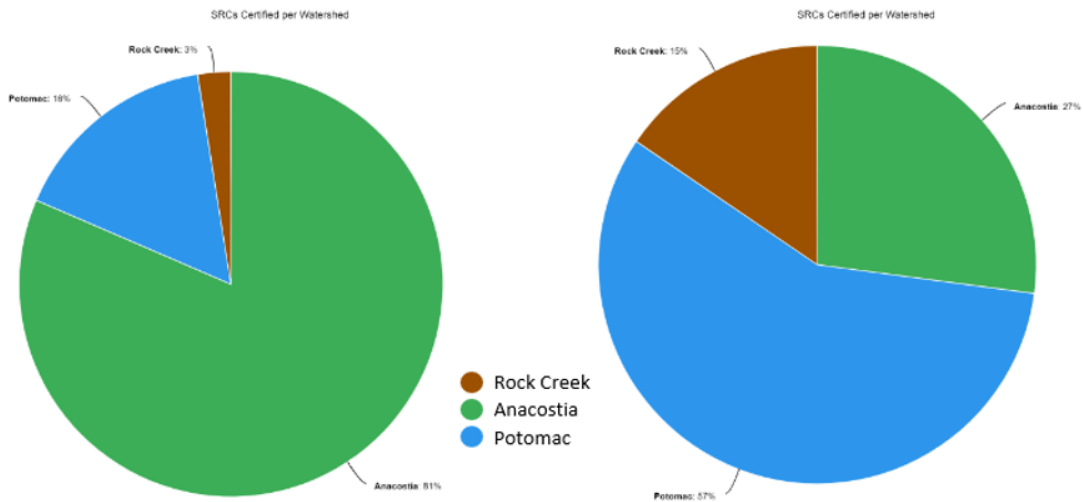


Figure 2: SRCs Certified Per Watershed in FY20 vs FY21

Figure 3 shows the number of SRCs certified by DOEE in FY20 vs FY21 by sewershed. Fifty three percent of SRCs were certified in the MS4 and 47 percent of SRCs were certified in the CSS FY20, while in FY21 95 percent of SRCs were certified in the MS4 and 5 percent of SRCs were certified in the CSS. This is a substantial change in the right direction. This shows a shift in new, voluntary GI in the MS4, which is the sewershed in the District that needs the GI the

most. The 2020 Amendment was the driving force behind this change, as it requires certain project locations to use MS4 SRCs rather than any SRC.

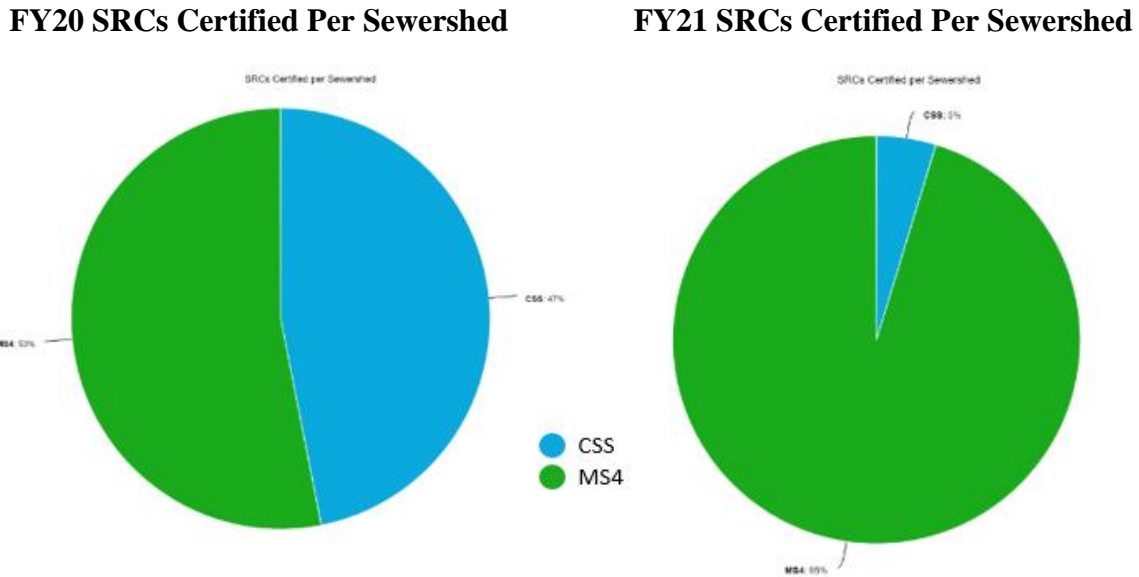


Figure 3: SRCs Certified Per Sewershed in FY20 vs FY21

Since the SRC certification period may last for up to 3 years, each SRC also has a retention year,¹ which corresponds to the year during which the GI that generated the SRC is actually retaining stormwater. For example, if a GI project with 100 gallons of SRC eligibility is certified for 3 years in FY21, all 300 credits would be approved in FY21. However, 100 credits are from the retention of stormwater in FY21, 100 are from the retention of stormwater in FY22, and 100 are from the retention of stormwater in FY23. For clarity, DOEE refers to this concept as the retention year. By contrast, the SRC certification date is the date when a complete and approvable certification application was submitted to DOEE. The first retention year for a set of SRCs starts on the SRC certification date. The second and third retention years covered by the application begin on the anniversaries of the SRC certification date.

More information about SRC certification is available in **Appendix Table C**, including the certification date and retention year for each SRC. Each application may result in SRC certification for up to 3 years, which is shown in the Retention Year columns. In most instances, the retention year occurs partially in two fiscal years. For simplicity, this table reports the fiscal year during which the SRC begins to achieve retention. For example, an SRC with a retention year from 8/22/2020 through 8/21/2021 would achieve retention during both FY20 and FY21 but would be reported only in the FY20 column.

¹ In prior reports, DOEE has referred to this concept as the “vintage year.” DOEE is switching to the term “retention year” to clarify the meaning. DOEE welcomes feedback on other terms that may provide further clarification.

Due to space limitations, **Appendix Table C** includes information about all SRCs certified with an application submitted in FY20 and FY21. Prior annual reports² include information about the retention year of SRCs approved by DOEE on applications submitted prior to FY19.

SRC Demand

As DOEE continues to review and approve projects under the District's stormwater management regulations, DOEE expects annual variation in the number of projects and volume of Offv approved per fiscal year. However, DOEE notes that the cumulative Offv in effect continues to grow annually.

DOEE's 2020 amendments introduced the need to differentiate between two parts of the CSS: the portions draining to the storage tunnels that will handle sewer overflows, and the portion that does not. Projects in the portion of the CSS that drains to the storage tunnels have the option to meet up to 100 percent of the retention requirement off-site if they purchase SRCs from the MS4.

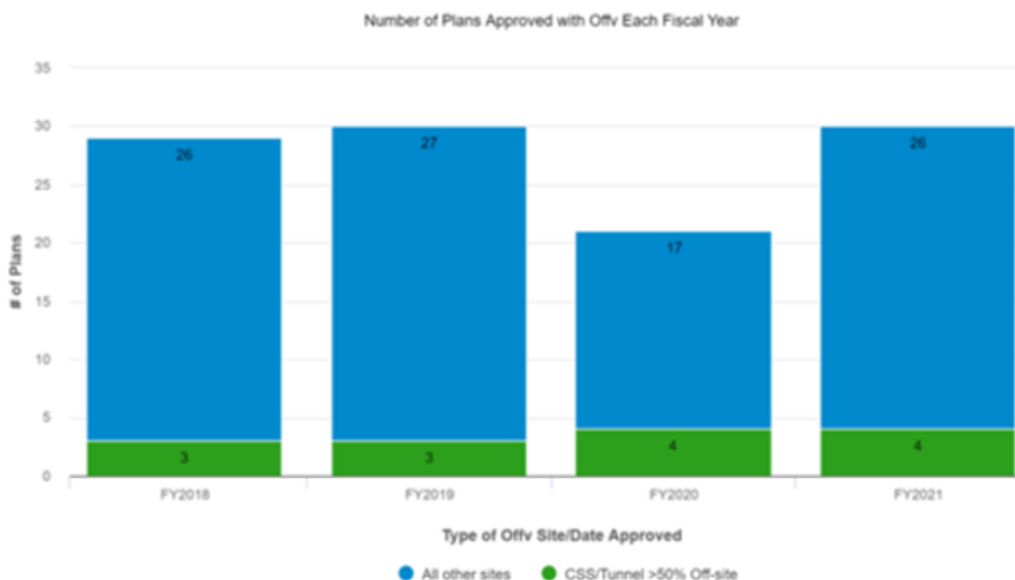


Figure 4 shows the number of plans approved with Offv for each fiscal year. If applicable, values for prior fiscal years have been updated to reflect design changes that occurred in after initial approval in prior fiscal years. The number of projects approved with Offv decreased by 22.2 percent in FY20 relative to the number of projects approved with Offv in FY19, but then increased by 42.8 percent in FY21.

² Prior annual reports can be found in the MS4 annual reports at doee.dc.gov/node/139492 or on the SRC website at doee.dc.gov/src.

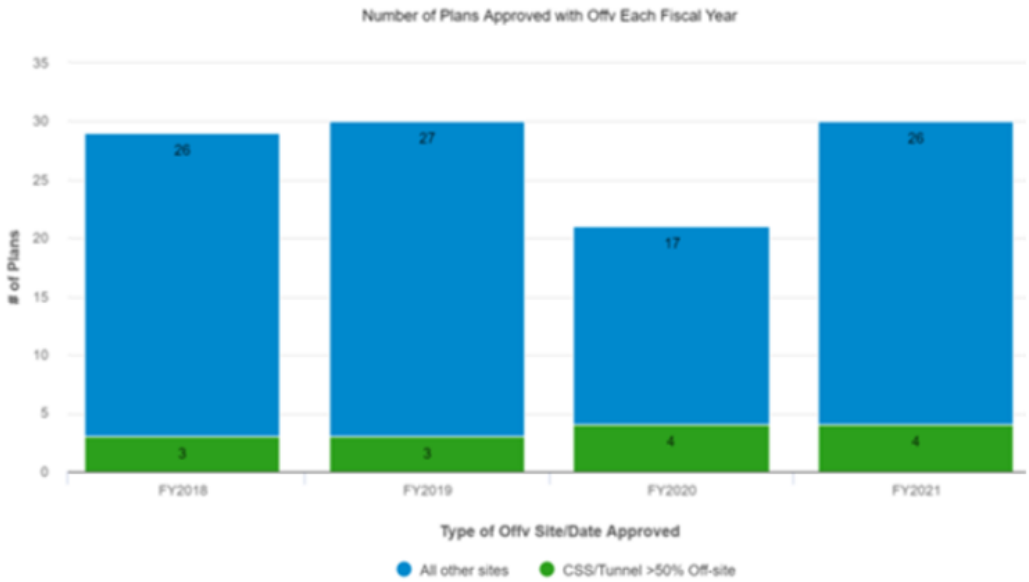


Figure 4: Number of Plans Approved With Offv Per Fiscal Year

Figure 5 shows the number of gallons of Offv approved per fiscal year. DOEE approved plans with 270,659 gallons of Offv in FY20, and 164,494 gallons in FY21. The number of gallons of Offv on plans approved in FY20 increased by 17.4 percent relative to the number of gallons on plans approved in FY19, and then decreased by 39.2 percent from FY20 to FY21. Because Offv for past years remains in effect as new projects take on Offv in the current year, cumulative Offv steadily grows from year to year. As more projects are approved with Offv, the demand in the SRC market increases, unless the regulated sites plan to comply with self-generated SRCs or ILF payment. This creates additional incentive for more voluntary GI projects to meet that demand.

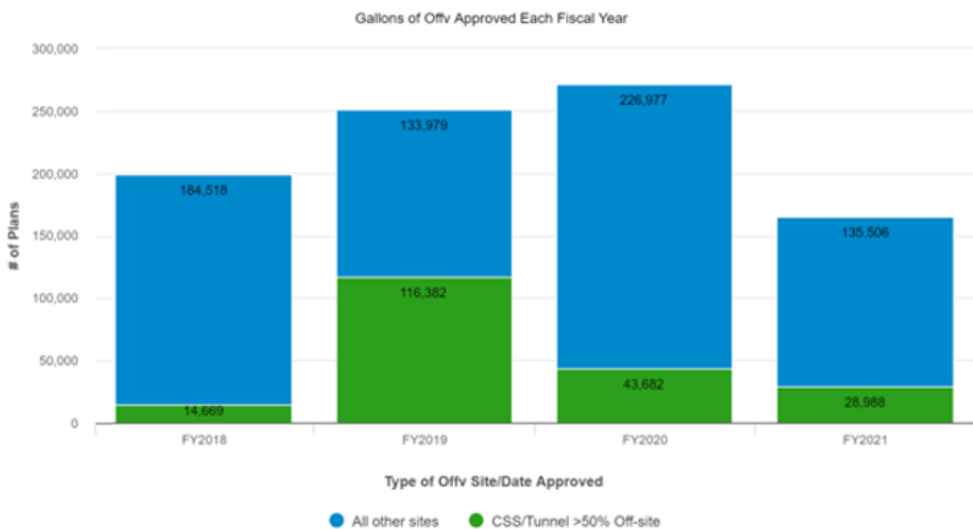


Figure 5: Gallons of Offv Approved Per Fiscal Year

Figure 6 shows the number of plans built with Offv each fiscal year. The number of individual projects with Offv built decreased by 12.5 percent from FY19 to FY20 but increased by 35.7 percent in FY21 relative to FY20. Figure 7 shows the number of gallons of Offv on plans built (Figure 5 shows gallons of Offv approved) in each fiscal year. The number of gallons of Offv on projects built in FY20 decreased by 57.5 percent relative to FY19 but increased by 68.3 percent from FY20 to FY21. The decrease between FY20 and FY21 is likely a result of the COVID-19 pandemic, as many projects were put on hold or postponed completion. This was a decrease in the rate of growth, but not a decrease in overall SRC demand.

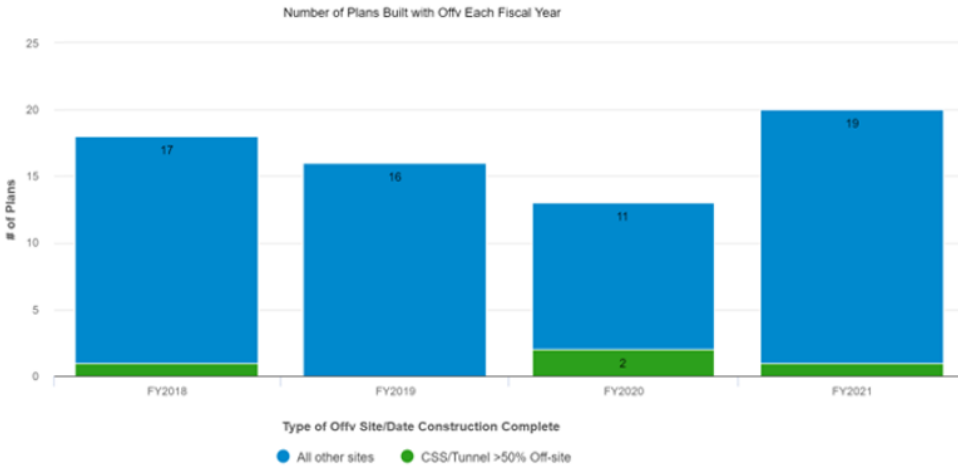


Figure 6: Number of Plans Built With Offv Per Year

Figure 7 shows a large decrease of 57.5 percent in gallons of Offv built from FY19 to FY20. Again, this is likely due to the COVID-19 pandemic. The gallons of built Offv began rising from FY20 to FY21 and increased by 70 percent.

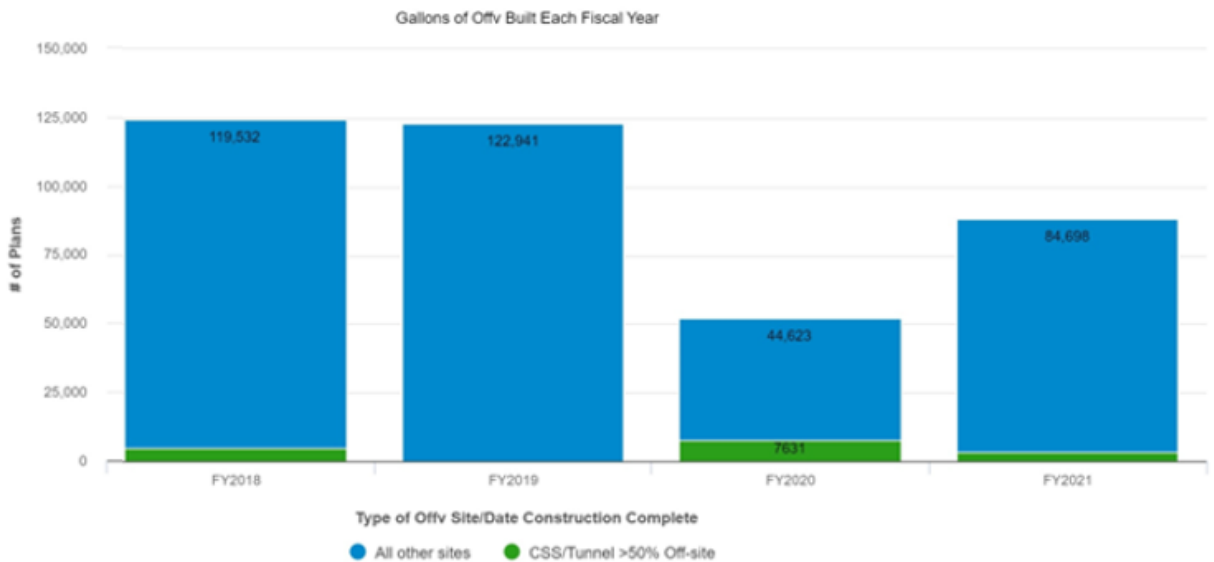


Figure 7: Gallons of Offv on Built Projects per Year

As shown in **Figure 8**, the cumulative Offv built increased in FY20 by 10.3 percent to 367,885 and increased by 29.3 percent to 475,707 in FY21. Because Offv is an annual requirement, total Offv is cumulative and the overall demand for SRCs increased.

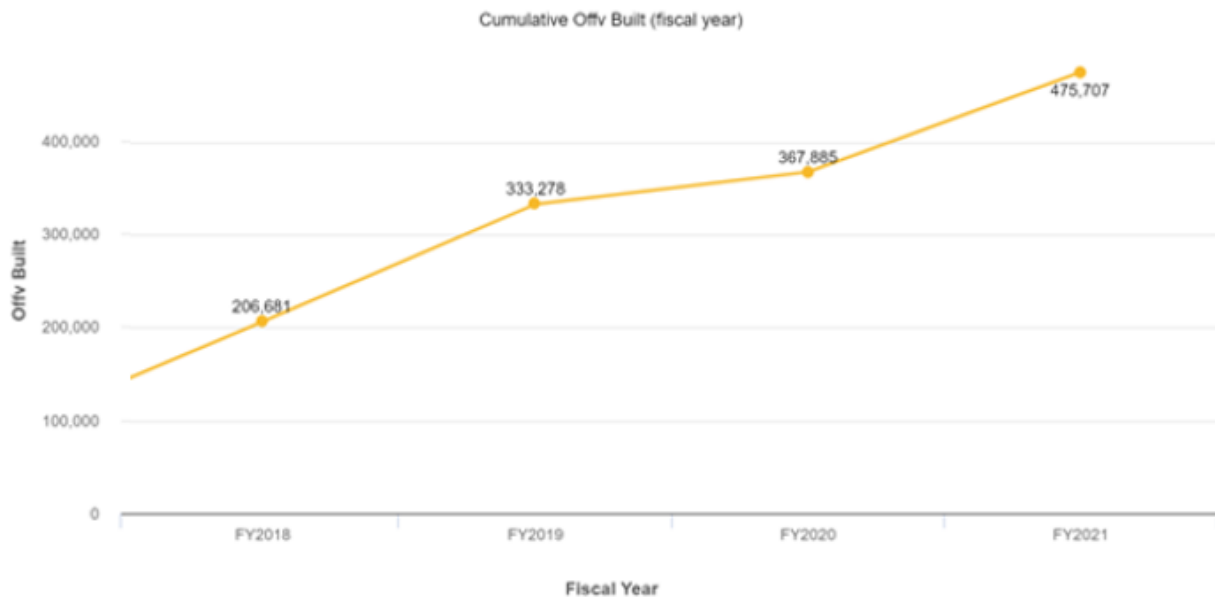


Figure 8: Cumulative Gallons of Offv on Built Projects

SRC Trades

Eighty-eight SRC trades occurred in FY20 and FY21, 44 in both FY20 and FY21. This was an increase from 27 SRC trades in FY19. All trades were driven by projects that were nearing the end of construction or their next Offv compliance date. This does not include SRCs purchased by DOEE through the SRC Price Lock Program. **Appendix Table D** lists the prices for each trade and an average for all trades.

In FY20, DOEE began classifying certain SRCs as "High-Impact SRCs," which refer to SRCs generated from new, voluntary GI built in the MS4. As their name implies, these SRCs have the highest water quality and environmental impact. Of the 920,748 SRCs that were traded in FY20 and FY21, 36.8 percent of them were High-Impact SRCs (Appendix Table D).

Further analysis can be provided when grouping SRC trades into groups based on the number of SRCs included in the trade. Prior annual reports include information about the average price of SRCs traded since the program inception, grouped by size of trade. **Table 3** shows the number of trades per tier and includes how many SRCs were High-Impact SRCs, the average price per trade, average buyer price per SRC, and average DOEE price per SRC.

Table 3: Average Price of SRCs Traded in FY20 and FY21, Grouped by Size of Trade

Number of SRCs Traded	Number of Trades	Average SRCs per Trade	% High-Impact SRCs	Average Price of Trade	Average Buyer Price/SRC	Average DOEE Price/SRC
Under 1,000	17	564	40%	\$985.80	\$1.66	\$0
1,000 – 9,999	53	3,420	25%	\$6,131.22	\$1.70	\$0.08
10,000 – 19,999	10	14,063	43%	\$23,546.40	\$1.64	\$0.05
20,000 +	8	73,658	39%	\$132,078.56	\$1.66	\$0.21

Project Off-Site Volume Compliance

A regulated site must begin to comply with its Offv as of the date of its Final Construction Inspection and every year thereafter. Projects with Offv must use SRCs and/or pay ILF for each year of Offv compliance. **Appendix Table E** shows periods of Offv compliance that began in FY20, regardless of when ILF payment was received or when SRCs were certified and traded (e.g., for a multi-year compliance period or for a trade that occurred in one fiscal year for a compliance period that began in another).

From program inception through the end of FY21, 159 projects that received SWMP approval from DOEE opted to comply with the requirement in part through Offv (approximately 14 percent of projects that have triggered the District's stormwater management regulations). As of the end of FY21, 88 of those projects had finished construction and begun complying with the Offv.

Table 4 provides a summary of additional information about how projects have complied with their Offv for the most recent year. DOEE has observed that ILF payment is made in very limited circumstances. Typically, ILF payment occurs when a project has a relatively small Offv or if the organization has funding restrictions to purchase SRCs. At the end of FY21, no projects were paying the ILF to meet their Offv, which is the preferred amount. Self-generated SRCs are generated from GI at one project and used for Offv compliance for another project owned by the same entity.

Table 4: Type of Compliance Used for the Most Recent Year of Offv Compliance (All Projects Built Through the End of FY21)

Option Used for Offv	Number of Projects	Percent of Projects	Offv from Approved Plan (gallons)	Percent of Offv from Approved Plan
Purchased SRCs	61	69.3%	309,930	63.5%
Self-generated SRCs	27	30.7%	178,056	36.5%

DOEE has found that many SRC sellers prefer larger transactions, which may include multiple years of Offv compliance. DOEE expects that the new subsidy program will help incentivize buyers to purchase eligible SRCs in bulk for multiple years at once. DOEE is also aware of several instances in which buyers and sellers have discussed or agreed to an initial sale that includes an option for future SRC sales. Buyers can purchase enough SRCs to meet many years of Offv compliance at a time, which may help to reduce administrative processing of applications. However, DOEE has observed that buyers typically purchase in 1-year increments. Seventy-five percent of the projects in FY20 and FY21 with an Offv purchased SRCs for one year at a time. The tables below summarize the number of years of Offv compliance achieved on applications to use SRCs that were submitted during FY20 and FY21 as well as the amount of time between the SRC sale and the start of the Offv compliance period (Table 5 and Table 6).

Table 5: Length of Offv Compliance Period Achieved in FY20 Using Purchased SRCs

Number of Years of Compliance Achieved	Number of Sites	Offv (Annual)	Number of SRCs Used
1	32	234,869	235,978
2	3	44,412	88,824
3	7	12,705	38,115
4	0	0	0
5	3	6,512	34,530
10	3	4,584	45,840

Table 6: Length of Offv Compliance Period Achieved in FY21 Using Purchased SRCs

Number of Years of Compliance Achieved	Number of Sites	Offv (Annual)	Number of SRCs Used
1	47	308,404	313,044
2	6	68,453	139,694
3	6	32,728	98,184
4	2	4,680	18,720
5	0	0	0
10	1	1,755	17,550

DOEE has observed that SRC buyers do not typically purchase their SRCs more than a few months in advance of their required compliance date. Eighty-one percent of individual purchases occur within 40 days of the required compliance date. Eleven percent of individual purchases happened over 100 days from the required compliance date.

If the buyer purchases enough SRCs for a multi-year compliance period, **Table 7** identifies the length of time between the purchase and the start of the first year of the compliance period. For example, if a project has an Offv of 100 gallons and the owner purchases 300 SRCs to comply for 3 years, and the purchase occurs 30 days before the start of the compliance period, all 300 SRCs are counted as being purchased 21 to 30 days before the compliance period.

Table 7: Time Between SRC Purchase and Offv Compliance Period for Periods Beginning in FY20 and FY21

Time Period Between SRC Sale and Start of Offv Compliance Period	Number of SRCs	Percent of SRCs	Number of Transactions
10 days or fewer	127,204	26.5	16
11 to 20 days	37,781	7.9	9
21 to 30 days	139,647	29.1	12
31 to 40 days	85,154	17.7	13
41 to 50 days	5,692	1.2	4
51 to 60 days	11,912	2.5	6
61 to 70 days	2,562	0.5	5
71 to 80 days	6,240	1.3	3
81 to 90 days	0	0	0
91 to 100 days	9,056	1.9	4
Over 100 days	55,224	11.5	17

SRCs Used in FY 2020 and FY 2021 – Spatial Distribution

An SRC certified in one location in the District can be used to comply with an Offv requirement in another sewershed or watershed. Figure 9 shows that an average of 69 percent of the SRCs that were used in FY20-21 were generated by GI practices located in the MS4 and were used to comply with Offv requirements in the MS4, almost double from FY19. Twenty percent of the SRCs used in FY20-21 were generated in the MS4 and used in the CSS. These two scenarios are the most preferred and give the most environmental benefit. Combined, 89 percent of the SRCs in FY20-21 came from the MS4, up from 56 percent in FY19. Seven percent were both generated and used in the CSS, and 4 percent were generated in the CSS and used in the MS4, down from 15 percent and 29 percent respectively.

The 4 percent of SRCs generated in the CSS and used in the MS4 were likely certified prior to the transition period after the amendment to the Stormwater Rule was approved on January 30, 2020. This rule restricts MS4 sites to use MS4 SRCs only, with limited exceptions.

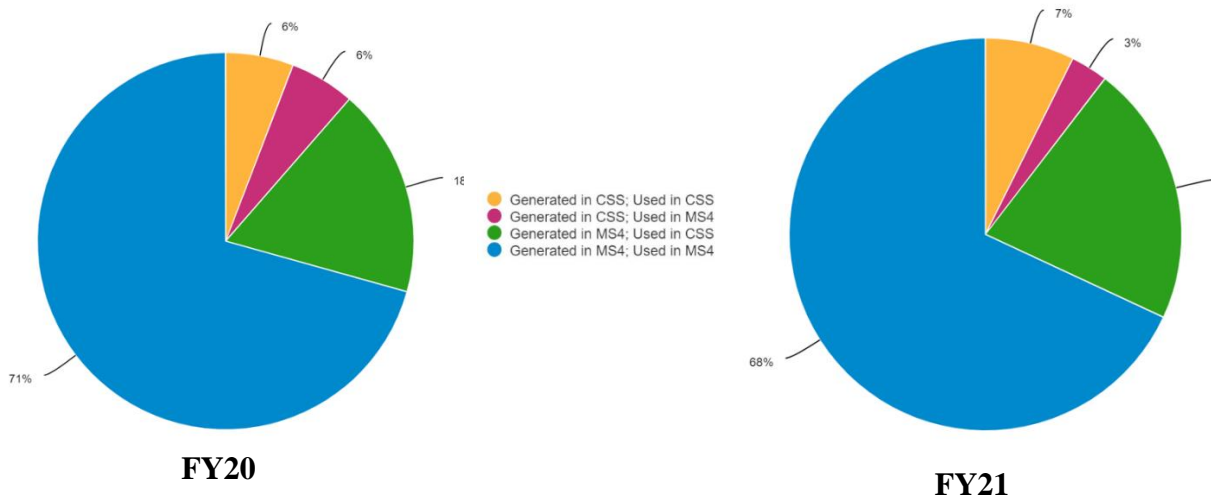


Figure 9: Locations where SRCs were generated and used in FY20 and FY21

Appendix Table F shows the total number of years of Offv that were met in FY20 and FY21, along with the number of SRCs used, the sewershed where the SRCs were generated, and the sewershed where the SRCs were used.

SRCs Used in FY 2020 – FY 2021 – Temporal Distribution

All statistics mentioned in the section are shown in Figure 10.

DOEE certifies up to 3 years' worth of SRCs at a time and SRCs may be banked indefinitely. As discussed above, DOEE tracks the SRC certification year, which represents the year during which the GI practice achieves retention. The first certification year for an SRC generating project starts on the date a complete, approvable SRC certification application is submitted. The

second and third certification years covered by the application begin on the anniversaries of the date DOEE received the complete application.

Offv compliance is also tracked on an annual basis, which DOEE refers to as the SRC usage year. A regulated site with an Offv must begin to comply with its Offv as of the date of its Final Construction Inspection. Twenty-eight percent of SRCs used in FY20 and 24 percent of SRCs used in FY21 were generated one year prior to use. In both FY20 and FY21, 13 percent of SRCs were generated two years before use. Three percent of SRCs used in FY20 and 13 percent of SRCs used in FY21 were generated 3 years before use. Zero percent of SRCs used in FY20 and 1 percent of SRCs used in FY21 were generated 5 years before use. Fifty-three percent of SRCs used in FY20 and 31 percent of SRCs used in FY21 were generated and used contemporaneously, meaning that the SRC usage year began within 1 year of the start of the SRC retention year.

In limited circumstances, an SRC can have a usage year prior to its retention year. For example, a regulated site with an Offv of 15,000 gallons can buy 15,000 SRCs from a site with a bioretention with 5,000 gallons of eligible retention capacity, meaning that it generates 15,000 SRCs every 3 years. In this case, the regulated site would use all 3 years of SRCs to meet one year of Offv. Two percent of SRCs used in FY20 and 19 percent of SRCs used in FY21 had a usage year that concluded within 1 year prior to the start of the SRC retention year. The ability for this to occur is limited by the maximum 3-year period of SRC certification, and SRCs can only be certified for the entire 3-year time period if a maintenance contract or plan is also provided to cover for the entire 3 years.

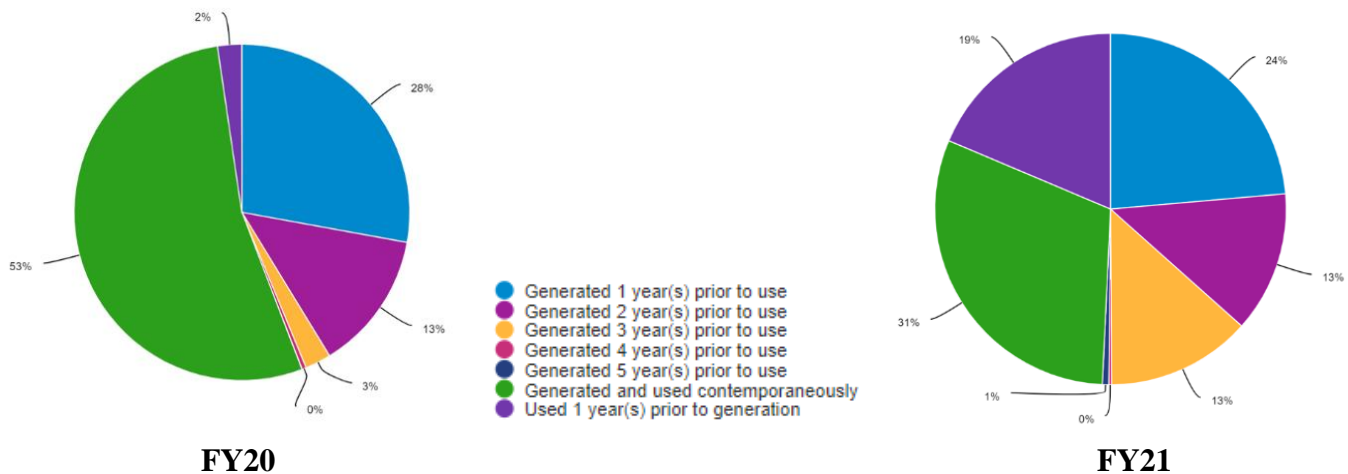


Figure 10: Summary of Temporal Distribution of SRCs Used in FY20 and FY21

SRC Price Lock Program

The SRC Price Lock Program gives its participants, or SRC Aggregators, the option to sell SRCs to DOEE for a set price, in addition to the opportunity to sell SRCs on the market. The option to sell to DOEE offers certainty to SRC Aggregators about the revenue from an SRC-generating project. To qualify for the SRC Price Lock Program, applicants must submit their proposed SRC-generating projects for pre-approval before construction.

Due to the Covid-19 public health emergency and District government spending freeze, the SRC Price Lock Program paused review and approval of any new applications from Spring 2020 until fall 2021. Starting Fall 2021, DOEE instituted biannual, 60-day open application windows for funding opportunities in the spring and fall. Applications will be accepted on a rolling basis, but DOEE expects most applications to be submitted during these biannual windows.

Subsidy Program

DOEE realizes the best environmental outcomes through the SRC Trading program when credits from SRC Price Lock participants are sold on the market. However, SRC Aggregators need to ensure a viable return on investment (ROI) for their projects and often cannot list their SRCs at competitive prices compared to the sellers of SRCs generated in excess of a regulatory requirement. To help facilitate market sales of credits from SRC Price Lock projects, while still getting SRC Aggregators their ROI, DOEE implemented a new subsidy program in 2020.

When subsidy-eligible SRCs are sold, DOEE pays a portion of the sale price. This increases the quantity of SRC Price Lock credits that are likely to be sold on the market and helps reduce costs for buyers while generating revenue for SRC Aggregators. The portion of the sale price that DOEE pays mostly ranges from \$0.20 to \$0.70 which is substantially less than the cost for DOEE to directly purchase SRCs from an SRC Aggregator (Table A). This balances DOEE's desire to support buyers and SRC Aggregators while ensuring that funding reserved for SRCs will become re-available for future participants. The price for buyers also decreases (i.e., the DOEE subsidy increases) for every 5,000 SRCs purchased at once, which DOEE expects will incentivize more buyers to purchase multiple years' worth of SRCs at once.

Applicants to the SRC Price Lock Program now have the option to just sign a subsidy agreement rather than sign a full purchase agreement. This, like a purchase agreement, helps incentivize and fund new, voluntary GI in the MS4 but requires less funding to be reserved up front. This allows DOEE to approve more Price Lock program participants.

From the start of the SRC Price Lock program in FY17 through the end of FY21, 10 projects have signed purchase agreements, and 1 has signed a subsidy-only agreement. When completed, their GI will manage runoff from a combined retrofit area of almost 29 acres in the MS4 (Table B).

Due to the public health emergency and spending freeze, only one Purchase Agreement was signed in FY20 and FY21. Of the \$11.5 million DOEE committed to the SRC Price Lock Program, the projects enrolled through FY21 account for \$5.06 million of funding. This \$5.06

million is the amount required to purchase 4,170,936 SRCs over 12 years of credit certification, assuming none of the projects sell any of their SRCs on the market. DOEE has spent \$643,258.85 to fully purchase 336,575 SRCs and has spent \$116,907.67 to pay for a portion of 240,574 SRCs that were sold on the market through the Subsidy Program. If not sold on the market, these subsidized 240,574 SRCs would have used \$473,999.96 of DOEE's SRC Price Lock Program funds. which can now be used for other SRC Price Lock Program projects in the future.

The status of the escrow account, which contains the Price Lock Program funds, can be found in Table 8. DOEE purchased SRCs from one SRC Price Lock Program project in FY19, spending a total of \$512,163.6 to purchase 262,648 SRCs that the project generated from its first 3-year SRC certification cycle. Price Lock Program SRCs purchased and retired by DOEE can be found in Table 9.

When DOEE approves a 3-year SRC certification cycle for a project in the SRC Price Lock Program, the participant must wait 18 months before having the option to sell SRCs to DOEE. For the ten projects enrolled in the program, DOEE still had \$5.07 million reserved in the escrow account as of the end of FY21. This is the maximum amount required if DOEE were to purchase all the participants' SRCs through all 12 years of program participation. For the first six years, SRC purchase prices are \$2.03 and \$1.77 for non-tidal and non-tidal MS4 locations, respectively. SRC purchase prices are \$0.42/SRC for years 7 through 12 for both non-tidal and tidal MS4 areas, so less funding is required to purchase credits during those years.

Table 8: FY20-FY21 Escrow Account Status

Project Number	FY Enrolled	Original Amount Reserved	SRC Price Lock Program Funding Unreserved Due to Market Sale³	Total Amount Paid as of FY21	Amount Still Reserved at the End of FY21
1	FY18	\$157,426.50	\$65,315.25	\$0	\$92,111.25
2	FY18	\$1,332,532.38	\$232,979.94	\$586,807.28	\$512,745.16
3	FY18	\$132,906.60	\$0	\$55,142	\$77,764.50
4	FY19	\$587,250.30	\$0	\$0	\$587,250.30
5	FY19	\$997,270.70	\$260,939.32	\$143,929.97	\$592,401.41
6	FY19	\$241,999.38	\$84,024.34	\$13,769.94	\$144,205.10
7	FY19	\$290,574.90	\$0	\$0	\$290,574.90
8	FY20	\$1,320,897.90	\$0	\$0	\$1,320,897.90
TOTAL		\$5,062,858.66	\$643,258.85	\$799,649.19	\$3,617,950.52

³ Based on the SRC Price Lock Program price that DOEE would have paid for these credits, as specified in the participant's SRC Purchase Agreement. For the credits these participants sold on the market, DOEE would have paid \$1.95/SRC, based on these credits being for green infrastructure managing runoff from the non-tidal MS4 area and being for the first 6 years of credit certification.

Table 9: SRCs Purchased and Retired by DOEE through FY21

Transfer Date	Watershed Where SRCs Are Generated	Purchase Price per SRC	Number of SRCs	Total Value of Transfer
9/5/2018	Anacostia	\$1.95	28,278	\$55,142.10
1/21/2019	Anacostia	\$1.95	262,648	\$512,163.60
6/12/2020	Anacostia	\$2.03	45,649	\$92,667.47

SRC Site Evaluation Program

The SRC Site Evaluation Program was discontinued due to low participation rates.

SRC Aggregator Startup Grant

DOEE did not approve any grant applications in FY20 or FY21. The total funds awarded by DOEE remains \$745,497. Each SRC Aggregator is focused on designing GI in the MS4 for participation in the SRC Price Lock Program. While each aggregator has proposed their own strategy for developing GI designs, general themes include focusing on religious institutions, partnering with properties that have large impervious surfaces, implementing vegetated GI like rain gardens, and searching for opportunities located in the MS4. DOEE expects to fund up to \$225,000 in new grants in FY22 and FY23.

FY22 Goals

DOEE continues to enhance the SRC program to encourage more GI construction in the MS4. To do this, DOEE is focusing on increasing the demand by regulated developers for SRCs from the MS4 and increasing the number of properties in the MS4 that are partnering with SRC Aggregators on SRC projects. Specific actions that DOEE is pursuing include the following:

- Continuing to find new ways to actively encourage regulated developers, particularly those working in the CSS, to purchase SRCs from the MS4, especially High-Impact SRCs, to meet their stormwater management performance requirements:
 - Implementing the regulatory amendments finalized in January 2020.
 - Engaging a public process for additional regulatory amendments to prioritize the use of High-Impact SRCs by most new regulated development projects that opt to comply partially or entirely off site.
 - Improving developers' awareness of the SRC program earlier in the planning process, including through efforts to identify project decision-makers and provide them with information about the SRC program while design choices are still ongoing.
 - Partnering with other District agencies involved in the permitting process when appropriate to encourage the use of SRCs.
 - Updating program guidance documents to communicate to developers the benefits of offsite compliance and to address perceived risks regarding the use of SRCs.
 - Updating program procedures related to offsite compliance.
- Expanding the resources that help SRC Aggregators partner with property owners to construct GI:
 - Expanding use of the list of property owners who are interested in GI. The list is publicly accessible and can help SRC Aggregators find project partners.
 - Improving communication of the benefits of GI to encourage property owners to partner on SRC projects.
 - Improving guidance on the process to generate SRCs, including the permitting process for GI projects.
 - Continuing to evaluate SRC program incentives to encourage more construction of GI in the MS4.
- Expanding the resources that are available to SRC generators:
 - Improving access to geographic information system (GIS) data and analysis tools.
 - Creating new guidance documents, including clarifying the permitting processes.

More Information

The SRC Program is managed by the Green Infrastructure Incentives and Assessment Branch in DOEE's Regulatory Review Division. Please visit doee.dc.gov/src for more information. Additional questions may be directed to Regan Wilhelm at src.trading@dc.gov or (202) 671-5004.

Appendix

Appendix Table A: Subsidy Spending through FY21

Transfer Date	SRC Price Lock Price	SRC Price Paid by Buyer	SRC Price Paid by DOEE	Number of SRCs Sold	Escrow Funds Unreserved
8/19/2021	\$2.03	\$1.45	\$0.63	71,083	\$99,516.20
8/17/2021	\$2.03	\$1.74	\$0.36	6,182	\$10,354.85
7/22/2021	\$2.03	\$1.79	\$0.32	1,750	\$2,992.50
6/30/2021	\$2.03	\$1.66	\$0.39	1,052	\$1,730.54
6/23/2021	\$2.03	\$1.79	\$0.33	6,403	\$10,885.10
6/1/2021	\$2.03	\$1.70	\$0.37	710	\$1,182.15
5/24/2021	\$2.03	\$1.79	\$0.32	223	\$381.33
5/24/2021	\$2.03	\$1.79	\$0.32	1,050	\$1,795.50
2/11/2021	\$2.03	\$1.68	\$0.38	3,077	\$5,092.44
12/4/2020	\$1.77	\$1.77	\$0.20	985	\$1,546.45
11/30/2020	\$1.77	\$1.77	\$0.20	903	\$1,417.71
11/11/2020	\$1.77	\$1.77	\$0.20	2,775	\$4,356.75
10/22/2020	\$1.77	\$1.69	\$0.28	20,357	\$30,331.93
9/11/2020	\$1.77	\$1.75	\$0.22	5,905	\$9,152.75
8/31/2020	\$1.77	\$1.73	\$0.24	10,165	\$15,552.45
7/28/2020	\$1.77	\$1.73	\$0.24	14,161	\$21,666.33
6/11/2020	\$2.03	\$1.80	\$0.32	223	\$382.45
6/4/2020	\$2.03	\$1.55	\$0.59	78,737	\$113,381.28
5/7/2020	\$2.03	\$1.80	\$0.32	1,431	\$2,454.17
4/22/2020	\$2.03	\$1.80	\$0.33	6,500	\$11,082.50
3/4/2020	\$2.03	\$1.80	\$0.32	3,825	\$6,559.88
3/3/2020	\$2.03	\$1.80	\$0.32	3,077	\$5,277.06
Total				240,574	\$357,092.30

Appendix Table B: GI Installed by SRC Price Lock Program Participants

GI Installation Date⁴	GI Group (number of practices installed)	Total Contributing Drainage Area (CDA) (square feet)	Impervious Portion of CDA (square feet)	GI Surface Area (square feet)	SRC-eligible Retention Volume (gal)⁵
12/7/2017	Bioretention (5)	297,733	29,774	16,469	92,153
6/27/2018	Bioretention (1)	12,458	8,258	1,015	9,426
5/8/2019	Bioretention (7)	451,280	43,737	12,859	61,268
	Tree planting and preservation (6)	-	-	-	11,369
	Land cover change (2)	919,119	81,777	12,859	8,194
3/18/2020	Bioretention (3)	38,234	20,971	1,940	17,351
	Tree planting and preservation (4)	-	-	-	1,832
10/30/2020	Tree planting and preservation (2)	-	-	-	374
7/2/2021	Bioretention (1)	22,346	18,958	1,101	19,767
5/28/2021	Bioretention (1)	158,439	65,009	4,470	88,137
	Tree planting and preservation (1)	-	-	-	2,917
9/8/2021	Infiltration (1)	91,516	52,198	2,569	64,866
1/28/2022	Bioretention (1)	50,366	46,791	3,041	37,105
	Infiltration (1)	82	-	36	553
	Impervious surface disconnection (1)	531	-	-	158
TOTAL		1,991,125	320,682	53,282	377,660

⁴ DOEE began accepting applications for the SRC Price Lock Program in FY18 and allowed prior projects to enroll if they were built after September 2016. DOEE no longer allows projects to enroll in the SRC Price Lock Program after construction begins.

⁵ The SRC-eligible retention volume is the retention volume achieved by the GI practice in excess of pre-project retention. This includes an adjustment based on land cover changes. For more information about this calculation, refer to Chapter 7 of the Stormwater Management Guidebook (doee.dc.gov/swguidebook).

Appendix Table C: Retention Year of SRCs Certified in FY20 and FY21

Date SRCs Certified	Watershed	Sewer-shed	Total SRCs (certified in FY20 and 21)	Retention Year			
				FY20	FY21	FY22	FY23
9/29/2021	Anacostia	CSS	31,462	-	31,462	-	-
9/29/2021	Rock Creek	MS4	6,375	6,375	-	-	-
9/16/2021	Anacostia	MS4	16,246	8,123	8,123	-	-
9/16/2021	Rock Creek	MS4	8,018	4,009	4,009	-	-
8/25/2021	Anacostia	MS4	7,494	2,498	2,498	2,498	-
7/29/2021	Anacostia	CSS	420	-	140	140	140
7/21/2021	Anacostia	MS4	20,232	-	10,116	10,116	-
7/19/2021	Potomac	MS4	11,781	-	3,927	3,927	3,927
7/16/2021	Anacostia	MS4	17,308	-	8,654	8,654	-
7/9/2021	Anacostia	CSS	19,599	-	6,533	6,533	6,533
6/24/2021	Rock Creek	MS4	273,162	-	91,054	91,054	91,054
6/4/2021	Anacostia	CSS	12,225	-	4,075	4,075	4,075
5/6/2021	Anacostia	MS4	13,588	-	6,794	6,794	-
5/5/2021	Anacostia	MS4	92,364	-	30,788	30,788	30,788
3/26/2021	Rock Creek	CSS	3,888	-	1,296	1,296	1,296
3/9/2021	Rock Creek	CSS	12,948	-	4,316	4,316	4,316
2/19/2021	Potomac	MS4	110,4912	-	368,304	368,304	368,304
2/2/2021	Anacostia	MS4	27,6459	-	92,153	92,153	92,153
12/18/2020	Potomac	CSS	12,495	-	4,165	4,165	4,165
12/11/2020	Anacostia	MS4	25,407	-	8,469	8,469	8,469
9/8/2020	Rock Creek	CSS	2,334	778	778	778	-
9/2/2020	Potomac	CSS	8,573	8,573	-	-	-
8/31/2020	Anacostia	MS4	792	396	396	-	-
8/10/2020	Potomac	MS4	34,166	17,083	17,083	-	-
7/28/2020	Anacostia	CSS	54,027	18,009	18,009	18,009	-
7/13/2020	Anacostia	MS4	55,251	18,417	18,417	18,417	-
7/13/2020	Rock Creek	MS4	9,576	3,192	3,192	3,192	-
7/8/2020	Potomac	MS4	27,822	9,274	9,274	9,274	-
5/11/2020	Anacostia	CSS	35,388	17,694	17,694	-	-
5/4/2020	Anacostia	MS4	14,991	4,997	4,997	4,997	-
4/29/2020	Anacostia	MS4	672	224	224	224	-
4/7/2020	Anacostia	CSS	9,585	3,195	3,195	3,195	-
3/25/2020	Anacostia	MS4	11,294	5,647	5,647	-	-
3/23/2020	Anacostia	MS4	56,246	39,790	8,228	8,228	-
2/28/2020	Anacostia	MS4	23,214	7,738	7,738	7,738	-
10/31/2019	Anacostia	CSS	19,842	6,614	6,614	6,614	-
10/3/2019	Anacostia	CSS	77,730	25,910	25,910	25,910	-
Total			2,407,886	187,531	840,647	761,990	617,718

Appendix Table D: FY20 and FY21 SRC Trades

Date	Number of SRCs	High-Impact?	Sale Price Paid by Buyer	Sale Price Paid by DOEE	Total Value of SRCs Sold
FY20 (44 trades)					
10/3/2019	1,052	no	\$1.80	N/A	\$1,893.60
10/3/2019	11,013	no	\$1.80	N/A	\$19,823.40
10/4/2019	1,420	no	\$1.80	N/A	\$2,556
10/8/2019	4,950	no	\$1.80	N/A	\$8,910
10/11/2019	60,000	yes	\$2.10	N/A	\$126,000
10/18/2019	2,115	no	\$1.80	N/A	\$3,807
11/8/2019	596	no	\$1.80	N/A	\$1,072.80
12/17/2019	4,539	no	\$1.70	N/A	\$7,716.30
1/9/2020	2,798	no	\$1.80	N/A	\$5,036.40
1/16/2020	1,055	no	\$1.80	\$0	\$1,899
2/13/2020	2,960	no	\$1.80	\$0	\$5,328
2/17/2020	792	no	\$1.80	\$0	\$1,425.60
2/24/2020	1,859	no	\$1.70	\$0	\$3,160.30
3/3/2020	3,077	yes	\$1.80	\$0.32	\$6,507.86
3/4/2020	3,825	yes	\$1.80	\$0.32	\$8,089.88
3/4/2020	26,840	no	\$1.65	\$0	\$44,286
3/12/2020	18,566	yes	\$1.65	\$0	\$30,633.90
3/17/2020	2,878	no	\$1.80	\$0	\$5,180.40
3/20/2020	1,390	no	\$1.65	\$0	\$2,293.50
3/23/2020	1,755	no	\$1.80	\$0	\$3,159
3/24/2020	9,909	no	\$1.65	\$0	\$16,349.85
4/1/2020	228,684	no	\$1.60	\$0	\$365,894.40
4/7/2020	2,142	no	\$1.64	\$0	\$3,512.88
4/9/2020	5,876	no	\$1.62	\$0	\$9,519.12
4/16/2020	12,070	no	\$1.64	\$0	\$19,794.80
4/22/2020	443	no	\$1.64	\$0	\$726.52
4/22/2020	6,500	yes	\$1.80	\$0.33	\$13,812.50
4/27/2020	10	no	\$1.64	\$0	\$16.40
5/7/2020	1,431	yes	\$1.80	\$0.32	\$3,026.57
5/12/2020	438	no	\$1.64	\$0	\$718.32
6/4/2020	78,737	yes	\$1.55	\$0.59	\$168,497.18
6/11/2020	223	yes	\$1.80	\$0.32	\$471.65
7/6/2020	10,770	no	\$1.64	\$0	\$17,662.80
7/14/2020	3,976	no	\$1.76	\$0	\$6,997.76
7/28/2020	14,161	yes	\$1.73	\$0.24	\$27,897.17
7/28/2020	36,050	no	\$1.74	\$0	\$62,727
8/12/2020	3,382	no	\$1.74	\$0	\$5,884.68
8/13/2020	1,863	no	\$1.74	\$0	\$3,241.62
8/31/2020	10,165	yes	\$1.73	\$0.24	\$20,025.05
9/11/2020	1,455	no	\$1.74	\$0	\$2,531.70

9/11/2020	5,905	yes	\$1.75	\$0.22	\$11,632.85
9/11/2020	19,027	no	\$1.70	\$0	\$32,345.90
9/29/2020	5,122	no	\$1.74	\$0	\$8,912.28
9/30/2020	6,060	no	\$1.70	\$0	\$10,302
FY21 (44 trades)					
10/16/2020	5,891	no	\$1.74	\$0	\$10,250.34
10/22/2020	20,357	yes	\$1.69	\$0.28	\$40,103.29
11/10/2020	1,140	no	\$1.70	\$0	\$1,938
11/11/2020	2,775	yes	\$1.77	\$0.20	\$5,466.75
11/30/2020	903	yes	\$1.77	\$0.20	\$1,778.91
12/4/2020	985	yes	\$1.77	\$0.20	\$1,940.45
12/9/2020	1,740	no	\$1.68	\$0	\$2,923.20
12/21/2020	8,469	no	\$1.65	\$0	\$13,973.85
12/28/2020	2,000	yes	\$1.70	\$0	\$3,400
1/5/2021	2,987	no	\$1.61	\$0	\$4,809.07
1/29/2021	17,550	yes	\$1.50	\$0	\$26,325
2/11/2021	3,077	yes	\$1.68	\$0.38	\$6,323.24
2/21/2021	782	no	\$1.60	\$0	\$1,251.20
2/24/2021	1,859	no	\$1.62	\$0	\$3,011.58
2/26/2021	1,055	no	\$1.60	\$0	\$1,688
3/30/2021	328	no	\$1.40	\$0	\$459.20
4/5/2021	1,265	no	\$1.50	\$0	\$1,897.50
4/14/2021	438	no	\$1.64	\$0	\$718.32
4/15/2021	834	yes	\$1.70	\$0	\$1,417.80
4/15/2021	1,431	no	\$1.50	\$0	\$2,146.50
4/22/2021	651	no	\$1.64	\$0	\$1,067.64
4/22/2021	2,142	no	\$1.64	\$0	\$3,512.88
4/30/2021	6,488	no	\$2	\$0	\$12,976
5/24/2021	223	yes	\$1.79	\$0.32	\$470.53
5/24/2021	1,050	yes	\$1.79	\$0.32	\$2,215.50
6/1/2021	710	yes	\$1.70	\$0.37	\$1,466.15
6/3/2021	2,343	no	\$1.50	\$0	\$3,514.50
6/8/2021	16,291	no	\$1.50	\$0	\$24,436.50
6/15/2021	2,361	no	\$1.50	\$0	\$3,541.50
6/23/2021	6,403	yes	\$1.79	\$0.33	\$13,574.36
6/24/2021	5,876	no	\$1.50	\$0	\$8,814
6/30/2021	1,052	yes	\$1.66	\$0.39	\$2,151.34
7/6/2021	337	no	\$1.50	\$0	\$505.50
7/8/2021	3,976	no	\$1.50	\$0	\$5,964
7/21/2021	9,917	no	\$2	\$0	\$19,834
7/22/2021	1,750	yes	\$1.79	\$0.32	\$3,692.50
7/23/2021	3,778	no	\$1.50	\$0	\$5,667
7/23/2021	3,900	no	\$1.50	\$0	\$5,850
7/29/2021	67,512	no	\$1.50	\$0	\$101,268
8/17/2021	6182	yes	\$1.74	\$0.36	\$12,951.29

8/19/2021	71,083	yes	\$1.45	\$0.63	\$147,852.64
8/30/2021	1071	no	\$1.50	\$0	\$1,606.50
9/20/2021	894	no	\$1.40	\$0	\$1,251.60
9/21/2021	11,013	no	\$1.50	\$0	\$16,519.50
TOTAL/AVERAGE	920,748		\$1.68	\$0.33	\$1,633,805.55

Appendix Table E: Offv Compliance in FY20 and FY21

Offv Compliance Start Date	Offv (gallons)	SRCs Used	ILF Payment	Gallons of Offv Met with ILF	Notes
9/21/2021	621	621			Renewed Offv Compliance
9/13/2021	25,258	25,258			Renewed Offv Compliance
9/2/2021	710	710			End of Construction
9/1/2021	3,058	3,058			Renewed Offv Compliance
8/28/2021	9,917	9,917			Renewed Offv Compliance
8/27/2021	18,025	18,025			Renewed Offv Compliance
8/25/2021	1,265	1,265			End of Construction
8/24/2021	584	584			Renewed Offv Compliance
8/21/2021	3,900	3,900			Renewed Offv Compliance
8/19/2021	3,976	3,976			Renewed Offv Compliance
8/11/2021	2,324	2,324			Renewed Offv Compliance
7/25/2021	223	223			Renewed Offv Compliance
7/11/2021	2,142	2,142			Renewed Offv Compliance
7/9/2021	5,876	5,876			Renewed Offv Compliance
7/6/2021	328	328			End of Construction
7/1/2021	14,010	14,010			Renewed Offv Compliance
7/1/2021	71,083	71,083			Renewed Offv Compliance
6/28/2021	2,343	2,343			Renewed Offv Compliance
6/27/2021	651	651			Renewed Offv Compliance
6/26/2021	249	249			Renewed Offv Compliance
6/21/2021	834	834			End of Construction
6/18/2021	589	589			Renewed Offv Compliance
6/15/2021	6,403	6,403			Renewed Offv Compliance
6/5/2021	14,730	14,730			Renewed Offv Compliance
5/31/2021	438	438			Renewed Offv Compliance
5/23/2021	16,291	16,291			Renewed Offv Compliance
5/14/2021	6,663	6,663			End of Construction
5/13/2021	1,431	1,431			Renewed Offv Compliance
5/5/2021	218	218			Renewed Offv Compliance
4/30/2021	4,792	4,792			Renewed Offv Compliance
4/25/2021	9,909	9,909			Renewed Offv Compliance
4/20/2021	2,878	2,878			End of Construction
4/11/2021	8,229	8,229			Renewed Offv Compliance
4/4/2021	24,505	24,505			Renewed Offv Compliance
3/29/2021	1,859	1,859			Renewed Offv Compliance
3/26/2021	1,755	1,755			Renewed Offv Compliance
3/22/2021	3,077	3,077			Renewed Offv Compliance
3/15/2021	782	782			Renewed Offv Compliance
3/11/2021	2,649	2,649			End of Construction

3/4/2021	1,055	1,055			Renewed Offv Compliance
3/1/2021	11,453	11,453			Renewed Offv Compliance
2/22/2021	19,349	19,349			Renewed Offv Compliance
2/22/2021	1,050	1,050			Renewed Offv Compliance
2/21/2021	1,314	1,314			Renewed Offv Compliance
2/13/2021	639	639			Renewed Offv Compliance
2/10/2021	4,177	4,177			Renewed Offv Compliance
2/5/2021	2,798	2,798			Renewed Offv Compliance
2/4/2021	10,165	10,165			End of Construction
1/23/2021	3,708	3,708			Renewed Offv Compliance
1/15/2021	1,935	1,935			Renewed Offv Compliance
1/9/2021	380	380			Renewed Offv Compliance
1/9/2021	2,960	2,960			End of Construction
1/7/2021	548	548			Renewed Offv Compliance
1/7/2021	1,740	1,740			Renewed Offv Compliance
12/27/2020	1,825	1,825			Renewed Offv Compliance
12/20/2020	903	903			Renewed Offv Compliance
12/18/2020	389	389			Renewed Offv Compliance
12/11/2020	5,244	5,857			End of Construction
12/11/2020	3,556	3,556			Renewed Offv Compliance
12/10/2020	2,775	2,775			Renewed Offv Compliance
12/10/2020	3,030	3,030			End of Construction
12/8/2020	4,551	4,551			End of Construction
12/7/2020	1,052	1,052			Renewed Offv Compliance
11/21/2020	705	705			Renewed Offv Compliance
11/17/2020	1,431	1,431			End of Construction
11/17/2020	3,589	3,589			End of Construction
11/16/2020	4,950	4,950			Renewed Offv Compliance
11/6/2020	355	355			Renewed Offv Compliance
11/4/2020	451	451			Renewed Offv Compliance
10/31/2020	11,013	11,013			Renewed Offv Compliance
10/26/2020	10,548	10,548			Renewed Offv Compliance
10/23/2020	765	765			End of Construction
10/19/2020	1,411	1,411			Renewed Offv Compliance
10/17/2020	2,281	2,281			Renewed Offv Compliance
10/17/2020	298	298			Renewed Offv Compliance
10/14/2020	534	534			Renewed Offv Compliance
10/8/2020	284	284			Renewed Offv Compliance
10/4/2020	1,622	1,622			Renewed Offv Compliance
10/2/2020	139	139			Renewed Offv Compliance
9/26/2020	19,027	19,027			Renewed Offv Compliance
9/21/2020	621	621			Renewed Offv Compliance
9/17/2020	5,905	5,905			Renewed Offv Compliance
9/13/2020	25,258	25,258			Renewed Offv Compliance
9/7/2020	1,455	1,455			Renewed Offv Compliance

8/28/2020	9,917	9,917			End of Construction
8/27/2020	18,025	18,025			Renewed Offv Compliance
8/24/2020	584	584			Renewed Offv Compliance
8/21/2020	3,382	3,382			End of Construction
8/21/2020	3,900	3,900			End of Construction
8/19/2020	3,976	3,976			Renewed Offv Compliance
8/11/2020	2,324	2,324			Renewed Offv Compliance
7/25/2020	223	223			Renewed Offv Compliance
7/11/2020	2,142	2,142			Renewed Offv Compliance
7/9/2020	5,876	5,876			End of Construction
7/1/2020	71,083	71,083			Renewed Offv Compliance
7/1/2020	14,010	14,010			Renewed Offv Compliance
6/28/2020	2,343	2,343			Renewed Offv Compliance
6/27/2020	651	651			Renewed Offv Compliance
6/26/2020	249	249			Renewed Offv Compliance
6/20/2020	16,291	16,291			Renewed Offv Compliance
6/18/2020	589	589			Renewed Offv Compliance
6/15/2020	6,403	6,403			Renewed Offv Compliance
6/5/2020	12,671	15,839 ⁶			Renewed Offv Compliance
5/31/2020	438	438			Renewed Offv Compliance
5/13/2020	1,431	1,431			End of Construction
5/5/2020	218	218			Renewed Offv Compliance
4/30/2020	4,792	4,792			Renewed Offv Compliance
4/25/2020	9,909	9,909			Renewed Offv Compliance
4/11/2020	8,229	8,229			Renewed Offv Compliance
4/4/2020	24,505	24,505			Renewed Offv Compliance
3/29/2020	1,859	1,859			Renewed Offv Compliance
3/26/2020	1,755	1,755			End of Construction
3/22/2020	3,077	3,077			Renewed Offv Compliance
3/15/2020	782	782			Renewed Offv Compliance
3/4/2020	1,055	1,055			Renewed Offv Compliance
3/1/2020	11,453	11,453			Renewed Offv Compliance
2/22/2020	1,050	1,050			Renewed Offv Compliance
2/22/2020	19,349	19,349			Renewed Offv Compliance
2/21/2020	1,314	1,314			Renewed Offv Compliance
2/13/2020	639	639			Renewed Offv Compliance
2/10/2020	4,177	4,177			Renewed Offv Compliance
2/5/2020	2,798	2,798			Renewed Offv Compliance
1/23/2020	3,708	3,708			Renewed Offv Compliance
1/15/2020	1,935	1,935			End of Construction
1/9/2020	380	380			Renewed Offv Compliance
1/7/2020	548	548			Renewed Offv Compliance

⁶ This site is an Anacostia Waterfront Development Zone (AWDZ) site. AWDZ sites must use 1.25 times more SRCs if the SRCs used are not from the Anacostia watershed, which was the case here.

1/7/2020	1,740	1,740			End of Construction
12/27/2019	1,825	1,825			Renewed Offv Compliance
12/20/2019	903	903			Renewed Offv Compliance
12/18/2019	389	389			Renewed Offv Compliance
12/11/2019	3,556	3,556			End of Construction
12/10/2019	2,775		\$10,017.75	2775	Renewed Offv Compliance
12/7/2019	1,052	1,052			Renewed Offv Compliance
11/21/2019	705	705			Renewed Offv Compliance
11/16/2019	4,950	4,950			Renewed Offv Compliance
11/6/2019	355	355			End of Construction
10/31/2019	11,013	11,013			Renewed Offv Compliance
10/26/2019	10,548	10,548			Renewed Offv Compliance
10/19/2019	1,411	1,411			Renewed Offv Compliance
10/17/2019	2,281	2,281			Renewed Offv Compliance
10/17/2019	298	298			End of Construction
10/14/2019	534	534			Renewed Offv Compliance
10/8/2019	284	284			End of Construction
10/4/2019	1,622		\$5,855.42	1622	Renewed Offv Compliance
TOTAL	780,094	784,114	\$15,873	4,397	

Appendix Table F: SRCs Used in FY20-21

Number of SRCs	Certification Date	Certification Watershed	Certification Sewershed	Use Date	Use Watershed	Use Sewershed
19,027	4/21/2021	Anacostia	MS4	9/26/2021	Anacostia	CSS
621	2/20/2018	Potomac	MS4	9/21/2021	Anacostia	CSS
5,905	10/1/2021	Anacostia	MS4	9/17/2021	Potomac	MS4
25,258	2/20/2019	Potomac	MS4	9/13/2021	Potomac	MS4
1,455	4/21/2021	Anacostia	MS4	9/7/2021	Anacostia	CSS
710	2/2/2021	Anacostia	MS4	9/2/2021	Anacostia	CSS
3,058	4/20/2021	Anacostia	MS4	9/1/2021	Anacostia	CSS
9,917	3/23/2020	Anacostia	CSS	8/28/2021	Anacostia	MS4
18,025	2/20/2018	Potomac	MS4	8/27/2021	Potomac	MS4
1,265	2/20/2018	Potomac	MS4	8/25/2021	Anacostia	MS4
584	2/20/2018	Potomac	MS4	8/24/2021	Rock Creek	CSS
3,900	2/20/2018	Potomac	MS4	8/21/2021	Anacostia	CSS
3,382	4/21/2021	Anacostia	MS4	8/21/2021	Potomac	CSS
3,976	1/29/2021	Rock Creek	CSS	8/19/2021	Anacostia	CSS
337	2/20/2018	Potomac	MS4	8/13/2021	Anacostia	CSS
1,219	1/29/2020	Rock Creek	CSS	8/11/2021	Anacostia	CSS
1,105	1/29/2019	Rock Creek	CSS	8/11/2021	Anacostia	CSS
223	2/2/2021	Anacostia	MS4	7/25/2021	Anacostia	MS4
2,142	2/20/2018	Potomac	MS4	7/11/2021	Anacostia	CSS
5,876	2/20/2018	Potomac	MS4	7/9/2021	Potomac	CSS
328	7/13/2022	Rock Creek	MS4	7/6/2021	Anacostia	CSS
56,636	2/2/2023	Anacostia	MS4	7/1/2021	Potomac	MS4
14,447	2/2/2021	Anacostia	MS4	7/1/2021	Potomac	MS4
14,010	9/28/2019	Anacostia	MS4	7/1/2021	Anacostia	MS4
2,343	2/20/2018	Potomac	MS4	6/28/2021	Potomac	CSS
651	2/20/2020	Potomac	MS4	6/27/2021	Rock Creek	CSS
249	2/20/2018	Potomac	MS4	6/26/2021	Anacostia	CSS
834	8/7/2021	Potomac	MS4	6/21/2021	Potomac	MS4
589	4/16/2020	Anacostia	CSS	6/18/2021	Rock Creek	MS4
11,121	6/17/2019	Anacostia	MS4	6/15/2021	Potomac	MS4
8,654	6/14/2022	Anacostia	MS4	6/5/2021	Anacostia	MS4
5,313	7/7/2022	Anacostia	MS4	6/5/2021	Anacostia	MS4
808	7/7/2021	Anacostia	MS4	6/5/2021	Anacostia	MS4
438	2/20/2018	Potomac	MS4	5/31/2021	Potomac	CSS
16,291	2/20/2018	Potomac	MS4	5/23/2021	Potomac	MS4
6,663	7/22/2020	Potomac	CSS	5/14/2021	Anacostia	CSS
1,431	2/20/2018	Potomac	MS4	5/13/2021	Anacostia	CSS
224	5/1/2021	Anacostia	MS4	5/5/2021	Anacostia	MS4
4,382	5/4/2021	Anacostia	MS4	4/30/2021	Anacostia	MS4
205	5/4/2020	Anacostia	MS4	4/30/2021	Anacostia	MS4
205	5/4/2022	Anacostia	MS4	4/30/2021	Anacostia	MS4
9,274	7/1/2020	Potomac	MS4	4/25/2021	Anacostia	MS4

635	7/1/2021	Potomac	MS4	4/25/2021	Anacostia	MS4
2,878	2/20/2018	Potomac	MS4	4/20/2021	Potomac	CSS
2,114	6/11/2015	Potomac	MS4	4/11/2021	Potomac	MS4
2,114	5/16/2019	Potomac	MS4	4/11/2021	Potomac	MS4
2,114	5/16/2020	Potomac	MS4	4/11/2021	Potomac	MS4
1,154	6/11/2016	Potomac	MS4	4/11/2021	Potomac	MS4
733	6/11/2017	Potomac	MS4	4/11/2021	Potomac	MS4
24,505	2/20/2020	Potomac	MS4	4/4/2021	Potomac	MS4
1,859	2/20/2018	Potomac	MS4	3/29/2021	Rock Creek	CSS
1,755	8/7/2020	Potomac	MS4	3/26/2021	Anacostia	CSS
3,077	2/2/2021	Anacostia	MS4	3/22/2021	Anacostia	CSS
782	7/13/2022	Rock Creek	MS4	3/15/2021	Anacostia	CSS
2,649	4/16/2018	Anacostia	CSS	3/11/2021	Potomac	MS4
731	7/13/2022	Rock Creek	MS4	3/4/2021	Rock Creek	MS4
324	7/13/2021	Rock Creek	MS4	3/4/2021	Rock Creek	MS4
11,453	9/28/2020	Anacostia	MS4	3/1/2021	Anacostia	MS4
19,349	6/17/2019	Anacostia	MS4	2/22/2021	Anacostia	MS4
1,050	2/20/2018	Potomac	MS4	2/22/2021	Potomac	MS4
1,314	4/23/2018	Anacostia	CSS	2/21/2021	Potomac	CSS
639	3/8/2021	Potomac	MS4	2/13/2021	Rock Creek	MS4
4,177	3/8/2021	Potomac	MS4	2/10/2021	Potomac	CSS
2,798	2/20/2018	Potomac	MS4	2/5/2021	Anacostia	CSS
10,165	6/16/2022	Anacostia	MS4	2/4/2021	Anacostia	CSS
17,670	3/8/2019	Potomac	MS4	2/2/2021	Potomac	MS4
3,708	3/25/2021	Anacostia	MS4	1/23/2021	Anacostia	MS4
1,935	6/6/2018	Anacostia	MS4	1/15/2021	Anacostia	MS4
2,960	2/20/2018	Potomac	MS4	1/9/2021	Anacostia	MS4
380	7/13/2022	Rock Creek	MS4	1/9/2021	Anacostia	CSS
1,740	2/20/2018	Potomac	MS4	1/7/2021	Anacostia	CSS
548	3/4/2019	Potomac	CSS	1/7/2021	Potomac	CSS
1,825	5/10/2018	Anacostia	MS4	12/27/2020	Potomac	MS4
903	6/16/2022	Anacostia	MS4	12/20/2020	Anacostia	CSS
389	3/26/2018	Anacostia	MS4	12/18/2020	Anacostia	CSS
5,244	3/28/2020	Anacostia	CSS	12/11/2020	Anacostia	CSS
3,556	12/4/2021	Anacostia	MS4	12/11/2020	Anacostia	MS4
613	3/28/2019	Anacostia	CSS	12/11/2020	Anacostia	CSS
3,030	7/13/2020	Rock Creek	MS4	12/10/2020	Anacostia	MS4
2,775	6/16/2021	Anacostia	MS4	12/10/2020	Anacostia	MS4
4,551	4/16/2018	Anacostia	CSS	12/8/2020	Anacostia	CSS
1,052	2/2/2021	Anacostia	MS4	12/7/2020	Anacostia	CSS
705	2/20/2018	Potomac	MS4	11/21/2020	Anacostia	CSS
3,589	12/7/2020	Potomac	CSS	11/17/2020	Potomac	CSS
1,405	4/23/2020	Anacostia	CSS	11/17/2020	Potomac	CSS
26	4/23/2018	Anacostia	CSS	11/17/2020	Potomac	CSS
4,950	6/16/2021	Anacostia	MS4	11/16/2020	Anacostia	CSS

355	3/8/2020	Potomac	MS4	11/6/2020	Rock Creek	CSS
451	3/8/2020	Potomac	MS4	11/4/2020	Potomac	MS4
11,013	2/20/2018	Potomac	MS4	10/31/2020	Anacostia	CSS
6,837	4/15/2019	Anacostia	CSS	10/26/2020	Potomac	MS4
3,335	4/15/2021	Anacostia	CSS	10/26/2020	Potomac	MS4
376	4/15/2020	Anacostia	CSS	10/26/2020	Potomac	MS4
765	6/17/2020	Anacostia	MS4	10/23/2020	Rock Creek	CSS
1,411	3/8/2021	Potomac	MS4	10/19/2020	Anacostia	MS4
2,206	4/23/2019	Anacostia	CSS	10/17/2020	Anacostia	CSS
298	2/20/2018	Potomac	MS4	10/17/2020	Anacostia	CSS
75	4/23/2018	Anacostia	CSS	10/17/2020	Anacostia	CSS
534	1/29/2015	Rock Creek	CSS	10/14/2020	Anacostia	CSS
284	2/20/2020	Potomac	MS4	10/8/2020	Anacostia	CSS
1,622	3/20/2021	Anacostia	MS4	10/4/2020	Anacostia	MS4
19,027	2/20/2018	Potomac	MS4	9/26/2020	Anacostia	CSS
621	2/20/2018	Potomac	MS4	9/21/2020	Anacostia	CSS
4,256	6/16/2020	Anacostia	MS4	9/17/2020	Potomac	MS4
1,391	6/16/2021	Anacostia	MS4	9/17/2020	Potomac	MS4
258	6/16/2022	Anacostia	MS4	9/17/2020	Potomac	MS4
25,258	2/20/2019	Potomac	MS4	9/13/2020	Potomac	MS4
1,455	2/20/2020	Potomac	MS4	9/7/2020	Anacostia	CSS
9,917	3/23/2020	Anacostia	CSS	8/28/2020	Anacostia	MS4
18,025	2/20/2018	Potomac	MS4	8/27/2020	Potomac	MS4
584	2/20/2018	Potomac	MS4	8/24/2020	Rock Creek	CSS
3,382	2/20/2020	Potomac	MS4	8/21/2020	Potomac	CSS
1,513	9/9/2021	Rock Creek	CSS	8/21/2020	Anacostia	CSS
1,158	9/9/2019	Rock Creek	CSS	8/21/2020	Anacostia	CSS
1,158	9/9/2020	Rock Creek	CSS	8/21/2020	Anacostia	CSS
71	9/9/2020	Rock Creek	CSS	8/21/2020	Anacostia	CSS
3,976	4/15/2019	Anacostia	CSS	8/19/2020	Anacostia	CSS
2,324	1/29/2019	Rock Creek	CSS	8/11/2020	Anacostia	CSS
223	6/17/2020	Anacostia	MS4	7/25/2020	Anacostia	MS4
2,142	2/20/2018	Potomac	MS4	7/11/2020	Anacostia	CSS
5,876	4/15/2020	Anacostia	CSS	7/9/2020	Potomac	CSS
41,396	6/17/2020	Anacostia	MS4	7/1/2020	Potomac	MS4
29,687	6/17/2021	Anacostia	MS4	7/1/2020	Potomac	MS4
11,453	9/28/2020	Anacostia	MS4	7/1/2020	Anacostia	MS4
2,557	9/28/2019	Anacostia	MS4	7/1/2020	Anacostia	MS4
2,343	2/20/2018	Potomac	MS4	6/28/2020	Potomac	CSS
443	2/20/2018	Potomac	MS4	6/27/2020	Rock Creek	CSS
198	4/20/2017	Potomac	MS4	6/27/2020	Rock Creek	CSS
10	2/20/2019	Potomac	MS4	6/27/2020	Rock Creek	CSS
249	2/20/2018	Potomac	MS4	6/26/2020	Anacostia	CSS
10,770	2/20/2019	Potomac	MS4	6/20/2020	Potomac	MS4
3,656	6/1/2020	Potomac	MS4	6/20/2020	Potomac	MS4

1,865	6/1/2019	Potomac	MS4	6/20/2020	Potomac	MS4
589	4/16/2020	Anacostia	CSS	6/18/2020	Rock Creek	MS4
6,403	6/17/2021	Anacostia	MS4	6/15/2020	Potomac	MS4
10,732	3/8/2020	Potomac	MS4	6/5/2020	Anacostia	MS4
5,072	3/8/2019	Potomac	MS4	6/5/2020	Anacostia	MS4
35	9/24/2016	Potomac	MS4	6/5/2020	Anacostia	MS4
438	2/20/2018	Potomac	MS4	5/31/2020	Potomac	CSS
1,431	6/17/2020	Anacostia	MS4	5/13/2020	Anacostia	CSS
224	5/1/2020	Anacostia	MS4	5/5/2020	Anacostia	MS4
4,792	5/4/2020	Anacostia	MS4	4/30/2020	Anacostia	MS4
5,951	4/15/2020	Anacostia	CSS	4/25/2020	Anacostia	MS4
3,958	4/15/2021	Anacostia	CSS	4/25/2020	Anacostia	MS4
8,051	5/16/2020	Potomac	MS4	4/11/2020	Potomac	MS4
178	6/11/2017	Potomac	MS4	4/11/2020	Potomac	MS4
24,505	2/20/2019	Potomac	MS4	4/4/2020	Potomac	MS4
1,859	2/20/2018	Potomac	MS4	3/29/2020	Rock Creek	CSS
1,755	2/20/2018	Potomac	MS4	3/26/2020	Anacostia	CSS
3,077	6/17/2020	Anacostia	MS4	3/22/2020	Anacostia	CSS
782	2/20/2018	Potomac	MS4	3/15/2020	Anacostia	CSS
1,055	2/20/2018	Potomac	MS4	3/4/2020	Rock Creek	MS4
9,216	8/18/2016	Anacostia	MS4	3/1/2020	Anacostia	MS4
755	9/28/2018	Anacostia	MS4	3/1/2020	Anacostia	MS4
755	9/28/2019	Anacostia	MS4	3/1/2020	Anacostia	MS4
627	9/28/2020	Anacostia	MS4	3/1/2020	Anacostia	MS4
100	8/18/2015	Anacostia	MS4	3/1/2020	Anacostia	MS4
19,349	6/17/2019	Anacostia	MS4	2/22/2020	Anacostia	MS4
1,050	2/20/2018	Potomac	MS4	2/22/2020	Potomac	MS4
1,314	4/23/2018	Anacostia	CSS	2/21/2020	Potomac	CSS
639	3/8/2021	Potomac	MS4	2/13/2020	Rock Creek	MS4
4,177	3/8/2020	Potomac	MS4	2/10/2020	Potomac	CSS
2,798	2/20/2018	Potomac	MS4	2/5/2020	Anacostia	CSS
3,708	2/22/2019	Anacostia	MS4	1/23/2020	Anacostia	MS4
1,935	6/6/2018	Anacostia	MS4	1/15/2020	Anacostia	MS4
380	8/15/2019	Rock Creek	CSS	1/9/2020	Anacostia	CSS
1,740	2/20/2018	Potomac	MS4	1/7/2020	Anacostia	CSS
548	3/4/2019	Potomac	CSS	1/7/2020	Potomac	CSS
1,825	5/10/2018	Anacostia	MS4	12/27/2019	Potomac	MS4
903	10/27/2015	Potomac	CSS	12/20/2019	Anacostia	CSS
389	3/26/2018	Anacostia	MS4	12/18/2019	Anacostia	CSS
3,556	2/20/2018	Potomac	MS4	12/11/2019	Anacostia	MS4
1,052	2/20/2019	Potomac	MS4	12/7/2019	Anacostia	CSS
705	2/20/2018	Potomac	MS4	11/21/2019	Anacostia	CSS
4,950	2/20/2018	Potomac	MS4	11/16/2019	Anacostia	CSS
355	3/8/2020	Potomac	MS4	11/6/2019	Rock Creek	CSS
11,013	2/20/2018	Potomac	MS4	10/31/2019	Anacostia	CSS

10,548	3/28/2019	Anacostia	CSS	10/26/2019	Potomac	MS4
1,411	3/8/2019	Potomac	MS4	10/19/2019	Anacostia	MS4
2,206	4/23/2019	Anacostia	CSS	10/17/2019	Anacostia	CSS
298	2/20/2018	Potomac	MS4	10/17/2019	Anacostia	CSS
75	4/23/2018	Anacostia	CSS	10/17/2019	Anacostia	CSS
534	1/29/2015	Rock Creek	CSS	10/14/2019	Anacostia	CSS
284	2/20/2020	Potomac	MS4	10/8/2019	Anacostia	CSS