

North American Wetlands Conservation Fund

Appropriations Language

For expenses necessary to carry out the provisions of the North American Wetlands Conservation Act, Public Law 101-233, as amended, [\$38,000,000] *\$54,000,000, to be derived from the Land and Water Conservation Fund*, to remain available until expended. (*Department of the Interior and Related Agencies Appropriations Act, 2004.*)

Justification of Language Change

Addition: “*to be derived from the Land and Water Conservation Fund,*”

The budget proposes that funding for the North American Wetlands Conservation Fund program be derived from the Land and Water Conservation Fund as part of the President's 2005 budget.

Authorizing Statutes

North American Wetlands Conservation Act of 1989 (16 U.S.C. 4401). Section 4406 of the Act (NAWCA) authorizes fines, penalties, and forfeitures from violations of the Migratory Bird Treaty Act to be made available for wetlands conservation projects. Section 4407 authorizes interest on excise taxes for hunting equipment deposited for wetlands conservation grants and costs for administering this grant program. The Act authorizes appropriations to be used to encourage partnerships among public agencies and other interests to protect, enhance, restore, and manage wetland ecosystems and other habitats for migratory birds and other fish and wildlife; to maintain current or improved distributions of migratory bird populations; and to sustain an abundance of waterfowl and other migratory birds consistent with goals of the North American Waterfowl Management Plan and international obligations with other countries. The Act authorizes annual appropriations not to exceed \$55 million in FY 2003, \$60 million in FY 2004, and increasing annually by \$5 million until reaching an amount not to exceed \$75 million in FY 2007. The allocation of funds available for projects in Canada and Mexico is “at least 30 per cent and not more than 60 per cent” and the allocation of funds available for projects in the United States is “at least 40 percent and not more than 70 percent.” *Coastal Wetlands Planning, Protection and Restoration Act* funds are available only for U.S. projects.

Coastal Wetlands Planning, Protection and Restoration Act (16 U.S.C. 3951-3956). Establishes the National Coastal Wetlands Planning, Protection and Restoration Program within the Sport Fish Restoration Account for projects authorized by NAWCA in coastal states. Authorization of Appropriations expires September 30, 2009.

Aquatic Resources Trust Fund (26 U.S.C. 9504). Authorizes appropriations from the Sport Fish Restoration Account to carry out the *Coastal Wetlands Planning, Protection and Restoration Act*.

Other Authorizations

Appropriations Act of August 31, 1951 (P.L. 82-136, 65 Stat. 261)
Federal Aid in Wildlife Restoration Act of 1937, as amended (16 U.S.C. 669-669i)
Migratory Bird Conservation Act, as amended (16 U.S.C. 715)
Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703-712)
Nonindigenous Aquatic Nuisance Prevention and Control Act, as amended (16 U.S.C. 4701 et seq.)

Federal Aid in Fish Restoration Act, as amended (16 U.S.C. 777-777k)

North American Wetlands Conservation Fund	2003 Actual	2004 Enacted	Uncontrollable & Related Changes (+/-)	Program Changes	2005 Budget Request	Change From 2004 (+/-)
<i>Appropriations:</i>						
Wetlands Conservation \$(000)	36,777	36,031	0	15,809	51,840	15,809
Administration \$(000)	1,532	1,501	0	659	2,160	659
CAM (see General Business Operations) \$(000)	[452]	[TBD]*	0	0	[TBD]*	0
<i>FTE</i>	<i>17</i>	<i>11</i>	<i>0</i>	<i>0</i>	<i>11</i>	<i>0</i>
Subtotal, Appropriations \$(000)	38,309	37,532	0	16,468	54,000	16,468
<i>Receipts:</i>						
Migratory Bird Treaty \$(000)	429	480	0	0	480	0
Administration \$(000)	18	20	0	0	20	0
Total, North American Wetlands Conservation Fund \$(000)	38,756	38,032	0	16,468	54,500	16,468
<i>FTE</i>	<i>17</i>	<i>11</i>	<i>0</i>	<i>0</i>	<i>11</i>	<i>0</i>
North American Wetlands Conservation Fund Receipts from Other Accounts						
<i>Receipts:</i>						
Wetlands Conservation (in Federal Aid in Wildlife Restoration Account) \$(000)	[9,938]	[11,543]	[0]	[-978]	[10,565]	[-978]
Administration \$(000)	[414]	[481]	[0]	[-41]	[440]	[-41]
<i>FTE</i>	<i>[7]</i>	<i>[7]</i>	<i>[0]</i>	<i>[0]</i>	<i>[7]</i>	<i>[0]</i>
Subtotal, Federal Aid in Wildlife Restoration Account \$(000)	[10,352]	[12,024]	[0]	[-1,019]	[11,005]	[-1,019]
<i>FTE</i>	<i>[7]</i>	<i>[7]</i>	<i>[0]</i>	<i>[0]</i>	<i>[7]</i>	<i>[0]</i>
Coastal Wetlands Conservation (in Sport Fish Restoration Account) \$(000)	[12,201]	[12,648]	[0]	[+755]	[13,403]	[+755]
<i>FTE</i>	<i>[7]</i>	<i>[7]</i>	<i>[0]</i>	<i>[0]</i>	<i>[7]</i>	<i>[0]</i>

* The Service is reviewing the Cost Allocation Methodology and will provide a FY 2005 budget proposal by April 15, 2004.

Program Overview

The NAWCA grant program is an internationally-recognized program that provides grants throughout the U.S., Canada, and Mexico and is one of the key instruments for conservation of waterfowl and other migratory birds. For over 13 years, the NAWCA grant program, through voluntary grant partnerships, has both protected and improved the health and integrity of the landscapes in which people reside and work in harmony with our fish and wildlife resources. To date, the Service together with over 2,200 partners has advanced 1,237 projects in 50 U.S. states, the U.S. Virgin Islands, 13 Canadian provinces and 25 Mexican states.

Country	Protected Acres	Enhanced, Restored, and Created Acres	Number of Projects
Canada	5,143,210	2,718,772	391
Mexico	232,743	494,853	160
U.S.	2,047,501	2,144,447	686
All Countries	7,423,454	5,358,072	1,237

Acres represent total proposed acres approved for funding, to date, including the first round of FY 2004 grants. Some acres are included in both "Protected" and "Enhanced, Restored and Created" due to multiple activities occurring on the same property. Therefore, while the two categories should not be added to demonstrate total acres affected, it can be said that approximately 10.5 million acres have been affected by protection, enhancement, or restoration activities. Table compiled January 2004.

The NAWCA program, which is implemented on both public and private lands, continues to support the Secretary's Four C's vision -- Communication, Consultation, and Coordination in support of Conservation. NAWCA matching grants are awarded to a variety of private landowners, states, non-governmental conservation organizations, tribes, federal agencies, trusts, and corporations.

The NAWCA program supports the DOI Strategic Goal of Resource Protection. Through voluntary habitat restoration projects, this program furthers the DOI End Outcome Goal to sustain biological communities (PIM.2.01.001 – Habitat restoration: Number of acres restored or enhanced to achieve habitat consistent with management documents, program objectives, and consistent with substantive and procedural requirements of State and federal law; and, PIM.2.01.002 – Habitat restoration: Number of stream/shoreline miles restored or enhanced to achieve habitat consistent with management plans, program objectives, and consistent with substantive and procedural requirements of State and federal law).

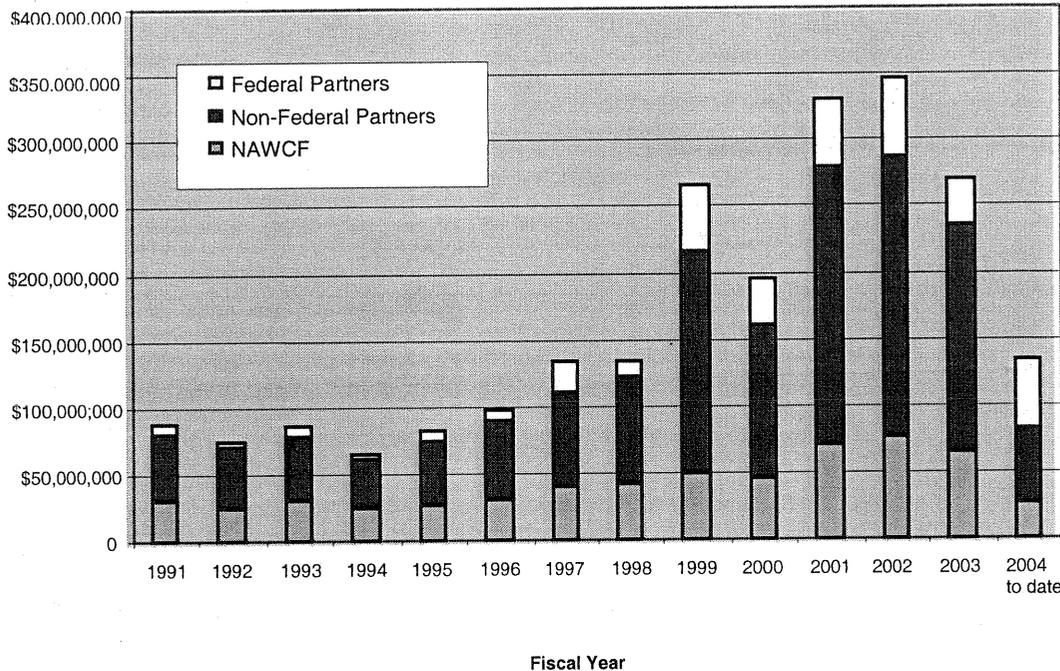
NAWCA grants support the goals of the North American Waterfowl Management Plan (NAWMP), signed by the U.S., Canada and Mexico, which responds to the loss of wetland habitats essential to the survival of waterfowl populations and other migratory bird species. In addition to advancing the North American Waterfowl Management Plan, NAWCA is widely recognized for advancing many other bird conservation initiatives such as Partners in Flight, the North American Bird Conservation Initiative, the U.S. Shorebird Plan, and the North American Waterbird Conservation Plan.

NAWCA grants act as catalysts in bringing partnerships together to support wetland projects and leverage non-federal funding. These grants successfully:

- Generate average partner contributions 2-3 times in excess of federal NAWCA dollars invested;
- Foster public and private sector cooperation for migratory bird conservation, flood control, erosion control, and water quality;

- Sustain cultural traditions;
- Provide a major source of funds to implement the tri-national North American Waterfowl Management Plan and other national and international bird conservation plans; and,
- Assist in the recovery of endangered and threatened species.

**Partner Funds Leveraged by NAWCF Grants
(Canada, Mexico, United States)**

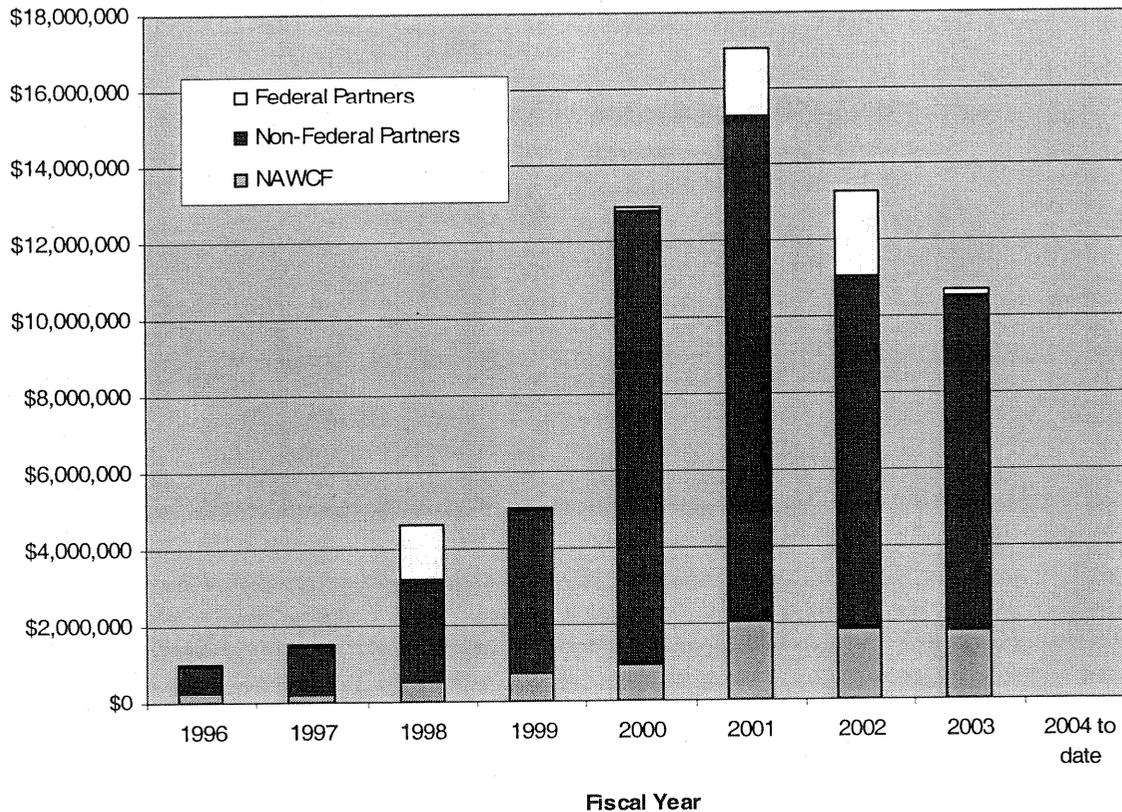


NAWCA administers both a standard and small grants program. The Standard Grants Program is open to applicants in the U.S., Canada, and Mexico. Grant amounts generally range from \$50,000 to \$1,000,000, and must generate an equivalent or greater match in partner funds. The Small Grants Program is available only in the U.S., and is designed to assist partners, that have only modest matching funds, to compete and participate in NAWCA, thus expanding the potential universe of partners and diversity of projects. Small grants may not exceed \$50,000.

For Standard Grants, during the years FY 1991 through FY 2003, approximately 1,800 partners including environmental organizations, sportsmen's groups, corporations, farmers and ranchers, small businesses, federal, state and local governments, and private landowners implemented 991 projects worth over \$2.1 billion under the Act's Standard Grants Program. NAWCA has contributed over \$546 million to support these projects, with partner funds of \$1.56 billion, resulting in a total partner/grant ratio of \$2.85 for every \$1.00 of grant funds. Since 81% of these partners funds are from non-Federal sources, the ratio of non-Federal/grant funds is \$2.31 for every \$1.00 of grant funds. These projects have protected, restored, or enhanced more than 10.5 million acres of wetlands and associated uplands in the U.S. and Canada. In addition, millions of acres within Mexico's large biosphere reserves have benefited from conservation actions including environmental education, management, and planning efforts.

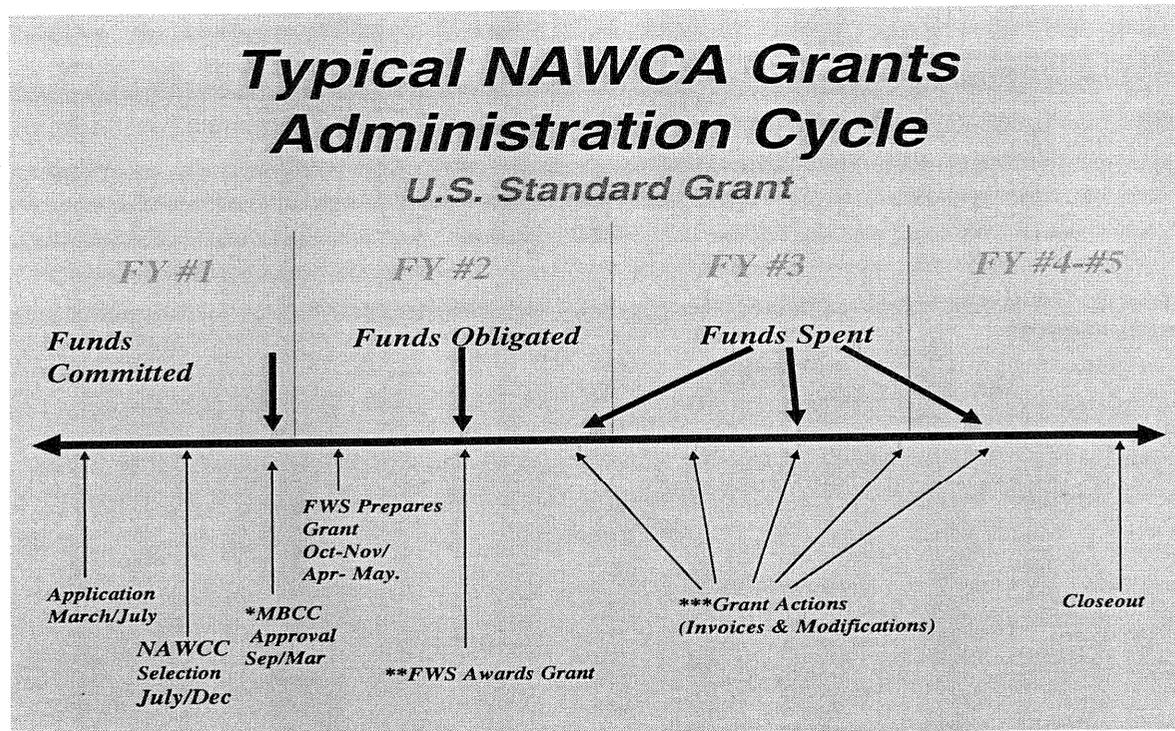
In the U.S., the small grants program started in 1996 with \$250,000. Currently up to \$2 million of NAWCA funds may be used for small grant awards each year, depending upon the availability of qualifying projects. To date, 197 projects have received a total of about \$8.3 million with partners contributing more than \$57.8 million. Small grants continue to leverage nearly eight match dollars for every federal grant dollar. Small grant projects have been funded in 42 states, benefiting an extremely diverse assortment of wetland and wetland-associated upland projects.

Partner Funds Leveraged by Small Grants



A nine-member North American Wetlands Conservation Council recommends projects for final approval by the Migratory Bird Conservation Commission (MBCC). The Council is comprised of the following: the Service Director, the Secretary of the Board of the National Fish and Wildlife Foundation, the Directors of State Fish and Game Agencies representing each of the four migratory bird flyways (Pacific, Central, Atlantic, Mississippi) and representatives from three nonprofit conservation organizations actively involved in wetlands conservation projects.

The MBCC includes the Secretaries of Interior and Agriculture, the Administrator of the Environmental Protection Agency, two U.S. Senators and two U.S. Representatives. The MBCC approves or rejects projects, or may reorder the priority of any Council-recommended project.



May not accurately represent the less complex small grants.

- * 100% of NAWCA grants are approved and committed by the MBCC in the same fiscal year in which those funds are appropriated.
- ** Processing/obligation of grants often requires 6-8 months due to the nature of NAWCA projects and FWS administrative procedures.
- *** Funds are expended as requested by each grantee over the life of the grant, typically 2-3 fiscal years.

The Act authorizes funding from four sources:

- Direct appropriations
- Interest from receipts in the Federal Aid in Wildlife Restoration account
- Fines, penalties and forfeitures resulting from violations of the *Migratory Bird Treaty Act*, and
- Receipts from the Sport Fish Restoration account for U.S. coastal projects (Pacific and Atlantic coastal states, states bordering the Great Lakes, Puerto Rico, the Virgin Islands, Guam, the Commonwealth of the Northern Mariana Islands, and American Samoa).

Section 8.(a)(1) of the Act, as amended, authorizes the Secretary to use up to four percent of appropriated, interest, fines and coastal funding available in a given year for administering the wetlands conservation program. To more efficiently administer the program as well as increase the level of customer service, the Service is implementing enhancements such as incorporating electronic payment systems, assuming programmatic responsibility for grant awards and moving toward electronic grants. All information technology system enhancements are coordinated with the larger DOI effort to implement IT reforms.

2003 Program Performance Accomplishments

In FY 2003, approved NAWCA project proposals are supporting over 125 partnership-driven wetlands conservation projects. Over 460 partners are participating in these projects which when completed will protect over 1,350,000 acres and restore, enhance, or create over 380,000 acres of habitat. Some examples of these initiatives include:

Henry's Fork Wetlands -- Nine project partners will acquire approximately 869 acres and restore or enhance approximately 1528 acres of habitat comprised of about 1483 acres of wetlands and about 45 acres of wetland-associated uplands within the Henry's Fork Watershed and around the Camas National Wildlife Refuge, in Idaho. The NAWCA grant of \$1,000,000 matched with \$2,125,433 will benefit 46 species of wetland dependent migratory birds. The wetland and associated upland habitat affected by this project are critical for four federally listed species, as well as 13 state-listed species.

Izembek National Wildlife Refuge Complex II – The project partner contributed \$2,000,000 as match for a \$987,000 NAWCA grant to directly protect through fee title acquisition an estimated 21,781 acres of wetlands and associated uplands in Alaska's Izembek National Wildlife Refuge Complex. The project will benefit 10 species of geese, 24 species of duck, 24 species of shorebird and will be particularly significant for Pacific Brant, a priority species for the Pacific Coast Joint Venture.

Louisiana Coastal Wetlands II -- Partners working on public and private within the coastal marshes of the Gulf Coast Joint Venture's Chenier Plain will restore an estimated 1,653 acres of decreasing wetlands and enhance an estimated 18,624 acres of decreasing wetlands for a total of approximately 20,277 acres. A \$1,000,000 NAWCA grant was matched with \$1,457,260 and will benefit at least 18 priority and other waterfowl species, 23 other breeding and wintering wetland dependent/associated priority species, and 18 species identified as priority "in-transit migrants of concern".

2004 Planned Program Performance

In FY 2004 the NAWCA is expected to fund approximately 95 projects that will protect, enhance or restore over 1.1 million acres. Approximately 43 project proposals together with over 190 diverse partners have already been approved. When completed, these approved projects will protect over 3,000,000 acres and enhance, restore, or create about 190,000 acres of habitat for migratory birds and other wildlife. Planned projects include:

Mobile-Tensaw Delta Phase IV – Four partners contributed \$3,360,000 to the \$1 million NAWCA grant they received to protect 9,222 acres of mostly declining wetland habitat within the Mobile-Tensaw Delta. Their efforts will directly benefit migratory birds and other wildlife, including 6 species of federally listed and candidate endangered or threatened animals and 32 priority bird species.

Avoca Island Restoration – A public-private partnership received a \$635,460 NAWCA grant to restore and enhance 9,645 acres of key migratory bird wetland habitat within southeastern coastal Louisiana. The partnership contributed an additional \$1,721,143 to the project and will benefit 5 high priority waterfowl species, 4 other priority waterfowl species, 27 NAWCA priority species of other wetland-dependent or wetland-associated birds, as well as an additional 37 species that breed, winter or migrate through the Gulf Coast.

ACE Basin: Edisto River Corridor Protection Project – A diverse partnership received a \$1,000,000 NAWCA grant which was matched with \$2,684,747 to protect in perpetuity, through fee acquisition and easements, an estimated 3,144 acres of habitat including approximately 2,695 acres of wetlands and 449 acres of wetland-associated uplands within the Edisto River Corridor in South Carolina. A total of 56 species of neotropical migrants will benefit as well as the federally listed endangered Wood Stork, Shortnose Sturgeon and threatened Bald Eagle.

Justification of 2005 Program Changes

Subactivity		2005 Budget Request	Program Changes (+/-)
Wetland Conservation	\$(000)	51,840	+15,809
Administration	\$(000)	2,160	+659
Total, NAWCF	\$(000)	54,000	+16,468
	FTE	11	0

The FY 2005 budget request for the NAWCA program is \$54,000,000 and 11 FTE, a net program increase of \$16,468,000 and 0 FTE from the 2004 enacted level. Other resources available for accomplishing the major performance goals supported by these appropriated funds include fines and forfeitures to the Migratory Bird Treaty Act (estimated \$500,000), partner matching-funds from grant commitments (\$204 million in 2003) and funds from other receipt accounts (\$23,856,000 in 2003).

The Service is requesting an additional \$16,468,000 to provide additional funds, and to leverage greater partner support, for the restoration and conservation of important migratory bird habitats. The requested increase combined with the other dedicated funds is expected to be matched by at least \$341 million of partner's funds (see Program Performance Summary table below). This high amount of anticipated partner funds reflects the higher matching fund ratios generated by the Small Grants program coupled with the higher leverage experienced in recent years.

This aggregate funding will support projects that contribute not only to conservation, but to local economies through jobs and migratory bird-related recreation. This increase will also enable the Service to expand international commitments for migratory bird conservation in the United States, Mexico, and Canada. As a result of the requested increase, the Service expects to protect and restore at least 1.3 million additional acres of valuable migratory bird habitat across Canada, Mexico, and the United States thereby creating additional habitat conditions for biological communities to flourish (DOI Strategic Goal: Resource Protection).

In addition to providing financial support to private and public partners, the \$16.47 million increase will further the Service's success in conserving and assisting with fulfilling the population and habitat objectives of existing bird conservation plans such as the North American Waterfowl Management Plan, Partners in Flight, the North American Waterbird Conservation Plan, U.S. Shorebird Plan, and the priorities of the North American Bird Conservation Initiative. Through NAWCA, the Service will be able to leverage approximately \$68 million more in partner contributions with the \$16.47 million requested increase to protect, restore, and enhance an additional 279,195 acres of wetland, upland, and riparian habitat. This work will be accomplished through an additional 24 (approximately) grant-supported projects through voluntary stewardship and partnerships.

The NAWCA program has supported over 2,200 partners who voluntarily restored fish and wildlife habitat on their lands, lands that emphasize critical habitats for migratory birds. Through this program NAWCA partners have increased habitat benefits to fish and wildlife populations on over 13.7 million acres of land across the U.S., Canada, and Mexico. The program continues to be well received by a diverse set of partners, and has accomplished significant on-the-ground habitat restoration in wetland ecosystems, including working landscapes (agricultural and silvicultural lands).

Program Performance Summary

This program supports DOI Resource Protection Mission – Outcome Goal 2, which aimed at sustaining biological communities on DOI managed and influenced lands and waters (Strategy 1- Create habitat conditions for biological communities to flourish).

FY 2003 – 2005 Estimated Program Accomplishments on Approved Grants for Partners			
Fiscal Year	2003 Grant Commitments	2004 (Estimated)	2005 (Estimated)
Appropriations	\$38.3 million	\$37.5 million	\$54.0 million
Total Federal Funding Level ^a	\$62.7 million	\$63.9 million	\$79.9 million
Partner Contribution	\$204 million	\$273 million	\$341 million
Ratio of NAWCF to Partner Funds	1:3.15	1:4.3	1:4.3
Acres to be Protected, Enhanced or Restored ^b	1,538,955 ^c	1,087,441 ^d	1,366,636 ^e
Number of Projects	125	131	155

^a Includes NAWCA appropriations, Federal Aid in Wildlife Restoration interest, Sport Fish Restoration funds, and *Migratory Bird Treaty Act* fines (96 percent of funds are available for grants and 4 percent of funds are available for administration).

^b Data reflects grant commitment acres to be protected/restored according to grant agreements using that fiscal year's funds (03, 04, 05); comparisons of this table with the Program Performance Summary table below is inappropriate since the latter table presents "actual" performance data derived from completed project final reports received in each fiscal year, reflecting funding from several preceding fiscal years (projects take 2-4 years to implement and complete); acres are not proportionally consistent due to the voluntary nature of partner proposals, which vary year-to-year.

^c Data for FY 2003 acres is based on grants approved by Migratory Bird Conservation Commission; individual grant performance takes 2-4 years to implement (see "Typical NAWCA Grants Administration" graphic in an earlier section of this document.)

^d This number is the result of two estimates: (1) Standard Grant Estimate Based on Proposal Data: a calculated ratio of the Total Federal Funding (NAWCF) anticipated for FY2004, MINUS (-) \$2 million (for yet-to-be-approved FY 2004 small grants) DIVIDED BY the total NAWCF requested in approved and selected grants to date (1.44), MULTIPLIED BY (x) the total number of acres proposed by those grants selected and approved to date in FY 2004; PLUS (+) (2) Small Grant Estimate Proposal Data: sum of FY 2003 approved grant acres.

^e This estimate is based on the FY 2004 estimate with necessary adjustments using the estimated FY 2005 Total Federal Funds (NAWCF) and DIVIDING BY the FY 2004 Total Federal Funds requested.

Standard Form 300

DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
NORTH AMERICAN WETLANDS CONSERVATION FUND

Program and Financing (in thousands of dollars)

Identification code 14-5241-0-2-303	2003 Actual	2004 Estimate	2005 Estimate
Unavailable Collections (in thousands of dollars)			
01.99 Balance, start of year	0	0	0
Receipts:			
02.00 Fines, penalties, and forfeitures from Migratory Bird Treaty Act	447	500	500
Appropriations:			
05.00 North American Wetlands Conservation Fund (-)	-447	-500	-500
07.99 Balance, end of year	0	0	0

Obligations by Program Activity:			
00.01 Wetlands conservation projects - Title I			
00.02 Administration - Title I			
00.03 Wetlands conservation projects - Title 1 LWCF	64,138	36,779	53,864
00.04 Administration - Title I LWCF	1,436	1,501	2,160
00.05 Wetlands conservation projects - Title VIII LWCF	140	140	42
00.06 Administration - Title VIII LWCF	407	150	31
10.00 Total obligations	66,121	38,570	56,098
Budgetary Resources Available for Obligation:			
21.40 Unobligated balance available, start of year	33,041	6,510	5,972
22.00 New budget authority (gross)	38,756	38,032	54,500
22.10 Resources available from recoveries of prior year obligations	834		
23.90 Total budgetary resources available for obligation	72,631	44,542	60,472
23.95 Total new obligations	-66,121	-38,570	-56,098
24.40 Unobligated balance carried forward, end of year	6,510	5,972	4,374
New Budget Authority (gross), detail:			
Current:			
40.00 Appropriation (total discretionary)	38,309	37,532	54,000
Permanent:			
60.20 Special fund (indefinite)	447	500	500
70.00 Total new budget authority (gross)	38,756	38,032	54,500
Change in Unpaid Obligations:			
72.40 Obligated balance, start of year	39,692	78,613	78,027
73.10 Total new obligations	66,121	38,570	56,098
73.20 Total outlays, gross (-)	-26,366	-39,157	-49,600
73.45 Recoveries of prior year obligations	-834		
74.40 Obligated balance, end of year	78,613	78,027	84,525

Standard Form 300

DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
NORTH AMERICAN WETLANDS CONSERVATION FUND

Program and Financing (in thousands of dollars)

Identification code 14-5241-0-2-303	2003 Actual	2004 Estimate	2005 Estimate
<u>Outlays, (gross) detail:</u>			
86.90 Outlays from new discretionary authority	0	26,272	37,800
86.93 Outlays from discretionary balances	26,078	12,400	11,300
86.97 Outlays from new mandatory authority	0	350	350
86.98 Outlays from mandatory balances	288	134	150
87.00 Total outlays (gross)	26,366	39,157	49,600
<u>Net Budget Authority and Outlays:</u>			
89.00 Budget authority	38,756	38,032	54,500
90.00 Outlays	26,366	39,157	49,600

<u>Direct Obligations:</u>			
11.1 Full-time permanent	1,113	754	765
11.3 Other than full-time permanent	25	17	17
11.5 Other personnel compensation	4	3	3
11.9 Total personnel compensation	1,142	774	785
12.1 Civilian personnel benefits	256	174	176
21.0 Travel and transportation of people	112	114	115
23.2 Rental payment to others	1	0	0
23.3 Communications, utilities, and miscellaneous charges	7	7	7
24.0 Printing and reproduction	10	10	10
25.2 Other services	290	294	299
25.3 Purchase of goods and services from Gov't accounts	170	173	175
25.7 Operation and maintenance of equipment	17	17	18
26.0 Supplies and materials	23	23	24
31.0 Equipment	95	96	98
32.0 Land and structures	185	188	191
41.0 Grants, subsidies, and contributions	63,814	36,700	54,200
99.9 Total obligations	66,122	38,570	56,098

Standard Form 300

DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
NORTH AMERICAN WETLANDS CONSERVATION FUND

Personnel Summary

Identification code 14-5241-0-2-303	2003 Actual	2004 Estimate	2005 Estimate
Direct:			
Total compensable workyears:			
Full-time equivalent employment	17	11	11
Average salary per FTE	67,176	70,364	71,364