

FY18 Restoration Budget (9/8/17 discussion)

Funding levels include NFTM, NFVW, NFWF, WFHF, CMRD, Supplemental Fuels, Joint Chiefs, CFLN, CFLN Supplemental and any supplemental funds for NFTM. Regional trust funds are SSSS, CWK2, and TPPS.

	FY16 final	FY17 final	FY18 proposed
WO funding	\$153,400,000	\$162,100,000	\$142,200,000
Regional trust funds planned	\$9,304,000	\$7,700,000	\$9,000,000
Total funding	\$162,700,000	\$169,800,000	\$151,200,000

With the proposed level of funding, we won't be able to maintain our level of timber volume outputs, much less increase the amount – we would produce less than 600 mmbf. Several forests would be below a viable program level and the region would need to make some serious shifts in where we are offering timber sales. The specific results of this and the expected output is not known at this time.

In FY18, we can produce 625 mmbf of timber without negatively affecting our outyear program. This requires a total of \$168,900,000. The shortfall from the proposed funding level is \$17.7 million. The sustained level of hazardous fuel treatments is 235,000 acres.

If we plan to impact FY19, we could produce 675 mmbf for a total of \$174,400,000. We could increase our CWK2 funds by \$1 million so we are using a total of \$10 million in trust funds. The shortfall in this scenario is \$22.2 million. The impacts of doing include using our shelf stock with limited ability to replace it in time to maintain the output in FY19. There would also very limited CWK2 funding available in FY19.

We are planning to maintain a balance program of work. We have worked diligently to develop good partnerships with our collaborative groups. Much of the support we receive is based on us delivering the balanced program. If we shift our focus too much to timber volume, we will lose their support. That will ultimately impact our ability to accomplish anything.

While we are successful in implementing the mechanical treatment portions of our projects, we have fallen behind in the remainder of the work, including prescribed fire. Our ability to complete or maintain the treatments through prescribed fire are limited by our burn windows and the capacity to accomplish treatments during them.

FY18-20 Restoration and Biomass Capability Assessment Pacific Northwest Region

The approach to restoration in the Pacific Northwest Region is an integrated one, thus our response addresses a full suite of restoration activities, including forest products production.

Beginning in 2011, the Region made a purposeful decision to focus restoration effort (staffing, investment) on the eastside of Oregon and Washington where the threat of uncharacteristic wildfire to communities and resources is the greatest. The goal is to treat acres to reduce the threat of uncharacteristic fire by planning and implementing treatments, with a fuels focus, across very large landscapes. Implementation of the planning projects are treating significant acres as well as producing appreciable volume of timber. Eastside restoration will continue to be an emphasis through FY20 and beyond.

What will it take for your Region to accomplish more—to reach an agency goal of 3.4 billion board feet in FY18 and develop a glide path toward 4.0 in 2020 while accomplishing other natural resource outcomes we are responsible for?

In order to accomplish a steady, or increasing, restoration program, the region needs 3 things:

- Reliable funding level. In FY17, the region received about \$143 million for restoration (NFTM, NFVW, NFWF, WFHF, SSSS, CWK2, CFLN, TPPS) which is expected to produce 610 mmbf of timber, 733 miles of stream restored, 96 miles of road decommissioned, 235,000 acres of fuels treated, and 650,000 acres treated for resiliency. This funding level included supplemental funds for timber production and hazardous fuels treatments. In order to increase our program over the next several years, we would need an increase (beyond the FY17 level) of \$15 million in restoration funding to support the additional planning, prep, and admin of this work. This would allow R6 to increase timber volume output to about 750 mmbf in FY20 and 820 mmbf in FY22 and beyond. This funding level assumes we would continue to fully utilize regional salvage fund, timber sale pipeline, and spend out our CWK2 funds in FY19. It also assumes that CFLN funds are not available starting in FY20.

The roads allocation in CMRD has decreased substantially over the last 10 years and is not adequate to support the needs related to timber sales as well as our general road maintenance needs. To support the outputs above, additional funding is needed in order to meet the needs, from an additional \$3.5 million in FY18 to \$6.0 million in FY20 and \$8.0 million in FY22. If the additional roads funding is not provided, the region will either have to reduce the amount of vegetation treatments or direct almost all of the CMRD funds received to support the timber program. This would mean that most of the road maintenance accomplished in the region on roads not used for timber sales would not be maintained.

- Time to complete additional planning. Very few of the forests have adequate NEPA shelf stock (R6 moved many projects forward in 2012 in response to the Chief's call to accelerate pace and scale and did not have subsequent capacity to 'make up' shelf stock) so there is very limited ability to increase our outputs in FY18. If we were to implement the projects with approved decisions (and planned for implementation in FY19 or FY20), in FY18, additional funding to prep those sales would require redirection from other programs.

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Additionally, without investment in NEPA in FY18 to replace the projects moved forward, there would be a diminishment in outputs in FY19 and FY20. The additional funding identified above would be targeted to complete NEPA and then prep activities on specific forests to increase the regional outputs.

Ability to fill critical vacancies. The Region participated in hiring surges in early FY17 in anticipation of the hiring freeze and so was buffered, to some extent, in program of work delivery in FY17. As vacancies accumulate ability to deliver program in FY18 is diminished. Alternative sources of capacity through development of GNA instruments with both OR and WA will buffer some but not anticipated capacity gaps. The state of WA legislature's recent failure to pass a capital budget has resulted in a significant budget gap for the WA DNR (\$15MM). Effect on joint capacity to implement proposed GNA work is uncertain at this time.

What changes in business practices does the region expect to make?

Continue to use Stewardship Contracting to deliver about half the Region's POW. We began using the stewardship authority during the pilot phase in the late 90's and have continued to utilize that authority. Our overall timber program is about 45% stewardship sales and 55% traditional timber sales. We expect to continue to have at least this amount of stewardship sales, if not see an increase. Stewardship receipts play a key role in delivering non-veg integrated outputs.

Bolster use of contemporary practices and technologies in delivering forest products POW. Some units began using Designation by Prescription as it became available. While some forests utilize almost exclusively DxP, others are not. We will continue to encourage forests to utilize this (as well as DxD) where appropriate. We will evaluate why some units are not using and enlist the help of those forests that are successfully using it. We will continue to explore the use of technologies for location of boundaries as well as tree selection, weight scaling, and other new methods. We will encourage the use of these where they are appropriate.

Capitalize on learning from eastside pilot projects. Several years ago we began the Mill Creek A to Z project on the Colville NF as part of the Region's Eastside Restoration strategy. This particular project was a pilot to include NEPA in the stewardship contract. That contract is well into implementation with the 2nd EIS complete and the ROD due to be signed in the next couple of weeks. We want to continue with this model where it makes sense (likely eastern WA) and where there is ongoing interest from industry, state government, and tribes.

Examine and implement NEPA efficiencies. RO NEPA staff will focus their efforts to increase our planning efficiencies through NEPA at Forest or larger scales, updating LSR assessments across the Region, and creating additional templates to streamline specialist reports.

Very limited expertise in NEPA on some forests require direct project support. This will include training and support to expand understanding of how broadly we can use CEs and how to differentiate between an EA and EIS, and understanding of what needs to be in an EA.

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We are working with the SHPOs in both states to develop MOU's to develop programmatic consultation practices and allow for phased compliance procedures (post decision NHPA Section 106 review process, including surveys).

The Region has been acquiring LiDAR data and has good coverage for many areas (upwards of 60% of units). We continue to evolve our knowledge of how to best utilize this information in the planning process to improve our work. We will continue to invest in acquisition of the data as well as the field plots necessary to fully utilize it.

Use of all available funds. Continue revision of regional budget process that require Forests to develop an integrated program of work and fully utilize all funding sources available including full use of permanent and trust funds. On average, one-third of our WFHF funding is used to for projects that produce timber.

Describe any barriers you see, beyond just total funding levels?

ESA consultation. This continues to be an area where greater efficiency is sought. Plans to address these challenges include exploration and development of additional programmatic consultation tools. The Region also plans to explore use of ESA section 7(a)1 in order to streamline the section 7(a)2 process that at present is very time consuming. Other barriers related to ESA include staffing capacity of the consulting agencies, which are simply not positioned well for an accelerated workload. There are examples in other Regions where FS support for additional NOAA and FWS staffing have helped expedite the consultation process. We plan to discuss and explore such options with the FWS and NOAA.

Planning NEPA shelf stock. Most units have shelf stock for non-timber related work (including substantial thinning for hazardous fuels reduction) but do not have shelf stock for projects that produce timber volume. If the region receives additional funding, we will target that funding to specific forests (up to 4 forests for 1 to 2 years beginning on the westside) to increase the amount acres covered under signed decisions in order to implement a larger program.

Many of the line officers are not engaged in the NEPA process at the right time and do not know how to assess risks associated with their projects. Some training for line officers so they clearly understand their responsibilities will provide some assistance in overcoming this barrier.

Lack of critical staffing and lack of needed skills. Most forests are facing broad staffing shortages due to vacancies. The level of vacancies is higher than the normal due to the hiring freeze. Many positions are on the current exemption request but not all of them. If we are not able to fill these positions, some forests will quickly drop below the level of staffing required to maintain program viability. Of particular concern are adequate personnel to manage contracts and agreements, particularly as we project using more of those instruments to help with capacity.

In addition to limited staffing, where forests have staffing, those employees increasingly have more limited experience in their specialty. There is limited opportunity for mentoring of new employees to assist them in learning the nuances of their jobs.

Limitations on treatments associated with the NWFP. There continues to be public controversy surrounding active management of forested stands over 80 years old in the Northwest Forest Plan

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area. In addition, there are survey requirements that can take several years to complete. This makes projects outside of the plantations complex and expensive to complete.

Lack of markets for material from the forests. Most areas of the region have sufficient capacity for commercial timber but there is very limited market for the small diameter trees and slash. In some areas, the capacity for all material is limited by the private sector workforce. Mills cannot retain a workforce to increase beyond one shift and logging companies find it difficult to hire and retain skilled employees. While the workforce is not an issue now, it could become a barrier if we substantially increase outputs.

How can the WO help facilitate your efforts to achieve additional outputs? What additional flexibilities in policy are needed in order to be successful?

National initiatives/competitive projects. Honor the commitments for the CFLR projects and Joint Chief's projects. For any national competitive projects, conduct the competition at least a year ahead so regions know in the spring/early summer what projects are likely to be funded in the next the fiscal cycle. This allows the region and forests to plan their program of work more completely in advance.

NEPA. Additional WO guidance on both conditional NEPA and "big gulp NEPA" covering a variety of restoration actions could help reduce planning costs and increase consistency in project analysis and planning. Develop and offer Line officer training in risk as well as line officer involvement in NEPA. Best way to get good NEPA is with effective involvement of well-trained line officers.

Funding an enterprise team to provide specialist support as needed on IDTs. This could help reduce the high costs of bringing on additional support to short staffed IDT's on Forests. Even if the WO funded the overhead rate, the forests would be able to cover base salary and travel.

Multi year budget. The agency should start budgeting on a multi-year (e.g. 3-year) cycle at all levels of the organization and make adjustments to planned budgets only as needed to adapt to Congressional appropriations. This will reduce the time and effort spent on budget and provide greater certainty to Units, so that they can plan accordingly.

Loosen the restrictions on the use of funds.

- Suspend or substantially reduce the assessment on SSSS and make those funds available at the regional level for additional NEPA or prep. This would also require a change in policy for the use of the funding (definition of salvage).
- Allow the use of KV outside of the sale area boundary. The law allows the funds to be used anywhere in the region and this would allow more flexibility and use of the funds.
- Allow a portion of KV to be used for planning would be beneficial for local units as well, again keeping receipts on the Forest where they were collected. Allow the use of KV for project surveys.
- Allow use of some portion (10%?) of retained receipts for Forest Service salary. This would increase the ability to plan and prepare projects to complete restoration work.

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Policy changes. There are a number of efforts ongoing at the national level including modernizing the forest products program and improving NEPA. These won't necessarily have a short term impact but should have a long term impact on our program. In addition to the information identified by those teams, here are some additional ideas

- Roads
 - Utilize more single use roads instead of trying to design/maintain for all uses.
 - Utilize the PEPE funds that are in the WO from past overhead assessments. If the funds cannot be provided to the regions for use on roads, have personnel in the WO charge to PEPE since it was collected for overhead. This would allow discretionary funds (CMRD or NFTM) to be sent to the regions.
 - Allow the use of temporary specified roads where they are needed. This would provide needed environmental protections as well as provide the ability to compensate the purchaser for any changes that might be required.
- Stewardship
 - Allow the use of retained receipts on instruments other than stewardship. Right now the interpretation is that those cannot be used on other instruments (such as Good Neighbor Agreements). With the current direction, we may have several instruments for the same project because of the BLI used. This is very confusing to our partners as well as our employees.
 - Include planning as an appropriate activity in stewardship projects.
- Easements: allow the expenditure of our funds on the acquisition of temporary and restricted use easements. The current policy is that we only expend appropriated funds on permanent, non-restricted easements. Most landowners these days are not willing to do this but are willing to grant us a temporary easement or a restricted use one. We need to have the flexibility to utilize this option when the preferred option (permanent, non-restricted) isn't available.

Legislative remedies. Encourage congressional changes to support rural counties. This could be permanent authorization of a payment system that is not tied to receipts such as Secure Rural Schools. This would provide stability to the counties and generate more support for implementation of projects utilizing authorities that do not contribute to county payments (if we are utilizing the 25 Percent Fund Act). Having additional support for instruments such as Stewardship and Good Neighbor Authority would result in more non-commercial restoration work being implemented. If a permanent change isn't implemented, support a change in the Stewardship Act language allow those receipts to be counted when calculating county receipts.

What additional acquisition/grants & agreements support would be helpful?

An increase in the regional program will likely result in more AQM contracts (service and IRSC) and agreements (GNA, stewardship, partnership) being issued. Our workforce is stretched with the current level of work and an increase in the number and complexity of these instruments will require an additional 4 to 5 personnel in the region. This work requires highly skilled and experienced team leaders (GS-12 or GS-13) with admin support. It will also require dedicated personnel on the program side as well.

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What options can you deploy for addressing capacity outside of hiring additional permanent staff?

Good Neighbor Agreements. We are developing a statewide agreement with Washington Department of Natural Resources for sale prep activities. This work includes traditional timber work (marking, cruising) as well as completion of road packages by state engineers. We will explore expanding this to include other services. A similar agreement with Oregon Department of Forestry will be explored, potentially on a zone basis to make the administration of it more reasonable than the whole state. These agreements will provide additional capacity to the forests for accomplishing work as well as providing stability to the state organizations.

Use of contracting. The Region has IDIQ contracts for many activities, including professional services, NEPA, and thinning. We have not used contracting for professional services or NEPA very often but these will provide us with additional options for increasing our capacity. The contracts are also a good way to acquire skilled personnel for specific projects or to provide mentoring and training to our inexperienced personnel.

Regional crews. There are options to create regional (or inter-regional) crews for survey work, sale prep, and other activities that can be used to concentrate the work on specific units in conjunction with project planning. The crews could be led by permanent personnel and staffed mostly with temporary employees.

Utilizing tribal employees. The region has many tribes with a wealth of experience. Through the use of agreements, TFPA, and contracts, we can utilize their employees to assist with our work.

How can your partners help achieve these goals? What is your strategy for public engagement and communication to explain the reason for this work? Is there support you need from the Washington Office to help with this, e.g. support for collaboration, communication tools, etc.?

Our partners are critical to accomplishing our restoration program. Many of the organizations provide funding and/or labor that we leverage to accomplish non-timber related accomplishments. All of our forests have one or more collaborative organizations they work with on all phases of projects. Without the support from these collaborative groups, we would have a much harder time implementing our restoration activities, especially the vegetation management projects. The relationships that we have developed require time to maintain (and develop new ones). It is critical that we include that time in our overall project timelines and don't move too fast or too far outside the areas of agreement or we run the risk of damaging these relationships.

We are seeing a change in tenor within the conservation community and how they work with us. They are supportive of restoration in general but we lose that support if we do not maintain our collaborative efforts. In order to help address that, consider developing a Regional collaborative or Regional FACA committee to bring people of varying interests to come to agreement on a Regional program of work on restoration and salvage.

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Assume your region will get the same total level of base discretionary funding received in FY17, except that the supplemental funds received for timber volume in previous years will not be available). Describe how your region will shift use of discretionary funds (e.g. how WFHF, NFRR, NFWW, NFWF, NFTM are used) and leverage other funds sources including permanent and trust funds, retained receipts, stewardship and GNA funding?

What major shifts in work do you expect to occur in your Region to achieve these priorities, i.e. what work will no longer be possible? What steps are you taking/will you take to ensure employees have reasonable workloads and can communicate pinch points when they occur? Are there things the WO can do to help with this?

The region instituted a budget process in FY17 that builds the program of work and budget from the ground up, utilizing all funding sources available and guided by broad regional priorities as established by the Regional Forester. This process allows the Forest Supervisors to determine their program of work based on their local capability, needs, and opportunities. Most forests are maintaining a balance of programs to address public demands on their National Forests. The forests work with a variety of collaboratives, special interest groups, and other members of the public, all of whom have desires on what the forest produces. The Forest Supervisors have to balance their program of work with these desires. Many of the relationships are based on delivering a full suite of restoration activities, not just timber volume. If we were to shift a large portion of our programs away from this other work to timber, we would likely erode the relationships and trust that has been built. Many of the units use stewardship receipts to implement many of these types of projects as well as partner funds so our investment in them from appropriated funds is already limited. Much of our appropriated funds goes to planning since we can often utilize other funding for the implementation.

The forests have been using GNA agreements in Oregon for about a year and in Washington for a few months. We are still exploring the capacity extent of the states for this type of work so do not know if the work under the agreement will substantially increase our outputs or help maintain existing levels. We are also beginning to explore the ability of our tribes to take on some work and there might be the opportunity to base a portion of an increase on agreements with them.

The Oregon legislature invests in federal forests through the Federal Forest Restoration Program. This funding is used to fund Oregon Dept of Forestry employees and collaboratives who work with the forests. Additionally, there is funding available to the forests for implementation work. To date this has generally helped backfill gaps with Forest Service capacity. As we continue to work with this program, we will be better able to resolve the impact of these funds.

Considering your total suite of funds, identify outputs you would capture as part of this work:

The accomplishments shown in the table below assume a budget as described in the instructions (FY17 without any supplemental funds). This results in \$10 million less than the FY17 level. This includes the expected use of salvage and timber sale pipeline in all years and CWK2 in FY18 and FY19. After that, the region does not expect to have those excess funds. Volume from Mill Creek A to Z project is completely awarded in FY19. This volume, which is available

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at a very low cost due to the nature of the contract, helps buffer the reductions based on budget in FY18 and FY19. Part of the decline in FY20 is based on a reduced level of perms and trust funds available as units spend down their balances. The remainder of the reduction in FY20 (50 mmbf) is due to the expiration of the CFLR program and no longer receiving the additional funds. The other accomplishments noted do not have as substantial of a decline because much of that work is completed through partnerships.

Fiscal year	Acres treated for resiliency	Watersheds improved	Total Fuels treated	Timber volume (MMBF)	Other outputs to note (road miles, habitat, invasives, etc)
FY18	600,000	7	223,000	590	60 miles decommissioned 18 Aquatic Organism Passage barriers removed or replaced to standard 700 miles of stream restored
FY19	594,000	7	215,000	580	55 miles decommissioned 18 Aquatic Organism Passage barriers removed or replaced to standard 700 miles of stream restored
FY20	528,000	7	211,000	480	40 miles decommissioned 15 Aquatic Organism Passage barriers removed or replaced to standard 650 miles of stream restored

If the Region receives the additional funds identified in the first section, the following outputs would be expected (funds would need to be available at the beginning of the fiscal year to assure

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delivery of outputs). The outputs for FY19 and FY20 are rough estimates. Additional funds could be covered if the salvage sale assessment was suspended. Based on the last several years, this would result in about \$12 million being available to the PNW Region.

Fiscal year	Acres treated for resiliency	Watersheds improved	Total Fuels treated	Timber volume (MMBF)	Other outputs to note (road miles, habitat, invasives, etc)
FY18	740,000	7	240,000	675	96 miles decommissioned 18 Aquatic Organism Passage barriers removed or replaced to standard 730 miles of stream restored
FY19	800,000	7	270,000	725	100 miles decommissioned 18 Aquatic Organism Passage barriers removed or replaced to standard 750 miles of stream restored
FY20	825,000	9	290,000	750	100 miles decommissioned 20 Aquatic Organism Passage barriers removed or replaced to standard 750 miles of stream restored

Increasing restoration

The Chief has laid out some specific challenges and expectations to increase our restoration activities over the next several years. The agency needs to increase its responsiveness to public demands and requests. Specifically The Chief and Secretary are aligned in the need for the agency to increase our restoration activities in order to produce 3.4 billion BF of timber in FY18. This would climb to 4.0 billion BF in three years (FY2020). This is not just about increasing timber volume sold, it's about increasing our overall restoration treatments.

It's not about doing more with less. It's about modifying our business practices to do more with more funding but without a substantially increased workforce. It's about line officers assessing the risk on their projects and making determinations on what is "good enough".

Some changes units need to explore are:

- Working in larger landscapes
 - Forests working together and across boundaries
 - Improving our outcomes by expanding treatments across and in concert with other units (FS) jurisdictions (state, private, tribal)
- Changing the way we approach NEPA –
 - Use contracts, enterprise teams, states, tribes to completely do the analysis or supplement our ID teams
 - Only do the survey and analysis necessary – don't need to be bulletproof
 - Conduct programmatic or batched consultation for ESA and SHPO
- Utilize all authorities
 - Increase the use of stewardship contracting where the value of timber can help us meet additional restoration needs.
 - Increase the use Good Neighbor Authority where the states have the capacity and interest.
 - Increase our work with tribes through TFPA and other avenues to help meet our goals.
- Increase our efficiency in implementation
 - Implement the actions that some forests have been trying such as virtual boundaries
 - Less tree marking, more weight scaling
 - States and tribes doing the implementation for us, including contract admin
 - Ensure our silvicultural prescriptions are not more complicated than needed to meet desired conditions
- Fully utilizing perms and trusts
 - Use timber pipeline to the fullest extent possible on the sales that are expected to be able to pay it back
 - Unit leads will be accountable for spending the annual authority in trust funds like they are with discretionary funds

The region will be preparing a plan to describe what we can contribute to the national goals, in terms of multiple restoration objectives

- Acres treated
- Watersheds moved to an improved condition class
- Stream habitat miles improved
- Road miles decommissioned
- Timber volume sold
- Aquatic organism passages improved

This plan will also include a description of the additional resources needed (funding and personnel) as well as the changes in business practices we will implement.

Units (forest, grassland, scenic area) need to look at their program and develop a reasonable assessment of what they can contribute, what they need, and what changes they are planning on implementing. When considering increases in commercial timber activity, take into account your industry capacity. Also consider your ability to increase given other large regional priorities such as Forest Plan Revision and Travel management.

Later this year all units will be required to submit a 5-year integrated restoration plan. This plan should include all restoration activities, include planning and implementation. More details of what this entails will be shared in the next couple of weeks.

We recognize that this increase may change the information submitted for the FY18 budget capability data call. We will discuss the adjustments needed either during the Q&A sessions with the forests or at another time before we develop the operating budget.

As we continue to work through this, there will be line to line calls to review plans, approaches, and commitments.

Caveats:

- Do not expect a substantially larger workforce – assume we'll fill most of the existing vacancies
- Expect some additional funding, amount is unknown but not likely to be 'enough' to match unit rate expectations.
- This is an evolving concept/plan and things will continue to change. We need to remain flexible.

FY18 National Output Plan

Region 6

Updated on 11/07/2017

FY18 Regional planned accomplishment Level

Reporting Period	Acres treated to reduce wildfire risk	Timber Volume Sold
Quarter 1	15000 acres (5%)	152 MMBF (23%)
Quarter 2	30000 acres (10%)	59 MMBF (9%)
Quarter 3	80000 acres (27%)	172 MMBF (26%)
Quarter 4	100000 acres (34%)	120 MMBF (18%)
Remaining (likely Q4)	72000 acres (24%)	157MMBF (24%)
Totals:	297,000 acres	660 MMBF

Planned level of use for Permanent Allocations & Trust Funds at the Regional level in FY18

The region is planning on using approximately \$28 million in permanent allocations and trust funds in the delivery of our restoration plan in FY18. This includes the forest funds as well as regional level funds. All of the units are preparing plans for their trust funds and will identify a sustainable level of funding for them to maintain. Once those are complete, we may adjust this number.

Using these plans, and the annual balance reports for salvage, KV, brush disposal, and retained receipts to be completed this fall, we will determine if there are surplus funds in any of these accounts that can be directed to other units. Priorities for surplus funds will be post-fire restoration (there is a need of over \$20 million from the FY17 fires) and planning for outyears to help forests build additional shelf stock in NEPA for timber removal.

Use of Good Neighbor Authority

Master agreements are in place with both Oregon (Oregon Department of Forestry and Oregon Department of Fish and Wildlife) and Washington (Department of Natural Resources).

In Washington, the region has a statewide agreement with DNR to provide sale preparation activities on any of the forests. In addition, 2 forests will execute on Supplemental Project Agreements for preparation and timber sale activities. There is a timber sale planned for the 3rd quarter of FY18 for approximately 5 mmbf of timber.

In Oregon, there is a statewide agreement to provide project liaisons (ODF field foresters) to work with the forests, collaborative, and other agencies to develop partnership projects. The Federal Forest Working Group (a group convened by the Governor of Oregon) is leading discussions on how GNA develops in Oregon. The FFWG is comprised of ODF, industry representatives, members of collaboratives, federal agencies, and environmental groups. There are several models being considered. The next FFWG meeting is on November 9 in Portland. Supplemental Project Agreements with either ODF or ODFW are in place across units in Oregon. Activities include sale preparation, professional

services, and restoration services and sale of timber (FY17). Both ODF and the Forest Service are moving into the timber sale arena and with more sales either late in FY18 or in FY19.

Forest Products system modernization

The region will be reviewing all of the R6 forest management related direction (manual, handbook, user guides, letters) this winter to determine what should be retained, eliminated, or changed. The goal is to have direction that provides the maximum flexibility to line officers to ensure that the effort expended on an activity is commensurate with the value or benefit of the activity.

A two hour RLT engagement was held the week of November 6th. Forest NR Staff Officers will be engaged the week of November 13th. Engagements with each Forest are planned for the winter and early spring and will be coordinated with those for Environmental Analysis and Decision Making.

Primary Cross-boundary partners contributions and accomplishments

Numerous. Of note are 5 CFLR projects, 4 Joint Chiefs projects, and a focused, multi-year regional investment strategy (initiated in 2012) on the eastside of OR and WA (Eastside Restoration team, A to Z, etc.) that has resulted in completion of multiple, large landscape NEPA decisions (> 800,000 acres) to enable implementation of landscape restoration, aimed at fire resiliency, at scale.

Staffing & Capacity

- Contribute to a national assessment of training needs related to forest management and wildfire risk analysis.
 - Use the results to set training schedule and/or update design additional treatment and develop wildfire risk assessments
- Identify specific list of target positions to fill through a series of planned career development positions.
- Accumulation of vacancies is a serious limitation in program execution.

Five Year Plan

In development. R6 RO just received three year restoration plans from each unit (based on a flat budget). Will take more time to parse outputs from extant, large scale NEPA and pending NEPA to out year timeframe of increasing timber volume sold.

Timber Program Potentials

Prepared by Aly Warren, R6 Timber Program Manager, June 2017

Current limiting factors for timber production are staffing, availability of signed NEPA decisions, and funding. The hiring freeze is impacting the ability to prepare outyear projects, and will likely have a significant impact on timber volume sold accomplishments if extended.

“Moderate” timber program potential volumes shown in the table below could be achieved by Forests within a few years with commensurate increased funding and the ability to ramp up staffing and NEPA as needed. “High” values would require additional investments, as well as discussions with Forest leadership about priorities and program emphases. “High” values for the Blues Forests are based on Alternative E-Modified Timber Sale Planned Quantities (TSPQ) from the Draft Forest Plan; actual values would be subject to the selected alternative in the Record of Decision.

	FY17 Target (MMBF)	Timber Program Potential (MMBF)		Notes
		Moderate	High	
DES	52	45	50	Plan to reduce output due to lack of shelf stock and increased acres needed to produce volume
FWI	76	85		
GIP	31	40	65	Have 3 year plan to achieve PSQ of 65MMBF with significant increase in staffing
MAL	75	75	84*	Draft Forest Plan TSPQ ranges 56-134MMBF
MBS	16	20		Need additional staffing
MTH	30	35		
OCH	14	18		
OLY	23	30		Need additional staffing
RRS	31	40		
SIU	39	40		
UMA	30	30	56*	Draft Forest Plan TSPQ ranges 56-94MMBF
UMP	30	30		
WAW	30	30	65*	Draft Forest Plan TSPQ ranges 50-98MMBF
OWE	35	35	40	
WIL	75	100		Currently working on NEPA to provide 100MMBF program level by FY20
COL	59	60	62	Need additional IDT to have sustained 60MMBF program
Total	641	713	820	

* TSPQ value from DRAFT Forest Plan Alternative E-Modified

Timber Program Potentials

The Region is currently able to produce about 610 mmbf of timber with the funding and staffing available, including funding provided through Supplemental Hazardous Fuels. We can increase this to 710 mmbf in 3 years and about 770 mmbf in 5 years with an increase in funding and staffing.

In FY18, we are currently expecting to offer a program level similar to FY17 (assuming a flat budget), however we are still determining the impacts to the FY18 program from the hiring freeze which may lessen our volume potential. We could increase this to 675 by moving some projects forward (Mill Creek A to Z, G-P, Willamette). This would require an increase in funding in FY18 order for the region to substantially increase our NEPA analysis in order to maintain an increased program (or increase it further). The NEPA would be completed through a combination of force account (assuming increased staffing is approved), contract, and potentially GNA agreements with the states.

Our FY17 program includes utilizing approximately \$750,000 in timber pipeline funds. Available pipeline funding for FY18 will be approximately \$500,000, but is expected to increase to about \$2,000,000 per year beginning in FY19 as approved pipeline projects collect receipts. Pipeline funds can be used to complete NEPA and sale preparation, leading to increased program capacity. If we receive additional funds (that are excess in another region), we can utilize those funds on forests that have the timber value needed to increase our regional program. We could utilize an additional \$500,000 in FY18 which would help increase our program in FY20 and beyond as we would concentrate the funding on completing NEPA. As our approved pipeline projects generate receipts, we may have excess pipeline funds to provide to other regions.

Our CFLR projects are producing an average of 50 mmbf per year. If the targeted funding for those projects is not available in FY18 (or results in reductions to the non-CFLR targeted funding), we would not be able to maintain our current level of production, much less increase it. With the authority expiring in FY19, we are exploring options for continuing those projects. We likely will not be able to maintain a 610 mmbf program without the additional funding.

Current limiting factors for timber production are staffing, availability of projects with signed NEPA decisions, and funding. The hiring freeze has had a significant impact on staffing and the forests are focused on completing this year's program but short-staffed to prepare outyear sales. They cannot increase without being able to fill the vacant positions and add some new positions to handle the increased workload. Most forests do not have much NEPA shelf stock so could not increase their program until they are able to complete additional NEPA. While much of the work could be completed by contractors, FS personnel are still needed to provide the local information and administer the contracts.

BRIEFING PAPER

Pacific Northwest Region - Regional Office

Date: August 30, 2017

Issue: 2018 Allocation for Vegetation Management & Forest Products

Status: The scenario from WO has estimated targets for R6 at 745 mmbf of timber volume sold and 280,000 acres of fuels treatments in FY18. The capability assessment we provided stated we could produce 675 mmbf of timber and 240,000 acres of fuels treated. These were the levels we felt we could reasonably accomplish given our current workforce.

We can increase our timber output to 675 mmbf by moving sales that are through NEPA and planned for FY19 or FY20 forward to FY18. We do not have sufficient NEPA shelf stock to go beyond this. This strategy requires that we complete additional NEPA analysis and decisions in FY18 to maintain our outputs in FY19 and beyond. We are assessing the impact of the 2017 fires on our FY18 program. Our ability to meet 675 mmbf will depend on impacts to currently planned sales and the ability to salvage material. We have plenty of shelf stock for fuels treatments but do not have the burn windows to treat them with fire or the funding to use mechanical treatments.

The spreadsheet shows a national planning level of 3.7 mmbf to allow for 10% of the volume planned not being sold to still meeting a national target of 3.4 mmbf.

The increased outputs of both timber volume and fuels treatment acres require an increase in funding from FY17 unless there is a substantial decrease in other areas such as noxious weed, stream restoration, wildlife habitat improvement, etc. Based on our current workforce, our ability to make a major shift in one year is limited and the risk to collaborative relationships across units of such a shift is high.

The total funding level needed to accomplish 675 mmbf is \$137 million (not including CMRD). The region will use \$8.5 million in trust funds, leaving the WO allocation need at \$128 million. The WO scenario has this funding at \$110 million—an \$18 million gap

As stated in the capability assessment, the funding level for CMRD is not sufficient to meet the needs for roads associated with timber sales and the other needs. The minimum funding level needed for the increased timber output is \$23.6 million. The WO scenario has the funding at \$18 million, slightly below the FY17 level. The substitution of CMRD for timber sale support and Federal Highways funds for the remaining roads needs appears to be infeasible as Federal Highways funds may only be used on an approved subset of our roads and a pre-approved five year program of work is in place vetted by multiple director areas and coordinated with WO ENG and FHWA.

Under any scenario, increasing outputs requires funding available at the beginning of the fiscal year. Early funding maximizes our ability to complete prep work needed for additional sales and to complete NEPA to maintain the program for FY19 and beyond. If the funding availability is delayed beyond first quarter, our focus will be to increase the FY19 output with likely a more modest final output for FY18.



for the greatest good

BRIEFING PAPER
continued

Contacts:

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Region 6 – Timber Volume Sold Projection –Budget Capability Request 12/2015

In FY16, the Region absorbed a \$5.4M cost from multiple BLIs (NFTM, WFHF, NFVW, NFWF and CMRD) to fund the Accelerated Eastside Restoration effort, support for a 75MMBF timber program on the Malheur National Forest as well as a landscape-level NEPA planning team on the eastside of Oregon. In addition, we held \$630k NFTM off-the-top to stand up a Timber Sale Prep Team, a Regional resource similar to the Region 1 Strike Team that will increase implementation capacity. We are committed to funding these efforts as Regional priorities and methods for building the program, but absorbing the costs resulted in decreased funding to Forests and targeted reductions to Special Projects that fund on-the-ground accomplishments. Regional funding in many program areas was reduced by 7%, with the largest single cut being \$700k NFVW from the silviculture program, which will result in 1,680 acres less of FOR-VEG-IMP accomplishment.

Beyond these funding reductions taken in FY16, the level of appropriated funds for the timber program has not provided the unit rate of funding needed in the Region (\$100-120/MBF), and in FY15 we depended heavily on perms & trusts (SSSS and CWK2) to supplement appropriated dollars to deliver the program. This was a short-term fix, and we are not able to supplement appropriated funds at this high of a level. In FY16-18 we will reduce our use of perms & trusts to more closely match the level of collections, which would decrease the volume of timber produced if not replaced with appropriated funds. Region 6 has a need to “catch up” in building shelf stock in order to reduce the dependence on late 4th quarter sales and provide a more even flow of timber volume, and increasing the unit rate to match the actual cost of doing business will help us work toward that goal.

We are beginning to use the Timber Sale Pipeline Restoration Fund (TPPS) dollars transferred from Region 9 in FY16 as part of our strategy to rebuild shelf stock. We plan to allocate approximately \$1M of TPPS in FY16. We expect to begin to see volume outputs related to this funding in FY17 and FY18, but the real benefit of this funding will be realized through a more stable timber program into the future. This will help us be able to respond to requests to produce additional volume with additional funding. We will also be exploring designating additional Pipeline sales to continue to grow this funding source within the Region.

In FY16, the Region can produce 570-580MMBF with funding level flat to FY15 plus an additional \$3.2M to cover part of the Accelerated Eastside Restoration effort (NFTM=\$2.2M, WFHF=\$650k, CMRD=\$350k). This accomplishment includes approximately 30MMBF of holdover volume from FY15 that wasn't awarded in the 4th quarter, and assumes Perms & Trusts are fully restored from fire borrowing. We have little shelf stock available, but **for an additional \$2M the Region can produce an additional 20MMBF**. Half of this could qualify for the additional WFHF funds that are available, and will be submitted as a project proposal under this funding opportunity. An additional **\$400k CMRD would also be required** for this volume increase.

Region 6 – Timber Volume Sold Projection –Budget Capability Request 12/2015

The out-year capability for the Regional timber program is 640MMBF. In order to produce this, timber program funding needs to be consistent at ~\$70.5M.

We expect to be able to ramp up from FY16 through FY18 and be at this level starting at FY19, as shown below:

	FY16	FY17	FY18	FY19
Volume produced	590MMBF	600MMBF	623MMBF	640MMBF
	1,134,615CCF	1,165,385CCF	1,198,077CCF	1,230,769CCF
Funding needed	\$60M	\$65M	\$68.5	\$70.5M
Appropriated BLI contribution (%)	87%	88%	89%	90%
Perms & Trusts contribution (%)	13%	12%	11%	10%

CMRD at a rate of \$20/MBF associated with the timber target would also be needed.

Other Program Considerations

The remainder of the Accelerated Eastside Restoration funding that was not specifically requested to fund the timber program consists of \$1.3M WFHF, \$500k NFVW, and \$385k NFWF. If these funds were redeemed, we would be able to increase our acres of fuels treatment, forestland vegetation improved, and aquatic, riparian, and terrestrial habitat improved accomplishments. These funds would also allow us to leverage additional partner dollars through cooperative restoration projects.

As shown in our budget capability response previously submitted, the mix of BLIs received in the FY15 budget was not in line with the Regional priorities we are committed to funding. One of the major changes seen in the FY15 budget as compared to FY14 was a \$1.8M reduction in NFVW. In our Capability Response, we proposed to reverse the decrease in NFVW funding, and return back to a BLI mix similar to what was received in the FY14 budget. Please refer to the R6 Capability Response to show the mix of BLIs requested to meet the needs of our Regional priorities.

Chief's expectations for FY18 and beyond – outline for 6/16/2017 call with RLT

Clear direction and intention from Chief and Dept. to increase our restoration activities over the next several years.

Intent is to increase acres treated and volume output as a consequence.

National volume increasing to 4.0 bbf by FY20 – a 32% increase over FY17

Can only do this by doing business differently and focusing on:

- Cross boundary
 - Forests working together and across boundaries
 - sharing resources
 - zoned targets
 - Improving our outcomes by expanding treatments across and in concert with other units (FS) jurisdictions (state, private, tribal)
- NEPA –
 - Use contracts, enterprise teams, states, tribes to completely do the analysis or supplement our ID teams
 - Take a hard look at how we are doing NEPA – are we doing more analysis than is necessary; can we take more risk in some areas (WO may send out guidance on this aspect)
- Surveys
 - Limit surveys to just those required prior to NEPA
- Implementation
 - Less tree marking, more weight scaling
 - States and tribes doing the implementation for us, including contract admin
 - Ensure our silvicultural prescriptions are not more complicated than needed to meet desired conditions
- Fully utilizing perms and trusts
 - Use timber pipeline to the fullest extent possible on the sales that are expected to be able to pay it back (directed if the forests don't request it)
 - No balances older than 3 years, including CWKV
- More hands on from the RO
 - What do forests need help with?
 - Facilitating sharing of successes in using different tools

Caveats (at this time):

- Do not expect a substantially larger workforce – assume we'll fill most of the existing vacancies
- Expect some additional funding, amount is unknown but not likely to be 'enough' to match unit rate expectations.
- This is an evolving concept/plan and things will continue to change. We need to remain flexible.

What's going to happen?

- Expect a letter from the WO/Chief's office to outline the expectation with a two week turn around for a regional plan that addresses our ramp up over the next 3 fiscal years
 - R6 proportional share of the increase is to go from 610mmbf to 817 mmbf, a 34% increase (210MMBF additional) from FY18 through FY20 (over 3 fiscal cycles).
 - *Note that R6 just submitted a plan to increase to 710MMBF over 3 fiscal cycles (moderate increase) and has the potential to reach 810MMBF under current LRMPs.*
 - Realistic estimate of what it would take
 - Additional funding
 - Personnel - most likely filling existing positions, not adding new ones
 - Change in business practices
 - NEPA
 - Sale prep
 - Sale admin
- Two tiered approach
 1. Next week to 10 days: calls with each forest (staff to staff) to discuss opportunities and frame the general response
 2. Later (time to be determined)
 - 5 year restoration plan for each forest. Premise is that restoration focus on increasing acres will yield corresponding volume output (9 forests have 4 year or longer timber sale plans, 7 have only 1 or 2 year schedules)
 - Include planning and implementation of all restoration activities
 - Include work/funding with trust funds
 - Need each unit to think appropriately and possibly differently about the means to achieve these outcomes i.e. working with partners, with adjacent forests

Line to line calls to review plans, approaches, and commitments (RFT, Forest Sup, Deputy Forest Sup

We recognize that this increase may change the information submitted for the FY18 budget capability data call. We will discuss the adjustments needed either during the Q&A sessions with the forests or at another time before we develop the operating budget.

Carol has the lead and will work with other Directors as needed to frame the data, plan the calls, and subsequent interaction.

FY2017 Forest Products Volume/Funding Update and Out-Year Projections Narrative Region 6

Required Unit Rate: Funding requested in this capability response reflects the need for a total timber program funding level (appropriated funds and perms&trusts) of \$100-\$120/MBF. Region 6 has a need to “catch up” in building shelf stock in order to reduce the dependence on late 4th quarter sales and provide a more even flow of timber volume throughout a given fiscal year. Increasing the unit rate to match the actual cost of doing business will help us work toward this goal. The numbers provided in the capability template show an additional investment (higher unit rate) in FY17-19 to allow Forests to hire additional staff and begin to build their program. Once those staff are in place and additional NEPA is completed, volume production can increase at a higher rate. A commitment to increased funding levels is needed for Forests to feel confident to make the hiring decisions needed for increased timber volume production. The decreased NFTM funding level in FY17 Scenario 1 (due to lack of prior year funds) would not allow Forests to work toward an increased volume level, and would require tough decisions to be made on Forests that filled positions in line with the FY16 funding and target level. The Region is currently staffed for a timber program of ~600MMBF.

Permanent and Trust Funds (P&T): SSSS and CWK2 funding levels were adjusted in Scenario 1 to match the level of allocations planned for FY17. Over the last few years, Forests have been forced to rely heavily on P&T (SSSS and CWK2) to deliver the program because the level of appropriated funds has not provided the unit rate of funding necessary for target attainment (\$100-120/MBF). This is a short-term fix, and Forests will not be able to sustainably supplement appropriated funds at this high of a level. In addition, the continued increase in overhead rates for P&T (e.g. SS is over 77%) has effectively decreased the ability to retain funds at the Forest level. Reducing overhead rates is necessary to increase Forest-level collections and provide sustainable long-term funding from P&T accounts. In out-years we will reduce our use of P&T to more closely match collection levels, which results in an increased need of appropriated funds to produce timber volume.

WFHF Funding: Approximately 1/3 of regular WFHF program funding at a Forest-level is used to support projects with a timber output, as shown on the capability template. In both FY15 and FY16, R6 received Supplemental Hazardous Fuels funding for projects with additional timber volume outputs (14MMBF in FY15; 20MMBF in FY16). Volume associated with Supplemental Hazardous Fuels funding is not shown on the capability template; however, we anticipate proposals for at least 16MMBF of additional volume in FY17.

CMRD Funding: CMRD funding has decreased substantially over the last number of years. The FY17 Scenario 1 funding level of CMRD is not adequate to meet the basic funding needs for roads and engineering support in the Region. At a minimum, budgeting \$30/MBF is needed to meet the basic needs for the timber program. As the timber program grows, additional funding will be needed for engineering support associated with an increased timber harvest.

Currently, we have aging infrastructure and a very large backlog of deferred maintenance (\$1.2 billion) in our regional transportation system which includes roads, culverts, and bridges. As we begin implementing our minimum road analysis and timber harvests are planned on these routes, costs to implement projects will continue to increase. Funding for an annual road maintenance program is needed at a level that will address critical deferred maintenance necessary to support

FY2017 Forest Products Volume/Funding Update and Out-Year Projections Narrative Region 6

both timber and restoration efforts in the long term management of our region. Current levels of CMRD funding are not sufficient to provide minimal, safe access to meet our needs.

Other BLI Funding Needed: As shown in the FY16-FY18 budget capability response, the mix of BLIs received in FY15 & FY16 was not consistent with Regional priorities; i.e. significant reductions in NFVW (\$1.8M reduction in FY15, and an additional \$400k reduction in FY16). In order to deliver on Regional priorities and meet program commitments, NFTM supplemented these gaps of NFVW funding. In our previous Capability Response, we proposed to reverse the decrease in NFVW funding, and revert back to a BLI mix similar to what was received in the FY14 budget. The FY17 Budget data call to R6 Forests showed a need of an additional \$3M in NFVW in order to maintain programs at the current level. This data call also showed a need for an additional \$600k NFLM for landline and ROW needs.

Sale Administration: Over the past decade the FS has gained multiple authorities to accelerate the pace and scale of restoration across the landscape (e.g., stewardship contracting, DxP, GNA, etc.) which has had an enormous impact on the Agency's ability to increase project implementation. The simultaneous increase of implementation and decrease in appropriated funding, however, has exacerbated the lack of capacity to administer timber sales, stewardship contracts and service work (both vegetation and road work). In addition, the Agency is lacking qualified candidates in important contract administration roles, such as: Contracting Officers, Forest Service Representatives and Timber Sale Administrators. Finally, the Agency is experiencing increased scrutiny by environmental constituents regarding our ability to administer contracts. The Agency has legal obligations to properly administer contracts and the Region continues to recruit and develop capacity through its ongoing Contract Administrator Trainee Program and the newly developed pilot project, the Contract Administrator's Center of Excellence; however, the above highlights the need for increased sustained funding levels, particularly in NFTM and CMRD to ensure the Agency can deliver in both implementation and administrative capacities.

FY 2017 Forest Products Volume/Funding Update and Out-Year Projections

R6	FY2017 Scenario 1		FY2017 Scenario 2		FY2018		FY 2019		FY 2020		FY 2021		FY 2022						
	Funding (1000's)	Volume (MBF)	Funding (1000's)	Volume (MBF)	Funding (1000's)	Volume (MBF)	Funding (1000's)	Volume (MBF)	Funding (1000's)	Volume (MBF)	Funding (1000's)	Volume (MBF)	Funding (1000's)	Volume (MBF)					
NFTM	\$44,697	512,000	\$60,600	610,000	\$69,400	620,000	\$70,600	630,000	\$69,100	640,000	\$70,825	655,000	\$69,750	675,000					
NFRR																			
SSSS	\$5,500		\$5,500		\$4,000		\$4,000		\$4,000		\$4,000		\$4,000		\$4,000	\$4,000	\$4,000	\$4,000	\$4,000
CWK2	\$1,000		\$1,000		\$1,000		\$1,000		\$1,000		\$1,000		\$1,000		\$500	\$500	\$500	\$500	\$500
CMRD	\$17,247		\$20,187		\$20,487		\$20,787		\$21,087		\$21,537		\$22,137						
WFHF		~33%		~33%		~33%		~33%		~33%		~33%		~33%					

Update for FY 2017:

With the anticipated flat funding for FY 2017 appropriations and the likely very limited availability of prior-year funds, we're asking you to provide feedback based on two scenarios:

- Scenario 1 (flat funding to FY16 w/o prior-year funds)- What volume would you be able to produce if funding was flat to FY16 as shown in the table—without the additional prior-year and fire repay funding you received in FY 2016. (You may show unified volume under the NFTM or IRR lines if that is easiest).
- Scenario 2 (3.2 MMBF agency program level)- Given your current outlook as your FY 2016 program draws to a close, what funding would it take to reach the same targeted volume level you received in FY 2016? The volume shown is the unified volume—please show the portion of this total volume that would result from fuels projects on the WFHF line (*State and Private Forestry will be sending a letter shortly requesting proposals for supplemental fuels projects in FY17 including funding requests.*) The CMRD funding shown in Scenario 1 is the Region's FY16 allocation. Please indicate if additional CMRD funds are needed to reach the Scenario 2 volume level. If there are other BLI's where you would need additional funding please note that in your narrative. If you are facing constraints beyond just funding to reach this volume level please identify those for us.
- Volume is requested in board feet units. If you provide cubic feet data, please provide your regional conversion factor.

Looking forward for the next 5 Years (FY 18 – FY 22): (please note: this data is for scenario planning purposes only; the data will not be viewed as a regional commitment)

Increasing the pace and scale of restoration remains a high priority. Fire funding and flat budgets are likely to continue and hamper our ability to do more. However, Congress has clearly indicated their desire for the agency to increase the pace and scale of restoration moving forward through their support of the Forest Products line item. The table will inform a meaningful discussion on our capability to respond to Congress. We recognize that it will take increased funding—and importantly, predictable and stable funding—to build the program and increase restoration outputs. For FY18 – FY 22, considering the Region's capabilities, opportunities, limitations and where you want to be with you restoration efforts, please provide a projection of the output levels you can achieve and the level of investment it will take to achieve it.

- Please provide a unified estimation of outputs on the NFTM (Or NFRR line for pilot regions). If you prefer to break out the funding and volume for SSSS and CWK2 to show those contributions that is fine as well.
- On the WFHF line, please indicate the portion of the total volume that would result from HF projects funded with WFHF.

Narrative Feedback:

Please provide any assumptions, context, or other feedback you think is helpful to understand the Region's projections and the data shown.