

**[EXTERNAL] OMB Control Number "1018-Friends" : San Francisco Bay Wildlife Society  
Comments**

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Fri 1/8/2021 4:22 PM

To: Info\_Coll, FWHQ <info\_coll@fws.gov>

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 1 attachments (201 KB)

SFBWS Comment Ltr to USFWS 2020 0108.pdf;

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January 8, 2021

TO:

Service Information Collection Clearance Officer  
U.S. Fish and Wildlife Service, MS: PRB (JAO/3W)

5275 Leesburg Pike, Falls Church, VA 22041-3803

Please see attached comments for the [Federal Register Notice](#) from the San Francisco Bay Wildlife Society.

Respectfully submitted,

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Treasurer, **San Francisco Bay Wildlife Society**

*Prefer she/her pronouns*

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(408) 828-2643

cc:

Renee Fitzsimons, SFBWS BOD President FY20-21

Mary Deschene, SFBWS Program Administrator



January 8, 2021

**TO:**

Service Information Collection Clearance Officer,  
U.S. Fish and Wildlife Service, MS: PRB (JAO/3W)  
5275 Leesburg Pike, Falls Church, VA 22041-3803

**RE: Information Collection Request 85 FR 71354, 11/9/2020.**  
**OMB Control Number "1018-Friends"/Document # 2020-24802**

The enclosed comments are specific to *the San Francisco Bay Wildlife Society* (SFBWS) and its role as a Friends group for the *San Francisco Bay National Wildlife Refuge Complex* (SFBNWRC). The SFBWS, incorporated as a not-for-profit corporation in 1987 (EIN: 94-3039253), has been a partner to the SFBNWRC, first as a Cooperating Association and then as a Friends group with a Friends Partnership Agreement since 2015. [See timeline of activities and outcomes: <http://sfbayws.org/timeline/>].

**BACKGROUND:**

The SFBWS has, over the past 33 years, provided funds for **major restoration efforts** (e.g., Fremont pumphouse, boardwalk construction at the Don Edward San Francisco Bay NWR Environmental Education Center (EEC) Alviso site), employed **environmental education program staff** since 1982 at the EEC site (e.g., Watershed Watchers, Living Wetlands); published a **quarterly newsletter** (*Tideline*, now *Tide Rising*) since 1988 for the public with information about the SFBNWRC and the SFBWS; **funded USFWS volunteer recognition programs**; obtained and managed **numerous grants** from corporations, foundations, and government agencies over the years for many purposes including restoration, education, public outreach, and other visitor services efforts; **purchased equipment** (e.g., copiers, computers, binoculars, microscopes) in support of the SFBNWRC; provided employees and materials support for EEC **Summer Camp** since 1997; and many **other activities** in support of the SFBNWRC.

**CURRENT ORGANIZATION STATUS:**

1. **Reporting:** The SFBWS has consistently provided quarterly reports, published detailed grant reports, provided tax filings, published all Board of Director (BOD) minutes (except confidential compensation meetings) to the USFWS SFBNWRC staff.
2. **Grant applications** are developed in concert with USFWS staff when they are for the benefit of the SFBNWRC.
3. **Donors** (in dollar category groups though not specific dollar amounts) to the SFBWS have been publicly listed (unless anonymous status is requested) in the *Tide Rising* quarterly newsletter and the *Tideline* quarterly newsletter before that. We have followed all Federal IRS guidelines on donor details, including Schedule B filings for donations \$5K or over per year. As stated above, financial reports have been published quarterly. Nothing else has been requested. As noted in the NWRA & CORFA responses, donations raised off property have more freedom in their use as we are an

independent not-for-profit corporation; similarly, for expenditures. That said, all of our work has been to benefit the Complex, its Refugees, and our partnership.

4. **Tax filings:** we are current in Federal and State tax filings (have not yet filed FY20 ending 9/30/20, due on 2/15/21) and have provided those regularly to US FWS management staff.
5. **Partnership agreements:** we were one of the first Friends groups in the United States to sign a Friends Partnership Agreement (FPA) on 12/18/2015. Prior to that we had Cooperating Association Agreements for decades. The five-year FPA renewal agreement has been signed by SFBWS and SFBNWRC Leaders and the final Regional signatures are expected today.
6. **SFBWS Staff** (currently 6 employees, including full-time and part-time staff) in support of the SFBNWRC. Five staff members are funded by grants or donations directly for a specific purpose in benefit of the SFBNWRC. One part-time Program Administrator staff member is funded by grant administration fees as well as general donations. US FWS staff are involved in the review and interview of hired staff and as such have access to resumes of new staff. The Program Administrator for the SFBWS is not hired in consultation with the SFBWNRC; nonetheless, the SFBWS does typically provide a courtesy interview to USFWS when filling this position, as a key partner in the SFBWS's operations.
7. **Intergroup Communications & Reviews:** SFBWS employees regularly attend weekly USFWS Visitor Service meetings and have offices in the SFBNWRC centers, which promotes a day-to-day review of activities, efforts, and desired outcomes from both sides. Both SFBWS and the SFBNWRC staff have jointly engaged in periodic large reviews (Mentoring workshop; Comprehensive Conservation Plans; SFBNWRC Strategic Planning)
8. **SFBWS procedures:** We have a documented process for roles and responsibilities of SFBWS volunteers, BOD members (who are volunteers), and paid staff. These were reviewed in BOD meetings where USFWS were present and they have copies of them. Financial processes have not been provided to USFWS nor have they been requested. We do maintain our accounting books in QuickBooks for the past several years and quarterly reports are developed from them.
9. **Volunteers:** USFWS volunteers are recruited and managed directly by the USFWS staff. SFBWS volunteers manage the Nature Stores (and periodic Native Plant Sales) on Refuge sites (currently closed because of pandemic restrictions). All SFBWS BOD members are volunteers; USFWS is not involved in BOD member approvals.

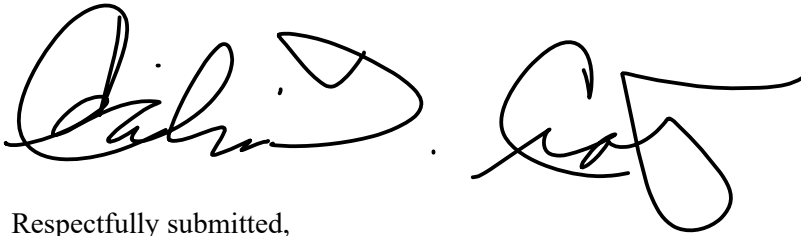
As noted, this letter provides comments to [notice in the Federal Register](#). Friends input is necessary to guide the US Fish and Wildlife Service (USFWS) in the collection of information in support of our mutual goals and objectives.

## IMPACT OF PROJECT REQUIREMENTS

1. **NWRA & CORFA Comments:** The SFBWS supports and agrees with comments (not detailed herein) from the National Wildlife Refuge Association (NWRA) and Coalition of Refuge Friends and Advocates (CORFA) statements about the impact of these new requirements, not yet fully defined.
2. **SFBWS specific major impacts**
  - a. **New Reporting Requirements:** Developing new reporting specifically for the USFWS will be supported as required; most of this will be done by SFBWS volunteers and BOD members. **It is difficult to assess the burden without more details on the requirements.** If the need is more than

noted above as already provided, it will require more effort and time beyond today's plans and expectations and **could prove burdensome.**

- b. **Membership lists:** We have not provided a membership list to USFWS nor has it been asked for. That said, the names of members who join the SFBWS are listed in quarterly newsletters, with no detailed information about those individuals (i.e., addresses, etc.). We consider this information private to the individual and the SFBWS.
- c. **Fiduciary Agent support of newly forming Friends Groups:** In the past decades, the SFBWS has been a fiduciary agent for nascent Friends groups supporting other Refuges (e.g., Salton Sea NWR, Klamath Basin NWRC, Sacramento NWR Complex). As Refuges in northern California need this support, the SFBWS stands ready to continue this nurturing activity helping new Friends groups get started under the umbrella of our not-for-profit organizational status, as we have in the past. **This is in accordance with IRS laws and is of benefit to the NWR System.** The latest information we have seen about the changes to the Friends policies would remove this option. This could be a burden and obstacle to groups hoping to form a Friends group in support of a NWR.



Respectfully submitted,

**Cecilia (Ceal) D. Craig**

*San Francisco Bay Wildlife Society, FY20-21 BOD Treasurer*

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