

[EXTERNAL] OMB Control Number "1018-Friends"

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To: Info_Coll, FWHQ <info_coll@fws.gov>

 2 attachments (123 KB)

Friends OIG comments.docx; ATT00001.htm;

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OMB Control Number "1018-Friends"

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**Friends of Alaska National Wildlife
Refuges**
National Friends of the Year 2010
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Selawik NWR

Tetlin NWR

Togiak NWR

Yukon Delta NWR

Yukon Flats NWR

Re: Agency Information Collection Activities; U.S. Fish and Wildlife Service
Agreements with Friends Organizations OMB Control Number "1018-Friends"

Comments submitted by the Friends of Alaska National Wildlife Refuges

Thank you for the opportunity to submit comments on this topic. The Friends of Alaska National Wildlife Refuges is a 501(c)(3) non-profit corporation that was formed 15 years ago by a small group wildlife conservationists. We advocate on behalf of all 16 of the Alaska National Wildlife Refuges, which cover nearly 80 million acres of land and waters. Our Board of Directors consists of Eight wildlife professionals and enthusiasts who work closely with the USFWS Alaska Regional Office, the 16 Alaska Refuges, other Friends groups around the country, and partners in Alaska and Washington, DC.

Our board has concerns regarding many of the items of information on which you are seeking input. Our main concern, which may not be addressed by other Friends groups, is the request for documents related to ongoing or resolved litigation and court cases. The Friends of Alaska NWRs takes its responsibility for the protection of wildlife refuges in Alaska seriously, and we have been involved in numerous lawsuits over the life of our organization.

We recommend that the U.S. Fish and Wildlife Service alter the Friends Policy or the Friends Partnership Agreement, whichever is most appropriate, to stipulate that any documentation related to litigation be specifically excluded from any document request. The Friends of Alaska NWRs follows legal advice and court orders for processes, including discovery. Much of this information is attorney-client privileged and is not something that the DOI/USFWS/NWRS may request without a court order, unless it is made public through the court or voluntarily disclosed by Friends or their legal counsel.

The language used thus far, such as the Friends Policy, Friends Partnership Agreements, and in this federal register notice, is extremely vague when discussing which particular items of documentation that may be requested by a refuge manager or the Service. We believe any agreement between a Friends group and the Service must explicitly lay out which documents can be requested and how often. Friends should not be required to agree to a vague promise to hand over anything requested by a refuge manager in order to remain a Friends group.

Thank you for the opportunity to comment, and please feel free to reach out to me if you should have any questions.

David C. Raskin, Ph.D.
President