

[EXTERNAL] Comments from Friends of Bosque del Apache NWR - re: OMB Control # 1018 - Friends

Deb Caldwell <ExecDirector@friendsofbosquedelapache.org>

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

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**These comments are offered by our board president on behalf of the Friends of Bosque del Apache:**

1993 was the year that a small group of volunteers and well meaning individuals established Friends of Bosque del Apache NWR. They incorporated as a non-profit under the laws of New Mexico, and obtained non-profit tax status as a 501(c) 3 through the IRS. Twenty-eight years later we find an organization that has raised millions of dollars for various projects for the benefit of Bosque del Apache NWR.

Then in the early months of 2020, Covid-19 began to have effects on operations and programming going forward for our Friends of Bosque del Apache NWR. I can't begin to tell you how important and how immediate our Board of Directors and staff reacted to the changes that were needed going forward. We reworked the budget, canceled programs, and looked at how this would affect the organization in the short term as well as long term.

As if the pandemic was not enough, in late summer we learned about something that had been moving along for a year and a half at Fish & Wildlife that became known as the OIG Audit. Probably the most disturbing facts were two actions: (1) That it would appear from the audit that the Interior OIG did not understand that Friends groups are independent corporations and Fish & Wildlife are the recipient of our fundraising efforts, (2) the Director of Fish & Wildlife almost immediate responded to the OIG accepting all of their recommendations. At this point the Friends groups were in the dark that all of this was going on in Washington. One thing became apparent- there must be a problem! We all have signed Partnership Agreements (at least our Friends organization does), so why weren't we brought in to help solve the problem with our partner?

The things you are asking us to do going forward are outside the lines and possibly illegal. We have a skilled Board that knows what is required to maintain our non-profit status with the State of New

Mexico and the U.S. Internal Revenue Service. Between our annual 990 and our annual outside opinion audit, these should give the Fish & Wildlife Service more than enough information.

We are truly Friends of our Refuge. We run a top rated non-profit to financially raise money to benefit Bosque del Apache NWR. We would look forward to helping solve the problem that brought all of this about. All Friends Groups are not the same, so let us work together in the light of day to grow and make Friends groups stronger.

Jack D. Lockridge

President

Friends of Bosque del Apache NWR