

[EXTERNAL] Response to your request for opinion re; see below

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

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This email is in response to: Coalition of Refuge Friends and Advocates (CORFA) and the National Wildlife Refuge Association (NWRA) urge you to respond to the notice in the Federal Register<<https://default.salsalabs.org/Tae0f2397-1b63-42a1-aa51-207562195f1f/1fdbfa37-939b-4475-ae3d-28de4737667d>> about collecting documentation from Friends organizations. Your input is necessary to guide the U.S. Fish and Wildlife Service (USFWS) in the collection of information in support of our mutual goals and objectives. They may also influence revisions to the Friends policy and Friends Partnership Agreement (FPA).

Not being an academic, or government official, this response is ignorant of the purposes and machinations of the USFWS, but I do have a working knowledge of the members of our Friends of Hakalau Forest organization.

1. None of us are paid for the MANY hours that we give to this organization. To be worried about whether we give a few dollars to an educational program rather than directly to the NWR is petty and does not place any value on our volunteer efforts.
2. Many of the members of FOHF were actual founding fathers & mothers of the NWR. They have been active for the entire time of the existence of the NWR and they continue to generate new members and income for the NWR.
3. If I understand our position correctly, the money that we are generating for the Hakalau Forest Refuge Mgmt Endowment and otherwise, under possible interpretations of the presently mandated partnership template, may be at risk of confiscation by the federal government. I'm sure it's highly unlikely because of the scrupulous intentions and actions of the FOHF members, but just knowing that someone else may attempt to take away what we have fought to create makes me personally question why I'm devoting so much of my personal retirement time to this worthy cause. And I'm sure I'm not the only one who has come to this realization.
4. Years ago I heard a government official say that some others in the government are constantly looking for "pools of money" to confiscate and use to their ends. It's like dangling a juicy worm in front of a hungry trout. And, voila, here we are. We probably should never have created the endowment and just stumbled along with our cash assets in the club. Not an effective strategy to help the NWR, right?
5. Another member in FOHF made me aware of some of the nuances of the current situation. Evidently there is a the potential interpretation of the mandatory Partnership template that

raising money FOR the preservation of ecosystems that may include land within the refuge, whether ON or off the refuge might be confiscated by the Service, if it, for any or no reason, terminated the Friends' Partnership agreement on as little as 60 days notice.. This seems to make no sense to me and I'd appreciate it if the Service would affirmatively disclaim any such interpretation. On a related point, Can we stand outside the gate and raise money there? And, please confirm, specifically that money raised by FOHF for the preservation of the ecosystem must only be used to support resources, as opposed to specifically for the Service or for a specific Service project is not subject to the requirement that they be turned over to the Service upon termination, although this is a distinction I'm not sure I fully understand. [Are the flora and fauna resources? Or is it defined as the labor and buildings etc (or is that "Service")?] I would have thought that the only funds subject to the turn over would be those specifically raised for the Service or a specific service project, as opposed to the preservation of an ecosystem, which may extend into a Refuge.

a. No matter how good our intentions, or how much we can raise to support ecosystems or resources which may include those within the NWR Refuge, our organization can not afford to fight over legal issues in court. So why would we sign an agreement that puts us in an untenable position?

b. Finally, the auditor appears to have lost sight of the Service's mission and the practicalities facing anyone charged with accomplishing this mission. The mission is primarily a biological one. The present underfunded Service is staffed primarily with biologists, already pressed heavily into record keeping of all sorts with scant time for the necessary biology and resource protection- constantly falling short of accomplishment due to underfunding. While this is an issue facing essentially any governmental agency, the Service simply does not have the resources to add the contemplated further non-biological detailed bookkeeping and Friend monitoring and control role contemplated. To do so would threaten the mission by diverting already underfunded staffing, staffing which has not been trained for these duties and perhaps resulting in shifting the culture from biology to accounting and legal based, as new hires are pressed into action.

Thank you for your time to consider my thoughts

Jane Mayo

Hawaii County resident and volunteer for FOHF membership database