

[EXTERNAL] Comments on OMB Control Number "1018-Friends"

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Dear Fish and Wildlife Service,

I am writing on the behalf of the Friends of Hakalau Forest National Wildlife Refuge (Hawaii), of which I am President, to comment on the Federal Register notice about the US Fish and Wildlife Service desire to collect documentation from Friends organizations. We are a small organization with no facilities on the Refuge and no paid staff. We believe that the proposed increase in documentation requested and increased oversight of the Service over our operations is an over-reach and will negatively impact both our organization and the Refuge staff who will have to spend time auditing us for compliance.

We agree that the Refuge has a right to request basic information from its Friends groups, and we provide this information, including our updated form 990s and our bylaws. We have on special occasions negotiated Special Use Agreements upon occasion with the Refuge. Our activities are summarized in quarterly newsletters which are posted publicly. We maintain legal status with the State of Hawaii as a 501(c)32 organization and as such we are answerable to our membership and the State as to whether we are doing our fiduciary duty. We conduct our own audits in accordance with our bylaws. We do not believe the Service needs to conduct an additional audit of the Friends. We believe our continued good standing as a non-profit organization in Hawaii is sufficient. We do not maintain facilities on the Refuge and nor do we conduct fundraising efforts on the Refuge. We do voluntarily share our monthly fiscal reports with the Refuge staff but this should not be a requirement. An annual audit conducted by professional accountants would cost a large percentage of our annual unrestricted income and would not be financially sustainable for our small organization. Our expenditures are for the benefit of the native species found on the Refuge and usually but not always for projects on the Refuge. For example, we may rent a facility in order to give a presentation on endangered species found at Hakalau and else where on the island. We believe that requiring that the Friends groups only spend money for projects on the specific Refuge is too restrictive and does not apply to our case, since we are not raising money on the Refuge.

Thank you for listening to our concerns. We trust our differences can be worked out and we can continue our work supporting the Refuge and Hawaii's native species.

Sincerely,

J. B. Friday

President, Friends of Hakalau Forest National Wildlife Refuge

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