

[EXTERNAL] Comments on Federal Register Notice : 1018-Friends

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

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TWIMC,

Friends And Volunteers Of Refuges, Florida Keys, dba the Florida Keys Wildlife Society, is the official friends group of the four National Wildlife Refuges in the Florida Keys National Wildlife Refuge Complex. Our sole mission is to support the USFWS's efforts to manage and maintain these wild lands. Everything we do is in support of this mission. We work closely with Refuge staff to align our efforts with theirs.

We feel strongly that as 501(c)(3) corporation all information the Service should require is already available, either in our executed Friends Agreement (which includes our by-laws and insurances), in the annual IRS form 990, through Guidestar, or via the annual renewal of our Solicitation of Contributions Registration with the Florida Department of Agriculture and Consumer Services (which includes a conflict of interest statement from each board member). Our Board of Directors members have legal and fiduciary duties to the organization that are covered by state and federal regulations and it is not necessary for the Service to duplicate these authorities. We would expect the Service in Washington to rely on local staff to report any suspected malfeasance on the part of their Friends group. We would be willing to provide, annually, a bulleted list of the activities we carried out in support of our mission.

We hope that your estimation that it will take 110 hours annually for each friends group to comply with the proposed new guidelines is an overestimate, but without knowing exactly what information you will be requesting, that is impossible to know. We are a small group of volunteers who are giving of our own time without compensation to help the USFWS. We would find an additional 100 hours/yr of "paperwork" untenable.

Thank you for the opportunity to express our concerns.

Sincerely,

Kathy Rhodes

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Kathy Rhodes

Chair of the Board of Directors

Florida Keys Wildlife Society

[www.floridakeyswildlifesociety.org](http://www.floridakeyswildlifesociety.org)

