

[EXTERNAL] OMB Control Number 1018-Friends

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Fri 1/8/2021 8:19 AM

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

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These comments are provided on behalf of the Friends of Bon Secour National Wildlife Refuge. We are a small 501(c)3 non-profit organization that provides support for the three refuges within the Gulf Coast National Wildlife Refuge Complex: Bon Secour National Wildlife Refuge, Mississippi Sandhill Crane National Wildlife Refuge, and Grand Bay National Wildlife Refuge. Our support for these refuges occurs under the terms of a cooperative agreement that we and the representatives of the U.S. Fish and Wildlife Service signed in 2017, and this agreement was developed within the policy guidelines implemented by USFWS in 2014.

The FBSNWR is an all-volunteer organization that was established in 1996 to support the Bon Secour NWR. We expanded our role in 2014 to include the Mississippi Sandhill Crane NWR and the Grand Bay NWR. Our major activities over the past decade have involved providing financial support for refuge natural resource stewardship; financial support for refuge visitor service operations; and partnerships with other non-government and government organizations to support the refuge missions.

In some respects, we are a microcosm of the diversity of missions throughout the National Wildlife Refuge System. The Bon Secour NWR was established by an Act of Congress in 1980. The Mississippi Sandhill Crane was created under the authority of the Endangered Species Act of 1973. The Grand Bay NWR established in accordance with the Emergency Wetlands Resources Act of 1986. Accordingly, refuge friends organizations need the flexibility to develop strategies that allow effective support of these varied missions.

To our understanding, we are in full compliance with the USFWS policy regarding our partnership with our refuges. We understand the need for USFWS to have guidelines that assure that our organization is an appropriate partner and supporter for refuges. However, we are disappointed with the implication by the Office of Inspector General that we and other friends organizations have engaged in inappropriate activities. Frankly, we believe that OIG has misinterpreted some aspects of our roles and missions as independent non-government entities. Furthermore, OIG's fundamental lack of understanding and appreciation of the USFWS relationship with these organizations could result in needless policy changes that drain time and finances from friends groups that could be better used in supporting the mission of the National Wildlife Refuge System.

The National Wildlife Refuge Association and Coalition of Refuge Friends and Advocates submitted comments to the Director, USFWS, regarding the OIG reports and USFWS initial response. Our Board of Directors has reviewed these comments and concur with their assessment. We urge you to review and consider their views.

To close, the USFWS response to OIG stated "By September 30, 2020, the Service will draft revised policy to address all recommendations. The policy will include requirements for annual reviews of Friends program documents and appropriate actions for non-compliance. By March 1, 2021, the Service will finalize revised policy." We have not seen any drafts of the proposed policy changes, and we believe that it would prudent for our organizations review a draft so that we can better assess the impacts on us.

Thank you for your consideration.

Sincerely yours,

Lloyd A. Culp, Jr., President

Friends of Bon Secour National Wildlife Refuge

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