

[EXTERNAL] Comments OMB Control Number 1018 Friends

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

 1 attachments (30 KB)

Comments OMB Control Number 1018 Friends Document.docx;

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U.S. Fish and Wildlife Service

Attached are the comments (OMB Control Number 1018-Friends) From The Friends of the Leadville National Fish Hatchery. We appreciate the opportunity to comment on the notice in the November 9, 2020 Federal Register p. 71354-71355, v. 85, no. 217.

Sincerely,
Mark Cole, President
Friends of the Leadville National Fish Hatchery

Sent from [Mail](#) for Windows 10

January 8, 2021

Subject: OMB Control Number 1018-Friends Document #2020-24802

U.S. Fish and Wildlife Service:

The Friends of the Leadville National Fish Hatchery appreciate the opportunity to comment on the notice in the November 9, 2020 Federal Register p. 71354-71355, v. 85, no. 217 on the US Fish and Wildlife Service's desire to collect information and documentation from Friends organizations. We are a small Friends group that supports the Leadville National Fish Hatchery just outside of Leadville, Colorado.

We share the concerns expressed by the National Wildlife Refuge Association and the Coalition of Refuge Friends concerning the overly broad nature of the Fish and Wildlife Service's request for information from Friends groups. We would like to focus on how these potential extra financial and corporate document requests could burden and negatively impact our small organization. The table on page 71355 is particularly alarming. If we ignore the infrequent document requests such as the initial formation of the Partnership Agreement, the 5-year renewal of the Partnership agreement, the initial formation of the Supplemental Agreement and its 5-year renewal, and the Friends Group Staff Resumes (we have no staff), the estimated annual reporting burden is 158 hours. This, when added to the work hours our board volunteers to run our group during 2020, would represent an additional workload of approximately 40%. An increase of such magnitude would put a severe strain on the board and hurt the Hatchery in the long run as we would have to devote more time to "paper shuffling" and less time to Hatchery needs.

We believe that any reporting requirements should be tailored to the size and resources of the Friends group. One size does not fit all. We are more of a check book operation while other Friends operate more like a large business. The controls and reporting requirements should be tailored to the size of the organization.

In this same vein we believe that annual collection of financial information, project reports, etc. is adequate. The Fish and Wildlife Service is kept fully informed as the Hatchery Liaison, in our case the Hatchery Manager, attends all the membership and board meetings and receives the same information that the board receives. He/she also provides an updated summary of hatchery activities. So, the Fish and Wildlife Service is kept fully informed, through the hatchery manager of all the Friends projects, our financial situation, status of the Friends group, and copies of all the Friends documents and financial reports presented at each board meeting. He knows as much about our Friends group as any board member.

Internal financial controls should be none of the Fish and Wildlife Service's business. Income and expenses are legitimate concerns, but how the Friends conduct our internal business is best left to the state in which we are incorporated and the board that runs the organization. The board has a fiduciary responsibility to maintain adequate controls. We believe that the request for information by the Fish and Wildlife Service as presented in the Federal Register is overly broad and undefined. As such, the Fish and Wildlife Service is overstepping.

Mark R. Cole, President
Friends of the Leadville National Fish Hatchery