

[EXTERNAL] Comments on OMB Control Number 1018-Friends

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Wed 1/6/2021 7:07 PM

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

 1 attachments (100 KB)

Comments from Friends of the Lower Suwannee & Cedar Keys NRWs - Final.pdf;

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A reply from the Friends of Lower Suwannee & Cedar Keys NRWs to your Call for Comments is attached.

Peg Hall
President-elect
Friends of Lower Suwannee & Cedar Keys NRWs

**Comments from Friends of the Lower Suwannee & Cedar Keys National Wildlife Refuges
the proposed collection of information by the U.S. Fish and Wildlife Service (the Service) in
conjunction with the Friends Partnership Agreements.**

As we see it, the proposed paperwork would impose a significant burden on the Friends of the Lower Suwannee & Cedar Keys National Wildlife Refuges, a community-initiated and community-based independent, 501(c)(3), nonprofit corporation registered in Florida. We believe the paperwork burden would decrease the ability of our Friends organization to operate our [programs](#) and fulfill our purpose of building awareness and appreciation of the Refuges.

The Service estimates that the proposed collection of information will require 212 hours of paperwork annually by each Friends organization. It is likely that none of our 200+ members or 17 volunteers on the board of directors would willingly take on this paperwork task instead of what they currently volunteer to do. If, instead, we hired someone to do it, a reasonable salary would consume about two-thirds of our annual income of more-or-less \$5,000. That is overly burdensome.

To address your specific questions:

- (1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility*

Our comment:

No, the collection of information does not seem necessary for the proper performance of the functions of the agency (the Service) or of our Refuges. The stated purpose of the national wildlife refuges is “the conservation, management and, where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.”

The collection of detailed information about what we as an external, independent, nonprofit organization do to meet our mission does not seem essential or particularly pertinent to how the Service and our Refuges perform their functions. If we are fully successful, there will be more appreciation for our Refuges and what they do. But it is not pertinent to the Service’s function to know the details of our finances, or our program plans and execution.

- (2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used*

Our comment:

We believe that the burden imposed by the proposed action should not be weighed by the number of hours required to gather and input the information but by how much our Friends group and our Refuges lose if our work is shifted to completing paperwork. It is false to say that the “annual nonhour burden cost is ‘None’.”

Here are four examples of what could be lost in one of several of our key program areas:

- Communications: Instead of 12 monthly updates to our [website](#) and 12 monthly publications of [News Brief](#), we would have volunteer time for only seven of

each. Currently four volunteers contribute a total of about 45 hours a month to produce these communications. We and the Refuges would lose about 3,000 communication contacts a year.

- Control of Invasive Species: Instead of volunteers working with Refuge staff on control of Brazilian Pepper during 16 weeks each year, we would only have volunteer time to work six weeks a year. Currently on average seven volunteers work together with Refuge staff three hours a week. We and the Refuges would put at risk having these invasives more-or-less under control, as they are now.
- Interpretive Panels, printed Trail Guides, and Refuge-Information Kiosks: About 150 hours of volunteer time each year goes to the design of interpretive panels, kiosks, and 21 trail guides. We and the Refuge would lose it all.
- Conservation Education: Conservation and preservation of the Florida environment for wildlife is key to the mission of our Refuges. Our volunteers devote about eight hours a week to sharing information and encouraging appropriate action in environmental conservation, such as voicing our opposition to the Toll Road proposed to run through our Refuge's watershed. We and the Refuges would lose about half of that effort to the 212 hours of paperwork.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected

Our comment:

The program and financial information which we share openly on our website and at our board meetings has the quality, utility, and clarity needed for our purposes and those of the State of Florida and the IRS. It is not appropriate to require us to re-package our information into a version the Service prefers. We are not part of the Service. We work to advance their wildlife and conservation mission, but we don't work for the Service. We work for our members.

(4) How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response.

Our Comment:

The Service can minimize the burden by accepting information that it is already produced by each Friends group. The Service should accept the information in the format we use to meet our organizational needs. The Service should accept the burden of formatting it to meet their perceived needs, not force that work on "partner" nonprofit organizations.

Because of the demands the Service is making, the Friends of the Lower Suwannee & Cedar Keys National Wildlife Refuges has, to this point, not signed the Partnership Agreement with the Service. We will continue to resist signing it until it is clear that agreeing to "partner" with the Service does not significantly damage our ability to meet our established purpose and fulfill our legal responsibilities to our members and our charter.