

[EXTERNAL] OMB Control Number: 1018-Friends

Kenyon, Simon J <skenyon@purdue.edu>

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

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My name is Simon Kenyon, President of the Friends of Eastern Neck (FoEN), and I am responding to "1018-Friends" on their behalf. Eastern Neck NWR is part of the Chesapeake Marshlands National Wildlife Refuge Complex.

The information collection described in the Federal Register announcement will put a huge burden on FoEN, which is a 100% volunteer organization. We calculate, that even excluding the drafting and updating of partnership and supplemental agreements, supplying the information for which USFWS is asking will require at least 116 hours (>14 days of FTE) or three weeks of full-time work. We do not have the people to do this. If we did attempt to meet the reporting requirements it would directly impact our efforts in support of the Refuge, even though supporting the mission of the Refuge is our *raison d'etre*.

To respond to the specific items requested:

1. It is not at all clear why you need this information. Under our byelaws the USFWS Refuge Manager is an *ex officio* member of the Board of the Friends of Eastern Neck, attends all meetings and receives the Board minutes and monthly treasurer's report. USFWS already knows how we spend our money. In any case we are an independent 501(c)3 organization and all the information USFWS can legitimately request is in our IRS 990 filings. We are answerable for our financial probity to state and federal authorities who are responsible for oversight of our organization. USFWS is over-reaching by demanding to know all the financial workings of an independent not-for-profit that only seeks to support your mission.
FoEN rejects the idea that you need to know details of our donations and revenues, especially those that are generated outside of the on-site bookstore. We also reject the assertion that all our expenditures must "benefit the applicable refuge". We have an organization to run that has its own legitimate expenditures. We have an obligation to our board, our members, and our donors to maintain the Friends organization, as well as to support the Refuge.
2. We do not doubt the accuracy of the estimate of the excessive burden that will be placed on FoEN in trying to meet USFWS' information demands.
3. The information USFWS needs can be found in our IRS filings. That is all you can legitimately ask for.
4. Access to the IRS database. Our USFWS local partner has all the other information you are requesting about our organization, but we do not believe it needs to be reported to USFWS administration whether in enhanced electronic form or any other. The real question is why USFWS needs the information about our organization at a granular level, and what you will do with it. None of this has been explained.

In closing, the request for information in this notice is vague, open-ended and intrusive. Friends of Eastern Neck needs a better explanation of why USFWS needs this enhanced level of information. This proposed over-reach is likely to burden the Friends organization to the point where it cannot meet the demands for information and it threatens the whole basis of the partnership with our USFWS colleagues at the Complex.

Sincerely

Simon Kenyon
President, Friends of Eastern Neck