

PUBLIC SUBMISSION

Comment from Hill, A

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The proposed USFWS collection of information from Friends groups is supposedly being done to "reduce paperwork" of the Paperwork Reduction Act. At least our Friends group is already working very closely with our local USFWS manager, providing relevant information. We provide all required information to the IRS, and that information is provided to members and our local manager. We provide all financial information to our membership, and any and all of that information is available to the public request. We are a small, all volunteer organization - absolutely no paid staff. All but a minimum portion of our raised money directly to refuge support, education programs, and other mission relevant expenses. It is already hard enough to recruit experienced officers, particularly to positions overseeing record keeping. Any additional reporting requirements would further discourage participation. If your goal is to cripple smaller friends groups, your proposal is right on point. Otherwise, unless there is reasonable concern, let the refuge manager and friends group work out reporting requirements.