

# STATE OF ALASKA

**DEPARTMENT OF NATURAL RESOURCES**  
**OFFICE OF PROJECT MANAGEMENT AND PERMITTING**

**SEAN PARNELL, Governor**

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December 2, 2010

Kevin Kilcullen, Visitor Services  
National Wildlife Refuge System  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive, Room 635  
Arlington, VA 22203

Dear Mr. Kilcullen:

The State of Alaska reviewed the October 18, 2010 Federal Register Notice for the Draft Friends Organizations Policy and the referenced 633 FW1-4 Draft Friends Policy. The letter represents the consolidated views of state agencies.

The State recognizes the value of engaging in partnerships pursuant to the Volunteer and Community Partnership Enhancement Act of 1998. Such partnerships encourage the use of volunteers, promote public awareness and conservation of public resources, and encourage monetary donations or other in-kind contributions in support of the National Wildlife Refuge System. We appreciate this draft policy attempts to provide sideboards for working with the National Friends Program (Friends). *However*, we have serious concerns about the Service partnering with non-governmental organizations that openly lobby against proposed projects or plans for which the Service is tasked with objectively evaluating through the National Environmental Policy Act. For example, the Alaska Refuge Friends Newsletter of 2009-2010 advocates for the defeat of proposed land exchanges involving both the Izembek and Yukon Flats national wildlife refuges. More specifically, the introductory letter from the Alaska Friend's President refers to the proposed King Cove to Cold Bay Road associated with the proposed Izembek land exchange as the “*disastrous road*” and the Service’s decision to adopt the “*no action*” alternative in the Yukon Flats land exchange as a “*major victory*.<sup>”</sup> It is especially disconcerting that the Service’s website also provides a direct link to the Alaska Friends website and this inflammatory information, which calls into question the Service’s ability to objectively evaluate such projects.

This draft policy provides guidance for Service employees that are members of Friends groups or serve on a Friends Board of Directors. While we understand the Service may not dictate what employees do as private citizens on their own time, the policy falls short

in ensuring that Service employees in leadership and decision making positions do not abuse their professional knowledge of specific project or planning efforts for which the Service holds a legal responsibility. For example, the policy appropriately allows employees to serve on a Friends Board of Directors in an advisory capacity and on committees, but does not require that they refrain from engaging in advocacy activities or deliberations where there could be an actual or perceived conflict of interest. While we understand there will be many situations where serving on a Board or committees would not pose a conflict of interest, the policies need to clarify that when a potential conflict of interest does exist, employees *must* refrain from participating. We also request the policy prohibit posting Friends links on Service websites and facilitating Friends literature sales and distributions at Service facilities that include lobbying efforts to influence Service-driven projects, plans and policies. Assisting the Service with implementation of its mission should not include openly supporting Friends efforts to influence controversial Service decisions.

The majority of Friends efforts and activities nationwide support the Refuge System's mission by providing valuable services and information to the public, such as volunteer weed pulls, assisting with interpretive programs, or providing funds or labor for trail construction. However, the Service needs to maintain an arms-length relationship with the advocacy side of Friends groups to ensure partnership activities are not only consistent with Department of Interior ethics guidelines, but are also transparent and beyond reproach.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Fogels".

Ed Fogels  
Director