

**Association of Midwest Fish & Wildlife Agencies Resolution  
Regarding  
USFWS Interim Guidelines on Field Trials**

**Resolution:**

The AMFWA does not support the interim USFWS Federal Aid field trial guidelines for the following three reasons.

- There is no need for creation of a national policy. The provisions of 50 CFR part 80.14(b) already provide sufficient guidelines for management of these lands, and the states are in the best position to interpret these requirements.
- The guidelines imply an unneeded U.S. Fish and Wildlife Service (FWS) approval role in approving field trial plans.
- These guidelines set a precedent for all uses of land acquired or constructed with federal aid funds. The likely expansion of the issue to other recreational uses warrants further discussion prior to developing any guidelines that impact the states' ability to manage public use on these lands.

**Justification:**

It is reasonable to expect States to have policies and procedures in place for managing and providing oversight to field trials on Federal Aid funded lands. States have established policies and regulations for conducting field trials that insure the protection of wildlife benefits. State wildlife and fish managers most familiar with specific conditions, habitat needs, and the impact of field trial activities can best assess the appropriateness of field trials on our state lands. We are diligent in protecting our wildlife lands to make sure that all activities, including field trials, continue to serve the purpose for which the land was acquired or constructed. The FWS should monitor state policies through the existing process of field reviews conducted by Division of Federal Aid staff. Management issues (such as oversight of field trial programs) should NOT be part of financial audits.

We see no value in requiring states to develop additional procedures in consultation and cooperation with FWS relating to field trials beyond what already exists. Doing so creates a precedent for establishing similar regulation for almost any activity that could take place on the lands we manage. It leads to redundant paperwork and inefficiencies for state and federal staff to serve our publics.

The management of our Federal Aid funded lands is well founded under existing law and policy. It is our position that federal approval for management was obtained when the FWS approved the acquisition of these lands with federal funds. We strive to implement those laws and policies to protect and enhance the wildlife values of those lands. We feel the authority to make decisions on management activities on those lands lies at the State level, and that additional policies and regulations at the national level are unnecessary.

**Adopted: July 17, 2001**  
**Saint Paul, Minnesota**

**Signed:** \_\_\_\_\_  
**Timothy P. Bremicker, President**