

# STATE OF ALASKA

## CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

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April 25, 2011

Alaska Resource Advisory Council  
Bureau of Land Management  
Alaska State Office  
222 W. 7<sup>th</sup> Avenue, #13  
Anchorage, Alaska 99513

Dear Alaska Resource Advisory Council Members:

Recently, the Citizens' Advisory Commission on Federal Areas (CACFA) asked Mr. Bud Cribley, Alaska State Director for the Bureau of Land Management to initiate a formal review and revision of the agency's policy for permitting the use and construction of trapping cabins. Over the last year or so our Commission has met with a number of trappers here in the Fairbanks area to discuss their concerns with the current policy which has been in place since 1987. We have also met on several occasions with BLM officials during that time to discuss possible revisions.

In response to our request, Mr. Cribley indicated that he is asking the Resource Advisory Council (RAC) to advise him regarding the need for a policy revision. We are pleased that this issue has been referred to the RAC for discussion at your April 26 and 27 meeting in Anchorage. Mr. Cribley has invited our attendance and comments at that meeting. Unfortunately, I am out of state at this time and it is unclear if any of the CACFA members will be able to attend. I am taking the liberty of providing written comments on this issue.

Current cabin policy contains economic criteria that is difficult, if not impossible, for the majority of trappers to meet. Because the BLM classifies trapping cabins (other than those permitted for use by federally qualified subsistence users) as commercial cabins, existing policy requires that the commercial activity generate at least 25% of an individual's annual gross income before a lease or permit for cabin use or construction will be issued. Every trapper we have spoken with clearly feels that this figure is not feasible and does not reflect current economics with respect to trapping.

We should also note that several Resource Management Plans (RMP) adopted in recent years address the economic criteria for issuing a cabin lease or permit somewhat differently than the existing policy. For example, the Ring of Fire RMP (03/08), the Kobuk-Seward RMP (04/08) and the Bay RMP (11/08) refer to need of the applicant to document the profitability of the guiding or trapping operation, or to show actual use for profitable trapping purposes. None of the plans mention the 25% figure with regard to income.

The *Analysis of the Management Situation* for the Eastern Interior RMP, scheduled for release later this year, contains the following statement: "Cabins may be authorized by permit, only if the value of the structure can be amortized over the period of the permit. 43 CFR 2920.1(b)." Again this is a different standard than the flat 25% figure. The *Analysis* also states: "The policy on cabins and related structures, located or proposed to be located, on BLM managed lands in Alaska is currently under review and BLM may issue revisions to its current policy."

CACFA requests that the Alaska Resource Advisory Council advise the Bureau of Land Management that the existing cabin policy is in need of revision and encourage a formal review process that involves consultation with trappers and other user groups. Commission members and staff are available to provide assistance in organizing this effort.

Thank you for the consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Leaphart", written in a cursive style.

Stan Leaphart  
Executive Director