

For distribution at CACFA Meeting May 29, 2026

What is this document? — A set of guidelines developed during 2024 discussions between BLM and the Alaska Trappers Association (ATA) to resolve decades-old issues in the permitting process to build and use existing cabins for trapping on land managed by BLM.

Why were the “Guidelines” developed? – Applicants and administrators needed a consistent, transparent process for permitting cabins necessary for trapping on BLM lands as authorized in ANILCA Section 1303.

Background: At the urging of the delegation, BLM State Director Steve Cohn initiated meetings in January 2024 between designated policy staff and representatives of the Alaska Trappers Association (ATA) with a stated commitment to resolve long-standing issues involving permitting of cabins.

Many past issues involved inaccurate information on ANILCA’s cabin provisions among BLM administrators and applicants, compounded by BLM’s application of the national FLPMA rules. Despite ANILCA’s protections of traditional activities and cabins on all federal lands, for a period of time BLM was only permitting cabins for subsistence use or for commercial use by individuals who could demonstrate 25% of their income derived from trapping. In some cases BLM staff incorrectly claimed cabins were not allowed at all. Very few cabin permits were issued; in fact, only one trapping cabin permit was issued in the last 10 years.

While adoption of ANILCA-based regulations is the preferred long-term solution, the group agreed that BLM could implement interim resolution by improving consistency in the permitting process. BLM agreed to look into their discretionary authority to adopt consistent fees for administration, monitoring permit compliance, bonding, land rental, NEPA, and others required by FLPMA. ATA agreed to compile a document that would resolve issues by proposing consistent application requirements, costs, processing timelines, and discretionary stipulations for trappers and administrators alike.

Attached are the resulting draft Guidelines, proposed to establish a consistent BLM permitting process that authorizes cabins consistent with ANILCA’s provisions to continue traditional activities necessary to maintain the Alaska way of life. These Guidelines reflect modifications made as a result of several meetings of the group. Unfortunately, once the State Director moved on, no further progress was made.

Next steps: (1) Request BLM re-engage with CACFA to conduct public review, agree to further modifications as necessary, then adopt these Guidelines as an Instructional Memorandum; and (2) Request BLM to amend the “Alaska Supplement to the Bureau Manual 2920 (Nov. 2, 1987)” to add “.05(D) ANILCA Cabins” and other revisions to implement ANILCA cabin provisions missing from the Manual’s cabin categories of “commercial” and “subsistence”, as drafted and agreed to by CACFA and BLM staff in 2016.

GUIDELINES: Use and Construction of Cabins for Trapping Activities on Bureau of Land Management Lands in Alaska¹

While cabin provisions in the Alaska National Interest Lands Conservation Act (ANILCA) apply to many “traditional and customary”² activities, these Guidelines are specific to cabins used for trapping-related activities. Trapping cabins and support facilities are a “minimum impact” non-exclusive use of public land for which authorization is given for the minimum number of structures of the minimum size on the minimum acreage to meet the basic requirements of the ANILCA-protected cabin use to facilitate continuance of ongoing pre-ANILCA activities as intended by Congress. In recognition that trapping cannot feasibly occur in many areas without facilities determined necessary by the trapper, administrators will expeditiously issue permits for qualifying applications to facilitate trapping as a traditional and customary activity. BLM recognizes that “trapping” is a method of regulated harvest of wildlife, which is not categorized as a commercial, recreational, or subsistence activity.³ By issuance of these Guidelines, BLM finds trapping and its necessary facilities is a traditional and customary activity that is compatible with the purposes of Alaska lands administered by BLM under its management plans.

Who qualifies for a trapping cabin permit? Cabins and related structures may only be permitted for use and construction by Alaska residents and be occupied by the cabin permittee(s) and the permittee’s authorized guests during the period of permitted use. Incidental activities shall involve minimal time compared to trapping-related activities. The permittee(s) must document or demonstrate the following by including information with the required application form 2920-1⁴:

1. Documentation of Alaska residency (e.g., Alaska ID or Driver’s license, tribal membership card)
2. Acquire all necessary state, local and federal authorizations, if any (e.g., trapping license)
3. Engage in 60 days of trapping during at least one of past three seasons, or if a new venture, provide a detailed description of the proposed activity, trapping knowledge, and commitment
4. Own at least 20 steel traps and/or snares
5. Document involvement (such as trapping with family members) and/or investment in trapping activity, e.g., receipts or acquisition of fuel, equipment, and/or tools; sealing records and/or fur sale receipts; trapping log book)
6. Permittee is required to acknowledge no ownership in the land and of permanent facilities; permittee may own and relocate temporary facilities.

Where will the cabin be located? An existing cabin or an area or site for a proposed cabin shall be identified on a US Geological Survey map 1:63,360 scale or better along with photos or a description of site characteristics, e.g., slope, vegetation type and density, proximity to waterways and access routes.

1. Verify that the State harvest regulations for the surrounding area allow harvesting under a valid trapping license.
2. Verify BLM is the land owner, see https://sdms.ak.blm.gov/scanned_images/mtpindex.html

¹ These Guidelines are effective immediately upon adoption by the BLM State Director and replace Instruction Memorandum IM-AK-2012-022.

² “Traditional and customary activities” are those activities generally occurring in the area or region by 1980.

³ These Guidelines modify the permit process to provide standardized requirements, costs, and timelines to reduce confusion, unnecessary requirements, delays, and costs to administrators and applicants alike. BLM will amend the “Alaska Supplement to the Bureau Manual 2920 (Nov. 2, 1987)” to add “.05(D) ANILCA Cabins” and other revisions to implement ANILCA cabin provisions missing from the Manual’s cabin categories of “commercial” and “subsistence”. The law—ANILCA’s provisions—supersede the Manual’s omissions and must be implemented.

⁴ The 2920-1 form expired June 2023 according to the BLM website, although the form itself says it expired in 2014 and BLM has authority to waive its use. Until replaced by a new form, it is incorporated in these Guidelines.

3. Identify any BLM land management plan provisions applicable to the site (available online at www.arlis.org or local field office). If the plan incorrectly prohibits cabin construction or use, the applicant or administrator may request State Director approval of an amendment.⁵
4. Explain why no alternative site off BLM land would be feasible. (Use of alternative sites off BLM land is preferred but might not be allowed by the landowner; BLM will not require an applicant to prove rejection by such landowners.) BLM will not require an applicant to use an alternative site except to prevent significant environmental damage or to reduce measurable conflicts with major public events or uses at that specific site.
5. Identify public uses and users of the site and surrounding area during winter, if any, and estimate impacts on those users if the facilities were permitted.
6. The cabin site must be at least 2 miles by direct line from another trapping cabin (consistent with the 2-mile separation between cabins required by the State).
7. The cabin site must be at least 10 miles from a public road ordinarily used by highway vehicles during the trapping season (consistent with the State's current rules).
8. Describe the estimated value (need) of the location for health and safety for the permittee.
9. A new cabin will generally be limited to 400 square feet (20x20 or equivalent) (as recommended by RAC cabin subcommittee Resolution 11-01, November 30, 2011) but may be permitted larger to accommodate trapping family needs. Related structures for new and existing cabins may include a cache (maximum 60 sq ft), a work shed (maximum 120 sq ft), a 3-sided wood/snow machine shed, and an outhouse. Up to three "line cabins" (each a maximum 150 sq ft) may be permitted along with a cache (maximum 30 sq ft) and an outhouse.⁶

What details are required in a proposal? Detail the proposed cabin construction and use, disposal of garbage, storage of fuel, cabin heat source, etc., including:

1. Description of the location of the proposed cabin site, and attach a map and/or provide GPS coordinates of the location (details of access by any means legal on BLM land are not required).
2. Sketch or photo, size and footprint of the cabin and related structures (cache, outhouse, fuel storage, work shed, etc.).
3. History of applicant's use of the area, if any, and plans for future use over the next five years for the cabin permit.
4. An estimate of the timeframe and number of days needed for construction or rehabilitation, future trapping-related use, annual maintenance, and seasonal preparation of the cabin and related structures; include any use outside of the trapping season.
5. Environmental safeguards for disposal of human waste and non-compostable garbage; use of site and area outside of trapping season (including transportation of fuel, acquisition of firewood), etc.
6. Any on-site materials to be used in construction and maintenance that may require additional permits and material sales from the BLM and/or other agencies. Acquisition of any such additional permits may be required before BLM issues a permit or applicant may modify plans.
7. If the proposal involves lands in conveyance to the State and/or Native Corporation, BLM as the "interim" manager may require a letter of non-objection before issuing a permit.
8. A plan for removing the cabin and associated equipment and outbuildings in the event of non-renewal by the permittee or failure to adhere to stipulations (and a new permittee is not found

⁵ Area and unit-wide prohibitions conflict with ANILCA purposes and Sec. 1303

⁶ These supporting facilities provisions were developed and agreed in negotiations between BLM and CACFA in 2015 but were not adopted due to administration and BLM staff changes

to take over the site or the cabin is degraded beyond repair). BLM will retain cabin sites for public safety wherever possible.

What is the process for permitting use and/or construction of a cabin on BLM land? A pre-application meeting with the area or unit's BLM field office is not required but is strongly encouraged. The meeting provides the applicant and BLM manager an opportunity to discuss the proposed construction of a new cabin, or improvement and use of an existing cabin, plus necessary support facilities and site-specific environmental considerations, and to identify any additional considerations. This meeting helps ensure the application is sufficiently detailed for BLM to perform its environmental review and engage other agencies and otherwise determine how to satisfy any applicable agency requirements in issuing the permit/lease.

1. The BLM administrator shall document the date of contact and any reasons for rejecting an application, i.e., whether the applicable management plan or ANILCA explicitly prohibits the cabin in the specific area⁷. The BLM administrator may propose stipulations to assure minimum surface disturbance and may suggest alternate sites and modifications. The administrator will provide the applicant an opportunity for concurrence as to accuracy of the documentation.
2. A "Notice of Realty Action" (NORA) is not required because the land remains non-exclusive use as federal public land managed under its applicable management plan (A NORA is required for a change in land ownership or management under the Recreation and Public Purposes Act; a NORA is not required when the permit is a "minimum impact permit" under CFR 2920.2-2).
3. Using Form 2920-1 along with required supplemental materials, the application must be submitted in duplicate to the BLM office that manages the area of the cabin construction and use. When requested, BLM may accept an oral application with the required information provided orally, and electronic supporting materials and signature. Receipt of the written or oral application will be logged to assure timely processing.
4. The administrative cost recovery required for BLM processing the application, including NEPA compliance, is a maximum one-time fee of \$100.00 which is not reimbursable and must be paid to accompany submission of the application.
5. Within two weeks of receipt of an application, BLM may request additional information or will notify the applicant of additional information needed from other agencies, such as:
 - a. The Alaska Department of Fish and Game may be contacted regarding wildlife habitat or the US Fish and Wildlife Service may be contacted regarding proximity to eagle nests and other wildlife protected sites.
 - b. An applicant may need to acquire additional authorizations before construction, such as a Clean Water Act §404 permit from the Army Corps of Engineers if construction involves filling in waters or wetlands; or a General Permit for Solid Waste Disposal from the Alaska Department of Environmental Conservation.
 - c. The BLM administrator will provide the applicant with proposed stipulations to reduce surface impacts and will prioritize resolution of stipulations that create hardship or make use of the new or existing cabin infeasible. However, no cabin or related facilities will be permitted on a site that blocks public access to public lands and waters.
 - d. The applicant may appeal stipulations in writing to the Alaska State Director, who will respond within two weeks; no response will be considered approval of the appeal.

⁷ ANILCA Section 1303(b)(2) prohibits issuance of permits for cabin construction for "private recreational use", defined as use primarily for the purpose of private, exclusive recreation. Neither ANILCA nor FLPMA prohibit construction of cabins for non-exclusive, public recreational use.

6. BLM will complete an environmental analysis in consultation with the applicant and the administrator will issue a decision (Finding of No Significant Impact or Categorical Exclusion) within 60 days from receipt of the application and supplemental information to provide time for public notice, if required, for existing and new cabins, as applicable under NEPA rules. Use and rehabilitation of existing cabins are categorically excluded and BLM may find new cabins are low-impact, traditional activities that qualify for use of categorical exclusions.
7. The required fees, bonds, and rental costs are waived and/or modified from the normal schedule under the discretionary authority granted in FLPMA rules⁸:
 - e. The BLM requires land rental costs for a trapping cabin (not to exceed \$250 per year) and monitoring costs (not to exceed \$100 total annually for all facilities on one permit) to be paid annually before issuing a permit or renewal.
 - f. The BLM waives all cost recovery and other bond requirements to encourage these traditional and customary uses Congress sought to continue as important for Alaska's heritage and important for the health and safety of all users of public lands. Such waiver does not relieve the permittee of responsibility to maintain safe and clean site conditions, and permittee is liable for restoration, if required, regardless of bonding.These Guidelines modify the rental schedule for land use authorizations and restoration bonds for trapping cabins due to their non-exclusive, seasonal use and importance for public health and safety. The BLM specifically eliminates the individual appraisals of fair market value, thereby reducing time and costs to process an application and providing consistency and affordability for this minimal, non-exclusive use of BLM land Congress recognized as necessary to feasibly and safely trap on public lands in Alaska as part of continuing traditional and customary uses.
8. The permit applicant is responsible for forest fire protection of the cabin, related structures, and area within 150 feet and will be held responsible for damages to the habitat caused by cabin user negligence during the periods of permitted use.

When will BLM issue or renew a permit and when can the cabin be used by non-permitted users?

1. Upon completion of all procedural requirements and fees paid, BLM will issue a permit within two weeks, then an applicant can begin construction or use the cabin per permit terms.
2. BLM can revoke the permit at any time for noncompliance of permit stipulations, but BLM will first reasonably notify and provide an opportunity for the applicant to resolve noncompliance.
3. Other users may use the cabin when not in use by the permittee. The cabin may be used by anyone at any time in health and safety situations. Federal, state, and local authorized officials have the right to enter the facilities at any time on official business.
4. The permittee(s) has exclusive use of the cabin only during the trapping season and other times as specified in the permit, including up to 30 days each for pre- and post- trapping season preparation, clean-up, and seasonal transport of garbage and supplies, maintenance, collection and storage of firewood, and construction. The permit conveys no possessory interest in the land or permanent structures. The permittee may lock and store equipment and nonperishable items as designated by the permit during periods not authorized for use by the permittee.
5. The permittee may sublease the cabin for the period of permitted use with the BLM administrator's prior written approval, but the permittee remains responsible for the sublease occupant's adherence to all terms of the permit.

⁸ 43 CFR 2920.7(g) "The authorized officer may require a bond or other security satisfactory to him/her to insure the fulfillment of the terms and conditions of the land use authorization." As such, the bonds are discretionary. 43 CFR 2920.9-3(d) affirms the permittee is liable for the cost of removal and restoration regardless of bonding.

6. The permittee will submit an annual report to the BLM administrator by July 1 each year on use of the cabin and request renewal in five-year increments, as applicable.
7. Within two weeks BLM will acknowledge receipt of the annual report, advise the permittee of any noncompliance, and/or renew the permit for an additional five years, as applicable.
8. The permit or lease will be cancelled for failure to use the cabin for three consecutive years, to pay required fees, and/or to submit the annual report for two consecutive years, unless the BLM administrator gave prior written approval.
9. In cases where permits are revoked or abandoned, BLM will work with Alaska Trappers Association and/or other organizations to locate/permit a new applicant that assumes responsibility for the cabin permit stipulations, as appropriate, and/or to restore the site. Only in cases of environmental damage or substantial degradation of structural integrity beyond repair will an existing cabin be removed or be required to be removed.

Attach: 2920-1 FORM FOR TRAPPING CABINS IN ALASKA, *submit this form and attachments in duplicate. Applicant files applicable portions of Page 1 to submit; the applicable BLM administrator will complete page 2. Upon approval a signed copy will be returned to the applicant.*