



2017 Trappers Cabin Specifications and Application Procedures

Operations Division
January 1, 2017

Purpose

To establish a consistent process for the interpretation and issuance of required structures under a Registered Fur Management Area (RFMA), including all listed partners.

Environment & Parks (the "Department") and Alberta's trapping industry have identified the need for clear, consistent standards for the location, construction and operation of these structures to ensure a consistent approach is maintained for use of public land for commercial trapping purposes.

The standards within this document provide clear expectations regarding structures on public land for the purpose of commercial trapping. The standards support an integrated approach to public land management while enabling and supporting the business of trapping in Alberta.

Objectives

The objective of this document is to:

1. Allow the authorized construction and seasonal use of structures under an RFMA to facilitate the safe and efficient harvest and management of the fur resource within the RFMA.
2. Deter the use of trapline structures authorized under a RFMA for purposes and activities that are not associated to trapping.
3. Establish standards for structures including; proximity on the land, size limitations, construction methods and allowable uses to support licence holder's business of trapping.
4. Minimize adverse impacts on public lands, wildlife habitat and viability of other business sectors.
5. Establish an inventory tracking of trapline structures with location and contact information for the purposes of wildfire safety, compliance and managing the intensity of all activities on public land.
6. Provide guidance when decisions are required by the department for structures that:
 - a. are not compliant or associated with the RFMA,
 - b. are not being used for the purpose of commercial trapping, and
 - c. do not align with the standards as defined within this document.

Location of Structures:

Structures required for trapline activities must be located so as not to cause disturbance to the land. Trapline structures are usually located in already established clearings with good access. Should an increased footprint or level of occupation become more apparent, the activity may not be authorized as per the *Public Lands Act*.

- All structures supporting trapline activities must be located within their respective RFMA. Special authorization may be granted by the department for existing structures outside of a RFMA if proper justification is provided for review.
- An application for the approval of trapline structures is required to be submitted to the department that ensures structures and activities align with the standards as defined within this document.
- Senior Licence Holders must provide a legal land location and Global Position System (GPS) coordinates to identify the general location of the site and the central point of structures, including cabins and associated structures, within the RFMA.
- Structures must be a minimum distance of 30 metres from a body of water.

- Within the RFMA, three cabins are permitted; one main cabin and two line cabins unless the RFMA is larger than 28,000 hectares (approximately 3 standard townships); the department may, with justification from the RFMA Senior Licence Holder, authorize an additional line cabin per incremental township.
- Trapline structures must be located more than 16 kilometres away from other trapline structure locations within the same RFMA. This minimum distance accounts for 1 day of travel on foot between cabins to ensure safety of the trapper.
- The Senior Licence Holder of an RFMA is responsible for and must account for all structures under the RFMA and manage them according to these standards. Cabins must be identified as a main or line cabin depending on its footprint. Structures that are not identified under RFMA will be considered unauthorized and therefore subject to potential enforcement actions as carried out by the department.
- Structures incidental to cabins (e.g., latrines, work sheds) are permitted as per the defined standards within this document.

NOTE: Senior RFMA Licence Holders who wish to build structures within a Provincial Park must apply for disposition through Parks Division and align with Parks' standards for structures being used for the purpose of supporting a trapping business.¹

Footprint Standards:

The footprint required for trapline activities must be managed to ensure structures are only constructed for trapline purposes which will cause minimal disturbance to the land. Should an increased footprint or level of occupation become more apparent, the activity may not be authorized as per the *Public Lands Act*.

- All structures must be single-story and constructed in a temporary manner allowing for movement or removal. Construction using concrete, piling or other permanent foundations is strictly prohibited.
- Structures identified as a Main cabin must be no larger than 53.31 m² (576 ft²) with an allowed covered deck no larger than 9.3 m² (100 ft²) within a cleared area no larger than 1 acre.
- Structures identified as a Line cabins must be no larger than 23.78 m² (256 ft²) with an allowed covered deck no larger than 4.64 m² (50 ft²) within a cleared area no larger than 0.5 acre.
- One work shed and one latrine is permissible for a main cabin and for each line cabin.
 - A work shed must be no larger than 13.38 m² (144 ft²) and within the cleared area specified for cabin.
 - A latrine must be no larger than 1.67 m² (18 ft²) within the cleared area specified for cabin.
- The installation of utilities or services such as permanent power lines, natural gas supplied by a commercial power operator, and water supplied directly by a municipality, are prohibited.

¹ Program Policy for Managing Fur Trapping in Alberta's Parks and Protected Areas (Sept, 2003)

Table A summarizes the size requirements for permitted structures.

TABLE A

Structure Type	Number of structures permitted	Maximum Cleared Area Permitted	Size of Structures	Covered Deck Allowance	Setbacks from bodies of water
Main Cabin	1 per RFML	0.405 ha (1 acre)	53.51 m ² (576 ft ²)	9.30 m ² (100 ft ²)	30 metres
Line Cabin	2 per RFML	0.2 ha (0.5 acre)	23.78 m ² (256 ft ²)	4.64 m ² (50 ft ²)	30 metres
Work shed	1 per cabin	On same site as cabin.	13.38 m ² (144 ft ²)	Not Permitted	30 metres
Latrines	1 per cabin	On same site as cabin.	1.67 m ² (18 ft ²)	Not Permitted	30 metres

NOTE: Senior Licence Holders with existing structures in place prior to these standards are still required to meet the standards as defined within this document. For any structures that do not meet the standards, the Senior Licence Holder is responsible to notify the department's regional Approvals Program staff with a location and description for discussion as to how the Senior Licence Holder can come into compliance. A possible exemption may be granted as decided by the department though the issuance of an authorization, based on justification provided by the Senior Licence Holder. The department makes no guarantee that an exemption will be awarded.

Authorization Procedures:

Existing and new structures must be authorized under the name of the Senior Licence Holder. On Public Land as administered by the Department, authorization will be initiated through the submission of a completed Trap Line Cabin Application Form (TLC-A). The Senior Licence Holder of an RFMA is responsible to identify every trapline structure being utilized for the purpose of trapping within their RFMA. A TLC-A will be required at the time when; a RFMA² is awarded or assigned, prior existing trapline structures require authorization, new trapline structures are desired or when a trapline structure authorization expires. (refer to Appendix for an example of form TLC-A)

New or existing structures are to be located within the RFMA and must minimize any potential for land-use conflicts with other users and impacts to sensitive features, public land and resources. New structures that do not align with the standards of this directive are prohibited. Senior Licence Holders must disclose and discuss all existing and proposed structures within the RFMA with department staff using the Trap Line Cabin Application form TLC-A. Existing and new structures must be authorized under the name of the Senior Licence Holder.

Wildfires may pose risk to trapline structures. Following the guidelines identified within the Homeowners FireSmart Manual may help protect trapline structures from wildfire. Trappers are encouraged to gain more information from the Government of Alberta website.

The following information must be provided for every trapline structure being utilized or proposed within the RFMA for review by the department:

- 1 Provide a sketch of all structures under the RFMA, including; delineation of the site area, any supplemental structures, with a north arrow indicator. Add photos of existing structures (if they already exist),

² Application and Issuance of an Authorization, PLAR Section 11(5) and 12(4) respectively.

- 2 A legal land location and Global Position System (GPS) coordinates at the structures' center are required to identify the general site and structures location within the site,
- 3 Designate which sites contain the Main and/or Line cabins,
- 4 Identify the year the trapline structure(s) were built (if exact date is unknown, estimate the date of construction),
- 5 Describe current use of cabin(s),

Where the Senior Licence Holder of an RFMA has an existing cabin(s) and would like to add a new cabin, the licence holder must;

- 1 Adhere to the standards identified within this document,
- 2 Clarify the designation of the new cabin, and correct any designation of any existing cabins, as a main or line cabin, depending on its footprint,
- 3 If new cabin is to replace an existing cabin, provide a plan to departmental staff of how the Senior Licence Holder plans to dispose or remove the existing cabin, prior to the authorization of any new cabin,
- 4 Provide proof of the disposal or removal of the existing cabin as per the approved plan,

Application and Issuance

The department staff will evaluate new requests and existing structures and determine the appropriate actions including:

- a. Accept or reject the TLC-A form within 30 days of receipt. Regional Resource Management staff and Approval Program staff will work closely together during this process;
- b. Regional Approvals staff will review the TLC-A within 90 days of accepting the authorization form. Approvals staff will advise the Senior Licence Holder within this timeline of any required additional information or changes.
- c. Regional Approvals staff will render a decision regarding issuance or refusal of the application and apply the appropriate terms and conditions;

Authorization Term

During the issuance of an authorization, a term is identified that defines how long the authorization will be in effect. Once the term expires, the Senior Licence Holder will be responsible to make application for authorization of the trapline activities. This ensures that any changes to the sites or to trapline business relationships that may have occurred during the previous term can be addressed on a regular basis. The average term that should be assigned to a Trapline Cabin authorization is up to 5 years in alignment with the RFMA term, however, depending on when the request is submitted to the department, the reviewing officer has discretion for issuance of a longer term. In any case, the term is to coincide with the renewal timelines of the RFMA.

Operating Requirements

To sanction the need and use of a trapline structure, certain parameters and requirements must be met. Below is a list of requirements that must be considered when making application for a trapline structure;

1. Structures are to be used solely for activities associated to the business of trapping.
2. Structures are not to be used for personal recreation or for the purpose of tourism.

3. Structures that may occupy a Forest Management Agreement (FMA) or Grazing Lease (GRL) require the consent of those holders prior to issuance of an authorization. The Senior Licence Holder is required to discuss opportunities to integrate and coordinate trapping activities into other uses of the land, structures, access, and timing of activities.
4. Trapline structure locations must be visually identified on the site year-round with the RFMA number and the TFA authorization number identified on the cabin structure.
5. Trapline structures cannot be occupied for longer than 180 non-consecutive calendar days in any one year.

Review Considerations:

Where an application for a trapline structure does not align with the identified standards or operating requirements found within these procedures, or there is a land-use conflict, the department can:

1. Decline the new structure.
2. Work with the applicant and provide guidance in aligning with the standards as defined within the directive for new applications and existing structures.
3. For existing structures, the department may;
 - a. grant an exemption and issue an authorization where justification is provided and the structure falls into the following size ranges,
 - i. structures are not larger than 62.81 m² (676 ft²) for main cabin or 28.42 m² (306 ft²) for line cabin, and have minimal impacts on:
 - public land,
 - natural resource values and
 - other users,
 - b. work with the Senior Licence Holder to bring their trapline structures into compliance through the relocation, modification or removal of structures, after which an authorization may be granted.

Where there is non-compliance that cannot be mitigated or an inappropriate use of public land, or where the department has determined that the location or use of the structure has negative impacts on public land, natural resource values, or other users, the department may require the trapline structure(s) to be removed. The applicant will be responsible for the removal and any associated costs, as in discussion with the department.

Additional Considerations:

Trapline structures that have been authorized by the department and align with the standards in this document or have been exempted, are directly associated to the ongoing issuance of the RFMA. Should any of following situations occur, the appropriate action(s) will need to be undertaken;

Situation Affecting Change:	Action Required:	By Whom:	When:
Changes to the Trapline structures are desired,	An application to the department is required.	Senior Licence Holder	Prior to construction.
Changes to the Trapline structures occurred without prior approval and authorization,	Disclosure to the department of the non-compliant activity needs to occur.	Senior Licence Holder	As soon as they become aware of the non-compliance.
The RFMA is transferred to another party.	An application for any existing structures must be submitted to the department, or	New Senior Licence Holder	As soon as transfer of RFMA is guaranteed.
	The structures must be removed,	Previous Senior Licence Holder	As soon as transfer of RFMA is guaranteed. A removal strategy can be discussed with and approved by the department.
The RFMA is cancelled.	All structures relating to the RFMA must be removed,	Senior Licence Holder	As soon as cancellation of RFMA is decided. A removal strategy can be discussed with and approved by the department.
The RFMA is amended.	Any authorizations issued under the previous RFMA may require amendment or updating. Contact with the department is required to discuss if any changes are required.	Senior Licence Holder	As soon as amendment of the RFMA is decided.

Other Considerations for Existing Structures:

Where a structure(s) already exist without authorization and are only partially associated to a RFMA, the department will consider the following:

1. Structures being used for the business of trapping **and** tourism activities:
 - a. These structures require the issuance of a formal disposition for commercial use. The Senior Licence Holder will be required to make application for the appropriate formal disposition as per the identified standards and pay relevant fees.
 - b. Upon review of the application, should the formal disposition be refused, the applicant will be required to remove the structures.
2. Structures within the RFMA that are **not** being used for the business of trapping as identified by the Senior Licence Holder and not otherwise approved are not authorized and therefore to be removed.
 - a. Structures used for personal interest are not permitted.
 - Use of Public Land for Non-Commercial Personal Residential and Recreational Structures

Compliance

Structures that contravene these procedures may be subject to compliance actions as outlined in the *Public Land Act*.

Existing and new structures are required to meet the standards as defined within these procedures. Routine inspection of crown land will occur and any cabins not authorized will be subject to compliance actions under the Act.

For any structures that do not meet the standards, the Senior Licence Holder must disclose this information to the Department's Approvals Program staff including the location and description of the structure. Department staff will evaluate and possibly investigate each situation to determine appropriate actions required.

Definitions

- "Act" refers to the *Public Lands Act*;
- "Authorization" means an instrument, other than a formal disposition or an approval, by which an authorization under section 20(1)(c) of the Act is granted;
- "Body of Water" means a permanent and naturally river, stream, watercourse or lake;
- "Cleared area" means the forested area that immediately surrounds a cabin, in which the trees and shrubs can be removed to create a clearing;
- "Footprint" means the impact or extent of a disturbance on public land and includes the intensity, frequency and nature of any uses or activities related to the disturbance;
- "Formal disposition" means a disposition issued under the Act before or after the coming into force of the Regulation under section 1(o);
- "Global Position System (GPS) " means the satellite-based navigation system retrieved from a GPS receiver;
- "Improvements" means the act of making an addition or change that makes something better or more valuable;
- "Latrine means a structure with pit used for human and organic waste; no toxins permitted;
- "Line Cabin" means a structure used as seasonal residence for safety that are secondary to a main cabin;
- "Main Cabin" means a structure used as seasonal residence for sole purpose of operating a trapping business;
- "Partner" means, under the Wildlife Regulation (AR 143/97) and in respect of a specific registered fur management area, an individual, if any, who is a party to an extant valid written agreement with a senior licence holder who holds a registered fur management licence – senior licence holder in respect of that area, which agreement
 - (i) approves the individual's becoming a partner and holding a registered fur management licence – partner in respect of that area, and
 - (ii) carries a current approval from an appointed officer;
- "Regulation" refers to the *Public Land Administration Regulation*;
- "RFMA" means, under the Wildlife Regulation (AR 143/97), Registered Fur Management Area
- "Setback" means the distance between the structure and the body of water's bank line.
- "Temporary Structure" means the location of structures and materials used in the structure that permits the ease of relocation or removal within 48 hours.
- "Trapping" means, in this directive, commercial trapping.
- "Work shed" means a structure for storage of wood, supplies, and equipment.