State of Rhode Island ALWTRT efforts and proposal.

RI's Principal Investigator has been a member of the Atlantic Large Whale Take Reduction Team (ALWTRT) since the team was fist convened. Substantial efforts to work with commercial fishermen to address entanglements and mortalities in fixed gear throughout the Northeast region have been ongoing. In 2005, The Rhode Island Division of Fish & Wildlife (RIDFW) applied for funding assistance from the National Fish & Wildlife Foundation (NFWF) to conduct a fixed gear survey to assess the number and configuration of fishing gear utilized by Rhode Island (RI) fishermen that are likely to adversely impact endangered whales. The grant award was received in April of 2006, funding was received in October of 2006 and the project was initiated.

Surveys were mailed out to all RI commercial fishermen (n=1080) who possessed a license which allowed them to fish fixed gear (pots & gillnets) in 2006 regulated under the Atlantic Large Whale Take Reduction Plan (ALWTRP), to determine primary gear type, level of activity and gear characteristics. Additionally, RIDFW incorporated sea sampling efforts onboard lobster and gillnet vessels to gain further information on these fisheries in RI nearshore waters and the offshore lobster pot fishery in Hudson Canyon. RI catch & effort harvester logbooks and the National Marine Fisheries Service Vessel Trip Reports were also analyzed to quantify number and types of gear.

RIDFW developed a survey to reflect local fixed gear fisheries and areas of gear concern as identified by the ALWTRT which were distributed to Rhode Island Fishermen in all ports,
Under the RI license structure, one of the categories of licenses issued allows fishermen to fish multiple gear types, and prosecute multiple regulated species and fisheries. Therefore, it was difficult to obtain fine-scale data on fishing activity and specific gear types. Gear surveys were developed specifically for lobster, gillnet and fish pot fisheries, to characterize participation in each fishery and mailed to all RI license holders who were licensed to potentially fish those gear types. 1,080 surveys were mailed, the response rate was 45% for lobster/fish pot holders, and 22% for gillnet license holders.

The State of Rhode Island did not submit a formal proposal to the NMFS or the Atlantic Whale Take Reduction Team at the January 2012 meeting. More information and clarification on the co-occurrence model and analysis was needed and expected to be presented at the January 2012 TRT meeting. Since the ALWTRT meeting, the State of Rhode Island has the following comments and proposal.

1. NMFS Northeast Proposed Management Measures

- Trawling up – The State of Rhode Island has substantial seasonal lobster and fish pot fisheries which take place during late spring and summer months in the inshore State waters zone from 0-3 miles. These fisheries are prosecuted by small vessels, usually single handed. The NMFS proposal would institute the prohibition of single pots and require trawls to have three pots per trawl and one vertical line. Three pot trawls are not an option for these small boat fisheries and pose a significant safety concern. Single pot fisheries usually deploy pots before another one is hauled. There can be little room for additional pots and ground line during the fishing operations. It would seem that this measure would be unlikely to have an impact on large whale entanglements as this area has a very low co-occurrence score based on 2009/2010 Northeast Baseline co-occurrence analysis. There are also no known serious injury or mortality events in Rhode Island State waters attributed to single pot fisheries. The State of Rhode Island will seek further exemptions if the prohibition on single pots in the very nearshore waters is adopted.
- The Rhode Island fixed gear fishing fleet is a wide diversity of vessel sizes and operations. As previously stated, the fleet is comprised of vessels from wood bottom skiffs measuring 18 feet in length to greater than 50 foot inshore/mid shelf vessels and everything in between. There are a number of mid range vessels that have tailored their operations based on the vessel's capability to haul and transport gear to and from their fishing grounds which can be from the immediate shore to offshore fishing grounds. The NMFS Northeast proposal for LMA 2 (12+) would require 20 twenty pot trawls. There are small vessels that fish this distance from shore but can not accommodate large trawls due to space and safety concerns.
- The State of Rhode Island had concerns with the gear complexity issue of trawling up. The fact that trawls will become more heavy and difficult for large whales to shed if an entanglement

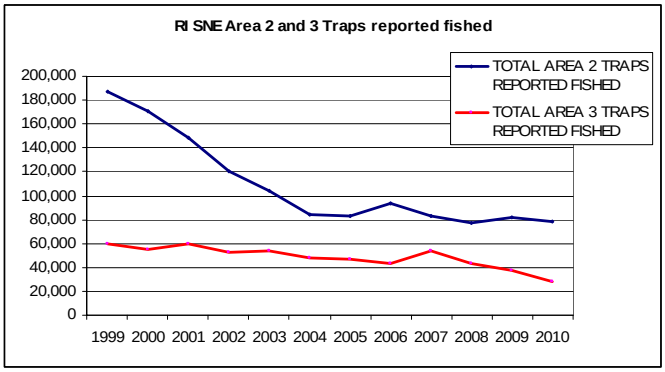
should occur, is a serious concern that may undermine the reduction in vertical lines in areas were the co-occurrence score is low.

The problems stated above would create few options for industry to safely meet the objectives of the Large Whale Plan as proposed by the NMFS in the Northeast Proposal.

State of Rhode Island Proposal for Vertical Line Reduction in Fixed Gear Fisheries.

The State of Rhode Island offers the following measures for consideration to mitigate the risk of mortality or serious injury to large whales from vertical lines.
-Under the NMFS Northeast Proposed Management Measures, a change in the exempted waters from Narragansett Bay and the South Shore Coastal Ponds to include all Rhode Island State waters which would allow for seasonal single pot fisheries
- Under the NMFS Northeast Proposed Management Measures, decrease the minimum number of traps / trawl from 20 to 15 in LMA2 (12+).
- Continue development of the Atlantic States Marine Fisheries Commission Addendum XVIII to the Interstate Management Plan for Lobster which reduces the number of traps in LCMA 2 to greater than 50% in the six years through active and passive reductions in traps. It is realized that a 50 % reduction in the number of traps fished may not equate to a similar reduction in vertical lines however, it is anticipated that the goal of the NMFS Northeast Proposed Management Measures will be meet. See attachment

Currently the State of Rhode Island is working with representative from Industrial Economics to better define inshore trap fishery gear configurations through the analysis of trap allocations, permit type, vessel size and trip data. This will allow IEC to run the co-occurrence models with a higher resolution of fixed fishing gear by area. i.e. State / Federal waters. We believe assumptions made in the co-occurrence model have inaccurately characterized the State's fixed fishery fishing gear. Therefore, based on updated inshore trap configurations, the State of Rhode Island is requesting the above modifications to the NMFS Northeast Proposed Management Measures.



Trap Consolidation Proposal for Area 2 and Area 3

Background and Rationale

The ASMFC Lobster Management Board has approved past addenda governing Area 2, 3 and OCC trap fishing that allocated traps to each permit holder based on past performance. These trap allocation programs contained provisions which allowed transfers of trap allocation among eligible permit holders to mitigate some the negative effects of trap allocation schemes. These programs are often called ITT's: Individual Transferable Trap programs. However, despite industry's hopes for trap allocation transfers, they have yet to be enacted, primarily because NMFS and RIDEM have met administrative challenges trying to implement these programs.

The recent effort reduction proposals put forth by LCMT's from Areas 2 and 3 are designed to mitigate some of the anticipated unintended consequences of trap allocation transferability programs that are expected to come "on-line" in the months ahead. The proposals will also accomplish long-term effort reductions (allocated traps) in certain LCMA's that feature excessive permits and trap allocations, especially in Southern New England where the stock is declining.

The proposal creates a framework that allows for LCMA-specific long-term reductions in trap allocations with constraints on how quickly a permit holder can escalate on their trap allocation after a transfer occurs.

Through Addendum 12, it was understood by the Board and NMFS that before transfers would be allowed or resumed, NMFS must adopt complementary rules to allocate traps for federal permit holders in Area 2 (and OCC) and a joint state/federal database must be created to track trap allocations and transfers among the permit holders for these three areas. NMFS is currently in rulemaking and held public hearings in spring of 2010 to consider federal rules that would allow trap allocation transfers among Area 2, 3, and OCCLMA permit holders as well as establish complementary Area 2 and OCCLMA trap allocations for federal permit holders in these areas.

It is expected that the trap allocation transfers could happen by 2012. When the program commences, industry members anticipate a rash of transfers that could in fact raise the effort level (traps fished) in the fisheries – despite the 10% conservation tax to be placed on transfers. If the net result is increased effort, then conservation goals would be compromised, at least temporarily.

The long-term goals of the newly proposed effort control plans are to reduce trap allocations for all permit holders on a set schedule. Area 3 representatives have proposed a 2.5% reduction annually for ten consecutive years. (These reductions will be in addition to the previous cuts that all permit holders have been subject to during the past decade). Area 2 representatives have discussed similar action as well as more aggressive trap allocation cuts to address the declining stock and habitat contraction that have occurred (e.g. loss of fishery in much of Buzzards Bay, and portions of Narragansett Bay). A potential trap allocation cut of 50% was approved by the Board in March 2011. If enacted, these cuts in

trap allocation will eliminate latent (un-fished) trap allocation and will undoubtedly reduce the number of traps actually fished.

Industry members who fish in the southern New England stock area recognize that the decline in lobster abundance and the potential for future offshore industrial development could constrain the fishable areas and reduce future landings to unforeseen low levels. In the absence of government funds to remove permits or trap allocation from the available pool, the proposals are essentially an industry (self-funded) buy-out. Consolidation will occur as permit holders respond to the annual cuts by obtaining trap allocation from those permit holders who downsize their operations or leave the fishery.

While difficult to calculate and confirm for all areas and jurisdictions, it is estimated that the effort control plans allocated more traps than were being fished at the time of the allocation schemes were adopted. The effort control plan for Area 2 was adopted in the middle of the decade long decline in the fishery. Because the fishery was already seeing substantial attrition, the initial allocations in Area 2 and 3 created a pool of latent (unfished) trap allocation that could be fished in the future. The number of fishermen and traps fished was substantially higher in the late 1990's and continues to decline through the present day. Nevertheless, the proportion of trap allocation that is unfished is significant and growing. For example in the Massachusetts portion of Area 2, DMF estimates the trap allocations issued in 2007 (48,298) were about 36% higher than the traps fished in 2006 (35,410). Currently the number of traps actually fished has declined by 42% in just five years to only 24,885 in 2010.

The effort control plans in Areas 2 and 3 resulted in some amount of effort reduction at the permit holder level and at the aggregate fleet level. Many permit holders in Area 2 received an allocation of traps that was less than the level of traps they fished prior to the allocation scheme. Recall that the Area 2 plan relied on a combination of traps fished and poundage to allocate traps. Some permit holders with relatively low landings received a trap allocation that was lower than their reported traps fished. Until the Allocation transfer program is created these permit holders are frozen at their 5-year old trap allocation level without any means to increase their allocation.

Meanwhile many Area 3 permit holders have seen their trap allocation reduced by a series of addenda (Addendum 1, Addendum 4). These addendum imposed differential trap cuts on Area 3 fishermen based on the size of the original allocation. Fishermen with lower allocations were cut 10 %, while others with very high allocations being cut up to 40 %. As a general rule, most Area 3 fishermen had their historic allocations cut by approximately 30 %. .

So despite the scaling down achieved through the effort control plans, many in the industry fear the soon-to-be-approved transferability program could result in a flurry of transfers that will spike fishing effort. Industry members who envision improvements in the economics of the fishery are willing to undertake these trap reductions as long as the relief valve of trap allocation transfer is available to maintain a profitable fishery for the remaining participants.

LMA	ASMFC Approval	State Approval	NMFS Approval
Area 2	2006	MA - 2006 RI - 2007 CT- 2006	Pending
Outer Cape Cod	2003	MA - 2003	Pending
Area 3	1999	N/A	2003
Area 4	1999	N/A	2003
Area 5	1999	N/A	2003

Goal of the Proposal: The goal of this proposal is to right size the industry for the reduced status of the available resource, with an initial goal of reducing qualified trap allocation by at least 25 % over a ten year period of time. The goal may be different in each LCMA depending on the condition of the fishery and amount of unused traps in each area. A range of different trap reduction alternatives will be taken to hearing which range from 15-50 % of allocated traps. . If the Commission decided to adopt a more aggressive (larger) trap reduction strategy for a specific LCMA it may also combine it with an accelerated implementation schedule in that area.

Options to be considered at public hearing:

- 15 % trap reduction
- 25 % trap reduction
- 35 % trap reduction
- 50 % trap reduction

Preferred Alternative for Area 2: A 50 % cut in qualified (allocated) traps to be calculated from the original allocation baseline.

Preferred Alternative for Area 3: A 25 % cut in qualified (allocated) traps from the 2012 baseline. Note: As described in the introduction, Area 3 has already undergone a series of trap cuts over the last decade which has resulted in a 30 % reduction in allocated traps from the original historic allocation baseline. As a result, the proposed cut in traps of 25 % will mean that allocated traps for this area will have been reduced by 55 % (30% plus 25 %) when this program is completed.

Annual Trap Cut:

The trap allocations are the only aspect of the current regulations that provide a means and mechanism to allow the consolidation of the industry. The industry will need to right size itself to the available resource in SNE , which is about 50 % of its historic level according to the last assessment. The next assessment in 2014 may change our understanding on this issue so this is considered a provisional value at this time, and subject to changes due to improvements in the next stock assessment. The industry believes it critical to maintain the economic viability of a downsized fleet, so it is therefore necessary to gradually consolidate fishing rights on fewer vessels.

In order to facilitate this downsizing process each allocation of qualified traps will be reduced annually effective when trap transferability is fully implemented by the management agencies. This will allow some members of the industry to sell their allocations of qualified traps and exit the fishery, while others purchase traps and maintain full allocations. The key point being that the number of qualified traps in these areas will be reduced each year after implementation of this proposal and the remaining fishing rights will consolidate on fewer vessels. The annual trap cut will be assessed on both active and banked trap allocations, be LMA specific, with the annual trap reduction being permanently retired for conservation purposes.

Annual trap cut options to be considered at public hearing:

- 2.5 % per year
- 3.5 % per year
- 5 % per year
- 10 % per year
- 25 % per year
- Some combination of the above

Preferred Alternative for Are 2: A 25 % cut in qualified (allocated) traps in year one of this program followed by five years of 5% trap reductions. At the end of year six qualified (allocated) traps for this area will have been reduced by 50 % from the original baseline.

Preferred Alternative for Area 3: The preferred reduction for A3 being 2.5 % reduction in qualified (allocated) traps per year for ten years. At the end of year ten allocated

traps for this area will have been reduced by 55 % from the original baseline (30 % have already been cut and an additional 25 % will be eliminated due to this proposal).

Transfer Tax As indicated previously, the Commission, States, and NMFS are in the final stages of implementing a policy which allows qualified traps in Area 2 and 3 to transfer among license holders. In order to further downsize the fleet to the reduced status of the lobster stock in SNE, each transfer of traps will be assessed a conservation tax of 10 per cent. The tax will be assessed on all transfers including transfer between vessels in the same corporation. Individuals transferring traps will receive 90 % of the amount purchased or transferred, with 10 % being permanently retired for conservation purposes. Transferred traps will first be credited to the receiving entities banking account (discussed on Page 6) and released in accordance with the control growth (page 9) provisions of the addendum. Example: An individual purchases 110 traps from another company. A total of 100 traps will be credited to the buyers trap banking account and 10 traps will be permanently retired. Individual entities with A2/3 qualified trap allocations will be allowed to transfer all or portions of their allocation, provided the receiving entity has the appropriate lobster permit for that area, (State, Federal or both). Transfers of traps will only be allowed annually, and in accordance to a timeline and process specified by the regulatory agencies.

Transfer tax options to be considered at public hearing:

- 5 % per transfer
- 10 % per transfer
- 15 % per transfer
- 20 % per transfer
- 25 % per transfer

Preferred Alternative: The preferred transfer tax rate is 10 % on each transfer of qualified traps in Area 2 and Area 3.

Transfer of Traps: In regards to the transfer of traps, current rules allow entities to transfer full allocations of qualified traps from one owner to another in accordance with specific criteria in each State and /or in accordance with federal law. With one exception, the recipient in a transfer receives the same allocation as the original owner. So if an individual owns Area 2 federal tags, they receive Area 2 federal tags, or if the original owner qualified in two areas (say Area 2 and Area 3) then the recipient receives both allocations. The one exception to this rule is when a fisherman in one State transfers a full allocation of State/Federal traps to a fisherman in another State, in which case the recipient only receives the authorization to fish in federal waters. Example: A NY fisherman sells his 800 State/Federal trap allocation for Area 2, to a RI fisherman. The recipient therefore only receives authorization to fish the 800 traps in federal

waters. This rule was adopted to prevent the migration of traps from one State to another State. No State waters access is granted in accordance with this transaction. This is in essence the status quo at present.

ASMFC adopted addendum 12 in February, 2009, which specified new rules governing transferability. These rules have not been implemented by the States to date, pending adoption of compatible federal action. As stated previously, NMFS is in the process of adopting transferability for federal waters, so it is somewhat uncertain what will be adopted for federal waters at this time. The ASMFC addendum 12 rules, section 4.3.3.3 (page 11), state that " The recipient of a particle trap allocation from a permit in a multi-LCMA trap allocation must choose only a single LCMA that the trap allocation will be authorized to fish in; trap fishing privileges for the other areas will be forfeited". This rule essentially limits the acquiring vessel to selecting one fishing area, and is significantly different than the current status quo regulation. Given the time that has gone by since ASMFC addendum 12 was approved, and given the fact that the federal rules are uncertain at this time, the Commission is soliciting input on two transfer alternatives as follows in order to ensure that a full range of options get discussed at public hearing:

Transfer Options for Multi- area allocation:

- Current status quo. This option would allow the recipient in a transfer to retain all of the multi- area allocations(minus the tax) and thus change the language in ASMFC addendum 12;
- Select one area option: This option would require the recipient of multi- area traps to select a single area and permanently forfeit the fishing privileges in the other fishing areas. If this option were selected, the Commission would submit a request to NMFS to adopt similar restrictions in federal waters, and the addendum 12 rule would remain in place.

Trap Cap: One of the concerns expressed by both fishery managers and members of the industry is that uncontrolled transferability of traps will allow the excessive consolidation of qualified traps in Area 2 and 3. In order to inhibit this condition the industry has requested that specific trap caps be implemented in each area that will maintain the current character of a downsized fleet, while allowing existing participants to maintain their current business plans.

Trap Cap Options for Area 2: Each entity with an Area 2 allocation will be allowed to fish their active qualified trap allocation up to the following maximum number of traps per year.

Trap Cap options for public hear for Area 2;

- 600
- 800
- 1000

Preferred Alternative for Are 2: The maximum number of active traps fished in A2 will be capped at 800. A single entry may not exceed 800 active traps fished in this area. This area specific trap cap will remain unchanged during the effective timeline of the addendum, unless modified by a subsequent Board action.

Trap Cap options for Area3. One or a combination of the following:

- 1513
- 1800
- 2000

Preferred Alternative for Are 3: The maximum number of qualified traps fished in A3 will be capped at 2000. The maximum number of active traps fished by a single entry may not exceed 2000 in area A3. The A3 trap cap will be reduced annually in accordance to the following schedule for vessels fishing in the Southern NE and Georges Banks portions of A3.

Table 1: Maximum number of traps that can be actively fished in A-3:

Date	GB/GOM	SNE
2012	2000	2000
2013	1950	1950
2014	1901	1901
2015	1853	1853
2016	1807	1807
2017	1762	1800
2018	1718	1800
2019	1675	1800
2020	1633	1800
2021	1592	1800
2022	1552	1800
2023	1513	1800

Note: This trap cap assumes that NMFS will implement a 2000 trap cap with the next set of federal rules. If NMFS adopts a lower cap on traps the schedule will need to adjust accordingly.

Trap Banking: In order to allow maximum flexibility for industry members to plan and scale their business to the future fishery, both individuals and corporations, will be allowed to purchase and bank an amount of traps up to the ownership cap in each LMA. This provision will enhance the ability of a lobster business to plan for their future, with the added benefit that banked traps do not enter the fishery, except on a predictable schedule. Entities will also be able to purchase large number of traps in a single transaction vs. making numerous small transactions each year, which will reduce the administrative burden for the management agencies and industry.

Each entity with state or federal permit for A2 or A3 is entitled to establish a single trap banking account, for each vessel. Each banking account will be partitioned into two parts: one for A2 and one for A3. An individual who owns less than the total ownership cap in an area may purchase traps from another fishermen and deposit the allocation in his/ her trap bank account. An entities total of active and banked traps may not exceed the total ownership cap for an area. Traps in the account may not be fished until activated in accordance with the control grow provisions of the proposal. Release of banked traps would be subject to the provision noted below.

<u>Trap Banking options for public hear for Area 2;</u>

- No action (no banking allowed)
- Bank 400 traps
- Bank 800 (which is equal to active allocation for areas).

<u>Preferred Alternative for Are 2:</u> Allow individuals to bank 800 traps, not to exceed the ownership cap for the area.

Example, if the allocation in A2 is 800 traps, an individual could own and actively fish no more than 800 traps (active traps) , but also would be allowed to purchase and bank up to an additional 800 traps (banked traps) .

<u>Trap Banking options for public hear for Area 3;</u>

- No action (no banking allowed)
- Bank 396 traps
- Bank 900 traps
- Bank 2396 traps (which is equal to maximum ownership cap for area 3).

Preferred Alternative for Are 3: Allow individuals to bank up to the maximum ownership cap in Area 3 (2396). The ownership cap declines in accordance with the trap reduction schedule in the Table 1 below. .

Ownership cap for each Area: In order to inhibit the excessive consolidation of the industry in Areas 2 and 3, the addendum would implement a cap on ownership. Entities who own traps above the cap in each area would be allowed to keep their allocations of qualified traps but all transfer of qualified traps after the date of implementation would be subject to the cap.

Ownership cap for public hearing for Area 2;

- No action (no ownership cap)
- 1200 (800 active and 400 banked traps)
- 1600 traps (which is equal to 800 active and 800 banked traps).

Preferred Alternative for Area 2: An ownership cap of 1600 as follows:

Active Trap Cap	Banked Traps	Ownership Cap
800	800	1600

Ownership cap for public hearing for Area 3;

- No action (no ownership cap)
- 2396 traps
- 3600 traps

Preferred Alternative for Area 3: An ownership cap of 2396 which declines to 1800 as outlined in the table below:

Table 1

Area 3: Ownership Maximum for Area 3

Area 3				
		Ownership Maximum*		
Trap cuts	Date	Trap Cap	Banked	Maximum
Start	2012	2000	396	2396
1	2013	1950	386	2336
2	2014	1901	376	2277
3	2015	1853	367	2220
4	2016	1807	358	2165
5	2017	1762	349	2111
6	2018	1718	340	2058
7	2019	1675	332	2007
8	2020	1633	323	1956
9	2021	1592	315	1907
10	2022	1552	307	1859
End	2023	1513	287	1800

*Maximum equals total of banked and active

Controlled growth: The Area 2 and 3 LCMT's have expressed a desire to have flexibility to scale there business in a predicable manner in order for some individual to survive the exploitation reductions that are needed to rebuild the stock. This includes both the process of purchasing traps (increasing traps) and decreasing traps. The industry has also voiced the concern that they do not want the industry to change too rapidly. In order to balance these two conflicting concerns they have requested that the addendum include provisions that would limit the rate of trap increases that may result from the implementation of trap transferability. Controlled growth is intended to allow an entity to annually move traps from their trap bank account, and add them to their allocation of active traps per year, but at a predictable rate. . The controlled growth limitation applies equally to A2/3, so an individual can move up to 200 A2 traps from the bank account per year and an additional 100 A3 traps per year. The controlled growth provision will be effective in the same years that NMFS implements transferability, and

once annually thereafter. A full transfer of all qualified and banked traps will be exempt from the controlled growth provision of this addendum.

Controlled Growth options for public hearing for Area 2;

- No action (no restriction on growth)
- 100 per year
- 200 per year
- 300 per year
- 400 (which equals one half of the trap cap).

Preferred Alternative for Area 2: 400 traps per year.

Controlled Growth Alternative for Area 3:

Ownership cap for public hearing for Area 3;

- No action (no restriction on growth)
- 100 per year
- 200 per year
- 300 per year
- 400 per year
- 900 (which equals one half of the trap cap).

Preferred Alternative for Area 3: 100 traps per year

Area 3 Designation :

As part of the permit renewal process, NMFS will require fishermen with Area 3 permits to designate if they will fish in Georges Bank, Gulf of Maine, or the Southern New England portion of the Area 3 LCMA. The area selected will be noted on the permit. Fishermen will be bound by the most restrictive rules and trap allocations for the area that they sign into, and the designation will remain in effect for the entire fishing year. Fishermen will be allowed to change the area designation once per year as part of the annual permit renewal process, effective in the following year.

Annual Review and Adjustment Process: As part of the annual plan review process the ASMFC Lobster Board will review the performance of this program to ensure that it is meeting the goals of the program. The review will consider the number of traps transferred, the rate of transfer, degree of consolidation taking place, etc in each area.

After considering these factors, the Board will decide to either maintain the current regulations for another year, or modify the transfer tax rate in order to achieve the goals of the program. The transfer tax rate may be adjusted annually between the values of 5-20 %, and will become effective in the following year as part of the next tag issuance cycle.

Impact of Different Controlled Growth Rates

Year	100 per year 400 to 800		100 per year 500 to 1800		150 per year 500-1800		200 per year 500-1800	
1	400	500	500	600	500	650	500	700
2	500	600	600	700	650	800	700	900
3	600	700	700	800	800	950	900	1100
4	700	800	800	900	950	1100	1100	1300
5			900	1000	1100	1250	1300	1500
6		4 years	1000	1100	1250	1400	1500	1700
7			1100	1200	1400	1550	1700	1900
8			1200	1300	1550	1700		
9			1300	1400	1700	1850		
10			1400	1500				
11			1500	1600		9 years		7 years
12			1600	1700				
13			1700	1800				
14				13 years				

Definitions:

- **Qualified Trap Allocation:** Individual/Vessel/Permit holder (entity) in A2/A3 who previously received individual allocations of lobster traps based on State and or Federal qualifying criteria.
- **Annual Trap Cut:** An annual reduction in the basic trap allocation due to conservation considerations.
- **Active Traps:** Traps that can be actively fished.

- **Banked Traps:** Traps that are owned but may not be fished, and are held in a trap banking account. . An entity/individual who owns less than the total ownership cap in an area may purchase traps from another fishermen and deposit the allocation in his/ her trap bank account.
- **Trap Cap:** The maximum number of traps that an entity may actively fish in either A2/3 (Table 1).
- **Total Ownership Cap:** The maximum number of traps that an entity may own in an area, which is any combination of active and banked traps (Table 2);
- **Transfer Tax:** A tax assessed on all transfers of traps, with the exception traps moved from an individual entities trap bank account.
- **Controlled growth:** Process/rate by which an individual entity move traps from a trap banking account to be actively fished.
- **Partial Trap Transfer**: Need definition
- **Full Trap Transfer:** Need definition
- **Add definition of entity**