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## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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Scott Grosz and Jessica Karls-Ruplinger  
Clearinghouse Co-Directors

Terry C. Anderson  
Legislative Council Director

Laura D. Rose  
Legislative Council Deputy Director

### CLEARINGHOUSE RULE 13-067

#### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated November 2011.]**

#### **2. Form, Style and Placement in Administrative Code**

Regarding the two alternative bobcat hunting and trapping zones proposed in s. NR 10.34, the department should ensure that only one alternative is included in the finalized rule. Including alternative rule provisions in a rule submitted to the Rules Clearinghouse is unusual. The department should note its ability to obtain public input on its policy decisions prior to submitting a rule to the Clearinghouse. [See, e.g., s. 227.13, Stats.]

#### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. In the “related statute or rule” section of the analysis prepared by the department, the phrase “these proposed rules are not a response to recently enacted statutes” is confusing because the change to the opening day of elk hunting season in the rule is being proposed in response to a provision in 2013 Wisconsin Act 20. The department should remove this phrase or clarify its meaning.

b. Because s. NR 10.01 (3) (d) 1. expands bobcat hunting and trapping statewide, s. NR 10.01 (3) (d) 2., the existing rule provision regarding bobcat hunting in the “remainder of the state”, should be repealed.

c. Based on the repeal and recreation of s. NR 10.37, is it necessary for the department to provide more information on its “Zone X” for elk management, or revise its references to the zone, considering that s. NR 10.37, as recreated, no longer refers to the zone, as indicated in s. NR 10.111 (3) (b)?

