



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz and Jessica Karls-Ruplinger
Clearinghouse Co-Directors

Terry C. Anderson
Legislative Council Director

Laura D. Rose
Legislative Council Deputy Director

CLEARINGHOUSE RULE 13-052

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

a. Throughout the proposed rule, proper spacing should be used in citations. For example, “NR 10.01(1)(b)” should read “NR 10.01 (1) (b)”. [See the example following s. 1.03 (1), Manual.]

b. In s. NR 10.01 (1) (b), the “Daily Bag Limit” for wild duck appears to be the same in each zone. Would it be clearer to establish a single statewide bag limit?

c. In s. NR 10.01 (1) (g) 1. d., use of parentheses should be avoided. [s. 1.01 (6), Manual.] Is the material in the parentheses substantive in nature? Should the material be placed in a note?

d. In s. NR 10.01 (1) (g) 3., the following headings appear to have been omitted: Locality; Open Season; Daily Bag Limit; and Possession Limit.

e. Throughout the proposed rule, the department should confirm that cross-references conform to the style prescribed by s. 1.07 (2), Manual. For example, the reference to “par. b.” in s. NR 10.01 (1) (g) 1. e. should instead refer to “subd. 1. b.”

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

a. In s. NR 10.001 (9w), insert the word “a” between the words “as” and “separate”.

b. The department should consider revising s. NR 10.01 (1) (g) 1. e. for clarity. Subdivision 1. e. establishes a goose hunting season concurrent to a portion of the duck hunting season established in the Mississippi River Zone. It may be clearer to specify those dates in subd. 1. e. instead of referencing s. NR 10.01 (1) (b). Subdivision 1. e. could read as follows: "Begins on the Saturday nearest September 24 and continues for 9 days, followed by a 12-day split, and then reopens for a season total of 92 days." If this change is adopted, the remainder of the proposed rule should be reviewed for similar instances.

c. In s. NR 10.01 (1) (v), should the amended language read as follows: "the Saturday before the beginning of the open season established for the north duck zone by par. (b)"?

d. Section NR 10.32 repeals and recreates a map which indicates the boundaries of the north zone, south zone, and Mississippi River zone. It appears that the recreated map is identical to the repealed map. Is repealing and recreating this map necessary?