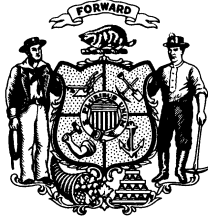


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CLEARINGHOUSE RULE 97-019

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

2. Form, Style and Placement in Administrative Code

- a. In SECTION 5, is there any reason not to create a new par. (e) rather than par. (an)?
- b. In SECTION 15, there is no reason to repeal and recreate s. NR 10.28 (intro.); the current introductory paragraph and the repealed and recreated introductory paragraph are identical.
- c. In SECTION 16, only s. NR 10.29 (map) need be repealed; the (intro.) clause need not be repealed and recreated.
- d. SECTION 21 creates a new section with only one subsection and only one paragraph within that subsection. When any section or part of a section is divided into smaller subunits, at least two subunits should be created. [See s. 1.03, Manual.]

4. Adequacy of References to Related Statutes, Rules and Forms

- a. In s. NR 10.01 (4) (an) 5., the description of locality should conclude with the phrase “not referred to in subs. 1. to 4.”
- b. In s. NR 10.145 (2) (a), the reference to s. NR 10.01 (4) should be to s. NR 10.01 (4) (dm).

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

- a. The department’s analysis of SECTIONS 6 and 7 fails to indicate how the rule strengthens the conditions of placement of and hunting over illegal baits.

b. In s. NR 10.07 (1) (g) 5., a comma should be inserted after the first occurrence of the word “dogs” and the last comma should be replaced by the word “or.”

c. In s. NR 10.40 (4) (a), it is assumed that the state-owned properties will not “conduct” the turkey hunts. The clause preceding the colon should be redrafted.

d. In s. NR 10.40 (4) (e), it is suggested that “spring” be stricken for consistency with par. (a) and that “at state parks” follow “hunts.”

e. In s. NR 15.015, the meaning of “thereon” is unclear.