

H B

404

Opinion

Governor's Bill Would Loosen Controls In Fish and Game Dept.'s Use of Poison

By JOE La ROCCA

JUNEAU — The Sheffield administration has quietly endorsed a controversial proposal to relax the use of poison to kill wild game animals, such as wolves, a proposition which has been consistently rejected by the legislature for nearly a decade.

The provision, which is buried deep within a 12-page bill introduced by the governor recently, would enable the boards of fisheries and game to promulgate regulations authorizing the use of poison to control wildlife population and predators.

Under existing law, the Dept. of Fish and Game cannot use poison to kill animals in Alaska unless it gets the written consent of either the board of fisheries or game for a specific, one-time application.

But the proposed legislation would give the department standing authority to use poison whenever and wherever it pleases, without consulting the boards.

The measure, House Bill

404, purports to be a housekeeping measure, designed merely to clarify and update the state's fish and game code.

For example, in his cover letter accompanying the bill, the governor told the legislature that the bill would "provide for the statutory clarification," and "correct some anomalies . . . by repealing outdated sections and clarifying ambiguities."

The governor added: "We have tried to eliminate all the controversial or unpopular provisions of versions of this bill introduced in earlier years."

But in fact, the bill — which the governor probably signed off on without reading — proposes a number of substantive changes in the fish and game code. The most egregious of them is the provision to relax controls on the use of poison for predator control and other purposes.

The current law, which has been on the books since 1968, was sponsored by former Gov. Jay Hammond, when he was a

member of the State Senate.

Prior to that time, the department had the same freedom to use poison for predator control which HB 404 now seeks to restore.

But because of controversy stemming from the use of poison to kill wolves in Southeast Alaska in order to protect diminishing blacktail deer herds here, then-Sen. Hammond pushed through the law now on the books prohibiting the use of poison without the explicit and written consent of what was then the Board of Fish and Game.

Ironically, during Hammond's second term in office, the Dept. of Fish and Game sought a bill similar to the one now pending which also masqueraded as a housekeeping bill making purely technical changes in the fish and game code.

But in fact, it proposed a number of substantive changes, including — without Hammond's knowledge or consent — the repeal of the clamp-down on the use of poison for predator

control authored by Hammond while he was in the Senate.

The cumulative effect of these proposed changes then, as now, was to increase dramatically the powers of the commissioner of fish and game, at the expense of the boards of fish and game.

The use of poison to control predatory species of fish and game is a legitimate management tool. But its use should be closely monitored by a broad range of decision makers.

Because of the powerful emotional impact its use gen-

erates, decisions to implement poison for predator control should not be left to the narrow discretion of fish and game specialists and technicians. Nor should it be used without public hearings each time its use is contemplated.

But under the bill introduced by the governor, both the broad decisional and public hearing processes would be circumvented. For these and other reasons, this unsavory provision in HB 404 should be killed, by poison or any other means at the legislature's disposal.

Bits
From
Bettye



By Sen. Bettye Fahrenkamp
Each year, as the session draws on and on, a ritualistic finger-pointing exercise ensues between the members of the

home is, another responsibility and concern of mine relates to the constant proliferation of regulations by the state govern-

State Publishes 1982 Mining Report

JUNEAU — A report summarizing mining activity in Alaska during 1982 has been released for public distribution.

penditures for exploration and development, and production statistics are reported.

The total value of 1982

Exploration expenditures, which are sensitive to general economic conditions, were predictably lower in 1982, falling

STATE OF ALASKA 1984 LEGISLATIVE SESSION
FISCAL NOTE

Revision Date: February 3, 1984

REQUEST

Bill/Resolution No.: CSSS HB 404
Title: Miscellaneous amendments
regarding Fish and Game
Sponsor: House Resources Comm
Requestor: House Resources Comm
Date of Request: Feb 3, 1984

FISCAL DETAIL

Agency Affected: Fish and Game
Program Category Affected: NRMEC
BRU, Program or Subprogram(s) Affected:
All

EXPENDITURES/REVENUES: (Thousands of Dollars)

	FY 84	FY 85	FY 86	FY 87	FY 88	FY 89
OPERATING						
100 PERSONAL SERVICES						
200 TRAVEL						
300 CONTRACTUAL						
400 SUPPLIES						
500 EQUIPMENT						
600 LAND & STRUCTURES						
700 GRANTS, CLAIMS						
800 MISCELLANEOUS						
TOTAL OPERATING	0	0	0	0	0	0
CAPITAL	0	0	0	0	0	0
REVENUE	0	0	0	0	0	0

FUNDING: (Thousands of Dollars)

GENERAL FUND						
FEDERAL FUNDS						
OTHER						
TOTAL						

POSITIONS:

FULL-TIME						
PART-TIME						
TEMPORARY						

SOURCE OF FUNDS TO OFFSET FISCAL IMPACT OF BILL:

ANALYSIS: Attach a separate page for analysis

Prepared By: Beverly Reaume

Phone: 465-4120

Division: Administration

Date: February 3, 1984

Approved by Commissioner: [Signature]

Date: Feb 3 1984

Agency: Department of Fish and Game

Distribution (by Agency preparing fiscal note):

- Legislative Finance
- Legislative Sponsor
- Requestor
- Office of Management and Budget
- impacted Agency(ies)

12/1/83

STATE OF ALASKA 1984 LEGISLATIVE SESSION
FISCAL NOTE

Revision Date: _____

REQUEST

Bill/Resolution No.: CSSSHR404(RES)
 Title: Misc. Amendments regarding
Fish & Game
 Sponsor: House Resources
 Requestor: House Judiciary
 Date of Request: 2-14-84

FISCAL DETAIL

Agency Affected: Public Safety
 Program Category Affected: _____
Fish & Wildlife Protection
 BRU, Program or Subprogram(s) Affected:
Fish & Wildlife Enforcement

EXPENDITURES/REVENUES: (Thousands of Dollars)

	FY 84	FY 85	FY 86	FY 87	FY 88	FY 89
<u>OPERATING</u>						
100 PERSONAL SERVICES						
200 TRAVEL						
300 CONTRACTUAL						
400 SUPPLIES						
500 EQUIPMENT						
600 LAND & STRUCTURES						
700 GRANTS, CLAIMS						
800 MISCELLANEOUS						
<u>TOTAL OPERATING</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
<u>CAPITAL</u>						
<u>REVENUE</u>						

FUNDING: (Thousands of Dollars)

GENERAL FUND	0.0	0.0	0.0	0.0	0.0	0.0
FEDERAL FUNDS						
OTHER						
<u>TOTAL</u>						

POSITIONS:

FULL-TIME						
PART-TIME						
TEMPORARY						

SOURCE OF FUNDS TO OFFSET FISCAL IMPACT OF BILL:

ANALYSIS: Attach a separate page for analysis

Prepared By: Paul Conger Phone: 465-4333
 Division: Administrative Services Date: 02/14/84
 Approved by Commissioner: *[Signature]* Date: 2/16/84
 Agency: _____

Distribution (by Agency preparing fiscal note):

- Legislative Finance
- Legislative Sponsor
- Requestor
- Office of Management and Budget
- Impacted Agency(ies)

12/1/83

STATE OF ALASKA 1984 LEGISLATIVE SESSION
FISCAL NOTE

Revision Date: January 11, 1984

REQUEST

Bill/Resolution No.: SSHB 404
Title: Miscellaneous amendments to AS 16: Fish and Game

Sponsor: Governor Sheffield

Requestor: House Resources Comm.

Date of Request: January 11, 1984

FISCAL DETAIL

Agency Affected: Fish and Game

Program Category Affected: NRMEC

BRJ, Program or Subprogram(s) Affected:

All

EXPENDITURES/REVENUES: (Thousands of Dollars)

	FY 84	FY 85	FY 86	FY 87	FY 88	FY 89
OPERATING						
100 PERSONAL SERVICES						
200 TRAVEL						
300 CONTRACTUAL						
400 SUPPLIES						
500 EQUIPMENT						
600 LAND & STRUCTURES						
700 GRANTS, CLAIMS						
800 MISCELLANEOUS						
TOTAL OPERATING	0	0	0	0	0	0
CAPITAL	0	0	0	0	0	0
REVENUE	0	0	0	0	0	0

FUNDING: (Thousands of Dollars)

GENERAL FUND						
FEDERAL FUNDS						
OTHER						
TOTAL						

POSITIONS:

FULL-TIME						
PART-TIME						
TEMPORARY						

SOURCE OF FUNDS TO OFFSET FISCAL IMPACT OF BILL:

ANALYSIS: Attach a separate page for analysis

Prepared By: Beverly Reaume

Phone: 465-4120

Division: Administration

Date: January 11, 1984

Approved by Commissioner: Chas. Belasewich

Date: 1-11-84

Agency: Fish and Game

Distribution (by Agency preparing fiscal note):

Legislative Finance

Legislative Sponsor

Requestor

Office of Management and Budget

Impacted Agency(ies)

12/1/83

STATE OF ALASKA
THE LEGISLATURE

POUCH Y - STATE CAPITOL
JUNEAU ALASKA 99811
907-465-3800

LEGISLATIVE AFFAIRS AGENCY

MEMORANDUM

February 3, 1984

SUBJECT: House Resources Committee substitute
for SSHB 404

TO: Representative John Ringstad and
Representative Richard Schultz
Co-Chairmen, House Resources Committee

FROM: Edward H. Hein *EH*
Legislative Counsel

1. The provisions of CSSB 101 (Resources) are merged into the committee substitute at sections 1, 6, and 15. (See attached sectional analysis of CSSB 101 (Res) for details of that bill).
2. Section 5 of the CS reverts back to the mandatory language of existing law, but allows a peace officer discretion to issue a citation or a warning when, in the officer's judgment, "it is in the state's best interest".
3. In section 8 (page 6, lines 26 - 27) and section 10 (page 8, lines 22 - 23), the CS reinserts "stocking" within the scope of regulations that may be adopted by the boards of fisheries and game.
4. The CS deletes amendments to AS 16.05.870(b) that appeared in section 17 of SSHB 404.
5. Sections 9 and 11 add new language that requires the boards of fisheries and game to provide a written explanation of reasons for rejecting proposals for regulations submitted to the boards.
6. Section 16 amends AS 16.05.495 to redefine the area covered by the vessel license exemption.
7. All other changes reflected in the CS are technical changes required by the legislative drafting manual.

EHH:ojb
J3/049

STANCLIFF

STATE OF ALASKA
THE LEGISLATURE

POUCH Y STATE CAPITOL
BUREAU ALASKA 99511
907-465-3830

LEGISLATIVE AFFAIRS AGENCY

MEMORANDUM

February 3, 1984

SUBJECT: Sectional analysis of CSSB 101 (Resources)

TO: Representative John Ringstad
Representative Richard Shultz
Co-Chairmen, House Resource Committee

FROM: Edward H. Hein *EH*
Legislative Counsel

Section 1 adds a new section, AS 16.05.165, to the fish and game code that provides that a peace officer investigating a misdemeanor violation of the code or a regulation adopted under it may issue a citation as provided in AS 12.25.180, notwithstanding the provisions of AS 16.05.160, which requires a peace officer to arrest any person committing a code violation in the officer's presence. Note that SSHB 404 would amend AS 16.05.160 to make such arrests discretionary, but would expand the arrest authority to include violations of all of AS 16 except AS 16.51 and 16.52. Section 1 also directs the supreme court to establish a bail schedule for fish and game misdemeanor violations and provides for paying fines by mail, similar to what is done with traffic tickets.

Section 2 amends AS 16.05.410, which provides for revocation of licenses for conviction of sport fishing and hunting license violations. The amendment provides that the existing revocation provisions do not apply to violations for which a forfeitable bail amount is established under AS 16.05.165. Two convictions of such an offense, however, could result in a peace officer filing a civil action to have the person's license revoked. A non-jury court hearing is required. If the court finds that the person's actions demonstrate a disregard for the preservation of the state's fish or wildlife resources, the license may be revoked for a mandatory one-to-three year period.

Section 3 amends AS 12.25.190(c) to provide that a person receiving a citation under AS 16.05.165 is not required to

Representative John Ringstad and
Representative Richard Shultz
Page 2
February 3, 1984

give a written promise that he or she will appear in court
in response to the citation.

EHH:ojb
J3/050



STATE OF ALASKA
OFFICE OF THE GOVERNOR
JUNEAU

January 17, 1984

The Honorable Joe Hayes
Speaker of the House
Pouch V
Juneau, AK 99811

Dear Representative Hayes:

Under the authority of art. III, sec. 18, of the Alaska Constitution, I am transmitting a sponsor substitute for HB 404, providing for the statutory clarification and reform of AS 16. HB 404 was introduced on May 6, 1983 (1983 Hse. Jnl., pg. 1211). The section-by-section analysis which accompanied the original HB 404 at the time it was introduced (1983 Hse. Jnl., pp. 1212 -- 1217), describes the effect of the bill and the reasons why the amendments contained in it would substantially benefit effective management of the fish and game resources of the state.

The attached sponsor substitute differs from the original HB 404 in only minor ways. It changes the title to a more appropriate one, and inserts the word "means" in sec. 10. It deletes the original sec. 14 (amending AS 16.05.-340(b)), since ch. 23, SLA 1983 corrected the problem addressed there, and the original sec. 26, because the amendment to AS 16.30.012 in that section was accomplished by ch. 123, SLA 1982. The remaining sections of the bill are renumbered accordingly. AS 16.05.632, mandating an identification system for crab pots, is deleted from the repealer section; the Board of Fisheries and the Department of Public Safety have determined that the repeal would not be appropriate since the board has concluded that pot limits are biologically justified, and department personnel can enforce pot limits. AS 16.05.-940(28) (the definition of "visitor") is deleted; in sec. 12 of the original HB 404 "nonresident" is used instead of "visitor," but the repeal of the definition of "visitor" was overlooked. Finally, the sponsor substitute adjusts some discrepancies between the language of current statutes and the language of the original HB 404.

We have tried to eliminate all the controversial or unpopular provisions of versions of this bill introduced in earlier years, and the sponsor substitute is consistent with that aim. I therefore urge your passage of this bill this year.

Sincerely,


Bill Sheffield
Governor

DEPARTMENT OF PUBLIC SAFETY
POSITION PAPER - CSSH B 404 (RES)

Support

The Department of Public Safety supports passage of CSSH B 404 (RES). This bill authorizes the Supreme Court to establish a bail schedule for specific misdemeanor offenses.

Under existing law, peace officers have the authority to issue citations for misdemeanors instead of arrest under AS 12.25.180, however, once a citation is issued, the offender must ordinarily appear in court, even if he does not wish to contest the charge. The Bill adopts a procedure similar to that found in the motor vehicle code (AS 28.05.151) which allows the offender to post and forfeit bail if he does not wish to contest the charge.

Passage of this will benefit both law enforcement and the person cited for relatively minor offenses. The person will avoid the time and expense associated with a court appearance, while law enforcement will be able to concentrate its resources on serious resource offenses.

An added benefit will be a reduction in offenses requiring action by the Department of Law and a correspondence reduction in the court calendars.


Robert J. Sundberg
Commissioner

SPONSOR SUBSTITUTE FOR HOUSE BILL 404
AN ACT MAKING MISCELLANEOUS AMENDMENTS
REGARDING FISH AND GAME

SECTION-BY-SECTION ANALYSIS

Sections 1, 3, 4, 5, 6, 19, and 21 would change the word "chapter" to refer to the appropriate chapters of AS 16 so that the powers and duties of the boards, commissioner and department, and definitions, apply to the appropriate chapters of that title. The Legislature enacted AS 16.05 in 1959. Some other old provisions were apparently overlooked, and, when new provisions were added, the various powers or obligations established in AS 16.05 should have been, but were not, amended to cover other chapters. This oversight has left gaps in the statutes which need to be corrected.

Section 2 would expressly authorize the Commissioner of Fish and Game to conduct research and enter into cooperative agreements and contracts.

In addition to cooperative agreements, it is also appropriate for the department to enter into contracts or to make grants for specific projects. Section 2 also would require the commissioner to establish criteria governing department grants and contracts to ensure that those expenditures are a wise use of public money.

Sections 4 and 5 would authorize peace officers to enforce the provisions of AS 16 except AS 16.51 and AS 16.52, and to arrest persons violating the fish and game title. Section 6 would permit the officers to execute warrants. The word "chapter" is changed to refer to AS 16 except AS 16.51 and AS 16.52, which relate to the Alaska Seafood Marketing Institute and the Fishery Industrial Technology Center, respectively, so that uniform enforcement procedures will apply to almost all of Title 16. Also, the requirement that offenders be brought before a magistrate "immediately" is dropped. This would delete an unnecessary burden imposed on protection officers. Finally, the mandatory requirement that deputies arrest all offenders is stricken because an arrest for certain minor violations may not be appropriate and could result in unnecessary expenditures for enforcement and prosecution.

Sections 7 and 9 set out the authority of the Board of Fisheries and the Board of Game, respectively, to set quota and bag limits. No express authorizations exist for harvest levels or sex and size limitations, even though regulations of this nature are basic to resource management and have been adopted based on interpretations of other board powers. That authority is made express in sections 7 and 9, as a legal safeguard.

Sections 8 and 11 would remove the authority of the boards to adopt regulations for engaging in biological research, since biological research is a departmental function.

Section 10 would amend existing law to reflect the true function of the Board of Game. Despite the current language of AS 16.05.255(a)(6), the board does not adopt regulations regarding investigation of predators, which is an administrative function of the department. The board does, however, establish methods and means and harvest levels for the taking of predators or other competitors through regulations.

Sections 12 and 14 would eliminate the burden upon sport fishing license vendors who must distinguish between long-term nonresidents and short-term sojourners when issuing 14-day and three-day licenses. The problem arose because the definition of "visitor" included only temporary nonresidents and did not include long-term nonresidents or those awaiting residency status. Thus a person who had not yet lived here for one year was required to pay the higher nonresident license fee, even if only a few days remained in a fishing season. The proposed change is fair and will be more efficient to administer.

Section 13 would make minor technical amendments to AS 16.05.340(a)(9), to clarify the meaning of existing law.

In section 15, language in AS 16.05.685(c)(2) which describes areas no longer used in the management of king crab would be deleted.

Section 16 would clarify AS 16.05.831(a) which was enacted in 1975 to prohibit the waste of salmon. That section now contains language that could be considered ambiguous, and thus reduce the law's effectiveness. The clarification expressly provides that no salmon intended for sale, whether to a private individual or a commercial buyer, may be wasted.

Section 17 would make grammatical changes in the anadromous fish protection statute to correct an apparent deficiency. Currently, only a person or agency desiring to use, divert, obstruct, pollute or change the flow or bed of an anadromous fish stream must first notify the commissioner. In order to make AS 16.05.870 more enforceable, notification would be required before beginning any activity which may change the stream or pollute the stream.

Section 18 would restrict the criminal sanctions in AS 16.05.900 to apply only to AS 16.05.870--16.05.895, relating to anadromous fish protection. The basic penalty section

for Title 16 would be moved to a new section (AS 16.05.925, contained in section 20 of the bill) under the "general provisions" article, where it more logically belongs.

Sections 19 and 20 deal with the basic prohibition of Title 16 that it is unlawful to possess fish and game unless permitted by a statute or a board regulation. This prohibition and the accompanying penalty are AS 16.05.920(a) and 16.05.900(a), respectively. Section 20 would set out the general penalty section separately in AS 16.05.920(a). Through apparent oversight which resulted from enactment of AS 16.20 well after enactment of AS 16.05, certain prohibitions were created by regulation without an enforceable penalty. The new AS 16.05.925 would provide a uniform penalty for the violation of a regulation adopted under AS 16.05 or AS 16.20. The penalty is made a class A misdemeanor, to conform with sentencing under AS 12.55.035 and 12.55.135. Also, sec. 19 of the bill changes "made" to "adopted," with regard to regulations, for the sake of consistent terminology.

Section 21 amends AS 16.05.940 which is the basic definition section for AS 16.05--AS 16.40. Four of the definitions contained in this section would be amended as follows:

(9) the definition of "fish" would be amended to include parts of the fish; this would affect enforcement, for example, when salmon roe is sold separately from the carcass;

(13) the definition of "fur dealing" would be rewritten for clarity and to correct punctuation errors;

(14) the definition of "game" would be amended to include reptiles; this would provide regulatory authority to control the importation of undesirable snakes and other reptiles into the state; and

(28) the definition of "visitor" would be repealed, which only appears in Title 16 in conjunction with the "visitor's special sport fishing license" in AS 16.05.340(a)(6); that designation would be changed by section 12 of this bill to "nonresident special sport fishing license."

Section 22 would add a criminal sanction for wasting herring. Existing law prohibits this waste but does not clearly specify a criminal penalty.

Section 23 would amend AS 16.10.280 to allow the department's determination of a price dispute to be based on an estimate of the number of fishermen involved. During a recent Bristol Bay price dispute, the department's role in setting up mediation was hampered by the need to actually

"certify" that one-third of the registered fishermen were involved in a price dispute, as provided under existing law. Given the information available, this is not always possible.

Section 24 would correct a technical error in the land description of the Susitna Flats State Game Refuge, established by ch. 140, SLA 1976.

Section 25 would amend AS 16.35.200 to require that the use of poison to kill an animal be governed by regulations adopted by the Board of Fisheries or Board of Game as appropriate. Currently only written consent of the appropriate board is required. The requirement of regulation will provide for full public comment. The use of poison within a building, or to kill rodents at dumps or landfills, is exempt from board regulation.

Section 26 would repeal the following laws:

(a) AS 16.05.251(a)(9) and 16.05.255 (a)(8). These provisions empower the boards to adopt regulations for cooperative agreements to promote research and education and to train persons for management. These are administrative functions and do not require board regulations. The repeal of these sections will permit the separation of the rulemaking functions of the boards from the administrative functions of the commissioner of fish and game.

(b) AS 16.05.903. This section, which created the Alaska Big Game Photo Contest, was enacted in 1975. The original intent was that the revenues from entry fees and the sale of a published volume of the winning photographs would generate enough money to pay for cash prizes and operating expenses. Unfortunately, the revenues from the sale fell far short--less than 20 percent of the costs were recovered during the first year. The 1975 legislation created public criticism of the department with respect to spending priorities and proper use of taxpayer's money. The repeal will not affect the continuation of the department's annual Wildlife Photo Contest.

(c) AS 16.10.230(1). This section provides exemptions to the unlawful taking of migratory fish and shellfish in high seas areas designated by the International Pacific Salmon Fisheries Commission. That commission no longer exists and enactment of the federal Fisheries Conservation and Management Act (P.L. 94-265) makes the other exemptions set out in the statute obsolete. Therefore, this subsection should be repealed.

(d) AS 16.15.010-16.15.090. This chapter created the Alaska Fisheries Experimental Laboratory, which no longer exists.

(e) AS 16.35.010--16.35.180. These sections relate to bounties which are no longer paid. The bounties on seals are in conflict with the Marine Mammal Protection Act of 1972, which preempted these state laws. In addition, AS 16.05.255 provides that the Board of Game may establish bounties through the adoption of regulations. The remainder these sections pertain to employment of trappers and hunters for predator control, and have become obsolete.

MANUAL
OF
LEGISLATIVE DRAFTING
1984

FOR THE USE OF LEGISLATIVE STAFF

Prepared
by

LEGISLATIVE AFFAIRS AGENCY

True exceptions should be few and very specific. They should be introduced with "except that," "but," or "However," or by starting a new sentence. If the exceptions could logically be grouped in a subsection or section apart from the general rule, it is useful to the reader for the drafter to introduce the general rule with language such as "Except as provided in (c) of this section (or AS XX.XX.XXX)...."

(h) "May," "shall," "must"

Use the word "shall" only to impose a duty upon someone. Use the word "must" when describing requirements related to objects such as forms or criteria. (Use "must" sparingly, however, because most sentences using it can probably be written more clearly to impose a duty on a person, in which case "shall" would be the proper word.) Use the word "may" to grant a privilege or discretionary power. Use the words "may not" to impose a prohibition upon someone. For a further discussion, see Dickerson, The Fundamentals of Legal Drafting (1965), pp. 130 and 131. For example:

The commissioner shall issue a license..., i.e., it is the commissioner's duty to do so.

The form must specify that..., i.e., the form is required to have something in particular on it.

The commissioner may inspect records..., i.e., the commissioner may if it is necessary or proper, but the commissioner is not obligated to do so.

The commissioner may not issue a license..., i.e., under the defined circumstances, it is beyond the power of the commissioner to issue the license.

A person may not operate a ... without a license..., i.e., under the circumstances, a person is not permitted to do the specified act without a license.

Do not use "must" or "shall not." Also, do not use the "No... may" construction; use "may not." For instance, avoid "No fish trap may be.. ," and use "A fish trap may not be...."

(i) Numerals

Numbers from one through nine are written in words only:

one, two, three, four, etc. first, second, third, etc.

Numbers over nine are written in figures only:

10, 11, 12, 13, 14, etc. 10th, 11th, 12th, 13th, etc.

When referring to money, use figures only: