

**Proposed Resolution #A**  
**Requires 2/3rd Majority**

**Submitted by:** Tim Kobasic on behalf of the Hiawathaland Trail Association  
**MUCC Region:** 1  
**Passed:** September 22, 2018 Conservation Policy Board Meeting  
**Title:** **RESOLUTION TO ASSURE FAIR AND EQUITABLE DISTRIBUTION OF FUNDS  
DERIVED FROM GAS TAX**

1 **WHEREAS**, under MCL Section 324.020 (1) the Recreation Improvement Account is established as an  
2 account within the Legacy Fund, and

3 **WHEREAS**, under Section 324.020 (2) The Recreation Improvement Account shall consist of both of the  
4 following: (a) All money in the Recreational Improvement Fund, formerly created in Section 71105,  
5 immediately prior to the effective date of the amendatory act that added this section, which money is  
6 hereby transferred to the Recreation Improvement Account, and

7 **WHEREAS**, under (b) the revenue (is derived) from the following sources: (i) Two percent of the gasoline  
8 sold in this state for consumption in internal combustion engines. And (ii) Other revenue provided by  
9 law, and

10 **WHEREAS**, under MCL Section 324.71101 (e) Recreational Projects are defined to mean, in addition to  
11 the activities provided for in this part, the construction, maintenance, and operation of trails and  
12 associated facilities that may be used by off-road vehicles, cross country skiers, horseback riders, and  
13 hikers, and inland lake cleanup grants as provided by part 309, and

14 **WHEREAS**, the Recreation Improvement Account (Fund) distribution matrix currently directs that 80% of  
15 said funds is dedicated for use in Waterways Recreational Projects, 14% is dedicated for use in  
16 Snowmobiling Recreational Projects and the remaining 6% is dedicated for all other uses (including  
17 motorized and non-motorized activities), and

18 **WHEREAS**, All-terrain Vehicles (ATVs) and Off-Road Vehicles (ORVs) by unit sales and gas tax revenue  
19 derived for the Recreational Improvement Account, now exceeds that produced by recreational  
20 watercraft (vessels) and snowmobile, and

21 **WHEREAS**, cross country skiers, horseback riders, hikers and bicyclists contribute zero direct revenue  
22 towards the Recreational Improvement Account, and  
23 **WHEREAS**, with expanded opportunity for recreational motorized riding along county, state forest,  
24 federal forest roads and limited access to highway trunk lines for connection, that there is certainty as to  
25 an increased need of dedicated funds for remuneration for maintenance and repair of the  
26 aforementioned roadways beyond the scope of current funding sources. NOW,  
27 **THEREFORE BE IT RESOLVED**, that Michigan United Conservation Clubs support and initiative to change  
28 the Michigan Recreational Improvement Account matrix of fund distribution to include only those  
29 entities that directly contribute to the account via the gas tax, and  
30 **BE IT FURTHER RESOLVED**, that the Michigan Legislature resolves to also amend the Michigan  
31 Improvement Account matrix of fund distribution to establish as fair and equitable sharing of said funds  
32 proportionate to the current economic impact by unit sales, and/or permit (license) unit sales, and/or  
33 impact on tourism for the State of Michigan, and  
34 **BE IT FURTHER RESOLVED**, that a percentage of all proportionate designated funds shall be put aside for  
35 all related remuneration needs and eligible for application and use by those county, state and federal  
36 and highway management agencies affected.

**Proposed Resolution #B**  
**Requires 2/3rd Majority**

**Submitted by:** David Van Lopik, Individual Member  
**MUCC Region:** 7  
**Passed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** Sport Shooting Ranges Protection Modernization Act

1

1 **WHEREAS**, Private property, agricultural areas and other public property such as the Department of  
2 Natural Resources shooting ranges and state game areas are limited in access, availability, safety  
3 features and location throughout the state for hunting, competitive and recreational shooting, and  
4 other firearm activities; and

5 **WHEREAS**, Conservation clubs, sportsmen’s clubs, rod and gun clubs, and other private firearms ranges  
6 (sport shooting ranges) have had substantial increases in memberships and usage by member and non-  
7 member events, and private and public entities (example: law enforcement, DNR hunter safety  
8 education, Whitetails Unlimited, Pheasants Forever, 4 H Shooting Sports, etc). This is due to increased  
9 interest in hunting, competitive and recreational shooting; and

10 **WHEREAS**, Local, county and state law enforcement agencies use sport shooting ranges for their  
11 firearms training due to updated and current safety features. These clubs and range locations are very  
12 cost effective or free to train and qualify officers with their firearms; and

13 **WHEREAS**, Existing sport shooting ranges need to expand their real property, update facilities,  
14 buildings and ranges without the fear of excessive and overburdening regulations, ordinances, zoning  
15 changes, and taxes; and

16 **WHEREAS**, Sport shooting ranges are often being targeted by individuals, local governing boards and  
17 other groups to stop activities or limit access to the facilities. These individuals, local governing boards  
18 and other groups create exorbitant legal and other financial costs to the clubs/ranges to defend against  
19 these nuisance complaints; and

20 **WHEREAS**, Existing and new sport shooting ranges are increasingly being pressured by local  
21 governments, township officials, zoning boards, tax assessors, planning commissions: to wit: increasing  
22 regulations by planning commissions, zoning board changes to current/existing zoning classifications,  
23 township, city, village and other local officials implementing new ordinances and/or now enforcing  
24 previously unenforced local ordinances, excessive regulations, and changing tax formulas and taxes.

25 NOW,

26 **THEREFORE BE IT RESOLVED**, That the Michigan United Conservation Clubs (MUCC) shall work with the  
27 state legislature to pass a law limiting or eliminating new and existing regulatory pressure aimed at

28 sport shooting ranges via local ordinances, prohibitive zoning changes and regulations, planning  
29 commission issues, regulations and changing tax formulas and taxes on new or expanding sport shooting  
30 ranges: Provided the sport shooting ranges meet or exceed nationally recognized range standards at  
31 the time of development on property they currently lease, own or purchase in the future. (Examples are  
32 the National Rifle Association Range Standards, or National Shooting Sports Foundation range  
33 parameters.) New buildings will meet existing building codes. Remodeled buildings shall meet building  
34 codes in existence when the original structure or structures were built; and  
35 **BE IT FURTHER RESOLVED**, That the Legislature update Michigan Law in regards to firearms ranges, and  
36 allow new and existing sport shooting ranges to work under the prior firearms range laws and noise  
37 ordinances AND enact new laws to protect existing ranges from the nuisance complaints, additional  
38 regulatory pressure, excessive local ordinances, prohibitive zoning changes and regulations, planning  
39 commission issues, regulations and taxes on new or expanding sport shooting ranges, and  
40 **BE IT FURTHER RESOLVED**, That the Legislature should also enact and/or create civil penalties for  
41 private citizen nuisance complaints made to any governmental entity toward a sport shooting range in  
42 which those complaints or issues are addressed by Michigan Law, or are based in Common Law.

**Proposed Resolution #C**  
**Requires 2/3rd Majority**

**Submitted by:** Mike Avery, Individual Member  
**MUCC Region:** 6  
**Passed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **EXPAND NUMBER OF RODS FOR TROLLING ANGLERS**

1 **WHEREAS**, state law (324.48703) restricts anglers to no more than three single rods and lines per  
2 person, and the Michigan Department of Natural Resources (DNR) has the authority to decrease this to  
3 two if needed; and  
4 **WHEREAS**, many fisherman who troll the Great Lakes and associated waterways would like to have the  
5 opportunity to put more lines in the water to maximize fishing opportunities; and

6 **WHEREAS**, there have been concerns in the past to expanding the number of lines for anglers fishing  
7 from the frozen ice, shore or fishing piers as crowding can become an issue; and  
8 **WHEREAS**, the regulation of size, daily bag and possession limits set by the Natural Resources  
9 Commission and also governed by the Great Lakes and Inland Consent Decree would be maintained,  
10 even with a higher rod and line limit; NOW,  
11 **THEREFORE, BE IT RESOLVED**, that Michigan United Conservation Clubs work with the Michigan  
12 Legislature and Michigan Department of Natural Resources to enact legislation to allow the DNR to  
13 expand the number of lines for trolling anglers.

**Proposed Resolution #D**  
**Requires 2/3rd Majority**

**Submitted by:** Paul Rose, MUCC Past President  
**MUCC Region:** 4  
**Passed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **UNATTENDED CAMERA USE (TRAIL CAMS) ON STATE-MANAGED LANDS**

1 **WHEREAS**, Michigan United Conservation Clubs (MUCC) has historically sought to ensure that new and  
2 emerging technologies used in the pursuit of fish and game and outdoor recreation will not adversely  
3 affect our outdoor heritage, and

4 **WHEREAS**, the use of unattended cameras (a.k.a. Trail Cameras) on public lands has increased  
5 significantly each year as both their cost and size have further been reduced, and

6 **WHEREAS**, an increasing number of reports have emerged in recent years that unattended and  
7 unidentified cameras are being observed in such places as public access sites, beaches, and recreation  
8 trails and other locations where their use would not appear to be intended as an aid in the monitoring  
9 of wild game, and

10 **WHEREAS**, the cost and size of these cameras is likely to continue to decrease as their technological  
11 capabilities increase which could potentially result in their further proliferation on public lands to a point  
12 where the outdoor experience becomes compromised, and

13 **WHEREAS**, this rise in number and distribution of unattended cameras increases the potential for  
14 incidents of inappropriate use which could negatively affect the public image of hunters and other  
15 outdoor recreationalists, and

16 **WHEREAS**, this increasing sense of “being watched” can undermine the quality of the outdoor  
17 experience on our public lands. NOW,  
18 **THEREFORE BE IT RESOLVED** that Michigan United Conservation Clubs (MUCC) work with the Michigan  
19 Department of Natural Resources to develop a policy for the use of unattended cameras (a.k.a. Trail  
20 Cameras) on State of Michigan-managed lands which seeks to limit their number and duration of use,  
21 and further require that each camera deployed include the name and contact information of the  
22 owner/user, and  
23 **BE IT FURTHER RESOLVED** that unattended cameras used for DNR-sponsored, or DNR-approved  
24 research shall be subject to a separate policy regarding their use.

**Proposed Resolution #E**  
**Requires 2/3rd Majority**

**Submitted by:** Paul Rose, MUCC Past President  
**MUCC Region:** 4  
**Passed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **MICHIGAN NATURAL RESOURCES COMMISSION APPOINTMENT CRITERIA**

1 **WHEREAS**, the Michigan Natural Resources Commission (NRC) is a seven-member public body whose  
2 members are appointed by the Governor, and  
3 **WHEREAS**, the Commission has exclusive authority to regulate the taking of game and sportfish, and is  
4 authorized to designate game species and authorize the establishment of the first open season for  
5 animals through the issuance of orders, and  
6 **WHEREAS**, no established criteria exists relative to the qualifications and eligibility of those who are  
7 appointed to the NRC, and  
8 **WHEREAS**, The Commission is to be composed of 7 members, not more than 4 of whom identify  
9 themselves as being affiliated with the same political party. NOW,  
10 **THEREFORE, BE IT RESOLVED**, that Michigan United Conservation Clubs (MUCC) work with the Michigan  
11 Department of Natural Resources and State of Michigan Legislature to develop qualification and  
12 eligibility criteria which seeks to populate the NRC with members who have a demonstrated interest in

13 both game and non-game fisheries and wildlife, natural resource management, a history of personal  
14 participation in these activities, and suitable educational and professional background, and  
15 **BE IT FURTHER RESOLVED**, that consideration for appointment be given to geographic distribution and  
16 the diversity of relevant recreational participation of its membership, as well as a balance among those  
17 who have a declared political affiliation, and  
18 **BE IT FINALLY RESOLVED**, that this emphasis on citizen participation should preclude the appointment  
19 of former employees of the Michigan Department of Natural Resources, Michigan Department of  
20 Environmental Quality (MDEQ), Michigan Department of Agriculture and Rural Development and  
21 members of the Michigan State legislature for a period of ten years subsequent to their most recent  
22 date of service or employment.

**Proposed Resolution #F**

**Submitted by:** Greg Peter, MUCC Vice President  
**MUCC Region:** 8  
**Proposed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **MANAGEMENT PRACTICES IN CWD AREAS**

1 **WHEREAS**, Chronic Wasting Disease (CWD) is an invariably fatal disease of a highly infectious nature,  
2 and  
3 **WHEREAS**, left unchecked, CWD has been shown to not only decimate deer populations as the incidence  
4 climbs inexorably higher, but CWD also depress the age structure of the population significantly, and  
5 **WHEREAS**, the possibility of contracting the disease increases with age and the incidence risk level in a  
6 population increases with the deposition of prion in the environment, and  
7 **WHEREAS**, controlling CWD is complicated by this persistent environmental contamination with the  
8 responsible prion being shed from infected deer well before they show signs of infection, and

9 **WHEREAS**, the persistence of the prion in the environment results in an increased indirect transmission  
10 rate as the disease becomes endemic and the presence of infective prions increases with the density of  
11 the deer population, and

12 **WHEREAS**, direct transmission is also facilitated by concentrating the population on the landscape  
13 (density of susceptible deer) either by baiting or confinement, increases the risk of both direct and  
14 indirect transmission, and

15 **WHEREAS** in the CWD Management Zone, where current deer densities are high, current NRC/DNR  
16 regulations remove the antler restriction on the combo license in this first year to lessen the density of  
17 the deer population, and

18 **WHEREAS**, bringing down the density of the deer population in the CWD Management Zone is served by  
19 the revision of the combo license requirements to allow the harvest of more deer, and

20 **WHEREAS**, there is a consensus that management of transmission and contamination require the  
21 harvest of deer regardless of age or antler size to decrease the population density, and

22 **WHEREAS**, most all wildlife management strategies take several years to produce results that can be  
23 statistically measured and their efficacy in reaching goals confirmed, and

24 **WHEREAS**, to not continue that strategy for several years could confound the results of any changes  
25 (making it look more effective because of the first year's reduction of population density). NOW,

26 **THEREFORE BE IT RESOLVED**, MUCC encourage the continuance of the present strategy in the CWD  
27 Management Zone and any additional areas where the CWD threat is identified with surveillance, until  
28 sufficient data have been generated as to its effectiveness, and

29 **BE IT FURTHER RESOLVED**, MUCC should stress the importance of population control and the role of  
30 the hunter/conservationist in this effort and encourage the issuance of additional doe permits and  
31 extended antlerless seasons, where advisable, to decrease the density of susceptible deer, and

32 **BE IT FURTHER RESOLVED**, MUCC remain involved in the design of any field studies in consultation with  
33 the biologists of the DNR and other wildlife disease authorities.

**Proposed Resolution #G**

**Submitted by:** Erik Schnelle, Michigan QDMA State Chapter President  
**MUCC Region:** 5  
**Proposed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **SUPPORT FOR RESEARCH INTO CWD MANAGEMENT BEST PRACTICES**

1 **WHEREAS**, Chronic Wasting Disease (CWD) is an invariably fatal disease of a highly infectious nature,  
2 and  
3 **WHEREAS**, left unchecked, CWD has been shown to not only decimate deer populations as the incidence  
4 climbs inexorably higher, but CWD also depress the age structure of the population significantly, and  
5 **WHEREAS**, the possibility of contracting the disease increases with age in both sexes and the incidence  
6 risk level in a population increases with the deposition of prion in the environment, and  
7 **WHEREAS**, controlling CWD is complicated by this persistent environmental contamination with the  
8 responsible prion being shed from infected deer well before they show signs of infection, and  
9 **WHEREAS**, the persistence of the prion in the environment results in an increased indirect transmission  
10 rate as the disease becomes endemic and the presence of infective prions increases with the density of  
11 the deer population, and  
12 **WHEREAS**, direct transmission is also facilitated by concentrating the population on the landscape  
13 (density of susceptible deer) either by baiting or confinement, increases the risk of both direct and  
14 indirect transmission, and  
15 **WHEREAS** in the CWD Management Zone, where current deer densities are high, there are far more  
16 mature does than mature bucks, the harvest is heavily biased towards bucks rather than does, habitat  
17 damage to wood lots is extensive, and a lack of winter thermal cover and food results in large  
18 concentrations of deer, and the NRC/DNR has already passed a resolution to conduct scientific research

19 to determine the best regulatory and management approaches to combatting CWD by reducing deer  
20 densities, reducing the age of the doe cohort, and better balancing deer harvest, and  
21 **WHEREAS**, Yearling doe and buck dispersal in both spring and fall is a factor in the spread of CWD into  
22 new areas, and the timing, rates and distances of dispersal are made worse by high densities, lack of  
23 spring fawning habitat, and a scarcity of mature bucks, and  
24 **WHEREAS**, in the current CWD area the deer harvest is not balanced and is heavily weighted towards  
25 young bucks, resulting in a herd that has far more does than bucks, does that are much older on average  
26 than the bucks, and increases in deer densities, and  
27 **WHEREAS** effective disease management should focus on using current knowledge of deer behavior to  
28 reduce disease risk and ensure the harvest of the older deer that are most likely to be infected, that are  
29 spreading prions in the environment, and spreading the disease through social contact.  
30 **WHEREAS**, there is an urgent need to determine the best deer and disease management strategies to  
31 fight CWD and this research may take several years to produce results that can be statistically measured  
32 and their efficacy in reaching goals confirmed, and  
33 **WHEREAS**, in the scientific method the relative effectiveness of management approaches cannot be  
34 determined without the ability to compare competitive approaches and with a control group. and  
35 **WHEREAS**, there are 16 counties in the current CWD area, with additional CWD detections in new areas  
36 likely to result in an even larger CWD management area, creating an opportunity to perform research  
37 into multiple competitive CWD management approaches and,  
38 **WHEREAS** no state agency has tried a combination of regulatory changes to focus harvest on the deer  
39 most likely to be infected, with clear scientifically based doe harvest and testing goals set at a DMU  
40 level, with the goals explained to hunters prior to each season and progress towards those goals  
41 communicated throughout the deer seasons, and with habitat programs designed to reduce  
42 concentrations of deer and dispersal NOW,

43 **THEREFORE BE IT RESOLVED**, MUCC encourage and support the efforts of the NRC and DNR to perform  
44 research into determining the best CWD management approaches for Michigan’s CWD Management  
45 Zones, and any additional areas where the CWD threat is identified with surveillance, until sufficient  
46 data have been generated as to its effectiveness, and  
47 **BE IT FURTHER RESOLVED**, MUCC should stress the importance of population control and the role of  
48 the hunter/conservationist in this effort and encourage the issuance of additional doe permits and the  
49 establishment of doe harvest goals, where advisable, to decrease the density of susceptible deer, and  
50 **BE IT FURTHER RESOLVED**, MUCC remain involved in the design of any field studies in consultation with  
51 the biologists of the DNR and other wildlife disease authorities.

**Proposed Resolution #H**  
**Requires 2/3rd Majority**

**Submitted by:** Craig Larson, Dowagiac Conservation Club  
**MUCC Region:** 7  
**Proposed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **USE OF ARTIFICIAL LIGHT TO TRAVEL TO DEER HUNTING SITE**

1 **WHEREAS**, Under current Michigan regulations (page 17 of the 2018 Michigan Hunting Digest), an  
2 artificial light may be used from November 1-30 on property you own or property owned by a member  
3 of your immediate family if you do not have in your possession or control a bow and arrow, firearm, or  
4 other device capable of shooting a projectile; and  
5 **WHEREAS**, It is a violation of federal law to shine at any time on any national wildlife refuge; and  
6 **WHEREAS**, Deer hunters may use an artificial light one hour before and one hour after shooting hours  
7 while carrying an unloaded firearm or bow and arrow when traveling on foot to or from their  
8 hunting location;  
9 **WHEREAS**, many hunters, particularly public land hunters, must travel to their hunting location much  
10 earlier than one hour before shooting hours in order to secure their spot and also to minimize wildlife  
11 disturbance and would benefit from being able to use an artificial light. NOW,

12 **THEREFORE, BE IT RESOLVED**, that MUCC work with the Natural Resources Commission or the Michigan  
13 Legislature as necessary to change the regulation to allow deer hunters to use an artificial  
14 light two hours before and two hours after shooting hours while carrying an unloaded firearm or bow  
15 and arrow when traveling on foot to or from their hunting location.

**Proposed Resolution #1**  
**Requires 2/3rd Majority**

**Submitted by:** Rob Miller, MUCC Wildlife Chair  
**MUCC Region:** 9  
**Proposed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **EXPANDED HUNTING OPPORTUNITY WHILE MANAGING FOR A BALANCED DEER HERD**

1 **WHEREAS**, Our current deer hunting regulations offer either a single buck tag or a combo tag which  
2 allows for two bucks.

3 **WHEREAS**, Arguably our deer herd is out of balance with the buck-doe ratio being very heavy with does

4 **WHEREAS**, There is and has been for some time a collaborative effort to revert to the pre-1986 one buck  
5 license. (Eon Green on line petition 2016 which gathered over 10,000 signatures in support)

6 **WHEREAS**, There is a growing trend for Michigan Hunters to travel out-of- state in search of their deer  
7 hunting opportunities which equates to much lost revenue to the State of Michigan.

8 **WHEREAS**, The current "combo" license allows the take of two bucks with exceptions allowed while  
9 utilizing archery equipment to allow 1 buck 1 doe or even 2 does with 100% archery equipment.

10 **WHEREAS**, Michigan comes from a long culture of not shooting does which shows in our current deer  
11 herd with the large imbalance in most areas.

12 **WHEREAS**, The current system requires extra effort from any sportsmen to acquire the legal means  
13 (tags) to harvest a doe with a gun.

14 **WHEREAS**, Michigan has been making efforts with heavy support of sportsmen to increase the age  
15 structure and quality of our deer herd in many Deer Management Units (DMUs) throughout this state.

16 **WHEREAS**, This resolution as detailed below does not "take away" opportunity but rather "adds"  
17 opportunity with a high chance of helping to strengthen our herd while being able to harvest venison.

18 NOW,

19 **THEREFORE BE IT RESOLVED**, That Michigan United Conservation Clubs (MUCC) work with the  
20 Department of Natural Resources (DNR) and the Natural Resource Commission (NRC) to:

21 1) Change the current definition of combo tag to read valid for the take of one buck and one doe  
22 with any legal method;

23 2) Only allow a single buck tag option in areas that require extra herd protection and would  
24 otherwise not allow the take of a doe with any means (such as archery);

25 3) Make available in all other areas either the new combo (both sex) or single buck tag.

26 4) Maintain hunter supported additional requirements in DMUs that have supported such. (Such as  
27 APRs)

28 5) In areas of special management needs such as disease areas or high-density areas additional  
29 tags can be made available per DNR recommendations or mandates.

**Proposed Resolution #J**  
**Requires 2/3rd Majority**

**Submitted by:** Rob Miller, MUCC Wildlife Chair  
**MUCC Region:** 9  
**Proposed:** December 8, 2018 Conservation Policy Board Meeting  
**Title:** **MANDATORY DEER REGISTRATION**

1 **WHEREAS**, Current methods utilized to determine our deer herd size, take, etc are largely based on  
2 estimates and voluntary contributions from the sportsman.

3 **WHEREAS**, To do our best in managing the deer herd we need to gather accurate information.

4 **WHEREAS**, Wisconsin is a state to which appears to have a good, mandatory deer registration system in  
5 place that could be looked to for ideas.

6 **WHEREAS**, The hunting community commonly down plays the Department of Natural Resources (DNR)  
7 forecasts and field reports of harvest, herd etc as there is little buy in from the general sportsmen on the  
8 methods currently in place in making such predictions or determinations. NOW,

9 **THEREFORE BE IT RESOLVED**, That Michigan United Conservation Clubs work with the DNR and the  
10 Natural Resource Commission to enact a mandatory deer check system that is supported with penalties  
11 for those that ignore this requirement. This system should entertain these or similar steps:

- 12 • Simple call in system with predetermined basic questions such as your ID, animal description,  
13 method of take, area of take and any other simple question that may be useful such as "Do you  
14 hunt out of State and why?"
- 15 • On line system that will complement the call-in system as another means of reporting.
- 16 • Historic drive-in check stations where available that again will maintain the check in  
17 requirement.
- 18 • The deer will need to be registered within 24 hours of harvest OR 24 hours of returning home  
19 from camp (to accommodate remote camps where access to phone, internet etc is not  
20 reasonable)
- 21 • Impose penalties for those that do not register