



STATE OF VERMONT
OFFICE OF THE ADJUTANT GENERAL
789 Vermont National Guard Road
Colchester, Vermont 05446-3099

June 7, 2021

Mr. Chris Bradley
Vermont State Rifle & Pistol Association
454 South Main Street
Northfield, Vermont 05663

Subject: New Civilian Short-Term License Policy for EAFR

Dear Chris,

I am writing in response to your letter dated May 17, 2021 and would like to address your various points of concern.


You reference 10 USC 7409 regarding civilian use of military range and the fact that the Secretary of the Army provides guidance on civilian use and potential fees. However, the Service Secretary has further delegated civilian use authority to the Chief, National Guard Bureau (CNGB). Under signature of CNGB, NGB Regulation 5-1 specifies that the VTNG will charge fees for civilian use of ranges. Those fees are to be at least equal to the open market. The NG is not allowed to compete with private organizations. Additionally, NGB published a fee structure for various types of ranges. Therefore, based on a combination of market research and the published fee charts, VTNG arrived at \$5 per person for scheduled practice times and \$140 for the daily use fee for events. Additionally, based on review of other National Guard organizations, we have not found another state that allows civilian use of military ranges.

Regarding your interpretation of 20 VSA 361, that the Governor can intercede is not accurate. The Ethan Allen Firing Range is a 100% federal facility that is owned by the United States Government and licensed to the VTNG. While the VTNG conducts the day-to-day operations, it does so at the direction of the Department of the Army and the CNGB. The authority for use of the property falls to the CNGB and their delegate, the United States Property and Fiscal Officer (USPFO), not the State of Vermont or the VTNG.

Regarding your concerns around fees and the need to be able to generate income to offset expenses as well as some revenue, the federal government is not authorized to supplement your funding and is not in-place so that VSRPA can generate revenue.

I fully understand, there is cause for concern and confusion when your organization has operated all these years without incurring any cost for range use at the Ethan Allen Firing Range. Through review of policies and regulations it was determined that the VTNG was not in compliance with prescribed policies, and this is the result of the course correction.

Respectfully,



GREGORY C. KNIGHT
Major General
The Adjutant General