



## NEVADA FIREARMS COALITION

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October 11, 2014

Clark County Board of County Commissioners  
500 S. Grand Central Parkway  
Las Vegas, Nevada 89155

Re: Comments on Agenda Item: Modification/increase in Fees at Clark County Shooting Complex. October 21, 2014.

Dear Clark County Commissioners:

Please find the following as our response to the email of October 8, 2014 from the Clark County Shooting Complex (CCSC) to the CCSC Advisory Committee and Registered User Groups, regarding the agenda item and proposed fee schedule for the User Groups at the CCSC.

There are three basic markets for the CCSC.

- “Walk in Public” This market is the 47% of Clark County citizens who own firearms or archery equipment and do not shoot at retail or membership ranges. When the word “public shooter” is used, that applies to this market. The posted CCSC hours are for this market, and certain ranges are set aside for their use.
- “Registered User Groups” These are clubs, corporations, organizations and governmental identities whose use is scheduled through the CCSC office. They are required to provide their own safety officers, security, insurance etc.
- “CCSC Program” These are shooting related activities provided and managed by the CCSC as programs or scheduled special activities.

This proposed fee change only applies to the Registered User Groups.

Comment: “Community/Not for Profit” registered user groups.

Our first comment is in regards to the classification of registered user groups as indicated in the proposal. The initial resolution approved by the BCC under “Shooting Park Fees” defines the two types of user groups. To our knowledge there have been no

subsequent BCC resolutions or agenda items to rename these two types of registered user groups. Therefore the proposed agenda item is flawed in the description. The definition of the two types of registered user groups in the approved document states:

**Not For Profit Use Fees**

*Note: Not-for-profit registered user groups have elected officers or public managers and are conducting events sanctioned by non-profit or governmental organizations.*

**COMMERCIAL ACTIVITIES AND BUSINESS FEES**

*Note: Commercial activities and businesses are registered user groups who are engaged in business for the purpose of providing commercial services.*

Currently the CCSC, via the Parks Department, requires “not for profit” registered user groups to prove their “nonprofit” status per submission of IRS 501 (c) n status. Not all user groups are incorporated and do not have IRS tax status. In addition, the Parks Department is not a federal IRS agency and requiring the “proof” of IRS tax status may exceed their authority.

The proposed agenda item does not redefine the definition of “not-for-profit” yet it states the fee is for “community/not for profit.” We would appreciate a definition of what “community” means. Further, the original definition of these types of registered user groups was focused on having elected officers or public managers, or governmental organizations. The intent clearly was not IRS tax status. By requiring “non required” tax status, not only is the Parks Department exceeding its authority it is also denying use of the CCSC to some registered user groups that do not have tax status.

One of the primary management goals of the CCSC was to “reduce barriers to participation.” This requirement by the Parks Department to:”prove tax status” is a burden that is restricting participation.

**Recommendation:**

Per BCC resolution, amend the original resolution of June 17, 2008 “Registered User Groups” (see attachment A) to reflect the definition of “registered user groups” by the addition of:

“There are two types of registered user groups who may reserve facilities and ranges at the Clark County Shooting Complex”

1. Non Commercial clubs and organizations that have elected officers or public managers, and Governmental organizations
2. Commercial organizations who are engaged in business for the purpose of providing commercial services. “

Comment: Registered User Group Fees by hour rather than by shooter.

As we understand the issue, the current fee schedule of booking and renting the ranges by four hour blocks and charging the fee based on the number of shooters shows that a majority of registered user group activity is for one or two shooters. They may also be using the range as a classroom rather than booking the more expensive classrooms. This limits the revenue. The proposed solution is to charge an hourly rate rather than a shooter fee.

As was presented to county management in an earlier letter, the proposal caps the maximum range fee income at \$150.00 a day for Non Commercial Registered User Groups and at \$300.00 per day for Commercial Registered User Groups.

Due to noise regulations, the CCSC can only offer outdoor shooting opportunities from 7 am to 10 pm, which is 15 one hour scheduling periods. Hence the maximum use is limited to 15 fee periods in one day.

The current fee schedule is density dependent which means that the larger the event, the more fees can be collected. For example, an event hosting 100 shooters for 10 hours for a noncommercial registered user group would be \$1,000.00 (\$10 per shooter X 100 shooters). Under the proposed fee structure the fee would be \$100 dollars (\$10 per hour X 10 hours) resulting in a loss of \$900.00. So to solve a fee problem at the lower use end, the CCSC will lose a significant amount at the higher end.

The CCSC business plan should be to increase use and increase participants. This fee proposal is contrary to raising fees and any need to increase participants.

The solution would be to propose a fee structure that would address the low end use while keeping the benefits of the high volume use. Charge a minimum shooter fee that will cover costs (say 4 shooters) for the minimal use of a range, but continue to charge the shooter fee for all use and require that range use be for shooting purposes only.

**Recommendation:**

Change the scheduling event period to two hours rather than four. This is administrative and does not require BCC resolution. But it will free up more reservation periods to offer registered user groups.

“Registered User Groups may reserve ranges for shooting activities only per the reservation scheduling process, however a four shooter minimum fee will be charged per the appropriate registered user group rate. A fee of \$8.00 per shooter will apply to noncommercial registered user groups and \$12.00 per shooter will apply to commercial registered user groups.”

Comment: Night Lights

The fee for night lights says it is “per day” and offers no other clarification. We assume the intent is the lights necessary to conduct shooting during non-day light hours at the respective ranges. Shotgun ranges are already charged a “field fee” so there is no need to charge additionally for lights.

**Recommendation:** Change the proposal to say:

“Range Night Lights: \$35.00 per range for night shooting activities at the Education Center Ranges.”

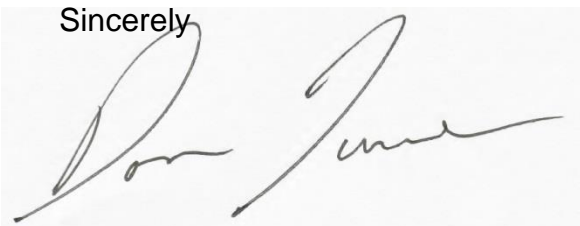
Comment: Staff Fee

The purpose of the Registered User Group program was the development of a partnership between CCSC and User Groups to allow CCSC to gain fee benefits of shooting programs with minimal staff overhead. The electric gates and Education Building access was designed to allow Registered User Groups access without staff involvement. Registered User Groups are required to provide their own insurance to cover their activities. There is no reason for staff presence during registered user group activities. Registered User Groups events are always scheduled. Staff needs to ensure ranges and classrooms are clean and safe before and after group activities. Registered User Groups could be issued temporary gate codes and temporary key sets for any activities they may have during after-hours use. The user group regulations also require them to provide their own security for any events that require use of the property during closed hours. As they are scheduled and accountable, staff should not have to be assigned during their activities. Violations of rules should be strictly enforced.

**Recommendation:** Disapprove the staff fee as an unnecessary burden on the registered user groups.

Thank you for this opportunity to comment,

Sincerely

A handwritten signature in black ink, appearing to read "Don Turner", is written over a light gray rectangular background.

Don Turner, President  
Nevada Firearms Coalition

cc: CCSC Advisory Committee  
NVFAC BOD

## ATTACHMENT A

### REGISTERED USER GROUPS

All groups who desire to use the park must have a current Registered User Group application on file at the Park Office.

No person shall provide commercial firearms instruction or programs at the Clark County Shooting Park without being registered as a User Group.

Individuals may not register as a User Group unless they are a bonafide business.

The Clark County Shooting Park is managed as a recreational shooting facility. Requested uses that do not feature the shooting sports, or are not related to the shooting sports, or the accomplishment of the mission of Clark County will not be allowed on property.

All event shooters and Registered User Groups must pay the appropriate shooting park fees through designated event coordinators or match directors.

All Registered User Group event coordinators and match directors must sign in at the Park Office and obtain an invoice before set up or shooting.

All events, buildings and facilities must be requested for scheduling reservations through the Park Office at least 30 days in advance.

A gate code will be issued to Registered User Groups whose events begin before Clark County Shooting Park opening, or end after Clark County Shooting Park closing.

Registered User Groups may store items necessary for their events on property in a designated area, after receiving approval from the Park Office.

Paint ball and force on force training is prohibited except by law enforcement, security and military units as part of their official training.

All Registered User Groups must maintain a current Registered User Group application on file at the Park Office before being scheduled to use the Clark County Shooting Park.

All Registered User Groups must schedule and reserve event ranges and buildings for their events through the Park Office per established Clark County Shooting Park procedures.

All reservations and cancellations must be made in writing. Failure to cancel an event in writing within 48 hours of the event will result in a failure to cancel fee assessment. Reservations are unavailable to registered user groups with any outstanding fee balances.

All Registered User Groups must possess a current liability insurance certificate naming Clark County as additional insured before using the Clark County Shooting Park. A current copy of the certificate will be provided to Clark County Shooting Park and kept on file with the registered user group application. A lapse of insurance coverage nullifies the application and any scheduled events are subject to cancellation by Clark County Shooting Park.

All Registered User Groups must conduct their events with the highest standards of safety for participants and for others.

All Registered User Groups must provide trained safety officers to supervise their events. If a sanctioned event is being held, these officers must meet the standards set by the sanctioning authority.

All Registered User Groups are responsible for the actions, security and safety of participants and spectators, range safety, range conditions and cleanliness.

All Registered User Groups must ensure that participants and guests follow all shooting park rules and regulations.

All Registered User Groups must be responsible for match set up and clean up and ensure that their Clark County Shooting Park reserved areas are left in a clean condition. Clark County Shooting Park does not provide set up nor clean up services. Trash will be placed in trash bins or garbage cans as provided. In the case of a large event (four or more days) the registered user group will provide a roll off dumpster. Registered User groups will be charged a clean up fee if Clark County Shooting Park staff must clean up after an event.

All Registered User Groups must provide portable toilets if their event lasts more than six hours with 50 or more people (including participants and spectators). The first toilet must be ADA approved, with an additional toilet provided for every additional 25 people.

All Registered User Groups must hire a licensed security agency for the duration of the event, or rental of buildings, when the event includes participants, vendors and goods or services remaining on property beyond normal hours of operations. The security agency must be approved by and contact the Park Office in advance to obtain specific instructions on close up procedures, access, etc.

All Registered User Groups must disqualify any participant who consumes or is under the influence of alcohol or drugs or who violates any Clark County Shooting Park safety rule(s) during the event.

All Registered User Groups must pay Clark County Shooting Park all applicable fees within 10 working days after each event.

All Registered User Groups must ensure that participants do not use the reserved facilities before or after an event.

All Registered User Groups must understand that non-compliance with Clark County Shooting Park rules, procedures and instructions from Rangemasters or park personnel, or any safety violations, or late payment of fees, or lapse of insurance will result in loss of privileges to use Clark County Shooting Park.

Approved by Clark County Board of County Commissioners on June 17, 2008