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March 6<sup>th</sup>, 2025

Hon. Donald Mason, Mayor  
City of Zanesville, Ohio  
401 Market Street  
Zanesville, OH 43701

**SENT VIA ELECTRONIC SUBMISSION** to don@coz.org

**RE: AOPA Opposition to Landing Fees at Zanesville Municipal Airport**

Dear Mayor Mason,

The Aircraft Owners and Pilots Association (AOPA) is the largest aviation membership organization in the world, representing over 300,000 pilots and aircraft owners. We write to express our opposition to the proposed landing fees for the Zanesville Municipal Airport (KZZV).

AOPA became aware of the proposed ordinance designed to apply landing fees to all aircraft operating at the airport. This is extremely concerning as small general aviation airports rarely charge landing fees for all aircraft, and the proposed \$50 fee far exceeds many other categorical landing fee schedules for light aircraft at airports across the country. Landing fees are designed to recoup costs associated with the maintenance of runways, taxiways, ramps, and associated infrastructure. Small, light aircraft have little to no impact on the useful life of the pavement and markings. There are several factual reasons airports typically do not assess these fees to small aircraft operators:

- Landing fees discourage pilot proficiency and currency training. Takeoffs and landings are two of the most critical phases of flight, requiring proficiency and practice to ensure they are done correctly and safely. Pilots are urged by the industry to practice these phases of flight at both their home airport and in other airport environments. Any policy seeking to discourage the **safety** of the flying public should be re-evaluated and scrutinized.
- The introduction of landing fees is a short-sighted approach to revenues and will only detract from the value that general aviation and flight training bring to this substantial economic industry in Ohio. Landing fees threaten the future health of aviation by adding

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another **barrier to entry** into an industry already plagued by increasing financial costs. Airports should be looking for ways to attract economic activity at your airport by removing financial burdens that make it less inviting. The economic benefits of your airport don't stop at the fence but instead filter out into the surrounding communities. In a [2014 Airport Focus Study](#) conducted by ODOT, Department of Aviation, calculated the economic impact of ZZV to the local community to be over \$6 million. This alone should prove that the airport is a key infrastructure asset to the citizens and businesses in and around Zanesville.

- According to the ordinance relating to the landing fees, all aircraft will be subject to these fees, with exemptions only to military and air carrier service (which ZZV does not and will not have). Introducing a landing fee will not aid in attracting new aeronautical businesses to operate out of Zanesville. If a patron has a choice between a business at your airport with a landing fee or another business at another airport without a landing fee, **your airport will likely lose that patron.**
- There has been little detail provided about how the revenues will be **tracked and reported**. Is the proposed fee in line with a **realistic and nondiscriminatory allocation** of the airport's true costs? The burden of proof lies with the public entity seeking new revenue and not with the users of the airport. To that point, it is important for policy makers to understand that the airport's runways are designed for an FAA approved critical use category aircraft, which is likely heavier than many of those itinerant operations you aim to bill. A focused concern is upon the billing of landing operations by small aircraft. Further, the airport is in operation (lights on, grass mowed, operations personnel on site, obstructions cleared, etc.) for existing based users and businesses regardless of the itinerant operations; therefore, many of the lighter general aviation itinerant operations are not adding any cost to the airport.
- If these fees are, in part, an effort to **control noise or to deter certain aircraft operations**, you are reminded that Congress has long granted the FAA exclusive jurisdiction to regulate the areas of airspace use, management and efficiency; air traffic control; safety; navigational facilities; and aircraft noise at its source. (49 U.S.C. §§ 40103, 44502, and 44701- 44738). This means that any attempt to regulate the airspace by a state or its political subdivision has been preempted. Unless a state can demonstrate that there is an exemption that would allow it to regulate aircraft in flight, it cannot take actions that are calculated to regulate such aircraft within U.S. airspace.

AOPA would also like to ask the mayor and council for specific responses to the following questions, to help us better understand the origination and implementation of landing fees at Zanesville.

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- Has the airport sponsor (City of Zanesville) assessed or studied how the impact of landing fees will impact general aviation, specifically pilots, student pilots, charitable organizations, on-airport businesses, and other businesses or local organizations that make use of the airport?
- Will the revenue from these fees be used strictly for airside safety improvements?
- If the airport sponsor is trying to defray costs of specific project, or cover direct costs, what are those costs, and is there a specific timeline and percentage of revenues that will be generated to cover these costs?
- Have all other avenues for revenue generation been investigated? Has the airport sponsor inventoried available non-aeronautical use land that could potentially be revenue-generating (agricultural leasing, non-aeronautical use business leasing, etc.)?
- Does the airport have a development plan that focuses on long-term sustainability and local funding for the airport, including standardizing and market-rate of leaseholds for on-airport users? What revenues are generated from on-airport airport users, i.e., fuel flowage rates, gross revenue percentage claim from on-airport business, etc.
- Are all hangars at capacity for aeronautical use storage, and if not, is there a plan to maximize hangar use or seek approval for non-aeronautical use of facilities? There is currently a hangar shortage nationwide, and hangars are a direct way for airports to generate revenue.

In closing, we oppose the Zanesville Municipal Airport landing fee proposal, and we strongly encourage further collaboration with airport users to implement less burdensome and financially taxing programs to address concerns. Thank you for your time and attention to this especially important issue.

Respectfully,

Kyle Lewis  
AOPA Great Lakes Regional Manager / Airports and State Advocacy

cc:  
Zanesville City Council  
Scott Brown, Public Service Director