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Hon. Donald Mason, Mayor  
Zanesville City Council  
401 Market St  
Zanesville, OH 43701

May 15<sup>th</sup>, 2025

**TRANSMITTED VIA ELECTRONIC MAIL TO: [don@coz.org](mailto:don@coz.org) / [billie.corns@coz.org](mailto:billie.corns@coz.org)**

**RE: Egregious Landing Fee Ordinance Under Consideration, City of Zanesville, OH**

Mr. Mayor, City Council

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). **The landing fee schedule proposed for Zanesville is discriminatory, unreasonable, and entirely outside of industry norms.**

While AOPA appreciates the previous consideration to modify the landing fee ordinance to a weight-based fee categorization from the original proposed \$50.00 per aircraft landing fee, the ordinance and fee schedule as presented for the 3<sup>rd</sup> reading are still problematic. AOPA acknowledges that airports should be as self-sustaining as possible, by FAA policy and grant obligations, those same grant obligations also require the fees to be reasonable and non-discriminatory. AOPA also acknowledges that landing fees are a legal method of revenue generation for airports but should be used to cover direct costs of pavement maintenance related to the usage of runways and taxiways. Landing fees are not designed to be nor recommended to be the sole method of revenue generation for an airport.

The city of Zanesville, as the federally obligated airport sponsor, is required to operate and maintain the airport as an airport, made available for public use under non-discriminatory terms. ***Grant assurance 22(a) Economic Nondiscrimination*** *"It will make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport."* These grant assurances are codified in Title 49 U.S.C, subtitle VII, as amended.

The proposed fee structure is discriminatory to light aircraft, under 1,000 pounds, discriminatory to flight instruction operations, and the overall fee amount by weight category is unreasonably high compared to other similarly situated airports. No other general aviation airport in Ohio (or the region) charges landing fees to aircraft under 6,000 pounds. AOPA is also unaware of any other airport in the United States that charges landing fees to locally based aircraft. Airports that

do charge landing fees based on weight category do so by cents or low dollar amounts per 1,000 pounds of weight, and the vast majority charge aircraft only over 12,500 pounds. As stated in our previous letter, landing fees interfere with safety, pilot proficiency, flight training, and overall airport operations when charged to low-weight classes of general aviation aircraft. Landing fees deter airport usage by light general aviation aircraft operators. The proposed landing fees offered by Zanesville will decimate operations at the airport. This is not hyperbole, but fact. It is an industry standard accepted practice to only charge higher weight category aircraft landing fees.

AOPA's concerns about the current proposed fee structure:

- Impact safety and pilot proficiency at the airport
- Overly burdensome and discriminatory to flight instruction use of the airport
- Discriminatory to low-weight category aircraft
- Non-transparent fees (where will these fees be published)
- How will the fees be tracked and collected (transparency)
- The methodology used to calculate fees is non-transparent
- How will the revenue be used, and how will the city ensure the fees remain at the airport for improvements?
- Does the city have a long-term sustainability plan for funding the airport?

AOPA has proposed that the city of Zanesville convenes an airport advisory committee to investigate and make recommendations for revenue generation to help offset direct costs to the city. This has not occurred. By federal law, under the FAA's Rates and Charges Policy, Subtitle VII, Part B, Chapter 471, §47129 of U.S.C., airport sponsors are advised to consult with aeronautical users well in advance of significant changes in fees or fee structures. (*Local Negotiation and Resolution 1.1.1*). **AOPA strongly recommends that the city of Zanesville consult with aeronautical users on this issue.**

**If the city proceeds to implement the current proposed fee structure, AOPA will recommend that the users of the airport proceed with a "Part 13 or Part 16" complaint to the FAA, Office of Airports, as provided by Title 14 CFR Parts 13 and/or 16.**

Respectfully,



Kyle Lewis  
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Aircraft Owners and Pilots Association  
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cc: *Scott Brown, Public Service Director, City of Zanesville*  
*Ohio State Representative Adam Holmes, OH 97<sup>th</sup> District*  
*Ohio Senator Al Landis, 31<sup>st</sup> District*  
*Congressman Troy Balderson, OH 12<sup>th</sup> District*

AIRCRAFT OWNERS AND PILOTS ASSOCIATION