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Manistee Blacker Airport Authority
Miles Weaver, Airport Director
2323 Airport Rd
Manistee, MI 49660

August 5th, 2026

TRANSMITTED VIA ELECTRONIC MAIL TO: manager@flymanistee.com

RE: Proposed Landing Fees, AOPA Concerns and Questions

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 concern about the proposed landing fees proposed at Manistee Blacker Airport (KMBL).

AOPA finds the proposed landing fee schedule extremely concerning, as small general aviation airports rarely charge landing fees to all aircraft, and the proposed $10-$30 based on weight (future $14-$38.00) fee far exceeds many other categorical landing fee schedules for light aircraft (under 12,500 lbs.) at airports across the country. Landing fees are designed to recoup the costs of maintaining runways, taxiways, ramps, and related infrastructure. Small, light piston aircraft have little to no impact on the useful life of the pavement and markings.

In our research, out of 215 public-use airports in the state of Michigan, only 1 general aviation airport charges landing fees for aircraft with a gross weight under 6,000 lbs.: Mackinac Island Airport. Landing fees are the exception, not the rule, at GA airports across the country. Landing Fees are a divisive topic currently, as a few airports have sought to implement these fees to deter traffic based on noise or flight training operations. This has led to FAA involvement for users seeking relief under the federal grant assurances. Airport sponsors must use proper guidance and consideration from users before implementing new fees. AOPA is a proponent of airport sustainability and fair and reasonable fee implementation. **AOPA generally opposes landing fees when light general aviation users will be affected**; there are several factual reasons airports typically do not assess landing 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 to light GA users is a short-sighted approach to revenue generation and will only detract from the value that general aviation and flight training bring to this substantial economic industry in Michigan. Landing fees threaten the future health of aviation by adding increased costs to operators that do not have the ability to pass along fees and associated costs. Landing fees will only give GA pilots a reason to NOT operate at MBL. Airports that have instituted landing fees to light GA operators have seen as much as a ***40% reduction in activity***.

- Landing fees and other non-descript fees are a barrier to entry into an industry already plagued by increasing financial costs. Airports should be looking for ways to attract economic activity 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. The airport reported 3,749 total operations in 2025, which is low in terms of GA airports nationwide. MBL leadership should be exercising ideas to increase operations, not hinder them, as landing fees to light GA will surely do.

- 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, policymakers need 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 additional 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 airport management for specific responses to the following questions, to help us better understand the origination and implementation of landing fees at MBL.

- Has the airport sponsor (Manistee Blacker Airport Authority) assessed or studied how the impact of landing fees will affect 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 a 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 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 pathway for airports to generate revenue.

In closing, we oppose the MBL landing fee proposal in its current form, and we strongly encourage further collaboration with airport users to implement more favorable terms and less financially taxing programs to address concerns. Thank you for your time and attention to this especially important issue.

Respectfully,

Kyle Lewis
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Aircraft Owners and Pilots Association
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cc:
Manistee Blacker Airport Authority