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

August 24, 2026

TRANSMITTED VIA ELECTRONIC MAIL
RE: Proposed Landing Fees – Response to August 13, 2026 Letter

Dear Chairperson Walker and Mr. Weaver:

The Aircraft Owners and Pilots Association (AOPA), representing more than 300,000 pilots and aircraft owners, appreciates the Manistee Blacker Airport Authority's August 13, 2026 response to our August 5 letter concerning the proposed FY2027 landing fee and Rates and Charges Schedule at Manistee Blacker Airport (MBL).

We welcome the additional clarification regarding the Airport Authority's intentions, including confirmation that existing-based aircraft, military and government operations, charity medevac operations, and touch-and-go operations are proposed to remain exempt. We also appreciate the Authority's acknowledgment that the proposed fee structure and collection process ***"was not communicated very well"*** when initially distributed to airport tenants and users.
However, after reviewing the response, AOPA believes several of the substantive questions raised in our August 5 letter remain unanswered. More importantly, the response does not provide the financial analysis, cost-allocation methodology, operational-impact analysis, or other supporting information necessary for airport users to meaningfully evaluate whether the proposed charges are fair, reasonable, and appropriately allocated.

AOPA recognizes that airports require reliable sources of revenue and that airport users may reasonably be expected to contribute toward the facilities and services they utilize. Our concern is not whether MBL may collect reasonable aeronautical fees. Rather, our concern remains whether the proposed expansion of fees to light general aviation users is supported by an appropriate and transparent allocation of airport costs, and whether the resulting policy is in MBL's long-term financial and operational interests.

Comparisons With Other Michigan Airports
The Authority states that comparing MBL with other Michigan airports is only "nominally beneficial" because each airport operates under unique financial circumstances. AOPA recognizes that airports

differ in size, traffic, facilities, operating expenses, local funding, and revenue sources. Those differences, however, do not make comparisons irrelevant.

As stated in our August 5 letter, AOPA's research found that, among 215 public-use airports in Michigan, only one general aviation airport charges landing fees to aircraft with gross weights below 6,000 pounds. The Authority's response does not dispute this finding or provide examples of similarly situated airports employing a comparable fee structure. The rarity of these charges among peer airports is relevant when evaluating whether MBL's proposed policy is reasonable, competitive, and likely to encourage or discourage use of the airport. AOPA therefore requests that MBL identify the comparable airports, financial circumstances, or industry benchmarks relied upon when determining the proposed fee amounts.

Cost Allocation and the Basis for the Fee

The Authority disagrees with AOPA's statement that many light general aviation itinerant operations add little additional cost to the airport and responds that "every operation contributes to the cost of the airport operation, regardless of size." The Authority states that the weight-based fee structure is intended to share operational costs across different user groups so that based aircraft do not shoulder the full burden. AOPA believes this explanation raises, rather than resolves, the principal question presented in our original letter.

Many airport expenses are fixed costs that exist regardless of whether an additional light general aviation aircraft lands at MBL. The airport must maintain its runways, taxiways, lighting, grounds, facilities, staffing, and other infrastructure for existing based aircraft, commercial operations, businesses, and other users. Our August 5 letter specifically requested information demonstrating whether the proposed fee represents a realistic and nondiscriminatory allocation of the airport's actual costs. The August 13 response does not provide the underlying calculation.

AOPA respectfully requests that the Airport Authority provide:

- The airport expense categories intended to be recovered through the General Aviation Airfield Activity Fee;
- The annual amount of those costs;
- The methodology used to allocate those costs among commercial airline operations, based aircraft, transient piston aircraft, turbine aircraft, and other airport users;
- The number of anticipated billable operations within each proposed weight category;
- The projected annual revenue generated by the proposed fees;
- The basis used to establish each proposed fee amount;
- The percentage of total airfield operating costs expected to be recovered from transient general aviation users; and
- The basis for determining that a weight-based methodology fairly reflects the costs attributable to the aircraft being charged.

Without this information, users have no meaningful way of determining whether the proposed rates correspond to the costs the Airport Authority seeks to recover.

Definition of the "General Aviation Airfield Activity Fee"

The August 13 response provides important clarification that the proposed charge may not function as a traditional landing fee. The Authority states that the Fixed Base Operator will collect a "General Aviation Airfield Activity Fee" from applicable aircraft parking on the apron where the pilot exits the aircraft and from applicable aircraft receiving services.

AOPA believes this clarification creates several additional questions that should be resolved before implementation. The Airport Authority should clearly define:

- Whether the fee is triggered by landing, apron use, exiting the aircraft, receiving FBO services, or some combination of these activities;
- Whether an aircraft that lands and departs without receiving FBO services is subject to the fee;
- Whether an aircraft that parks briefly on the public apron without purchasing fuel or other services is subject to the fee;
- Whether the FBO retains any portion of the fee as a collection or administrative charge;
- Whether pilots may access the airport and its public-use facilities without purchasing FBO services; and
- Whether the fee is an Airport Authority charge collected by the FBO or an FBO charge imposed as a condition of receiving services.

A clear definition is especially important because the Authority itself acknowledged that the initial proposal was not adequately communicated to airport users.

Impact on Airport Activity and Economic Development

AOPA's original letter expressed concern that additional charges imposed upon light general aviation users could discourage airport activity, flight training, transient visits, and related economic activity. We noted that MBL reported only 3,749 total operations in 2025 and encouraged airport leadership to seek policies that increase, rather than suppress, utilization. The Authority's response does not address this concern.

Although the proposed continuation of the touch-and-go exemption is positive, proficiency training includes more than touch-and-go operations. Student pilots, instrument trainees, pilots conducting cross-country flights, and pilots seeking experience at airports away from their home field frequently conduct full-stop landings. Additional fees may influence where those pilots choose to operate. Similarly, transient pilots who elect to use another airport because of a mandatory activity fee may also purchase fuel, meals, lodging, rental cars, maintenance, or other goods and services elsewhere. Before adopting the proposed schedule, AOPA continues to believe the Airport Authority should evaluate the potential effect upon:

- General aviation operations;
- Student pilots and flight training;
- Fuel sales and FBO activity;
- On-airport businesses;
- Charitable aviation;

- Transient pilot visits; and
- Off-airport economic activity generated by airport users.

No such analysis was identified in the August 13 response.

AOPA's Conditional Discussion of Noise and Operational Restrictions

The August 13 response states that the Authority "take[s] some offense" at what it characterized as an accusation that MBL is attempting to regulate its airspace through the proposed fees.

AOPA respectfully clarifies that no such accusation was made.

Our August 5 letter specifically stated: **"If these fees are, in part, an effort to control noise or to deter certain aircraft operations..."** before discussing the federal government's authority over aircraft operations and noise at its source. The statement was deliberately conditional and intended to identify an important federal consideration should deterrence of particular aircraft operations form any part of the purpose behind the fee. If the Airport Authority confirms that the proposed fees are based solely upon legitimate cost-recovery considerations and are not intended to discourage particular categories of aircraft operations, AOPA welcomes that clarification.

Public Facility Comparisons

The Authority's response compares airport user charges to municipal boat-launch fees, downtown parking meters, state park fees, and National Park Service entrance fees.

AOPA agrees with the underlying principle that publicly owned facilities may charge reasonable user fees. However, the existence of fees at unrelated public facilities does not establish whether a particular aeronautical fee at a federally obligated airport is appropriate.

The relevant question is not simply whether a public entity may charge a fee.

The relevant questions are whether the proposed airport fee is properly supported, fairly allocated among airport users, reasonable in amount, transparent in its derivation, and consistent with the airport's federal obligations and long-term interests.

Remaining Questions from AOPA's August 5 Letter

The Airport Authority's response states that the Airport Director provided responses addressing AOPA's questions. However, several questions presented in our August 5 letter remain unanswered.

Those questions included whether the Airport Authority:

- Assessed the potential impact of the proposed fees upon general aviation pilots, student pilots, charitable organizations, airport businesses, and community organizations;
- Identified the specific direct costs or projects the proposed revenue is intended to support;
- Established a timeline or revenue target associated with those costs;
- Investigated other potential sources of airport revenue;
- Inventoried non-aeronautical-use property with revenue-producing potential;
- Developed a long-term sustainability and airport-development strategy;
- Reviewed and standardized airport leaseholds and market-rate rents;
- Identified existing revenue from fuel flowage fees, business revenue percentages, leases, and other airport users; and
- Evaluated hangar occupancy and opportunities to increase hangar-related revenue.

These questions were included because landing fees should not be evaluated in isolation. Airport financial sustainability requires examination of the airport's entire revenue structure and an understanding of whether alternative revenue opportunities have been reasonably explored before additional costs are imposed upon airport users.

Conclusion

AOPA appreciates MBL's efforts to maintain a safe and serviceable airport and recognizes the financial challenges faced by local airport sponsors. We also acknowledge the substantial financial commitment made by Manistee County and the Airport Authority toward maintaining this important transportation asset. Our position remains that airport financial sustainability and airport accessibility are not mutually exclusive objectives.

AOPA does not dispute that appropriate aeronautical users may be asked to contribute toward airport costs. However, before expanding mandatory fees to light general aviation operators, the Airport Authority should demonstrate through a transparent financial analysis that the charges bear a reasonable relationship to the costs allocated to those users and that the policy will not undermine the long-term utilization, economic contribution, or health of the airport.

AOPA respectfully requests that the Manistee Blacker Airport Authority postpone final implementation of the proposed General Aviation Airfield Activity Fee for light general aviation aircraft until the unanswered questions outlined above are addressed and airport users have been provided an adequate opportunity to review and comment upon the supporting financial methodology.
AOPA remains willing to work collaboratively with the Airport Authority, Manistee County, airport businesses, and users to identify reasonable approaches that support MBL's financial sustainability while continuing to encourage general aviation activity.

Thank you for your time and consideration of this important matter.

Respectfully,

Kyle Lewis
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Aircraft Owners and Pilots Association
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cc:
Manistee Blacker Airport Authority
Manistee County Board of Commissioners