

APPENDIX C: NATIONAL PLAN OF INTEGRATED AIRPORT SYSTEMS ANALYSIS

INTRODUCTION

The Federal Aviation Administration (FAA) manages the National Plan of Integrated Airport Systems (NPIAS). Airports included in the NPIAS are eligible for federal funding under the FAA's Airport Improvement Program (AIP) as they are considered vital to the national system. There are numerous criteria for entry into the NPIAS detailed in FAA Order 5090.3C, *Field Formulation of the National Plan of Integrated Airport Systems*. Of the nearly 20,000 landing facilities in the United States, only 3,340 were included in the 2017-2021 NPIAS, including 59 in Arizona. It is important to note that the NPIAS is updated every two years, with the next publication scheduled for Fiscal Year 2019, which is due to Congress on September 30, 2018.

The NPIAS divides airports into two categories: primary and non-primary. Primary airports are those that have at least 10,000 enplanements (passenger boardings) in a calendar year. All primary airports are also designated as commercial service. Within the primary category, airports are further grouped into nonhub, small hub, medium hub, and large hub subcategories based on the number of annual passenger boardings (enplanements). Non-primary airports are those airports that do not have at least 10,000 annual enplanements. Non-primary airports are further divided into non-primary commercial service, reliever, and general aviation (GA) subcategories.

AIRPORTS IN ARIZONA

In the FAA's most recent NPIAS, 59 Arizona airports were included, consisting of the following:

1. 9 Primary
 - 1 Large Hub Commercial Service
 - 2 Small Hub Commercial Service
 - 6 Nonhub Commercial Service

2. 50 Non-primary
 - 1 Commercial Service
 - 8 Reliever
 - 41 General Aviation

Tables 1 and 2 in Chapter 5 provide more detail on Arizona's NPIAS airports. There are eight State Aviation System Plan (SASP) airports not included in the 2017-2021 NPIAS. Information on these eight airports is provided in **Table 1**.

Table 1. Current Arizona Airports Not Included in the NPIAS

Associated City	Airport Name	FAA Identifier	Use	Ownership	Based Aircraft		Annual Operations
					2016	2021 Forecast	
Douglas	Cochise College	P03	Public	Public	15	16	47,050
Douglas	Douglas Municipal	DGL	Public	Public	12	33	3,300
Kearny	Kearny	E67	Public	Public	6	7	1,200
San Luis	Rolle Airfield	44A	Public	Public	0	0	3,100
Seligman	Seligman	P23	Public	Public	0	2	1,100
Sells	Sells	E78	Public	Public	0	0	260
Superior	Superior Municipal	E81	Public	Public	0	0	200
Tombstone	Tombstone Municipal	P29	Public	Public	4	4	340

Sources: FAA Airport Master Records, Airport Inventory and Data Survey 2017, FAA ATADS, Woolpert 2017

NPIAS ELIGIBILITY CRITERIA

To be included in the NPIAS, a GA airport must:

1. Have at least 10 based aircraft.
2. Serve a community located at least 30 minutes average ground travel time (a 20-mile radius is generally used as the equivalent of 30 minutes ground travel time) from the nearest existing or proposed NPIAS airport.

For airports not meeting the two above-listed criteria, an airport may be considered for inclusion in the NPIAS if:

1. It is included in an accepted state or metropolitan aviation system plan.
2. The community which it serves is at least 30 minutes from the nearest existing or proposed NPIAS airport.
3. It is forecast to have at least 10 based aircraft within five years.
4. There airport has a sponsor who is eligible and willing to assume the responsibilities of airport ownership and development.

For a proposed new airport, it may be included in the NPIAS if:

1. It is located at least 30 minutes average ground travel time from the nearest existing NPIAS facility.
2. There is evidence that the new facility will have at least 10 based aircraft in its first year.

2008 SASP NPIAS ANALYSIS

For reference, the 2008 SASP's NPIAS analysis was reviewed to determine changes that took place since that plan. It is important to note that at the time, the FAA's ASSET classifications did not exist. In 2008, three airports were examined for potential NPIAS inclusion: Rolle Airfield, Superior Airport, and a proposed new Maricopa Airport.

At the time of this 2018 study, neither Rolle Airfield nor Superior Airport have demonstrated demand levels that would warrant consideration for their inclusion in the NPIAS. Both facilities should continue to be monitored in the future to identify future increases in demand levels that might warrant inclusion in the NPIAS.

Since 2008, a new facility in Maricopa has become part of the public-use system: Ak-Chin Regional Airport (A39), a general aviation facility that reported 30 based aircraft and 18,320 aircraft operations in 2016. Ak-Chin Regional opened in 1999 as a privately-owned airport and was purchased by the Ak-Chin Indian Community in 2006, making it a publicly owned, public-use facility. Ak-Chin Regional was first included in the 2015-2019 NPIAS and was not considered or analyzed in the last SASP.

A Reliever airport is as an airport that serves to relieve a nearby commercial service airport of general aviation traffic and to provide a higher level of general aviation access to a community. According to FAA Order 5090.3C, *Field Formulation of the National Plan of Integrated Airport Systems (NPIAS)*, for an airport to be considered for upgrade to Reliever classification in the NPIAS, the airport must:

1. Currently have at least 100 based aircraft or 25,000 annual itinerant operations.
2. Forecasted activity level of at least 100 based aircraft or 25,000 annual itinerant operations for the duration of the time for which it seeks status as a reliever.
3. The relieved airport must:
 - Be a commercial service airport.
 - Serve a metropolitan area with a population of at least 250,000 people or have at least 250,000 annual enplanements.
 - Operate at 60 percent or greater of its capacity, be forecasted to operate at 60 percent or greater of its capacity before being relieved, or have restrictions that limit activity that would otherwise reach 60 percent of capacity.

Ak-Chin Regional should continue to be monitored for future potential upgrade to a Reliever facility. Being designated as a Reliever would open up additional FAA funding programs that could be leveraged to further the development of Ak-Chin Regional.

ARIZONA AIRPORTS TO BE CONSIDERED FOR INCLUSION IN THE NPIAS

Based on NPIAS based aircraft eligibility criteria, two of the eight publicly owned non-NPIAS airports appear to be candidates for inclusion in the NPIAS: Cochise College and Douglas Municipal, both in Douglas. However, neither Cochise College nor Douglas Municipal meet the requirements for distance from another NPIAS airport. Cochise College is approximately 11 miles from Bisbee Municipal while Douglas Municipal is approximately nine miles from Bisbee-Douglas International. There has been significant discussion over the years regarding the number of airports in Cochise County compared to the level of aviation demand. There has also been discussion regarding Bisbee Municipal and the City of Bisbee's potential interest in no longer accepting federal funds as the airport sponsor has struggled to meet funding needs as well as make the necessary improvements at Bisbee Municipal. Cochise College has an aviation program and recently completed an airport master plan, and the airport sponsor does make some investment in the facility. Douglas Municipal has also recently completed an airport master plan and is interested in making improvements, however, funding from the airport sponsor is currently limited and the runway is in significant need of a major rehabilitation with a pavement condition index of 27 as of 2017.

Based on the number of airports in Cochise County and the high level of funding needs, a more detailed analysis and coordination effort is needed to bring together the sponsors of all of the airports in the county, with a facilitated discussion regarding future needs, opportunities, and consideration of potential consolidation to better support aviation demand in the region.

ARIZONA AIRPORTS AT RISK OF NPIAS RECLASSIFICATION

Based on NPIAS inclusion criteria and an assessment of airport inventory data and forecasts from previous chapters in the SASP, there are potentially 16 Arizona airports that are at risk related to their classification in the 2019-2021 NPIAS. **Table 2** provides details on these airports. If any or all of these airports were to lose NPIAS status, federal funding could be at jeopardy as being in the NPIAS is a requirement to be eligible to receive FAA funding. That would place a greater financial burden on ADOT's State Aviation Program which provides grant funding for all publicly owned airports in the state. For airports that receive FAA funding, these airports are eligible for up to \$150,000 in grants per year from the FAA as part of a non-primary entitlement (NPE) program and ADOT provides only a match for these funds, the same as the airport sponsor. If these airports are no longer eligible for FAA funding, they would look to ADOT to assist with project grant funding which would increase the funding requests to ADOT greatly. If ADOT were unable to provide grant funding, the communities that these facilities serve would be at risk of decreased aviation services since a major funding source would no longer be available, thus impacting each airport's ability to initiate preservation and development projects. The source of the current based aircraft reflects the airport-specific responses to the 2017 Airport Inventory and Data Survey conducted through this SASP Update. The 2017-2021 development estimate is provided by the FAA in each NPIAS report, in this case the 2017-2021 NPIAS.

Table 2. Arizona Airports at Risk Related to 2019 NPIAS Status

Associated City	Airport Name	FAA Identifier	Use	Ownership	Role	NPIAS Category		Based Aircraft		2017-2021 Development Estimate
						Current	5 Year	Current	2021 Forecast	
Ajo	Eric Marcus Municipal	P01	Public	Public	Basic	GA	GA	0	4	\$1,715,813
Bagdad	Bagdad	E51	Public	Public	Basic	GA	GA	0	4	\$2,064,573
Bisbee	Bisbee Municipal	P04	Public	Public	Unclass.	GA	GA	0	8	\$0
Chinle	Chinle Municipal	E91	Public	Public	Basic	GA	GA	0	3	\$869,433
Cibecue	Cibecue	Z95	Public	Public	Basic	GA	GA	0	0	\$2,848,429
Clifton/Morenci	Greenlee County	CFT	Public	Public	Unclass.	GA	GA	0	1	\$0
Douglas Bisbee	Bisbee Douglas International	DUG	Public	Public	Basic	GA	GA	0	5	\$2,424,649
Gila Bend	Gila Bend Municipal	E63	Public	Public	Basic	GA	GA	0	4	\$692,521
Kayenta	Kayenta	OV7	Public	Public	Basic	GA	GA	60	0	\$2,933,451
Marana	Pinal Airpark	MZJ	Public	Public	Unclass.	GA	GA	0	5	\$0
Polacca	Polacca	P10	Public	Public	Basic	GA	GA	0	0	\$4,928,134
San Manuel	San Manuel	E77	Public	Private	Unclass.	GA	GA	0	19	\$0
Tuba City	Tuba City	T03	Public	Public	Basic	GA	GA	0	0	\$2,772,024
Whiteriver	Whiteriver	E24	Public	Public	Basic	GA	GA	0	0	\$2,722,923
Williams	H A Clark Memorial Field	CMR	Public	Public	Basic	GA	GA	0	3	\$1,756,585
Window Rock	Window Rock	RQE	Public	Public	Basic	GA	GA	0	0	\$7,296,046

Sources: FAA Airport Master Records, NPIAS, Airport Inventory and Data Survey 2017, FAA ATADS, Woolpert 2017

As the above-referenced airports do not currently meet NPIAS criteria, it is possible that some or all of them may be recategorized as “Unclassified” in the next iteration of the NPIAS, due to be released in the fall of 2018. Any airport that is designated as “Unclassified” is ineligible for funding through the FAA’s non-primary entitlement funding program. In fact, FAA Order 5100.38D, *Airport Improvement Program (AIP) Handbook*, specifically notes that the only projects for which “Unclassified” airports are eligible include primary runway rehabilitation projects (not more often than once every ten years), one-time obstruction removal for each primary runway end, and runway maintenance projects covered under 49 USC § 47102(3)(H) (additional projects may be considered by the FAA when extraordinary justification is provided and when the FAA concurs with that justification). Additionally, there has been discussion of removing “Unclassified” GA airports from the NPIAS. A 2015 FAA report, *Evaluating the Formulation of the National Plan of Integrated Systems (NPIAS)*, specifically mentions that these facilities remain unclassified “because they do not meet the minimum NPIAS criteria.”