Subject: Correcting notations on VFR sectional charts regarding effective hours of surface-level controlled airspace at eleven airports with part-time control towers.

Recommendations:

Change the notation on the VFR sectional charts for the eleven airports GCK, JEF, NHK, CXY, UNV, NTU, MKG, RST, GFK, RAP, and PRC from "See Chart Supplement for D/E(surf) eff hrs" to "See Chart Supplement for D eff hrs", to reflect the fact that none of the surface-level Class E airspace at these airports vanishes (converts to Class G airspace) when the control tower is closed.

Background/Discussion:

Consider the case of an airport with a part-time control tower, with part-time Class D airspace and a surface-level Class E (E4) "extension".

Section 3-2-6 e 2 in the Airman's Information Manual (2021 edition) reads as follows:

"Surface area arrival extensions become part of the surface area and are in effect during the same times as the surface area... When a part-time surface area changes to Class E airspace, the Class E arrival extensions will remain in effect as Class E airspace. If a part–time Class C, Class D, or Class E surface area becomes Class G airspace, the arrival extensions will change to Class G at the same time."

This passage tells us that in the case of an airport with a part-time control tower, with part-time Class D airspace and a surface-level Class E (E4) "extension", when the control tower is closed, the entire surface-level controlled airspace will either convert to surface-level Class E airspace, or will vanish (convert to Class G airspace). We'll never see the surface-level Class E (E4) "extension" vanish while the Class D airspace converts to surface-level Class E airspace, and we'll never see the Class D airspace vanish while the "extension" remains as surface-level Class E airspace.

So in the case of such an airport, when the tower closes, we only have two possibilities. Either the entire airspace (including the E4 "extension") becomes surface-level Class E airspace, or the entire airspace including the E4 "extension" vanishes (becomes Class G airspace).

On the VFR sectional charts, it appears that the intention of the designers of the charting conventions was to use the "See Chart Supplement for D eff hrs" for all the cases where the
surface-level controlled airspace converts to surface-level Class E airspace when the tower is closed, while reserving the "See Chart Supplement for D/E(surf) eff hrs" notation for all the cases where all the surface-level controlled airspace vanishes (converts to Class G airspace) when the tower is closed. This would allow pilots to know which of these two possibilities exists at any given airport just by looking at the VFR sectional chart. It only would be necessary for a pilot to consult the Chart Supplement or other resources if he or she wished to know the actual timetable for the effective hours of the Class D airspace.

However, this apparent intention is currently not implemented correctly. The "See Chart Supplement for D/E(surf) eff hrs" is currently used for some airports where the Chart Supplement tells us that the surface-level controlled airspace converts to Class E airspace when the tower is closed, as well as for all airports where the Chart Supplement tells us that the all the surface-level controlled airspace converts to Class G airspace when the tower is closed. Therefore any pilot encountering the "See Chart Supplement for D/E(surf) eff hrs" label on any VFR sectional chart is forced to check the "Chart Supplement" or other resources to understand the status of the surface-level airspace when the tower is closed. This is not ideal.

My suggestion is to fix this problem, and increase standardization, by changing the label on the VFR sectional charts for the eleven airports GCK, JEF, NHK, CXY, UNV, NTU, MKG, RST, GFK, RAP, and PRC from "See Chart Supplement for D/E(surf) eff hrs" to "See Chart Supplement for D eff hrs", to reflect the fact that none of the surface-level Class E airspace at these airports vanishes (converts to Class G airspace) when the control tower is closed. If this suggestion were implemented, a pilot encountering the “See Chart Supplement for D/E(surf) eff hrs” on any VFR sectional chart could be confident that all the surface-level controlled airspace at that airport converted to Class G airspace when the tower was closed, and would only need to consult the Chart Supplement if he or she wished to know the actual time schedule of when the control tower was open and when the control tower was closed.

It is understandable that charting personnel may have experienced some confusion about the status of the surface-level controlled airspace at these eleven airports during the hours that the control towers were closed. The “Airspace Designations and Reporting Points” document (FAAO 7400.11E) is very complex, and actually has four different ways of describing the status of surface-level controlled airspace at an airport with a part-time control tower, with part-time Class D airspace and a surface-level Class E (E4) "extension". Readers interested in exploring these four different styles of airspace description in more detail may wish to peruse Attachment B. However, it is not really necessary to thoroughly understand this additional supplemental material in order to understand the basis for this suggestion. The key point is simply that regardless of the details of the airspace descriptions in the “Airspace Descriptions and Reporting Points” document, the Chart Supplement makes it clear that at each of these eleven airports, all the surface-level controlled airspace becomes surface-level Class E airspace during the hours that the control tower is closed.

The exact language in the Chart Supplement regarding the status of the surface-level controlled airspace for each of the eleven airports that are the focus of this suggestion, as well as some other airports, is given in Attachment A.
Comments:

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Date: April 2, 2021

Please send completed form and any attachments to:
9-AMC-AVS-ACM-Info@faa.gov
Attachment A

A detailed listing of all airports mentioned in this suggestion follows, including the eleven airports that are the main focus of this suggestion, as well as some other airports mentioned in Attachment B.

In the listings below, the page references beginning with "D" or "E" refer to the Class D, E2, and E4 listings in FAAO 7400.11E.

After these page numbers, I've provided the actual text of the portion of the E4 airspace description from FAAO 7400.11E --if any-- that describes any limitation in the effective hours of the E4 airspace.

And after this text, I've provided the text in the Chart Supplement that describes the effective hours of the Class D airspace and indicates whether it converts to Class G or to surface-level class E when the tower is closed. By virtue of Section 3-2-6 e 2 in the Airman’s Information Manual, we can be confident that the airspace in the "extensions" will also convert to Class G whenever the Class D airspace converts to Class G, and will remain surface-level Class E airspace at all other times.

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"Group 1"-- "GCN" given as an example--there are many others

GCN (Phoenix sectional chart and Grand Canyon VFR chart)  
AWP AZ Grand Canyon, AZ  
Grand Canyon National Park Airport, AZ  
D-138-139, (no E2 airspace description given), E-211

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during the specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

"Group 2"-- "MFR" given as an example-- there are dozens of others, as this is the most common way that the airspace descriptions are formulated at a Class D airport with a part-time control tower and an E4 Class-E-to-surface extension

MFR (Klamath Falls sectional chart)
ANM OR Medford, OR
Rogue Valley International-Medford Airport, OR
D-65, E-78-79, E-191

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 153 of 2-25-21 edition of NW Chart Supplement includes: "AIRSPACE: CLASS D svc 1400–0500Z‡; other times CLASS E."

"Group 3" airports where the airspace is notated "See NOTAMS/Supplement for Class D eff hrs":

ITH (New York sectional chart)
AEA NY Ithaca, NY
Ithaca Tompkins Regional Airport, Ithaca, NY
D-19, E30-31, E-169

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 206 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 1130–0300Z‡; other times CLASS E."

POU (New York sectional chart)
AEA NY Poughkeepsie, NY
Dutchess County Airport, Poughkeepsie, NY
D-20, E-32, E-169

(No notation of limited effective hours in E4 airspace description in JO 7400.11E)

LNS (New York sectional chart)
AEA PA Lancaster, PA
Lancaster Airport, PA
D-23, E-35, E-171

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 284 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 1100–0400Z‡; other times CLASS E."

RDG (New York sectional chart)
AEA PA Reading, PA
Reading Regional Airport/Carl A. Spaatz Field, PA
D-24, E-36, E-172

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)


IPT (New York sectional chart)
AEA PA Williamsport, PA
Williamsport Regional Airport, PA
D-25, E-36, E-173

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 318 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 1130–0330Z‡; other times CLASS E."

LYH (Cincinnati sectional chart)
AEA VA Lynchburg, VA
Lynchburg Regional-Preston Glenn Field Airport, Lynchburg, VA
D-27, E-37-38, E-173-174

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 359 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 1130–0330Z‡; other times CLASS E."
APN (Lake Huron sectional chart)  
AGL MI Alpena, MI  
Alpena County Regional Airport, MI  
D-36, E-44, E-177

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 148 of 2-25-21 edition of EC Chart Supplement includes: "AIRSPACE: CLASS D svc 1300–2100Z‡ Mon–Fri exc hol; other times CLASS E."

STC (Twin Cities sectional chart)  
AGL MN D St. Cloud, MN  
St. Cloud Regional Airport, MN  
D-41, E-53, E-179

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 196 of 2-25-21 edition of NC Chart Supplement includes: "AIRSPACE: CLASS D svc 1300–0500Z‡; other times CLASS E."

"Group 3" airports where the airspace is notated "See NOTAMS/Supplement for Class D/E(sfc) eff hrs":

MKG (Chicago sectional chart)  
AGL MI Muskegon, MI  
Muskegon County Airport, MI  
D-39, E-46-47, E-178

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 216 of 2-25-21 edition of EC Chart Supplement includes: "EC AIRSPACE: CLASS D svc 1100–0400Z‡; other times CLASS E."

RST (Chicago sectional chart)  
AGL MN Rochester, MN  
Rochester International Airport, MN  
D-41, E-52, E-179

(No notation of limited effective hours in E4 airspace description in JO 7400.11E)
Page 194 of 2-25-21 edition of NC Chart Supplement includes: "AIRSPACE: CLASS D svc 1100–0500Z‡; other times CLASS E."

RAP (Cheyenne sectional chart)
AGL SD Rapid City, SD
Rapid City Regional Airport, SD
D-47, E59-60, E-182

(No notation of limited effective hours in E4 airspace description in FAAO 7400.11E)

Page 397 of 2-25-21 edition of NC Chart Supplement includes: "AIRSPACE: CLASS D svc 1300–0500Z‡; other times CLASS E."

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"Group 4" airports where the airspace is notated "See NOTAMS/Supplement for Class D eff hrs":

ENA/PAEN (Anchorage and Seward sectional charts)
AAL AK Kenai, AK
Kenai Municipal Airport, AK
D-5, E-7, E-159

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during the specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

Page 148 of 2-25-21 edition of AK Chart Supplement includes: "AIRSPACE: CLASS D svc 1500–0700Z‡ May 1–Sept 30, 1600–0600Z‡ Oct 1–Apr 30; other times CLASS E"

"Group 4" airports where the airspace is notated "See NOTAMS/Supplement for Class D/E(sfc) eff hrs":

GCK (Wichita sectional chart)
ACE KS Garden City, KS
Garden City Regional Airport, KS USA
D-7, E-17, E-161

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during the specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."
Page 95 of 2-25-21 edition of NC Chart Supplement includes: "AIRSPACE: CLASS D svc 1300–0300Z‡; other times CLASS E"

JEF (Kansas City sectional chart)
ACE MO Jefferson City, MO
Jefferson City Memorial Airport, MO
D-11, E-21, E-164

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during the specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

Page 223 of 2-25-21 edition of NC Chart Supplement includes: "AIRSPACE: CLASS D svc 1200–0330Z‡; other times CLASS E"

NHK (Washington sectional chart)
AEA MD Patuxent River, MD
Patuxent River NAS (Trapnell Field), MD
D-15, E-28, E-167

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport Facility Directory."

Page 107 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 1200–0400Z‡ Mon–Fri, 1300–2300Z‡ Sat–Sun, clsd hol; other times CLASS E."

CXY (New York sectional chart)
AEA PA Harrisburg, Capital City Airport, PA
Capital City Airport, Harrisburg, PA
D-22, E-35, E-171

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during the specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

Page 279 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 1200–0200Z‡; other times CLASS E."
UNV (Detroit sectional chart)
AEA PA State College, PA
University Park Airport, PA
D-25, E-36, E-172

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

Page 319 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 1100–0300Z‡; other times CLASS E."

NTU (Washington sectional chart)
AEA VA Oceana NAS, VA
Oceana NAS (Apollo Soucek Field), VA
D-28, E-38-39, E-174

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

Page 367 of 2-25-21 edition of NE Chart Supplement includes: "AIRSPACE: CLASS D svc 0500–0459Z‡; other times CLASS E."

GFK (Twin Cities sectional chart)
AGL ND Grand Forks, ND
Grand Forks International Airport, ND
D-43, E-55, E-180

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during the specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

Page 323 of 2-25-21 edition of NC Chart Supplement includes: "AIRSPACE: CLASS D svc 1200–0530Z‡; other times CLASS E."
PRC (Phoenix sectional chart)
AWP AZ Prescott, AZ
Ernest A. Love Field, AZ
D-140, E-129, E-212

E4 description in FAAO 7400.11E includes the following: "This Class E airspace area is effective during the specific dates and times established in advance by a Notice to Airmen. The effective date and time will thereafter be continuously published in the Airport/Facility Directory."

Page 67 of 2-25-21 edition of SW Chart Supplement includes: "AIRSPACE: CLASS D svc 1300–0500Z; other times CLASS E."
Attachment B—supplemental information- a deeper exploration of the “Airspace Designations and Reporting Points” document FAAO 7400.11E.

**This information is purely supplemental in nature. It is not really necessary to thoroughly understand this additional supplemental material in order to understand the basis for this suggestion.**

Readers who feel they already thoroughly understand the suggestion may safely skip this additional content.

The central point that is at the heart of this suggestion is that regardless of the exact details of the airspace descriptions in the “Airspace Descriptions and Reporting Points” document, the Chart Supplement makes it clear that at each of the eleven airports that are the focus of this suggestion, all the surface-level controlled airspace becomes surface-level Class E airspace during the hours that the control tower is closed. That point has already been adequately explored in the main submission, and in “Attachment A”.

However, this attachment may be of interest to readers wishing to gain a deeper understanding of the various different ways that the “Airspace Designations and Reporting Points” document FAAO (7400.11E) describes the airspace associated with an airport with a part-time control tower, with Class D airspace and an adjoining surface-level Class E (E4) "extension".

FAAO 7400.11E actually has four different ways of describing the airspace associated with an airport with a part-time control tower, with Class D airspace and an adjoining surface-level Class E (E4) "extension". Let's go through them each in detail, and notice which chart notation is used at present in each case, and which chart notation would be better used instead.

For convenience, we'll designate these four different cases as "Group 1", "Group 2", "Group 3", and "Group 4". This is just a handy shorthand to try to streamline this communication.

The reader should keep in mind that "Groups" 2, 3, and 4 are functionally equivalent: in each case, the entire airspace converts to surface-level Class E airspace when the tower is closed. From a pilot's viewpoint, "Groups" 2, 3, 4 are all identical. Therefore they should logically all bear the same chart notation-- the "See Chart Supplement for D eff hrs" chart notation. That is not the case at present. Implementing the present suggestion would change this.

"Group 1": The Chart Supplement makes it clear that the surface-level controlled airspace all converts to Class G airspace when the tower closes. In the airspace descriptions in FAAO 7400.11E, the Class D description and the E4 description both have a note to see the Airport/Facility directory (old term) or Chart Supplement (new term) for the effective hours of that airspace. Example: GCN, Grand Canyon National Park Airport, Grand Canyon AZ.

In such cases, the VFR sectional chart is invariably noted "See NOTAMS/Supplement for Class D/E(sfc) eff hrs". This makes complete sense; there is no need to change this. Both the Class D and the surface-level Class E airspace have the same limited hours. Pilots are alerted that the Class D airspace and the Class-E-to-surface airspace all vanish when the tower is closed.
"Group 2": The Chart Supplement makes it clear that the surface-level controlled airspace all converts to surface-level Class E airspace when the tower closes--just like in "Groups" 3 and 4. In the airspace descriptions in FAAO 7400.11E, the E2 surface-level Class E airspace footprint is identical to the Class D footprint, and does not include the E4 surface-level Class E "extension". In the airspace descriptions, the Class D description and the E2 description both have a note to see the Airport/Facility directory (old term) or Chart Supplement (new term) for the effective hours. In the airspace descriptions, the E4 description has no note of any limitation in the effective hours. In the Chart Supplement itself, there is no suggestion that there might be any time segment when any of the surface-level controlled airspace reverts all the way to Class G--it is always either Class D airspace or surface-level Class E airspace. Example: MFR, Rogue Valley International - Medford Airport, Medford OR. This is the most common way that part-time Class D airspace with an E4 extension is handled--there are dozens of other examples.

In such cases, the sectional chart is invariably noted "See NOTAMS/Supplement for Class D eff hrs". This makes complete sense; there is no need to change this. There is no suggestion that the surface-level Class E airspace may have limited effective hours. Pilots are alerted that when the tower closes, the Class D airspace disappears but surface-level Class E airspace does not disappear. Even without checking the Chart Supplement, pilots can deduce that all the surface-level controlled airspace must become surface-level Class E airspace when the tower is closed.

"Group 3": The Chart Supplement makes it clear that the surface-level controlled airspace all converts to surface-level Class E airspace when the tower closes--just like in "Groups" 2 and 4. In the airspace descriptions in FAAO 7400.11E, the E2 surface-level Class E airspace footprint includes the E4 surface-level Class E "extensions" as well as the Class D airspace. In the airspace descriptions, the Class D description and the E2 description both have a note to see the Airport/Facility directory (old term) or Chart Supplement (new term) for the effective hours. The implication is that the E2 airspace is in effect whenever the Class D airspace is not. In the airspace descriptions, the E4 description has no note of any limitation in the effective hours. But there appears to be a presumption that the E4 airspace is superseded by the E2 airspace whenever the E2 airspace is in effect--i.e. whenever the Class D airspace is not in effect. Otherwise the airspace in the "extensions" would have to be construed to be simultaneously E2 and E4 whenever the tower was closed, which seems unlikely. So it appears that the "extensions" are intended to convert from E4 to E2 whenever the Class D airspace is not in effect. At any rate, regardless of the exact status of the "extensions" when the tower is closed, the point of relevance to pilots is that the "extensions" are surface-level Class E airspace 24/7, and the Class D footprint converts to surface-level Class E airspace when the tower is closed. So all the surface-level controlled airspace is surface-level Class E airspace whenever the tower is closed. In the Chart Supplement itself, there is no suggestion that there might be any time segment when any of the surface-level controlled airspace reverts all the way to Class G airspace--it is always either Class D airspace or surface-level Class E airspace. (See the actual excerpts from the Chart Supplement for all the "Group 3" airports in Attachment A.)

In such cases, the sectional chart is usually noted "See NOTAMS/Supplement for Class D eff hrs." The specific examples that I'm aware of are ITH, POU, LNS, RDG, IPT, LYH, APN, and STC. (See Attachment A for full names, and page numbers in FAAO 7400.11E.) Again, this
makes complete sense. There is no suggestion that the surface-level Class E airspace may have limited hours. Pilots are alerted that when the tower closes, the Class D airspace disappears but surface-level Class E airspace does not disappear. Even without checking the Chart Supplement, pilots can deduce that all the surface-level controlled airspace must convert to surface-level Class E airspace when the tower is closed.

However, in some cases where the airspace is described this way, the sectional chart is noted "See NOTAMS/Supplement for Class D/E(sfc) eff hrs." The specific examples that I'm aware of are MKG, RST, and RAP. (See Attachment A for full names, and page numbers in FAAO 7400.11E.) This is confusing, because it suggests that the airspace may be configured as in "Group 1" above, like at GCN, where the surface-level controlled airspace vanishes (converts to Class G airspace) when the tower is closed. As a result of this choice of notation for these airports, any time that pilots encounter the notation "See NOTAMS/Supplement for Class D/E(sfc) eff hours", they are forced to consult the Chart Supplement to find out whether the associated surface-level controlled airspace converts to surface-level Class E airspace, or to Class G airspace, when the tower is closed.

"Group 4": The Chart Supplement makes it clear that the surface-level controlled airspace all converts to surface-level Class E airspace when the tower closes-- just like in "Groups" 2 and 3. In the airspace descriptions in FAAO 7400.11E, the E2 surface-level Class E airspace footprint includes the E4 surface-level Class E "extensions" as well as the Class D airspace, just like in "Group 3". However, unlike "Group 3", for the "Group 4" airports, in the airspace descriptions, the Class D description and the E2 description and the E4 description all have a note to see the Airport/Facility directory (old term) or Chart Supplement (new term) for the effective hours. If the "extensions" were to convert to Class G at any time that the Class D footprint did not convert also to Class G, then that would contradict AIM 3-2-6 e 2, as noted above. Fortunately, a look at the "Chart Supplement" eliminates this possibility-- nothing in the Chart Supplement for any of these "Group 4" airports suggests that there's ever a time segment when any of the surface-level controlled airspace reverts all the way to Class G-- it is always either Class D airspace or surface-level Class E airspace. Nothing in the Chart Supplement for any of these "Group 4" airports suggests that the E4 "extensions" might ever vanish, i.e. revert all the way to Class G airspace. The implication is that the entire E2 airspace is in effect whenever the Class D airspace is not in effect, and the E4 airspace is in effect only when the E2 airspace is not in effect, i.e. only when the Class D airspace is in effect. So the "extensions" must convert from E4 to E2 when the tower is closed-- just as seems to be intended for "Group 3".

In such cases, the VFR sectional chart is usually noted "See NOTAMS/Supplement for Class D/E(sfc) eff hrs". The specific examples that I'm aware of are GCK, JEF, NHK, CXY, UNV, NTU, GFK, and PRC. (See Attachment A for full names, and page numbers in JO 7400.11E.) I would suggest that -- just as is the case for the MKG, RST, and RAP -- this is confusing, because it suggests that the airspace may be configured as in "Group 1" above, like at GCN, where the surface-level controlled airspaces vanishes when the tower is closed. As a result of this choice of notation for these airports, any time that pilots encounter the notation "See NOTAMS/Supplement for Class D/E(sfc) eff hrs", they are forced to consult the Chart Supplement to find out whether the associated surface-level controlled airspace converts to surface-level Class E airspace, or to Class G airspace, when the tower is closed.
However, in at least one case where the airspace is described this way, the sectional chart is noted "See NOTAMS/Supplement for Class D eff hrs". This is how the chart is noted in the case of Kenai Municipal Airport (ENA/PAEN). My suggestion is that this is really the best chart notation for all of the "Group 4" airports, as well as all of the "Group 3" airports and all of the "Group 2" airports. This notation offers no suggestion that the surface-level Class E airspace may have limited hours. With this notation, pilots are alerted that when the tower closes, all the surface-level controlled airspace at these airports become surface-level Class E airspace.

A detailed listing of all airports mentioned here, including the 11 airports that are the focus of this suggestion, are provided in Attachment A.

A note in closing: ever since the 1993 “alphabet” airspace re-designation, there has arguably been some regulatory ambiguity about whether E2 airspace and E3/E4 airspace are exactly equivalent from a regulatory point of view. The central question is whether the phrase "surface area of Class E airspace designated for an airport", and other similar phrases, should be construed to include E4 airspace as well as E2 airspace, or only E2 airspace. This phrase, or similar phrases, appears in about a dozen different FARs, including FAR 103.17, 91.157(a), 91.155(d), 91.303(c), 91.309(a)(4), 101.33(a), 135.205(b), 91.155(c), 45.22(a)(3)(ii), FAR 121.347(a)(2), 107.41, and the 2018 "Recreational Exception" for small unmanned aircraft (49 USC 44809). The author of this suggestion is aware of four different FAA publications that suggest that this phrase and similar phrases should be construed to apply to E2 airspace but not E4 airspace. However, this seems to be very much an "outlier" view, which seems to be inconsistent with the majority of actual practice (at least if we exclude the realm of unmanned aircraft operations)—for example, the Airman's Information Manual makes no reference to any regulatory distinction between E2 and E3/E4 airspace. This “outlier” view also seems to be inconsistent with the original intent of the FAA at the time that these FARs (apart from FAR 107.41, which is more recent) were converted from their original language to new language that was congruent with the new "alphabet" airspace definitions introduced in 1993. The "mainstream" and most supportable view seems to be that all regulations that apply to E2 airspace should also be construed to apply to E3/E4 airspace.

Readers wishing to explore this issue in more detail may wish to correspond further with the author of this suggestion—I have an additional Word document on this subject that I’d be happy to send out-- or to visit https://aviation.stackexchange.com/questions/74738/what-indication-has-the-faa-given-that-phrases-like-surface-area-of-class-e-air , https://aviation.stackexchange.com/questions/64246/what-are-the-historical-precedents-of-todays-e2-and-e4-airspace-us , and other related documents linked from these documents.

It is conceivable that if the FAA ever issues further clarification on this point, it might actually result in an increased need to differentiate between E2 airspace and E4 airspace on the VFR sectional charts, or in the Chart Supplement.

However the present suggestion is written from the viewpoint that E2 and E4 airspace should be considered to be functionally equivalent from a pilot's point of view, because both are surface-level Class E airspace.
More to the point, regardless of any ambiguity about whether or not there is any regulatory distinction between E2 airspace and E4 airspace, the designers of the current charting conventions have clearly chosen not to attempt to inform pilots whether a given surface-level Class E airspace is E2 airspace or E4 airspace—witness the non-towered airports SIU, BIH, and SIT/PASI, each of which have surface-level class E (E4) “extensions” to surface-level Class E (E2) airspace. In each case, the boundary between the E2 "Surface Area" surrounding the airport and the adjoining E4 "extension" is not marked on the VFR sectional charts. Nothing in the legend of the VFR sectional charts suggests any attempt to distinguish E2 airspace from E4 airspace. The Chart Supplement makes no reference to any distinction between E2 and E4 airspace. The present suggestion is congruent with the current practice, in that it makes no attempt to distinguish E2 airspace from E4 airspace on the VFR sectional charts. To do otherwise would require a substantial revision (and complication) of the charting conventions and/or the language in the "Chart Supplement", especially in the cases of the "Group 3" and "Group 4" airports discussed here, where the airspace in the "extensions" actually switches between E2 and E4 depending on whether the control tower is open or closed. The present suggestion is written from the viewpoint that attempting to differentiate between E2 and E4 airspace on the VFR sectional charts and/or the Chart Supplement would represent an unnecessary complication.