

AERONAUTICAL CHARTING MEETING
Charting Group
Meeting 22-01 – April 26-28, 2022

RECOMMENDATION DOCUMENT

FAA Control #22-01-368

Subject: Inconsistent Depiction of Special-Use Airspace

Background/Discussion:

Special Use Airspace (SUA) boundaries will be depicted on charts when called out on Form 8260. This can lead to inconsistent depiction of SUAs between various charts underlying the same airspaces.

For example, two IAPs to the same runway at KMTN depict very different sets of SUA – the LDA Rwy 33 includes the Washington, DC SFRA and the Washington Class B, whereas the RNAV Rwy 33 only shows the two R-Areas:

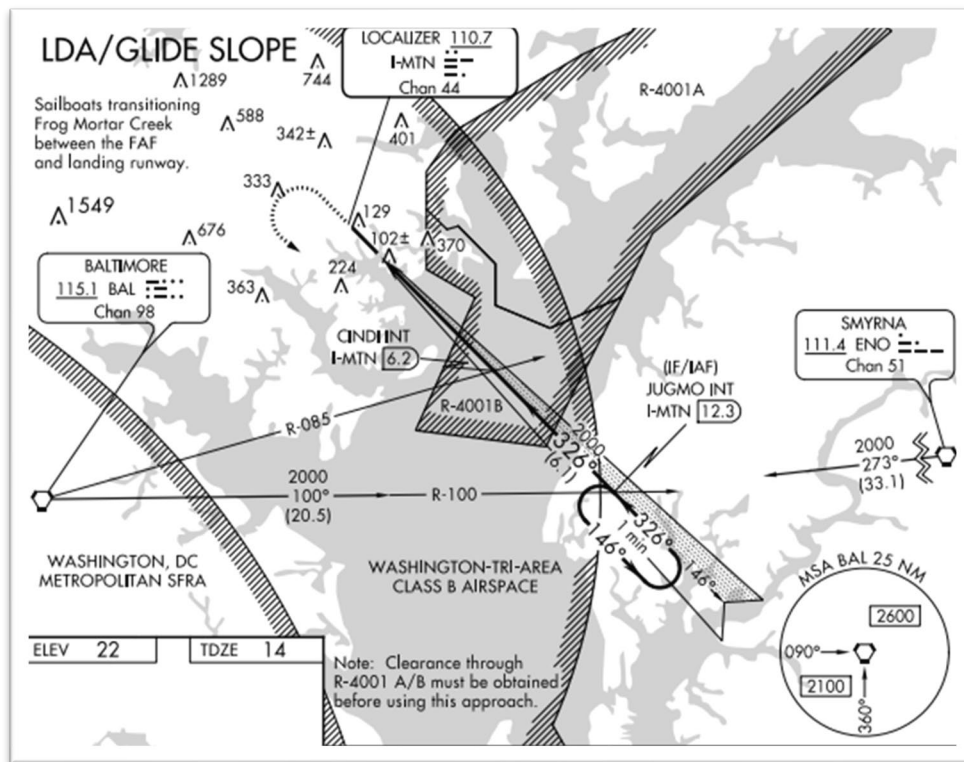


Figure 1: KMTN LDA RWY 33

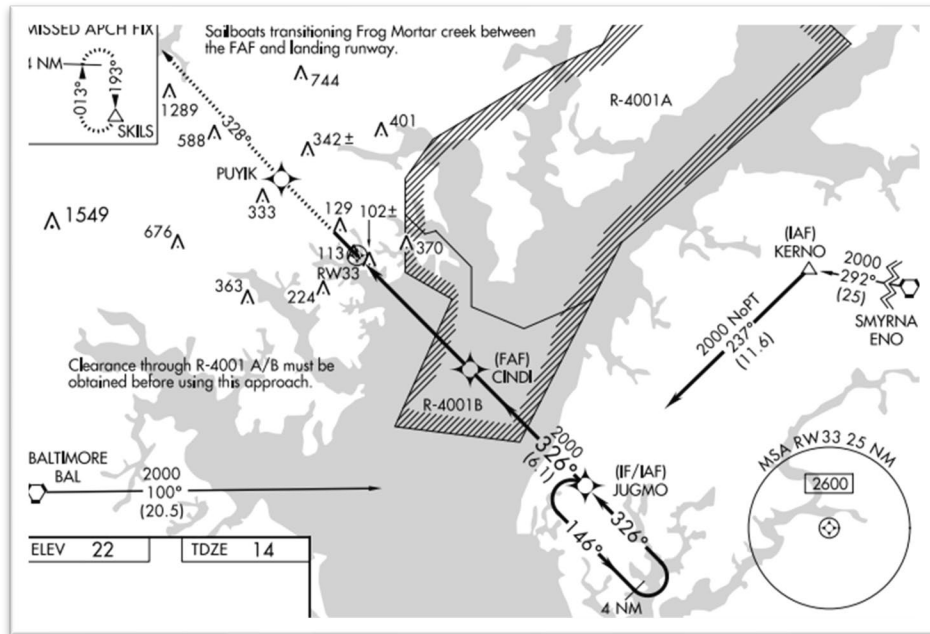


Figure 2: KMTN RNAV RWY 33

Similar inconsistencies exist in areas where two nearby airports underlie SUAs, as illustrated by 00U and M46. Powder River 1A Low and 1B Low both begin at 500 AGL, but the MOAs are only shown on the 00U IAP, not the M46 IAPs, even though both MOAs could be equally impactful (or equally irrelevant) to IFR traffic:

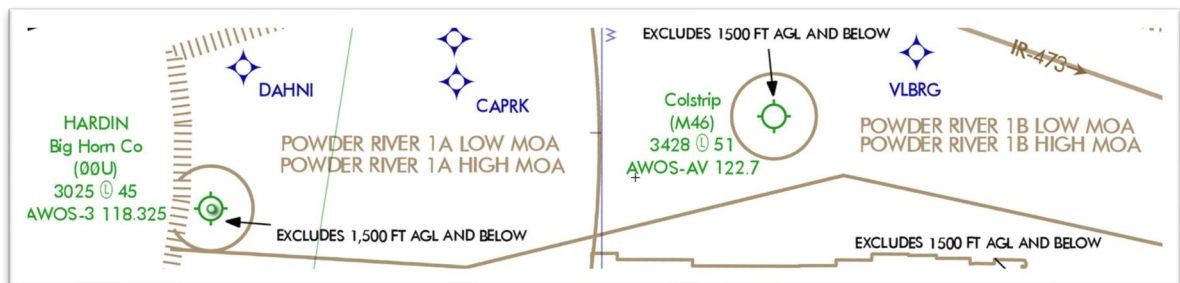


Figure 3: IFR ENR showing 00U and M46 with overlying SUAs

MOA NAME	ALTITUDE*
POWDER RIVER 1A HIGH	12,000 MSL
POWDER RIVER 1A LOW	500 AGL TO BUT NOT INCLUDING 12,000 MSL
POWDER RIVER 1B HIGH	12,000 MSL
POWDER RIVER 1B LOW	500 AGL TO BUT NOT INCLUDING 12,000 MSL
POWDER RIVER 1C HIGH	12,000 MSL

Figure 4: MOA Name/Altitude Table

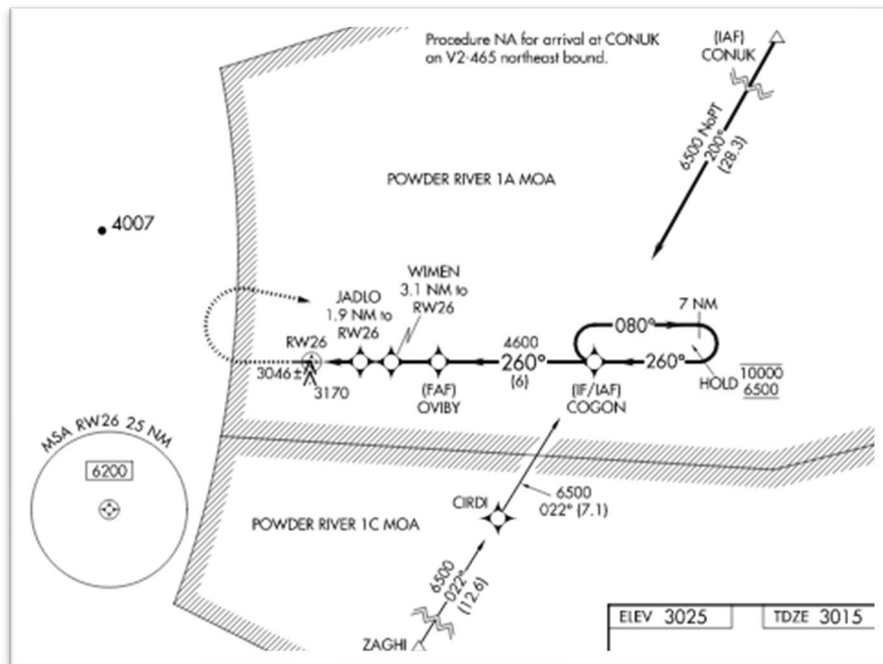


Figure 5: 00U RNAV Rwy 26 IAP

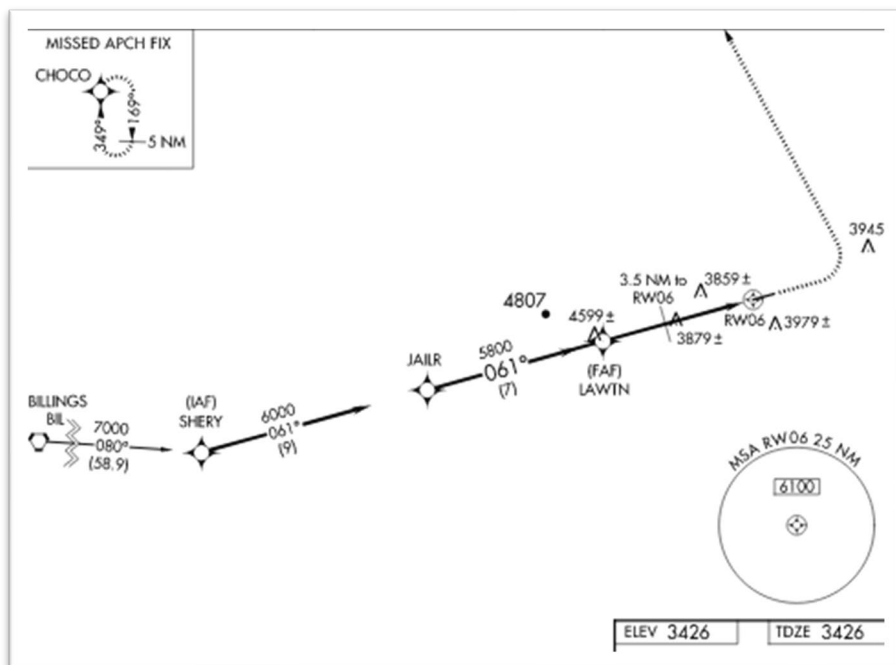
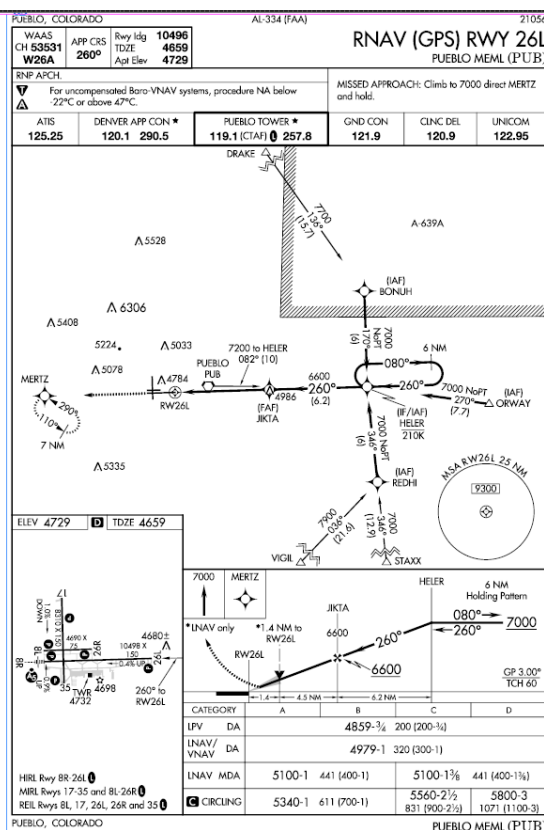
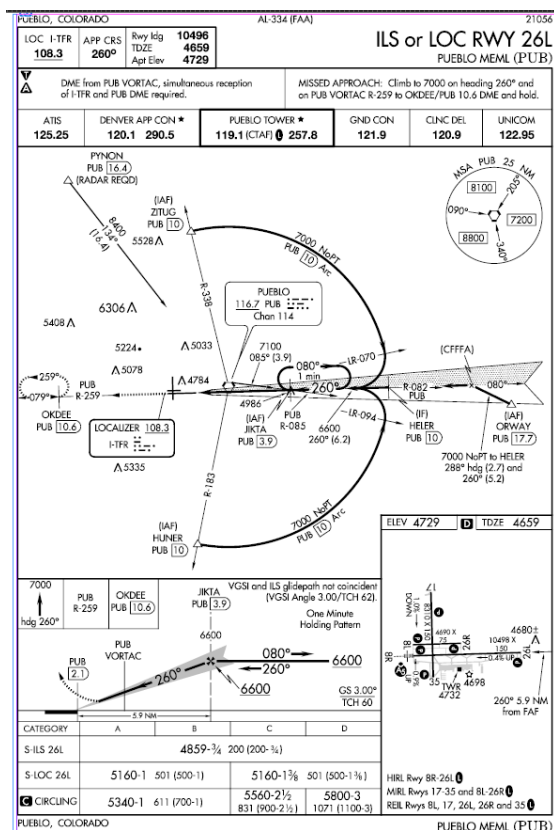


Figure 6: M46 GPS Rwy 6 IAP

Here are other examples:

KPUB ILS or LOC 26L vs RNAV 26L

While this was a charting error (Alert Area does not exist anymore), why was an Alert Area shown in the first place?



Recommendations:

Garmin recommends revising the following:

- Policy regarding what types of SUA are relevant to IFR operations, and thus worthy of charting (MOA, R-Area, P-Area, Controlled Airspace, etc)
- Policy regarding procedure amendment to avoid one IAP chart more cluttered with SUA than others nearby

IAP depiction of SUAs should be consistent across all IAPs, and procedure amendments removing certain SUAs from charts should encompass all IAPs with the same SUA.

Comments:

More information is presented via attached PowerPoint presentation.

Submitted by: Steven Madigan
Organization: Garmin International
Phone: 913.440.6025
E-mail: Steven.Madigan@garmin.com
Date: 03/15/2022

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

MEETING 22-01

Steve Madigan, Garmin, [briefed](#) the audience on the inconsistent depiction of Special Use Airspace (SUA) areas on terminal charts. He explained that for Instrument Approach Procedures (IAPs), FAA Form 8260 will direct certain types of SUAs to be charted, but it is not always requested on all the 8260s for a given airport resulting in inconsistent charting of the SUAs. Examples are shown on [slides 3-8](#). Garmin recommends revising the policies regarding what types of SUA are relevant to IFR operations and worthy of charting. They also recommend the depiction of SUAs be consistent across all charts and chart types at an airport and a procedure amendment process involving removing SUAs should encompass all procedures where the SUA is depicted.

Valerie Watson, FAA/AJV-A250, clarified that SUAs are only shown on charts when specifically requested on the 8260. FAA Order 8260.19 states SUAs will be shown “as deemed necessary.” What are being characterized as inconsistencies are actually the result of deliberate choices made by Instrument Flight Procedure (IFP) design.

Johnnie Baker, FAA/AJV-A441, said the decision made by the procedure designer depends on whether or not the SUA will impact the specific procedure. Steve asked if that decision is documented. Johnnie said it is often documented on the back of the FAA Form 8260-9. Johnnie also pointed out IFP designs procedures by request, so not every procedure at a given airport is worked for the same effective date. This may lead to inconsistencies.

Diane Adams-Maturo, FAA/AFS-420, said Air Traffic Control (ATC) or the Flight Procedures Team (FPT) can request that a SUA be added to a specific procedure or not. She explained that there are a lot of factors involved but ultimately the request to chart an SUA on an individual procedure is up to the procedure designer.

Bill Tuccio, Garmin, asked if the size of the planview is taken into account when a decision is made about whether to request an SUA for charting on a given procedure. Krystle Kime, FAA/AJV-A222, pointed out that if an SUA is requested on the 8260, but doesn't fit within the boundary of the planview, it is not charted. The standard 500,000:1 scale of these charts is NOT revised to accommodate an SUA.

Valerie asked if the guidance in the 8260.19 is sufficient or if it should stipulate that SUAs should be charted consistently for all procedures at a given airport. Jeff Rawdon, FAA/AFS-420, said he does not think Flight Standards will want to make that change and he thinks it should remain at the discretion of the local facilities and the procedure designers. He also said he would take this question back for further discussion with the Flight Procedures and Airspace Group. Dan Wacker, FAA/AFS-420, pointed out that this issue also affects FAA Order 8260.46 for Departure Procedures.

STATUS: OPEN

ACTION: Jeff Rawdon, FAA/AFS-420, and the Flight Procedures and Airspace Group will review the criteria in FAA Orders 8260.19 and 8260.46 regarding the charting of Special Use Airspace Areas.

MEETING 22-02

Jeff Rawdon, FAA/AFS-420, said there was an ACM Recommendation Review Group (ARRG) discussion of this issue and the decision was made to accept this proposal for further assessment. Currently FAA Order 8260.19 says “When a procedure plan view area encompasses Special Use Airspace (SUA), use the following note as deemed necessary: ‘Chart P-56.’”. There is concern this is not done consistently as there are many instances of two procedures at the same airport that show SUAs differently. Jeff said the ARRG arrived at several options for which public feedback is desired: (1) Never chart special use airspace on IAPs, (2) Chart only prohibited areas on IAPs, or (3) Adopt criteria similar to that within ICAO Annex 4, which reads “prohibited areas, restricted areas, and danger areas which may affect the execution of the procedures shall be shown with their identification and vertical limits”.

Bill Tuccio, Garmin, voiced that, in his opinion, Special Use Airspace areas seem unnecessary to chart on an instrument procedure that has undoubtedly been designed to avoid them. Military Operations Areas (MOAs) are more debatable. Bill said the FAA may need to consider continuing to chart these areas on IFR approaches for pilots conducting practice approaches under visual flight rule (VFR) conditions. Joel Dickinson, FAA/AFS-410, said these procedures are built to protect only Instrument Approach Procedures (IAPs). The fact that pilots fly them for practice under visual conditions may not be enough of a reason to put them on IAPs. Bill agreed that if a pilot is cleared by Air Traffic Control (ATC), none of these areas need to be depicted.

John Moore, Jeppesen/Boeing, asked if the FAA is proposing to adopt the ICAO standard and only depict three types of SUAs. He thinks the FAA would need much wider vetting for that kind of change. Jeff said the exact wording of the text would need to be made compliant with U.S. airspace area terminology with consideration given to differences with ICAO language.

Pat Mulqueen, FAA/AJV-A440, explained that Air Traffic tells procedure designers what needs to be depicted on specific procedures. The Instrument Flight Procedures (IFP) group honors these requests and in doing so consider they are following the “as deemed necessary” clause in the 8260.19 guidance. Bruce McGray, FAA/AFS-410, said he thinks it should be up to the controlling agency responsible for that airspace to determine what should be charted.

Steve Madigan, Garmin, said if ATC wants something charted he doesn’t intend to disagree with them. He said the problem still remains that they are charted inconsistently across procedures at a single airport.

Valerie Watson, FAA/AJV-A250, suggested adding something to FAA Order 8260.19 so when an SUA is requested for charting, an assessment is done to evaluate other procedures at that airport. Dan said that is already documented in FAA Order 8260.3. Pat said ATC may have a good reason why an SUA is shown on one procedure and not another.

Steve said the rationale for some of these seems to be that they have been on the chart for 40 years. He asked if charted SUAs are questioned when doing periodic reviews of

these procedures. Pat said it is part of the periodic review process and deactivated SUAs will be removed. Steve clarified he's talking about a periodic review of all areas, not just those that no longer exist. Pat said when procedures are submitted for amendment, there is a checklist of items they look at, but they don't go back and ask the local ATC to justify anything they previously requested.

Valerie asked if the audience agrees that ATC should have the option to request SUAs be depicted on specific charts. Dan said yes, if they have a valid reason for the request. Valerie asked what criteria Instrument Flight Procedures (IFP) should use when following up with ATC to justify these areas. Dan said he will work on this issue with ATC outside of the ACM. He will then will work to clarify the criteria for when SUAs should be shown.

Jeff Rawdon summarized the discussion and said he thinks there is ACM agreement that ATC should have the ability to request an SUA be charted if it meets certain criteria. He suggested adding words similar to the ICAO language. He said the Flight Procedures and Airspace Group will take this back for more internal discussions to determine how they will proceed with potential criteria changes.

STATUS: OPEN

ACTION: Jeff Rawdon, FAA/AFS-420, and the Flight Procedures and Airspace Group will report back on updates to Flight Standards criteria regarding the charting of Special Use Airspace Areas.

MEETING 23-01

Jeff Rawdon, FAA/AFS-420, reported the Flight Procedures and Airspace Group is planning to discuss this issue with Air Traffic Control and then look at the criteria for when Special Use Airspace should be charted on Instrument Approach Procedures. He will report at the next meeting.

STATUS: OPEN

ACTION: Jeff Rawdon, FAA/AFS-420, and the Flight Procedures and Airspace Group will report on updates to Flight Standards criteria regarding the charting of Special Use Airspace areas.

MEETING 23-02

Jeff Rawdon, FAA/AFS-420, reported that Flight Standards has not been able to reach an internal agreement about how this issue should be handled. Flight Standards will continue to investigate and will report back at the next ACM.

STATUS: OPEN

ACTION: Jeff Rawdon, FAA/AFS-420, and the Flight Procedures and Airspace Group will report on updates to Flight Standards criteria regarding the charting of Special Use Airspace areas.

MEETING 24-01

Jeff Rawdon, FAA/AFS-420 informed the group that his responsibilities for this item have been turned over to Dan Wacker, FAA/AFS-420. Dan briefed that he has begun drafting language and is currently working through the Flight Standards process for a change to criteria. He said he would be able to update the ACM at the next meeting with the proposed changes.

Steve Madigan, Garmin, asked if Dan could provide a general idea of what the criteria changes will be. Dan said they haven't yet come to a full agreement on what the changes will be. He said that there is agreement that, when needed, certain types of airspace will get charted, however, they are still working to define which types of airspace would and would not get charted.

STATUS: OPEN

ACTION: Dan Wacker, FAA/AFS-420, and the Flight Procedures and Airspace Group will report on updates to Flight Standards criteria regarding the charting of Special Use Airspace areas.

MEETING 24-02

Daniel Wacker FAA/AFS-420, presented a [draft](#) of his proposed changes to the FAA Order 8260.19 criteria. The draft language states that only prohibited and restricted areas will be requested for charting, and only when their depiction is required for safe operation.

Rich Boll, NBAA, said NBAA will non-concur with not publishing prohibited areas. Prohibited areas are necessary for situational awareness. He also thinks that if a prohibited area is requested for charting, it should be shown on all Instrument Approach Procedures (IAPs) at that airport. He said NBAA concurs with the rest of the draft changes. Joel Dickinson, FAA/AFS-410 agreed that situational awareness is important, however, he thinks having this information on the IAP is unnecessary. We chart based on everything working operationally and the pilot following the rules. When that is the case, the extra information is nice to know, but it is not necessary. Dan said the criteria allows for exceptions to be taken, but there must be a valid reason for having the area depicted.

Bill de Groh, APA, said he also has concerns with not showing prohibited areas and APA would also non-concur with that change.

Benni Hutto, NATCA, thinks the option needs to be left open to depict prohibited areas on the chart and that air traffic control (ATC) should be included in the criteria as part of that decision. Gary Fiske, FAA/AJV-P310, agrees that ATC should be part of the coordination process and he does think that prohibited areas need to be depicted on IAPs for situational awareness.

Pat Mulqueen, FAA/AJV-A440, said he thinks it should be left up to ATC to make the call on charting depending on if they think aircraft will be impacted. He thinks the criteria should provide guidelines for when it is appropriate to request charting. He does not agree that Flight Standards should have to approve it before it can get charted. Dan disagreed and said it should be more than just ATC making the call. He then said after this discussion, he is leaning toward making prohibited areas a requirement.

Dan requested the formation of an ACM workgroup to investigate the necessary criteria changes. Requests to join the workgroup can go directly to Dan Wacker or an email can be sent to the ACM mailbox (9-amc-avs-acm-info@faa.gov).

STATUS: OPEN

ACTION: Dan Wacker, FAA/AFS-420, will report on the Special Use Airspace ACM Workgroup discussions.