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
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 4: MOA Name/Altitude Table

<table>
<thead>
<tr>
<th>MOA NAME</th>
<th>ALTITUDE*</th>
</tr>
</thead>
<tbody>
<tr>
<td>POWDER RIVER 1A HIGH</td>
<td>12,000 MSL</td>
</tr>
<tr>
<td>POWDER RIVER 1A LOW</td>
<td>500 AGL TO BUT NOT INCLUDING 12,000 MSL</td>
</tr>
<tr>
<td>POWDER RIVER 1B HIGH</td>
<td>12,000 MSL</td>
</tr>
<tr>
<td>POWDER RIVER 1B LOW</td>
<td>500 AGL TO BUT NOT INCLUDING 12,000 MSL</td>
</tr>
<tr>
<td>POWDER RIVER 1C HIGH</td>
<td>12,000 MSL</td>
</tr>
</tbody>
</table>

Figure 5: 00U RNAV Rwy 26 IAP

Procedure NA for arrival at CONUK on V2-465 northeast bound.
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.

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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.