Subject: Depiction of Wildlife, Seashore, and Other Non-Actionable Areas on IFR Charts

Background/Discussion:
Some IFR chart products depict wildlife/seashore areas based on Form 8260 directives.

Pictured below is the Muscatatuck National Wildlife Refuge on the KOVO RNAV RWY 5 approach, followed by depiction on the VFR sectional.
Pictured below is the Wheeler National Wildlife Refuge on the KHSV RNAV Runway 36R approach, followed by depiction on the VFR sectional.

**ADDITIONAL FLIGHT DATA:**
- CHART NOTE: ASR
- CHART CIRCLING ICON
- CHART R2104A, R2104B, R2104C
- CHART WHEELER NATIONAL WILDLIFE REFUGE
- CHART VDP AT 1.00 NM TO RW36R
- *LNAV ONLY
The purpose of charting these types of areas on IFR publications is unclear since they do not present a regulatory impact on pilots operating in the IFR system.

FAA AC 91-36D addresses these areas for VFR operations thusly:

**8. VOLUNTARY PRACTICES.**

a. Avoidance of noise-sensitive areas, if practical, is preferable to overflight at relatively low altitudes.

b. Pilots operating noise producing aircraft (fixed-wing, rotary-wing and hot air balloons) over noise-sensitive areas should make every effort to fly not less than 2,000 feet above ground level (AGL), weather permitting. For the purpose of this AC, the ground level of noise-sensitive areas is defined to include the highest terrain within 2,000 feet AGL laterally of the route of flight, or the uppermost rim of a canyon or valley. The intent of the 2,000 feet AGL recommendation is to reduce potential interference with wildlife and complaints of noise disturbances caused by low flying aircraft over noise-sensitive areas.

c. Departure from or arrival to an airport, climb after take-off, and descent for landing should be made so as to avoid prolonged flight at low altitudes near noise-sensitive areas.

d. This advisory does not apply where it would conflict with Federal Aviation Regulations, air traffic control clearances or instructions, or where an altitude of less than 2,000 feet AGL is considered necessary by a pilot to operate safely.

For pilots operating under IFR on published procedures the purpose of depicting these wildlife areas is much less clear. Altitude compliance is recommended in the best case, and TERPS procedure design should account for overflight of these areas. The KHSV case includes a migratory waterfowl note, but most similar cases do not.

**Recommendations:**
Garmin recommends against depiction of wildlife/seashore areas on IFR publications due to their lack of impact to IFR operations and negative affect by adding clutter to the chart. Where bird/wildlife activity is a significant hazard (see HSV), textual notes describing the hazard seem sufficient. In all other cases, these areas ought not to be shown on any IFR charts.

**Comments:**
In March 2022, Bill Tuccio from Garmin called an anonymous DPE operating near KOVO and asked about the Muscatatuck National Wildlife Refuge; he found it so irrelevant he never asked about it on an IFR checkride and expected applicants to dutifully ignore the wildlife refuge during an instrument approach (Tuccio paraphrase of conversation, any errors thereof are Tuccio’s own).

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Please send completed form and any attachments to:  
9-AMC-AVS-ACM-Info@faa.gov
MEETING 22-01

Steve Madigan, Garmin, briefed the new recommendation. He explained some Instrument Approach Procedure (IAP) charts depict wildlife/seashore areas as a result of charting being requested on the 8260 procedure source document. Steve said the purpose of charting these types of areas on IFR charts is unclear since they do not present a regulatory impact on pilots operating in the IFR system. Garmin recommends against depiction of wildlife/seashore areas on IFR publications due to their lack of impact and the negative effect of adding clutter to the chart.

Jeff Rawdon, FAA/AFS-420, said he thinks most of these areas are on the chart because the local facility requested it. All the same points that pertain to Requirement Document (RD) 22-01-368 also apply to this issue. Valerie Watson, FAA/AJV-A250, agreed and said there is vague guidance in FAA Order 8260.19 that the procedure designer can request items be charted at their discretion for situational awareness. She suggests having Flight Standards review the language in the 8260.19 and report back at the next ACM. Jeff agreed.

Bill Tuccio, Garmin, said charting these areas increases the cognitive workload for the pilot with no benefit. Pilots do not need this information. Mike Stromberg, UPS/IPA, agreed there is very little benefit to a pilot seeing this information since there is nothing to be done about it.

Rich Boll, NBAA, pointed out that if a pilot flies into one of these areas below 2000’ AGL, they may be in violation of a National Oceanic and Atmospheric Administration (NOAA) Code of Federal Regulations (CFR). He asked if the procedure designers consider that. Johnnie Baker, FAA/AJV-A441, said the 8260.19 does not directly address wildlife/seashore areas. Dan Wacker, FAA/AFS-420, said there is nothing in the FAA Orders 8260.46 that addresses them either. He sees no safety benefit to adding these areas. Diane pointed out that the 8260.19 addresses environmental requirements, but it doesn’t say specifically wildlife areas. The Operations Support Group (OSG), Flight Procedures Team (FPT), and Air Traffic Control (ATC) would determine whether the procedure was following the Environmental Policy Act. Dan agrees that Flight Standards needs to take a closer look at this issue.

John Moore, Jeppesen, said he doesn’t think the 8260.19 should be revised to restrict the charting of the graphic or note. He thinks it should be left open to the procedure designer so they can coordinate with the local facilities on items that are issues for that specific area. Steve said Garmin acknowledges that having a note would be preferable to a graphic depiction that clutters the final approach.

Johnnie added that the majority of the requests to depict these types of areas come from ATC and airport owners and operators who ask for them to be added as part of the original IFP request. Valerie asked if the designers ever go back to the submitter and question those request. Johnnie confirmed those discussion do happen.

STATUS: OPEN

ACTION: Jeff Rawdon, FAA/AFS-420, will coordinate a Flight Procedure and Airspace Group review of the guidance in FAA Orders 8260.19 and 8260.46 for the charting of wildlife, seashore, and other similar areas on Instrument Approach Procedures.