

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

RECOMMENDATION DOCUMENT

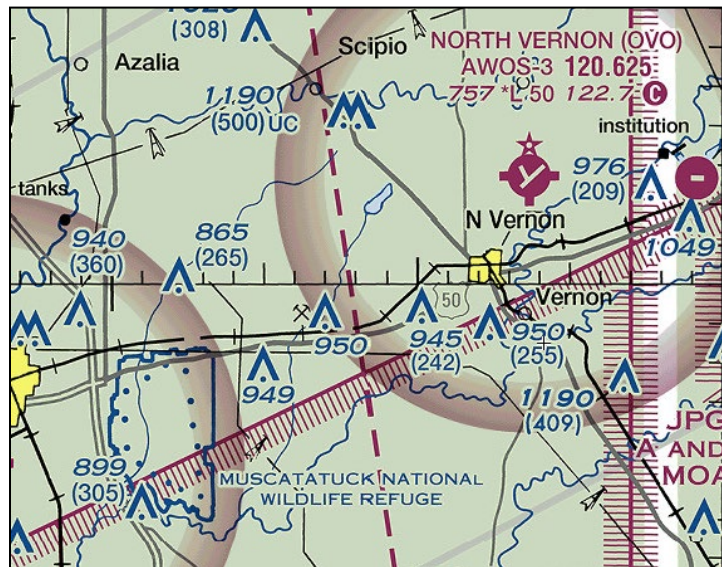
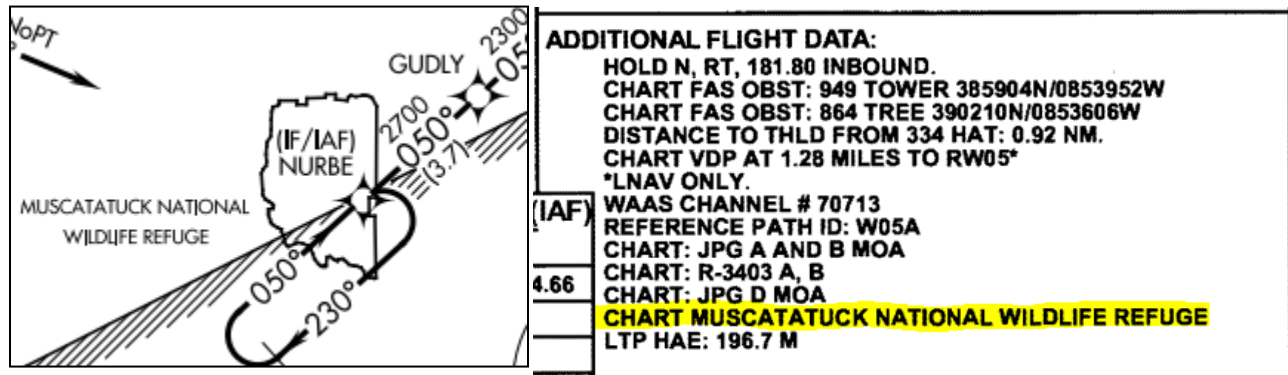
FAA Control #22-01-369

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

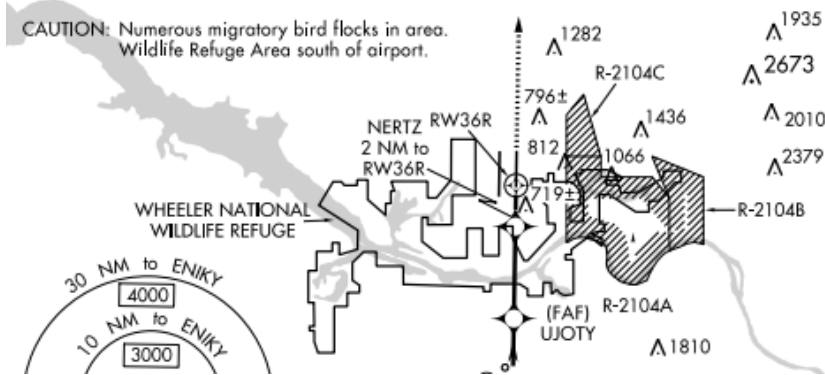
Background/Discussion:

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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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.

MEETING 22-02

Jeff Rawdon, FAA/AFS-420, reviewed the issue and said there was an ACM Recommendation Review Group (ARRG) discussion and the decision was made to accept this proposal for further assessment. It was discussed in the ARRG that adopting the recommendation to eliminate the graphic depiction of these areas might be feasible if there were an option to chart a note on the procedure instead.

Bill Tuccio, Garmin, said he does not think the notes are helpful either and doesn't support them on the charts. Doug Willey, ALPA, said almost every area includes a NOTAM that there is bird activity in the area. He asked what the criteria is to add these areas to the chart. Steve Madigan, Garmin, said migratory waterfowl NOTAMs are everywhere and he doesn't see the benefit of putting notes or graphic areas on the charts.

Jeff said these types of bird/wildlife warnings are published in the Chart Supplement in airport entries. He said the procedures are designed to protect these areas if that is necessary. He asked the audience if anyone thought these areas/notes were necessary and no one did.

John Moore, Jeppesen/Boeing, said someone probably thought this would help pilots' situational awareness. Pat agreed and said this is a situation where pilots may want to know if they are above a wildlife area. It is possible that the procedure could have been designed lower if not for a wildlife area. He said the Instrument Flight Procedures Team will continue to add these areas/notes to the procedures if requested by the local facility. Bennie Hutto, NATCA, said it may have been an environmental request to add this area. Valerie said there is a vague reference in FAA Order 8260.19 about making environmental assessments and the requests for the charting of these areas may be associated.

Valerie asked, if Flight Standards supports the removal of these areas, how will they determine it is appropriate in specific cases and how will the removal be accomplished. Dan Wacker, FAA/AFS-420, said if requirements are not covered in the 8260.19, a waiver is needed to add these areas/notes. This may be a path to cleaning these areas off the charts. Valerie asked if during the periodic review process, perhaps these could be removed unless they are supported by a waiver. Jeff said the Flight Procedures and Airspace Group will need to take this back and continue to investigate this issue further.

STATUS: OPEN

ACTION: Jeff Rawdon, FAA/AFS-420, will report on the Flight Procedure and Airspace Group (FPAG) investigation into possible criteria changes regarding the charting of wildlife, seashore and other similar areas on Instrument Approach Procedures and what steps, if any, should be taken to remove currently charted instances.

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 these areas should be charted. He will report at the next meeting.

STATUS: OPEN

ACTION: Jeff Rawdon, FAA/AFS-420, will report on the Flight Procedure and Airspace Group (FPAG) investigation into possible criteria changes regarding the charting of wildlife, seashore and other similar areas on Instrument Approach Procedures and what steps, if any, should be taken to remove currently charted instances.