AERONAUTICAL CHARTING MEETING
Charting Group
Meeting 25-02 – October 7-9, 2025

RECOMMENDATION DOCUMENT
FAA Control #C_25-02-408

Subject: Regularize charting of IFR departures incorporating a visual segment

Background/Discussion: ACM Charting Group has previously entertained requests to relocate IFR "visual departures" from the Chart Supplement to the Terminal Procedures Publication. See ACM 21-01-359 Chart Supplement Visual Departures & Noise Abatement Procedures.

The discussion at that time focused on the difficulty for instrument pilots to locate procedures in the Chart Supplement but was sidetracked by "noise abatement" labeling, purportedly requiring visual departure procedures to be segregated in the Special Notices section. The procedures referenced in this recommendation accomplish instrument departure alone and have no nexus to noise abatement; consequently, this recommendation hereafter ignores any noise abatement discussion in ACM 21-01-359.

No consistent terminology has been employed to refer to these procedures across discussion, letters to airmen, Chart Supplement inclusion, nor on the titles of the charts themselves. Therefore, this recommendation adopts the term "IFR visual departure" for purposes of compactness and consistency.

IFR visual departures have been developed at locations where terrain or proximate IFR traffic do not permit the application of TERPS ODP design criteria. The author is aware of the following procedures:

- TEB DALTON 2 (see ACM 21-01-359)
- ASE COZY 1
- MYF SOLEDAD (unnumbered)
- SQL untitled "San Carlos Airport VFR to IFR Departure Procedure[s]"

Operational use of these procedures at the four airports is coordinated differently. DALTON, COZY, and SOLEDAD charts are annotated "PILOTS SHOULD SPECIFICALLY REQUEST THIS PROCEDURE" by name. The SQL procedure is assigned verbally by ATC as part of pre-departure clearance without pilot request and does not presume possession of a chart. Also, the termination of the visual segment and transition to IFR separation is not standardized across these procedures.

The author has reviewed the ACM 21-01 discussion on this topic. Despite the AFS-420 objection that these procedures cannot be charted, Jeppesen chooses to chart and place these procedures in its canonical departure chart sequence (ASE 10-3A COZY 1 Visual DEP; TEB 10-3 DALTON 2 Visual DEP).

At SQL, with the exception of a small number of commercial operators who possess a Letter of Authorization waiver, departing IFR flights must verbally accept and copy, and in most cases read back, this lengthy and complicated "VFR to IFR Procedure." Lacking a frequency and ATC staffing to support dedicated clearance delivery, this clearance has

had to be verbalized on ground and local frequencies tens of thousands of times over a period of 30 years. To help pilots comprehend this exclusively verbal clearance, SQLbased flight organizations have over the years composed their own bespoke departure procedure charts.[1]

Unsurprisingly, the reaction by itinerant pilots to the most complex clearance verbiage they've ever received is confusion. Combined with frequency congestion and a plethora of non-standard charts, these circumstances set the stage for frequent pilot deviations.

Regularizing departure procedures and publishing them in their expected location is, based on operational efficiency and safety, thus in the shared interest of flying organizations, controllers, and pilots.

Recommendations:

1. IFR departures incorporating an initial visual segment should be charted as a conventional class of departure procedure.
2. IFR visual departure procedures should appear in the TPP in the canonical departure chart sequence, following Jeppesen's example.
3. Pilot and controller responsibilities and clearance delivery should be standardized. It should not be the case that some procedures are "upon pilot request" only and others may only be initiated by ATC.
4. All procedures should be named using standard departure procedure titles (name, serial number). This permits their inclusion in a flight plan.
5. Visual departure procedures can be modeled after Charted RNAV Visual Flight Procedures (RNAV CVFP), which are visual procedures that include advisory RNAV or conventional waypoints for reference.[2]
6. Charts should display a lost communications procedure using a standard presentation, again following Jeppesen's example.

Benefits:

1) Would adoption of the recommendation prevent or reduce the likelihood of occurrence of accidents or incidents?

   At SQL, itinerant pilots report great difficulty copying and comprehending the VFR to IFR departure. This author has on numerous occasions heard pilots struggling to copy the VFR downwind portion of the clearance, requiring multiple ATC iterations and readbacks. ATC has adopted the practice of breaking the clearance into chunks, at the cost of even greater frequency congestion, and having the pilot copy and read back each chunk separately; in the author's experience, this chunking frequently fails to detect readback errors. After takeoff, SQL ATCT typically monitors the departure flight path, talking the pilot in realtime through execution of the procedure, including the downwind turn and timing of the climb from VFR conditions.

[1] See Appendix A. FAA published the procedure for the first time, calling it a "noise abatement" procedure, in Chart Supplement SW Special Notices section, 31 October 2024.
[2] The SQL procedure recently incorporated an advisory RNAV waypoint that is not an element of the verbal clearance.

At TEB, multiple ASRS narratives[3] have been filed by flight crews who describe botching some detail of the DALTON procedure.

2) Would adoption of the recommendation mitigate a known or potential safety hazard?

   ATC-identified pilot deviations associated with execution of these procedures provide the most pertinent information about safety hazards. Some, but not all, of these deviations are captured in the ASRS narratives.

3) Would adoption of the recommendation resolve a known or potential issue creating operator or Air Traffic Control system errors?

   Both TEB and SQL crew have been cited for numerous pilot deviations related to their respective visual departures. Confusion about verbal clearances, turn limits and speed limits, and charting were the main factors at both locations.

   At TEB, in 2011, after multiple pilot deviations, FAA produced a training slide deck identifying procedure elements to which flight crews had failed to adhere. The procedure was made "on pilot request only" although clearance delivery continued to ask pilots unbidden if they possessed the A/FD-only chart.

   At SQL, citing multiple pilot deviations, the FAA took three remedial steps in October 2024:

   1. Notified the SQL pilot community of the new Letter to Airmen concerning the IFR visual departure procedure. See NCT-LTA-79.
   2. Created a video in the "From the Flight Deck" series detailing the IFR visual departure procedure and detailing altitude, heading, and climb deviations that had been observed in execution of the procedure.[4] (As of this writing, this video has not been published on the FAA "From the Flight Deck" page, and SQL is not listed on this page.[5])
   3. Published, for the first time, a graphical depiction of the procedure, naming it a "noise abatement" procedure,[6] in the Special Notices section of the Chart Supplement SW (effective 31 October 2024). This recommendation argues that the SQL procedure is not, in fact, a noise abatement procedure but rather an IFR separation procedure.

4) Would adoption of the recommendation increase operational or system efficiencies?

   1. Adopting conventional charting avoids designation of "on pilot request"-only procedures since the pilot can be presumed to be in possession of the chart.
   2. Permitting the FAA to chart visual segment departures facilitates ATC including the procedure in a clearance by name, avoiding frequency congestion reading the underlying route and altitude elements in full.

---

[3] An ASRS search on Teterboro, DALTON, and "pilot deviation," yields 44 results.
[4] See https://www.youtube.com/watch?v=kXm8S7OqpK8.
[5] See https://www.faa.gov/flight_deck/ .
[6] NCT has agreed to remove the "noise abatement" designation in a forthcoming publication of the procedure.

5) Would any additional benefits be recognized by adoption of the recommendation?

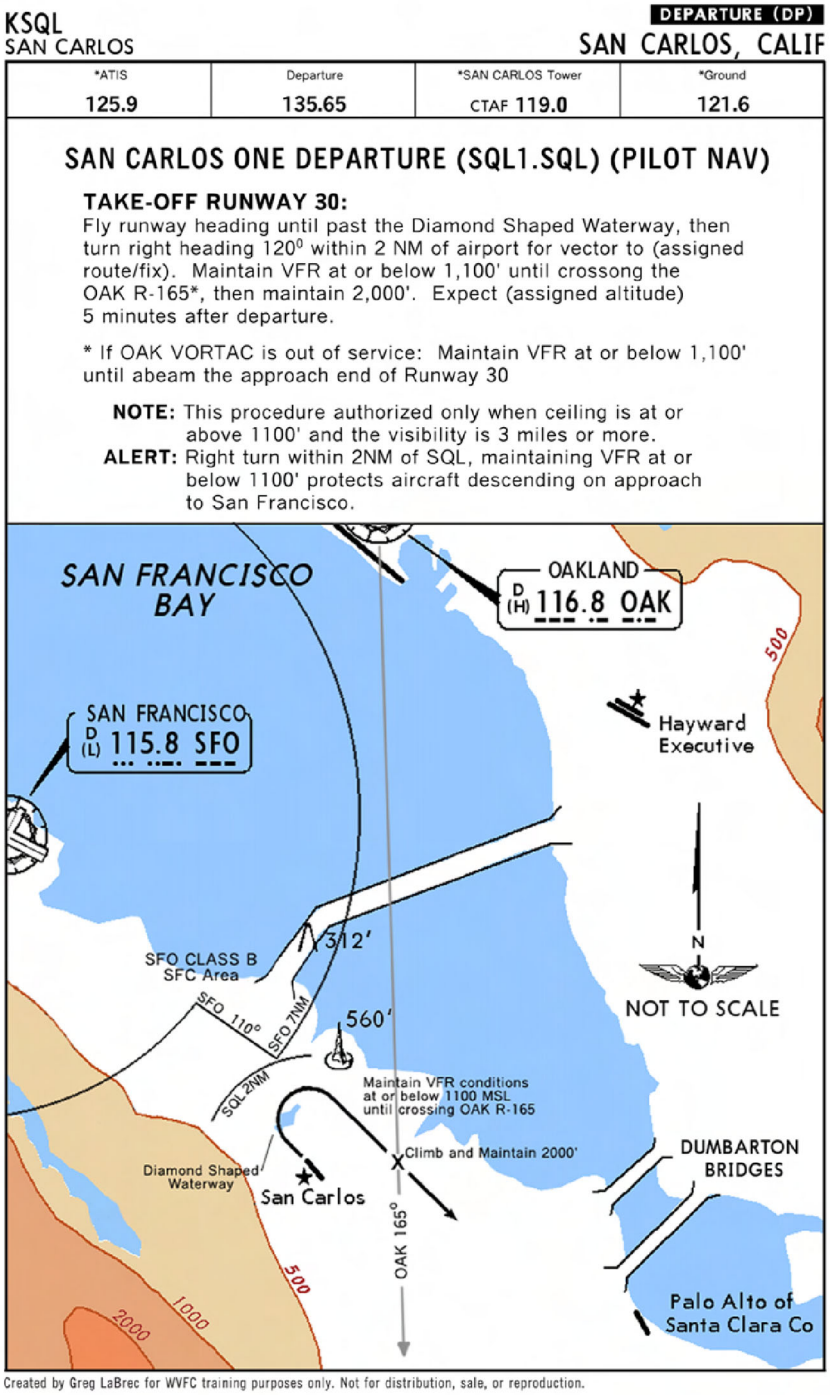
   This recommendation would also
   1. make the charting of IFR visual departures consistent with that of other departure procedures;
   2. reduce pilot workload by enabling pilots to locate published procedures in expected paper and electronic publication locations;
   3. resolve the ongoing conflict between the creation of additional IFR departures incorporating a visual segment and the stated prohibition, under TERPS guidelines, of publishing those same IFR departures;
   4. improve safety for pilots unfamiliar with what are now bespoke local procedures.

Comments:

This recommendation acknowledges that IFR visual departures are not considered ODPs for their respective runways, but takes no position as to whether such procedures should be charted as SIDs or instead some new category of departure (by way of example: VCOA procedures).

APPENDIX A.

Sample bespoke “SQL1.SQL” chart created (circa 1997) to graphically represent the SQL “VFR to IFR Departure Procedure” verbal-only clearance, as it then existed.



Submitted by: Brian Eliot
Organization: SQL IFR visual departure study group
Phone: +1 650 390 5646
E-mail: eliotb@myflighttraining.org
Date: 24 August 2025

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