

Operational & Safety Deficiencies at San Diego Intl-Lindbergh (KSAN)
Partial Compliance with Runway Design Standards

13 September, 2010

KSAN was not required to have Safety Areas because it had been grandfathered to the 1987 Federal Aviation Regulation (FAR) part 139.309. However, the U.S. Senate in the Runway Safety Improvement Act of 2008 forced KSAN to modify runway safety areas "to comply with the Federal Aviation Administration design standards required under part 139 of title 14, Code of Federal Regulations, by 31 December 2015". First, to comply with a Safety Area for runway 27, 315' X 218' of crushable concrete (EMAS) was installed at the West end of 27. Runway 9 does not have EMAS at the East end because it was determined that the shorter length would cause runway 27 takeoff and climb limits to be unacceptability restricted. As a substitute for complying with the Safety Area for runway 9, on 9 July 2010, the FAA removed 1121 feet of usable runway length which is now "unavailable for landing and takeoff distance computations"(10-9A airport info take-off page).

This measure still did not make runway 9 or runway 27 comply with the standards of a Runway Protection Zone (RPZ), the function of which is to enhance the protection of people and property on the ground (Section 212). If drawn to FAA design specifications, the East RPZ contains a Shell gas station and the West RPZ contains the Navy Lagoon and Liberty Station. These facilities and objects are prohibited in a RPZ (Section 212, a(2): (a) and (b)). However, KSAN is not required by the Federal Aviation Regulations to have RPZs. If not, it seems the Airport Layout Plan posted on the San Diego County Regional Airport Authority website has unnecessarily included them and the RPZ's are drawn incorrectly. It shows the RPZ's 200 feet from its landing thresholds (700' into runway 9 and 1800' into runway 27). KSAN diagram can be viewed at http://www.san.org/documents/amp/SAN_ALP_2009.pdf . FAA page entitled AC 150/5300-13 CHG 14 specifies that, "other than with a special application of declared distances, the RPZ begins 200 feet beyond the end of the area usable for takeoff or landing." For example the Montgomery Field Airport (KMYF) Layout Plan is drawn correctly. The RPZ begins 200 feet from the runway ends. This diagram can be viewed at <http://www.sdairfields.org/Portals/0/KMYF-AirportLayoutPlan-2004.pdf>

It is not enough that the airport only meets the safety standards of the Runway Safety Improvement Act of 2008 which only protects aircraft and the traveling public. Neglect of the existing FAA's requirements by choosing to place false RPZ's onto official KSAN diagrams misleads the observer that these standards are met. In the literal heart of San Diego, this airport will never be required to create minimum protection of people or property according to the FAA. Congress or citizens must demand compliance with existing runway design standards.

Eric Vermeeren of the Los Angeles Airports District Office is the Federal Aviation Administration person in charge of KSAN. 310-725-3631

Robert Ambler
619-804-9861
bambler@cox.net