Operational & Safety Deficiencies at San Diego Intl-Lindbergh (KSAN)
10/10/2010

1. (RPZ) Runway Protection Zone. The RPZ's are drawn incorrectly on the San Diego County Regional Airport Authority's website. It shows the RPZ's 200 feet from its landing thresholds (700 feet into runway 9 & 1800 feet into runway 27). FAA page entitled AC 150/5300-13 CHG 14 specifies that, "other that with a special application of declared distances, the RPZ begins 200 feet beyond the **end** of the area usable for takeoff or landing" not the landing thresholds as the Regional Airport Authority depicts it. For example, the Montgomery Field Airport (KMYF) Layout Plan is drawn correctly. The KMYF RPZ's begin 200 feet beyond the end of the runways.

2. (RSA) Runway Safety Area. Runway 9 does not have Engineered Materials Arrestor System (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 & takeoff distance computations".

3. Head to Head or Contra Flow. When the cloud ceiling goes below 700 feet &/or the visibility is less than 1 ¾ mile, airliners must land on runway 9. At the same time, many jetliners must depart on runway 27 due to a significant difference in runway limit weight between the two runways. This is a common occurrence during morning hours at certain times of the year. KSAN is the only major U.S. city that has daylight delays due to jetliners departing into the flight paths of landing airplanes.

4. Landing Minimums. KSAN has the highest landing minimums of any major city in the U.S. The airlines spend millions of dollars in certifying airplanes & pilots for category II & III approaches. KSAN does not even have a full category I approach. This translates into delays, diversions, cancellations, lost revenue, & hardship for passengers during low visibility conditions.

5. (WAAS GPS) Wide Area Augmentation System Global Positioning System. KSAN does not have a WAAS GPS approach. San Diego Montgomery (KMYF) & McClellan-Palomar (KCRQ) have WAAS GPS approaches. Why does KSAN not benefit from having a state of the art WAAS approach? What is preventing KSAN from having the installation of a WAAS approach?

6. (SMS) Safety Management System. FAA's SMS era is upon us. Risk exposure will be scrutinized. These operational & safety problems at KSAN should not be tolerated by the 8th largest city in the U.S.

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