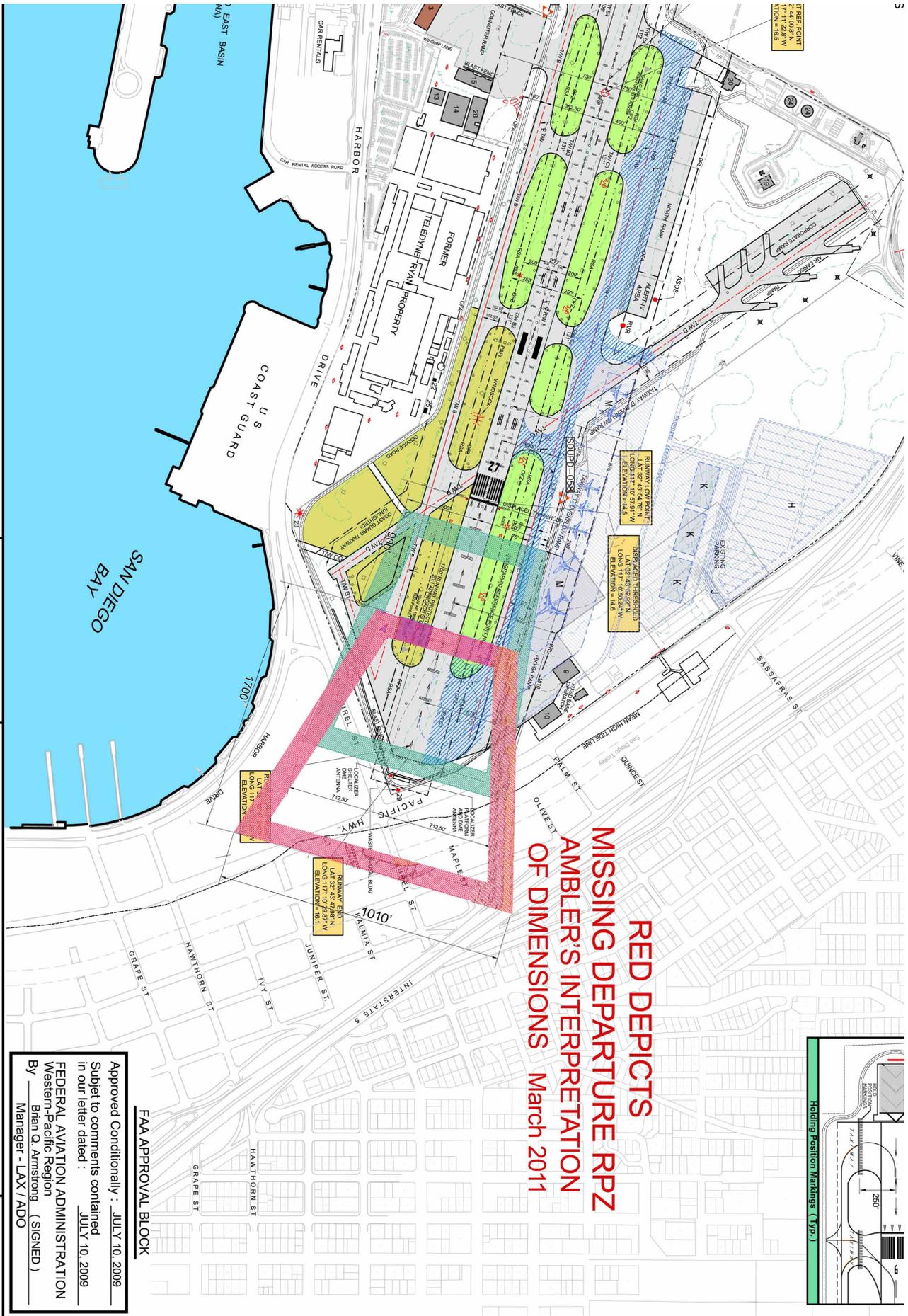


Operational & Safety Deficiencies at San Diego Intl-Lindbergh (KSAN)

22 October 2011

1. (RPZ) Runway Protection Zones are drawn on the San Diego County Regional Airport Authority's Airport Layout Plan (ALP) on its website. It shows KSANs approach RPZ's 200 feet from its landing thresholds (700 feet into runway 9 & 1800 feet into runway 27). KSAN's chosen RPZ compliance is described in FAA's Airport Design AC150/5300-13-CHG 15, Appendix 14, Paragraph 5. The KSAN APL correctly depicts approach RPZs but omits the runway 9 departure RPZ, ignoring part b of paragraph 5. FAA has broken its own regulation by approving this incomplete APL. I have depicted runway 9 departure RPZ in red on page 2.
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 ¼ 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 the delay 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.



**RED DEPICTS
MISSING DEPARTURE RPZ
AMBLER'S INTERPRETATION
OF DIMENSIONS** March 2011

FAA APPROVAL BLOCK

Approved Conditionally : JULY 10, 2009
 Subject to comments contained
 in our letter dated : JULY 10, 2009
 FEDERAL AVIATION ADMINISTRATION
 Western-Pacific Region
 By Brian Q. Armstrong (SIGNED)
 Manager - LAX / ADO

GO INTERNATIONAL AIRPORT
SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

APPROVAL RECOMMENDED :
 Henry Peters (SIGNED)
 MANAGER, TECHNICAL SERVICES
 APPROVED :
 Iraj Ghaemi (SIGNED)
 DIRECTOR, FACILITIES DEVELOPMENT DEPARTMENT

SAN DIEGO INTERNATIONAL AIRPORT
AIRPORT LAYOUT PLAN
 SAN DIEGO, CALIFORNIA

* DATUM *
 NORTH AMERICAN VERTICAL DATUM 1988
 DATE: June 26, 2009
 SHEET 1 OF 2
 DRAWING NO. 724
 REV.