

January 7, 2019

To: Kristin Camper, Community Plans and Liaison Officer, MCAS Miramar
Capt. Matthew Gregory, Director of Communication, MCAS Miramar

From: Citizens Advocating Safe Aviation
Stephanie Jed and Ron Belanger, Co-Presidents

Subj: DoD FLIP document and Operations at MCAS Miramar

You had asked CASA (Citizens Advocating Safe Aviation) to provide information about the DoD document we refer to from time to time. That is the **Flight Information Publication** or FLIP which is published twice per year and updated by NOTAMs - Notice to Airmen. It's the master flight planning document of the DoD.

That document is used as one of the main flight planning documents by US military pilots. It reflects international ICAO flight regulations, US FAA flight regulations as well as DoD and service regulations. It adds more stringent and detailed DoD requirements than the FAA and ICAO require. Finally, for many airfields, it provides additional guidance and restrictions.

We excerpted and have attached just the cover pages and the two MCAS Miramar / Joe Foss Field / Mitscher Field pages from the current FLIP AP/1 (Area Planning for North and South America). You can see the whole FLIP at Base Ops or any Ops Dept or you can download a copy per the instructions in the cover pages. But there's little in the rest of the document which is pertinent to our discussions.

The FAA airfield remarks for each DoD airfield are derived from this document. The published FAA remarks for KNKX are currently not as detailed as the FLIP document. That's not unusual. In fact, the FAA airfield remarks for MCAS Miramar start by pointing pilots to the FLIP AP/1 document.

https://aeronav.faa.gov/afd/03JAN2019/SW_165_03JAN2019.pdf

The MCAS Miramar section of the DoD FLIP adds or emphasizes particular requirements for aircraft operating in and out of MCAS Miramar. We've summarized those below in plain English assertions and have marked the paragraph of the FLIP AP/1 MCAS Miramar pages from which those statements are derived. We do this because the airfield remarks would require non-aviators to have a copy of the FAR and possibly the DICNAVAB at hand to parse the terse remarks in the FAA Remarks and FLIP remarks for any airfield... too many abbreviations and terms of art.

In our discussions with you, we often use illustrations from the AICUZ and ALUCP which you characterize as “just land use planning documents”. Indeed they are. They’re mandated by DoD and Federal Government regulations. The information contained in those documents is derived from many other governing documents including MOUs and Letters of Agreement between government agencies. We use the charts and graphs from those documents instead of the many and detailed regulations from which they’re derived because the charts and maps are authoritative and clearly illustrate what we’re saying.

So, to be clear, we do not assert that the land use documents are the controlling factors in airfield ops, but they conveniently and accurately reflect a myriad of rules, regulations and agreements which lack clearly designed charts, graphs and maps.

The following 8 assertions about Miramar Operations are based on FLIP and other regulations - but mostly on the FLIP document. The related paragraph in the FLIP section for MCAS Miramar is indicated in each assertion:

- A. All arrivals and departures are to be flown under FAA TRACON control using Instrument Flight Rules. There is an exception for helos at low altitude as long as they’re under tower control and use prescribed arrival and departure routes such as BEACH and FAIRWAY. *(derives from the fact that KNKX is in Class-B airspace. Helo exceptions are described in § 8)*
- B. All fixed wing aircraft departing Miramar must use MANDATORY published Standard Instrument Departures (SID) such as SEAWOLF or LAKEE. § 4
- C. Fixed wing aircraft departing Runway-24 **MUST NOT** fly west of the I-805 freeway until they have flown north to Carroll Canyon Rd. *(§ 4 - all aircraft must use a Standard Instrument Departure (SID) for departure routing. By definition, that precludes crossing the I-805 until Carroll Canyon Road which is where the 283° radial of the NKX TACAN intersects I-805. That 283° radial out to the SEAWOLF intersection west of Torrey Pines Golf Course is the route prescribed by all westward SIDs.)*
- D. Formation departures from Runway-24 may not delay their mandatory right turn immediately after takeoff. § 4
- E. Aircraft departing Runway-24 must secure afterburners prior to commencing REQUIRED immediate right turn to the north. § 4
- F. Helicopters may arrive and depart the Miramar Class-B airspace at low altitude under VFR (Visual Flight Rules) and Miramar Tower control but **MUST USE** pre-planned arrival and departure routes such as BEACH and FAIRWAY. § 8
- G. During Santa Ana conditions, when Miramar is landing west to east on Runway-06, aircraft **MUST USE** a downwind pattern. This means that they approach from the

east using the standard arrival routing over the designated crash zone between Poway and Miramar then fly west in a downwind pattern parallel to the runway. As aircraft reach the west end of the runway they commence a descending 180° / U-turn to land west to east on Runway-06. Aircraft must "avoid overflight of residential area located 2 NM N of the airport." § 6

H. **Straight in approaches to Runway-06 are NOT permitted.** § 6 (*The only instruction given for arrivals to Runway-6 is to approach from the east to west, as usual, then use a downwind pattern. There are multiple instrument approaches from the east to west, but **NONE** from west to east for Runway-06, not even a back-course ILS. Clearly, the intent of airspace architects was to avoid low altitude approaches over the schools, churches and dense residential development between the coast and the approach end of Runway-06. The worst possible time to ignore this reality is when an aircraft is in distress as was tragically illustrated by the Dec 2008 crash in University City.*)

Here are annotated excerpts from the current Flight Information Planning Publication (attached) remarks for MCAS Miramar / Foss Field / Mitscher Field

DoD FLIP AP/1 effective 3 SEP 2018 --- page 3-150
(highlighting and italic comments are CASA's)

1. GENERAL POLICY – Miramar MCAS (KNKX) is located in a densely populated area which is extremely noise sensitive. **Strict compliance with Noise Abatement and Air Traffic Control procedures is mandatory. Flight/course rules violations will be processed per OPNAV 3710.7 and applicable FAR.** All aircraft planning to operate in the greater San Diego area are encouraged to contact Miramar MCAS (KNKX) Air Traffic Control C858-577-4254/4257, DSN 267-4254/4257 for course rules briefing and advisories.

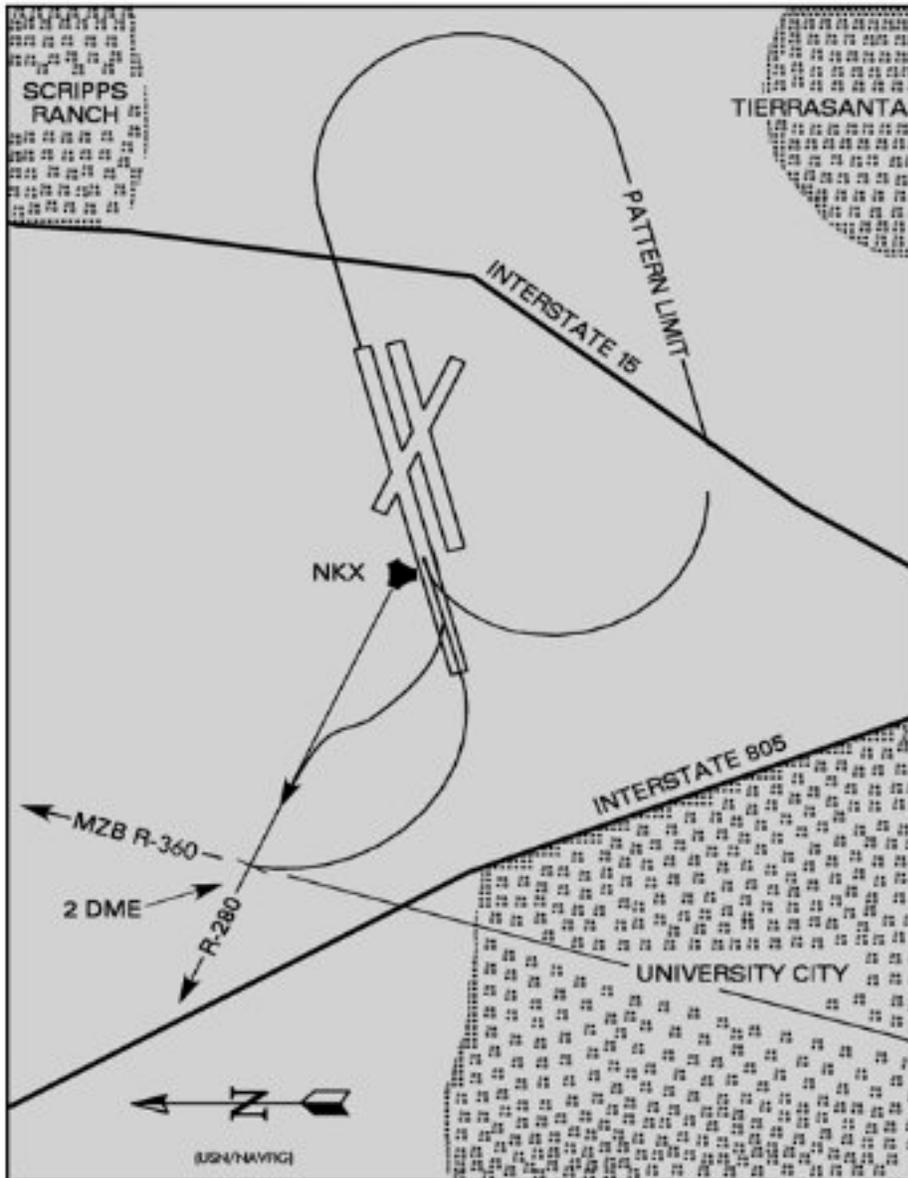
2. CAUTION – High mid-air collision potential. Extensive general aviation traffic all altitudes, all directions in vicinity of Miramar MCAS (KNKX). High volume of civilian VFR air traffic operating along the coastline W of Miramar MCAS (KNKX). Additionally, all aircraft arriving/departing VFR from Miramar MCAS (KNKX) via course rules to/from the coastline are advised to exercise extreme caution to avoid hang glider activity in the vicinity of Torrey Pines Golf Course (NKX R-280/5 DME).

3. **NOISE ABATEMENT PROCEDURES – Miramar MCAS (KNKX) employs stringent noise abatement procedures and strictly enforces all speed, altitude, and routing restrictions.** ...

4. **DEPARTURES RWY 24 – Commence a climbing right turn abeam the NKX TACAN, then via assigned Standard Instrument Departure. Turns shall not be**

commenced early, nor delayed to facilitate flight rendezvous. The NKX TACAN is located abeam Rwy 24R, 8500' from the approach end. Secure afterburners prior to commencing right turn. ...

5. ARRIVALS RWY 24 – Break altitude 2100' MSL. Remain within 2 NM S of field on VFR downwind leg. Avoid overflight of residential area located 3 NM SE of airport....



6. ARRIVALS RWY 06 - Downwind, avoid overflight of residential area located 2 NM N of the airport.

7.

8. VFR HELICOPTER ROUTE PROCEDURES –

a. All helicopter VFR and Special VFR (SVFR) routes shall be flown as published unless modified by ATC. If weather conditions preclude flight at published altitudes, helicopters shall fly under IFR procedures or by SVFR procedures, where permitted.

b. Helicopter VFR arrivals between 0800–1500Z++ (*4 PM to midnight*) shall fly inbound to Miramar MCAS (KNKX) above 4000' MSL until beginning descent for landing, or navigate to avoid direct overflight of communities along the coastline and Interstate 15....

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d. Helicopters shall transit along the coast by at least 1 NM laterally from the coastline. Inbound traffic to Miramar MCAS (KNKX) shall remain at least 1 NM off the coast prior to making the **turn onto either the Beach or Fairways Route toward Miramar MCAS (KNKX). Outbound departures shall proceed out to at least 1 NM offshore perpendicular to the coastline prior to turning N or S.**

9. SPECIAL OPERATING PROCEDURES – VFR minima – Jet and prop 1000/3. All military aircraft shall utilize instrument approach or radar vector into arrival traffic pattern and Standard Instrument Departure or radar vectors for departure.

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Signing for CASA:

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