



U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Office of the Regional Administrator

777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

April 18, 2023

Sjohnna Knack
Interim Director, Planning and Environmental Affairs
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, California 92101

Dear Ms. Knack:

Thank you for your email requesting the Federal Aviation Administration (FAA) provide a formal response regarding the proposed amendments to the PADRZ departure procedure for nighttime use at the San Diego International Airport (KSAN).

The request was to utilize the proposed nighttime PADRZ procedure between 22:00–23:30 local time. Due to the time between Air Traffic Control (ATC) clearance issuance and flight departure, there is a strong likelihood that some flights issued with the proposed procedure may not depart during the 22:00–23:30 window. The reverse scenario is also likely—flights issued with the current procedure may be delayed and end up in the 22:00–23:30 window. Both scenarios would cause the issued departure procedure to be canceled and changed to a different procedure. The controllers would then have to amend the flight plan through a national ATC computer system and reissue the departure routing. The pilots would subsequently have to reprogram their flight computer system and re-brief. These changes would be time-critical if they occur near the implementation or cutoff time; they also have the potential to cause safety issues and delays. All of this would occur during a busy time at KSAN, further compounding any resulting delays.

Additionally, when the FAA designs departure procedures, they are designed with the benefit of being automated with Controller Pilot Data Link Communications (CPDLC), thereby making the National Airspace System (NAS) much safer and more predictable. The proposed amendments to the PADRZ departure procedure would not allow this function.

A full work group meeting was held on October 26, 2022, to discuss those proposed amendments to the PADRZ departure procedure for nighttime use—among other topics. Based on the above information, the proposal was deemed not operationally feasible. It would significantly increase controller and pilot workload and complexity, while potentially introducing safety issues into the NAS. As such, the proposal will not move forward for implementation. The FAA remains open to discussing future proposed changes; however, we cannot support the proposed procedure amendments at this time.

The FAA's mission is to provide the safest, most efficient aerospace system in the world. We will continually strive to improve the safety and efficiency of flight in this country. If we can be of further assistance, please contact my office at (424) 405-7000.

Sincerely,

A handwritten signature in black ink, appearing to read "Raquel Girvin". The signature is fluid and cursive, with a prominent initial "R" and a long, sweeping underline.

Raquel Girvin
Regional Administrator