Comments Requested on a Notice of Proposed Rule Making for the Modification of Class D Airspace & Establishment of Class E Airspace at San Bernardino International Airport (SBD)

Comment Period Extended to December 10, 2024

Link: ***Federal Register : Modification of Class D Airspace, Establishment of Class E Airspace; San Bernardino International Airport, San Bernardino, CA***

Comments can be provided electronically via the link in the federal register, or by US mail, or FAX. See instructions in the federal register for this NPRM. When you comment, please point out the issues with the proposal. It is okay to express disapproval and the reasons why. However, the FAA responds more favorably if instead of just saying "no", commenters provide alternative or compromise suggestions where possible.

Background- Summary of Airspace Change Proposal - FAA's July 2, 2024 , Memorandum, Subject: Revised Airspace Review – SBD

Class D airspace findings:

• The current vertical limit of the Class D airspace is 3,200 feet. The vertical limit should be increased to 3,700 feet to better accommodate turboprop and turbojet aircraft in a high-density area. IFR arrivals to Ontario International Airport, CA (KONT), currently transition above the proposed ceiling of 3,700 feet. A lower transition for KONT arrivals could be accommodated via a letter of agreement.

• The current eastern lateral boundary of the Class D airspace does not fully contain IFR departure operations between the surface and the base of adjacent controlled airspace. A Class D shelf should be added to the northeast portion of the airspace from 2,600 to 3,700 feet, inclusive, extending 5.5 miles to the east. This proposed shelf would provide sufficient lateral distance to allow aircraft departing on either the JADKO ONE DEPARTURE (Area Navigation [RNAV]) Runway (RWY) 6 or the RWY 6 obstacle departure procedure (ODP) to reach the base of adjacent airspace within the lateral boundaries of the Class D airspace. The shelf would also allow for continued operations at Redlands Municipal Airport (KREI) at their current pattern altitude of 1,000 feet above the surface—while still allowing for northbound VFR transitions underneath the shelf and glider operations east of the airport in the foothills of the San Bernardino National Forest.

• The current western boundary of the Class D airspace does not fully contain the IFR departure operations of the RWY 24 ODP while between the surface and the base of adjacent controlled airspace, nor would it fully contain RNAV (Required Navigation Performance [RNP]) X RWY 6 IFR

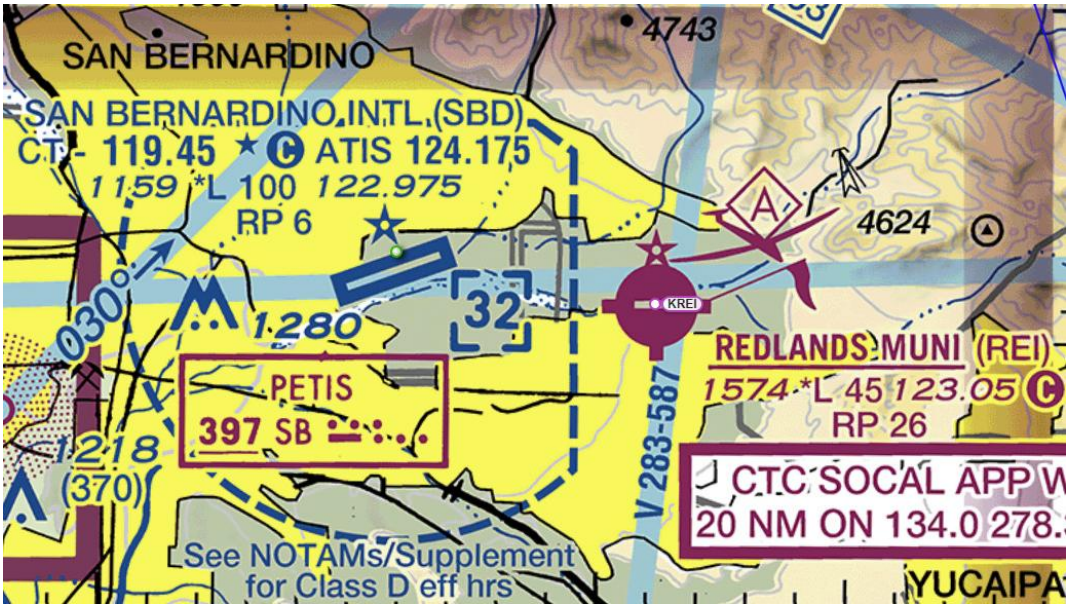
arrival operations while between the surface and 1,000 feet above the surface. A 4.2-mile-wide extension centered on the airport's 250° bearing extending a half mile west of its 4.5-mile radius should be added to the existing boundary to sufficiently contain these operations.

• The current northern lateral boundary of the Class D airspace would not fully contain IFR departure operations while between the surface and the base of adjacent controlled airspace when utilizing the JADKO ONE DEPARTURE (RNAV) procedure. The northern border of the Class D airspace should be extended .29 miles north of its current position to sufficiently contain departures on that procedure. The modification would also more appropriately align the northern border of the proposed Class D surface area with the northern border of the proposed Class D shelf.

Class E airspace findings:
• The current eastern lateral boundary of the Class D airspace would not fully contain IFR arrival operations for the RNAV (RNP) RWY 24 approach while between the surface and 1,000 feet above the surface. An eastward-then-southward extension to the surface area should be established to contain those operations. Because the needed extension is greater than two miles, the extension should be Class E4 airspace. The roughly 7x5-mile area would extend from the surface and would impose a 500-foot clearance-from-clouds requirement on VFR aircraft operating within the airspace area to support flight safety at KSBD without imposing 2-way radio communication. • Class E airspace beginning at both 700 feet (Riverside Class E5) and 1,200 feet (Los Angeles Class E6) above the surface exists in the area and provides all other required transitional containment.

Background -Existing and Proposed SBD and REI Airspace

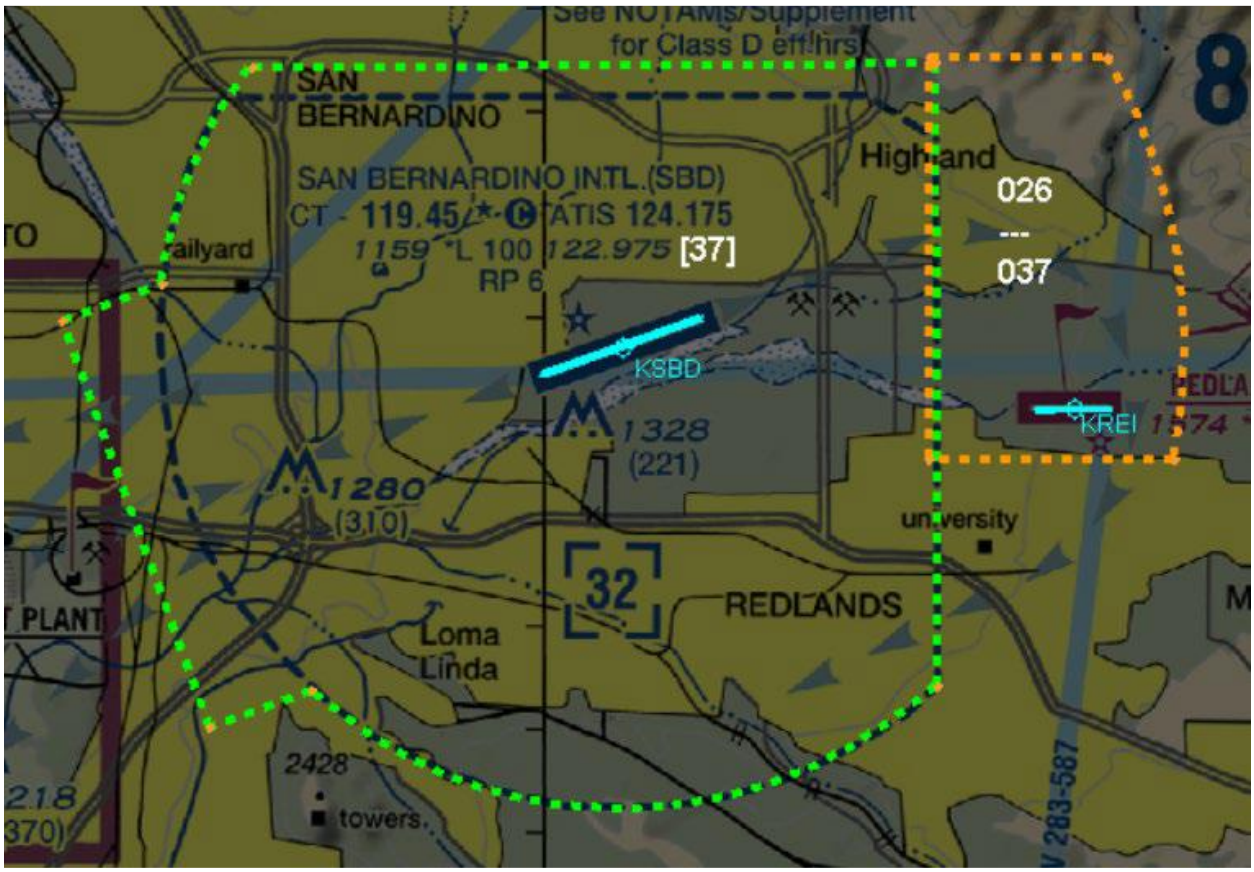
Existing Airspace @ SBD & REI



SBD Class D During Tower Operating Hours

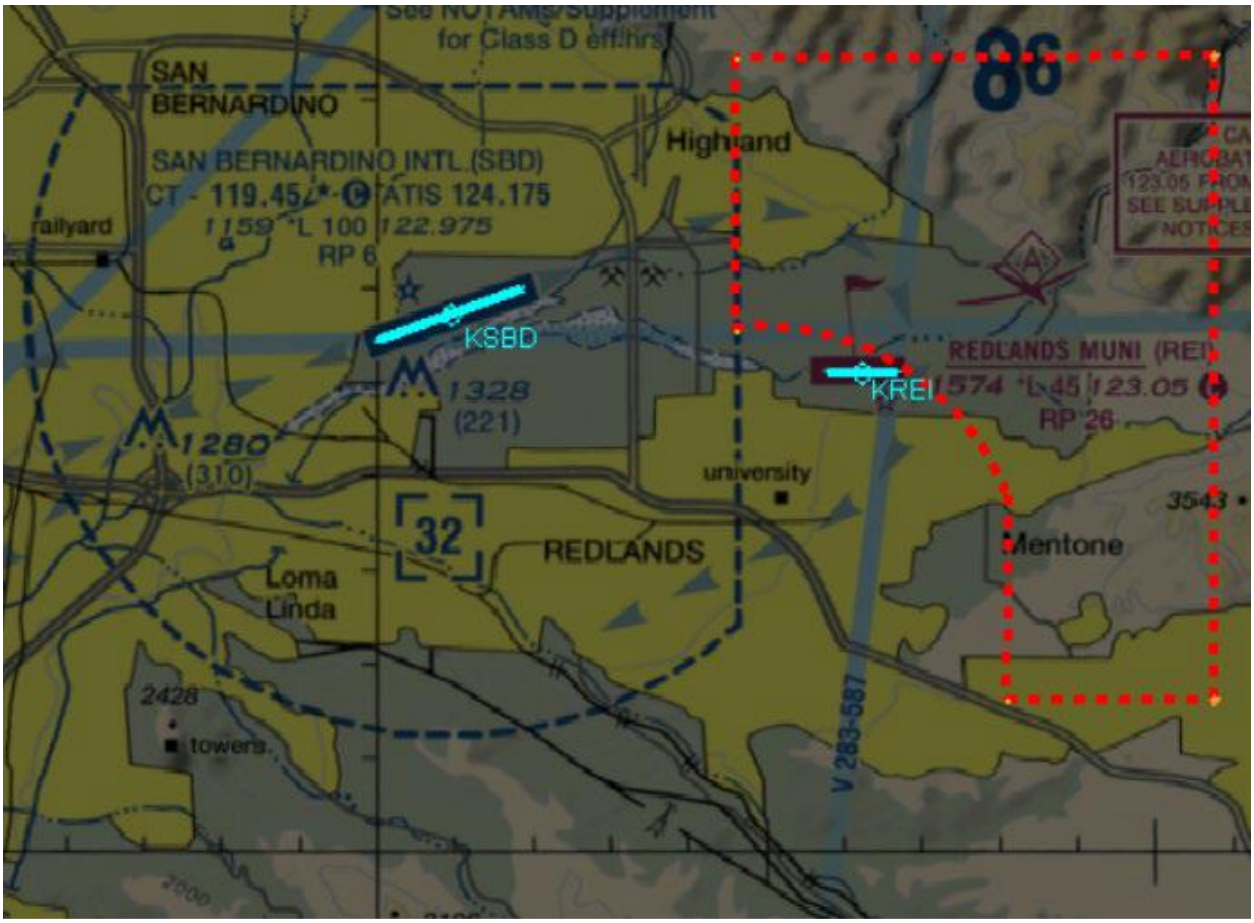
REI Class G to 699' AGL, Class E starting at 700'

Proposed SBD Class D Expansion and Class D Shelf



The proposed expanded Class D surface area is depicted in green, and the proposed Class D shelf is depicted in orange. The class D shelf overlays the fixed wing and helicopter traffic patterns at REI.

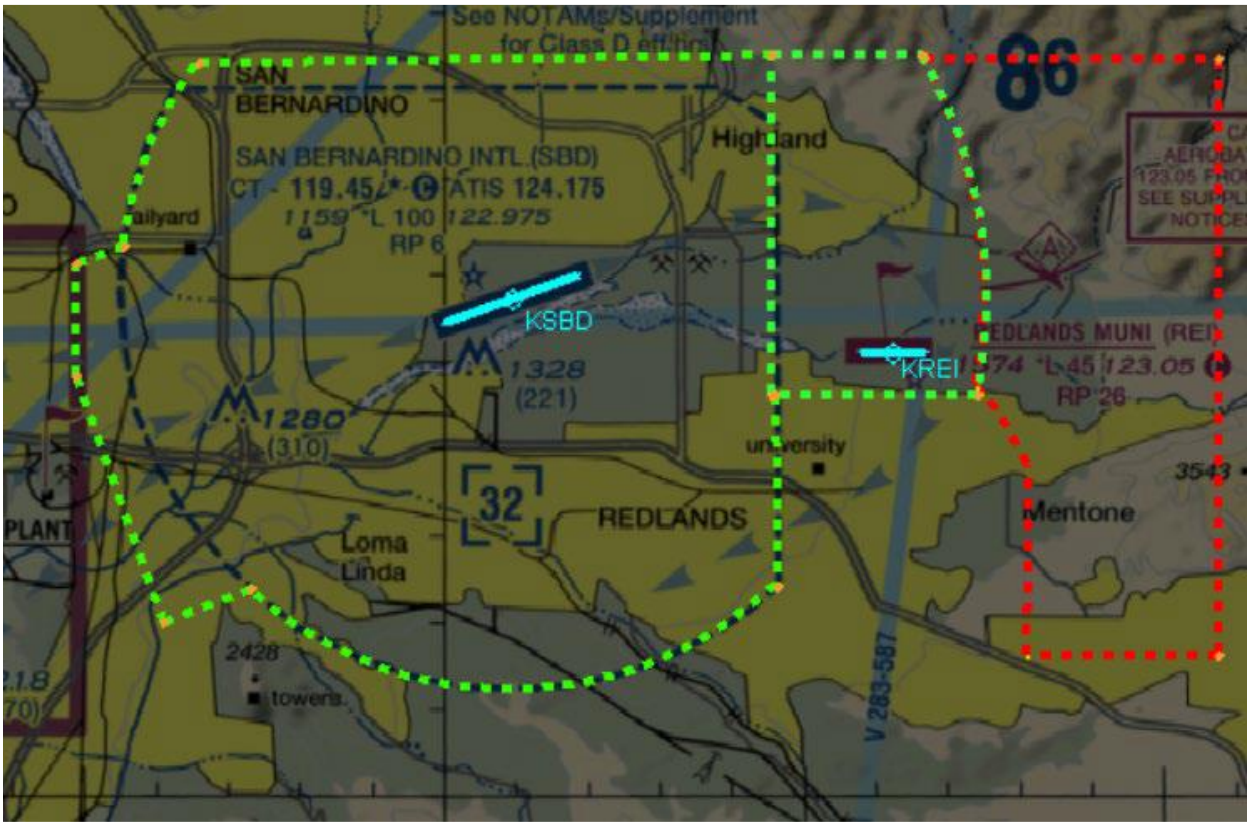
Proposed SBD Class E4 Extension to the Class D



The proposed Class E4 airspace area designated as an extension to the Class D surface area is depicted in red. It will replace the existing Class G airspace, where depicted and begin at the surface and go to overlying Class E5 airspace at 700'. Class G airspace surface to 700' exists outside of the depicted Class E4 airspace.

The new E4 surface airspace would impose a 3-mile visibility and 500 below 1,000 above and 2,000 horizontal foot clearance-from-clouds requirement on VFR aircraft as compared to 1 mile (day) and clear of clouds requirement for Class G airspace.

Proposed Charting of Expanded Class D and E Airspace



This drawing was included in the FAA's July 2, 2024 , Memorandum, Subject: *Revised Airspace Review – San Bernardino International Airport*. It illustrates how the proposed Class D expansion (depicted in green) and the Class E airspace area designated as an extension to the Class D surface area (depicted in red) would appear on a VFR terminal area chart.

Redlands Airport Association Assessment of the Airspace Change

-Currently SBD does not have any surveillance equipment (Radar/ADS-B)to detect traffic within their existing class D airspace. Traffic is detected visually. SBD tower personnel have shared they are already challenged to see traffic within their existing airspace. SBD is supposed to get surveillance equipment within two years as stipulated in the FAA's Reauthorization Act of 2024. The airspace modification proposal does not require the installation of surveillance equipment in the SBD tower as a prerequisite for this airspace change.

-The published TPA at REI is 2503'. That provides less than 100' separation from the floor of the newly proposed Class D shelf. This may lead to airspace incursions or REI traffic flying at a lower pattern altitude.

-The new E4 surface airspace designated as an extension of the Class D will be off limits to ultralight aircraft and paragliders. (See 14 CFR 103.17). There are at least a ½ dozen ultralight aircraft based at REI. Although they can take off and turn southbound to remain in Class G airspace it would be difficult for them to fly a left-hand traffic pattern to land on runway 26 with the E4 Airspace abutting the northeast corner of REI's runway. It's not clear how and if REI could obtain a waiver to allow the continued operation of 103 aircraft based at REI.

- The new E4 surface airspace would impose a 3-mile visibility and 500 below 1,000 above and 2,000 horizontal foot clearance-from-clouds requirement on VFR aircraft as compared to 1 mile (day) and clear of clouds requirement for Class G airspace. The loss of the class G airspace to the north and east of REI's runway does create some operating restrictions for REI operators that may have had need to use the Class G (day) VFR visibility and cloud clearance requirements. REI does not have an FAA approved weather source, so will operators at REI need to use reported SBD weather to determine VFR visibility in the Class E4 airspace? Visibility between both airports can vary due to elevation differences. During marine layer conditions REI will become VFR prior to SBD. This condition may lead to pilots operating at REI prior to SBD reporting VFR.

- The proposed charting of the expanded Class D and E airspace does not depict the location of the E4 airspace under the new Class D shelf. Standard charting symbology depicts Class E surface area with a magenta dashed line. The magenta line should replace the dashed red line in this drawing and extend under the class D shelf. To the eastern boundary of the new Class D surface area.

- There has been discussion between the REI waiver holder and the FAA to raise the floor and ceiling of the aerobatic practice area 300' to keep aerobatic aircraft out of the Class D shelf. This modification was acceptable to the APA waiver holder. No further changes to the APA are anticipated.

Questions? Email: Redlands.airport.association@gmail.com