



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



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CITY MANAGER'S OFFICE

Mission Support Services
800 Independence Avenue, SW.
Washington, DC 20591

MAY 20 2019

The Honorable Eric Filseth
Mayor of the City of Palo Alto
P.O. Box 10250
Palo Alto, CA 94303

Dear Mayor Filseth:

Administrator Daniel Elwell asked me to respond to your letter regarding a request to extend the comment period for the PIRAT TWO STAR procedure, which closed on March 29, 2019. The Federal Aviation Administration (FAA) appreciates your concern and continued advocacy on behalf of your constituents.

This particular comment period was the deadline for civil aviation organizations, affected military and civil air traffic control facilities, and airport owners and sponsors to submit technical aeronautical comments regarding the procedure, not as part of the FAA's environmental review process. The comment period for the environmental review was completed in the form of a Categorical Exclusion/Record of Decision (CATEX/ROD) on July 17, 2018. The CATEX/ROD was published to the FAA Community Involvement websites listed below for public review on February 22, 2019.

https://www.faa.gov/nextgen/nextgen_near_you/community_involvement/sfo
https://www.faa.gov/nextgen/nextgen_near_you/community_involvement/oak.

Furthermore, the publishing of the PIRAT TWO STAR procedure on April 25, 2019, was in response to the immediate deactivation of the recently published PIRAT ONE STAR on February 28, 2019, due to information unintentionally left off the procedure. The only difference between the PIRAT ONE and PIRAT TWO STAR is an altitude restriction at the PIRAT waypoint.

In your letter, you noted a concern about the proposed implementation of the PIRAT TWO STAR in the Northern California airspace. The FAA developed this arrival route in response to a unanimous recommendation from the 12-member Select Committee on South Bay Arrivals. The recommendation stated that, "The Select Committee recommends revision of the Woodside VOR ocean tailored arrival to honor the existing noise abatement procedure to cross the Woodside VOR at 8,000 feet." The FAA carried out this recommendation and raised the altitude of oceanic aircraft, within the vicinity of the Woodside VOR (OSI), now known as ARGGG waypoint, to 8,000 feet Mean Sea Level (MSL). Beyond this waypoint, aircraft will be radar vectored to join the approach course and will follow a ground track similar to the one used prior to the publication of the PIRAT STAR.

The FAA prepared a final environmental review to assess the potential environmental impacts of the PIRAT STAR procedure, per the National Environmental Policy Act (NEPA), and found that a CATEX was sufficient given the degree of change. Oceanic aircraft have been arriving over OSI and radar vectored for many years. The FAA does not anticipate this action will cause the number of oceanic aircraft over Palo Alto or its neighboring communities to change.

The FAA remains committed to working collaboratively with communities to address a wide range of issues. We will continue to work to ensure the safety and efficiency of the National Airspace System while maintaining transparency regarding airspace changes and being cognizant of potential impacts to communities.

In closing, this communication does not constitute either a final decision of the FAA or a reopening of the FAA's August 7, 2014, final decision for the Northern California (NorCal) Optimization of Airspace and Procedures in the Metroplex (OAPM).

We appreciate the opportunity to address your concerns. If we can be of further assistance, please contact Philip Newman, Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,



Angela R. McCullough
Vice President, Mission Support Services
Air Traffic Organization