



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

May 24, 2019

The Honorable Lynette Lee Eng  
Mayor of the City of Los Altos  
Los Altos City Hall  
1 North San Antonio Road  
Los Altos, California 94022

Dear Mayor Lee Eng:

This letter is in response to former Mountain View Mayor Leonard Siegel's and former Los Altos Mayor Jean Mordo's letter dated November 13, 2018, addressed to Ms. Kim Stover, former Director, Air Traffic Operations. In the letter, there are concerns raised about the PIRAT arrival route on behalf of the citizens of Mountain View and Los Altos. The Federal Aviation Administration (FAA) appreciates your concern and continued advocacy on behalf of your constituents through your participation in the Santa Clara Santa Cruz (SC|SC) Counties Airport Community Roundtable.

Ms. Stover is now in a new position and I am pleased to respond to you on behalf of the FAA.

The FAA developed the PIRAT 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 Very High Frequency Omnidirectional Range (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 the ARGGG waypoint, to 8,000 feet Mean Sea Level. Beyond this waypoint, aircraft are radar vectored to join the approach courses and will follow ground tracks similar to the ones used prior to the publication of the PIRAT.

As explained by FAA representatives at several San Francisco Roundtable meetings, oceanic aircraft have been arriving over OSI and have been radar vectored for many years. The FAA does not anticipate the number of oceanic aircraft over Palo Alto or its neighboring communities to change with the implementation of the PIRAT.

The FAA conducted an environmental review of PIRAT under the National Environmental Policy Act (NEPA), 42 U.S.C. section 4321 *et seq.*, and the agency signed the Categorical Exclusion/Record of Decision (CATEX/ROD) on July 17, 2018.

Subsequently, the FAA determined that it needed to make a minor amendment to the PIRAT. The only change it made was to add a 15,000-foot altitude restriction at the PIRAT waypoint, which is 23 miles offshore. The amendment did not change the route's ground track. The

comment period for the amended PIRAT route closed on March 29, 2019. 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 about the procedure. The comment period was not part of the FAA's environmental review process. The FAA published the amended PIRAT route – known as PIRAT TWO - on April 25, 2019.

Shortly after we implemented the PIRAT TWO, we discovered an operational issue with the procedure. To address this issue, the FAA temporarily lowered the PIRAT waypoint crossing altitude to 10,000 feet. We do not expect to see any reduction in the percentage of aircraft that cross ARGGG at or above 8,000 feet MSL. We will conduct a detailed analysis to determine whether we need to further amend the route to address the operational issue.

The FAA remains committed to working collaboratively with you and members of Congress on the SC|SC roundtable to address a wide range of issues. The FAA will continue to work to ensure the safety and efficiency of the National Airspace System while maintaining transparency regarding potential future airspace changes and being cognizant of potential future 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), or the FAA's July 17, 2018, final decision for the PIRAT procedure.

A similar letter is being sent to Mayor Lisa Matichak of the City of Mountain View.

We appreciate the opportunity to address your concerns.

Sincerely,



Raquel Girvin  
Regional Administrator  
Western Pacific Region

Cc: Mayor Lisa Matichak, City of Mountain View  
Congresswoman Anna Eshoo  
Congressman Jimmy Pannetta  
Congressman Ro Khanna  
Chairwoman, SC|SC Airport Community Roundtable, Mary-Lynn Bernald