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November 13, 2018

Kimberly Stover, Director, Air Traffic Operations
Western Service Area, AJTW
2200 S. 216th Street
Des Moines, WA 98198

RE: IFP Coordination, Standard Terminal Arrival Route (STAR), PIRAT, KSFO/KOAK

Ms. Stover,

The Cities of Mountain View and Los Altos (Cities) have serious concerns if the FAA allows the PIRAT STAR procedure to be published in its current state. Most importantly from the perspective of our cities, this new procedure has the potential to move noise over our cities, which violates the widely endorsed principle of not moving noise from one community to another. The PIRAT approach will likely increase the number of flights over Mountain View and Los Altos, as more, and perhaps all, Oceanic arrivals would be using this procedure rather than the select carriers using the existing Pacific 2 tailored arrival. Moreover, some proportion of that increased number of flights can be expected to be vectored over Mountain View and Los Altos when approaches are congested.

The aforementioned STAR data has been posted to the IFP Information Gateway and reviewed by our consultants. Please find the following issues relative to the STAR's development and production:

Design

The terminus of the PIRAT procedure is ARGGG at 8000' (MSL), where the aircraft depart on a track of 60 degrees "for vector to an instrument approach." We have the following comments:

- The cities of Mountain View and Los Altos are concerned about the potential of increased vectoring of transpacific flights over their communities during times of congestion and resulting from the higher utilization of the PIRAT procedure.
- The cities of Mountain View and Los Altos share an interest in noise being minimized over the populated areas past the ARGGG waypoint. To that end, we ask the FAA to work with Air Traffic Control (ATC) to have the minimum altitude of 8000' (MSL) followed.

CATEX

- The CATEX is devoid of any noise data analysis relative to projected traffic increases and expected usage. Analysis of old / new noise contours appears to have been bypassed, irrespective of aircraft altitude.
- The CATEX does not address historic noise complaints over the noise sensitive communities due to nighttime oceanic flights crossing as low as 1500' AGL. The San Francisco International Airport Noise Office has been tracking data on this issue since 2015. The Late Night Woodside VOR report shows the flight number and altitude for each aircraft that uses, or is vectored in the proximity of the Woodside VOR, on approach to San Francisco International Airport / Metropolitan Oakland Airport between the hours of 10:30 p.m. and 6:30 a.m. This report is generated twice per week and is sent to Northern California TRACON (NCT). To date, this has been no more than a futile effort to mitigate noise impacts with this compliance. With the PIRAT STAR now being "public," greater usage is expected which has the potential to bring greater impact; none of this has been quantified in the CATEX.
- The CATEX states, "The PIRAT STAR will convert the Pacific 2 Tailored Approach (TA) to a public-use RNAV STAR that expands benefits of the TA [tailored arrival] currently only available to selected carriers to all users of KSFO." We expect that noise will be shifted from other approaches as airlines consolidate operations to use this procedure, which violates the widely endorsed principle, including by the San Francisco Roundtable, of not moving noise from one community to another.
- From the CATEX: "An Environmental Review was completed by the Western Service Center and is incorporated herein by reference. The Environmental Review was conducted in accordance with policies and procedures in the Department of Transportation Order 5610.1C, 'Procedures for Considering Environmental Impacts' and FAA Order 1050.1F."

This Environmental Review was not included with the CATEX. In addition, this Review was not signed off by the FAA Regional Manager nor the Regional Environmental Specialist. Therefore, the Environmental Review does not comply with FAA JO 7100.41, 7400.2, 1050.1, and DOT Order 5610.1.

Air Traffic Initial Environmental Review

Section IV, Community Involvement, contains questions for Community Development input in conjunction with the airport proprietor. This section was not disclosed and appears to be noncompliant with the FAA's Community Involvement Manual / ATO Community Involvement Plan.

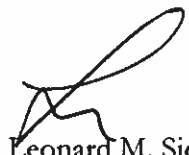
- Adverse effects on the following aspects of the environment were not disclosed:
 - Species listed or proposed to be listed on the List of Endangered or Threatened Species, or designated Critical Habitat for these species, contained within the San Francisco State Fish and Game Refuge, in which the terminus waypoint ARGGG is located.

- Impact to the San Francisco Bay Natural Wildlife Refuge was also not disclosed and is a possibility due to the vectoring of additional arriving aircraft for San Francisco, Oakland, and San Jose. The vectoring of low arriving aircraft over the South Bay (5000' and below) increased 36% from 2001 to 2013 and is projected to increase in the future.
- Properties protected under Section 106 of the National Historic Preservation Act were not disclosed. These sites involve a unique characteristic of the geographic area, such as prime or unique agricultural land, a coastal zone, a historic or cultural resource, parkland, wetland, wild and scenic river, designated wilderness or wilderness study area, sole source aquifer (potential sources of drinking water: San Andreas Lake, Crystal Springs Reservoir), or an ecologically critical area.
- Significant increases of noise over a noise sensitive area and emissions (hazardous/toxic substances) from low altitude vectored aircraft were not disclosed.

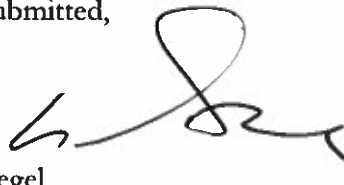
Therefore, the cities respectfully request the FAA to stop any further production action of the PIRAT STAR until the aforementioned errors can be rectified and the Environmental Review made compliant with current FAA Orders concerning Community Involvement. In addition, the cities request that this procedure be held in abeyance until noise impacts on the residents in our communities are provided by the FAA to our cities and until the cities are allowed to analyze the procedure and its impacts, and subsequently provide comments on this procedure.

Please consider the cities of Mountain View and Los Altos in the hosting of any future Community Involvement meetings concerning the finalizing of development of this STAR.

Respectfully submitted,



Leonard M. Siegel
Mayor
City of Mountain View



Jean Mordo
Mayor
City of Los Altos

cc: Honorable Anna Eshoo, U.S. House of Representatives
Honorable Jimmy Panetta, U.S. House of Representatives
Honorable Ro Khanna, U.S. House of Representatives
Dennis Roberts, Regional Administrator, AWP
Tamara Swann, Deputy, Regional Administrator, AWP
Manager, Federal Aviation Administration, Western Service Area Air Traffic Organization
FAA Manager, Aeronautical Information Services
Manager, Performance-Based Navigation Integration Group (AJV-14)
City of Mountain View City Council
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