# Appendix D – Section 4(f) and Associated Correspondence

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Section 4(f) Evaluation & Preliminary Finding

Responsible Federal Agency: Federal Aviation Administration (FAA)

Proposed Action: Improvements at Crystal Airport

Project Proposer: Metropolitan Airports Commission (MAC)

Section 4(f) Property: Edgewood Park

Section 4(f) Property Owner: City of Brooklyn Park, Minnesota

Report prepared by

Mead & Hunt

February 2019
1. Introduction
Section 4(f) of the U.S. Department of Transportation Act of 1966 protects significant publicly owned parks, recreation areas, wildlife refuges, and historic sites. A Section 4(f) use includes alteration of structures or facilities on the subject property, or constructive uses that do not physically affect the property, but indirectly impairs the resource in some way. The Section 4(f) regulation requires proposed transportation use be avoided, if avoidance is feasible and prudent, before U.S. DOT grants any funding or approvals for the transportation use. Additionally, a full evaluation of measures to minimize harm to that property must be made and documented.

This report evaluates a Section 4(f) property located in Brooklyn Park, Minnesota, that will be affected by a proposed action at Crystal Airport (Federal Aviation Administration (FAA) identifier MIC, or “the Airport”), located in the cities of Crystal, Brooklyn Park, and Brooklyn Center, Minnesota. For this evaluation, the Metropolitan Airports Commission (MAC) is the project proposer, the FAA is the responsible Federal agency, and the City of Brooklyn Park is the owner of, and official with jurisdiction over, the Section 4(f) resource. Coordination between these three entities was undertaken throughout development of this Section 4(f) evaluation, as described in Section 7 of this report.

Subjects covered within this Section 4(f) evaluation report include the following:
- Description of Proposed Action
- Description of Section 4(f) Property
- Description of Use and Impacts on Section 4(f) Property
- Avoidance Alternatives
- Minimization and Mitigation of Harm
- Coordination

2. Description of Proposed Action
Crystal Airport is one of seven airports owned and operated by the Metropolitan Airports Commission (MAC). The Airport is located in Hennepin County, approximately seven miles northwest of downtown Minneapolis. It lies primarily within the City of Crystal, with small portions of airport property extending into the City of Brooklyn Park and the City of Brooklyn Center. The Airport plays an important role in the MAC system of airports by attracting general aviation traffic away from Minneapolis-St. Paul International Airport (MSP) to relieve congestion, which helps reduce operating costs and promotes sustainability. Crystal is the closest MAC airport to downtown Minneapolis. The Airport currently has three paved runways, one turf runway, and two non-precision instrument approaches. Runway 14L/32R is 3,267’ x 75’; Runway 14R/32L is 3,266’ x 75’; and Runway 6L/24R is 2,500’ x 75’. Closed during the winter months, turf Runway 6R/24L is 2,123’ x 137’. A fixed-base operator (FBO) is located on site, as is an FAA-operated air traffic control tower, which operates daily in winter from 7 a.m. to 9 p.m. and in summer from 7 a.m. to 10 p.m. In 2017, there were 34,223 landings and takeoffs and 168 based aircraft at Crystal Airport.
Based on the recommendations of a recently completed Long Term Comprehensive Plan (LTCP) for the Airport, the MAC is proposing to make various improvements at the Airport. Based on the nature of the proposed project, the MAC is developing a joint federal Environmental Assessment (EA) / state Environmental Assessment Worksheet (EAW) for the proposed improvements. The federal EA is being developed under FAA policies and procedures detailed in FAA Order 1050.1F (and related documents) for compliance with the National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) regulations implementing NEPA. The state EAW is being developed in compliance with the Minnesota Environmental Policy Act (MEPA) and Minnesota Environmental Quality Board (EQB) rules implementing MEPA.

The purpose of the proposed action at Crystal Airport is to pursue the following three general infrastructure goals for the Airport:

1) Better align airfield infrastructure to match existing and forecasted activity levels;
2) Preserve and improve operational capabilities for design aircraft family; and
3) Enhance safety by simplifying the runway and taxiway layout.

The need of the proposed action is based on achieving the following six objectives that support the project purpose, as defined in the following subsections:

1) Simplify airfield geometry;
2) Provide the required runway length for critical design aircraft\(^1\) needs;
3) Enhance instrument approach capability and mitigate penetrations for both ends of the main primary runway;
4) Improve Airport ground vehicle circulation;
5) Increase aircraft apron parking capacity; and
6) Develop excess Airport property for non-aeronautical use.

The proposed action evaluated by the EA/EAW includes the following, as shown in **Figure 1**:

- Decommission Runway 14R/32L and convert it to a full parallel taxiway for primary Runway 14/32, extended to the new runway ends.
- Convert portions of primary Runway 14/32 blast pads to usable runway for a total published length of 3,750 feet with declared distances and change the runway designation to Utility.
- Shift primary Runway 14/32 approximately 115 feet to the northwest along its centerline.
- Reduce the length of existing Runway 06R/24L (turf) to 1,669 feet to clear Taxiways D & F from its runway safety areas (RSA).
- Revise the existing Runway 14 instrument approach procedure and establish a non-precision GPS-based instrument approach procedure (LNAV) to the Runway 32 end.
- Improve and simplify taxiway system, including:
  - Convert Taxiway E into an apron edge taxilane between Taxiways A and E1.

\(^1\) The critical design aircraft for runway length is defined by FAA Advisory Circular (AC) 150/5000-17, *Critical Aircraft and Regular Use Determination*, as “the single aircraft, or grouping of aircraft with similar operational requirements, that have the longest runway length requirement that makes regular use of the runway.”
1. Decommission Runway 14R/32L and convert it to a full parallel taxiway for primary Runway 14/32, extended to the new runway ends.
2. Convert portions of primary Runway 14/32 blast pads to usable runway for a total published length of 3,750 feet with declared distances and change the runway designation to Utility.
3. Shift primary Runway 14/32 approximately 115 feet to the northwest along its centerline.
4. Reduce the length of existing Runway 06R/24L (turf) to 1,669 feet to clear Taxiways D and F from its RSAs.
5. Revise the existing Runway 14 instrument approach procedure and establish a non-precision GPS-based instrument approach procedure (LNAV) to the Runway 32 end.
7. Remove the section of Taxiway E that crosses Runways 06L/24R and 06R/24L between Taxiways A and Taxiway B.
8. Remove Taxiways E2 and E3 between Taxiway E and the future parallel taxiway and replace them with a single new connector located between the removed taxiway sections.
9. Add a connector taxiway between Taxiway E and the future parallel taxiway offset from existing Taxiway B by approximately 100 feet to the northwest.
10. Remove existing runway end connector Taxiways E1 and E4 and replace with connectors from the future parallel taxiway to the new Runway 14/32 ends.
11. Add new engine-run up pads on either end of Runway 14/32 on its northeast side.
12. Construct on-Airport perimeter roads around runway ends on the north, west, and south sides of the airfield to allow ground vehicles to circulate without crossing runways.
13. Expand the FBO apron to increase available tie-down spaces for aircraft and remove tie-downs from the Runway 06R RPZ.
14. Develop parcels of Airport land for non-aeronautical use along 63rd Avenue North, in the area west of the Twin Creek wetland complex and on both sides of the 63rd Avenue North entrance road.

**Legend**
- **Proposed Threshold Siting**
- **Surface**
- **Potential Tree Removal Areas**
- **Airport Property**
- **Proposed New Pavement**
- **Proposed Pavement And Turf Runway Removal**

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**FIGURE 1**
Proposed Action
Crystal Airport
Section 4(f) Evaluation
- Remove the section of Taxiway E that crosses Runways 06L/24R and 06R/24L between Taxiway A and Taxiway B.
- Remove Taxiways E2 and E3 between Taxiway E and the future parallel taxiway and replace them with a single new connector located between the removed taxiway sections.
- Add a connector taxiway between Taxiway E and the future parallel taxiway offset from existing Taxiway B by approximately 100 feet to the northwest.
- Remove existing runway end connector Taxiways E1 and E4 and replace with connectors from the future parallel taxiway to the new Runway 14/32 ends.
- Add new engine-run up pads on either end of Runway 14/32 on its northeast side.
- Construct on-Airport perimeter roads around runway ends on the north, west, and south sides of the airfield to allow ground vehicles to circulate without crossing runways.
- Expand the FBO apron to increase available tie-down spaces for aircraft and remove tie-downs from the Runway 06R runway protection zone (RPZ).
- Develop parcels of Airport land for non-aeronautical use along 63rd Avenue North, in the area west of the Twin Creek wetland complex and on both sides of the 63rd Avenue North entrance road.

The proposed action will require removal of trees in Edgewood Park, which is owned and maintained by the City of Brooklyn Park. Several trees in Edgewood Park are expected to penetrate the proposed Runway 14 approach threshold siting surface (TSS) within five years of project implementation (for more information regarding specific trees see Section 4 of this report). The TSS is designed to protect the use of the runway in both visual and instrument meteorological conditions near the Airport. It has a trapezoidal shape that extends away from the runway along the centerline and at a specific slope. The existing and proposed Runway 14 TSS slopes upward one vertical foot for every 20 horizontal feet starting 200 feet from the Runway 14 landing threshold (the beginning of the runway available for landing). The clearance of the proposed TSS above the ground in the park varies from approximately 82 feet closest to 63rd Avenue North, to approximately 115 feet on the northwest side of the park. The existing TSS is approximately six feet higher than the proposed TSS because the origin of the TSS will shift to the northwest approximately 115 feet with the Runway 14 landing threshold under the proposed action.

### 3. Description of Section 4(f) Property

Edgewood Park is a neighborhood park in Brooklyn Park, Minnesota. The location of the park with respect to Crystal Airport and other parks in the area, is shown in Figure 2. The park property is owned and maintained by the City of Brooklyn Park, its total size is approximately 3.3 acres, and it includes a small playground and a wooded area. The park is not fenced and is open during daylight hours. The north, south, and west sides of the park are bordered by city streets; single-family residential properties border the remaining property boundaries. There is no dedicated vehicle parking for the park, but street parking is available along Florida Avenue to the west and Edgewood Avenue to the north. The playground is situated in the northwest corner of the park, and picnic areas line the northern edge of the wooded area to the south. A wetland complex associated with Twin Creek stretches diagonally across the southern portion of the park from southwest to northeast. There are no marked or clearly maintained walking trails in the wooded area of the park and field observation indicates that the wooded area is rarely used for recreational purposes.
Legend
- Edgewood Park Boundary
- Existing Threshold Siting
- Proposed Threshold Siting
- Crystal Lake Regional Trail
- Proposed Pavement And Turf
- Runway Removal
- Proposed Pavement
- Airport Property

Edgewood Park Location Map
Crystal Airport
Section 4(f) Evaluation

Southeast Park
Skyway Park
Fair Oaks Park
Lakeland Park
Southbrook Park
North Lions Park

Legend
- Edgewood Park Boundary
- Existing Threshold Siting
- Surface
- Proposed Threshold Siting
- Surface
- Crystal Lake Regional Trail
- Proposed Pavement And Turf
- Runway Removal
- Proposed Pavement
- Airport Property

FIGURE 2
Edgewood Park Location Map
Crystal Airport
Section 4(f) Evaluation

Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan,
METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, ©

Crystal Airport Layout Plan - Prepared by Ricondo, Inc.
Edgewood Park is among 13 of the City’s 60 parks that have been identified in the City's Park System Plan as priorities for natural resource management “based on the size and quality of the existing vegetation presently in the park.” The Park System Plan also notes that Edgewood Park is within one of the ten census block groups in the city defined as Areas with Majority People of Color and Lower Income (POCLI) and identifies the block group around Edgewood Park as underserved by the parks system.

A property must be a significant resource for Section 4(f) to apply. Resources that meet the 4(f) definition are considered significant unless the official with jurisdiction over the site (in this case, the City of Brooklyn Park) concludes that the entire site is not significant. The City of Brooklyn Park has the authority to determine whether Edgewood Park should be considered a Section 4(f) Resource for the purpose of the Crystal Airport EA/EAW. The FAA may review statements of insignificance.
A certified arborist from Mead & Hunt, Inc., assessed the species, health, and maturity of trees in the park during a field survey on October 3, 2018. The arborist assessed the maturity of the trees based on measurements of trunk diameter and a visual estimate of each tree’s height. Location data was mapped for approximately 300 trees representing the larger and more mature trees, while hundreds of smaller trees were observed in the southern portion of the park but were not individually mapped. Light detection and range (LiDAR) information was also collected via airborne remote sensing in September 2018 to provide accurate height information for the tree canopy and specific individual trees in the park.

The wooded area south of playground is not heavily maintained and is dominated by cottonwood (Populus deltoides) which constitutes approximately 70 percent of trees in this area. The two other most frequently observed species in the wooded area are boxelder (Acer negundo) and Siberian elm (Ulmus pumila), each of which constitute approximately 10 percent of trees in this area. The remaining 10 percent of trees in this area consist of various species, including silver maple (Acer saccharinum) and hackberry (Celtis occidentalis). Some cottonwood and boxelder trees are in an area listed on the National Wetlands Inventory (NWI) mapping tool as a forested/shrub wetland, located at the approximate center of the wooded area.

Trees surrounding the playground north of the wooded area mostly appear to have been planted purposefully and consist of various species including green ash (Fraxinus pennsylvanica), silver maple (Acer saccharinum), and blue spruce (Picea pungens). There is a also an isolated wooded area in the northeast corner of the park that consists primarily of boxelder and Siberian elm.

Approximate tree heights and locations are shown in Figure 3, which includes a profile view showing their relationship to the existing and proposed approach TSS for the future Runway 14.

4. Description of Use and Impacts on the Section 4(f) Property

The proposed action will require removal of approximately 32 trees in the southern portion of Edgewood Park, as these trees are expected to become penetrations to the approach TSS for the proposed relocated Runway 14 end. None of these trees currently penetrate the proposed Runway 14 approach TSS, but they all currently reach a height less than 10 feet below the TSS. All trees proposed for removal are cottonwoods, which is the only tree species that is expected to cause ongoing approach issues in the park given their taller than average mature height and their distance approximately 2,000 feet from the proposed Runway 14 end.

Cottonwood is a tall, fast growing species adapted to wet sites. The growth rate of cottonwood trees is much faster and more variable than any of the other species identified. They are rarely purposefully planted in street or residential settings. Their undesirable characteristics are not offset by attractive traits like showy fall color. They seed by wind and will sprout up on any wet site that is not mowed regularly. The seeds they produce are undesirable in residential settings as they regularly clog air conditioners and downspouts. Cottonwoods contribute only minimally to wildlife habitat. They provide some structure for songbirds but produce no edible fruit. They sprout vigorously after pruning, producing weak branches, so removal is the only option that should be considered for obstruction mitigation.
NOTED:
- TREES INDICATED AS "REMOVE" ARE ALL COTTONWOOD TREES WITH HEIGHTS MORE THAN 10 FEET BELOW THE PROPOSED RUNWAY 14 APPROACH TSS.
- TREES INDICATED AS "MONITOR" ARE ALL COTTONWOOD TREES WITH HEIGHTS MORE THAN 10 FEET BELOW THE PROPOSED RUNWAY 14 APPROACH TSS.
- TREES INDICATED AS "KEEP" ARE ALL NON-COTTONWOOD SPECIES WITH HEIGHTS MORE THAN 20 FEET BELOW THE PROPOSED RUNWAY 14 APPROACH TSS.
- HEIGHTS OF TREES GREATER THAN 940 MSL ARE BASED ON TREE CANOPY HEIGHTS IDENTIFIED USING LIDAR DATA COLLECTED IN SEPTEMBER 2018.
- HEIGHTS OF TREES LESS THAN 940 MSL REPRESENT TREES BELOW THE CANOPY AND WERE ESTIMATED BASED ON SPECIES TYPE.

LEGEND
Tree Recommendations:
- Keep
- Monitor
- Remove
AGL: Above Ground Level

EDGEOOD PARK PLAN VIEW

EXISTING TREE PLAN & PROFILE

CRYSTAL AIRPORT
CRYSTAL, MINNESOTA
EDGEOOD PARK
SECTION 4(F) EVALUATION

FIGURE 3
Nearly all cottonwood trees proposed for removal are in the southeast corner of the park. Most of these trees are between 80 and 90 feet tall, with a diameter between 15 and 30 inches. Larger cottonwoods proposed for removal are located further north and west and range from 85 feet tall to a maximum of 97 feet tall, with a diameter between 25 and 50 inches. The shorter cottonwoods proposed for removal are in upland areas with a ground surface elevation of approximately 869 to 870 feet above mean sea level (MSL). The taller cottonwoods are in lower areas between 865 and 868 feet MSL near the wetland area at the center of the wooded portion of the park.

The LiDAR height data indicate that the current maximum height of cottonwood trees in upland areas further from the wetland is about 90 feet, while trees in lower areas near the wetland grow more massive but only marginally taller, with no trees observed with heights greater than 100 feet. According to the *Textbook of Dendrology* by Harlow, Harrar, Hardin, and White, the average mature height for a cottonwood is 100 feet, although they do grow taller in some instances.

The City of Brooklyn Park has requested that several additional cottonwoods along the southern edge of the park be removed at the same time. These additional cottonwoods were not identified as potential penetrations to the approach TSS, but they are in poor health and/or represent a safety hazard to pedestrians.

Approximately 70 additional cottonwood trees were identified that currently reach a height between 10 and 20 feet below the TSS. These trees range in height from 83 to 95 feet tall. If in the future these trees were to grow to the average mature height of 100 feet noted above, none of them will penetrate the TSS given their current distance below the surface. Therefore, the potential future obstruction status of these trees is uncertain, and the MAC proposes to monitor the height of these trees following project implementation rather than remove them as part of the proposed action.

None of the purposefully planted trees surrounding the playground and picnic area in the northern portion of the park are expected to penetrate the proposed TSS, nor will any of the Boxelder or Siberian elm trees located in the isolated wooded area in the northeast corner of the park.

5. Avoidance Alternatives

The no-action alternative is not an acceptable alternative to the proposed action because it does not meet the purpose and need for the project, as it would not provide the required primary runway length for critical design aircraft needs. Under the no-action alternative, the Runway 14 approach TSS would remain in its existing location approximately 115 feet southeast of its proposed location. The existing Runway 14 approach TSS is depicted in profile with relation to the trees in Edgewood Park in Figure 3. As shown, the existing Runway 14 approach TSS is approximately six feet higher over the park than it is under the proposed action. There are approximately 12 trees reaching heights less than 10 feet below the existing Runway 14 approach TSS, compared to approximately 32 trees under the proposed action. There are also approximately 34 trees reaching heights between 10 and 20 feet below the existing Runway 14 approach TSS, compared to approximately 70 trees under the proposed action. Although there are fewer trees within 20 feet of the Runway 14 approach TSS under the no-action alternative, tree removal in the park and/or monitoring of trees for future obstruction status would still be needed.
The only alternatives that would completely avoid the need for tree removal in the park and/or monitoring of trees for future obstruction status are to 1) allow penetrations to the Runway 14 TSS, 2) reduce the length of the primary runway, 3) realign the primary runway, or 4) close the primary runway. The first option is not an acceptable alternative to the proposed action because it does not meet the purpose and need for the project, as it would not enhance instrument approach capability and mitigate penetrations for both ends of the main primary runway. The second and fourth options are also unacceptable because they do not meet the purpose and need for the project, as they would not provide the required primary runway length for critical design aircraft needs. The third option is not acceptable because the current primary runway is centrally located on Airport property and therefore minimizes impacts to both on-Airport and off-Airport land uses. Any rotation or lateral/longitudinal shift of the runway will necessarily result in greater impacts to land uses and environmental resources in the project area and general vicinity. Furthermore, this alternative would be much costlier than the proposed action, which makes efficient use of existing Airport infrastructure, and is likely cost-prohibitive.

Based on the above, there is no acceptable alternative that meets the purpose and need for the project, minimizes impacts to other land uses and environmental resources, and avoids the need for tree removal in Edgewood Park and/or monitoring of trees for future obstruction status.

6. Minimization and Mitigation of Harm

A Section 4(f) evaluation should address all possible measures to minimize harm. For parks, recreation areas, and wildlife and waterfowl refuges, measures to minimize harm may include: design modifications or design goals; replacement of land or facilities of comparable value and function; or monetary compensation to enhance the remaining property or to mitigate the adverse impacts of the project in other ways. All mitigation measures require appropriate documentation and coordination between the responsible federal agency (FAA), project sponsor (the MAC), and the official with jurisdiction (City of Brooklyn Park).

The removal of cottonwood trees and establishment of more desirable species to prevent regrowth of the cottonwoods, or establishing and maintaining turf grasses, are the only cost-effective solutions. Pruning the cottonwoods will be a constant expense with no benefits to the community. Removing the cottonwoods while they are shorter will be less costly than waiting until they become obstructions. They could be replaced with tree species which will be beneficial to the park environment and the community surrounding it. Hackberry (*Celtis occidentalis*) is an example of a species that is currently thriving on the site. This attractive tree will never grow to be an obstruction and the investment made in planting this or other desirable species will improve the public’s use of the park. The cottonwoods currently on the site do little to contribute to the park environment. The cottonwood trees make the site look “forested” and provide some shade but represent long-term maintenance and safety problems. The “cotton” seeds can cover the landscape in the spring, but the bigger concern is the high potential to drop large branches as the trees age. Rot at the base of the trunks is also common. The wood is not rot resistant and tall trees can do serious damage when they fall.
All tree removal contract language will include assurances that ANSI A300 standards be followed. Desirable trees which are currently located adjacent to the trees designated for removal will be identified prior to the start of the removal operations. Contract language will provide assurances which protect desirable trees to the extent reasonable and feasible, and to provide replacements if the desirable trees are damaged during removal operations. To avoid and minimize impacts to birds and other animals that may roost or nest in the trees during the summer months, tree removal will be completed between October and April. Tree removal during frozen ground conditions will also decrease rutting and compaction of the soil. Tree removal will be limited to that specified in project plans. Tree removal limits will be clearly indicated in the field by bright orange flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits. Tree clearing limitations will be discussed with contractors at the pre-construction meeting to ensure that they understand clearing limits and how they are marked in the field. All the wood, foliage, and other material including wood chips will be removed from the site. Where appropriate, stumps will be left in place to control erosion and herbicide will be applied to the stumps to prevent sprouting. Equipment will be cleaned and stored in established staging areas prior to, during, and following tree removal to minimize the spread of invasive plant seeds to off-site areas or other areas on-site. Removal of non-native plant species already established in tree removal areas, such as common buckthorn (Rhamnus cathartica), will also be considered.

Tree species selection for replacements will be part of a landscape and/or wildlife management plan developed in concert with the park’s owner. Species to be planted in the maintained park area will be selected for characteristics that contribute to the park environment. Hackberry (Celtis occidentalis), bitternut hickory (Carya cordiformis), red oak (Quercus rubra), and bur oak (Quercus macrocarpa) are examples of suitable replacement native species. Any tree or shrub species which are identified as contributing to wildlife habitat and do not have the growth potential to be obstructions will be acceptable in the unmaintained areas. Seeding native woodland herbaceous species in canopy openings after cottonwood removal will provide ground cover for erosion control and help prevent establishment of garlic mustard, burdock, and other invasive species. Virginia wildrye (Elymus virginicus), bottlebrush grass (Elymus hystrix), cut-leaf coneflower (Rudbeckia laciniata), and hispid buttercup (Ranunculus hispidus) are a few candidates for seeding.

Removal of the cottonwood trees will not substantially change the wooded character of the park or the available habitat types, nor will it change the wetland type or substantially alter its tree cover. Tree removal will be carefully targeted, clear-cutting stands of trees will not be required, all available measures will be taken to minimize impacts to other trees, and the MAC will replace the trees with other shorter and more suitable species for the park environment. For these reasons, the use of Edgewood Park as a neighborhood park and as a natural resource is not expected to be impaired by the proposed action.

According to the FAA’s 1050.1F Desk Reference, and the FHWA’s July 20, 2012 Section 4(f) policy paper, if the proposed project will not adversely affect the activities, features, or attributes qualifying a park for protection under Section 4(f), the FAA may make a de minimis determination about the use of a Section 4(f) property. To make a de minimis determination, the NEPA documentation needs to support the finding that there is no adverse effect to the activities, features, and attributes of the resource. This finding can consider mitigation measures.
7. Coordination
During development of this Section 4(f) evaluation, the project proposer (MAC) met on several occasions with the official(s) with jurisdiction over the Section 4(f) property (the City of Brooklyn Park). The MAC also met with responsible federal agency (FAA) staff responsible for this evaluation on several occasions. Coordination included discussion of avoidance alternatives, impacts to the property, and mitigation measures. Coordination with the City of Brooklyn Park also included a discussion of the property's significance and primary use of the property.

The FAA must provide an opportunity for public review and comment on this Section 4(f) evaluation report. This public review period will be held concurrently with the public comment period for the Draft EA/EAW, which is expected to commence in April 2019 and extend for a period of 45 days. If comments are not received within 15 days of the comment deadline, a lack of objection may be assumed and the process may proceed to a Final Evaluation. After the opportunity for public comment, the City must concur in writing that the project will not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection.

If any agencies raise issues during coordination, Section 4(f) requires follow-up coordination. While the regulation does not stipulate that these issues be resolved successfully, the regulation calls for reasonable efforts and good-faith attention by decision makers to resolve any issues arising during coordination. This evaluation and finding captures discussions and coordination that has taken place between the FAA, MAC representatives, and the City of Brooklyn Park.

After the comment period is complete, the FAA will make a final decision based on the information provided above, any public comments received, and in coordination with the City of Brooklyn Park as to whether the effects of the proposed project on Edgewood Park constitute a *de minimis* Section 4(f) impact.

8. Preliminary Finding
After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed federal action is consistent with Title 49 USC § 303 and other applicable environmental requirements. The proposed federal action will not significantly affect Edgewood Park and constitutes a *de minimis* Section 4(f) impact.

[Signature]
Josh Fitzpatrick
Environmental Protection Specialist
Federal Aviation Administration
Dakota-Minnesota Airport District Office

11 February 2019

Date
February 11, 2019

Ms. Cindy Sherman
Planning Director
Brooklyn Park Community Development Department, City Hall
5200 85th Avenue North
Brooklyn Park Minnesota 55443

Re: Section 4(f) de minimis Finding for a Safety Improvement and Airport Development Project at the Crystal Airport

Dear Ms. Sherman:

The Crystal Airport (MIC), in cooperation with the Federal Aviation Administration (FAA), is proposing to address airfield safety concerns and enhance Airport development opportunities. Because of the frequency of runway incursions at MIC, the FAA included the Airport in its national initiative known as the runway incursion mitigation (RIM) program. Runway incursions occur when an aircraft, vehicle, or person enters the protected area of an airport designated for aircraft landings and takeoffs. The FAA works with airport sponsors included in the RIM program to identify, prioritize, and develop strategies to mitigate risks at airfields with a history of runway incursions. The proposed action will modify the airfield at MIC to reduce the likelihood of future runway incursions.

Section 4(f) of the US Department of Transportation (DOT) Act requires the DOT to make an effort to preserve public park and recreation lands; wildlife and waterfowl refuges, and historic sites. It also prohibits the use of Section 4(f) resources if a feasible and prudent alternative is available. In accordance with the requirements of Section 4(f), the FAA has issued the attached Preliminary Section 4(f) de minimis finding for tree removal impacts to nearby Edgewood Park related to the proposed improvements to the Airport.

The FAA respectfully requests that you review the finding and provide comments or concurrence as appropriate. I have also attached a tree growth study that was utilized to aid in our analyses for impacts to Edgewood Park trees. Please let me know if you have questions or desire further information.

Sincerely,

Joshua Fitzpatrick
Environmental Protection Specialist
FAA – Minneapolis Airport District Office

Cc: Evan Barrett, Mead & Hunt
March 7, 2019

Mr. Joshua Fitzpatrick
Environmental Protection Specialist
FAA-Minneapolis Airport District Office
6020 28th Ave. So. Suite 102
Minneapolis, MN 55450

Re: Section 4(f) de minimis Finding for a Safety Improvement and Airport Development Project at the Crystal Airport.

Dear Mr. Fitzpatrick,

The City of Brooklyn Park has worked closely with MAC and Mead & Hunt representatives to develop a plan for tree removal in Edgewood Park that will provide increased safety for Crystal Airport and not be detrimental to the park.

Staff has reviewed the Section 4(f) Evaluation and Preliminary Finding and are in concurrence with the information, analysis and recommendations in the document as presented.

Please let me know if you require additional information.

Sincerely,

Jody Yungers
Director of Recreation and Parks
City of Brooklyn Park

c. Cindy Sherman, Planning Director
   Evan Barrett, Mead & Hunt
   Neil Ralston, MAC