



## Memorandum

December 11, 2021

**To:** NEPA/NHPA Administrative File

**From:** Jean S. Fraser, Chief Executive Officer

**Subject:** Main Parade Lawn: Written Determination under 36 CFR 1001.5 for public use restrictions

---

Using my authority as Chief Executive Officer of the Presidio Trust, under Presidio Trust Board Resolution 04-14, *Delegation of Emergency Powers to Executive Director*, and Presidio Trust Board Resolution 04-15, *Authority of Executive Director to Establish Public Use Limits and Closures*, **I am imposing public use restrictions on organized sports, any activities which use stakes, clubs, or other materials that penetrate the group, and other related activities at the Main Parade Lawn.**

The Main Parade Lawn (MPL) is an approximately 4-acre public lawn located in the Main Post of the Presidio, between Montgomery, Lincoln, Graham, and Sheridan Streets, a short walk from the Presidio Visitor Center. As set forth in the Presidio Trust Management Plan (PTMP), the Main Post is “a focal point for visitor orientation as well as a community center where people live, work, and enjoy themselves. The district’s rich historic buildings and landscapes will be preserved, the historic parade ground re-established, and other outdoor spaces rehabilitated.” PTMP at 12.

The MPL is a valuable cultural landscape resource of the Presidio. Framed by rows of historic buildings and San Francisco Bay views, the MPL was transformed in 2011 from a paved parking lot to a large green space of managed turf. “The ‘greening’ of the Main Parade Ground ... would create a new focus for a variety of visitor activities and transform the quality of the open spaces.” PTMP at 82. Since the greening of the MPL in 2011, the MPL has remained open to the public as a shared space for passive recreation, leisure activities and special events, and regularly serves as an outdoor gathering space for informal, small groups. The Trust is committed to maintaining an atmosphere at the site that is open, inviting, and accessible to all, while also protecting and preserving this asset.

Routine maintenance of the turf is performed at the highest standard year round. This requires mowing three times per week, seeding and fertilizer three times per year, and other turf stewardship activities. The Trust’s annual cost to maintain the MPL turf is more than three times the cost per square foot to maintain other turf in the park due to the high standard of maintenance.

The MPL was not designed for and is not managed to support activities that would occur on an athletic field, such as organized sports. Increased athletic sports use of the MPL is causing significant damage to the turf. The current damage from organized sports is increasing the Trust's turf maintenance expenses by over 30% or \$25,000 annually. In addition, the damage is reducing the use of the MPL by the public because the turf requires longer periods of time to rehabilitate than without these activities. The activities also have the potential to disturb gopher protection and irrigation systems.

Organized sports activities are also incompatible with passive recreational visitor uses at the MPL. Put another way, when a team sets up nets and/or cones to create a playing field, they are implicitly and explicitly excluding others from using the space. In addition, the use of balls and clubs on the MPL poses dangers to other visitors.

The Trust provides alternative locations in the park for permitted organized sports uses, such as Fort Scott Field and Paul Goode Field. These sites are designed and managed for athletics.

Another incompatible use is the use of ground-penetrating stakes or other items. The Trust spent \$11M to create the sophisticated irrigation and pest-protection system that underlays the grass on the MPL. When people use cleats for sports, or push stakes into the ground for nets, tents or umbrellas, or otherwise dig into the ground, the irrigation and pest protection systems can be damaged. Repairing the damage is both expensive and disruptive, since the turf must be dug out, the item repaired or replaced, then new turf laid and protected while it establishes roots.

The following public use restrictions are established immediately for the MPL for the protection and preservation of the MPL, the safety of visitors, the equitable allocation and use of park areas, and the avoidance of conflict among visitor uses. These restrictions are location-specific and limited to what is necessary to protect the MPL's resources, to promote visitor safety and enjoyment, and to meet park management needs. Less restrictive measures will not suffice because they would require a significant modification to the resource management objectives of the site and significantly increase costs for the maintenance and repair of damages from incompatible uses of the turf.

#### MPL Site Use Restrictions:

- 1) **Organized sports prohibited.** Organized sports that damage the lawn or portion off a section of the MPL for the limited use of one group, including but not limited to soccer, lacrosse, golf, volleyball, and football, are prohibited. This prohibition is consistent with the Presidio Trust Act, the PTMP, and the authority to impose use restrictions provided in 36 CFR 1001.5.
- 2) **Ground disturbance or staking prohibited.** Penetrating the ground with any object, not limited to staking tents, umbrellas, or goal posts, wearing or using cleats that penetrate the ground surface, or digging or otherwise disturbing the turf or ground surface, is prohibited. This prohibition is consistent with the Presidio Trust Act, the PTMP, and the authority to impose use restrictions provided in 36 CFR 1001.5.

The Trust will provide public notice of these public use restrictions by posting information on the Trust's website and signs posted at key locations.