



June 6, 2023

Andrea DeKoter
Committee Manager
National Park System Advisory Board
Washington, DC 20240

Dear Ms. DeKoter and the Members of the Advisory Committee on Reconciliation in Place Names:

On behalf of our more than one million members and supporters, The Wilderness Society writes to ask that you please accept the attached statement of support and recommendations for action for the Advisory Committee on Reconciliation in Place Names in their meeting on June 14 and 15, 2023. We respectfully request that this letter be included in committee record.

Unfortunately, I am unable to attend this meeting myself due to a prior commitment. My colleague Jessica Lambert (enrolled citizen, Choctaw Nation; first-generation descendant, Eastern Band of Cherokee Indians; descendant, Chickasaw Nation) will be attending this meeting in-person on behalf of TWS, along with numerous of our colleagues who will be attending virtually.

Thank you for considering our views. Sincerely,

A handwritten signature in cursive script that reads "Starlyn Miller".

Starlyn Miller (Little Shell Chippewa/Menominee/Mohican) J.D.
Native Lands Partnership Director
The Wilderness Society



**Advisory Committee on Reconciliation in Place Names
June 2023 Public Comment**

**The Wilderness Society's
Statement of Support and Recommendations for Action**

Introduction

The Wilderness Society thanks the members of the Advisory Committee on Reconciliation in Place Names (ACRPN) for their work on the important issue of changing racist and derogatory place names on public lands. The Wilderness Society is dedicated to supporting and uplifting efforts to change racist and derogatory place names, as this is a widespread issue on public lands that makes spaces uncomfortable and unwelcoming for many people. We celebrate and share the Committee's commitment to making our lands more equitable and inclusive and want to extend our willingness to help in whatever way is most beneficial to the committee.

In our written comments, we would like to respond to a few of the questions raised at the last public meeting of the Advisory Committee in December 2022. First, we will discuss derogatory commemorative and administrative names and provide our recommendation on whether to include these names within the scope of the Committee's work. We will also highlight some specific terms that we have identified as derogatory and are still being used as place names today. Finally, we comment on the need for structural changes in the renaming process and greater public notice for ACRPN meetings.

Comments

1. Commemorative Names

One key topic of discussion at the last Committee meeting was defining "derogatory" and determining the scope of the Committee's work. Committee members discussed whether derogatory commemorative place names – places named after individuals who have caused harm and perpetrated violence – should be within the scope of the ACRPN's work.

The Wilderness Society strongly believes that examining commemorative place names is essential to the work of identifying derogatory names on public lands. Derogatory commemorative names condone the violence and harm perpetrated by the named individuals. In doing so, they create an unwelcome environment that makes entire groups of people feel uncomfortable and excluded and deters them from visiting and experiencing public places. Commemorative place names that are harmful, create an unwelcome environment, and condone discrimination and violence need to be removed.



For that reason, we believe derogatory commemorative place names should be within the scope of the Committee's work.

A common argument against removing derogatory commemorative names is that their renaming erases history. The Wilderness Society believes changing derogatory commemorative names provides an opportunity to tell a more inclusive and representative history of our country. One way to do this is by replacing derogatory names with the names of noteworthy individuals who have been previously excluded from the historical narrative. Another way is by returning Indigenous names. In addition, we believe renaming should be coupled with storytelling and sharing information about the history of the area, which can be done through plaques, brochures, informational sessions, and other actions. Doing so allows us to tell the story of the land, a story that can include discussion of the renaming and the process that led to it. The top priority of renaming discussions needs to be ensuring our public lands are welcoming and inclusive to all people. This cannot happen without renaming of derogatory commemorative names.

2. Administrative Names

Another point of discussion at the last Committee meeting was whether the committee should examine derogatory administrative names – the names of roads, trails, buildings, and other constructed features on federal lands. Committee staff noted that although administrative names are not in the charter of the Secretary's order establishing the ACRPN, the Committee members could choose to address these names.

The Wilderness Society recognizes that addressing administrative names would be additional work for the Committee. However, we believe the additional work would be well worth the benefits of furthering the removal of these additional derogatory names. We anticipate that the work to identify derogatory administrative names will overlap to a large degree with the work in which the committee is already engaged. For that reason, we urge the Committee to have the largest impact possible by including derogatory administrative names within the scope of its work.

3. Derogatory Names

The Wilderness Society would also like to highlight a few terms that we have identified that, from our perspective, are clearly derogatory and offensive but still exist as place names on public lands. These names are places that include the words Red Skin/Redskin, Savage, Chinaman, Injun, Dead Indian, Bitch, Negro, Coon, and Uncle Tom. This list is by no means comprehensive. We urge the committee to recommend that places with names that include these terms be replaced.



4. Structural and Logistical Changes

In addition to addressing existing derogatory and offensive names on public lands, we urge the Committee to recognize the need for structural changes in the renaming process. The current process is too slow, lacks transparency, and does not welcome public involvement. We also see a need for more concrete tribal representation on state naming boards, such as dedicated seats for tribal delegates. Further, even though the Board of Geographic Names is a federal agency charged with establishing uniform names for federal use, the current process effectively defers to states by giving them veto power over naming decisions. As a result of these shortcomings, racist and offensive names stay on the landscape. The process must be reformed to be more inclusive, equitable, transparent, and open to the public.

In addition, to better increase and encourage deeper public participation with the Advisory Committee, we urge committee staff to give earlier public notice about both the ACRPN meetings and the meeting agenda. Doing so would allow us and our partners more time to prepare for the meeting and draft comments. Seeing an agenda earlier will also allow us to better tailor written comments to the topics of the meeting. This would allow for better and more thoughtful engagement with the Committee from outside organizations and partners.

Conclusion

Thank you for taking the time to read and consider our comments. We want to reiterate that we are excited about the work this group is doing and would love to be involved and help in whatever way is most useful for the committee.