

United States Department of the Interior

NATIONAL PARK SERVICE 1849 C Street, NW Washington, DC 20240

June 29, 2018

To: NPS Deputy Member

U.S. Board on Geographic Names

From: Deputy Director /s/ P. Daniel Smith

Exercising the Authority of the Director

Subject: Geographic Name Change Proposals

This memorandum supplements <u>Staff Directive 80-4</u>, "Geographic Name Proposals," revised August 16, 1995.

Proposals to change the names of geographic features on the grounds that the existing official names are derogatory or offensive are being submitted to the U.S. Board on Geographic Names (BGN) with greater frequency these days. Many of these proposals concern features in or adjacent to National Park System units.

POLICY GUIDANCE

While our National Park Service (NPS) Staff Directive 80-4 does not specifically address name change proposals, the BGN's *Principles, Policies, and Procedures* (2016) (PPP) state in pertinent part as follows:

Policy II. Name Changes

Geographic names provide important spatial, cultural, and historical references. . . . This requires a high degree of stability in the written form of a name and its application. Consequently, changes in existing names should not be made without a compelling reason. . . . The BGN recognizes . . . name changes . . . made to eliminate particular name problems[,] as in proposals involving names asserted to be offensive

Sec. 1 Existing names, especially personal commemorative names, which honor an individual, and those names in longstanding public usage, should not be changed unless the proponent presents a compelling reason to do so.

Policy V. Derogatory and Offensive Names

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Because geographic names are part of the historical record of the United States, the BGN prefers to proceed cautiously with regard to the use of names in everyday language, as attitudes and perceptions of words considered to be offensive can vary among individuals and communities and can change connotation over time. Accordingly, the BGN will act on a case-by-case basis.

Guidelines

Any individual or agency may submit to the BGN a proposal to change an existing name that they consider offensive. Such proposals should include reasons why the proponent believes the existing name is offensive. The proponent must offer an alternative name as part of the proposal

In proposing an alternate name, a conscientious effort should be made to offer an alternative name that does not eliminate or obscure the original intent of the geographic name as a historical record on the cultural landscape, taking into account the historical, cultural, or ethnic significance of the original name.

In spite of the guidance contained in the PPP, because much of the analysis will be subjective in nature—or because of the non-NPS parties involved—in some cases it may be extremely difficult for the affected park/region to decide on a name change proposal. This, in turn, will make it hard for the Deputy Member to determine an official NPS position, if any.

PROCEDURAL STEPS

In addition to the difficulties associated with deciding name change proposals on their merits, some could generate a great deal of controversy and/or media attention. In those instances, the Deputy Member should brief the Director. Accordingly, whenever the Deputy Member concludes—or is advised by a park or region—that a name change proposal is likely to be highly controversial and/or generate media attention, the Deputy Member will seek the advice of the Director. The Deputy Member will do this at the earliest opportunity, and certainly before communicating any NPS position to the BGN staff.

In such cases, the Deputy Member will remind park personnel that Staff Directive 80-4 requires them to "refrain from actively or formally supporting the proposal until first conferring with" both the (1) regional geographic names coordinator (if any), and (2) the Deputy Member. Similarly, the Office of Communications will be instructed not to comment to media outlets until such time as the Deputy Member—after briefing the Director—has formulated an official NPS position, and communicated the same to BGN staff.

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