

Advisory Committee on Reconciliation in Place Names  
National Park System Advisory Board  
June 4, 2024

Dear members of the Advisory Committee on Reconciliation in Place Names,

The Coalition for Outdoor Renaming and Education (CORE) extends gratitude to the members of the Advisory Committee on Reconciliation in Place Names (ACRPN) for their dedication to renaming racist and derogatory place names. As a coalition of environmental, Indigenous, and conservation organizations, as well as concerned individuals from across the United States, CORE is committed to promoting reconciliation, justice, education, inclusivity, and access to outdoor spaces.

We commend the ACRPN's efforts from their last public meeting in identifying a list of derogatory geographic feature names and derogatory federal land unit names. We recognize the complexity and sensitivity involved in this task, and we appreciate the thoughtful consideration given to each name on the list. It is through such diligent efforts that we can move towards more just and equitable representation and recognition of our shared landscapes and the stories behind them. We urge the ACRPN to move forward with renaming the names presented and voted on as derogatory at the last public meeting, as well as the additional derogatory names CORE identified and presented in our public comment to the ACRPN in November.

In this public comment, we are writing to provide recommendations to the Committee, including urging the ACRPN to reconsider the proposal to unilaterally replace the racist term "c\_\_n" with the term "raccoon," suggestions for a successful renaming process, and recommendations to increase communication and public engagement in the ACRPN's work.

### **Geographic Features Subcommittee Proposal on the Term "c\_\_n"**

We agree with the ACRPN's assessment that the term "c\_\_n" is racist and should be renamed, particularly given its prevalence in place names across the country. However, the Geographic Features Subcommittee's proposal to unilaterally replace all of these names with the term "raccoon" is a missed opportunity for community engagement, reconciliation, and healing. The ACRPN's current plan for replacing the word "c\_\_n" with "raccoon" erases the racist history of many of these places and instead sends the message that these names are all simply shortenings of "raccoon." We know that this is not the case and many of these names have a clearly racist history and continue to harm people who encounter these places. It is important that the ACRPN instead allows community involvement in the renaming of these places, particularly by allowing Black communities impacted by the derogatory term to select their preferred replacement names. Taking this approach centers reconciliation, reckoning with history, and community engagement. As the ACRPN recognizes in their Reconciliation Principles, these principles must be central to renaming work in order for it to be meaningful and successful.

We would also like to oppose the justification provided for the unilateral replacement of "c\_\_n" with "raccoon" written in the published notes from the ACRPN's November meeting, which argues that if communities wish to select their own name for these places, they should go through the BGN renaming process. We believe that asking communities to undertake a BGN

renaming process for a location that was just renamed is overly burdensome and will likely deter participation.

We recommend revising the recommendation outlined in the Geographic Features Proposal, which would unilaterally replace all “c\_\_n” place names with the term “raccoon” to instead conduct a community-driven renaming process in the same manner that other ACRPN-identified derogatory names will be renamed.

## **Renaming Process**

We urge the ACRPN to move forward with a swift, community-based renaming process. We have heard that the DOI’s process for renaming places with the name sq\_\_ was efficient and, for the most part, worked well. However, there are parts of this process that could be improved:

- Holding a minimum 90-day dedicated Tribal consultation period prior to soliciting recommendations from the public through a public comment period. This way State voting boards can review Tribal feedback before initiating the public comment period.
- Extending the public comment period to 90-days at a minimum. This gives communities adequate time to conduct research and discuss internally to identify replacement name recommendations.
- More robust outreach and education related to the forthcoming renamings and how communities can be involved. This may include direct outreach to impacted communities, organizations, and Tribes near sites being renamed and the distribution of educational resources on the renaming process and the ACRPN’s work.
- Hosting in-person listening sessions in various geographical locations, particularly near locations being renamed. These listening sessions will foster a more inclusive and participatory process and will provide more opportunities for community members to engage with the committee and your work.

In addition, if the ACRPN is considering recommended changes to the BGN renaming process, we would like to see the BGN directly notify petitioners when their proposal is being considered by the BGN. We would also like to see the BGN accept proposals for bulk name changes - particularly those for a single or similar name in multiple places - under a single application.

## **Communication and Public Engagement**

To foster more community engagement and input on the ACRPN’s work, we have several recommendations that would increase transparency and communication between the ACRPN and the public. These include advance posting of meeting materials, more frequent public meetings, and more transparency on the ACRPN’s work in the time between public meetings.

First, posting meeting materials - including agendas, proposals, and other materials - at least a month prior to the start of public meetings will give organizations and community members time to read, analyze, and reflect on the materials so they can adequately prepare written and verbal

public comments. This will enhance the quality of public comments and allow for more informed contributions from all stakeholders. Particularly for organizations such as CORE, which circulates public comments for sign-on by member organizations, we need to complete our written public comments weeks in advance of the meeting to allow our members adequate time to review the letter and sign-on. Without materials or an agenda in advance of the meeting, we are unable to reflect on and incorporate these materials into our public comments.

Second, in order to enhance communication of the ACRPN's work, we recommend that the ACRPN hold two additional (virtual) meetings per year. Particularly given that public meetings are the only time the ACRPN is able to convene as a whole, take actions, and discuss outside of subcommittees, we believe that increasing the ACRPN's meeting frequency to every three months will increase the ACRPN's efficiency. These additional meetings will also help organizations and members of the public stay better involved with the ACRPN's work and provide more frequent and meaningful recommendations, comments, and feedback. Additional meetings are within the scope of the ACRPN's charter, which states that "The Committee will meet approximately two to four times annually and at other such times as designated by the DFO." These additional meetings could be held virtually to limit their financial cost and logistical burden.

Finally, we suggest that the ACRPN implement a standard practice of publishing monthly subcommittee update reports. These reports can be relatively short and informal, and would serve to update members of the public on the ACRPN's work, including the committee's current activities, points of subcommittee discussion, and key focus areas. Transparency is crucial in building trust and maintaining ongoing community support, which can, in part, be achieved by publishing monthly updates on the ACRPN's work. These updates would provide stakeholders with insights into the decisions being made and the rationale behind them, ensuring that the Committee's work and renaming process is both transparent and accountable. This would also allow the public to provide informed public comment in the period of time between public meetings, increasing public engagement and ensuring a continuous flow of feedback and dialogue.

## **Conclusion**

We thank you for considering our comments on these important issues. We look forward to continued engagement with the ACRPN moving forward.

Sincerely,

*Organizations:*

AISES - Advancing Indigenous People in STEM  
Atlantic Black Box  
Children & Nature Network  
Color My Outdoors  
Coalition for Outdoor Renaming and Education

Earthrise  
Indigenous East  
Junior North American Indian Women's Association (NAIWA), Eastern Band of Cherokee  
Indians Chapter  
Just-Trails  
KABOOM!  
Lakota People's Law Project  
MountainTrue  
Mountain Surf Creative  
National Association of Tribal Historic Preservation Officers  
National Congress of American Indians Youth Commission  
National Parks Conservation Association  
Native Organizers Alliance  
Next 100 Coalition  
North American Indian Women's Association, North Carolina Chapter  
Oregon Natural Desert Association  
Ready to Implement Solutions for Equity (RISE) in Hiking Collaborative  
Sacred Defense Fund  
Sierra Club  
Southern Appalachian Highlands Conservancy  
Southern Environmental Law Center  
Tali Elohi  
The Wilderness Society  
West End Revitalization Association - WERA  
Winter Wildlands Alliance

*Individuals:*

Alia Dietsch  
Alyson Merlin  
Callum Cintron  
Cassidy Schoenfelder  
Grey Don Johnson  
Jake Kulaw  
Jarrah Botello  
Jessica Lambert  
Jessy Stevenson  
Julia Jaffe  
Julie Judkins  
LaKyla Hodges  
Mike Carter  
Niki Geisler  
Olivia Porter  
Sam Woosley  
Sarah Lindley  
Shar Bassette  
Sherman Neal II

Simone Adams  
Tamika Graham  
Zoie Bills