

WRITTEN PUBLIC COMMENT
ADVISORY COMMITTEE ON RECONCILIATION IN PLACE NAMES
MEETING OF JUNE 10 and 11, 2024

FORM LETTER ON BEHALF OF THE ACTION NETWORK

[Note: this is text taken from identical or near-identical form letters received from several thousand individual email addresses]

National Park System Advisory Board & Advisory Committee on Reconciliation in Place Names,

Thank you for all of your hard work to remove derogatory place names from across the country. This work is essential to ensuring our outdoor spaces are welcoming, inclusive, and safe for all.

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 identified in public comment letters 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.

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.