# Federal Advisory Committee on Reconciliation in Place Names Processes & Principles Subcommittee Draft Recommendations for June 10-11, 2024 Meeting

## **General Process:**

1. Whereas commemorative and other names being considered by Congress can run counter to the regulations and policies of the USBGN,<sup>1</sup>

It is recommended that the ability to place a name on the Nation's landscape be reserved or limited to the United States Board on Geographic Names as intended by the original Congressional action of 1890.

#### For U.S. Board on Geographic Names:

 Whereas eradicating derogatory or offensive place names from the Nation's landscape should be given higher priority than other name change proposals and;

Whereas the harm to historically marginalized citizens is perpetuated in the use of derogatory names and that this harm is real, ongoing, often under-discussed, and thus more urgent than other matters of geographic naming,

It is recommended that the USBGN create a transparent framework for prioritizing the response of staff and the Board in evaluating, researching, and acting upon renaming proposals, with a higher priority placed on public requests to address derogatory or offensive place names versus those deemed by staff as requiring less immediate or urgent action, noting less important applications may be deferred for an unknown period of time (years).<sup>2</sup>

2. Whereas the timeline for issuing decisions on proposals before the Board regarding derogatory or offensive names may be considered unacceptably long, and inadequate staffing is a major contributing factor to these delays,

It is recommended that additional research and administration staff be hired by the U.S. Geological Survey for the USBGN to perform additional outreach and research on applications received and to support enhanced focus on derogatory place name elimination and mitigation. Further, it is recommended that the USBGN policies be updated to define a reasonable timeframe of 5 years or less for USBGN action on proposals to remedy derogatory or offensive place

# names, after which time it would be forwarded to the Secretary for executive action.<sup>3</sup>

 Whereas most Native languages and their systems of naming are endangered cultural resources which carry important historical and ecological information as well as holding deep cultural and spiritual significance to Tribal communities, and have been ignored, limited, misrepresented or otherwise lost,

It is recommended that policy be enacted within the USBGN guiding documents that favors restoration and preservation of Native place names on the National Map.

- 4. Whereas the scholarly and scientific understanding of derogatory language and its impacts on people's wellbeing has expanded significantly since the original adoption of USBGN policies and procedures,
  - It is recommended that the USBGN definition of "derogatory" be amended to reflect the broadened and more inclusive definition now formally adopted by this Committee.<sup>4</sup>
- Whereas the timeline for acting upon and issuing decisions on legitimate name change proposals could be shortened considerably by a reduction in the number of frivolous, incomplete, or otherwise noncompliant proposals received by the USBGN,
  - It is recommended that the USBGN develop an easily discoverable and brief online training module on how to complete an application for a place name change proposal which would be required of all members of the public submitting a proposal to the USBGN before a proposal can be processed and acted upon by USBGN staff.
  - It is further recommended that accessibility issues and paper versions be available to marginalized communities.<sup>5</sup>
- Whereas derogatory and offensive names are triggers for the toxic effects of personal and intergenerational trauma to certain marginalized groups long harmed by such names,
  - It is recommended that a "content warning" be added to entries in the Geographic Names Information System and all web pages of the USBGN to caution members of the public about the possibility of seeing and interacting with derogatory or offensive place names as they explore data and other information.<sup>6</sup>

- 7. Whereas open and transparent government requires that the public be given every opportunity to participate in deliberation and providing feedback,
  - It is recommended that the USBGN make public the list of proposals being considered ahead of monthly meetings for public review with clear and evident links posted on the website. The Board should also make posted links to monthly meetings (including how to participate) more visible on its website and create a forum for feedback before monthly votes.<sup>7</sup>
- 8. Whereas the use of generic and arbitrary names to replace removed derogatory place names has not yielded satisfactory results, and appropriate processes for finding replacement names may take months or even years of Tribal consultation and local engagement,
  - It is recommended that the USBGN adopt policies that allow for "unnaming" places for the duration of this process, implementing neutral markers instead of quickly chosen and arbitrary replacement names. Additionally, the use of multiple names, including hyphenated names, for individual geographic features should be encouraged to reflect the diverse histories and traditions associated with the land or landscape.<sup>8</sup>
- 9. Whereas the use of the word 'primitive' has been deemed harmful and inappropriate for use regarding humans or human culture,
  - It is recommended that the word be removed from Policy IV, Paragraph 4 in the USBGN Principles, Policies, and Procedures.<sup>9</sup>
- 10. Whereas uncoordinated naming decisions and actions by local, Tribal, State, and Federal governments have historically resulted in discrepancies between the National Map and other sources of geographic information,
  - It is recommended that States be allowed to submit directly to the USBGN any terms determined to be derogatory or harmful, and that the USBGN immediately (in the absence of countervailing law or regulations) accept suggested replacements from State Authorities, which include (but are not limited to) State Names Authorities, County Commissions, Legislative rulings, and Governor declarations and reconcile the National Map accordingly.<sup>10</sup>

## **Endnotes Providing Detailed Justifications and Context**

- 1. The United States Board on Geographic Names (USBGN) was created by Congress in 1890 and established in its present form by Public Law in 1947 (Pub. L. 80-242) to maintain uniform geographic name usage throughout the Federal Government. The USBGN seeks to involve the public in its research and actions regarding application of place names and renaming. There are instances where individuals, including elected officials, politicize place names by attaching name changes to Federal bills outside the USBGN process, which can bypass public input and Tribal consultation.
- 2. The Secretary of the Interior identifies the eradicating of derogatory or offensive place names from US landscapes as a nationally important and urgent priority. The USBGN should operate in a full and highly engaged capacity to address that priority in a timely way and deploy the resources necessary for name reform. A large volume of applications for naming geographic features takes up valuable time of the staff and the Board. This process should be carried out in a manner that is clear and transparent to the public. Proponents for low-priority proposals should be notified of delayed response and action time.
- 3. The USBGN has limited staff available to provide enhanced public response to issues related to derogatory names. The adopted Guiding Vision and Principles of this Committee states: Place name reconciliation should be participatory. The replacing of derogatory place names alone is not sufficient if not accompanied and guided by public consultation. In particular, it is imperative that the place renaming process be informed by and accountable to the views and experiences of those groups negatively impacted and excluded by derogatory names.... [G]overnment bodies should be responsive to public concerns about derogatory names and engage in active and continual examination and improvement of procedures for requesting, reviewing and changing names."
- 4. The Federal Advisory Committee on Reconciliation in Place Names was tasked with constructing a comprehensive definition of "derogatory" to facilitate identification and removal of offensive place names in the country. The cautious and technical tone of the current USBGN document belies the importance of the issue of derogatory names and could be interpreted as demeaning by those groups historically harmed by those names.
- 5. Much of the American public is generally unaware of the processes behind naming features on the nation's landscape. Information is difficult to locate on the current USBGN website. Educational tools and programs on the Principles, Policies, and Procedures of the USBGN are needed to inform the public petitioner of the many steps of Board evaluation, criteria, and decision-making processes, including a realistic statement of the time an average proposal takes and the explanation of reasons proposals might be delayed. It is hoped that the recommended mandatory

training would improve the applications/proposals received by the Board and minimize the number of less fully formed proposals that have little chance of approval but take up valuable staff time. This module could be incorporated into the already existing educational materials at USBGN while also being the basis of newly developed outreach efforts. With the help of this training, members of the public submitting applications to the USBGN would be encouraged to submit thorough applications that include collection of local support, evidence/research, photos/maps, and communication with local governments/SNA/or other related agencies – all of which increase the effectiveness of any proposal. Not all members of the American public have equal access to technology or may be limited in physical capacities that may prevent equal access to the information available exclusively on a website prompting the need for training through other means.

- 6. There is a fundamental recognition by the USBGN through its guiding documents and past actions that derogatory place names do indeed negatively affect people. Content warnings are used by naming authorities in other countries.
- 7. The general public is often unaware of the format and schedule of USBGN meetings. The Guiding Vision and Principles of this Committee stress the importance of the naming process embracing inclusion and fairness in public participation. Specifically, that document states: "The traumatic effects of many derogatory place names come not just from the harmful name itself, but also from a history of governmental leaders maintaining theses names, even after the harm created by them is known and after repeated ignored requests to change."
- 8. Other nations have implemented a method of "unnaming" places. Other nations have implemented a system of applying multiple names to landscape features. Unnaming would instantly allow for the removal of problematic place names (to be replaced by a temporary identifier until a permanent name is determined through community engaged renaming). These temporary identifiers could be the use of simple coding, GPS coordinates, or Feature IDs as listed in the Geographic Names Information System (GNIS). Multiple names attached to the same place would allow for recognition of known Native names, or names used by multiple groups historically occupying the area, with equal interests and equal validity in establishing a new or replacement name for a geographic feature.
- 9. Anthropologists object to the use of the word "primitive" when referring to humans or human culture. Although the use of the word "primitive" in USBGN policy relates to wilderness and the natural environment, its use as a label for our lands in a sociocultural context with regard to avoidance of human language (the largest of all cultural elements), should encourage action to replace.

10. Precedent exists in Policy X within the USBGN Principles, Policies, and Procedures. Tribes are, through Policy X able to name features on their lands with no decisions or management from the USBGN. States have the potential to discover and identify words unique to their particular geographies they wish to remove or rename due to locally determined understandings of the definition of 'derogatory.' States have potential to solicit local opinion more directly. Current process for the BGN includes outreach to State Names Authorities seeking statements on local usage and local support. If the names are being sent proactively to the BGN by elected officials or representatives, by definition there is local support and the BGN should accept these names in favor of enabling local voice and expediting federal process.