



Kevin Colburn  
National Stewardship Director  
P.O. Box 1540  
Cullowhee, NC 28723  
828-712-4825

[www.americanwhitewater.org](http://www.americanwhitewater.org)  
[kevin@americanwhitewater.org](mailto:kevin@americanwhitewater.org)

April 24, 2022

Michael Tischler  
Director, National Geospatial Program, U.S. Geological Survey, Chair,  
DOI Derogatory Geographic Names Task Force.  
1849 C Street NW, Room 6657  
MS 6640-MIB  
Washington, DC 20240.  
*Submitted Electronically <taskforce\_consultation@ios.doi.gov>*

RE: DOI-2022-0001 - Comment on Secretarial Order 3404 Reconciliation of Derogatory  
Geographic Names

Dear Mr. Tischler:

On behalf of American Whitewater, I am writing in support of the goals of Secretarial Order 3404, which declares “sq--” a derogatory name and provides a process framework to remove the term from use by renaming 664 features.<sup>1</sup> This important effort is long overdue.

*Interest of American Whitewater and General Comments*

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,200 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater’s mission is to protect and restore America’s whitewater rivers and to enhance opportunities to enjoy them safely. As leaders and partners in river management nationwide and as representatives of the paddling community, American Whitewater has an interest in ensuring place names are respectful and not derogatory. We maintain the National Whitewater Inventory on our website, which is an online guide to over 6,000 whitewater river reaches. We have found several examples of derogatory places names for rivers, as well as geographic features along rivers, within our National Whitewater Inventory. We are in the process of removing these derogatory names from our website, and that effort would be much more straightforward and cause less

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<sup>1</sup> Order No. 3404, Declaring “Squaw” a Derogatory Term and Implementing Procedures to Remove the Term from Federal Usage, Secretary Deb Haaland, November 19, 2021, <<https://www.doi.gov/sites/doi.gov/files/elips/documents/so-3404-508.pdf>>.

confusion if we could simply adopt replacement names approved by the Board of Geographic Names.

We support prioritizing the adoption of replacement names received through Tribal Consultation in developing a single recommended replacement name for each feature the Department of Interior has identified. We also understand The Board on Geographic Names has received several proposals to rename a feature covered by Secretarial Order 3404 through their conventional process, and we support the proposal to prioritize these proposed names as appropriate ahead of the candidate replacement names on the list.

Many of our nation's rivers, and the geographic features along their shoreline, had names prior to colonization but these names were replaced with names that in several cases are racist or derogatory. These names are not only offensive but signal that the outdoors is not welcoming to everyone, including Native peoples who have deep cultural and legally-protected connections to our nation's rivers. American Whitewater believes that a small but critical step in creating a future where everyone feels safe and welcome outdoors is removing racist and offensive names, starting with the term "sq--," and replacing them with equitable and inclusive alternatives.

While we are eager to immediately make changes and update geographic names in our National Whitewater Inventory, we support proceeding through this process at a pace that gives Native peoples adequate opportunity for meaningful engagement. We are committed to partnering in the effort to communicate new names clearly and consistently with the mapping resources we provide for recreational river runners.

### *Specific Replacement Name Suggestions*

American Whitewater offers two specific suggestions for replacement names contingent on direct consultation with area Tribes by the Department of Interior.

Sq-- Valley Creek: GNIS ID = 235327, Feature Class = Stream

- Candidate Names Provided: Intake Spring, Peterson Flat, Two Pine, Mule Shoe, and Cold Spring
- American Whitewater's Replacement Suggestion: Rhubarb Creek

Justification: Sq-- Valley Creek is a major tributary of the McCloud River, originating on the southern slopes of Mt. Shasta that flows through the traditional homeland of the Winnemem Wintu people. Recreational users enjoy both hiking opportunities on the trail paralleling the creek and whitewater boating opportunities on the creek itself. Confusingly the Forest Service has started to refer to the trailhead as the Cabin Creek Trailhead even though the trail goes along Sq-- Valley Creek and not Cabin Creek, which is a tributary. Candidate names provided do not capture the unique attributes of this creek and do not meet the Board on Geographic Names local use and acceptance policy. American Whitewater recommends a unique and distinct name, as opposed to the more generic candidates provided, and offers Rhubarb Creek as a replacement suggestion in reference to the high density of Indian Rhubarb (*Darmera*

*peltata*) found along this creek. As noted by the Forest Service, "Indian Rhubarb grows thickly along the rocky shores shading the water beneath and dark formations of basalt hem the stream and provide spectacular bluffs and obstacles to the water's flow."<sup>2</sup> This striking botanical feature of the creek is recognized by local members of our community who enjoy recreational opportunities this creek provides; we believe it conforms to a name that would receive local use and acceptance. Another possible replacement suggestion for this creek could be Wintu Creek thereby recognizing the presence of the Wintu people. American Whitewater offers these suggestions as alternatives to the candidate suggestions, contingent on other replacement names that may be offered by the Winnemem Wintu Tribe that we would defer to.

Sq-- Leap: GNIS ID = 267635, Feature Class = Cliff

- Candidate Names Provided: San Joaquin River, Big Sandy Creek, Millerton Lake, Auberry Valley, and Kennedy Table
- American Whitewater's Replacement Suggestion: San Joaquin Butte

Justification: Sq-- Leap is a butte and cliff face along the San Joaquin Gorge located within the traditional homeland of the North Fork Mono Tribe. The Bureau of Land Management's Sq-- Leap Management Area was renamed in 2003 to the San Joaquin River Gorge Management Area but the geographic feature itself was not renamed. Of the candidate names provided, San Joaquin is the name most consistent with the Board on Geographic Names local use and acceptance policy for naming geographic features. The name is consistent with the name of the management area administered by the Department of Interior. American Whitewater offers this suggestion contingent on other alternative names that may be offered by the North Fork Mono Tribe that we would defer to.

## Conclusion

American Whitewater is grateful for the leadership of Secretary Haaland in taking this incredibly important step forward to remove derogatory names from geographic features in the United States. We appreciate the opportunity to provide feedback on this process.

Sincerely,



Kevin R. Colburn  
National Stewardship Director

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<sup>2</sup> Shasta Trinity National Forest Website,  
<<https://www.fs.usda.gov/recarea/stnf/recreation/picnickinginfo/recarea/?recid=6590&actid=64>>.