



Sheila de la Guerra *General Public Comment*

From: Rachel White <rachelloveskelseyville@gmail.com>
Sent: Sunday, April 26, 2026 10:34 AM
To: CA Advisory Committee on Geographic Names
Cc: BGNEXEC, GS-N-MAC; bgnexec@nga.mil; exsec@ios.doi.gov; Zahniser, Shellie R; Crowfoot, Wade@CNRA; Thompson, Geneva@CNRA; Brad Rasmussen; Jessica Pyska; Matthew Rothstein; thompson.casework@mail.house.gov; rob.bonta@doj.ca.gov; Baugh, Heather@CNRA
Subject: Clarification on CACGN Policy Language: Association and Perceived Association
Attachments: Percieved Assoication.jpg; 6March2026CACGNDraftRegs.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To The California Advisory Committee on Geographic Names (CACGN)

I am writing to respectfully request clarification regarding the proposed policy language concerning names that may be changed due to an “association” or “perceived association” with rape, murder, genocide, forced relocation, human trafficking, slavery, or other forms of oppression.

I ask these questions in earnest because the current wording appears broad, subjective, and potentially difficult to apply consistently.

First, how is “perceived association” being defined? Perception can vary widely between individuals, communities, generations, and historical interpretations. Does perception mean the view of a single complainant, a majority of residents, a historically affected group, historians, or the governing body itself?

Second, what level of connection is required for a name to qualify as associated?

For example:

1. Must the name be directly and intentionally honoring a specific person?
2. Does it apply if the origin of the name is uncertain or disputed?
3. Does it apply if the name is shared with many unrelated people or places?
4. Does it apply if the community no longer associates the name with the original figure, but instead with the town itself?
5. Does it apply to names derived from ethnic groups, tribes, nations, or communities whose histories may also include warfare, captivity, displacement, or other forms of violence common to many societies?

Third, how far back historically does this standard reach?

Would it apply only to post-statehood California figures? Spanish and Mexican eras? American frontier eras? Or would it also extend to pre-colonial periods, where intergroup warfare, territorial conflict, captive-taking, and forced movement are documented in many parts of the world, including California?

California archaeology has identified skeletal remains with projectile injuries, cranial trauma, defensive settlement locations, and evidence of violent death in multiple pre-contact regions. These findings confirm that warfare and interpersonal violence existed in California before European arrival.

Fourth, what evidentiary threshold will be required?

Will changes be based on:

1. Verified archival documentation?
2. Scholarly consensus?
3. Oral history alone?
4. Newspaper accounts?
5. Popular belief or public perception?

Fifth, how will equal application be ensured?

If one historical category of names is scrutinized for violent associations, while another category is not, that could create the appearance of selective enforcement rather than a neutral standard.

Relatedly, are there any categories of persons, communities, tribes, nations, institutions, or historical groups that would be exempt from or not subject to the same policy criteria? If so, **what is the legal or policy basis for distinguishing those groups from others?**

Section 1009 appears to expressly prioritize California Native American tribal, cultural, and Indigenous language names as replacement names. I respectfully request clarification **whether those same names remain equally subject to the petition standards in Section 1001**, or whether different criteria apply once selected as replacements.

Sixth, is the intended purpose of this policy to comprehensively review place names and institutional names throughout California under one equal standard, or will it be applied only in selective circumstances?

For example, would the same review process apply equally to:

1. Incorporated cities and municipalities
2. Counties and regional districts
3. Public universities and colleges
4. Hospital systems and public facilities
5. Professional sports teams and major commercial institutions (San Francisco 49ers, for example, associated with both the Spanish Mission and the American Gold Rush era violence against California Native populations)
6. Streets, parks, and schools statewide
7. Unincorporated towns and small rural communities

If the policy is not intended to apply broadly and uniformly, what safeguards exist to ensure it is not used disproportionately against smaller communities with fewer political and financial resources to defend themselves?

By way of example only, if “perceived association with violence” is the operative test, many names of all origins could become subject to challenge:

- Names tied to settlers involved in frontier conflict
- Names tied to military figures involved in war
- Names tied to colonial administrators
- Names tied to tribes or nations with histories of warfare or territorial displacement
- Names tied to political leaders whose policies caused suffering
- Names whose origins are uncertain but later interpreted negatively

My concern is that without clear limits, this language may invite inconsistent outcomes based less on evidence and more on changing public sentiment.

I would sincerely appreciate clarification on the intended scope, definitions, evidentiary standards, and safeguards for equal treatment.

Thank you for your time and consideration.

Rachel White

www.savekelseyville.com

**Article I:
General
Provisions**

**§ 1000.
Applicability
and Scope**

**§ 1001.
Definitions**

§ 1001(g)

“Offensive and Derogatory”

- (1) Names with slurs or insults towards any classification of person identified in Civil Code Section 51, or that perpetuate stereotypes or other pejorative ideology.
- (2) Names that represent expressions of prejudice towards any class of person identified in Civil Code Section 51.
- (3) Names honoring or with association or perceived association to specific people, past or present, who: Perpetuated or committed violence including but not limited to, rape, murder, genocide, forced relocation, internment, or human trafficking against any classification of person identified in Civil Code Section 51.

CALIFORNIA NATURAL RESOURCES AGENCY
TITLE: PETITION PROCESS FOR
RENAMING OFFENSIVE AND
DEROGATORY PUBLIC
GEOGRAPHIC FEATURES OR PLACE NAMES
NAMES
DIVISION .
CHAPTER

DRAFT TEXT OF PROPOSED REGULATIONS

Article 1. General Provisions

§ 1000. Applicability and Scope.

This chapter shall be known as the California Natural Resources Agency’s (Agency) Petition Process for Renaming Offensive and Derogatory Public Geographic Features or Place Names. These regulations apply to all petitions made to the Agency’s California Advisory Committee on Geographic Names (CACGN) for purposes of seeking review and possible public name change pursuant to Chapter 17 (commencing with § 8899.90) to Division 1 of Title 2 of the Government Code.

Note: Authority cited: Sections 8899.90, Government Code. Reference: Sections 8899.90, 8899.94 (a).

§ 1001. Definitions

The following definitions shall apply for the purposes of this Chapter:

- (a) “California Advisory Committee on Geographic Names” or “CACGN” or “Advisory Committee” or “Committee” means the working group of state employees established within the California Natural Resources Agency through appointment by the Secretary of Natural Resources for purposes of providing advice and recommendation on public Geographic Features or Place Names located in California.
- (b) “California Native American Tribe” means tribes located in California which are either recognized by the federal government pursuant to the annual list published under the Federally Recognized Indian Tribe List Act of 1994 (25 U.S.C. Sec. 5131) in the Federal Register or non-federally recognized.

- (c) “California Natural Resources Agency” means the cabinet level agency established pursuant to Government Code sections 12800 and 12805.
- (d) “Geographic Feature” means any location or publicly owned structure in California, including, but not limited to, navigable waters of the state, geographic features, parks, state or local roads, bridges, and publicly owned buildings.
- (e) “Notice of Determination” means a document stating the rejection or acceptance of a Petition for a Geographic Feature or Place Name.
- (f) “Notice of Receipt of Petition” means a document stating the Agency has received a Petition.
- (g) “Offensive and Derogatory” means:
- (1) Names with slurs or insults towards any classification of person identified in in Civil Code Section 51, or that perpetuate stereotypes or other pejorative ideology.
 - (2) Names that represent expressions of prejudice towards any class of person identified in Civil Code Section 51.
 - (3) Names honoring or with association or perceived association to specific people, past or present, who: Perpetuated or committed violence including but not limited to, rape, murder, genocide, forced relocation, internment, or human trafficking against any classification of person identified in in Civil Code Section 51.
- (h) “Petitioner” means a person or entity identified in Section 1002(a) who submits a Petition to rename an Offensive and Derogatory Geographic Feature or Place Name.
- (i) “Park” means any publicly owned or managed land primarily undeveloped and intended, at least in part, to preserve natural, scenic, or historic resources or to provide public recreational opportunities.
- (j) “Place” means any natural geographic feature or street, alley, or other road within the jurisdiction of the state or political subdivision of the state.
- (k) “Public Agency” means a California state agency, local governing body, and any other political subdivision of the State of California that has direct jurisdiction over or ownership of the Geographic Feature or Place Name.
- (l) “Secretary” means the Secretary of the Natural Resources Agency consistent with Public Resources Code sections 12800 and 12805.
- (m) “Supporting documentation” means sources in literature, web links, or news articles that

can be verified by third parties as to their accuracy or completeness.

Note: Authority cited: 8899.91, Government Code. Reference: Sections 8899.91, Government Code. Reference: Section 51, Civil Code, Section 12926(i),(s), Government Code.

Article 2. Petition Process

§ 1002. Geographic Features or Place Names Subject to Petition.

(a) The following persons or entities may Petition to identify an Offensive and Derogatory Geographic Feature or Place Name:

(1) California Native American tribes;

(2) Public Agencies;

(3) Natural persons who can establish residency in California at the time of filing a Petition, or natural persons who live outside of California at the time of filing a Petition, but who can demonstrate a personal or legal impact has occurred or will occur as the result of an Offensive or Derogatory name. A personal or legal impact that could result from an Offensive or Derogatory name include, but are not limited to, having or anticipating having a legal residence in a Place with an Offensive or Derogatory mailing address, owning a business or subsidiary with an Offensive or Derogatory mailing address, burying a relative in a District with an Offensive or Derogatory name, or having relatives who have lived in a Place with an Offensive or Derogatory Name;

(4) Legal entities, such as corporations, trusts, and other non-natural persons who have filed a tax return with the California State Franchise Tax Board in the year proceeding the Petition;

(5) Voting member of the Committee during their tenure on the Committee.

(b) Only public Geographic Features or Place Names within the jurisdiction of a Public Agency may be the subject of a Petition consistent with Government Code § 8899.94

(b)(2).

Note: Authority cited: Section 1(c), Government Code. Reference: Sections 8899.91 (b), Government Code.

§ 1003. Required Contents of a Petition.

(a) All Petitions to identify an Offensive and Derogatory Geographic Feature or Place Name shall include:

- (1) Name and contact information of the Petitioner.
 - i. Contact information shall include an electronic mail address and phone number.
 - ii. An electronic mail that is returned or an electronic mail address not functioning may delay the processing of the petition or may result in denial of the petition.
- (2) The current name of the Geographic Feature or Place Name being proposed as Offensive and Derogatory.
- (3) Location of the Geographic Feature or Place Name, including a map and the latitude and longitude that clearly identifies the location of the Geographic Feature or Place.
- (4) A list of all Public Agencies with jurisdiction over the Geographic Feature or Place Name if known to Petitioner, or if unknown a statement identifying that Petitioner is not aware of the public entities with specific jurisdiction.
- (5) Relevant history of the Geographic Feature or Place Name, including citations and supporting documentation of the relevant history. Relevant history may include history of the origin of the current name, meaning of the name, how long the name has been in use, and the historical significance of the name.
- (6) Self-attestation under penalty of perjury that the Petitioner meets the requirements under Section 1002 (a).
- (7) Justification why the Geographic Feature or Place Name is Offensive and Derogatory as defined in Section 1001.
- (8) Engagement that has been done to date by the Petitioner with potentially affected Public Agencies, entities, tribes and members of the public.

(9) Other narrative explanation from Petitioner about the basis of the Petition.

(b) All submitted documentation shall be legible.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1004. Submission of a Petition.

(a) Petitioners shall provide all information requested in Section 1003 for the Petition to be considered complete. Failure to provide the information may delay the processing of the Petition or may result in denial of the Petition.

(b) Petitions shall be submitted electronically to the Committee as indicated on the California Natural Resources Agency's website.

(c) A Notice of Receipt of the Petition will be sent to the Petitioner through the contact information provided in the Petition.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1005. Committee Staff Petition Evaluation.

(a) A Petition may be rejected on the following bases, including but not limited to:

(1) Illegible documentation.

(2) Required information as stated in Section 1003 has not been provided.

(3) Invalid email address or contact information.

(4) Petition requests the Committee change the names of private places or private geographic features, including but not limited to private roads, private businesses, or private signs not under any Public Agency jurisdiction.

(5) Petition requests the Committee change the names of Geographic Features or Place Names solely within the authority of the federal government.

(b) Committee staff will notify the Petitioner through electronic mail if a Petition is incomplete or if there are any deficiencies in the Petition or information provided.

(1) The Petitioner shall provide the requested corrections and additional information to Committee staff within 30 calendar days of the notification, or the Petition may be rejected.

- (c) Committee staff or Committee members shall conduct tribal consultations regarding all completed Petitions as consistent with the Agency's Tribal Consultation Policy.
- (d) Committee staff or Committee members shall consult with the responsible and affected Public Agencies on completed Petitions.
- (e) After completing consultations, Committee staff will send its recommendation and information on how to participate in the public CACGN meeting where the Committee will review the Petition to the Petitioner, potentially effected California Native American tribes, and the Responsible Public Agency.

Note: Authority cited: Sections 8899.90 (b), Government Code. Reference: Sections 8899.94 (a)(2), Government Code.

§ 1006. Committee Consideration of Petitions

- (a) Committee staff shall present a list of completed Petitions to the Committee during a public meeting.
- (b) The Committee shall consider the following criteria to determine approval or disapproval of a Petition:
 - (1) The Geographic Feature or Place Name meets the definition of Offensive and Derogatory as stated in Section 1001.
 - (2) Petition meets the standards for accepted Petitions as stated in Sections 1002, 1003 and 1004 of these regulations.
- (c) After hearing from Committee staff, the Petitioner, the Responsible Public Agencies, California Native American tribes, and the public, the Committee shall make a finding as to whether a reasonable person would find the Geographic Feature or Place Name Offensive and Derogatory. If a majority of the Committee finds that the Geographic Feature or Place Name is Offensive and Derogatory, it shall proceed to subpart (d) of this Section. If a majority of the Committee do not find that the Geographic Feature or Place Name is Offensive and Derogatory, the Committee shall reject the Petition.
- (d) The Committee or Committee staff shall subsequently transmit the results of the Committee vote, finding a Geographic Feature or Place Name to be Offensive and Derogatory, to the Secretary of the Natural Resources Agency. The Secretary shall have 30 days to concur with the

Committee or independently reject the Petition. If the Secretary takes no action after 30 days, the Petition shall be deemed accepted.

- (e) Upon the Committee's vote and Secretary's approval of a determination of a Geographic Feature or Place Name as Offensive and Derogatory, Committee staff shall send to the Petitioner and Responsible Public Agency a Notice of Determination.

Note: Authority cited: Section 8899.90, Government Code. Reference: Sections Section 8899.90, Government Code.

Article 3. Identification of Same or Similar Determined Offensive and Derogatory Names

§ 1007. Process for Identifying Same or Similar Determined Offensive and Derogatory Names

- (a) Geographic Features or Place Names identified and approved as Offensive and Derogatory through the Petition process identified in Sections 1002 through 1006 above shall be considered for potential duplicity throughout the State.
- (b) The Committee shall solicit input from members of the public, California Native American tribes, and Public Agencies regarding other same or similar names located in California and under Public Agency jurisdiction for a period of 120 calendar days.
- (1) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must come from a person or entity as consistent with Section 1002.
- (2) Submittals for same or similar Offensive and Derogatory Geographic Features or Place Names must also include the same information required in Section 1003(a)(1)-(4) and shall be submitted using the same means as those identified in Section 1004.
- (c) Upon receipt of a submittal for a same or similar Offensive and Derogatory Geographic Feature or Place Name, Committee staff shall send a notice of receipt.
- (d) After the 120 calendar day solicitation period has passed, Committee staff shall notify and coordinate with Responsible Public Agencies to identify and approve replacement names following the process as stated in Article 4.

Article 4. Process for Identifying and Approving Replacement Names

§ 1008. Identifying Replacement Names for Approved Offensive and Derogatory Geographic Features or Place Names

- (a) Committee staff or Committee members shall conduct tribal consultations regarding all approved Petitions as consistent with the Agency’s Tribal Consultation Policy. Committee staff or Committee members shall notify and coordinate with Responsible Public Agencies as well as potentially affected state agencies to identify replacement names for approved Offensive and Derogatory Geographic Features or Place Names.
- (1) Upon such notice, the Responsible Public Agency shall propose at least one replacement name to the Committee within 180 calendar days of receiving the Notice of Determination by the Committee.
- i. Replacement names shall adhere to the criteria identified in Section 1009.
 - ii. The responsible Public Agency shall consult with potentially effected California Native American tribes to solicit replacement name proposals.
 - iii. The responsible Public Agency shall provide guidance on pronunciation and meaning of proposed replacement names.
- (2) If replacement names are not provided by the Public Agency within the 180 calendar days, or the replacement names are deemed to be Offensive and Derogatory by the Committee using the criteria listed in Section 1001 (g), the Committee shall solicit replacement names and input from the following:
- i. California Native American tribes,
 - ii. Appropriate Public Agencies, and
 - iii. Members of the public.
- (b) The Committee shall review and approve or reject replacement names in accordance with the criteria stated in §1009.
- (c) The Committee shall provide an opportunity for the public to provide comments during a public meeting for which replacement names for the Offensive and Derogatory Geographic Feature or Place Name are being considered.

- (d) After review and public comment, the Committee shall vote on a recommendation of proposed replacement names. The Committee or Committee staff shall subsequently transmit the results of the Committee vote, recommending one or more replacement names, to the Secretary of the Natural Resources Agency. The Secretary shall have 30 days to concur with the Committee or independently reject the recommended replacement names. If the Secretary takes no action after 30 days, the replacement name(s) shall be deemed accepted.
- (e) Upon the Committee's vote and Secretary's approval of a replacement name for an Offensive and Derogatory Geographic Feature or Place Name, the Committee or Committee staff shall notify the Responsible Public Agency.
- (f) The Responsible Public Agency shall formally adopt an approved replacement name within 365 days of Committee communication of the decision in Section 1008(f).
- (1) Extensions may be granted by the Committee upon request for reasonable cause. Reasonable cause may include, but is not limited to, natural disasters, established name change processes that require longer periods, or other causes outside a Responsible Public Agency's control.
- (g) Responsible Public Agencies shall coordinate with emergency response, mapping entities, and any additional departmental entities, as appropriate, to reflect the approved name changes in maps, signs, interpretive markers, and databases where the Geographic Feature or Place Name is recorded.
- (1) Additional information on coordinating with the entities mentioned in section 1008(h) is available on the California Natural Resources Agency's website.

Note: Authority cited: Section 8899.90 (b), Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1009. Criteria for Approving a Replacement Name

- (a) When selecting replacement names, the Committee shall prioritize:
- (1) Names that do not refer to a specific person.
- (2) Names that honor and recognize California Native American tribes, tribal culture, and indigenous languages specific to the geographic region in question, including place names that were previously used by California Native American tribes.

(b) The Committee shall consider input received from California Native American tribes, Public Agencies, and affected members of the public.

(c) The replacement name shall not be Offensive or Derogatory as stated in Section 1001.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1010. Public Name Changes Independent of Petition Process

(a) Nothing in this Division is intended to prevent Public Agencies from independently adopting, modifying, or changing Geographic Features or Place Names under their jurisdiction that are consistent with existing law as well as the regulations in this Article.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

§ 1011. Committee Record, Findings, and Decision

(a) Once the Committee and Secretary have made a decision to reject or accept a Petition or replacement name, no further deliberations are needed by the Committee on the Geographic Features or Place Names in question.

(b) Final decisions on replacement names shall be recorded and made available to the public.

Note: Authority cited: Section 8899.95, Government Code. Reference: Sections Section 8899.95, Government Code.

§ 1012. Appeals to the Secretary

(a) Petitioners can appeal rejected Petitions and all recommended replacement names to the Secretary.

(b) The Committee has the discretion to determine if a rejected Petition should be reviewed again for completeness.

Note: Authority cited: Section 8899.94, Government Code. Reference: Sections Section 8899.94, Government Code.

Article 5. Public Comment

§ 1013. Right to Comment.

(a) Any persons or entities stated in Section 1002(a) may submit written or oral comments relevant to a proposed Petition or renaming proposal to the Agency.

Note: Authority cited: Section 8899.92, Government Code. Reference: Sections Section 8899.94 (2), Government Code.

Article 6. Remedies and Enforcement

§ 1014.

(a) Once a Public Geographic Feature or Place Name has been deemed Offensive and Derogatory by the Committee and approved by the Secretary of the Natural Resources Agency, a Public Agency shall no longer replace any sign, interpretative marker, or any other marker or printed material with the discontinued name.

(b) The Committee shall issue a notice of non-compliance for any failure by a Responsible Public Agency to replace a newly instated signs, markers, or other public insignia within 90 days of receiving a notice for non-compliance. The Committee shall seek any remedy and take any enforcement action available to it by law for any of the following, including, but not limited to:

- a. Failure of a Responsible Public Agency to comply with a final name-change decision falling under these regulations, or
- b. Maintenance of signs or other markers in contravention of a final name change decision or maintenance of signs or markers that otherwise retain an Offensive and Derogatory name in a space over which a Public Agency has direct jurisdiction or ownership.

Note: Authority cited: Section 1, and 8899.93, Government Code. Reference: Sections Section 8899.93 (a), Government Code.