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CLIMBING THE LADDER TO PARK HEAVEN

Rolf Diamant

Earlier this year I received a flood of news articles about New River Gorge on my Google homepage.

- Explore New River Gorge, America's Newest National Park (*Backpacker*)
- West Virginia's New River Gorge Is The Country's Newest National Park (*WBUR*)
- Everything You Need to Know About New River Gorge, America's 63rd National Park (*Vogue.com*)
- Meet New River Gorge, West Virginia's First National Park (*AARP*)
- Our Newest National Park—and West Virginia's First—Is Fantastic for Birding (*Audubon*)

And what exactly generated all these enthusiastic headlines? You couldn't blame the average person for assuming New River National Park and Preserve was a brand new addition to the US national park system. In fact, all this publicity was about a name change. Congress recently decided that *New River Gorge National River*, managed by the National Park Service (NPS) since its establishment in 1978, will now be called *New River Gorge National Park and Preserve*. Spearheaded by West Virginia's congressional delegation, the redesignation was tucked into the Consolidated Appropriations Act for Fiscal 2021. This name change placed New River in an elite cohort of the only 63 NPS areas that carry the words "national park" in their formal title out of a much larger park system of 423 areas. Depending how one counts,

ABOVE Grandview, New River Gorge National Park and Preserve, West Virginia | LEAH PERKOWSKI-SISK / NATIONAL PARK SERVICE

there are dozens of other names for NPS areas, such as national seashores, national historic sites, national monuments, national battlefield parks, national lakeshores, national memorials, national recreation areas, national historical parks, national parkways etc. If you choose to look a little closer at this rechristening of New River, you will discover that the new "national park" component of the park is actually under 8,000 acres, only about 10% of its 70,000 acre total. The 8,000-acre enclave, at first glance, seems rather modest given NPS's own description of a "national park" as generally containing "a variety of resources" and encompassing "large land or water areas to help provide adequate protection of the resources."[1] The other 90% of New River is within the "preserve" (where hunting is still allowed.)[2] Regardless of the diminutive size of the actual national park designation, regional civic and business boosters were ecstatic with the reclassification. As one proudly proclaimed, by having the words

Screenshot from the *New York Times*, February 16, 2021

Meet America's 63rd National Park

The New River Gorge in West Virginia got the federal government's highest protection, thanks, in part, to the latest pandemic relief bill.

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Kayakers enjoy calm waters under the New River Gorge Bridge. Tony Cenicola/The New York Times

"national park" featured in the new name, "we have now gone from the minor leagues to the majors."[3]

Honestly, you've got to hand it to West Virginia's travel and tourism marketing people for making the most of this arguably semantical exercise: they certainly raised the public relations bar for all redesignations still waiting in the wings. And there are likely quite a few, judging from recent trends. I was vaguely aware that two NPS areas near where I live, Saint-Gaudens and Weir Farm National Historic Sites, had been recently retitled by Congress as "national historical parks." However, when I began to look more closely at this phenomenon nationwide, I was surprised by the extent of renaming activity. In fact, over the last 20 years Congress has reclassified approximately two dozen NPS areas. Here is a partial accounting of what I discovered.

Cuyahoga Valley led the way in 2000, changing from "national recreation area" to "national park." Since then White Sands, Indiana Dunes, Congaree, Pinnacles, Gateway Arch, and now New River Gorge have followed suit, transitioning away from original designations that included "national lakeshore," "national memorial," and "national monument" to the much coveted title of "national park." But the real push to upgrade has occurred with predominantly cultural areas, former "national historic sites" and "national monuments," that were renamed "national historical parks," including Jimmy Carter, Thomas Edison, Abraham Lincoln Birthplace, Weir Farm, Golden Spike, Reconstruction Era, Fort Sumter, Palo Alto Battlefield, Ocmulgee Mounds, Martin Luther King, Jr., Saint-Gaudens, and Homestead. I assume the thinking among this cohort is that at least getting the word "park" into your name is close enough to heaven.

Occasionally, the suggestion of a name change has generated some heat. A concerted effort to retitle Golden Gate National Recreation Area as a national park was abandoned in part due to a vocal campaign waged by dog owners who erroneously believed the conversion was a ruse by park administrators seeking to tighten canine restrictions in the park.[4] At nearby Point Reyes National Seashore, pro-elk activists, unhappy with an NPS plan for the seashore's historic agricultural districts that they believed favored grazing livestock over elk, have taken to referring to Point Reyes as a "national park" rather than a "national seashore." This deliberate misidentification is intended, I think, to pressure NPS into demonstrating greater fidelity to the "unimpaired" language of the 1916 NPS Organic Act. However, like the complex ecosystem of park names, there is a broad universe of congressionally passed legislation relating to the national park system. An exclusive fixation on the 1916 NPS Organic Act, or for that matter, any individual park's original enabling act, willfully overlooks the approximately 75 other laws and their requirements relating to the management policies of the National Park Service. This includes everything from the Endangered Species Act to the National Historic Preservation Act, from the Wilderness Act to the Native American Graves Protection and Repatriation Act, from the National Environmental Policy Act to the Historic Sites Act. Park titles are important, but they are perhaps not invested with as much statutory significance as people might believe.

In fairness, sometimes NPS is itself guilty of cutting corners when it comes to names. When I was superintendent of Marsh-Billings-Rockefeller National Historical Park (MBRNHP) we watched with great sympathy as visitors and other members of the public struggled with a park name that stretched out like a longevity noodle. It didn't help that the park was constantly being confused with its neighboring private partner organization that also had "Billings" in its name. As an informal remedy, staff simply began referring to MBRNHP as "the national park." It helped that there were no other national parks in Vermont (not counting the Appalachian National Scenic Trail, also a unit of the national park system.) This unofficial fix seemed to work fine, and after a few years, without the need for any congressional intervention, nearly everyone—most importantly media, constituents, and partners—was referring to MBRNHP as "the national park."

Taking a step back, is it worth asking if all this renaming is worth paying attention to, and if so, what are the intended, as well as unintended, consequences

In this montage, the National Park Foundation used blended photos to suggest the diversity of the national park system.

of these shifts in classification for the future of the national park system. I've decided to use this 25th Letter from Woodstock to look at this question. This is not my first encounter with this issue from a policy perspective; while working for NPS I tried to simplify and reduce the official list of 30–40 types of park designations.[5] In 2009, Jon Jarvis and I were involved with the National Parks Second Century Commission

when it recommended that Congress enhance "brand recognition and promote public awareness that all units are part of the same system, by substantially reducing the more than two dozen different park titles currently used."[6]

A year later, Jarvis, then the director of NPS, had his staff draft legislation for a number of NPS reforms. One of them would have consolidated park designations into a handful of classifications, including "national park," "national historical park," and "national monument." They were in the process of lining up a congressional sponsor when they encountered stiff headwinds. First, there was the Deepwater Horizon oil spill that totally absorbed everyone's attention, followed by mid-term elections that gave the Republicans control of Congress. The draft park bill was quietly dropped.

The subject, however, was briefly revived in the run-up to the 2016 NPS Centennial when a Centennial Essay Series on the future of the national park system appeared in the pages of *The George Wright Forum*, precursor to *Parks Stewardship Forum*. George Wright Society Executive Director Dave Harmon's essay, "Beyond the 59th Park: Reforming the Nomenclature of the US National Park System," described the universe of park designations employed by Congress and used the occasion of the Centennial to appeal for a more cognitive presentation of the system to the public. "It stokes the confusion, already widespread, over what the purpose of the national park system is," Harmon wrote, "and how its [at that time] nearly 400 … components relate to one another."[7] In a capstone essay summarizing the Centennial series that I wrote with former NPS Chief Historian Dwight Pitcaithley, we basically agreed with Harmon's assessment, asserting that this stubborn taxonomy "subtly re-enforces a balkanization that detracts from one of the inherent strengths of a system: clear brand recognition."[8]

Now retired from NPS and studying the history of national parks as my academic vocation, I find that my opinion on this question is more nuanced. My thinking was influenced in part by a provocative article "Reservations of Like Character" written by attorney Garret Rose and published in the February 2017 issue of the *Penn State Law Review*. In his essay, Rose acknowledged the way current names can fragment public perception of NPS and creates an implied valuation associated with different designations. "Units that bear the same titles as those that are appended to the so-called 'crown jewels' (Grand Canyon, Yellowstone, and so on)," Rose pointed out, "will be seen as 'better' than units that bear titles associated with 'lesser' park units."[9] On the other hand, Rose described how the variety of naming options provided Congress and NPS more flexibility in experimenting with new types of protected areas and ultimately stretching the national park system in new directions:

> If the System were limited to one "national park" category, it is less likely that we would have added many of the urban park units, standalone rivers and trails, or some of the smaller, more discrete historic sites (to choose a few examples). As new classifications were made in the 1930s and beyond … we see a corresponding growth of units from new areas previously underrepresented in the park system (such as urban areas).… In an important way then, the proliferation of classifications appears to have aided and abetted the addition of sites to the System that fall outside the classic national park paradigm.[10]

This perspective aligned with a 2015 Congressional Research Service report[11] that conceded more uniform branding might make some park areas "more recognizable as part of the park system … bring more visitors to under recognized units and thus help businesses in surrounding communities." But that such a move might unintentionally become a barrier to the future development of the system and that the "current, more loosely structured system maximizes Congress's flexibility to title units to reflect their unique features."

In a recent conversation with a close friend who is also an NPS veteran, I brought up the current trend in Congress to amend original legislative designations. I wondered aloud if someday we might not regret this slow but steady move towards homogeneity. "I don't

think so," my friend responded, pointing out "this arcane system of names is set up to perpetuate a clear distinction, a barrier, between a first class of larger natural parks, and a second class made of all the other areas—primarily cultural parks." But there are cases, I suggested, when the names are helpfully descriptive, like "national seashore" or "national military battlefield." Referring to the *Penn State Law Review* article, I shared what I believed is the ultimate argument for keeping the old names: that it helps perpetuate the breadth and diversity of the national park system. As Rose had written, "far from simply providing mere description, the hierarchy acts as a repository for the different pieces of American culture's complicated—and sometimes contradictory— relationship with its heritage." "That is true," my friend replied, "but the problem remains that such hierarchy, and its implied inequality, creates an incentive to move up in the system. People look for a ladder, and if they find one they will try to climb it."

Since I began my career with NPS 45 years ago, more than 125 new areas have been added to the national park system—vastly increasing the system's acreage, geographic and demographic reach, representation, and thematic content. I am still annoyed when a less-than-rigorous reporter files a misleading news story about someone visiting all national parks—that is, only the 63 formally called a national park rather than the full 423 parks (and counting) that comprise the entire system. But perhaps consolidating park names is not the only solution to correcting this myopic perception. Hopefully, old stereotypes will gradually be discarded as more people actually experience for themselves the myriad of extraordinary places and stories contained in our ever-expanding 21st-century national park system.

So I have ended up now believing that the benefits of keeping the inexact, heirloom hierarchy of park names—more or less intact—outweigh the costs of change. I am frankly more concerned with congressional acquiescence in incrementally changing park titles, often, as in the case of New River, as discreet amendments to larger bills. In conducting business in this fashion Congress sidesteps meaningful consideration of long-term policy implications. Undertaking a long overdue examination of the efficacy and usefulness of past naming practices would be an ideal assignment for the National Park System Advisory Board when it is reconstituted and intellectually recharged by Deb Haaland, the new secretary of the interior. The old board under her predecessor was unfortunately more or less relegated to reviewing landmark nominations. The board's engagement here would hopefully encourage NPS and Congress to be more intentional and proactive than in the past. I realize this issue may lack the immediacy of other priorities, but deferring action will have its consequences as Congress steadily chips away at the standing nomenclature—one national park at a time.

Endnotes

1. National Park Service, *The National Parks Index 1916–2016* (Washington, DC: US Government Printing Office (2016), 9.
2. Current federal law prohibits hunting on all national park lands unless specified by statute. The much larger preserve placated the interests of the relatively sizeable community of West Virginia hunters and sportsmen. Calling it "New River Preserve and National Park" might have made more sense, but that would have missed the point of the whole re-branding effort.
3. Cheryl Keenan, "National Park Designation Moves Area 'from the minor leagues to the majors,'" *The Register-Herald* [Beckley, WV], February 26 (2021).
4. All national park areas adhere to the same set of management guidelines with exceptions only made by statute.
5. For a complete listing see David Harmon, "Beyond the 59th Park: Reforming the Nomenclature of the US National Park System," *The George Wright Forum* 29(2): 189 (2012). http://www.georgewright.org/292harmon.pdf
6. National Parks and Conservation Association, *Advancing the National Park Idea: National Parks Second Century Commission Report* (Washington, DC: National Parks Conservation Association, 2009), 43. https://www.npca. There are at least 19 principal classifications: National Battlefield, National Battlefield Park, National Military Park, National Battlefield Site, National Historical Park, National Historic Site, International Historic Site, National Lakeshore, National Memorial, National Monument, National Park, National Parkway, National Preserve, National Reserve, National Recreation Area, National River, National Wild and Scenic River and Riverway, National Scenic Trail, and National Seashore. https://www.npca.org/resources/1900-national-parks-second-century-commission-report
7. Harmon, "Beyond the 59th Park," 189.
8. Dwight Pitcaithley and Rolf Diamant, "Final Centennial Thoughts," *The George Wright Forum*, 33(3): 263 (2016). http://www.georgewright.org/333pitcaithley.pdf
9. Garett R. Rose, "'Reservations of Like Character'—The Origins and Benefits of the National Park System's Classification Hierarchy," *Penn State Law Review* 121(2): 359 (2017). http://www.pennstatelawreview.org/wp-content/uploads/2017/02/Article-2.2-v.-2-Rose-1.pdf
10. Ibid., 395–396.
11. Laura B. Comay, *National Park System: What Do the Different Park Titles Signify?* Washington, DC: Congressional Research Service, 2013. https://fas.org/sgp/crs/misc/R41816.pdf

The views expressed in editorial columns published in Parks Stewardship Forum are those of the authors and do not necessarily reflect the official positions of the University of California, the Institute for Parks, People, and Biodiversity, or the George Wright Society.

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On the cover of this issue

A montage of images from One Tam, a collaborative partnership to manage the landscape of Mount Tamalpais in California, along with one from Alcatraz Island in Golden Gate National Recreation Area.

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