

## Beyond the 59th Park: Reforming the Nomenclature of the US National Park System

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HAVE YOU EVER BEEN TO PINNACLES? Tucked away in California's Coast Ranges south of San Francisco, it's one of the many hidden gems of the national park system. I have, twice. Approaching it from the west, as I did the first time I went, out of the little town of Soledad you follow a winding road that dead ends at the park. If you get up early enough on a gentle spring morning, you arrive to an expanse of chaparral filled with diffused, soft light from the sun rising behind the Gabilan Range. The second time, I came in from the east—no road crosses the park—on a typically scorching summer afternoon. The aspect was harsher, and my hike up to Bear Gulch Reservoir much hotter, but it was still beautiful. Since I last went, Pinnacles has achieved considerable notoriety by embarking on a condor reintroduction program, adding even more interest to the prospect of a visit there.

So, when I came across a news story on the Web in July about current efforts to get Pinnacles redesignated from a National Monument to a National Park, I took notice. The story, which appeared in a local newspaper, led with a paragraph simply noting that the legislation had passed a key House committee. Then the staff writer explained the significance of what had happened: “The House Natural Resources Committee unanimously approved of the legislation sponsored by Rep. Sam Farr, D-Carmel, and co-sponsored by Rep. Jeff Denham, R-Modesto, to make Pinnacles National Monument the 59th park in the National Park System.”<sup>1</sup>

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“The 59th park in the National Park System.” If you truly care about the system in its entirety, those words ought to go right to the pit of your stomach. Not because Pinnacles isn’t worth “full national park status” (a phrase frequently used). No, when you hear talk like this you should feel queasy because it stokes the confusion, already widespread, over what the purpose of the national park system is and how its nearly 400 components relate to one another. It reinforces the idea that the system consists of 58 places of value—the places termed National Park—while consigning the other 339 units to, at best, a distant second-class status.

In fact, it states in disarmingly simple language what all of us park-savvy sophisticates deny in our mouths but know, in our hearts, to be true: we do not have a national park system, but a national park caste system. And that caste system is in no small part rooted in the bewildering variety of park designations—at least two dozen in addition to National Park and National Monument—that has been allowed to accrue over the decades.

Make no mistake: the nomenclature of the national park system is a national disgrace. It is a parade of distinctions without a difference. It is a towering tower of bureaucratic babble. It is by turns oversubtle and underinformative. Most damningly, it is unintelligible to the average person and expert alike. If the parks are “America’s best idea,” as is so often claimed, then the fact that we have so many meaningless categories for them is America’s worst one.

I have gathered the evidence in Table 1. Take a deep breath, and then dive in.

**Table 1.** Designations of units of the national park system. The list doesn’t include designations such as National Heritage Area, National Historic Trail, etc., that are used for places affiliated with NPS but not part of the national park system.

1. National Battlefield	21. National Scenic River
2. National Battlefield Park	22. National Scenic Riverway
3. National Battlefield Site	23. National Scenic Riverways
4. National Historical Park	24. National Scenic Trail
5. National Historical Park and Ecological Preserve	25. National Seashore
6. National Historical Reserve	26. Ecological and Historic Preserve
7. National Historic Site	27. Gardens
8. National Lakeshore	28. House
9. National Memorial	29. International Historic Site
10. National Military Park	30. Island
11. National Monument	31. Mall
12. National Monument and Historic Shrine	32. Memorial
13. National Monument of America	33. Memorial Grove
14. National Park	34. Memorial Parkway
15. National Preserve	35. Park
16. National Recreation Area	36. Parks
17. National Recreational River	37. Parkway
18. National Reserve	38. Scenic and Recreational River
19. National River	39. Wild and Scenic River
20. National River and Recreation Area	40. Wild River

Now usually, when people tally the number of designations in the national park system, they come up with a number such as 25 or 30 or thereabouts. As you can see, I found 40. Have I overcounted? Should I have included “Island” (as in Theodore Roosevelt Island), “Mall” (as in the National Mall), or “House” (as in The White House)? Are all the “River” designations just variations on a theme, or are they truly separate? These are all valid questions, to which I would add one more: Who cares? What we have here is the terminological equivalent of kudzu. And, like kudzu, it adds nothing of value to the landscape.

As you scan the list of 40 unique appellations, ask yourself what this would mean if you were running America’s national parks like a no-nonsense business. Would you, as owner, direct your marketing department to come up with 40 different brand names for your one principal product? Oh well, you may reply, some of these brands are useful because they appeal to a particular market segment. War buffs, for example, are empowered to skip right past the Olympics and Yosemite and head on over to the National Military Parks. And if for some reason “Military” is not graphic enough for them, they can go instead to a National Battlefield Park, which tells you straight up that this is a place that saw some serious fighting. Or, if they are put off by the picnic-y associations of the word “park,” they can dispense with the NBP and go to a National Battlefield Site. And if *that* is not terse enough for your strong, silent types, they can cut to the chase at a National Battlefield. Someday, perhaps, if we continue this run of luck, the überbuffs who want All of the Above will be able to satisfy themselves at a National Military Battlefield Parksite.

How is the proliferation officially explained? NPS’s webpage on park nomenclature<sup>2</sup> begins with the bland observation that “the diversity of the parks is reflected in the variety of titles given to them.” It then goes through some of the designations and briefly explains the differences. Significantly, many of the explanations are qualified because there frequently are exceptions to the differences. Here, as an example, is the explanation of National Memorial, with the fudge words highlighted:

The title national memorial is *most often* used for areas that are *primarily* commemorative. They *need not be* sites or structures historically associated with their subjects. For example, the home of Abraham Lincoln in Springfield, Ill., is a national historic site, but the Lincoln Memorial in the District of Columbia is a national memorial.

If you go down the list of national memorials alphabetically, the prescience of all this hedging is justified right off the bat, because the first one you come to, Arkansas Post, doesn’t commemorate anyone or anything specific. Rather, it is emblematic of the “long struggle between France, Spain, and England for dominance of the Mississippi River Valley.”

The difference between a national park and a national monument? There is one, and it is telling (again, italics added):

*Generally*, a national park contains a variety of resources and encompasses large land or water areas to help provide adequate protection of the resources.

A national monument is *intended* to preserve at least one nationally significant resource. It is *usually* smaller than a national park and lacks its diversity of attractions.

Can we blame anyone who reads this official explanation and draws the conclusion that national parks, being larger and more diverse, are therefore more interesting, more attractive, more *valuable* than national monuments? I don't see how, because it is a perfectly logical conclusion. So, returning again to the example of Pinnacles, we should actually not be too critical of the writer who spoke of the "59th park."

Yet even if we are willing to take the official distinction between national park and national monument at face value, and accept that the two terms are far from airtight, when we get down to making comparisons on the ground the exceptions to the rules are so glaring that it calls into question the validity of the whole exercise. For instance, Dinosaur National Monument is large and contains a fascinating variety of resources: the world-famous fossil quarry, the canyons of the Green and Yampa rivers, and more than 1,000 native species. By contrast, Hot Springs National Park is small in extent and its natural resources are heavily influenced by the adjacent city of the same name. Should we conclude, therefore, that (a) the two are misnamed, and (b) that Dinosaur is worth more than Hot Springs?

The designation National Monument is further complicated by its association with the Antiquities Act. All areas protected by means of presidential proclamation under the act are automatically named National Monument. But Congress can also create new parks with that very same designation. What is the difference? Administratively, there is none. But in terms of public perception, there is a strong current of expectation that goes with at least some Antiquities Act-designated national monuments. Those that are large natural areas are viewed as something like national parks with training wheels: at some indefinable point in their maturity, they will be deemed worthy of "graduating" to that ultimate status.<sup>3</sup> Black Canyon of the Gunnison, Death Valley, and Joshua Tree are three recent examples out of many. Yet Dinosaur, proclaimed by Woodrow Wilson in 1915, is, for some inscrutable reason, "stuck" (another loaded word) in national monument status.

And who, outside of insiders, can parse the difference between a national historic site and a national historical park? To the nomenclature page again we go:

National historical parks are *commonly* areas of greater physical extent and complexity than national historic sites.

So, does this mean national historical parks are up in first class with the national parks, while national historic sites and national monuments are paying \$7 for a bag of peanuts back in coach? If only William Howard Taft NHS had a bigger lawn, would it qualify as an NHP? Will the ranger at Colonial roll her eyes at me in disgust if I blunder and refer to it as a "national historic park"?

Now, I am certain none of this is what the National Park Service means to imply; indeed, it dutifully maintains that the collection of 397 park units is a system, and a system of equals. But by common acclamation—which NPS and some park advocates do little or nothing to play down—there *are* class distinctions. The lion's share of money, the *crème-de-la-crème* of field personnel, and the bulk of public attention tend to flow to the Brahmins of this *de facto* caste system, the so-called Crown Jewels: the big, old-line National Parks of the West. Yes, there are some exceptions, but here we might well paraphrase George Orwell: "All parks are

equal, but some parks are more equal than others.” And we could, if we wished, enter into a further convoluted discussion of the unique cachet accorded the centerpiece of this purported diadem: Yellowstone, the Mother Park.

Equating the designation National Park with the most valuable units of the system—or with the *only* valuable units of the system—is a practice at least as old as the National Park Service itself. Its traces include various editions of *The National Parks Portfolio*, one of NPS’s first and most effective public relations publications, in which most national parks were described and illustrated extensively while the national monuments were treated much more perfunctorily; and the proposal in the 1930s for a “national primeval park system” that would encompass only large natural areas, excluding the historic sites and recreation areas then being added to the system, which were deemed “a welter of miscellaneous reservations.”<sup>4</sup>

It is a practice that plays itself out over and over even today: in legislative bids like that being pushed at Pinnacles, in guidebooks, and in other popular media. Even Ken Burns and Dayton Duncan, first-class filmmakers who are fully conversant with and appreciative of the diversity and subtleties of the national park system, felt that their documentary’s story was best told by mostly leaving out the 85% of the system that is not called a National Park. Indeed, there are still NPS employees—though a dwindling number, I am told—who think in terms of first- and second-tier areas, and are convinced that a successful career must include tours of duty in the former.

Equally pointedly, there is no evidence that the national park system has been assembled at all systematically. That is hardly surprising, since the nomenclature was created by successive acts of Congress in the most ad hoc manner one can imagine: namely, by successive acts of Congress. Now, of course there is always some untidiness attendant to the legislative process in a democracy, but in their park-making lawmakers have truly been profligate in coining new designations, and for no discernible good reason. To say that Congress “created a system” of park names is to impute far too much intentionality to the process. More properly we should speak of the nomenclature having accreted, in geological fashion, over the years. Now it lies layered, like so many suffocating strata, over the bedrock commonalities of the national parks—commonalities to which we shall return at the end of this essay.

As bad as all this class-mongering is, the nomenclature mess contributes significantly to another problem, alluded to earlier, that has the potential to actually threaten the very survival of the national park system. The problem is that the American people are fundamentally confused about the purposes of our various public land management systems, including that of the national parks. And—critically—because people are not clear about the purposes of public lands, they are also not really clear about what constitutes their respective values, and how to defend those values when they come under attack.

I make these claims based on more than 20 years of having had to explain what I do for a living. In describing what the George Wright Society is, I have to tell people about George Melendez Wright and who he worked for. I have done this hundreds of times, and I can assure you that when I say “Wright was the first scientist who worked for the National Park Service” most people give me a very blank look. I am then compelled to add that “The National Park Service is the federal government agency that is in charge of national parks, like

Yellowstone.” This usually—but by no means always—produces a spark of recognition. Sure, there are plenty of parkies out there, but I am very confident saying that the average American has no clue whatsoever about who the agencies are that run the different protected area systems of our country, let alone being able to distinguish between the missions of those systems. People do not differentiate between national parks and state parks. They certainly can’t tell you the difference between a national park unit (howsoever designated), a national forest, a national wildlife refuge, or a national marine sanctuary.

The public’s lack of understanding of our national land management systems is not just a lamentable state of affairs. It’s pernicious because it creates a dangerous void in the public awareness—an empty space in which people who *do* understand the differences within and among the various systems, and who want to exploit them for their own political purposes, can freely operate.

A perfect example is the Sportsmen’s Heritage Act (HR 4089), which passed the House of Representatives this year before stalling in the Senate. The purpose of the bill is to direct federal land-managing agencies to make it easier to allow hunting and fishing at sites under their jurisdiction. Although most (but not all) national park system units ban hunting, the bill did not exclude the National Park Service from its makeover. The authors tried to make the inclusion of the national park system more palatable by crafting an “exemption” for units designated as National Parks or National Monuments, but the legislation would have applied to the other 264 units not so designated.<sup>5</sup> It is a classic divide-and-conquer strategy that counts on being able to use the complexities of NPS nomenclature to chip away at protections that largely apply to the system as a whole. Luckily, watchdog groups raised the alarm and blocked the bill in the Senate (at least so far).

So much for the problem. What, then, is the solution? The answer was given us many years ago by Henry David Thoreau: Simplify, simplify.

I am certainly not the first to call for streamlining the US national park nomenclature. Just a few years ago, when the National Parks Second Century Commission report was being prepared, one of its preparatory committees explicitly recognized that the designations, for the most part, “do not define any functional difference” and that “this multiplicity complicates public understanding of the defining purpose of national parks as described in law. It should be possible to greatly simplify the terminology and enhance public awareness of the unity of the system.” They recommended cutting the number of designations to no more than five.<sup>6</sup>

That, in my opinion, is four too many. The National Park Service and its allies should draft, and then press Congress to pass, a National Park System Unity Act that redesignates all 397 units as National Parks. It would require that all future additions to the system be designated as National Parks, including those areas added through proclamations made under the Antiquities Act.<sup>7</sup> Finally, expanding upon Congress’ declaration in the General Authorities Act of 1970 that the various park units, “though distinct in character, are united through their interrelated purposes and resources into one national park system as cumulative expressions of a single national heritage,”<sup>8</sup> the National Park System Unity Act would direct NPS to actively interpret to the public each park’s place within the larger national park system, the relationship of that system to its counterparts at the federal and other governmental



levels, and the relationship of all American public lands to those of other countries with whom we share this planet.

Would passing a National Park System Unity Act resolve the public's confusion about land management objectives and purposes? By itself, no, it wouldn't. But it would give us a good start down the road toward a larger national civics lesson about the value of public lands in general.

Nor would reforming the nomenclature, alone, solve the caste problem. Presented with a large, diverse set of entities, people will always make qualitative rankings among them—even if they are all called “National Park.” We should not shy away from this, nor should we allow our exploration of the implications to be hamstrung by fears of being politically incorrect. Does the thought of setting an “Amistad National Park” or a “Maggie L. Walker National Park” alongside “Grand Canyon National Park” give you pause? Then: speak up! By all means let us open a robust conversation about what constitutes “national significance,” for that is actually what the caste problem is all about.<sup>9</sup> But: let the conversation be informed by a conception of national significance that is not presumed to be unitary, static, and self-evident.

As well, let us candidly recognize that while a place like (say) Independence can, in some sense, be considered ultimately more important than a place like (say) Capulin Volcano, both of them are consequential in their own right, both are assets to our natural and cultural heritage, and both are, in different but complementary ways, significant to our nation.

Because that is what it means to be a part of a *national park system*. The “bedrock commonalities” I spoke of above are these: national significance, and unity of care. Once a place is deemed significant enough to be admitted to the national park system, it truly becomes a National Park and should be called by that name and that name only. And, once deemed a National Park, it is worthy of the exact same high level of care and respect as any other National Park. These two commonalities are what put the Independences and Capulins of the world on a par with one another and allow them to be treated as administrative equals within a single system, even though, as Congress has recognized, they are “distinct in character.”

There is a saying, usually identified as being a Chinese proverb, that “the beginning of wisdom is to call things by their right names.” I submit that the wisest course of action is to begin calling every American national park by its right name. It is high time that we go beyond debating which unit should be the “59th park” and extend clarity and unity of naming to all 397. Let us then, in celebration of the Park Service's centennial, finally have a national park system made up exclusively of National Parks.

## Endnotes

1. Anonymous, “Effort to name Pinnacles a national park sent to House,” *Gilroy* (California) *Dispatch*, July 11, 2012. Online at [www.gilroydispatch.com/articles\\_from\\_holliester/effort-to-name-pinnacles-a-national-park-sent-to-house/article\\_53bc49e4-784d-58d4-994e-d11ba10805cd.html](http://www.gilroydispatch.com/articles_from_holliester/effort-to-name-pinnacles-a-national-park-sent-to-house/article_53bc49e4-784d-58d4-994e-d11ba10805cd.html). A *Los Angeles Times* article later in the month repeated essentially the same thing. As this essay goes to press, the bill had passed the House and the Senate nearly passed an identical bill just before its August recess. The issue may be taken up again when Congress reconvenes in September.

2. National Park Service, “Nomenclature of park system areas,” undated. Online at [www.nps.gov/history/history/hisnps/NPSHistory/nomenclature.html](http://www.nps.gov/history/history/hisnps/NPSHistory/nomenclature.html).
3. I am speaking here only of proclaimed monuments assigned to the National Park Service. Numerous national monuments have been proclaimed through the Antiquities Act and placed under the jurisdiction of other agencies.
4. There were many editions of the *Portfolio*, which was authored by Robert Sterling Yard, starting with two published in 1916 just before, and then after, NPS was created. My assessment of the unbalanced treatment is based on the table of contents of the third edition (Washington, DC: Government Printing Office, 1921), 7. For the national primeval park system proposal, see Harlan D. Unrau and G. Frank Williss, *Administrative History: Expansion of the National Park Service in the 1930s* (Denver: Denver Service Center, National Park Service, 1983), chap. 6; Richard West Sellars, *Preserving Nature in the National Parks: A History* (New Haven, CT: Yale University Press, 1997), 142–145. Quotation is from William P. Wharton, “The national primeval parks,” *National Parks Bulletin* 13 (December 1937), cited in Sellars, *Preserving Nature*, 143. Incidentally, in a speech delivered shortly before his untimely death, George Wright expressed opposition to the primeval parks proposal; see Sellars, *Preserving Nature*, 144.
5. Arnold & Porter LLP, “The impact of HR 4089, The ‘Recreational Fishing and Hunting Heritage and Opportunities Act,’ on the national park system,” unpublished report (Washington, DC: Arnold & Porter LLP, 2012). This legal analysis, commissioned by the National Parks Conservation Association, found that the “exemption” offered for national parks and national monuments was subtly worded in such a way that would actually have permitted hunting in those areas, and in fact might have required NPS to go to great lengths to justify *not* allowing hunting. The analysis concluded that the legislation would overturn fundamental NPS wildlife management tenets that have been in place for decades.
6. National Parks Second Century Commission, “Future Shape of the National Park System Committee Report: A system that works for all,” in *Advancing the National Park Idea: National Parks Second Century Commission Committee Reports* (Washington, DC: National Parks Conservation Association, 2009), unpaginated.
7. Some people oppose changes to the nomenclature in general because they are concerned that any change to the designation National Monument might open the door to unwelcome alterations to Antiquities Act. There is some validity to this, but I think a National Park System Unity Act could be carefully written so as to maintain the essential presidential proclamation powers of the Antiquities Act. See also note 3, above.
8. Lary M. Dilsaver, ed., “An Act to Improve the Administration of the National Park System by the Secretary of the Interior, and to Clarify the Authorities Applicable to the System, and for Other Purposes, 1970 (84 Stat. 425)” [i.e., the General Authorities Act], in *America’s National Park System: The Critical Documents* (Lanham, MD: Rowman & Littlefield, 1994), 374.
9. Re-open, actually: the concept has been debated sporadically over the years. For instance, during his time as NPS director (1989–1993), James Ridenour voiced concerns about “the thinning of the blood,” a view he summarized in *The National Parks Com -*



*promised: Pork Barrel Politics and America's Treasures* (Merrillville, IN: ICS, 1994). For a response, see Frank Buono, "Thinning the blood—another myth," *The George Wright Forum* 10:4 (1993), 39–44.

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