



Office of the General Counsel
Maryland-National Capital Park and Planning Commission

Reply To

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Adrian R. Gardner
General Counsel
6611 Kenilworth Avenue, Suite 403
Riverdale, Maryland 20737
(301) 454-1670 • (301) 454-1674 fax

Memorandum

TO: The Montgomery County Planning Board

FROM: Adrian R. Gardner
General Counsel

Kristen O. Maneval
Senior Counsel

RE: Standards for Commemorative Naming of Park Assets

I. POLICY PROPOSAL

The Planning Board should consider and adopt the standards embodied within the amendments to the Montgomery County Park Department's *Individual Naming and Dedication Policy* (the "Naming Policy") set forth in **Attachment A**.

II. BACKGROUND

At various times over the past year, senior managers and commissioners from both counties have inquired about the requirements and best practices for naming park facilities – parks, buildings, fields, rooms, areas, etcetera (generally, "Park Assets") – including on the subject of requests to commemorate individuals with no charitable, philanthropic or commercial sponsorship transaction. As you may be aware, the Montgomery County Planning Board adopted its current Naming Policy in 2011, as part of a broader evaluation of the business process and standards for naming Park Assets. **Attachment B** (the complete Naming Policy for convenient reference).

After taking a fresh look at the Planning Board's existing Naming Policy, this memorandum provides the results of our research, and offers some proposed revisions for consideration by the Planning Board.

Please note that, pursuant to the existing Naming Policy, naming transactions that involve a financial exchange for charitable, philanthropic or commercial sponsorship purposes – including financial deals that may pay tribute to individuals – are covered under a separate marketing arrangement with the Montgomery County Parks Foundation.

Accordingly, those financial charitable, philanthropic and commercial sponsorship naming deals are not revisited in this memorandum or included within the scope of our discussion that follows.

III. LEGAL ENVIRONMENT

The Planning Board's legal authority to name Park Assets inheres within the Commission's statutory authority to acquire and use property for public purposes. *See* Md. Code Ann., Land Use § 17-101(a) and (c) ("The Commission may acquire property... to carry out the Commission's general plan for the physical development of the [park district]" and "controls the maintenance and operation of [such] property"); 10A McQuillin Mun. Corp. § 30:16 (3d ed.) (naming public streets or facilities is an exercise of inherent legislative power "to advance the convenience in locating" them and enhance their usefulness). In this regard, courts would be reluctant to encroach into the agency's quasi-legislative prerogative to determine its means, methods or conventions for naming facilities – even if the exercise of that authority is considered unreasonable in a particular case. *Id.* (citing *Hagerty v. City of Chicago*, 274 Ill. App. 39, 42 (Ill. App. Ct. 1934)).

Unlike the First Amendment (free speech) interests that often arise when public agencies allow expression of commercial content or social messaging, the potential to create constitutional fodder ordinarily is remote where the agency makes an internal decision to erect a monument or designate a public property it owns in honor of an individual. *Pleasant Grove City, Utah v. Summum*, 555 U.S. 460, 129 S. Ct. 1125, 172 L. Ed. 2d 853 (2009) ("[t]he Free Speech Clause restricts government regulation of private speech; it does not regulate government speech."). *Cf. Demmon v. Loudoun Cty. Pub. Sch.*, 279 F. Supp. 2d 689, 691 (E.D. Va. 2003) (school could not exclude religious symbols when buy-a-brick fundraiser sold bricks "inscribed with a personalized message and/or certain symbols"); *accord Tong v. Chicago Park Dist.*, 316 F. Supp. 2d 645, 657 (N.D. Ill. 2004) (park system's adopt-a-brick program could not reject religious inscription after allowing viewpoints such as "best cat ever," "playing should be fun," "peace on earth," "respect nature" and "plenty of grace be to this place"). For these reasons, from a legal perspective, the Planning Board enjoys wide latitude to establish a commemorative naming policy for individuals that it considers to be suitable.

IV. ELEMENTS OF INDIVIDUAL NAMING POLICIES

Building on the research undertaken by the Parks Department during its 2011 policy revision, the Legal Department staff has reviewed a number of naming policies from other jurisdictions, including several that were posted for circulation on the National Recreation and Parks Association online policy message board.

Based on this work, we can discern a handful of key elements or variables that are apparent within the individual naming policies reviewed:

Prohibition or Disfavor of Naming for Individuals	Whether naming for individuals is prohibited or disfavored vis-à-vis other naming conventions (<i>e.g.</i> , neighborhood or other geographical names).
Nature or Object of the Civic Contribution	The extent to which a policy allows naming for civic contributions that are unrelated to the park system or Park Assets (<i>e.g.</i> , leadership in local schools).
Posthumous Eligibility or Timing	The extent to which a policy limits naming to individuals who are deceased at the time of commemoration or have been deceased for a period of time.
Quality of the Individual's Civic Contribution	The extent to which the policy establishes an objective standard or superlative benchmark to qualify the individual's level of civic contribution.

V. DISCUSSION OF ELEMENTS

[A] Individual Naming.

All of the policies identified in our research authorize some form of commemorative naming for individuals. At the same time, a significant number of them also disfavor naming for individuals and make it clear that naming to associate a Park Asset with a neighborhood or significant geographical feature is preferred. For example, the pertinent provision of a policy in Greenville, North Carolina, provides as follows:

Priority in naming parks, facilities and geographic features shall be given to geographical locations, historic significance or geologic features.

Similarly, the comparable policy for Arlington County, Virginia, provides:

County facilities, including buildings and parks, shall generally be named according to the geographical, historical, or ecological relationships in which the site is located. Exceptions may be made in [certain enumerated] circumstances[.]

The policy for Seattle, Washington, indicates:

In naming community centers and other facilities, the committee will give considerable weight to the names that reflect the geographic location that gives identity to the community.

And regulations for the City of Alexandria, Virginia, provide:

City parks, recreation areas and facilities shall generally be named in accordance with geographical, historical or ecological features indigenous to the park site or to the immediate vicinity of the site. Parks, recreation areas and facilities may be named for an individual under the [certain enumerated] conditions[.]

All of the policies for these jurisdictions follow a comparable approach that makes naming Park Assets for individuals an exception and not the rule.

Moreover, in several jurisdictions, names for certain categories of individuals are prohibited or limited. For example, the rules for Dallas, Texas, prohibit naming park facilities after an individual who has been a member of the city council or a city commission within an 18 month period immediately prior to the naming. As another example, the policy for the City of Tucson, Arizona, provides:

No park properties or amenities shall be named after a presently sitting elected official, a presently sitting elected or appointed member of any City of Tucson board, commission, or committee, or a current COT staff member.

In addition, special concerns may surface with proposals to name Park Assets after volunteers or employees. For example, San Diego, California, recently experienced a divisive episode after naming a number of facilities after volunteers. What's in a name? San Diego struggles with naming parks after community volunteers, San Diego Union-Tribune, July 1, 2018, <https://www.sandiegouniontribune.com/news/watchdog/sd-me-park-naming-20180629-story.html> (accessed January 13, 2020). In that case, the process for naming involved a citizen recreation council that named three facilities in honor of local activists. As one resident is quoted to criticize the policy: "There are many ways to recognize and honor [volunteer] work in the community [but we] don't want people sitting on committees ... because they think they're going to have a park named after them."

Similarly, National Park Service policies discourage commemoration in honor of its employees. That guidance provides:

Attempts to commemorate former NPS employees can be especially sensitive. NPS employees must keep in mind that, although we are the paid caretakers of the parks, the parks belong equally to all Americans, and we should not use our positions of influence to bestow favored treatment on selected individuals. Except for rare situations, our options for honoring the memory of NPS friends and co-workers should be the same as those available to persons who are not park employees. Park managers do have the additional option, however, of

establishing a “wall of honor” or a similar commemorative display within the confines of an administrative building or in a similar location frequented by park employees. A display of this sort could both recognize the special contributions of park employees and serve as a focal point for remembering those who have departed.

The Planning Board’s existing Naming Policy authorizes the naming of Park Assets for individuals but does not establish any relative priorities with respect to promoting geographical, historical or other characteristics of the community; nor does the existing policy eliminate elected or other sitting public officials from consideration. The proposed revisions in **Attachment A** address both of these issues.

[B] Nature of Civic Contribution.

While a few of the policies reviewed during our research make no distinction about the nature or object of the civic contributions that might qualify an individual for commemoration, a significant number of them contemplate or require that the individual’s civic efforts be tied directly to the park system or, even to the particular Park Asset involved in the naming.

As one example of a policy that requires a clear nexus, the Seattle policy requires that an individual’s civic contribution produce an impact “to parks, recreation, or culture in the community without which the park/facility may not exist, or in which the individual’s contributions enhanced a program or facility in an extraordinary way.” As an even stronger example, the City of Alexandria policy says:

Parks, recreation areas and facilities may be named for an individual under the following conditions:

- b. In memoriam for an individual who has made a significant contribution to the City of Alexandria park and recreation system. ***
- c. Has made a significant contribution to the protection of natural, cultural, or horticultural resources of the City of Alexandria park and recreation system; or
- d. Has substantially contributed to the advancement of commensurate types of recreational opportunities within the City of Alexandria park system; or

e. Has made a significant contribution to the betterment of a specific park, consistent with the established criteria and standards for the designated park classification.

By contrast, for an example of a somewhat less stringent policy, the Tucson policy indicates:

An individual [may be] recognized for extraordinary accomplishments, contributions to the betterment of the Tucson community, its citizens, TPRD, or the nation, and a connection to the park or amenity in question.

The Planning Board's existing policy does not expressly require a strong nexus to the park system because, among other reasons, it enables commemoration for "an outstanding community leader who made a significant contribution to the county..." Our proposed revisions in **Attachment A** would strengthen this element of the policy.

[C] Posthumous Qualification.

Most of the policies considered in our collection either prohibit or discourage naming Park Assets for individuals who are living. For example, the City of Alexandria policy states: "Parks and Recreation facilities will not normally be named for living persons."

A number of policies go much farther by imposing cooling-off periods that can range from 18 months to five years after the individual's death. As one example, the City of Portland, Oregon, policy provides:

Naming a park and/or recreational facility for an outstanding individual is allowed posthumously (at least 3 years since date of passing), and where that person's significance and good reputation has been accepted in City's, State's and/or Nation's history.

The Arlington County policy indicates:

To Commemorate an Individual's Service: Facilities may be named after an Individual who made significant contributions to Arlington County through participation in community, state, or national service. A facility can be so named five years or more after the individual is deceased.

Similarly, the City of Milwaukee, Wisconsin, follows a policy that enables naming only after the second year from the individual's death, and the National Park Service follows a policy that allows it only after five years. As discussed in the 2006 National Park Service operations manual:

To have the name of an individual or family applied to a geographic feature in a national park is a high honor. The five-year waiting period is intended to allow a “cooling off” period, and to confirm that the individual’s perceived contributions will stand the test of time. During the five-year waiting period, those who wish to honor the memory of a deceased individual should give serious thought to other options, such as establishing a scholarship or charitable fund in the individual’s name, or making a donation to support some aspect of the individual’s educational or recreational interests. If the individual truly made a significant contribution to the park, it might be more appropriate to mention the individual in the context of an informational folder or interpretive exhibit.

Our revision in **Attachment A** would limit naming to posthumous commemoration and interpose a five-year cooling off period.

[D] Quality of Civic Effort.

NPS policy stipulates that individuals will not be commemorated unless “the association between the park and the individual is of *transcendent importance*... or the commemoration is authorized by Congress.” (Emphasis added.) A related NPS policy explains:

To be permanently commemorated in a national park is a high honor, affording a degree of recognition that implies national importance. At the same time, the excessive or inappropriate use of commemorative works—especially commemorative naming—diminishes its value as a tool for recognizing people or events that are truly noteworthy. This situation can also divert attention from the important resources and values that park visitors need to learn about. Therefore, the National Park Service will discourage and curtail the use and proliferation of commemorative works except when ***

Congress has specifically authorized their placement; or there is compelling justification for the recognition, and the commemorative work is the best way to express the association between the park and the person, group, event, or other subject being commemorated.

The local policies we reviewed included a variety of benchmarks that prescribe a particular level or quality of civic engagement to justify a commemorative naming. As indicated above, several of them -- including Alexandria and Greenville -- simply require a demonstration that the individual made a “*significant*” contribution to the park system, community, state or whatever other public interest. Similarly, the policy for Winchester, Virginia, requires that the civic contribution be “*lasting and significant*.” In the policy cited above for Tucson, the individual’s contribution must attain the relatively higher level of “*extraordinary*” to qualify for the designation. These local formulae contrast

with the more exacting standard noted above for NPS above – that the individual’s civic relationship with the Park Asset be of “*transcendent importance*.”

Several of the policies establish a screening or approval process to support justification for a proposal for commemorative naming. For example, Winchester, Virginia and Portland, Oregon, require an application, review and recommendation by a citizen advisory board of some sort. In Dallas, the policy also involves a signature petition to evidence a “community consensus” that is necessary to support each individual naming. The number of signatures required on the petition is based on the relative size of facility – ranging from 200 residents who live within a half-mile radius of a neighborhood park to 1,000 residents from anywhere in the city for a major regional park facility.

Our proposals for revision to the Naming Policy include adjustments to the standards for commemoration, but we do not include any changes that would diminish the Planning Board’s discretion or its ultimate authority to make naming decisions.

VI. CONCLUSION

The foregoing analysis is provided to support your consideration of potential improvements to the existing Naming Policy. In our view, although a variety of reasonable approaches are possible, the changes we have proposed in **Attachment A** emphasize (a) more public transparency by establishing understandable benchmarks and, in addition, (b) more consistency with our view of the better or best practices deduced from our informal survey research. Please let us know if there is any further assistance we can provide.

cc: Michael F. Riley, Director, Montgomery County Parks Department
Miti Figueredo, Deputy Director, Montgomery County Parks Department

EXISTING COMMEMORATIVE NAMING POLICY

IV. COMMEMORATIVE NAMING

The Board retains its sole and exclusive discretion to name, rename and dedicate Park Assets or provide memorials to individuals without regard to any charitable contribution. The factors the Board may consider for this purpose include whether the individual:

- 1) Has performed extraordinary public service in support of parks, trails and/or open space;
- 2) Is or was an outstanding community leader who made significant civic contributions to the County and/or the M-NCPPC; and or
- 3) Is or was an outstanding regional or statewide leader who significantly furthered the mission of parks and/or land conservation.

PROPOSED REVISION TO COMMEMORATIVE NAMING POLICY

IV. COMMEMORATIVE NAMING

The Planning Board strongly encourages naming each Park Asset to signify nearby geographical or ecological features, a neighborhood identity, or a relationship to other nearby public facilities (“Geographic Name”) -- generally, to assist the public in associating the Park Asset positively within a relevant named community or significant place. For this purpose, the Board retains its sole and exclusive discretion with regard to Commemorative Naming (as defined by this Policy).

Only in exceptional circumstances will the Planning Board consider a Commemorative Naming proposal with respect to a particular Park Asset. A Commemorative Naming will not be considered unless each of the following conditions has been demonstrated to the satisfaction of the Planning Board:

- 1) The individual proposed as the subject for naming:
 - a) Has been deceased for at least five (5) years; and
 - b) Achieved an exemplary level of community esteem during life.
- 2) A broad cross-section of community leaders:
 - a) Expresses formal support for the naming; and
 - b) Demonstrates that a substantial consensus in favor of the naming exists both in the area immediately surrounding the park or facility to be named and in the larger Montgomery County civic community.

- 3) After appropriate research and evaluation, the Department produces documentation sufficient for the Planning Board to conclude that:
 - a) The requirements and conditions set forth above in paragraphs (1) and (2) have been satisfied; and
 - b) During life, the individual proposed as the subject for naming established and maintained an exceptional level of support for the Park Asset, park system, or related trails and open spaces in Montgomery County.
 - c) For purposes of this paragraph, an “exceptional level of support” means a sustained civic contribution during life that necessarily involved making personal sacrifices which inured to the benefit of other people in their access, utilization or enjoyment of the Park Asset, park system, or related trails and open spaces in Montgomery County.

If a Park Asset already bears a Geographic Name, a Commemorative Naming that changes the way a park or facilities is publicly identified may result in confusion among Park patrons and a financial burden on the park system associated with acquiring and installing new signage, changing maps and other wayfinding resources, and publicizing the new name. If the Planning Board does consider such a proposal, it will evaluate among other factors whether funds to cover the direct and indirect costs of the renaming would be provided outside of the Parks Department budget.

**The Maryland-National Capital Park and Planning Commission
Montgomery County Parks Department
Individual Naming and Dedication Policy
Adopted December 1, 2011**

I. PURPOSE AND SCOPE

The purpose of this policy is to establish guidelines to govern the Maryland-National Capital Park and Planning Commission, Montgomery County Parks Department, the Montgomery County Planning Board, and the Montgomery County Parks Foundation in the development and management of a program of naming and dedicating certain assets within the Montgomery County park system in honor of individuals whether alive or deceased. This policy does not address naming or dedications made in honor of any corporation, association, or other legal entity that is not an individual; whether the entity is organized for-profit or not.

II. DEFINITIONS

Board: The Montgomery County Planning Board of the Maryland-National Capital Park and Planning Commission.

Commemorative Naming: The process of naming or Dedication of Park Assets to recognize an individual without regard to any financial contribution.

Dedication: The process of dedicating, without naming, Park Assets in honor of an individual.

Department: The Montgomery County Parks Department of the M-NCPPC.

Foundation: The Montgomery County Parks Foundation, Inc.

M-NCPPC: The Maryland-National Capital Park and Planning Commission.

Park Assets: Parks, fields, playgrounds, pavilions, structures and other facilities, buildings, rooms, landscaping, art or other physical features, and Commission recreation or interpretive programs, in each case, owned or operated and designated by M-NCPPC to be available for naming.

Philanthropic Naming: The process of naming Park Assets in honor of an individual in recognition of a significant financial contribution.

III. POLICY STATEMENT

The M-NCPPC has the exclusive right to name, rename or dedicate Park Assets and retains the exclusive right to name, rename or dedicate Park Assets being managed or operated by a third party.

The Board has adopted this policy to capture a positive fiscal impact from naming or renaming Park Assets in honor of individuals by encouraging financial contributions of significance made directly, or on their behalf, to the Foundation (Philanthropic Naming). Implementation of this policy has the potential to realize significant revenue for the M-NCPPC to develop, maintain, improve, expand, support, preserve, fund, encourage and sustain its parks, facilities, programs and services for the benefit of users and the community at large. A successful naming program can also help avoid increased taxation or higher user fees.

In appropriate circumstances, the Board will continue to consider naming, renaming or dedicating Park Assets in honor of an individual for commemorative purposes (Commemorative Naming and Dedication) as provided in this policy.

IV. COMMEMORATIVE NAMING

The Board retains its sole and exclusive discretion to name, rename and dedicate Park Assets or provide memorials to individuals without regard to any charitable contribution. The factors the Board may consider for this purpose include whether the individual:

- 1) has performed extraordinary public service in support of parks, trails and/or open space;
- 2) is or was an outstanding community leader who made significant civic contributions to the County and/or the M-NCPPC; and/or
- 3) is or was an outstanding regional or statewide leader who significantly furthered the mission of parks and/or land conservation

V. PHILANTHROPIC NAMING

A. Financial Contributions

Philanthropic Naming opportunities will be considered in conjunction with charitable contributions made to the Foundation for the benefit of the Department and the M-NCPPC park system. Non-cash contributions, with the exception of land gifts, will generally not be considered for Philanthropic Naming opportunities. The Foundation will hold the proceeds from all charitable contributions in trust for the sole benefit of the Department to be utilized for the upkeep, maintenance, and/or operation of the specified Park Asset(s). Financial contributions maintained by the Foundation will not be refundable under any circumstances.

The appropriate financial contributions for Philanthropic Naming opportunities shall be determined by the Foundation through negotiation with the prospective donor.

The amount of the charitable contribution associated with a Philanthropic Naming opportunity should be sufficient to cover:

- All or a significant portion of annual maintenance and/or program expenses for the Park Asset during the full term of the agreement;
- Naming expenses incurred by the Department, including design, production and installation costs for plaques, signage, and other recognition benefits;
- An administrative fee for the Foundation of up to 12%.

A customized donor agreement between the donor and the MCPF will be executed with each donor when Philanthropic Naming opportunities are approved. Each agreement will adhere to a form approved by M-NCPPC legal counsel, the Executive Director, and the Secretary-Treasurer and require the signature of the Director of the Department to evidence M-NCPPC consent. The agreement will recognize M-NCPPC as the owner of the Park Asset and stipulate the Department is a beneficiary of the agreement. The agreement will outline the details of the Philanthropic Naming opportunity, the gift amount and recognition benefits; provided, that no agreement shall give a donor an enforceable power to direct, or implied power to direct, the Department or M-NCPPC on matters of policy or any other governmental process.

B. Naming Standards

The legal first, middle, and last given names (or respective initials) of individuals will be considered for Philanthropic Naming opportunities. Nicknames may be considered in the Department's discretion, provided that the individual's nickname:

- 1) is widely known in the public domain or is used to distinguish the individual from another individual with the similar name;
- 2) does not include a title, honorary title, or word that gives impression of a title except for public officials as described below;
- 3) does not describe an activity, event or experience;
- 4) does not refer to a business or commercial enterprise of the individual; and
- 5) is not rejected for the reasons outlined below.

The names of fictional characters, professional titles and academic degrees are not permitted. Titles established by federal, state or local law for public officials, may be included for a naming, renaming or dedication opportunity at the discretion of the Department. Consent must be granted by the individual being honored through the naming, renaming or dedication opportunity or, if the individual is deceased, by his or her heirs.

Names containing words or phrases that are reasonably deemed by the Foundation or Department to be harmful or otherwise developmentally inappropriate for the purpose of communication with, or public display to, children under six years of age are not permissible. This standard is used so as to maintain family appropriateness in the M-NCPPC park system. Examples of names that may be rejected for this reason are those with words and phrases that:

- Are sexually suggestive or obscene;
- Denigrate people on the basis of race, ethnicity, religion, or any other classification protected by law;
- Connote inappropriate violence or intimidation; or
- Relate events, activities or behaviors that are criminal.

The name of any individual who is convicted of a crime of infamy or moral turpitude is not eligible for a Philanthropic Naming opportunity, and the Department may revoke its prior consent if an individual is convicted after the term of a Philanthropic Naming agreement begins.

C. Appeals

Any applicant for a Philanthropic Naming opportunity who is aggrieved by a decision of the Foundation or Department may appeal that decision to the Board. The Board will provide the applicant with an opportunity to be heard and consider the basis of appeal on the merits. After due consideration, the Board will provide its decision on the appeal in writing and that decision will be final.

D. Recognition Benefits

As provided by agreement with the donor responsible for an approved Philanthropic Naming opportunity, the Foundation shall place semi-permanent naming plaques and/or signage in parks, on facilities, or in the general area where the approved Park Asset is located. The layout and content of any markers, signage or plaque must conform to all park signage standards, standardized text and related policies promulgated by the Department from time to time.

The minimum term of agreement for each Philanthropic Naming opportunity depends on the nature of the Park Asset involved. Generally, the minimum term for an entire park shall be twenty (20) years. The minimum term for other Park Assets shall be established by the Department by a standardized schedule developed to reflect the expected life cycle of the Park Asset or changes in facility use or design, and/or as determined by the Foundation in negotiation with the donor. When the term expires, the donor or their successors may be given the opportunity to renew the naming, renaming or dedication opportunity, the Department may elect to consider other Commemorative or Philanthropic naming proposals, or the Department may elect to eliminate the Park Asset from further naming.

In the event it becomes unnecessary, undesirable, or impractical to continue operating and maintaining the named facility or program designated as a Park Asset during the term of a Philanthropic Naming

agreement, the Foundation shall coordinate with the Department to offer the donor an opportunity to name a reasonably comparable Park Asset for the remainder of the term. Should the donor or its successor become unavailable, the Foundation shall be entitled to utilize the funds to support Department facilities or programs it deems to be comparable to those identified by the original donor, and the Foundation may continue an alternative naming, renaming or dedication opportunity as determined by the Foundation trustees and approved by the Department.

VI. ADMINISTRATION

Pursuant to a binding memorandum of understanding approved by the Board and Foundation for the purpose of incorporating and implementing this policy, the process for Philanthropic Naming will be administered by the Foundation. This process includes, but is not limited to the marketing of Philanthropic Naming opportunities, renaming or dedications, negotiating terms of proposed naming agreements, and presenting those agreements to Foundation trustees and the Department for approval. The process for commemorative requests will be administered by the Department. The Department is authorized to promulgate appropriate standards, policies and regulations necessary to effectuate the purpose of this policy.

Commencing six (6) months after the adoption of this policy by the Board and every six (6) months thereafter, the Foundation and the Department will provide to the Board, a list of the Philanthropic Naming opportunities that have been requested and/or the Park Assets that have been named or renamed as a result of a Philanthropic Naming opportunity.

Unanimously approved and adopted by the Montgomery County Planning Board December 1, 2011.