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Dear Ms. Anderson and Dr. Gonzáles-Tenant:

This letter responds to a March 18, 2024, petition on behalf of Young Performing Artists, Inc. (YPA) and an April 15, 2024, petition from Dr. Gonzáles-Tennant, both pursuant to 36 C.F.R. § 60.6(t) requesting the Keeper of the National Register of Historic

Boundary Defects

Both petitions raise concerns regarding the district's boundary. The revised nomination makes no change to the boundary. Instead, it seeks to clarify the reasons the boundary was selected. The original nomination provided three reasons as to why certain parcels were included in the district's boundary:

the parcel was originally owned by an African American; or
the parcel was purchased by an African American during the period of significance; or
the parcel is within "White-owned areas that have been documented as being significant to the economic and social activities of Royal's African American residents."

(Original nomination, Section 7, pg. 2)

The reasons provided in the revised nomination are similar, but qualified:

The district's boundary encompasses *many* of the original properties secured by African Americans through the Homestead Act of 1862, additional properties purchased by African Americans during the **period** of significance (1870-1972), and *portions of* White-owned areas that have been documented as being significant to the economic and social activities of Royal's African American residents.

(Revised nomination, Section 7, pg. 3,

community: it states that “[p]roperties with substantial acreage”—like the community of Royal—“require more explanation than those confined to small city lots”; it then provides a specific example where the reason for exclusion is straightforwardly explained, stating that a certain farm parcel “has been excluded because it has been subdivided and developed into a residential neighborhood” (*Form Bulletin*, p. 55). By contrast, it is not clear from the revised nomination’s boundary justification whether all properties owned or worked by the original Royal residents that retain integrity are included in the boundary or if the properties included within the boundary (*e.g.*, “most” of the properties owned or work by the original Royal residents) retain integrity. While the former is a justified boundary, the latter is not. Likewise, just what is meant by “core of the ownership” is unclear.

Current zoning practices and disputed historic associations are identified as reasons for the boundary selection:

On the southern edge of the district, the boundary excludes properties no longer zoned agricultural or rural residential, which are often located along I-75 or State Route 44. These parcels are now zoned commercial or industrial, which are land uses incompatible with the historic district.

(Revised nomination, Section 10, p. 87.)

The selection of a boundary should be based on the property’s historic significance and integrity, not current zoning practices (*Form Bulletin*, p. 55; *Rural Bulletin*, p. 28). (Although current zoning is irrelevant to boundary selection, the assertion in the revised nomination that areas zoned as commercial or industrial

Level of Significance Defects

In the revised nomination at Section 3 “State/Federal Agency Certification,” the FL SHPO certified the historic district as significant at both the state and local levels of significance. As in the original nomination, Section 8 “Significance” of the revised nomination documents local and state significance

