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NATIONAL PARK SERVICE

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Dear Dr. Gonzalez-Tennant and Ms. Kirsten Anderson:

This letter responds to petitions of July 19, 2023, from Dr. Edward Gonzalez-Tennant, and August 11, 2023, from Kirsten Anderson on behalf of the Young Performing Artists, Inc. (YPA) pursuant to 36 C.F.R. § 60.6(t) requesting the Keeper of the National Register of Historic Places (National Register) substantively review the nomination of the Community of Royal Rural Historic District (Royal Rural HD, or property) to the National Register.

The nomination for the Royal Rural HD was received by the Keeper on July 3, 2023, and its regulatory 45-day review period was to have ended August 17, 2023. The petition of July 19, 2023, extended the review period by 30 days from the date of receipt of the petition, bringing the end of the review period to August 21, 2023 (as August 18, 2023, is a Saturday). The petition of August 11, 2023, was received August 14, 2023; it further extended the review period to September 13, 2023. I have carefully reviewed these two petitions and supporting documents—including an alternative nomination prepared by Edward Gonzalez-Tennant and Diana Gonzalez-Tennant—and substantively reviewed the nomination submitted by the Florida State Historic Preservation Officer (FL SHPO).

I find that while the property appears to meet the criteria for listing in the National Register, the nomination submitted by the FL SHPO is neither adequately documented nor technically and professionally correct and sufficient as required by 36 C.F.R. § 60.3(i) for the reasons discussed below.

Summary of the Property

The nomination describes the Royal Rural Historic District as significant at the local and state levels under Criterion A for Ethnic Heritage: Black; Agriculture; Exploration/Settlement; and Community Planning and Development. The period of significance begins circa 1870, when the initial group of Black homesteaders arrived in the area, and extends to 1972 in keeping with National Register policy of typically considering only properties of 50-plus-years-old. The community of Royal began as a Black Homesteader Colony and today is the only extant example in Florida. It is unique in that the community grew from descendants of the homesteaders, with many parcels remaining in the same family. The proposed district also includes other land that was significant to African American community members during the period of significance.

Boundary Justification

The nomination provides three reasons as to why any given parcel is 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."

(Nomination, Section 7, pg. 2)

However, the boundary presented in the nomination's maps at Figure 4 clearly excludes historically African American owned parcels. Additionally, it is unclear whether the reference to "White-owned areas" is meant to refer to *historically* White-owned areas or currently White-owned areas. Further, the Boundary Justification states that a parcel may have been excluded due to "a lack of conclusive evidence" (Nomination, Section 10, page 4) but what this evidence is or how this evidence was determined inconclusive is not discussed in the nomination. Together, these discrepancies result in inadequate documentation as to why some parcels are included but others are not. The nomination should clearly articulate—and with respect to maps, demarcate—the parcels included in the boundary and the methodology for including and excluding parcels from the proposed district.

Likewise, clarification regarding the exclusion of certain former agricultural areas and wooded or forested areas is needed to ensure this property is adequately documented. The Boundary Justification at Section 10 explains that

[s]ome parcels were excluded as they no longer retained integrity as historic agricultural fields. While currently zoned for agricultural use, these parcels may be forested...and no longer convey their historic use as fields for tobacco, sugar cane, or other row crops, nor as open pastures for livestock.

(Nomination, Section 10, p. 4)

However, in the discussion of the property's integrity at Section 7, many of the agricultural fields

are described as no longer extant—“the fields of tobacco and sugarcane that were once a ubiquitous presence in Royal are largely gone except for smaller scale growing still taking place amongst some of the descendants that is more commemorative in nature”—but excuses this condition, noting only that “evidence of past agricultural use is still found within the landscape and within the built environment” and including these former fields within the district’s boundary. (Nomination, Section 7, p. 14.) Likewise, some wooded parcels are included within the district’s boundary while others are not. The nomination quotes a citizen as observing that “[a] lot of this was still woods” (Nomination, Section 7, p. 9) suggesting that the area within the district’s boundary has changed considerably since the period of significance yet both wooded and formerly wooded areas are included within the district’s boundary. The Boundary Justification should explain why the boundary was drawn to include some former agricultural areas and wooded area, and exclude others.

Level of Significance

In Section 3 of the nomination, FL SHPO certifies the property as significant at the state level.¹ Section 8 of the nomination well-documents local and state significance by placing the community of Royal within the context of Florida (pp. 1-8) and Sumpter County (pp. 8-10), and discussing the development of the community of Royal (pp. 11-14). There is no discussion in the nomination of the property’s national significance. Both petitioners maintain that the property is also significant at the national level. Petitioner YPA further asserts that FL SHPO has misconstrued National Park Service (NPS) guidance in failing to recognize the national significance of the property. However, it appears that YPA has misunderstood NPS’ guidance and their draft nomination does not demonstrate that the Royal Rural HD is significant at the national level.

As provided in NPS’s foundational guidance document, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation (1997)* (Criteria Bulletin), historic contexts “are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear.” (Criteria Bulletin, p. 10.)² The nomination, as noted above, places the property squarely within state and local historical contexts.

YPA has provided with their petition a draft nomination (YPA nomination) but that document does not include a national historic context on any of the areas of significance specified at Section 8, namely, Ethnic Heritage: Black; Agriculture; Exploration/Settlement; and Community Planning and Development. Indeed, the YPA nomination’s discussion of significance is identical to the nomination submitted to the National Register by FL SHPO but for the addition of the word “national” in the opening sentence of Section 8 at page 1: “The Community of Royal Rural Historic District is significant at the local, state, *and national* levels under Criterion A for Ethnic

¹ As noted in the discussion herein of the nomination’s technical issues, the text at Section 8 describes the property as significant at the state *and local* levels, and the box for “local” significance should be checked in Section 3.

² This definition is echoed in *National Register Bulletin: Guidelines for Evaluating and Documenting Rural Historic Landscapes (1999)* (Rural Bulletin), at page 7, cited by YPA in their petition: “A historic context is an important theme, pattern, or trend in the historical development of a locality, State, or the nation at a particular time in history or prehistory.”

Heritage: Black, Settlement/Exploration, Community Planning and Development, and Agriculture.” (Emphasis added.) Although both the FL SHPO nomination and the YPA nomination state that “Royal’s persistence as a Black Homesteader Colony to the present is nationally unique, the only other example being the National Historic Site of Nicodemus, Kansas” (Section 8, p. 1), neither nomination provides support for Royal as “nationally unique.” Additionally, both nominations state that “the targeting of Black communities nationwide for infrastructural projects such as transportation and power corridors is not unique to Sumter County or Florida” (Section 8, p. 1), and while the targeted destruction of Black communities for infrastructure projects is well-documented in professional and popular literature, to demonstrate that Royal Rural HD is nationally significant for its persistence in the face of destructive national policies, those arguments must be presented, with appropriate citations, in the nomination. They are not.

As provided in NPS’ Rural Bulletin—and as correctly cited by YPA in its petition—properties “relating to the same historic contexts may be compared to identify those eligible for listing in the National Register and to determine the relative level—local, State, or national—at which the property is significant.” (Rural Bulletin, p. 13.) As further explained in the Criteria Bulletin,

Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties *if*:

- It is the sole example of a property type that is important in illustrating the historic context or
- It clearly possesses the defined characteristics required to strongly represent the context.

If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility. The geographic level (local, State, or national) at which this evaluation is made is the same as the level of the historic context.

(Criteria Bulletin, p. 9.) While both the FL SHPO nomination and the YPA nomination describe the property type—Black homesteads—no national historic context for Black homesteading has been provided in either nomination. Therefore, the Royal Rural HD is neither demonstrated to be the sole example of this property type important in illustrating such a context nor—because no context is provided—is it described as possessing the characteristics that would strongly represent such a national context. Indeed, YPA’s petition appears to contradict the “sole example” condition by asserting that “the history of Royal is inextricably intertwined with the history of *surviving* Black and rural communities nationwide.” (YPA Petition, p. 3, emphasis added.)³ The level of significance may be reassessed should a future nomination include a national context, including comparative properties.

³ Note that the National Register-listed and NHL-designated “surviving African American communities” cited in YPA’s petition are not comparable to the Royal Rural Historic District, as these places are nationally significant within different historic contexts for their unique characteristics, specifically, as the sole remaining town in the U.S.

Technical Issues

The documentation provided by this nomination demonstrates that the property is significant at both the local and states levels of significance. Both the “local” and “statewide” at Section 3 “State/Federal Agency Certification” should be checked.

There is much that is included at Section 7 “Description” that should properly be included at Section 8 “Statement of Significance.” The purpose of Section 7 is to provide a physical description of the property/district, its setting, and its integrity, including how it has physically changed over time. By contrast, Section 8 presents a property/district in its historic context. Contextual information in the nomination at Section 7 should be moved to Section 8. Please see *National Register Bulletin: How to Complete the National Register Form*, pages 24 to 51, for additional guidance.

Because the nomination includes multiple maps, please include a column in the inventory tables at Section 7 with references to the corresponding map number.

Finally, both petitioners have raised concerns about the proposed historic district’s acreage. Please ensure the acreage accurately reflects the nominated boundary.

By way of this letter, I am returning the nomination to the FL SHPO to address the boundary issues as well as the other technical issues as described above. FL SHPO and petitioners may wish to continue to collaborate to revise the nomination to address national significance as described above.

If you have any questions, please contact Sherry Frear, Chief and Deputy Keeper of the National Register, at (202) 913-3763 or sherry_frear@nps.gov.

Sincerely,

Joy Beasley
Associate Director, Cultural Resources,
Partnerships, and Science
Keeper of the National Register of Historic Places

cc: Ruben Acosta, Florida State Historic Preservation Office,
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of the Exoduster Movement; as the oldest Black incorporated municipality in the U.S., and the home of nationally prominent scholar and writer Zora Neale Hurston; as the location of the leading national producers of rice; and as the location of the leading federal source of timber for U.S. Navy ships. A fifth property cited by YPA, Faunsdale Plantation, is significant at the local level only.