

Date: February 13, 2025

TO: Chairman Timmons, Museums and History Board

FROM: Lou Ann Speulda-Drews

RE: Review of *Historic Places Associated with Latinos in Nevada MPDF* and *Culinary Union Local 226 Headquarters Building Nomination*

As a member of the Museum and History Board I have reviewed the two documents and National Register Bulletin 16B “How to Complete the National Register Multiple Property Documentation Form” guidance from the National Park Service. I have prepared nominations for buildings, districts, and archaeological sites and based on my previous experience and the Bulletin 16B guidelines, I’m offering the following comments and suggestions for edits to the *Latinos in Nevada MPDF*. The comments are divided into two types – General and Specific. The specific comments and edits are listed below in a table format with page and paragraph.

*Historic Places Associated with Latinos in Nevada MPDF*

General Comments: The *Latino History MPDF* is a broad-brush approach lacking necessary details to link the history with property types. The document would be stronger if the links between theme and property types were stronger, and the property types included examples. There are several themes presented that are unlikely to have properties represented in Nevada. I would suggest deleting the topics that lack the potential for historic properties. As noted in National Register Bulletin 16B, it is not a requirement that all potential themes be presented, “...documentation form must include at least one historic context and one associated property type discussion. Additional historic contexts and associated property types may be submitted at a later date” (Bulletin 16B:3). The *Latino History MPDF* would be a stronger document if it focused on one or two themes with a more well-developed historic context and known property types.

I recommend revising the *Latino History MPDF* to focus on the historic contexts and themes that have known properties associated with them and concentrate efforts on evaluating/listing those properties.


The period of significance 1864-2000 appears to be arbitrary. “The time period covered by a historic context is based on the period of time when the events significant to the historic context are known to have occurred” (Bulletin 16B:6). The dates chosen are not tied to a particular theme or property, nor do the dates reflect the history of Latinos in Nevada. For instance, Latinos were not directly involved in statehood (1864) and the end of a century is not a significant historic event.

Why doesn’t the period of significance begin with the actual history of Mexican activities and occupation within Nevada (1821-1848)? Extending the period of significance to 1821 would allow the early years of exploration, travel routes, and mining to be included.

Historic themes and properties are discussed that predate statehood and some of the discussion postdates 2000. The date of 2000 is too recent to critically determine/evaluate a property for its historic contribution or important associations. The reason for the 50-year rule is to provide a length of time suitable for developing historic contexts and determining significant historic properties. I recommend that the MPDF begin with the date of 1821 (to include Mexican Period) and concluded with 1980, closer to the 50-year guideline.

Specific Comments:

Page/Paragraph	Text	Correction
1 <sup>st</sup> page A	Title and date range	Should be <u>Historic Properties</u> (not places). Reset time period to include Comstock and other mining sites dating to 1859, or the “Mexican Period” 1821 to 1848. I suggest the period of 1821 to 1980.
1 <sup>st</sup> page B	Historic contexts	List as it appears under this heading should be repeated in the same order in the historic contexts (section E) and property types (Section F). It is confusing to turn from the context to the property types and not have them be in the same order.
E-1/	Ethnic Heritage... 2nd para/ last sentence	Delete last sentence “the tribes present today have been in Nevada for 2,000 to 5,000 years. This is inaccurate, too generic, and irrelevant to this context.
E-1	Ethnic Heritage...3 <sup>rd</sup> para	Discussion begins with Spanish period – why is this not included in the document? Predates the date range defined for the document.
E2	Discussion of Spanish Trail – but predates the period of significance (1829-1840s)	Is the Spanish Period considered Latino History? Should the period be expanded to the 1820s?
E2	Statehood in 1864 – why is this date chosen for the period of significance?	Mexican independence from Spain in 1821, controlled SW until Treaty of Guadalupe-Hidalgo in 1848 ~ 1850s. Why isn’t this period discussed as important? There are resources that date to this period of 1821-1860s.
E3	Juntas or social clubs	Are there any in Nevada? Is there a link to modern social clubs?

E-11	2 <sup>nd</sup> para	If the 1960s Chicano Movement occurred primarily in other states, then it is not an important theme in this nomination. Document should focus on the Nevada-related themes and resources. When did the Chicano Movement occur in Nevada? Are there property types associated with this theme?
E-16	1 <sup>st</sup> para	This paragraph provides information from 2021! This is too recent to be considered relevant and post-dates the 2000 end date of the MPDF.
E-16-E17	Industry, 3 <sup>rd</sup> para. And continues on page E-17	Provides good example of Mexican miners in the initial phase of Nevada mining – but all the information pre-dates the nomination date range. This is a good reason to change the period of significance date range.
E-19	Mexican Mine and family residence Also includes Rhyolite and Hilltop Districts	Great examples, but all predate 1864!
E-20	Columbus Mining District	Began in 1860 by Mexican miners.
E-23	Transportation- 3 <sup>rd</sup> para  RR-Tie Cabin (Courtesy Desert NWR).	Figure 6 is NOT related to Latinos, is on Federal property, and is included as a contributing element of the Corn Creek Campsite Historic District. Please <u>remove</u> this photo. Also, the photo is from the 1970s. The current building was restored by the US Fish and Wildlife Service in 2000 to its original appearance and does not look like the photo. It is also interpreted as part of a trail system at the Desert National Wildlife Refuge. The refuge was established in 1939. The building was constructed by ranch owners in the 1920s with RR ties from the abandoned Las Vegas-Tonopah Railroad.

F-1	Chronological Period	Arbitrary date range. The history of Latinos in Nevada can be traced back to the 1820s and clearly the “Mexican Period” 1821-1848; and mining history of the 1850s-1860s. Statehood and the end of the century is not specifically associated with Latino history.
F-2	List of themes	The list of themes should be in the same order as on page 1-B.
F-18	Transportation/Railroads* The property type discussion is weak and includes repetitive paragraphs for addressing integrity – this could be included once at the end of the discussion.	RR-tie architecture is not in the potential property types list.
Additional Documentation pg 6	Figure 6.	Photo needs to be deleted or replaced with a RR-tie building that relates to this nomination. The example used is not related to Latinos, is on Federal property, and is already included in a National Register listed historic district.
<p>*Document each property type in Section F...using survey data and other information, <b>describe</b> the associative and physical characteristics that define each property type and discuss its <b>significance</b> to the historic context. Assess the qualities and condition of existing related properties. Determine the characteristics or qualities and the degree of historic integrity <b>required for the registration</b> of related properties in the National Register as a member of the property type” (Bulletin 16B:7).</p>		

*Culinary Union Local 226 Headquarters Building Nomination*

General Comments: The Culinary Union property is clearly a significant building in Las Vegas labor history. However, the historical roots go deeper than just the six-year period represented in this nomination. The narrow slice of history presented in this nomination is just a snapshot of the labor union history that could be discussed more fully for this property. Labor history in Las Vegas in the 1940s and 1950s, which lead to the construction of the building is important. The 1970s and 1980s also brought changes to the labor industry and to this building. By including the early years of labor history with the more recent Latino leadership would make a stronger nomination with the expanded period of significance to include the 1930s-1990s period. The evolution of labor leaders and changes in the union membership are compelling stories.

If proceeding with the current nomination I would recommend revising the Culinary Union nomination as a stand-alone document. Information referenced in the MPDF are specific and only a few paragraphs long so could easily be added to the nomination or at least summarized more fully in the nomination.

To: Board of Museums and History

From: Bert Bedeau

Re: National Register nomination comments From the December BMH meeting  
2/14/25

Latino Historic Places MPD:

I recommend that the BMH reject this nomination and that no further revisions be made to it.

This document attempts to synthesize 160 years of Nevada history regarding a wide-ranging cultural slice of our population and across no less than eight areas of potential significance and all four National Register eligibility criteria. It does not achieve this purpose. The Multiple Property Submission format for the National Register of Historic Places is designed to establish clear context and criteria for placing individual properties on the National Register. As such, one seeking to list an individual property within the scope of the MPD would merely need to describe the resource and indicate where it fits in the context and specific property type structure established by the MPD.

In the case of the document before us, we have neither a sufficient historic context nor a detailed enough property type analysis and discussion to fulfill this function. The Section E historical context information provided in the MPD is, in many instances, written on an extremely broad, even a national, level. This is acceptable as context information surely. However, it is not accompanied by sufficient state or local level discussion to truly establish a context for the influence and history of Latinos across Nevada from 1864-2000--particularly in all eight of the areas of historical significance indicated. As such, an individual property nomination will per force need to establish a complete context statement, thereby defeating the purpose of an MPD.

I have also found some of the local context information provided to be inaccurate. The section on Mining concerning Virginia City relies on one notoriously erroneous source while ignoring others and mistakenly attributes information to a California History article that I was not able to corroborate. In addition, it ignores aspects of the Latino contribution to the early history of the Comstock. I am less familiar with other aspects and locations discussed in the historical context, but I believe that this document may make significant errors and omissions in its discussion of the topic of Latino history in Nevada as well. Examples can be discussed in detail should this document not be rejected. There is also a tendency on the part of the authors to editorialize past documentation efforts, These are inappropriate and should be removed.

The Section F property type discussion is of equal concern. It is as broad and vague as the historic context statement. The discussion of individual property types for Criteria A and B are spread over eight categories of potential significance. They are so generic as to provide virtually no guidance beyond requiring a property to possess some basic association with Latino history or

persons. The property type discussion for Criterion C is even less helpful, essentially repeating standard NPS language regarding the application of the Criterion with a nod toward bulletins on landscapes and traditional cultural properties. The discussion of Criterion D is almost non-existent, and I will defer discussion of its inadequacies to my archaeologist colleagues.

In sum, this document would provide no assistance in seeking to list an individual property in the National Register. A fully researched, justified, and written Context Statement and Property Description would still be needed for any listing associated with this proposed MPD. That is not the purpose of an MPD. Indeed, I believe that a topic of this type and magnitude is not what the MPD format was created for, nor is suitable for application too.

Culinary Union Local 226 Headquarters Building:

This individual nomination should be uncoupled from the Latino Historic Places MPD and resubmitted as a stand-alone nomination. It should be listed for its Criterion A significance at the statewide level for association with important events in both Social and Latino history between 1956 and 1997. This revised nomination should emphasize the exceptional significance of the events that are associated with this site that occurred less than 50 years ago, It should also describe how the site retains sufficient integrity to convey its historical significance in light of the numerous alterations made to the site over the years. It would be preferable to classify the primary structure here as an example of the International Style, despite several modifications.

Board Member, Michelle Schmitter

Comments on:

1. Culinary Union

- a. Should be stand-alone nomination not linked to MPDF
- b. Section 7, I would classify style as International

2. MPDF

- a. Too Broad and too vague in some areas such as healthcare and construction and landscaping. Perhaps divide up to North, South, and Rurals since regional differences. No mention of Lake Tahoe Nevada casinos and construction industry and tourism/recreation since time period goes to 2000.
- b. Research not in the weeds enough in many areas, need to connect with local experts. I.e calls out Mexican Mine but not Mexican Mill or Mexican ditch in Carson City. **“The Mexican Mill or Silver State Reduction Works was constructed at Empire City in 1860 to reduce silver ore removed from the Mexican Mine at Virginia City. To collect and maintain a sufficient water supply to drive the wheel, it was necessary to construct several low dams across the Carson River at the mouth of its canyon behind Prison Hill, approximately 4.5 miles south of the mill.”**
- c. All inclusive – when every building is significant, nothing is significant.
- d. How would I use it my work, most likely when documenting a residential District. Good discussion on embellishing homes.