



U.S. Department
of Transportation

**Federal Highway
Administration**

Virginia Division
(804)775-3320

P.O. Box 10249
400 N. 8th Street Rm. 750
Richmond, Virginia 23240

IN REPLY REFER TO:

September 5, 2003

Interstate 73;
Reconsideration of the Determination
of Eligibility for the National Register
of Historic Places for the Southeast
Roanoke neighborhood;
State No. 0073-962-F101;
VDHR No. 94-0572
Henry, Franklin, Roanoke, Bedford, and
Botetourt Counties and the City of
Roanoke;

Ms. Carol Shull
Keeper of the *National Register of Historic Places*
United States Department of the Interior
National Park Service
1849 C. Street, NW
Washington, D.C. 20240

Attention Mr. Patrick Andrus:

Dear Ms. Shull:

By letter dated July 18, 2003, FHWA provided you with additional documentation and requested that you reconsider the determination of eligibility for the Southeast Roanoke neighborhood issued on October 18, 2002. On August 18, 2003, the group known as Virginians for Appropriate Roads (VAR), a consulting party for the proposed undertaking, submitted additional material to your office in support of their contention that the Southeast Roanoke neighborhood constitutes an eligible historic district. This office was copied on that material, and we would like to briefly address the content of VAR's submission.

VAR's consultant, contrary to your office's published directives on eligibility, has continually failed to put his studies into their *appropriate contexts*, for this and other properties reviewed as part of the Section 106 process for proposed Interstate 73, and criticizes the Virginia Department of Transportation's studies for doing so. It is our understanding that context is critical to eligibility, and we fail to see where VAR's reports, which have consistently failed to meet basic Virginia State Historic Preservation Office standards for mapping and identification, have ever developed an appropriate, objective context.

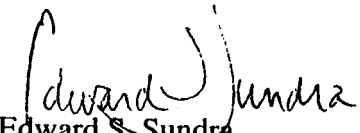
As has been pointed out on more than one occasion, the city of Roanoke was built in a very compressed time frame, and has an abundance of working class housing and neighborhoods, in a number of locations, all over the city, as the studies developed by VDOT's consultant has firmly established. VAR's consultant narrowly focused on a portion of Southeast Roanoke, never considering other comparable areas within the city, with a noticeable disregard for the level of integrity or historical connection in the area proposed. Both VDOT and the regional office of the Virginia State Historic Preservation Office have noted that VAR's boundaries are arbitrary, convenient and largely driven by their opposition to the project.

We believe VDOT's consultant, the Louis Berger Group, has developed a sound context for worker housing for the city for the type and period of significance that VAR had proposed for Southeast Roanoke, far exceeding the effort, level of documentation and objectivity of VAR's material. Simply listing a building as contributing does not, as VAR has successfully managed to argue so far, make it contributing.

We believe that VAR's standards, if accepted by the Keeper, will diminish the stature of the National Register of Historic Places. Your consideration of this perspective is greatly appreciated. If you have any questions or comments, please contact me at (804) 775-3338.

Sincerely,

Roberto Fonseca-Martinez
Division Administrator

By: 
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Environmental Specialist, Sr.

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