

United States Department of the Interior

NATIONAL PARK SERVICE 1849 C Street, N.W. Washington, D.C. 20240

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Mr. Edward S. Sundra
Environmental Specialist, Sr.
U.S. Department of Transportation
Federal Highway Administration - Virginia
Division
P.O. Box 10249
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SEP 1 5 2003

Dear Mr. Sundra:

Thank you for your letter of July 18, 2003, providing additional documentation on the Southeast Roanoke Neighborhood Historic District, in Roanoke, Virginia.

As you are aware, the Southeast Roanoke Neighborhood Historic District was determined to be eligible for the National Register of Historic Places for its historic and architectural significance on October 18, 2002. You have asked that the National Register reconsider this decision based upon additional documentation contained in a report prepared on behalf of the Virginia Department of Transportation for the Federal Highway Administration entitled "Supplemental Historical/Architectural Study, Interstate 73, City of Roanoke, July 2003," hereafter referred to as "VDOT report." We have also received from Virginians for Appropriate Roads, an official consulting party in the Section 106 process concerning construction of 1-73, a report entitled "Additional Information for Use in Review of National Register of Historic Places Determination of Eligibility: Southeast Neighborhood, City of Roanoke, Virginia, August 18, 2003," hereafter referred to as "VAR report."

After carefully considering all documentation submitted, including both the VDOT and VAR reports, I reaffirm that the Southeast Roanoke Neighborhood Historic District is eligible for the National Register of Historic Places with the same boundary as delineated in our determination of eligibility notification of October 18, 2002. The VDOT report (p.21) suggests that the area to the east of Jackson Park contains "comparable residential streetscapes" to that found in the eligible Southeast Roanoke Neighborhood Historic District. While it may be appropriate to expand the boundary of the Southeast Roanoke Neighborhood Historic District to include the area noted in the VDOT report, there is not sufficient documentation provided for the National Register to evaluate the area.

The National Register determined that the Southeast Roanoke Neighborhood Historic District, a late 19th/early20th century, mixed-use, working class neighborhood, is historically and architecturally significant for its association with the history of Roanoke's growth as a booming industrial center and railroad hub. The district contains important factories and hundreds of vernacular bungalows and American Foursquare residences of the city's industrial workers. The VDOT report proposes that a separate historic district, called the Morningside Historic District, qualifies for the National Register as a better representative of Roanoke's industrial heritage than the Southeast Roanoke Neighborhood Historic District.

Documentation submitted demonstrates that the area defined as the Southeast Roanoke Neighborhood Historic District was developed historically in a north to south direction between 1890-1945 as industrial facilities were constructed in this section of the city. The earliest (or northern) portion of the district was constructed as housing for railroad workers. As industry expanded to the south, new facilities, such as the Roanoke Iron and Bridge Company, the Continental Can Company (reportedly the largest tin can manufacturer in the South), other factories and warehouses, and additional housing for the workers were built. The final phase of industrial and residential development of the Southeast Roanoke Neighborhood Historic District occurred along its southern boundary following the construction and later expansion in the early 20th century of the American Viscose Corporation Plant, the world's largest manufacturer of rayon. In addition to including all of these industrial and residential features, the Southeast Roanoke Neighborhood Historic District also contains churches, a small number of commercial buildings, Morningside School (the neighborhood's public school), and Morningside Park.

As defined in the VDOT report, the boundary of the proposed Morningside Historic District overlaps that of the Southeast Roanoke Neighborhood Historic District in some areas, leaves out a section of residential and industrial properties included in the Southeast Roanoke Neighborhood Historic District along Morningside's western boundary, excludes a large area of workers housing that was included in the Southeast Roanoke Neighborhood Historic District along its northern border, and extends further to the east than the Southeast Roanoke Neighborhood Historic District to include Jackson Park and the area of workers' housing east of the park. As noted on page 23 of the VDOT report, the "boundaries of the Morningside Historic District would encompass the area most visibly and directly transformed by the arrival of American Viscose and its impact on the city's population," with a defined period of significance of 1917-1930.

The proposed Morningside Historic District, as described in the VDOT report, is defined by a narrow period of significance which does not address important industrial developments in the city and thus reflects a restricted view of the historic and architectural importance of southeast Roanoke. While the proposed Morningside Historic District includes a large section of the Southeast Roanoke Neighborhood Historic District, the Morningside Historic District excludes important nearby industrial facilities such as the Roanoke Iron and Bridge Company (1910), the Continental Can Company (ca. 1911), other early 20th century industrial properties, and a large section of housing associated with the railroad and other industries, all of which are located within the Southeast Roanoke Neighborhood Historic District. In summary, the Southeast Roanoke Neighborhood Historic District, as determined eligible for the National Register of Historic Places on October 18, 2002, provides a more thorough and inclusive representation of the important historic and architectural developments in this section of Roanoke than does the Morningside Historic District alone.

Sincerely,

Carol D. Shull

Carol D. Shull
Keeper of the National Register
of Historic Places

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