

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION**

June 17, 1997

SUBJECT: Allegheny County, City of Pittsburgh/Millvale Borough SR 0028, Section A09/10, Improvements Project Historic Structures Report
ER 97-8009-003

To: Brenda Barrett, Director
Bureau for Historic Preservation
Pennsylvania Historical and Museum Commission

FROM: Wayne W. Kober
Director
Bureau of Environmental Quality

Reference is made to your letter of June 4, 1997 requesting that the Bureau of Environmental Quality (BEQ) address a letter of Dr. David Rotenstein which alleged that the above referenced report was not thorough or accurate. The BEQ has reviewed the PHMC's letter and Dr. Rotenstein's letter as well as the Historic Resources Survey/Determination of Eligibility Report prepared by Cultural Heritage Research Services, Inc. (CHRS) . The BEQ feels that CHRS has made a reasonable and good faith effort to identify and evaluate properties within the project area as outlined in Section 800.4(a) as part of Section 106 of the National Historic Preservation Act. In addition, CHRS has sought information from local, private and public organizations as mandated by this Act.

Additional maps and more information on the tanning and meatpacking industries in the Duquesne City area would have been helpful in better understanding the development of the area. However, it is believed that due to the fact that either no properties related to these industries are extant within the project area or they have been determined eligible under other criteria/contexts, lack of this additional information is not critical for the Section 106 process.

The PHMC's letter of June 2, 1997 stated that they had been requested to re-evaluate the Marohnic House and Bookstore and consequently determined it eligible. It is not known if the request was accompanied with new information. Nevertheless, please note that PennDOT through CHRS's original September 1996 Structures Report determined that this property was eligible for the National Register due to its significance in association with the Croatian community. However, the PHMC in its letter of November 15, 1996 judged that this property was not eligible.

Rialto street, as described by Dr. Rotenstein, is not a significant transportation corridor. During the 19th century, cattle/livestock were herded over many streets/roads throughout the United States. If significant characteristics about this street are known, they should be submitted as additional information to BEQ through CHRS. At present no known extant features/structures related to this purported significant resource have been discovered.

Much of Dr. Rotenstein's additional information on the meatpacking industry pertains to Herr's Island. There are no standing structures on Herr's Island to be impacted by this project. The Troy Hill neighborhood, although not part of this survey, will be surveyed at a later time.

Again, the BEQ feels that PennDOT through CHRS has sufficiently fulfilled its obligations under Section 106. Section 106 does not require exhaustive, book-length research in order to provide information for determinations of eligibility. Likewise, National Register Bulletin 24 states that the goal of intensive survey is to document potential properties in sufficient detail to permit their evaluation.

We request to set up a meeting with you regarding your concerns after you have reviewed this letter and re-examined the report. Please contact Jerry Clause at 705-1483 to set up this meeting.