

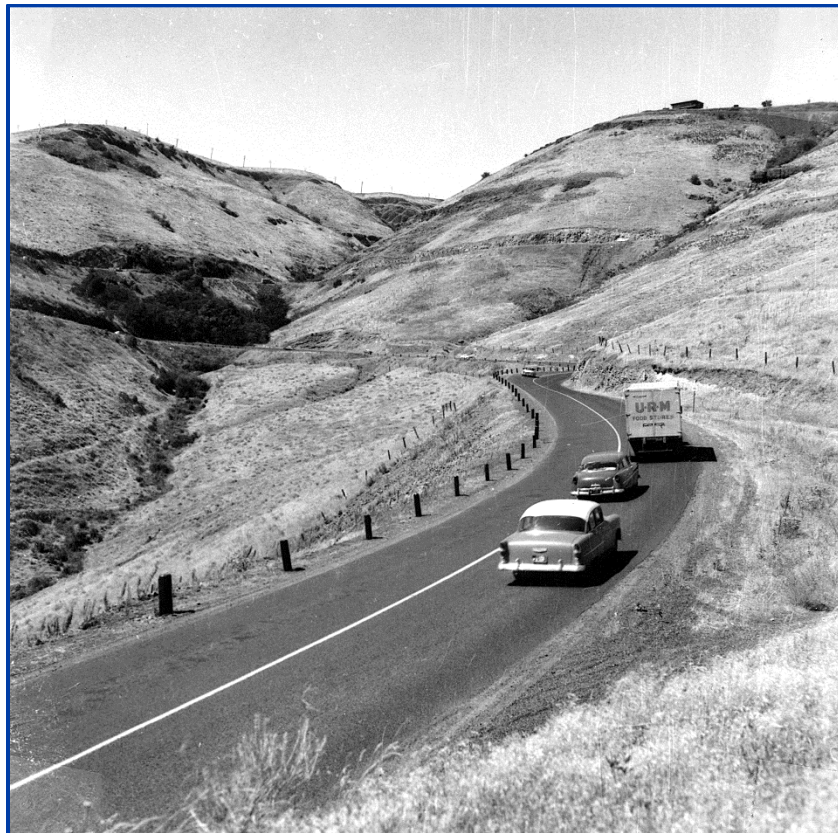
IDAHO TRANSPORTATION DEPARTMENT

RESEARCH REPORT

Historic Survey of Roads in Idaho's State
Highway System

Volume 2: Application of the National
Register of Historic Places Criteria for
Evaluation

RP 267



By

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Volume 2: Application of the National Register Criteria for Evaluation

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Table of Contents

	Page
EXECUTIVE SUMMARY	1
SECTION 1. PROJECT BACKGROUND.....	3
A. Purpose	3
B. Applicability	4
SECTION 2. RELATIONSHIP TO THE HISTORIC CONTEXT	5
SECTION 3. OVERVIEW OF STEPS 1 THROUGH 3 OF THE EVALUATION CRITERIA	7
SECTION 4. STEP 1: EVALUATING HISTORICAL SIGNIFICANCE OF ROADS IN IDAHO'S STATE HIGHWAY SYSTEM.....	8
A. Age.....	8
B. National Register Property Type	9
C. Criteria for Evaluation.....	9
D. Application of <i>Criterion A</i> to Roads.....	10
E. Areas of Significance Under <i>Criterion A</i>	12
(1) Transportation: Guidance on identifying significance.....	12
(2) Exploration/Settlement: Guidance on identifying significance	12
(3) Agriculture: Guidance on identifying significance.....	13
(4) Community Planning and Development: Guidance on identifying significance...	13
(5) Entertainment/Recreation: Guidance on identifying significance	14
(6) Conservation: Guidance on identifying significance	14
(7) Commerce and Industry: Guidance on identifying significance	15
(8) Military: Guidance on identifying significance.....	15
(9) Politics/Government: Guidance on identifying significance.....	15
F. Application of <i>Criterion C</i> to Roads.....	16
(1) Distinctive characteristics of a type, period, or method of construction	17
(2) Work of a master.....	17
(3) High artistic value.....	18
G. Criteria Considerations.....	19
H. Defining Level and Period of Significance	19
SECTION 5. STEP 2: ASSESSING HISTORIC INTEGRITY OF ROADS IN IDAHO'S STATE HIGHWAY SYSTEM.....	21
A. Identifying Essential Physical Features.....	21
B. Aspects of Integrity and Assessing Integrity	23
C. Assessing Historic Integrity – <i>Criterion A</i>	26
D. Assessing Historic Integrity – <i>Criterion C</i>	29

SECTION 6. STEP 3: COMPLETING NATIONAL REGISTER ELIGIBILITY RECOMMENDATIONS 32

List of Tables

Table 1 Evaluating historical significance under *Criterion A*..... 12

Table 2 Evaluating historical significance under *Criterion C: Engineering*..... 19

Table 3 Relevant aspects of historic integrity under *Criterion A*..... 27

Table 4 Examples of existing alterations that may affect assessment of historic integrity
under *Criterion A*..... 27

Table 5 Relevant aspects of historic integrity under *Criterion C*..... 29

Table 6 Examples of existing alterations that may affect assessment of historic integrity
under *Criterion C*..... 30

Cover photo: 1960 photo of traffic moving up the mountain pass on U.S. Highway 95. Image from the Idaho State Archives.

EXECUTIVE SUMMARY

Volume 2: Application of the National Register of Historic Places Criteria for Evaluation (Evaluation Criteria) of the *Historic Survey of Roads in Idaho's State Highway System* is the second component in the Idaho Transportation Department's (ITD's) effort to evaluate roads currently within Idaho's State Highway System. The purpose of the *Evaluation Criteria* is to provide a consistent and step-by-step approach to evaluating the historic significance and assessing integrity of individual roads currently within the State Highway System or segments of roads within the State Highway System to complete National Register of Historic Places (National Register) determinations of eligibility.

The first component, *Volume 1: Historic Context (Historic Context)*, provides an understanding of the physical development of Idaho's State Highway System and establishes historical contexts and related themes. This report links these historical contexts and themes to National Register areas of significance and the National Register Criteria for Evaluation to properly evaluate the historic significance and assess the integrity of individual highways or highway segments based on the standards of the National Register in a clear, concise, and replicable manner.

This report is arranged in five main sections that describe the methodology in which to apply the National Register Criteria for Evaluation to Idaho's State Highway System:

- *Section 1: Project Background* explains the ITD's purpose in undertaking this project and describes the purpose and applicability of the *Evaluation Criteria*. The section outlines the previous work on the project to complete the *Historic Context* and how this project helps comply with federal preservation regulations.
- *Section 2: Relationship to the Historic Context* describes the role of the *Historic Context* and how it should be used to apply this *Evaluation Criteria*. Reading and understanding the *Historic Context* is the first step when completing a National Register evaluation of a road currently within Idaho's State Highway System.
- *Section 3: Overview of Steps 1 through 3 of the Evaluation Criteria* provides
- *Section 4: Step 1: Evaluating Historical Significance of Roads in Idaho's State Highway System* considers the important themes identified in the *Historic Context* and relates them to National Register areas of significance under Criteria A, B, C, or D. It provides guidance to assist in further research for highway-specific contexts to evaluate if a road within the State Highway System possesses significance under one or more of the National Register criteria.
- *Section 5: Step 2: Assessing Historic Integrity of Roads in Idaho's State Highway System* provides guidance on establishing a clear understanding of why and when a road was historically important and what physical features are essential to convey significance and which aspects of historic

integrity are most important to convey this significance. This section provides guidance in assessing whether changes result in a loss of integrity under the relevant National Register criteria.

- *Section 6: Step 3: Completing National Register Eligibility Recommendations* provides guidance on how to delineate a historic boundary for a National Register-eligible road in the State Highway System and the role of the ITD and Idaho State Historic Preservation Office (SHPO) to make National Register determinations of eligibility.

SECTION 1. PROJECT BACKGROUND

The Idaho Transportation Department (ITD) is responsible for planning, building, and maintaining a statewide system of highways. The ITD carries out its mandates with funding from the state legislature and from federal grant-in-aid programs. As a state agency and recipient of federal funds, the ITD on behalf of the Federal Highway Administration (FHWA) must comply with Section 106 of the National Historic Preservation Act of 1966 (NHPA). One requirement of NHPA regulations is to consider possible effects of the ITD's activities on historic properties, which are defined by the National Park Service as buildings, sites, objects, structures, and districts that are eligible for listing or listed in the National Register of Historic Places (National Register). While bridges and buildings are well-known historic resources, over the last decade it has been understood that roads and highways also have historic significance. Highways, in their entirety, need to be considered during compliance with Section 106 of the NHPA and the FHWA and Idaho State Historic Preservation Office (SHPO) be offered an opportunity to comment on the findings. The ITD currently addresses small segments of highways on a project-by-project basis, an approach that is inefficient, outdated, and unsustainable.

The ITD received approval of the preparation of the multi-volume *Historic Survey of Roads in Idaho's State Highway System* as part of its ITD Research Program. *Volume 1: Historic Context (Historic Context)* was supported by the SHPO, FHWA, Local Highway Technical Assistance Council (LHTAC), and ITD. The purpose of the *Historic Survey of Roads in Idaho's State Highway System* is to provide a history of the ITD and its predecessor agencies, provide a history of the development of Idaho's State Highway System to serve as a basis for evaluating the historic significance, which is presented in the *Historic Context*. *Volume 2: Application of the National Register of Historic Places Criteria for Evaluation (Evaluation Criteria)* provides the process on how to evaluate a road currently within Idaho's State Highway System to determine whether it possesses significance and how to assess the integrity of individual highways or highway segments and complete National Register determinations of eligibility. Information gathered for the *Historic Context* may also be useful for interpretation of highways for public appreciation and to inform Idahoans of the crucial role that transportation has played in the growth and development of the state.

A. Purpose

The driving force behind this statewide historic highway context is the ITD and FHWA's need to comply with the NHPA. As a result, the focus of the Historic Context is on state highways under auspices of the ITD. The *Evaluation Criteria* provides the process in which to evaluate and document how highways may qualify as eligible for listing in the National Register. Results of the evaluation methodology developed using this historic context will facilitate ITD and FHWA compliance with federal requirements under Section 106 of the NHPA in *Volume 3: National Register Determinations of Eligibility*. The *Historic Survey of Roads in Idaho's State Highway System* is meant to primarily address roads currently within the State Highway System.¹

¹ The overall approach provided in the *Evaluation Criteria* may be used to complete National Register evaluations of roads under different classifications and under different jurisdictions if the appropriate historic contextual framework is established in which to assess historical significance.

The NHPA established a national policy for the consideration of historic properties in federal undertakings. A historic property is defined as any property listed in, or eligible for listing in, the National Register. The NHPA created the National Register, which is an official list of sites, districts, buildings, structures, and objects of national, regional, or local significance. To qualify for the National Register, a property generally must be 50 years old, be associated with a significant theme, and retain the characteristics that make it a good representative of properties associated with the past. The National Park Service within the U.S. Department of the Interior is charged with maintaining the National Register.

Historic highways may be afforded protection under the Section 106 regulations that were developed to implement the NHPA. Section 106 requires federal agencies and owners seeking federal assistance to review actions that may affect a property listed in, or eligible for, the National Register. The process includes identifying historic properties, assessing the effect of proposed actions on historic properties, and developing agreements that specify measures to deal with any adverse effects. To comply with Section 106, appropriate consultation among the federal agency, SHPO, Native American tribes, the public, and other interested parties (such as Certified Local Governments, historical societies and museums, and other individuals or organizations as appropriate) is required. The Advisory Council on Historic Preservation (ACHP), an independent federal agency in the executive branch, oversees the Section 106 review process.

To support the broader purpose of regulatory compliance for with regard to highways that are eligible for listing in the National Register, the agencies need to have clear information on which highways are historic properties and which are not. This report supports that purpose by developing a consistent process in which to apply the National Register Criteria for Evaluation to identify significant roads, evaluate integrity, and arrive at National Register determinations of eligibility.

B. Applicability

This *Evaluation Criteria* is applicable to roads within the State Highway System eligible to receive FHWA Federal-Aid Highway Program funds. Application of the *Evaluation Criteria* to roads not eligible for FHWA Federal-Aid Program funds, such as local or private roads, should be coordinated with the agency with jurisdiction and the SHPO. Idaho's Interstate Highway System falls under the Interstate Exemption adopted by the ACHP in 2005 in which all Interstate Highways are exempt from Section 106 review.

SECTION 2. RELATIONSHIP TO THE HISTORIC CONTEXT

The *Historic Context* is useful for interpretation of highways for public appreciation and to inform Idahoans of the crucial role transportation has played in the growth and development of the state. Individual sections provide national-level background on topics including the Good Roads Movement, federal funding, the Great Depression, World War II, and the development of modern highways, including the Interstate Highway System in the post-World War II (postwar) years. State-level transportation history trends and initiatives in Idaho are described within the context of these significant national developments and the history of roadbuilding and engineering is discussed, highlighting the establishment of a state agency to oversee construction and maintenance. For the purposes of this report, the contexts and themes identified in the *Historic Context* provide the basis for developing areas of significance and the application of a customized National Register Criteria for Evaluation for the state's highways based on the standards of the National Register.

The *Historic Context* provides the broad state-level historical context in which to evaluate whether Idaho's highways are associated with important events, themes, or patterns in transportation history or reflect engineering accomplishments under the relevant National Register areas of significance. The evaluation of significance for each highway will require further development of a road-specific research in which to understand how the highway relates to one of more important themes identified in the *Historic Context* under one of more areas of significance outlined in this *Evaluation Criteria*. Important themes of Idaho's highways relate to the following National Register areas of significance:²

- *Exploration/Settlement* – “the investigation of unknown regions; the establishment and earliest development of new settlements or communities.”
- *Transportation* – “the process and technology of conveying passengers or materials.”
- *Agriculture* – “the process and technology of cultivating soil, producing crops and raising livestock and plants,” focusing on road development specifically tied to agricultural activities.
- *Community Planning and Development* – “the design or development of the physical structure of communities,” focusing on road development within and immediately adjacent to communities primarily at the local level of significance.
- *Entertainment/Recreation* – “the development and practice of leisure activities for refreshment, diversion, amusement or sport,” focusing on tourist destinations and state and national parks.
- *Commerce* – “the business of trading goods, services, and commodities.”

² Descriptions and direct references of the National Register areas of significance adapted from U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Complete the National Register Registration Form* (1991), 40-41.

Section 2: Relationship to the *Historic Context*

- *Conservation* – “the preservation, maintenance, and management of natural or manmade resources,” focusing on the large areas of the state managed by the Forest Service and its effects on highway construction.
- *Industry*– “the technology and process of managing materials, labor, and equipment to produce goods and services,” applicable to roads that were constructed to provide access to or in support of industries, such as timber, mineral, and oil extraction and commercial fishing.
- *Military* – “the system of defending the territory and sovereignty of a people,” applicable to roads constructed to provide access to or in support of military facilities and activities.
- *Politics/Government* – “the enactment and administration of laws by which a nation, state, or other political jurisdiction is governed; activities related to political process.”³
- *Engineering* – “the practical application of scientific principles to design, construct, and operate equipment, machinery, and structures to serve human needs.”

The *Historic Context* provides the broad national and statewide contextual background and themes related to each of these areas of significance and is meant to be used with this *Evaluation Criteria*. Guidance on how to apply these areas of significance to individual highways is presented in sequential order in the following sections.

³ Roads that have been U.S. postal routes should be considered under this area of significance and not Communications. The road itself did not transmit information; rather, it served to facilitate the “the technology and process of transmitting information.” Further, since the U.S. Postal Service is a governmental body, U.S. postal routes would derive significance from the “the enactment and administration of laws in which a nation, State, or other political jurisdiction is governed” in the area of Politics/Government.

SECTION 3. OVERVIEW OF STEPS 1 THROUGH 3 OF THE EVALUATION CRITERIA

This *Evaluation Criteria* provides a three-step consistent process for agencies and cultural resource practitioners to apply the National Register Criteria for Evaluation to facilitate Section 106 compliance for roads in Idaho's State Highway System. This *Evaluation Criteria* is informed by the following publications: *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (commonly referred to as Bulletin 15); *National Register Bulletin: How to Complete the National Register Registration Form* (commonly referred to as Bulletin 16A); and the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*, including the Standards and Guidelines for Evaluation (36 CFR 61, 1983, as amended).

This *Evaluation Criteria* begins in Step 1, in which themes from the *Historic Context* are presented to assist in identifying the related National Register areas of significance, which then serve as guidance to identify the level of significance and period of significance. Roads found to possess significance are further evaluated in Step 2, which provides guidance to users of the *Evaluation Criteria* on how to identify essential physical features, the aspects of integrity that should be retained to convey significance, and how to assess historic integrity related to changes and alterations. The road's eligibility is then determined in Step 3.

SECTION 4. STEP 1: EVALUATING HISTORICAL SIGNIFICANCE OF ROADS IN IDAHO'S STATE HIGHWAY SYSTEM

For a property to possess significance, National Register guidance requires that it “must represent a significant part of the history, architecture, archaeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past.”⁴ For the purposes of this project, this *Evaluation Criteria* will be applied to roads, together with its component parts described below, within Idaho's State Highway System to determine eligibility following the application of the National Register Criteria for Evaluation customized to address this property type. This *Evaluation Criteria* is specific to roads within the State Highway System under the jurisdiction of the ITD. For the purposes of this *Evaluation Criteria*, the terms “road” and “highway” are used interchangeably.

This section discusses the sequence of steps used in evaluating significance of a highway. It begins with an overview of the National Register's 50-year age guideline and then a discussion on the property type and how to evaluate as linear resources. Next, this section considers the important themes identified in the *Historic Context* and relates them to areas of significance under National Register *Criteria A, B, C, or D*. Last, this section provides guidance to assist in further research for highway-specific contexts to evaluate if a highway possesses significance under one or more of the National Register Criteria. Evaluating significance also includes identifying the level of significance (national, state, or local) and the period of significance to determine when the highway was historically important.

A. Age

A property must be at least 50 years in age to qualify for listing in the National Register or meet the threshold of *Criteria Consideration G* for properties achieving significance within the past 50 years if it is of exceptional importance. The 50-year age guideline of the National Register allows historical perspective in which to evaluate the significance of properties. This timeframe may be extended to 45 years for the *Evaluation Criteria* to consider roads that will reach the 50-year age guideline of the National Register during future project development and construction.

If an exact date of road construction is not documented in primary research, reasonable evidence is required from readily available sources justifying whether the road is or is not at least 45 years in age. In evaluating if a road is at least 45 years in age, consider if the road or any segment of the road was originally constructed for vehicular use within this time frame. The date of construction and period of significance will be determined for highways identified as having potential significance in subsequent steps in the *Evaluation Methodology*. Roads that do not meet the minimum threshold of at least 45 years in age and in which there is no indication of exceptional importance do not meet National Register standards and do not qualify for listing in the National Register.

⁴ U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (1991), 7.

B. National Register Property Type

Highways are defined and evaluated as linear structures under the National Register Criteria for Evaluation. Highways may also be contributing or noncontributing resources within a historic district unrelated to Transportation (e.g., part of a downtown commercial historic district); however, evaluation of historic districts is beyond the scope of this study and the identification of historic districts is not addressed in the *Evaluation Criteria*.

The entire length of a highway should generally be evaluated for significance through the completion of road-specific research and analysis by an individual that meets the Secretary of the Interior's Professional Qualification Standards in the areas of history and/or architectural history. This *Evaluation Criteria* addresses roads currently within the State Highway System. The analysis is based on their history, association, design, and function within Idaho's State Highway System, not on their function and earlier history prior to inclusion into the State Highway System. For roads that predate the State Highway System, it may be important to gain an understanding of the earlier history and function prior to their inclusion into the State Highway System. This will assist in understanding why or how a road was originally constructed and what it served to connect before its inclusion within the system. This understanding may inform its potential for significance. If the *Evaluation Criteria* is being used for compliance with Section 106 of the NHPA for a federal undertaking (Section 106 compliance), the consideration of significance will likely require looking beyond the area of potential effects to understand and evaluate the road's historical importance. Research may reveal that discrete segments of a highway have historical associations or engineering significance that other portions of highway do not have; this may include bypassed segments or segments related to an earlier road history. If so, these sections of the highway may be identified and addressed segmentally, while the overall highway may possess significance for other themes or may not possess significance. The result may be that the entire highway and/or individual segments of the highway are found to possess significance.

Once a highway or segment of a highway is determined to possess significance, it is assessed for integrity to determine if it is eligible or not eligible following the guidance in the Section 4.

C. Criteria for Evaluation

The National Register employs four evaluation criteria: A, B, C, and D.

- *Criterion A: Events – Properties that are associated with events that have made a significant contribution to the broad patterns of our history.*
- *Criterion B: Persons – Properties that are associated with the lives of persons significant in our past.*
- *Criterion C: Design/Construction – Properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose component's may lack individual distinction.*

Section 4: Step 1: Evaluating Historical Significance of Roads in Idaho's State Highway System

- *Criterion D: Information Potential – Properties that have yielded, or may be likely to yield, information important in prehistory or history.*

For an Idaho highway to qualify for the National Register, significance will most likely be demonstrated through application of *Criteria A* and *C*. *Criterion B* association with a significant person and *Criterion D* for ability to yield information are unlikely to apply to highways from themes identified in the *Historic Context*. *Criterion B* requires that a road best exemplify a person's contributions to history; mere association with a road, or its design or construction, or involvement in a statewide program, would not render a road significant under *Criterion B*, unless an individual highway best represents their important contribution to history. Roads named for an important individual in which the recognition is commemorative in nature also do not qualify under *Criterion B*. The works of road engineers, designers, and artisans are typically not represented under *Criterion B* and are recognized under *Criterion C*. *Criterion D* is most often applied to archaeological properties, and roads in this study are in vehicular use and were constructed as above-ground property types and are not addressed in the *Historic Context*. Therefore, discussions for *Criteria B* and *D* are not included in this *Evaluation Methodology*. However, this does not preclude a road from being significant under one of these criteria should compelling information prove otherwise, in which case the National Register Criteria for Evaluation should be used to complete the evaluation.

This *Evaluation Methodology* addresses highways. Information in the *Historic Context* about early trails, military roads and wagon roads predate the establishment of the State Highway System and is provided for contextual background purposes. Early trails, military roads, and wagon roads were generally constructed in eras preceding the first State Highway System that was designated in 1914 and are not addressed. It is expected that former trails and wagon roads subsumed by a highway will have experienced substantial changes and alterations or obliteration resulting in a loss of integrity from a period of significance prior to 1914, rendering its ability to convey association with the theme of Exploration/Settlement extremely rare.

D. Application of *Criterion A* to Roads

Roads that have a direct and important association with single events, a pattern of events, repeated activities, or historic trends can possess significance under *Criterion A*. Transportation is the main area of significance under this criterion because all roads were built to convey people and goods. Mere association with Transportation as a representative example of the State Highway System may not always be sufficient to convey a direct and important association under this National Register area of significance. In this *Evaluation Criteria*, roads deriving significance under *Criterion A* in the area of Transportation are usually supported by historic themes that convey how the road functioned, the connections it provided, or its historic use that serve to distinguish it from other roads of a similar type, design and era.⁵ Guidance is provided below on events, programs or trends that may qualify as significant for singular importance under Transportation.

⁵ This approach does not preclude roads from solely deriving significance from a direct and important association in the area of Transportation; however, the statement of significance demonstrates the nature of the association with specific facts and should not be speculative in nature.

Often one or more supplemental areas of significance (e.g., Industry for access to mining for example) will better explain the historical purpose a road had in the conveyance of people and goods under Criterion A. The *Historic Context* identifies important historical themes that influenced the development of roads under *Criterion A* (e.g., agriculture, industry, etc.). A direct and important association with one or more supplemental areas of significance will possess significance under *Criterion A* for Transportation plus the supplemental area(s) of significance. Guidance is provided on supplemental areas of significance in which a highway can derive significance below.

The application of *Criterion A* to highways is summarized in Table 1.

Table 1. Evaluating historical significance under *Criterion A*

All roads are associated with Transportation; to demonstrate significance in Transportation only, a highway needs to have been constructed as a result of a program, project, or theme that transcends the regular actions of the highway department's road building efforts **and/or** have a direct and important association with at least one other supplemental area of significance and meet the requirements.

Transportation

Highways that only derive significance in the area of Transportation will typically be distinguishable from other roads of a similar type, design, and era – see Section E.1 below for additional guidance.

or

Transportation (historically functioned as a road within the State Highway System)

and

One or more supplemental areas of significance:

- Agriculture – see Section 3.E.(2) for additional guidance
- Community Planning and Development – see Section 3.E.(3) for additional guidance
- Entertainment/Recreation – see Section 3.E.(4) for additional guidance
- Conservation – see Section 3.E.(5) for additional guidance
- Industry – see Section 3.E.(6) for additional guidance
- Military – see Section 3.E.(7) for additional guidance
- Politics/Government – see Section 3.E.(8) for additional guidance

Requirements:

- Association must be demonstrated as important in one or more areas of significance
- Association must be direct and documented and not be speculative or incidental

The section below provides supplemental areas of significance and guidance on identifying significance.

Under *Criterion A*, the connection a road historically provided is often of importance. When considering connectivity, current or past functional classification definitions of the FHWA or the ITD are not paramount; rather, the evaluation should consider how the road historically functioned to provide a connection of

Section 4: Step 1: Evaluating Historical Significance of Roads in Idaho's State Highway System

national, state, or local importance under one of more areas of significance during the period(s) of significance. Evaluations should explicitly discuss how or why its connection was important under the area(s) of significance and discuss the historic environment during the period(s) of significance.

E. Areas of Significance Under *Criterion A*

Areas of significance under *Criterion A* and guidance on identifying significance along with examples of single events, a pattern of events, repeated activities, or historic trends from the *Historic Context* are provided below. Note that examples of themes from the *Historic Context* are provided under each area of significance for illustrative purposes and this reference does not denote that an associated highway is significant; the event, activity or trend must be demonstrated to be important and the highway must have a direct association through highway-specific research and evaluation. Each area of significance includes guidance on thresholds to establish a direct and important association.

(1) Transportation: Guidance on identifying significance

This area of significance focuses on major trends to improve Idaho's State Highway System. All roads have an association with Transportation because they were constructed to serve transportation needs and to convey people and goods. As a result, typically one or more supplemental areas of significance (e.g., agriculture, industry, etc.) will better explain the historical importance a road had in the conveyance of people and goods under *Criterion A*. A direct and important association with one or more supplemental areas of significance will confer significance for a highway under *Criterion A* as described above.

This approach does not preclude roads from solely deriving significance from a direct and important association in the area of Transportation. The statement of significance must demonstrate the nature of the association with specific facts that distinguish its role and history from other roads of a similar type, design, and era. Moreover, the statement of significance should not be speculative in nature. For example, a highway may possess significance under Transportation only where its construction was the direct result of an event, program, project, or trend that transcends the regular actions of the highway department's road building efforts, such as the initial group of highways designed in 1914 and early expansions through 1920 that represent the initial and formulative efforts of the highway department's mission to improve the state's vehicular transportation network. Other examples that may transcend the regular actions of the highway department may include a prominent project, such as the monumental ongoing effort of constructing a north/south connection, or associations with programs like the Strategic Highway Network.

(2) Exploration/Settlement: Guidance on identifying significance

This area of significance focuses on road development that led to the opening of previously inaccessible areas of the state and/or the establishment and earliest development of new settlements or communities, rather than on creating connections between multiple communities. Roads that individually played a crucial or singular role in the investigation and/or opening of previously inaccessible regions may have a direct association with an important local trend related to Exploration/Settlement. Generally, this *Evaluation Criteria* addresses the road's role, function, and use within the State Highway System; however, roads may have earlier histories, prior to their designation within the State Highway System, that need to be taken into

account when considering their development and inclusion in the State Highway System. Possible examples may include early named highways, overland trails, and roads from the territorial period or the early years of the State Highway Commission. Such roads may have resulted from earlier singular routes or several routes that converged or traversed difficult terrain such as mountain passes.

(3) Agriculture: Guidance on identifying significance

This area of significance applies primarily to periods when highways focused on supporting the agricultural interests. For example, the Federal Aid Highway Act (FAHA) of 1944 provided new funding for construction of secondary roads (also known as feeder roads, which included farm-to-market roads). Highways that were constructed or substantially improved to serve as the main regional route providing direct access between agricultural markets and areas of the state with important agricultural production may possess significance.

Roads that merely provided access to individual farms, or access to areas of typical agricultural production not deemed important in state history, or one of many roads linking an agricultural region to its market would not possess significance under this area of significance.

(4) Community Planning and Development: Guidance on identifying significance

This area of significance focuses on road development within and immediately adjacent to communities, rather than on creating connections between multiple communities. Roads that individually played a crucial or singular role in the development pattern within a community may have a direct association with an important local trend related to Community Planning and Development. Possible examples of the type of highways the *Historic Context* identified are discussed below.

Due to increasing traffic speeds and volume, the agency advocated for more expert treatment of intersectional design, truck lanes, separations, interchanges, and channelization, and seeing that much future work would focus on municipalities (as opposed to rural projects), the department anticipated detailed analyses of intersections, medians, curb and gutter design, storm sewer problems, and relocation of utilities. As a result, in the late 1950s the highway department completed the state's first route analysis and subsequent projects, which may have affected the physical development pattern within a community.

In the early 1970s the national Traffic Operations Program to Increase Capacity and Safety (TOPICS) program, created as part of the FAHA of 1968, supported additional highway department safety efforts. The program designated certain municipal streets as part of the federal-aid highway system so they could receive federal funding. This aid covered complex traffic engineering with turning lanes, reversible lanes, and channelization. As a result, in the early 1970s TOPICS projects by the highway department may have affected the physical development pattern within a community.

Roads that merely addressed population growth, improved traffic congestion, or provided more direct connections within a community are not an indistinguishable part of a larger overall development patterns of community development and would not possess significance under this area of significance.

Section 4: Step 1: Evaluating Historical Significance of Roads in Idaho's State Highway System

To demonstrate significance under this area, documentation such as plans or government records should identify the specific role of the highway to improve the physical structure of a community and should distinguish its role as important to the community.

(5) Entertainment/Recreation: Guidance on identifying significance

This area relates to the large amount of federally or state-owned land managed for recreational purposes such as state and National Parks. This area of significance focuses on the construction, use, and/or improvement of highways for outdoor recreational activity, including tourism, access for hunting and fishing, camping, and related recreational activities.

For example, the context identifies many tourist destinations in the state and identifies the role of national and regional auto trail associations who sought improvements on the state's highways through partnering with local boosters in the communities along the route to promote tourism.

Highways associated with these and other related themes many have a direct association with an important statewide, regional, or local trend or program related to Entertainment/Recreation if its construction or improvement as a highway provided early or direct and singular public access to recreational activities.

Roads that provided one of several connections or points of access to recreational activities or whose primary purpose relates to another area of significance would not possess significance under this area of significance. Roads that merely provided connections or access for regularly scheduled maintenance, security, or monitoring activities associated with recreational areas would not demonstrate significance under this area of significance.

(6) Conservation: Guidance on identifying significance

This area relates to the large amount of federally or state-owned land in the state that are managed for natural resource conservation such as National Forest Service land and Wilderness Areas. This area of significance focuses on the construction, use, and/or improvement of highways for the management of the state's natural resources.

For example, the context provides details on the relationship between the highway department, Bureau of Public Roads (BPR), and the Forest Service for the funding and construction of the highways and Forest Highways. The context also discusses and identified highways that provide access to units of the National Park System.

Highways associated with these and other related themes may have a direct association with an important statewide, regional, or local trend or program related to Entertainment/Recreation if its construction or improvement as a highway provided early or direct and singular public access to an area deemed critical for the management of natural resources.

Roads that provided one of several connections or points of access to natural resource management areas or whose primary purpose relates to another area of significance would not possess significance under this

area of significance. Roads that merely provided connections or access for regularly scheduled maintenance, security, or monitoring activities associated with conservation management areas would not demonstrate significance under this area of significance.

(7) Commerce and Industry: Guidance on identifying significance

This area of significance focuses on roads directly related to Idaho's businesses and industries, such as mining, long-distance trucking, and manufacturing. The context identifies numerous businesses and industries and highlights other state agencies such as Idaho Department of Commerce and Development, which guided planned highway development. A direct association with an important statewide, regional, or local trend or program related to Industry may be shown for roads that were constructed or improved to provide a primary connection to convey labor and/or goods and or materials to processing centers or provided a critical link that led to an important phase of expansion of the operations of a business or an industry. Roads that provided access and connections to existing industrial activities for regularly scheduled maintenance, security, or delivery/shipments would not demonstrate significance under this area of significance.

(8) Military: Guidance on identifying significance

Early military activities in Idaho during the late 1800s resulted in the construction of numerous roads. For example, the War Department expended \$230,000 to construct the Mullan Road to provide an alternative to the Oregon Trail. Portions of this military road, or others like it, may have subsequently been subsumed by a highway. For these early military roads, it is expected they will have experienced substantial improvements resulting in a loss of integrity from the period of significance that relates to their use as a military road, so that ability to convey association with the theme of Military would be extremely rare.

This area of significance may apply to Idaho's State Highway System, particularly leading up to, during, and after World War II, including the Cold War. Section 7, World War II and its Effects (1941-1955) of the *Historic Context* includes details on roads deemed critical for national defense, road building projects, and areas of the state with natural resources deemed critical for the war effort, along with other themes.

A direct association with an important statewide, regional, or local trend or program related to Military may be shown for roads if they were established or improved access to a mission critical military facility or facilitated specific activities or provided access to facilities or materials deemed critical for national defense.

Roads that provided routine access would not possess significance under this area of significance. Roads within the boundaries of military facilities should be evaluated as part of the larger installation.

(9) Politics/Government: Guidance on identifying significance

This area of significance applies to roads constructed as a direct result of an important government program that offered assistance for road funding and policy.

This area of significance may apply to Idaho's State Highway System, particularly during the 1930s. Section 6, The Great Depression and the New Deal (1930-1940) of the *Historic Context* includes details on federal

Section 4: Step 1: Evaluating Historical Significance of Roads in Idaho's State Highway System

work-relief programs and projects that affected roads. A highway may possess significance under *Criterion A: Government/Politics* for an association with Depression-era federal work-relief programs aimed to alleviate unemployment and improve transportation infrastructure. Enacted in the 1930s as part of New Deal legislation of the Roosevelt administration, these programs provided funding for road and bridge building and improvements that employed thousands of unemployed people in Idaho and represent an important trend in twentieth-century government programs. Numerous projects completed under New Deal funding or labor were completed in the state during the 1930s. To demonstrate significance, a direct association must be made by establishing the project received funding and/or labor from a Depression-era, federal work-relief program. Such evidence will typically be demonstrated by listing the Depression-era, federal work-relief program and project number or other relevant details so the association is supported by documentary evidence and is not speculative.

Idaho includes large areas of federal lands and Native American reservations. The BPR funded, designed, and oversaw construction on various types of roads on federal lands such as Forest Highways (Conservation), National Parks and Monument Roads (Entertainment/Recreation), National Military Reservation Roads (Military), and roads on Native American reservations. In many cases, these highways are expected to have a stronger association to other areas of significance listed in parenthesis. Other roads that may related to this area of significance include State Park Roads. For these roads, this area of significance is expected to only apply in rare cases where the road is in the State Highway System and in which the program and the road transcend the regular actions of government road building efforts. Idaho's highway markers program is a theme identified in the *Historic Context* that may be evaluated under this area of significance.

Roads associated with routine government programs would not possess significance under this area of significance. Individual roads constructed as a direct result of a historically important federal or state program that are distinctive within that program may have a direct association related to Politics/Government.

F. Application of *Criterion C* to Roads

Criterion C applies to roads that reflect important design features and construction practices. Roads can convey advances in engineering through their application of design principles and methods of construction. Idaho's earliest roads were generally constructed of graded earth, and more complex designs, such as water bound macadam or concrete pavement, were highly uncommon in the 1910s. Earth surfacing remained common into the 1920s, although gravel was provided where possible. From the late 1920s onward, 'dustless' surfacing incorporated bituminous/asphaltic material applied to or mixed into a crushed rock or gravel surface. Over the course of the 1930s, the application of bituminous surfacing was a major focus, and by 1940 accounted for more than half the total State Highway System mileage. The road system was upgraded and standardized after World War II, at which time the use of state or federal standards became widespread.

The *Historic Context* provides topics and themes related to roadway engineering and construction at the end of each chapter. This information provides information related to construction techniques; advances

in maintenance, traffic, and safety engineering; and advances in materials research that occurred in the state. It also lists projects that may demonstrate evidence of engineering and/or construction features. Examples referenced in the *Historic Context* do not denote that an associated highway is significant under this criterion. Establishing significance for engineering will require highway-specific research to review plans and other relevant documents to demonstrate how a variation, evolution, or transitions was important in the history of road building. Such evidence will typically be demonstrated by referencing the plan and/or other relevant details so that the association is supported by documentary evidence and is not speculative.

To possess significance under *Criterion C*, a road needs to reflect design features or construction practices that were the result of uncommon, early, or specific contributions or advances in the application of engineering principles. For roads in Idaho's State Highway System, these thresholds can be achieved if a road exemplifies one or more of the following requirements as outlined in the National Register Criteria for Evaluation under *Criterion C*:

- Embodies distinctive characteristics of a type, period, or method of construction.
- Represents a distinctive work of a master.
- Possesses high artistic value.

(1) Distinctive characteristics of a type, period, or method of construction

To identify roads that are significant for embodying the distinctive characteristics of a type, period, or method of construction, three considerations apply:

- Patterns of features common to a particular road type.
- Variation of road features.
- Evolutions and transitions in road design and construction.

All roads have the ability to display patterns of features common to their particular road type (such as design standards from the BPR and the highway department) and can therefore generally serve as representative examples of the application of road design standards under *Criterion C*. Under this Evaluation Criteria, mere representation of particular road design standards is alone not sufficient to convey significance. A road will possess significance only if it represents its type and exhibits important design and/or construction features such as variation of road features, evolution or transition in road design and construction to distinguish itself from other roads of the same type, or is a surviving example of a rare road type (see Table 2).

(2) Work of a master

This consideration takes into account evidence of a master's (engineer, designer, fabricator, or builder) important work. A road recognized for its significance as the work of an engineering master needs to be representative of a particular phase of the master's career. Since roads largely display standardized design and construction methods, the influence of the work of a master is not expected to be demonstrated in Idaho's State Highway System. No evidence was found through *Historic Context* development to suggest application of this area of significance.

Section 4: Step 1: Evaluating Historical Significance of Roads in Idaho's State Highway System

(3) High artistic value

This consideration takes into account roads that were designed with an outstanding aesthetic treatment(s). Most roads are utilitarian, with little or no application of aesthetic treatments. In general, for a road to demonstrate aesthetic treatment it would have to follow an overall design aesthetic, likely applied by a landscape architect who integrated roadway siting with designed road-related features, such as walls or landscaping. The *Historic Contexts* suggests that aesthetic treatments were not frequently applied to Idaho's State Highway System, with the possible exception of roadside beautification programs and projects (completed under a Depression-era, federal work-relief program or the Highway Beautification Act of 1965), which may be evaluated under *Criteria A* and/or *C* depending on its significance.

Table 2. Evaluating historical significance under *Criterion C: Engineering*

Identifying two or more important engineering or distinctive design features

Most roads reflect patterns of features common to a particular road type under distinctive characteristics of a type, period, or method of construction (see Section 3.F.(1)). To possess significance a road must **also** reflect other important or distinctive design features and/or construction practices and meet the requirements under this criterion or be a surviving example of a rare road type.

Patterns of features common to a particular road type.

AND

One or more distinctive characteristics of a type, period, or method of construction, which may include:

- ***Variation of features***

This consideration takes into account variations in the application of road design principles and construction practices, such as choices in the use and availability of materials and technology. This may be expressed as innovative or complex engineering solutions employed to address unusual or challenging site conditions. Examples may include such features as segments of road that involved extensive earth moving (cut and fill), blasting rock for the construction of tunnels to traverse mountainous areas, or constructing segments of roads with new types of bituminous surfacing. For a road to possess significance under *Criterion C*, the solutions need to address issues that transcend the normal challenges of road building within the state. Roads that exhibit typical or modest variations of standards in highway design and construction would not possess National Register significance. This consideration also takes into account examples of rare road-building technology or features.

- ***Evolutions and transitions***

This consideration takes into account the initial application of advances that had a long-standing impact on the field of road engineering and were experimental in nature or served as an important departure from typical design principles or practices of the time. This may be expressed in an innovative use of materials, progression of design principles, or development of technologies or building practices that transcend typical standards in highway design of the time. Examples may include early road segments improved to all-weather standards or departures in typical road design to accommodate permafrost.

Requirements:

- Exhibits evidence of engineering design and/or construction features that serve to distinguish it from other roads of the same type and classification. Design or construction features must be demonstrated as important in road engineering or the road segment must be a surviving example of a rare road type.

To evaluate the significance of a highway, research and a specific historic context must be developed to understand how a road's engineering features relate in comparison to other roads and descriptions of the importance of the design or construction features in a statement of significance.

G. Criteria Considerations

In identifying areas of significance, National Register guidance provides for a variety of criteria considerations to cover types of properties that are not usually considered for National Register listing. *Criteria Consideration G: Properties That Have Achieved Significance Within The Past 50 Years*, may be applicable to roads when defining the period of significance (discussed below). *Criteria Consideration G* states that a property achieving significance within the past 50 years must be of exceptional importance to be considered National Register eligible. For the purpose of this *Evaluation Methodology*, *Criteria Consideration G* only needs to be addressed when applicable. For Section 106 compliance evaluation purposes, roads that will reach the 50-year threshold during the development and construction of a project do not need to meet *Criteria Consideration G*. Roads that achieved significance less than 50 years ago need to meet the requirements of *Criteria Consideration G*. Roads with a period of significance that is largely encompassed within the recent past (less than 50 years) have to demonstrate exceptional significance through the application of *Criteria Consideration G*. Roads with a period of significance that ends only a few years outside the 50-year period may not be required to have exceptional significance. For each area of significance, the appropriate period of significance should be identified based on the specific historic context and described in a statement of significance. Additional National Register criteria considerations are not expected to apply to roads.⁶

H. Defining Level and Period of Significance

Assessing significance includes the identification of both the level and period of significance based on an understanding of the road's area(s) of significance. Information learned about the road while evaluating significance will assist in identifying the appropriate level and period of significance. Roads can derive significance from important historical associations or feats of engineering in national, state, or local history under *Criterion A* or *Criterion C*. For each area of significance, the appropriate level of significance (national, state, or local) should be identified based on the specific historic context and described in a statement of significance. For the purpose of this *Evaluation Methodology*, local significance is defined as relating to the significance of an individual community, county, or specific region within the state. Under *Criterion A*, the period of significance in the area of Transportation will be concurrent with the period identified for the supplemental area of significance.

⁶ *Criteria Consideration B* for moved properties and *Criteria Consideration E* for reconstructed properties are not expected to apply because these considerations would generally be referencing the construction of new segments of road that would not possess significance or retain historic integrity.

Section 4: Step 1: Evaluating Historical Significance of Roads in Idaho's State Highway System

The *National Register Bulletin: How to Complete the National Register Registration Form* states the period of significance is the "length of time when a property was associated with important events, activities, or person, or attained the characteristics which qualify it for National Register listing." The period of significance for a road may span many years to encompass its continued use and association with the area of significance under *Criterion A*. Under *Criterion C: Engineering*, the period of significance for roads may be relatively short, as it relates to the road's date of construction. A road with more than one area of significance may have varied (overlapping or discontinuous) periods of significance representing the time associated with the events or characteristics of significance.

Roads that are found to possess significance move onto Step 2. Roads that do not possess significance at the end of Step 1 do not meet the National Register Criteria for Evaluation and are not eligible for listing in the National Register unless additional or new information is learned that affects their ability to meet the Evaluation Criteria outlined in Step 1.

SECTION 5. STEP 2: ASSESSING HISTORIC INTEGRITY OF ROADS IN IDAHO'S STATE HIGHWAY SYSTEM

To be eligible for the National Register, a road must not only possess significance, but also retain historic integrity. According to the National Register guidance, historic integrity is “the ability of a property to convey its significance.”⁷ This section provides guidance on establishing a clear understanding of why and when a road was historically important and what physical features are essential to convey significance and which aspects of historic integrity are most important to convey this significance. For this reason, the identification of essential physical features will take into account features present during the period of significance along the entire road (or segments of road) identified as significant.⁸ Assessing integrity can be focused more narrowly on the segment of road or its entire length. In assessing historic integrity, a road or segment of road with significance needs to convey the essential physical features and be of a distance long enough to provide a sense of time and place and travel experience related to the period(s) of significance. Guidance is provided in assessing whether changes result in a loss of integrity under the relevant National Register Criteria.

A. Identifying Essential Physical Features

Essential physical features are those features that were present during the period of significance and are required to understand a road's significance.⁹ According to the National Register guidance, “the essential physical features are those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance).”¹⁰

A road is a linear structure that consists of a roadbed and roadbed-related features. Each road will derive significance from a unique set of factors and will require evaluation on a case-by-case basis to determine which individual roadbed and roadbed-related features are essential to understand the significance under *Criterion A* and/or *Criterion C*. Identification of essential physical features should consider those features present during the period of significance for the entire length of road or road segment with significance.

For roads with historical significance under *Criterion A*, the essential physical features will often demonstrate their historic function of providing an important connection between two or more destinations related to the road's significance. Essential physical features that convey a road's historic function will typically include the number of travel lanes, the embankment, and the overall alignment that define the road

⁷ U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (1991, rev), 44.

⁸ The identification of essential physical features requires consideration beyond the APE when the road or road segment found to possess significance extends beyond the APE when using this *Evaluation Criteria* for Section 106 compliance.

⁹ Physical features not present during a road's period of significance cannot be essential physical features.

¹⁰ U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (1991, rev), 46.

Section 5: Step 2: Assessing Historic Integrity of Roads in Idaho's State Highway System

corridor. For roads with historic significance under *Criterion C*, the essential physical features will typically demonstrate the important road design or construction related to engineering significance. Essential physical features that most often exhibit distinctive engineering will typically be the road's physical components, including the embankment, surface material, and the grade and curvature of the alignment, in addition to any important roadbed-related features. Roadbed and roadbed-related features determined not to be necessary in understanding a road's significance should not be identified as essential physical features.

The definitions of roadbed and roadbed-related features listed below do not directly reference current or past technical engineering terms and are intended for use in the application of this *Evaluation Methodology* in assessing National Register eligibility to promote a common terminology and consistency among its users.¹¹

Typically, the essential physical features of the roadbed of a highway will include features within the groups listed below. Each group includes related features that work together to comprise a physical feature that is essential for it to be recognizable and convey its historic character for its period of significance.

- *Surface* – identifiable components that work together to comprise the physical form and materials of the roadbed. The physical form includes the roadway width, number of travel lanes, shoulders and major features in the right-of-way essential in understanding its function and significance. Materials under this feature relates to the visible elements of travel surface and shoulders.
- *Embankment* – the raised foundation of materials built to support the roadway components consisting of a berm and slope.
- *Alignment* – the grade (vertical alignment) and curve (horizontal alignment) of the roadbed.

Roadbed-related features are integrated into or located immediately adjacent to the roadbed and may include:¹²

- Bridges, viaducts, and grade separations (overpasses or underpasses)
- Tunnels
- Retaining walls
- Intersections
- Interchanges
- Drainage features (culverts, gutters, drains, ditches, or dikes)

¹¹ Since technical engineering terms have evolved over time, the use of current technical engineering terms may not reflect the historical application of these terms on road design or standards. As a result, definitions of the roadbed and roadbed-related features are provided to assist in creating a common terminology among transportation engineers, cultural resource professionals, and other users for use in the application of the *Evaluation Methodology* in assessing National Register eligibility.

¹² In some cases, road-related features may be individually significant for engineering in addition to contributing to the significance of a road.

- Livestock and wildlife bridges and underpasses
- Specially engineered features
- Traffic signals, signage, or mile markers
- Lighting
- Safety barriers (such as guard rails, curbs)
- Parking areas (such as on street parking areas immediately adjacent to the travel lanes)
- Landscaping
- Fences
- Overlooks and turnouts (connected to road)
- Weigh stations (connected to road)
- Sidewalks and paths

With the exception of bridges and tunnels, roadbed-related structures were typically designed to function as part of the overall highway and lack sufficient size and scale to alone convey the historical significance. As such, they will typically be evaluated along with the roadbed segment and are not likely to be individually eligible for the National Register without an intact roadbed.

B. Aspects of Integrity and Assessing Integrity

Historic integrity is comprised of seven aspects, which are outlined below and applied to segments of historic roads within the APE.¹³

- *Design* – The combination of elements that create the physical form and plan of a road from the period of significance. Among other things, a road's design encompasses its grade (vertical alignment) and curve (horizontal alignment).¹⁴
- *Materials* – The physical composition of the road from the period of significance.
- *Workmanship* – Elements that reflect physical evidence of the labor and skill of artisans or master craft persons from the period of significance. Due to standardization and the widespread use of mechanization in road construction, this aspect of historic integrity is rarely expected to apply to Idaho's roads.
- *Location* – The spatial location of the road from the period of significance.

¹³ Adapted from U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (1991, rev), 44-45.

¹⁴ The term design is defined here as an aspect of historic integrity and is not intended to be a technical engineering definition.

Section 5: Step 2: Assessing Historic Integrity of Roads in Idaho's State Highway System

- *Setting* – The elements in the environment that comprise the character of the surroundings of the road during the period of significance. The physical features that comprise the setting may vary along the length of a road.
- *Feeling* – Results from the presence of elements that evoke and express the historic character of the road during the period of significance.
- *Association* – The direct link between the road and its historic significance, demonstrated by the presence of sufficiently intact features that can convey this relationship to an observer.

Assessing historic integrity requires linking the information known about the road's significance with its present appearance and assessing its ability to visually convey its significance. The assessment of historic integrity for roads deriving significance under *Criterion A* will differ from the assessment for integrity under *Criterion C*, because the themes a road represents will vary. If a property is significant under both *Criteria A* and *C*, integrity should be assessed separately to determine if the road retains the essential physical features that were identified under the associated area of significance under each criterion.

If the essential physical features of the road are present, the road segment being evaluated must also demonstrate most if not all of the aspects of integrity vital to conveying the road's significance and historic identity. According to National Register guidance, "It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity."¹⁵ Road segments that do not exhibit the essential physical features of the overall road cannot convey significance and are not eligible. Guidance on the identification and consideration of the seven aspects of integrity related to *Criteria A* and *C* is provided in Sections 4.C and 4.D.

When considering integrity, alterations or changes to the road should be identified and determined if they occurred within the road's period(s) of significance as defined for the area of significance being assessed. The assessment needs to determine if the changes impact essential physical features and the degree the changes diminish the aspects of integrity. The size and scale of the change needs to be considered to determine if the change is severe enough to diminish particular aspects of integrity important to the significance. Alterations or changes made within the period of significance and outside the period of significance should be considered. Not all alterations, including those to essential physical features, will diminish a road's historic integrity to the degree that it can no longer convey significance.

Bypassed or abandoned segments of highways due to realignments during the period of significance will not necessarily constitute a loss of integrity. The realignment and/or the bypassed alignment may possess significance if they retain their essential physical features from their period of significance and may retain those aspects of integrity that are important. Bypassed alignments of roads not currently within the State Highway System but that were formerly within the State Highway System may possess historical

¹⁵ U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (1991, rev), 46.

Volume 2: Application of the National Register Criteria for Evaluation

significance, but because the focus of the study is on roads currently within the State Highway System, these are not addressed under this *Evaluation Criteria*. In these cases, information on the previous alignment should be noted in the National Register determination of eligibility of the current alignment.

Generally, abandoned bypassed segments are given greater allowance for integrity of design due to the degradation associated with natural processes such as erosion, washouts, and encroaching vegetation, but must have sufficient length to convey a sense of connectivity from the period of significance. Sufficient length is demonstrated by having an uninterrupted view of the roadbed within the viewshed that serves to provide a sense of automobile travel from the period of significance and a sense of the original connection the road provided. Early alignments reflect lower travel speeds before efforts to flatten the grade and straighten the curves and may require less length, while later alignments constructed to accommodate higher travel speeds result in flatter grade (horizontal alignment and embankment) and straighter curves (vertical alignment and embankment) and may require more length to retain integrity by providing a sense of time and place and travel from the period.

In addition to assessing individual changes, the cumulative effect of multiple changes to a variety of road features, including essential physical features, may collectively diminish important aspects of historic integrity and hinder a road's ability to convey significance. If there is a loss of the essential physical features and a loss of integrity to the level that the historic identity can no longer be conveyed, then the road no longer retains integrity and is not eligible. Roads deriving significance from more than one area of significance may have separate periods of significance (overlapping or discontinuous) that need to be considered separately for integrity.

Typical alterations to a road that may result in changes to one or more essential physical features and impact historic integrity include:

- Widening of the existing roadbed outside the period of significance; examples may include the addition of travel lanes to the existing travel lanes, the addition or change in shoulders (widening or change of material), the addition of a median strip changing undivided travel lanes to divided travel lanes, and/or the physical widening, raising, or lowering of the embankment. The construction of a new roadbed adjacent or parallel to the existing roadbed outside the period of significance with no direct physical changes to the existing roadbed under evaluation needs to be assessed on a case-by-case basis based on the reason(s) why a roadbed derives significance and how this change impacts integrity. Further guidance is provided below.
- Realignment or straightening or changes to grade, curvature, or alignment and shortening to the existing roadbed outside the period of significance.
- New surface material (changes to road surface can range from an alteration in road surface type [e.g., gravel to hard pavement] or in-kind replacement due to reconditioning or replacement) to the existing roadbed outside the period of significance.

Section 5: Step 2: Assessing Historic Integrity of Roads in Idaho's State Highway System

- Replacement, addition, or change of roadbed-related features such as bridges and culverts to the existing roadbed-related features outside the period of significance.

If a road segment retains essential physical features that enable it to convey its significance, then the road segment should be considered eligible. If the road does not retain essential physical features to the degree necessary to convey its historic significance, then the segment does not retain integrity and therefore is not eligible.

As noted above, the aspects of integrity needed to convey significance are expected to vary for *Criterion A* and *Criterion C* because the reason for significance will be different. Guidance for each criterion is provided below on the identification of the most important aspects of integrity and the consideration of alterations to assess integrity.

C. Assessing Historic Integrity – *Criterion A*

Criterion A relates to the significance of a road gained through its historical associations, which is often demonstrated by the connection it provided. As previously described, travel lanes, the embankment, and overall alignment are typically essential physical features of the roadbed needed to convey the important connection a road provides and its significance under *Criterion A*.

Under *Criterion A*, often the connection a road historically provided is of importance. When considering connectivity, current or past functional classification definitions of the FHWA or the ITD is not paramount. Rather, the evaluation should consider how it historically functioned to provide a national, state, or local important connection under one of more areas of significance during the period(s) of significance; whether this connection is still exists or can be conveyed by the road; and whether the road is of a distance long enough to provide a sense of time and place and travel experience related to its historic environment during the period(s) of significance.

Location, design, and association are typically the most important aspects of historic integrity in conveying a road's historical association. As a result, retention of these are typically required for a road to be eligible under *Criterion A*. The other aspects of integrity are also important under *Criterion A* and most should be retained to convey significance. Table 3 lists the relative importance of each aspect of integrity.

Table 3. Relevant aspects of historic integrity under *Criterion A*

Aspect of historic integrity	Importance under <i>Criterion A</i>
Design	Most important to convey significance – should be recognizable from the period of significance
Materials	Least important to convey significance – if present will assist in conveying significance
Workmanship	Least important to convey significance – if present will assist in conveying significance
Location	Most important to convey significance – should be recognizable from the period of significance
Setting	Important to convey significance – should be recognizable and be retained together with other aspects to convey significance
Feeling	Important to convey significance – should be recognizable and be retained together with other aspects to convey significance
Association	Most important to convey significance – should be recognizable from the period of significance

This guidance generally applies to roads with significance under *Criterion A*; however, the assessment of integrity needs to consider the particular area of significance and essential physical features for each road and will vary for each road depending on the type of changes. Alterations need to be assessed on a case-by-case and cumulative basis to determine the overall impact of these changes on the road's historic integrity and if they obscure or detract from the ability of the road to convey its historic identity. Table 4 provides guidance on the assessment of integrity for a road under *Criterion A*.

Table 4. Examples of existing alterations that may affect assessment of historic integrity under *Criterion A*

Examples of typical alterations (existing)	Assessment of historic integrity
Realignment of portions of the existing roadbed outside the period of significance	<p>Realignment might have resulted in changes to essential physical features of the current roadbed, such as travel lanes, embankment and alignment, and roadbed-related features. Changes of sufficient scale might have resulted in a loss of one or more aspects of integrity, such as design, location, association, feeling, and setting.</p> <p>Realignment may also have resulted in bypassed segments that may retain essential physical features that were present during the period of significance. Such bypassed segments may retain aspects of integrity such as design, location, setting, feeling, and association.</p> <p>If the essential physical features and other road features were altered to the degree that they cannot convey significance, then the road may no longer retain aspects of historic integrity typically most important for roads significant under <i>Criterion A</i>.</p> <p>A note on integrity of association: The alignment from the period of significance indicates the specific place associated with the road's significance. If realignment has severed the important connection a road historically provided, then the current realigned roadbed may no longer retain integrity of association. However, bypassed segments of road may still retain integrity of association if they retain alignment and other sufficiently intact essential roadbed features from the period of significance.</p>

Section 5: Step 2: Assessing Historic Integrity of Roads in Idaho's State Highway System

Examples of typical alterations (existing)	Assessment of historic integrity
	The construction of a new roadbed adjacent or parallel to the existing roadbed outside the period of significance is addressed below .
Widening portions of the existing roadbed outside the period of significance	<p>Widening of the existing roadbed might have resulted in changes to essential physical features, such as travel lanes, median strip, shoulder, embankment, and road surface. If the essential physical features and other road features were altered to the degree that they cannot convey significance, then the road may no longer retain aspects of historic integrity typically most important for roads significant under <i>Criterion A</i>, such as design, location, and association.</p> <p>Widening might not always result in a loss of integrity. For example, a small amount of widening (e.g., generally less than 20 percent of the original width) may not have had an impact on essential physical features such as travel lanes, embankment, or shoulder to the degree that the road can no longer convey its historic identity under <i>Criterion A</i>. As such, important aspects of historic integrity such as association, location, feeling, and design may be retained.</p> <p>In other cases, widening that impacts the essential physical feature of travel lanes by doubling the number of travel lanes might have occurred to a degree that the road can no longer convey its historic identity under <i>Criterion A</i> since important aspects of historic integrity could be diminished, such as design, feeling, and setting.</p>
Resurfacing of the existing roadbed outside the period of significance	<p>In-kind replacement of the road surface, such as replacing asphalt with asphalt, is a common change associated with this property type and will typically not result in a loss of integrity of most important aspects of integrity under <i>Criterion A</i>, such as design, location, and association.</p> <p>Resurfacing resulting in a new surface type (e.g., from gravel to asphalt) might have resulted in a change to the essential physical feature of road surface under <i>Criterion A</i>. This change may diminish integrity of design and materials. Materials is typically not an important aspect of integrity under <i>Criterion A</i>. Design is an important aspect, but since it is also conveyed through the essential physical features of embankment, alignment, and number of travel lanes, a change in road surface when taken alone does not generally result in a loss of integrity of design.</p> <p>An existing alteration to surface type will not cause an overall loss of integrity under <i>Criterion A</i> if other essential physical features are present to a degree that can demonstrate the importance of a road's historical association and connection through retention of aspects of integrity of design, association, location, and setting.</p>
Replacement of culverts and bridges outside of the period of significance	<p>Replacement of roadbed-related features alone is not typically expected to have diminished a road's ability to convey significance under <i>Criterion A</i>. The retention of other essential features of the road such as embankment, alignment, and the number of travel lanes will typically better demonstrate the importance of a road's historical association and connection under <i>Criterion A</i>.</p> <p>However, replacement of roadbed-related features, such as bridges and culverts, needs to be considered in addition to other changes to determine the overall impact of alterations on aspects of historic integrity most important under <i>Criterion A</i>, including design, materials, setting, and feeling.</p>

Examples of typical alterations (existing)	Assessment of historic integrity
Construction of a new roadbed adjacent or parallel to the existing roadbed outside the period of significance	New construction of a separate adjacent or parallel roadbed that results in no physical changes to the existing roadbed may not diminish a road's ability to convey significance under <i>Criterion A</i> . The retention of essential features of surface, embankment, alignment, and roadbed-related features (if applicable) can continue to demonstrate the importance of a road's historical association and connection under <i>Criterion A</i> and may not diminish the integrity of location, design, materials, workmanship, and association. When evaluating roads in which setting and feeling are important aspects of integrity (such as parkways, roads constructed with aesthetic features, or roads with scenic vistas, for example), new construction needs to be considered in addition to other changes and alterations to determine the overall impact on the aspects of historic integrity most important under <i>Criterion A</i> .

D. Assessing Historic Integrity – *Criterion C*

Criterion C relates to the significance of a road gained through its important road engineering, which is demonstrated by its design and construction. As previously described, travel lanes, the embankment, curvature and grade of the alignment, and road surface are typically essential physical features of the roadbed needed to convey the important engineering and its significance under *Criterion C*.

Design, materials, and location are typically the most important aspects of historic integrity in conveying a road's historical association. As a result, retention of these are typically required for a road to be eligible under *Criterion C*. The other aspects of integrity are also important under *Criterion C* and most should be retained to convey significance. Table 5 lists the relative importance of each aspect of integrity.

Table 5. Relevant aspects of historic integrity under *Criterion C*

Aspect of historic integrity	Importance under <i>Criterion C</i>
Design	Most important to convey significance – should be recognizable from the period of significance
Materials	Most important to convey significance – should be recognizable from the period of significance
Workmanship	If applicable, may be important to convey significance – should be recognizable and be retained together with other aspects to convey significance
Location	Most important to convey significance – should be recognizable from the period of significance
Setting	Least important to convey significance – if present will assist in conveying significance
Feeling	Least important to convey significance – if present will assist in conveying significance
Association	Least important to convey significance – If present will assist in conveying significance.

This guidance generally applies to roads with significance under *Criterion C*; however, the assessment of integrity needs to consider the nature of the engineering significance and essential physical features for each road and will vary for each road depending on the type of changes. Alterations need to be assessed on a case-by-case basis to determine the overall impact of this change on the road's historic integrity and if it obscures or detracts from the ability of the road to convey its historic identity. Table 6 provides guidance on the assessment of integrity for a road under *Criterion C*.

Section 5: Step 2: Assessing Historic Integrity of Roads in Idaho's State Highway System

**Table 6. Examples of existing alterations that may affect assessment of historic integrity under
*Criterion C***

Examples of typical alterations (existing)	Assessment of historic integrity
<p>Realignment of portions of a roadbed outside the period of significance</p>	<p>Realignment might have resulted in changes to essential physical features of the current roadbed, such as the number of travel lanes, embankment, the curvature and grade of the alignment, and road surface, which are likely important for a road with engineering significance. Changes of sufficient scale might have resulted in a loss of one or more important aspects of integrity, such as design, location, and materials.</p> <p>Realignment may also have resulted in bypassed segments that may retain essential physical features that were present during the period of significance. Such bypassed segments may retain aspects of integrity such as design, location, and materials.</p> <p>If the changes result in the loss of essential physical features, and other elements of the roadbed and other road-related features were altered to the degree that they cannot convey significance, then the road may no longer retain aspects of historic integrity typically most important for roads significant under <i>Criterion C</i>.</p> <p>The construction of a new roadbed adjacent or parallel to the existing roadbed outside the period of significance is addressed below.</p>
<p>Widening portions of a roadbed outside the period of significance</p>	<p>Widening (increase in width or number of travel lanes to the existing roadbed under evaluation) might have resulted in a change to essential physical features, such as travel lanes, median strip, shoulder, embankment, and the road surface, which are likely important for a road with engineering significance. If the changes result in the loss of essential physical features of the roadbed and roadbed-related features were altered to the degree that they cannot convey significance, then the road may no longer retain aspects of historic integrity typically most important for roads significant under <i>Criterion C</i>, such as design, location, and materials.</p>
<p>Resurfacing of road outside the period of significance</p>	<p>In-kind replacement of the road surface, such as replacing asphalt with asphalt, is a common change associated with this property type. In-kind replacement might have diminished integrity of materials and design under <i>Criterion C</i> but taken alone does not generally result in a loss of these aspects of integrity.</p> <p>Resurfacing resulting in a new surface type (e.g., from gravel to asphalt) might have resulted in a change to the essential physical feature of road surface under <i>Criterion C</i>. This change will diminish important aspects of integrity of design and materials and may result in a loss of integrity.</p>
<p>Replacement of culverts and bridges outside of the period of significance</p>	<p>Replacement of roadbed-related features alone will typically not cause an overall loss of integrity and a road's ability to convey significance under <i>Criterion C</i> if they are not identified as essential physical features. Roadbed-related features can be important to convey the historic identity of a road and can contribute to its significance. The impact of previous replacement of roadbed-related features, such as bridges and culverts, needs to be considered in addition to other changes to determine the overall impact of alterations on aspects of historic integrity most important under <i>Criterion C</i>, including design, location, and materials.</p>

Volume 2: Application of the National Register Criteria for Evaluation

Examples of typical alterations (existing)	Assessment of historic integrity
Construction of a new roadbed adjacent or parallel to the existing roadbed outside the period of significance	New construction of a separate adjacent or parallel roadbed that results in no physical changes to the existing roadbed may not diminish a road's ability to convey significance under <i>Criterion C</i> . The retention of essential features of surface, embankment, alignment, and roadbed-related features (if applicable) can continue to demonstrate the importance of a road's design and construction under <i>Criterion C</i> and may not diminish the integrity of location, design, materials, workmanship, and association. When evaluating roads in which setting and feeling are important aspects of integrity (such as parkways, roads constructed with aesthetic features, or roads with scenic vistas, for example), new construction needs to be considered in addition to other changes and alterations to determine the overall impact on the aspects of historic integrity most important under <i>Criterion C</i> .

Roads that retain integrity move onto to Step 3. Roads that do not retain integrity at the end of Step 2 do not meet the National Register Criteria for Evaluation and are not eligible for listing in the National Register unless additional or new information is learned that affects their ability to meet the *Evaluation Criteria* outlined in Steps 1 and 2.

SECTION 6. STEP 3: COMPLETING NATIONAL REGISTER ELIGIBILITY RECOMMENDATIONS

Roads or segments of roads within Idaho's State Highway System that possess significance and retain integrity are eligible for listing in the National Register. To complete a National Register determination of eligibility, the historic boundary for each eligible road segment should be defined to account for the physical location and extent of the property. *National Register Bulletin: Defining Boundaries for National Register Properties* provides guidance on the identification of a boundary that is appropriate for the resource and its area of significance. Justification of a historic boundary for a road commonly includes a beginning and ending point (termini) and extends horizontally and vertically to include the essential physical features from the period of significance. Historic boundaries may not coincide with current right-of-way boundaries. Eligibility determinations should be submitted to SHPO for concurrence.