



MEMORANDUM

TO: Idaho Transportation Department, Contractors & Consultants
FROM: Ken Reid, Deputy SHPO, State Historic Preservation Office
DATE: July 8, 2003
SUBJECT: Agricultural Irrigation Resources



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Governor of Idaho

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HISTORY.IDAHO.GOV

There has been considerable discussion in recent months regarding the evaluation of historic agricultural irrigation resources as they pertain to highway projects and Section 106. It has been the position of the State Historic Preservation Office that irrigation resources should be viewed as a whole; that you should document and consider the smaller pieces of the system just as you should document all of the architectural elements on a building. Small irrigation ditches would typically be evaluated as one element in a vast, eligible, linear resource, and therefore, eligible for the National Register of Historic Places.

At the recent SHPO/ITD training, this issue arose repeatedly, prompting us to raise the issue with the National Register staff at the National Park Service. Their feeling was that there are two potential approaches: considering all elements of the irrigation system, or looking only at the larger, more primary, elements. In further discussion, they indicated that, in fact, either approach is defensible, and could be appropriate in Section 106 review.

Given this, the SHPO has been discussing this issue internally and has determined that we will be making a change to our policy regarding the evaluation of historic agricultural irrigation resources. Beginning immediately, we will only require recordation and evaluation of canals, primary laterals that divert directly off of the canals (these typically have a name or number), and regulated drainage systems, for Section 106 compliance. You will no longer be required to record and evaluate resources below that level, such as secondary laterals or ditches. This decision was made for a number of reasons, but primarily for the purposes of simplifying and streamlining the 106 process. The previously required recordation and evaluation of minor irrigation elements put a strain on both ITD and SHPO staff resources.

Before the celebration begins, there are a few important exceptions to this new policy. First, in the case of historic farmsteads, the irrigation ditches or structures would likely be considered part of the agricultural landscape and if the farmstead is eligible, the irrigation elements may be considered contributing resources. Second, should you encounter an unusual resource or something that you feel might merit additional research, we would expect that contractors would investigate further.

And finally, keep in mind that there are other types of ditches (e.g., unnamed mining-related ditches that may be part of a mining district) that could be considered potentially eligible; this policy applies only to historic, agricultural, irrigation resources.

If you have any questions, you may call us at 208-334-3861.