

Post-WWII Residential and Commercial Properties

Virtual Peer Exchange

April 11-13, 2023



Post-WWII Residential and Commercial Properties Virtual Peer Exchange Report

INDOT, January 2024

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Introduction

The Section 106 process is a vital component of environmental review in the context of federal transportation projects. Compliance with Section 106 ensures that the effects of those projects on historic properties or sites are taken into account. Every year, more resources become potentially eligible for the National Register of Historic Places (NRHP) as they reach fifty years of age. Post-WWII residential properties, due to their ubiquity, comprise a rapidly growing proportion these resources.

In the years immediately following World War II (WWII), two problems arose in the form of a drastically increased population and a lack of sufficient homes to house that population. To address these issues, residential structures and neighborhoods were constructed rapidly and in large numbers “from the mid-1940s through the 1970s.”¹ As these numerous and “common” resources reach the 50-year NRHP threshold, Cultural Resources practitioners are faced with several challenges, such as: how these resources should be evaluated, how significance should be assigned, and how to assess the integrity of a ‘newer’ resource built with relatively modern materials.² Given these challenges, disputes regarding identification and eligibility of these resources are expected to become increasingly frequent.

Cultural Resources practitioners across the country, the National Park Service (NPS), the national Cooperative Highway Research Program (NCHRP), and the American Association of State Highway and Transportation Officials (AASHTO) have presented various methods to address these challenges. The NCHRP-funded *A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing* provided a “national historic context and a survey and evaluation methodology for single-family postwar residences.” The NPS’s quarterly *Best Practices Review* issued “Evaluating Common Resources,” which provided guidance that included post-war resources. A report prepared for AASHTO by Louis Berger U.S. Inc., “Review of Historic Property Identification Surveys & Strategies for Managing Post-World War II Housing in Transportation Projects,” compiled literature reviews, multiple state of practice (SOP) findings, and case studies regarding post-WWII resources from multiple states.³

All three of the above-listed products highlight the importance of a well-developed historic context in which to place the post-WWII residential properties, a streamlined survey methodology, and a “consistent” evaluation methodology.⁴ Indiana’s answer to these challenges was the Indiana Division of Historic Preservation and Archaeology (DHPA)-funded Multiple Property Documentation Form (MPDF) *Residential Planning and Development in Indiana, 1940-1973* (Higgins, 2017). The MPDF provided a

¹Emily Pettis and Christina Slattery, “A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing,” *TR News* 292, (2014): 47-49, [TRN 292 \(trb.org\)](https://trb.org/onlinepubs/trb.org/onlinepubs/nchrp/docs/NCHRP25-25(110)_FinalReport.pdf).

² Pettis and Slattery, “A Model for Identifying and Evaluating the Historic Significance,” 47-49.; Deiber, Camilla, “Review of Historic Property Identification Surveys & Strategies for Managing Post-World War II Housing in Transportation Projects.” AASHTO Committee on Environment and Sustainability, 2019. [https://onlinepubs.trb.org/onlinepubs/nchrp/docs/NCHRP25-25\(110\)_FinalReport.pdf](https://onlinepubs.trb.org/onlinepubs/nchrp/docs/NCHRP25-25(110)_FinalReport.pdf).

³ Pettis and Slattery, “A Model for Identifying and Evaluating Historic Significance,” 47-49; Deiber, Camilla, “A Review of Historic Property Identification Surveys & Strategies,” 1-88; National Park Service, “Evaluating Common Resources,” *National Register Bulletin guidance* 5, 4 (2023): 1-6.

⁴ Ibid.

relevant and useful state-specific context that allowed Cultural Resources practitioners in Indiana to identify and evaluate post-WWII residential resources within that narrowed framework.

During the process of identifying and evaluating post-WWII residential properties and neighborhoods, the Indiana Department of Transportation's (INDOT) Cultural Resources Office (INDOT-CRO) and the Indiana State Historic Preservation Officer (IN-SHPO) began to increasingly disagree on the eligibility of Post-WWII neighborhoods. INDOT-CRO utilized the *Residential Planning and Development in Indiana, 1940-1973* MPDF to identify and evaluate those post-WWII resources. Disagreements between INDOT-CRO and IN-SHPO regarding application of the MPDF ensued. Several of the resulting eligibility disagreements were taken to The Keeper of the National Register (The Keeper).

The disagreements taken to The Keeper were the result of one added travel lane project for which INDOT's consultant found that no properties in the Area of Potential Effects (APE) were eligible according to the methodology and requirements laid out in the *Residential Planning and Development in Indiana, 1940-1973* MPDF. IN-SHPO responded that they had identified five post-WWII residential subdivisions they believed were NRHP eligible under Criterion A, Criterion C, or both:

- Richards and Landers Mount Pleasant Subdivision (Criterion A)
- Wood Creek Estates (Criteria A & C)
- Carefree Subdivision (Criteria A & C)
- Ridge Hill Trails (Criteria A & C)
- Royal meadows/Hill Valley Estates (Criteria A & C)

An addendum Historic Property Report (an identification and evaluation step in INDOT's Section 106 process) was prepared and, again, found no properties in the APE eligible for the NRHP. INDOT reconsidered and recommended one of the five residential neighborhoods, Carefree Subdivision, eligible under Criteria A & C. The four remaining subdivisions were brought to The Keeper, who made the following determinations:

- Richards and Landers Mount Pleasant Subdivision: Not Eligible
- Wood Creek Estates: Not Eligible
- Ridge Hill Trails: Not Eligible as submitted, however Plat 1 of the neighborhood should be evaluated individually.
 - Plat 1 was found individually eligible under Criterion C
- Royal Meadows/Hill Valley Estates: Eligible with modified boundaries
 - The portion located in the APE of the project was found not eligible.

Following The Keeper's determinations, INDOT-CRO sought to understand the potential issues other state Departments of Transportation (DOTs) encountered when identifying and evaluating post-WWII resources, both residential and commercial. This resulted in the organization of a virtual Peer Exchange in which each participating state could present their methodologies while sharing their challenges and best practices for identification and evaluation of post-WWII residential and commercial properties along with best practices they have developed for building rapport with the SHPO. The Peer Exchange also provided a platform that allowed each state DOT to discuss problems encountered and solutions utilized when identifying and evaluating potentially eligible resources of that era, which the other state DOTs could learn from and apply in their home states.

The Peer Exchange was conducted virtually from April 11-13, 2023. The virtual nature of the Exchange was a result of its initial conception during the height of the COVID-19 pandemic. The participants included both state and federal level Section 106 practitioners from INDOT, the Ohio Department of Transportation (ODOT), the Georgia Department of Transportation (GDOT), the Colorado Department of Transportation (CDOT), the Maryland Department of Transportation (MDOT), the Federal Highway Administration (FHWA) Headquarters, FHWA-Indiana Division, and the FHWA Resource Center.

The Exchange

The Peer Exchange was organized around individual state presentations followed by group discussion regarding practices, methodologies, and issue resolutions. Ahead of the Peer Exchange, INDOT produced a framework for presentations and shared that framework with each of the other peer states so that presentations would follow general guidelines with respect to order and content:

- Organization
 - State FHWA Division Organizational Chart
 - SHPO Organizational Chart
 - State DOT Cultural Resources Organizational Chart
- General Section 106 Compliance
 - Survey Methodology
 - Minor Projects Programmatic Agreement
 - Full Section 106
- Post-WWII Resources
 - Processes in State
 - Application of Processes
- Challenges
 - Specific Issues in State
 - Lessons Learned

Each day of the Peer Exchange, one or more peer state DOT(s) presented a prepared presentation that described the state of practice in their state followed by a question-and-answer (Q&A) period. The Q&A was then followed by guided discussions on selected topics related to the identification and evaluation of post-WWII resources, DOT/SHPO relationships, and general practices. Several overarching themes emerged over the course of the presentations, Q&A sessions, and guided discussions. Rather than summarize the discussions in chronological order, they are presented here according to those themes.

Overcoming Issues with Identification, Documentation, and Evaluations

Context Development

The participating DOTs noted varying levels of interest on the part of their respective SHPOs regarding post-WWII resources:

- INDOT: IN-SHPO is very interested in post-WWII resources and had previously obtained a grant to produce an MPDF to provide context and guidance in the evaluation of those resources.
- GDOT: SHPO is interested in developing a context for post-war resources but has other contexts they are working to develop first.
 - As a result, GDOT has been spearheading the effort to develop a context for these resources.

- ODOT: interest in post-WWII resources is leading them toward development of a context and evaluation guidelines.
 - SHPO is more interested in commercial resources while ODOT is focusing on residential resources.

Historic contexts are essential tools for evaluating cultural resources, but the development of those contexts requires funding. GDOT noted that most of their funding for context development stems from mitigation for other projects, though they have also utilized various research funds.

The peer-state DOTs had several excellent examples of context development for particular property types. GDOT’s Ranch House Context, *The Ranch House in Georgia: Guidelines for Evaluation*, was developed after a series of eligibility disagreements led to the creation of a collaborative team focused on ranch houses, the Ranch House Assessment Team. The team included GDOT cultural resources staff, SHPO staff, consultants, and the Georgia Transmission Corporation. The context includes an overview of the origins and evolution of the ranch house and its subtypes, their character defining features, and period of significance. It also provides guidance for documenting ranch houses, applying the National Register criteria, and evaluating their integrity for the purposes of Section 106 compliance and National Register nominations.

CDOT developed the Denver-specific historic context, *Historic Residential Subdivisions of Metropolitan Denver, 1940-65*, as well as the US 40 corridor-specific context, *West Colfax (US 40), 1876-1975*, and several other project-specific contexts. They also utilize a specific survey form for post-WWII subdivisions. *Historic Residential Subdivisions of Metropolitan Denver, 1940-64* was developed by CDOT in collaboration with their SHPO in 2010. The context covers architects, landscape architects, builders, and developers associated with local development; discusses patterns in residential subdivision development; and identifies character-defining features of subtypes. The context also has appendices that provide specific information about subdivisions and their associated numbers of dwellings, square footage, etc.

In 1999, the MDOT State Highway Administration (SHA), with cooperation from their SHPO, developed a context emphasizing the Washington D.C. area and covering the period from 1815 to 1960. An addendum covering the Suburban Diversification Period (1961-1980) was published in 2019. Utilizing the research undertaken in the original context, MDOT SHA created “suburban development systems” such as unplanned neighborhoods, planned neighborhoods, planned developments, and parks, as well as trends that encouraged the creation of those neighborhoods, developments, and parks. To ensure buy-in, they regularly updated their SHPO to keep them informed and allowed them to comment as the context moved forward. They also coordinated with consulting parties by developing an interactive online map where they could view planned evaluations and final determinations of eligibility.

[Evaluation Methods](#)

When a new class of resources ages into the 50-year NRHP threshold, there can be a learning curve for practitioners attempting to evaluate those resources. When Indiana’s MPDF was released, INDOT and IN-SHPO led a joint session to teach consultants how to apply it to the evaluation of post-WWII residential resources. One major challenge was determining whether certain replacements or additions detracted from integrity as much as they typically would for an older resource. To combat this,

INDOT directed their consultants to focus more on National Register of Historic Places significance and comparative analysis.

CDOT stated that they had taken the lead in developing several contexts for post-WWII resources and noted that the resulting MPDFs can be used for comparative analysis across regions or localities. INDOT replied that the IN-SHPO doesn't feel that different localities can be compared due to individual development. CDOT also noted that when evaluating post-WWII resources, they use a survey form that had been developed by their SHPO.

Defining a project's Area of Potential Effects (APE) and ensuring that it aligns with SHPO's expectations dictates the amount of effort involved in evaluating the effects of the project on resources within the APE. INDOT noted that if the APE of one of their projects overlaps a house in a neighborhood, the entire neighborhood will be evaluated. ODOT replied that their SHPO prefers that approach as well. GDOT stated that they, too, will normally evaluate the entire potential district if the APE overlaps a portion of it. They also discussed a specific project with a large footprint in which they utilized a programmatic agreement regarding sliver takes on properties immediately adjacent to the project area. This allowed for a more streamlined approach in their evaluation process.

Improving Rapport and Relationships with SHPO

SHPO Communication

Communication practices between the SHPO and DOT vary from state to state:

- GDOT: SHPO reviewers spend one day a week in the DOT office, which fosters improved communication between DOT and SHPO staff, as they can easily ask each other questions or discuss individual projects.
- INDOT: Regular communications are maintained with SHPO via monthly meetings to discuss high priority projects; other project-specific meetings between individual SHPO reviewers and INDOT cultural resources staff are also arranged on an ad hoc basis.
- ODOT: Holds regular meetings with both upper and lower-level staff at their SHPO to facilitate communication and camaraderie between the two agencies.
- CDOT: Holds quarterly meetings with SHPO to talk about projects and policies.

Reducing and Resolving Disagreements

For building rapport and reducing disagreements with the SHPO, ODOT noted the importance of taking the SHPO reviewer out into the field alongside the DOT, which allows for a collaborative look at the project and an opportunity to bond.

Eligibility disagreements between the SHPO and the state DOT can add weeks or months to the timeline of a project. CDOT stated that they will often send as much information as they can to ensure that any possible piece of information the SHPO needs to make their determination is available from the beginning. In cases where the SHPOs do not provide detailed explanations when they disagree with eligibility recommendations, one peer state offered the advice of requesting a formal letter that provides a complete explanation.

Regarding effects, INDOT and ODOT noted that they were unlikely to have disagreements with their SHPOs when it came to the effects of a project on an eligible property or site. Georgia and Colorado stated that, in their experience, they were unlikely to receive an Adverse Effect finding based on noise. Georgia indicated that there would need to be an increase of 15 decibels or more to be considered an adverse effect on a historic property.

GDOT tracks all disagreements between their agency and SHPO for an end-of-year review. This allows them to talk through those disagreements without the pressure of project timelines weighing on the discussion.

David Clarke of FHWA reminded the state DOTs that it is, in fact, okay to disagree with SHPO on some determinations or assessments of effects. However, he noted not to let those disagreements ruin a good working relationship between the DOT and the SHPO so that future projects don't suffer as a result. He emphasized that project delivery is the paramount goal for state DOTs.

Persistent and New Challenges

Persistent Challenges

Persistent issues delaying transportation projects are common in occurrence and varied in type. In Indiana, frequent and sometimes unclear requests from SHPO for additional information are a common cause of delays. ODOT noted their SHPO sometimes changes their opinion about the eligibility of a resource based on Consulting Party input, which has the potential to prolong the Section 106 process and delay projects.

Differences of opinion regarding what constitutes a good faith effort to identify and evaluate resources are another kind of persistent challenge faced by state DOTs. David Clarke noted that there must be a line between demonstrating a good faith effort and producing a dissertation-level report. He also warned that disagreements over eligibility determinations can sometimes result in back-and-forth letter writing campaigns, and this should be avoided in order to keep project timelines intact.

New Challenges

All state DOTs need to be prepared for large numbers of resources that are about to age into the 50-year threshold for NRHP eligibility, and the associated challenges those resources will bring. These challenges range from recently built replicas of older house styles to determining stylistic differences – or a lack thereof – between 1970s and 1980s ranch houses.

One shared concern that was identified involved resources such as roadside motels and mobile home parks, and how to determine defining features and eligibility when there is a lack of established contexts and few comparative examples to look to. Colorado and Ohio mentioned that they find Federal Housing Administration (FHA) Guidelines regarding mobile home parks to be helpful in providing context for making eligibility determinations.

An additional concern expressed by the peer states is that the SHPOs seem to be lowering the bars for significance and integrity for these resources, while their expectation for the level of effort for documentation and evaluation on the part of the DOTs and consultants is rising.

Working with Consultants

Evaluating Consultant Work Products

Consultants and their work are an integral part of completing the Section 106 process. The work and associated documentation consultants produce make it possible for DOT staff to do their jobs. Sometimes, though, the quality of consultant work products can be inconsistent or below an acceptable standard. The Peer Exchange first broached this topic with the question of how individual state DOTs address consultant work product quality and consistency.

Indiana requires that consultants be prequalified to do business with INDOT. One of the requirements for prequalification is demonstrating completion of a federally sponsored or endorsed Section 106 training. INDOT also uses a consultant evaluation system in which initial submissions are scored according to an established set of criteria, followed by a second score for overall experience. These scores are considered when contracts are awarded.

Georgia utilizes a consultant evaluation system where each work product is scored based on quality and timeliness, as well as individual criteria specific to the type of product. These scores determine which consultants will get future contracts. Georgia also uses review durations on reports and if a product goes into its third draft, the consultant is required to come in to attend a workshop with GDOT to finish the product.

Ohio also utilizes an evaluation system and requires that all consultants be prequalified by ODOT to work on projects. Their prequalification system includes Section 106 classes to ensure that consultants fully understand the process.

Communicating with Consultants

The next discussion question regarding consultant work product quality and consistency was, when there are changes to guidance or procedures, how do the DOTs update their consultants on those changes?

- INDOT utilizes a listserv system, GovDelivery, and holds virtual chats in which they address various topics, answer questions, and receive feedback from the consultant community.
- GDOT holds a virtual biannual meeting, Georgia Partnership for Transportation Quality, with their consultant community in which they address new processes, templates, and procedures.
 - This allows them to address any issues or questions at the outset, as well as discuss any challenges their consultants are attempting to overcome.
- ODOT has a system of hybrid biannual or triannual meetings to discuss challenges, updates, and questions with their consultant community, as well as a listserv for disseminating updates between meetings.

Consulting Party Involvement and Outreach

Consulting Party Interest

As more post-WWII resources have turned 50 years old and are being evaluated for National Register eligibility, some states have consulting parties that take a specific interest in them.

- In Indiana, the historic preservation group Indiana Landmarks has a specific committee focused on post-WWII resources.
- In Georgia there is primarily one group interested in postwar resources, as most consulting party interests are in older resources.
- In Colorado, most of the consulting party engagement occurs in larger metropolitan areas, like Denver, where the architecture is older.

Stephanie Stoermer of FHWA noted that consulting party engagement and discussions on various resources seems to vary regionally. For example, in California, post-WWII resources were high on the list of discussion, while in Texas it barely came up.

Consulting Party Engagement

Engaging consulting parties is an important and necessary part of the Section 106 process. Reaching out to and engaging with potential consulting parties is vital for receiving public feedback and helps in maintaining transparency and creating a level of trust between the DOT and the public.

- INDOT utilizes IN SCOPE, a digital repository, in which all Section 106 documents are made publicly available, allowing consulting parties to read and make comments based on those documents.
- GDOT has had success with hybrid or entirely virtual meetings, which allow consulting parties to attend without leaving their homes.
 - Both INDOT and GDOT confessed difficulties in engaging consulting parties on certain projects but stated that when consulting parties do engage it cultivates a more fruitful conversation and more meaningful mitigation opportunities.
- CDOT utilizes virtual meeting options as well and has had relatively good consulting party engagement in Denver, where there are numerous active community and neighborhood groups.
- Ohio mentioned that their SHPO is a huge help in engagement with consulting parties because the SHPO prefers public input before making determinations.
- MDOT noted that their use of a GIS map eliminated a lot of potential questions from consulting parties, as the parties were able to look at project locations and details themselves.

Miscellaneous Topics

While many of the topics discussed fit into the specific themes listed above, some valuable insights were singular in nature. CDOT mentioned strengthening relationships within their own organization by holding a training with their engineers in which they made them act as the historian. This

allowed the engineers to understand the ways in which we in Cultural Resources perform our duties and the reasoning behind our decisions and requests. By doing this, the engineers could then perform their work with cultural resources in mind.

GDOT's Avoidance and Minimization Measures Meeting (A3M) takes place after resource identification and SHPO concurrence and provides an opportunity for all specialists involved in a project to meet. Designers, engineers, cultural resource staff, and others meet to discuss the project footprint and design and methods to avoid and minimize potential adverse impacts.

Lessons Learned

Communication is a key factor. Whether the communication is between state DOTs and their respective SHPOs or between Cultural Resources units and other departments in their organizations, communicating early, often, and effectively creates better outcomes. That communication also builds closer bonds agency to agency and department to department.

Context development and utilization are vital to our work. Development of historic contexts in relation to specific resources not only saves time in terms of project scheduling but allows historians to have a deeper understanding of what they are evaluating. As Section 106 practitioners, we must be cognizant of the next generation of potential historic properties. To perform our work to the best of our abilities, we must be able to anticipate what property types we will be evaluating and develop best practices for determining their eligibility.

As individuals, we can sometimes lose sight of our objectivity and take things personally. It is important to take a step back and recover objectivity when facing a challenge or seeking a solution. Whether it is a disagreement over identification or evaluation or a dispute regarding effects, remember to keep it objective.

It is okay to disagree with SHPO. There are bound to be instances when it is simply impossible to agree on a particular resource or effect. The important part is to find a way to move past that disagreement and ensure preservation of the relationship.

Be a model of professional behavior. As stated above, disagreements happen, and personal feelings can often cloud our objectivity. An important aspect of moving forward when those challenges occur is maintaining a professional demeanor, even if (or especially if) others are not doing so.

When facing the various challenges of Cultural Resources work, keep in mind that you are not alone. The issues facing us are often the same or very similar for those of us working in DOTs across the nation. Reaching out to colleagues across state lines can often provide potential strategies to overcome those challenges.

Best Practices

Two issues formed the impetus for this Peer Exchange: the evaluation of post-WWII resources and the improvement of the relationship between the state DOT and SHPO. In discussion with our fellow DOTs, several pieces of excellent advice were shared.

Post-WWII Resources

- Approach resources from a broader level in terms of context rather than a resource-by-resource approach.
- Actively engage in the development process for evaluation tools.
- Utilize FHA guidelines, when applicable.
- Provide public facing GIS maps of project locations and details, as these can eliminate potential questions from consulting parties.
- If possible, partner with SHPO and the consultant community in the development of potential contexts or evaluations.
- Utilize the NCHRP study, *A Model for Identifying and Evaluating the Significance of Post-World War II Housing* when possible.

Relationship with SHPO

- Embedded reviewers within the DOT to allow for consistent and open communication.
- Quarterly (or more frequent) meetings with SHPO that are not project specific allow for communication outside of the confines of project details.
- Shared training with both the state DOT and the state SHPO on specific topics can help to create a shared vocabulary and understanding of particular resources or processes.
- Providing food and/or beverages at meetings can help create an air of comradery among SHPO and DOT staff.

Tools and Strategies for Streamlining the Process

- Programmatic Agreements (Minor Projects, Bridges, etc.)
- Memoranda of Understanding (MOUs) for specific project types
- No Historic Properties Affected (NHPA) determinations that do not require SHPO concurrence
- Expedited SHPO review times in cases of NHPA and NAE (No Adverse Effect) determinations
- Prequalification of consultants to ensure product quality

Next Steps

The following are the proposed next steps for the host DOT (INDOT) following the Peer Exchange:

- Development of a programmatic agreement or other treatment for mid-twentieth century resources with SHPO buy-in on potential impacts and project types that would have minimal impact on these resources.
- Creating and cultivating an improved relationship with SHPO by having more frequent and consistent in-person meetings that are not project specific to help build rapport between the two agencies.
- Sponsor a historic context and windshield survey of other mid-twentieth century property types beyond single-family residential resources.

Appendix A: Peer Exchange Agenda and Guided Discussion Questions

Agenda

Post-WWII Residential/Commercial Properties & Eligibility

Virtual Peer Exchange

Agenda

April 11-13, 2023

Tuesday April 11

12:00pm-12:15pm*	Kick-Off/Introductions (FHWA)
12:15pm-12:45pm	Peer State Presentation (Indiana DOT)
12:45pm-1:15pm	Peer State Presentation (Ohio DOT)
1:15pm-1:25pm	Break
1:25pm-1:45pm	Guided Discussion #1: Identification/Documentation/Evaluation Issues and Overcoming Them
1:45pm-2:15pm	Guided Discussion #2: SHPO: Rapport and Improving Relationships
2:15pm-2:45pm	Guided Discussion #3: Continuation of SHPO Conversation
2:45pm-3:00pm	Conclusions/Wrap-up

Wednesday April 12

12:00pm-12:15pm	Recap/Summary of Previous Day (FHWA)
12:15pm-12:45pm	Peer State Presentation (Georgia DOT)
12:45pm-1:15pm	Peer State Presentation (Colorado DOT)
1:15pm-1:25pm	Break
1:25pm-1:45pm	Guided Discussion #1: Persistent vs New Challenges
1:45pm-2:15pm	Guided Discussion #2: Staffing and Working with Consultants
2:15pm-2:45pm	Guided Discussion #3: Consulting Parties: Involvement and Outreach
2:45pm-3:00pm	Conclusions/Wrap-up

Thursday April 13

12:00pm-12:15pm	Recap/Summary of Previous Day (FHWA)
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12:15pm-12:45pm	Peer State Presentation (Maryland DOT)
12:45pm-1:15pm	Guided Discussion #1: Lessons Learned
1:15pm-1:25pm	Break
1:25pm-1:45pm	Guided Discussion #2: Best Practices
1:45pm-2:15pm	Guided Discussion #3: Next Steps
2:15pm-2:45pm	Post-WWII Smorgasbord
2:45pm-3:00pm	Wrap-up & Adjourn

*All listed times are Eastern Standard Time (EST)

Guided Discussion Questions

Post-WWII Residential/Commercial Properties & Eligibility

Virtual Peer Exchange

Guided Discussion Questions

April 11-13, 2023

Day 1:

Guided Discussion #1: Identification/Documentation/Evaluation Issues and Overcoming Them

- Is your SHPO particularly interested in post-WWII resources?
- Has your SHPO provided leadership in 'getting the word out' to practitioners about postwar resources? If so, how and to what degree?
- Have you experienced a learning curve for consultants identifying and evaluating post-WWII resources?

Guided Discussion #2: SHPO: Rapport and Improving Relationships

- How would you describe your communication with your SHPO?
 - How do you communicate? Phone calls, regular meetings, emails, letters, other means? How often?
- Can you share examples of overcoming specific challenges with SHPO?
- How have you fostered a relationship with your SHPO?

Guided Discussion #3: Continuation of SHPO Conversation Guided

- If your SHPO disagrees with the eligibility recommendations, what information are they providing or are they asking for additional information? Is there any further discussion that occurs?
- If you come to an impasse with your SHPO on eligibility, do you have any streamlined procedures/guidelines for how to move forward?
- Does your state have a staffing MOU with the SHPO? If so, can you describe how the MOU works? Benefits/challenges of MOU.

Day 2

Guided Discussion #1: Persistent vs New Challenges

- Direct/Indirect Effects? (Stephanie-Can you expand on this one?)
- What are your predictions for next wave of resource types/challenges?

- Are there any sticking points that you see persistently slowing project timing?

Guided Discussion #2: Staffing and Working with Consultants

- How do you address consultant work product quality and consistency?
- How do you reach out to consultant community with new guidance, procedures, updates?
- What is your review process of consultant prepared documentation?

Guided Discussion #3: Consulting Parties: Involvement and Outreach

- Any groups/orgs advocating for post-WWII resources in your states?
- Are you more or less likely to see high CP engagement with post-WWII resources? Why do you think that is?

Day 3

Guided Discussion #1: Lessons Learned

- What, if any, of what we've discussed has changed your view on your practices? How so?
- What, if any, of what we've discussed these past days will you work to implement in your state?

Guided Discussion #2: Best Practices

- What is one piece of advice you would offer to the other DOTs regarding evaluation of post WWII resources?
- What is one piece of advice you would offer to the other DOTs regarding fostering a good relationship with their SHPO?

Guided Discussion #3: Next Steps

- Is there anything we've discussed that you want more information on?
- Is there anything we should have discussed that you'd like to speak with a particular DOT about after we end today?

Appendix B: Virtual Peer Exchange Model and Best Practices

Virtual Peer Exchange Model

Communications Timeline

- 9-12 months from expected Exchange date
 - Determine topics for Peer Exchange
 - Reach out to potential Peer Exchange participants
- 6-9 months from expected exchange date
 - Confirm participants
 - Confirm presenters within your own organization
- 3-6 months from expected exchange date
 - Plan time with presenters within your organization weekly or biweekly to discuss presentation length, content, etc
 - Send date/time calendar invites to participants for expected Exchange date(s)
- 1-2 months from expected Exchange date
 - Reach out about availability for logistics meeting with participants (See XX for best practices and resources)
 - Hold logistics meeting with participants for fine details of the Exchange
 - Sent out finalized host presentation to participants to guide format of participant presentations
- 2 weeks from expected Exchange date
 - Hold final logistics meeting with participants to address any final questions/issues that have arisen
 - Request copies of participant presentations in both PowerPoint and PDF formats in case of technical difficulties
- 1 week from expected Exchange date
 - Send all participants finalized Exchange agenda
 - Ensure that all information necessary has been sent to participants and identify a key contact person if one has not already been identified
 - Ensure that all participants have submitted copies of their presentations
 - If not, request from those who have not submitted

Best Practices

Throughout this process, we discovered several practices that allowed for ease of communication and logistical planning. They are as follows:

- Utilize a scheduling poll to set meetings, such as Doodle Poll. This allowed each individual attendee to review several potential times for each meeting, including the Exchange itself, and select which times/dates worked best for them. It allowed us, as the hosts, the ability to survey all attendee availability at once and select the best time/date.
- Remind attendees at the beginning of each session the location of the “Raise Hand” function on Teams and utilize that during guided discussion portions. This prevents people from accidentally talking over each other and ensures that all attendees can say their answer or ask an additional question.
- Write guided discussion questions ahead of time to provide a roadmap but allow for flexibility if one is already answered during a separate discussion or a new question would better serve the group in terms of information sharing.

Appendix C: State Presentations

INDOT Peer Exchange Presentation

Presenters:

Kelyn Alexander

Haley Brinker

Clinton Kelly

Peer Exchange Post-WWII Residential and Commercial Properties

FHWA/INDOT Cultural Resources Office (CRO)

State of Practice

- **Organization**

- FHWA-IN Division Organizational chart
- SHPO Organizational chart
- INDOT CRO organizational chart
- INDOT/IDNR (SHPO) Memorandum of Agreement (MOU)

- **General Section 106 Compliance**

- Survey Methodology
- Minor Projects Programmatic Agreement
- Full 106

- **Post WWII Resources**

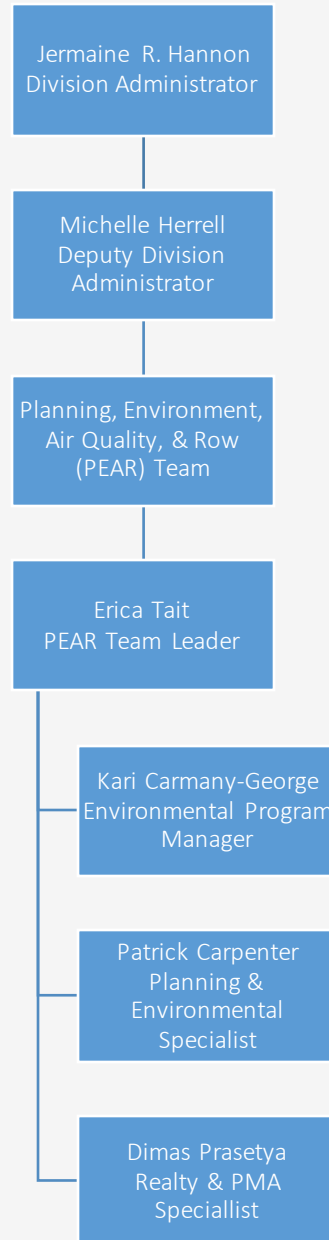
- Processes in State
- Application of Processes

- **Challenges**

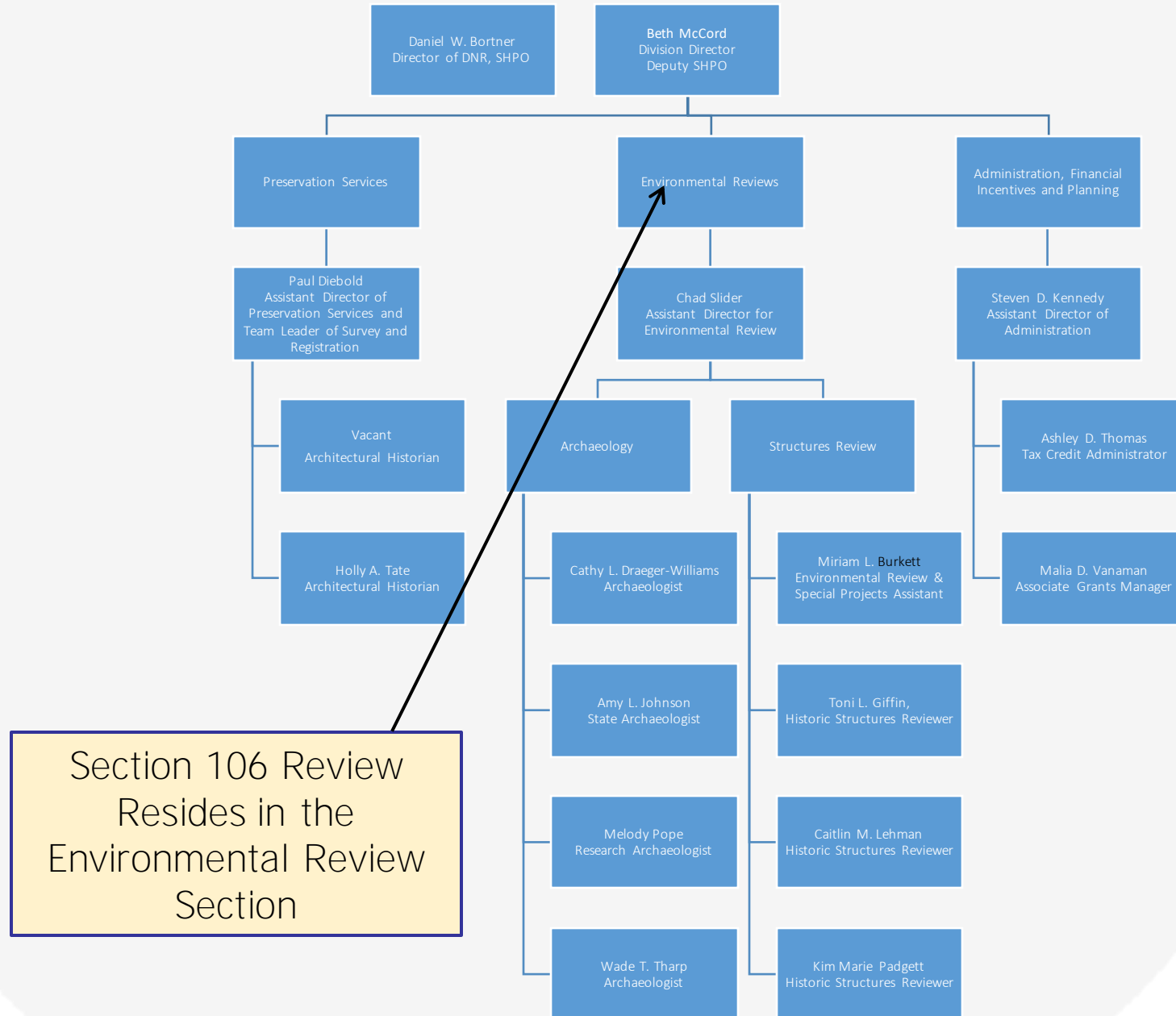
- Specific Issues in State
- Lessons Learned



FHWA-IN Division-Lead Federal Agency



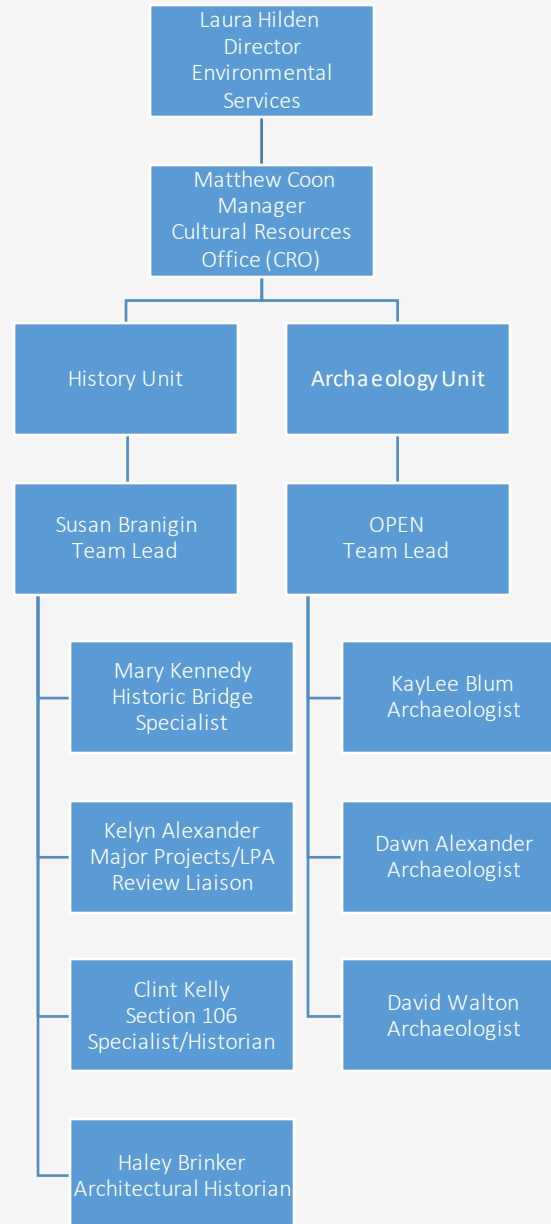
SHPO Organizational Chart



Section 106 Review
Resides in the
Environmental Review
Section



INDOT-CRO Organizational Chart



Memorandum of Understanding (MOU)

- MOU between INDOT and the Indiana Department of Natural Resources (IDNR)
- Mutually beneficial agreement whereby dedicated IDNR Qualified Professional (QP) staff, whose time is reimbursed by INDOT, provide priority reviews of INDOT & Local Public Agency (LPA) projects

IDNR staff members fulfilling this role must:

Provide guidance and advise INDOT cultural resources personnel on substantive historic preservation and archaeological issues, federal and state historic preservation laws and archeology review processes.	Represent IDNR's Division of Historic Preservation and Archaeology (DHPA) and the SHPO at meetings, as appropriate.	Participate in project consultation, tribal consultation, project site visits, project discussions, and consulting party meetings.	Provide guidance and advise INDOT and LPAs and/or their consultants regarding historic properties inventory, delineation of area of potential effect, eligibility determination and effect determination activities, as appropriate.	Participate in meetings, discussions and share information with INDOT on eligibility of resources that recently have/or are becoming eligible for the National Register as they meet the 50-year threshold for, including postwar residential resources. Also, collaborate with INDOT on disseminating this information to a wide audience.
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Survey Methodology

- Since 1978, Indiana has been performing architectural surveys in its 92 counties
- Surveys resulted in ‘interim reports’
- Hard-copy interim reports no longer produced; survey data maintained online in SHAARD by SHPO

* Information accessed via IUPUI Digital Collections and Indiana Landmarks: <https://ulib.iupui.edu/digitalcollections/IHSSI>

Interim Report rating system

- “...The survey ranks a structure as "notable" or "outstanding" if it is an excellent, relatively unaltered example of a particular architectural style, and/or has a strong association with local history, settlement patterns, or important figures. **Buildings that are rated “notable” or “outstanding” may be eligible for listing in the National Register of Historic Places.”**

Survey Methodology

Indiana Historic Sites and Structures Inventory

- Eligible
 - “Outstanding”-Possess integrity and significance to be eligible to the National Register
 - “Notable”-Possess the necessary significance to be eligible after further research
- Not Eligible
 - “Contributing”-do not possess the level of historical or architectural significance necessary to be individually eligible, but would contribute to a district
 - “Non-contributing”- only used within districts, not 50 years old, altered, cannot impart its significance

Indiana Historic Sites and Structures Inventory (IHSSI)

County Survey Sites

RATING

- Outstanding
- Notable
- Contributing
- Non-Contributing
- Demolished
- Unknown



SHAARD Database

<https://gisdata.in.gov/portal/apps/webappviewer/index.html?id=5f2c93ba15a6423b906fec4a2e986b85>

General Section 106 Compliance

There are two ways to complete Section 106 for FHWA projects in Indiana:

- **The easy way:**
 - Minor Projects Programmatic Agreement (MPPA)
- **The hard way:**
 - Full Section 106 process



Rolling Acres, Hamilton County.
Source: Indiana DNR – Division of Historic Preservation & Archaeology (IDNR-DHPA)

General Section 106 Compliance

Minor Projects Programmatic Agreement (MPPA)

- Part of the “*Programmatic Agreement (PA)...Regarding the Implementation of the Federal Aid Highway Program in Indiana*,” originally signed in 2006 by Federal Highway Administration, Advisory Council on Historic Preservation, Indiana State Historic Preservation Officer, and Indiana Department of Transportation. The PA was amended in 2019.
- Exempts common project types with little to no potential to adversely affect historic properties.
- Does not require consultation with or review by SHPO provided the project is: **1)** Limited to activities specified; **2)** Not part of a larger project; **3)** On an existing transportation facility; **4)** Has no known public controversy based on historic preservation issues.
- MPPA has two categories: **Category A** projects require no review by INDOT Cultural Resources Office (CRO). **Category B** projects, which require documentation and review by INDOT CRO. **For Category B projects, INDOT CRO can make eligibility determinations without formally consulting with the IN SHPO.**

MPPA Projects: 'Section 106 Lite'

Use of the MPPA is Section 106 the 'easy' way:

- As stated previously, projects that meet the conditions of Appendix A of the MPPA don't need any review by INDOT-CRO or qualified professional consultants (QP historians or archaeologists). **So Category A is the 'easy-easy' way to MPPA**
- Projects that meet the conditions of Appendix B of the MPPA need to be reviewed by INDOT-CRO but not by SHPO or other consulting parties. **Category B, then, is the 'slightly harder-easy way' to MPPA**

Category A

4. Roadway work associated with surface replacement, reconstruction, rehabilitation, or resurfacing projects, including overlays, shoulder treatments, pavement repair, seal coating, pavement grinding, and pavement marking within previously disturbed soils where replacement, repair, or installation of curbs, curb ramps or sidewalks will not be required.
5. Repair, in-kind replacement or upgrade of existing lighting, signals, signage, and other traffic control devices in previously disturbed soils.

Category B

2. Installation of new lighting, signals, signage and other traffic control devices under the following conditions [**BOTH Condition A, which pertains to Archaeological Resources, and Condition B, which pertains to Above-Ground Resources, must be satisfied**]:

Condition A (Archaeological Resources)

One of the two conditions listed below must be met (*EITHER Condition i or Condition ii must be satisfied*):

- i. Work occurs in previously disturbed soils; *OR*
- ii. Work occurs in undisturbed soils and an archaeological investigation conducted by the applicant and reviewed by INDOT Cultural Resources Office determines that no National Register-listed or potentially National Register-eligible archaeological resources are present within the project area. If the archaeological investigation locates National Register-listed or potentially National Register-eligible archaeological resources, then full Section 106 review will be required. Copies of any archaeological reports prepared for the project will be provided to the DHPA and any archaeological site form information will be entered directly into the SHAARD by the applicant. The archaeological reports will also be available for viewing (by Tribes only) on INSCOPE.

Condition B (Above-Ground Resources)

Work does not occur adjacent to or within a National Register-listed or National Register-eligible district or individual above-ground resource.

Full Section 106

- Based on the INDOT Cultural Resources Manual (CRM) guidance, consultants make eligibility recommendations via Historic Property Reports
- INDOT CRO reviews/approves recommendations, which are then sent to SHPO for concurrence
- SHPO formally responds with either concurrence or dispute on eligibility recommendations



Full Section 106

FHWA Role

- INDOT reviews and makes findings of “No Historic Properties Affected” and “No Adverse Effect”
- FHWA makes findings of “Adverse Effect” after INDOT reviews the determination



MPDF for Postwar Housing

- **New Guidelines for Evaluating Potential Postwar Historic Districts**

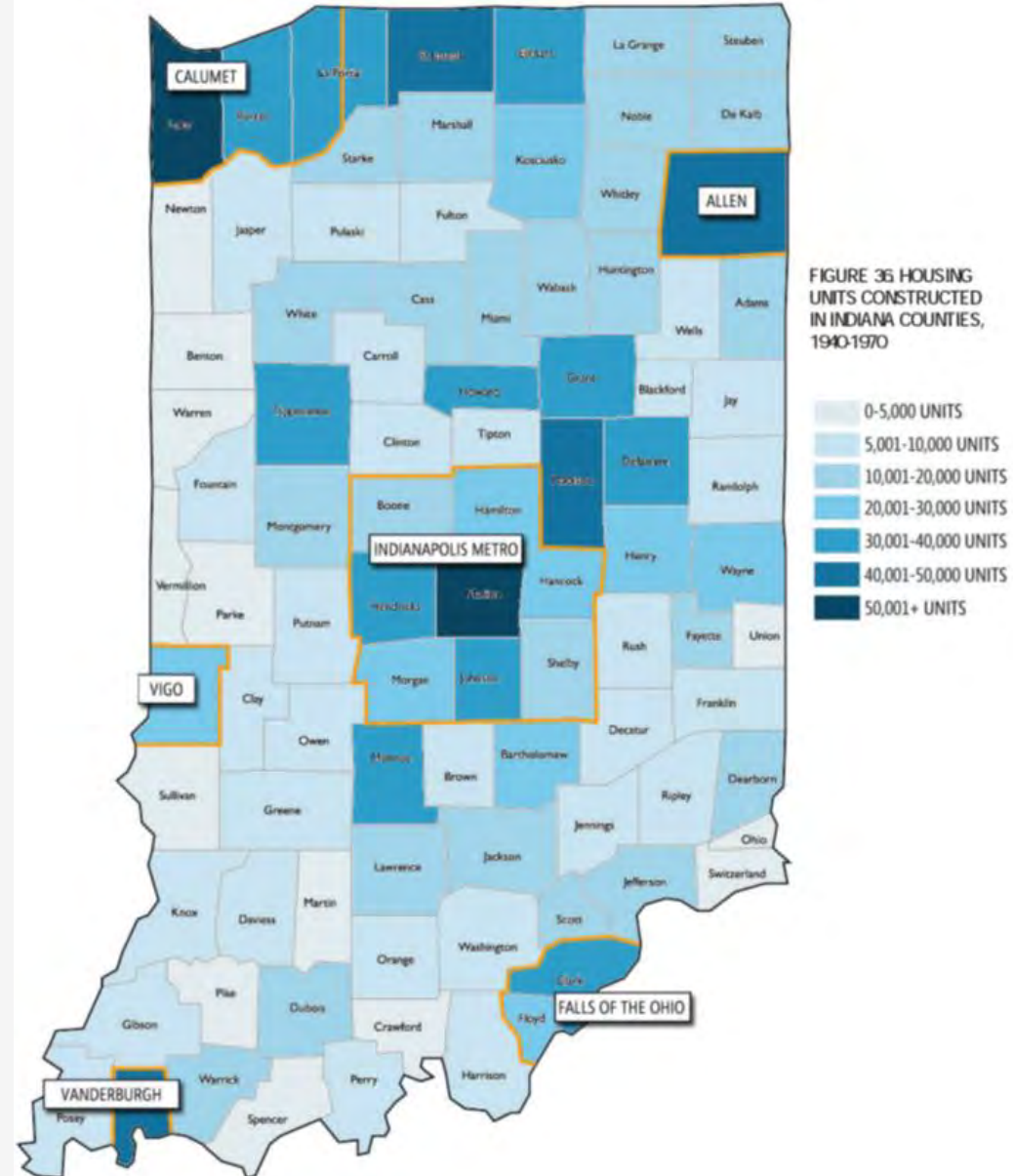
- In 2018, IDNR-DHPA released a new set of guidelines to evaluate postwar housing
- Guidelines can be found in a Multiple Property Documentation Form (MPDF) called *“Residential Planning and Development in Indiana, 1940-1973”*
- Linked on our website (www.in.gov/indot/2521.htm)



Independence Hill, Merrillville
Source: Orbis Environmental Consulting

MPDF for Postwar Housing

- One of the first of its kind in the nation.
- Covers residential construction only.
- Approved by the Keeper of the Register at the National Park Service.
- INDOT and FHWA did *not* have a role in creating or approving MPDF.



Recap of INDOT-CRO Outreach Efforts

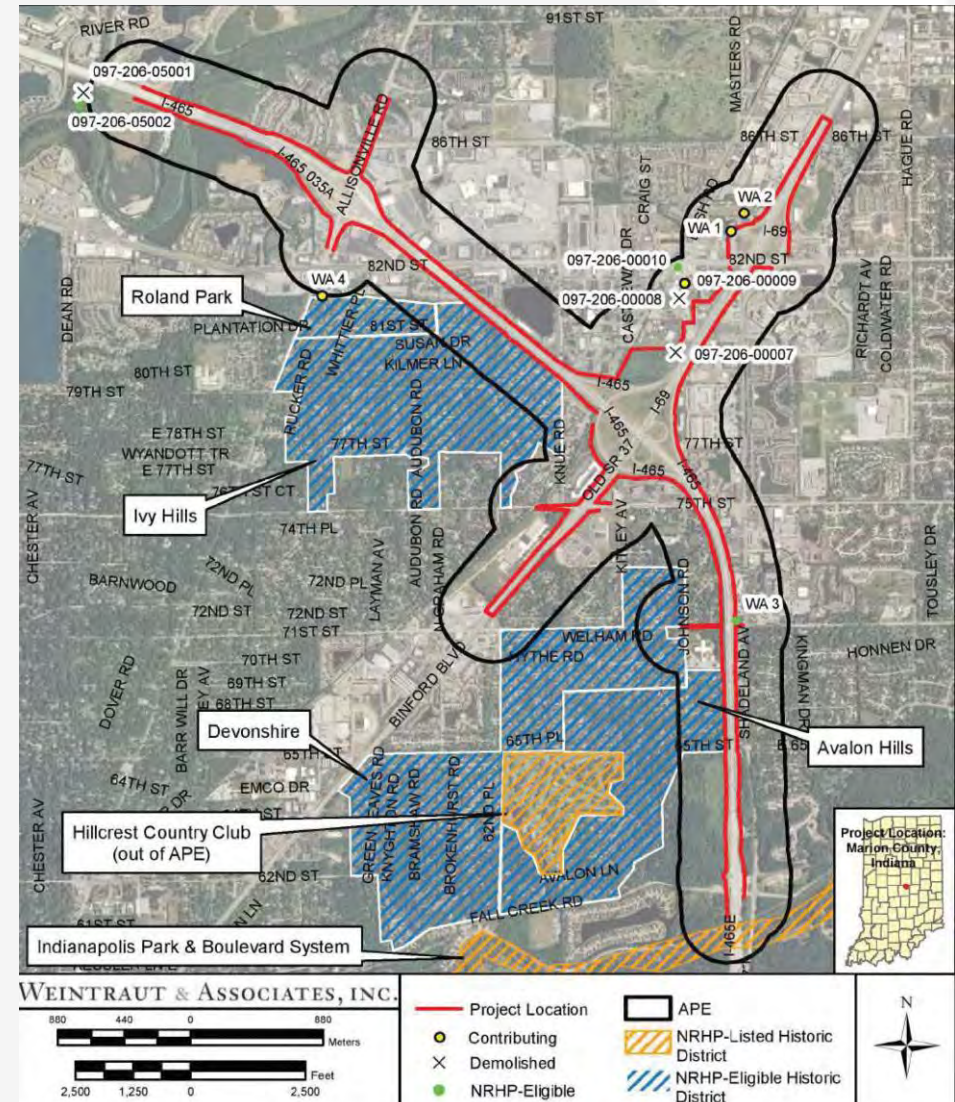
- INDOT-CRO had been in communication with SHPO about the MPDF since mid-2017.
- INDOT-CRO spoke at the January 2018 Indiana Historic Preservation Review Board, expressing concerns about the ramifications of the MPDF.



Ivy Hills, Indianapolis
Source: IDNR-DHPA

Recap of INDOT-CRO Outreach Efforts

- INDOT-CRO spoke at 2018 CEPDS, 2019 & 2020 Purdue University Road School conferences and co-hosted a workshop with IDNR-DHPA in 2018
- The guidance at those presentations focused on:
 - Comparative analysis
 - Making a “reasonable and good faith effort”



Clear Path 465. Source: Weintraut & Associates

Indiana MPDF –Subtypes

Residential Developments

- Five subtypes
 - World War II Era Housing Development, c. 1940-1949
 - Transitional Developments, c. 1945-1955
 - Tract Developments, c. 1945-1965
 - Custom Developments, c. 1950-1973
 - Planned Developments, c. 1950-1973

Single-Family Residential Dwellings

- Four subtypes
 - Prefabricated House, c. 1940-1973
 - Tract House, c. 1945-1965
 - Speculative House, c. 1950-1973
 - Custom House, c. 1940-1973

Types of Suburban Developments

Land development in Indiana in the modern era can generally be subdivided into five distinct periods based on socioeconomic and cultural trends and resultant influences on the homebuilding industry:

- **1940-1945:** World War II period characterized largely by institutional-type developments constructed in response to military and industrial need, located either near associated facilities or with convenient access along major transportation routes;
- **1946-1949:** Readjustment period development characterized predominately by quickly constructed subdivisions of economical housing, commonly near the core of community or first-tier growth areas;
- **1950-1955:** First wave post-war suburbanization period characterized by pervasive construction and the development of hundreds of subdivisions of various sizes that expanded the footprint of communities across the state into the urban-rural fringe;
- **1956-1962:** Second wave post-war suburbanization period characterized by irregularities in the growth cycles of many communities across the state, marked by second- and third-tier expansion and an increase in apartment living; and
- **1963-1973:** Third wave post-war suburbanization period characterized by the juxtaposition of continued community build-out and reevaluation of post-war growth cycles during an era of increasing local regulation.

The housing of the World War II and post-war eras (1940-1973) can be divided into five subtypes that include the following:

World War II-Era Housing Developments, c. 1940-1949

- Established in response to the need to house large numbers of military personnel, industry workers, and veterans.
- Size varied considerably depending on the local need, ranging from dozens of dwellings to more than 100 units.
- Typically established quickly to remedy an immediate shortage; employed a standardized housing model that could be repeated many times over with little to no variation. Prefabricated dwellings are common elements of this type of development.
- In military developments, housing often was of the demountable (movable) variety, with individual units that were indistinguishable from one another. In private developments, the American Small House & Compact Ranch house are common.



Aerial and sample houses from Crane Historic District, Crane, IN

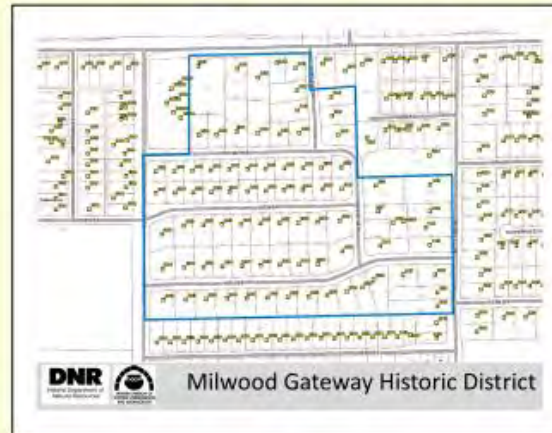


Transitional Developments, c. 1945-1955

- Located within/adjacent to the community core.
- Those platted prior to the war, either partially undeveloped until after 1945 or always intended to be finished later as consumer demand/available financing intersected; others were platted/built-out completely during the period of study.
- Grid plan and made use of existing plats, street layout, and municipal services; made for quick builds in the post-WWII era.
- Combination of traditional street networks with modern housing/emergent concepts of planning/subdivision design; often blurred the line between traditional developments of the late 19th and early 20th centuries and the forthcoming development of the mid-1950s and beyond.
- Dwellings include American Small House and Ranch houses.



Plan and photos from Milwood Gateway Historic District, Columbus, IN



INDIANA'S POST-WAR RESIDENTIAL HOUSING, 1940-1973
QUICK REFERENCE GUIDE FOR SUBURBS

Tract Developments, c. 1945-1965

- Tract Developments were the primary mechanism of domestic development during the post-WWII era.
- Developed by operative or merchant builders.
- Range from a small linear row of dwellings to hundreds of houses along curvilinear/loop roads.
- Developed over time through multiple plats, typically by the same builder or developer.
- Set range of housing models (reinforced the homogeneity and cohesiveness of the development as a singular unit).
- Adhered to FHA requirements, including consistent setbacks/spatial relationship, hierarchical street development plans, minimization of intersections/ corners, accommodation of local topography, and integration of community assets such as green space.
- Typically include American Small House and Ranch types, with some Split-levels and Bi-levels.



Plan and photos from Gladstone Courts Historic District, Columbus, IN



Planned Developments, c. 1950-1973

- Cohesively designed enclaves that integrated housing & other amenities in coordinated master plan.
- Range of forms—mobile home parks, single/multi-family residential developments designed as a cohesive entity with interrelated components (e.g., townhouses & community center); in 1960s-1970s included cluster developments and Planned Unit Developments (PUDs)
- By a large developer, near major transportation corridor, & characterized by commercial nodes/community assets such as schools, parks, & churches.
- Grew substantially and often incorporated as independent communities or annexed into nearby metropolitan areas.
- Distinct sense of identity rooted in the self-sufficient nature of their design, likely reflected in the landscape by the inclusion of independent services such as fire stations, post offices, & civic buildings.



Plan and photos from Parkside Historic District, Columbus, IN

Custom Developments, c. 1950-1973

- Tailored to meet a variety of needs and preferences of the homebuyer/sophisticated consumer.
- Distinguished in their design, layout, & configuration; Crafted to accommodate topography/natural settings/man-made features such as lakes/golf courses (critical selling points).
- Typically less than 100 houses; some larger multi-plat examples were developed; subsequent plats often had slight variations in design/layout/housing stock.
- Architect-designed/custom-designed by a builder; more variation than housing in Transitional and Tract Developments.
- Ranch houses, Split-levels, Bi-levels, & Massed two-story houses are common; also Contemporary, Builder Modern & Neo-Eclectic styles.



Plan and photos from Northlawn Historic District, Columbus, IN



What does the MPDF mean for FHWA projects?

- The MPDF, which provides historic context, helps identify resources through its typology
- Main issue is the *application* of the MPDF—a resource's significance has largely been dismissed by SHPO in favor of the resource simply being 'a representative example'
- Resulting eligibility disagreements have led to increases in the following: 1) CRO review times; 2) Consultant preparation and research; 3) Number of revisions needed on consultant work-products; 4) SHPO coordination; 5) Some project schedules have been adversely impacted




Avalon Hills, Indianapolis
Source: Weintraut & Associates

Commercial Mid-Century



Top: Wishing Well Motel, Franklin, Johnson Co.
Bottom: Tearman Motel, Franklin, Johnson Co.
Source: SJCA

Top: Post Office, La Porte, LaPorte Co. 
Bottom: Daily Journal Building, Franklin, Johnson Co.
Source: Top-Lochmueller Group; Bottom-SJCA

Commercial Mid-Century

- Not much disagreement
- Eligible mid-twentieth century commercial buildings tend to be higher style and very distinguishable
- There is one exception:
 - MOTELS



Cassidy Motel, LaPorte County
Source: Google Streetview

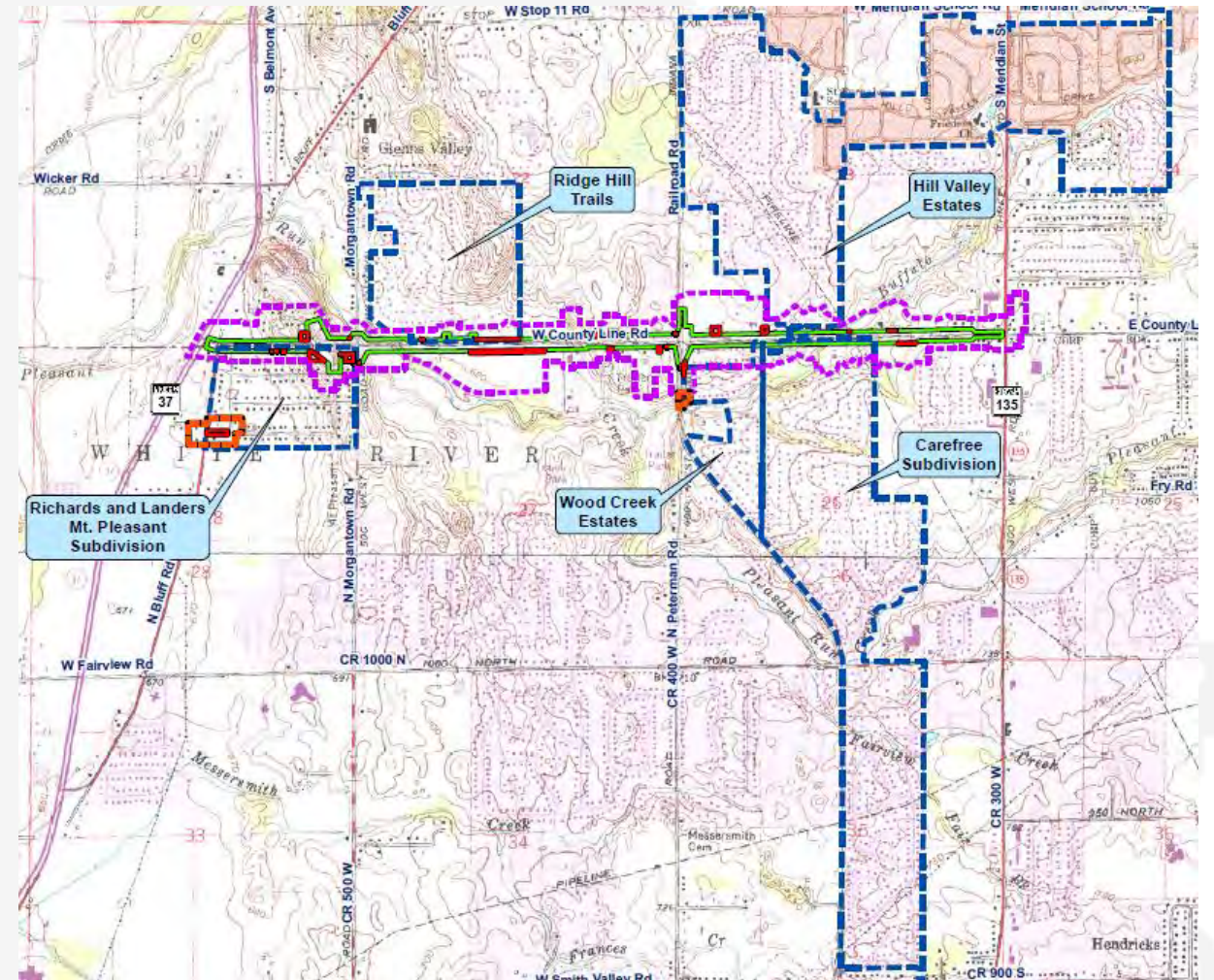
Challenges: Conflation of Significance & Integrity

Significance + Integrity = Eligibility

- Concerning the eligibility of postwar resources, we have seen our SHPO frequently equate significance with integrity without treating these concepts as two necessary halves of a whole.

Keeper Determinations-Added Travel Lane Project

- Project Basics
 - Project occurs on County Line Road
 - Two-lane road to five lanes (two 11-foot lanes in each direction with 13-foot center turn lane) with pedestrian facilities on either side
- HPR recommended no properties as eligible
- SHPO responded that 5 subdivisions were eligible:
 - Richards and Landers Mount Pleasant Subdivision (Transitional- A)
 - Wood Creek Estates (Custom- A & C)
 - Carefree Subdivision (Custom- A & C)
 - Ridge Hill Trails (entry level Custom- A & C)
 - Royal Meadows/Hill Valley Estates (entry level Custom- A & C)



County Line Road Added Travel Lanes
Source: ASC Group, Inc.

Keeper Determinations-Added Travel Lane Project

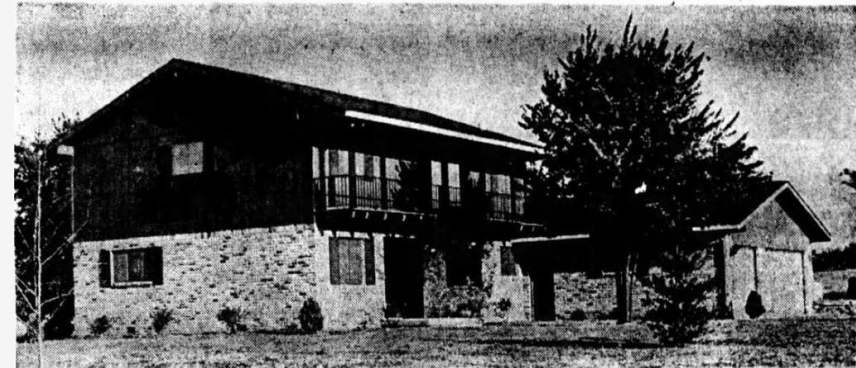
- An addendum HPR was prepared and continued to recommend none of these subdivisions as eligible
- SHPO's response reiterated their original recommendations of eligibility
- INDOT reconsidered its recommendation for one neighborhood—Carefree Subdivision, eligible as a Custom Development (A & C) per the MPDF.
- Keeper determinations sought for the other 4 subdivisions



Carefree Subdivision, Johnson County
Source: ASC Group, Inc.

Keeper Determinations-Added Travel Lane Project

- Mount Pleasant Subdivision: “Not Eligible”
- Wood Creek Subdivision: "Not Eligible"
- Ridge Hill Trails: "Not Eligible as submitted—should re-evaluate Plat 1 individually"
 - Plat 1 was evaluated individually and determined to be eligible (Criterion C)
- Hill Valley Estates: "Eligible property with modified boundaries; Portion in APE not eligible"



Ridge Hill Trails Plat 1, Indianapolis
Source: ASC Group, Inc. (above)
Indianapolis Star 1969 (below)

Keeper Determinations-Norma Jean Subdivision

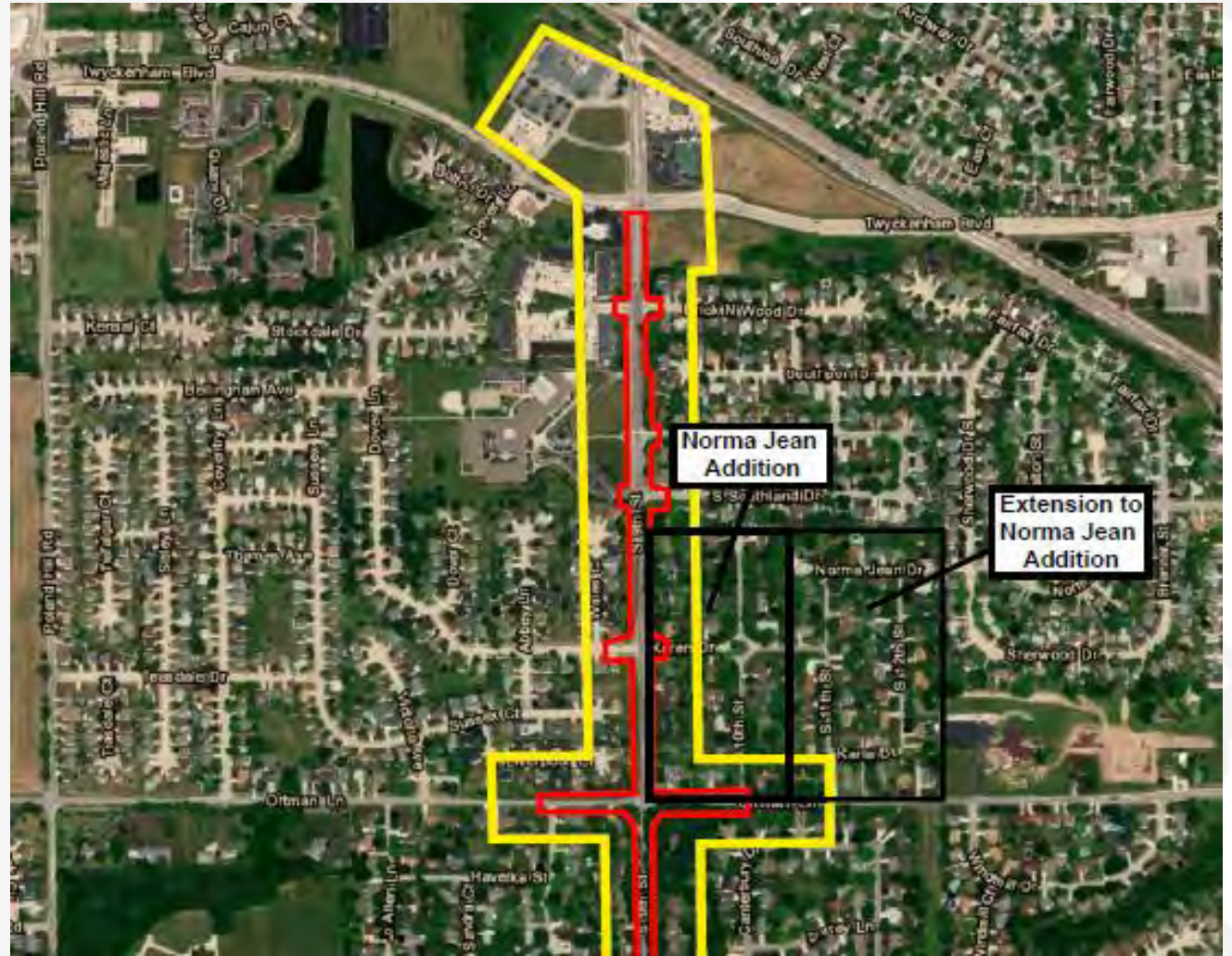
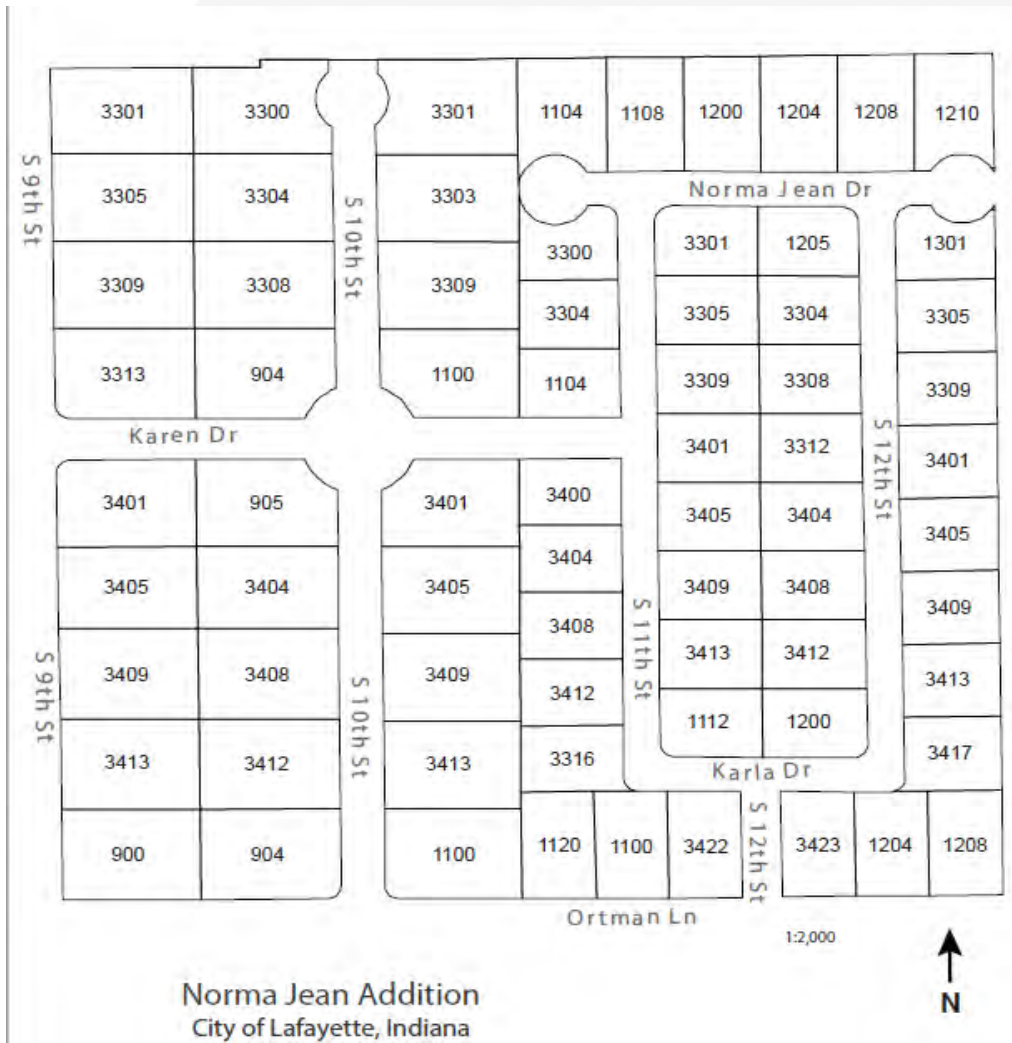
- Project Basics:
 - City of Lafayette, Tippecanoe County
 - Added Travel Lanes with two-way left turn lane and potential mini-roundabout at 9th St. & Ortman Lane
- Developed largely between 1954 and 1968
- Does not fit clearly into specific type but exhibits both Tract and Custom Development features
- Retains moderate overall integrity



Norma Jean Subdivision, Lafayette, Tippecanoe County

Source: Butler, Fairman, & Seufert

Keeper Determinations-Norma Jean Subdivision



South 9th Street Improvement Project
Source: Butler, Fairman, & Seufert

Keeper Determinations-Norma Jean Subdivision



- HPR distributed with no resources recommended National Register-eligible
- SHPO responded and disagreed with the conclusions of the HPR stating that the Norma Jean Subdivision appeared eligible under Criterion A
- An Addendum HPR was prepared with additional information and evaluation that still recommended the Norma Jean Subdivision as ineligible
- SHPO provided a letter responding to the Addendum and noting their continued support of the subdivision as eligible under Criterion A.
- INDOT-CRO and FHWA sought a determination of eligibility for Norma Jean Subdivision from the Keeper.

Keeper Determinations-Norma Jean Subdivision

Summary of Keeper Determination

- "Not Eligible"
- While Norma Jean has a unique layout in the area, this is not enough to exhibit significance under Criterion A: Community Planning and Development
- Basic components of a subdivision type, such as street layout, utilities, house types, are not sufficient alone to support Criterion A: Community Planning and Development.

Takeaways/Patterns from Keeper Determinations

- Recommendations should not focus on classification as examples of types of properties
- Not enough to identify the resource as an unusual/unique example
- Analysis should focus on demonstrating an association with a particular theme or trend that is **significant** in an applicable context

Takeaways/Patterns from Keeper Determinations

- Evaluation of significance within an appropriate context must be made at the level of the whole property/district, not at the level of its components
- Relying on the form and components rather than the whole can mask contraindications for eligibility: incoherent and disconnected plats (Hill Valley), construction predominantly outside the period of significance (Ridge Hill and Wood Creek), construction primarily less than 50 years of age (Wood Creek), no clear association with local, state, or national planning trends (Norma Jean)

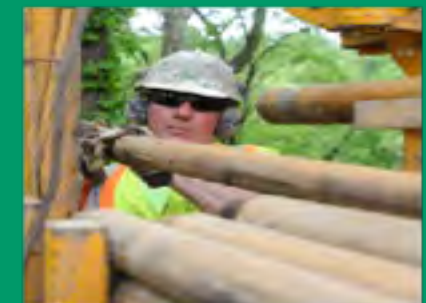
ODOT Peer Exchange Presentation

Presenters:

Erica L. Schneider

Susan Gasbarro

OHIO DEPARTMENT OF TRANSPORTATION SECTION 106 COMPLIANCE & POST-WWII RESIDENTIAL HOUSING



OHIO DEPARTMENT OF
TRANSPORTATION

Ohio Department of Transportation Section 106 Compliance & Post-WWII Residential Housing

Section 106 Compliance & Post WWII Residential Housing

Presented by:

Erica L. Schneider, Assistant Environmental Administrator

Susan Gasbarro, History/Architecture Team Leader

Post-WWII Residential/Commercial Properties & Eligibility

Virtual Peer Exchange

April 11, 2023

ODOT - State of Practice NEPA Assignment

- ODOT & FHWA entered a NEPA Assignment MOU [2015, updated 2018 & 2020]
- ODOT assumes FHWA's responsibilities under NEPA & Section 106
- ODOT acts in capacity of “agency official” for compliance with 36 CFR Part 800

**FIRST RENEWED MEMORANDUM OF UNDERSTANDING BETWEEN
THE FEDERAL HIGHWAY ADMINISTRATION AND THE
OHIO DEPARTMENT OF TRANSPORTATION CONCERNING
STATE OF OHIO'S PARTICIPATION IN THE PROJECT DELIVERY PROGRAM PURSUANT TO
23 U.S.C. 327**

THIS FIRST RENEWED MEMORANDUM OF UNDERSTANDING (hereinafter "MOU") entered into by and between the FEDERAL HIGHWAY ADMINISTRATION (hereinafter "FHWA"), an administration in the UNITED STATES DEPARTMENT OF TRANSPORTATION (hereinafter "USDOT"), and the State of Ohio, acting by and through its OHIO DEPARTMENT OF TRANSPORTATION (hereinafter "ODOT"), hereby provides as follows:

WITNESSETH

Whereas, Section 327 of Title 23 of the U.S. Code (U.S.C.) establishes the Surface Transportation Project Delivery Program (hereinafter "Program") that allows the Secretary of the United States Department of Transportation (hereinafter "USDOT Secretary") to assign and States to assume the USDOT Secretary's responsibilities under the National Environmental Policy Act of 1969 (42 U.S.C. 4321, et seq.) (hereinafter "NEPA"), and all or part of the USDOT Secretary's responsibilities for environmental review, consultation, or other actions required under any Federal environmental law with respect to highway, public transportation, railroad, and multimodal projects within the State; and

Whereas, 23 U.S.C. 327(b)(2) requires a State to apply to participate in the Program; and

Whereas, the State of Ohio expressed interest in participating in the Program with respect to highway projects and enacted laws to allow its participation in the Program; and

Whereas, on April 12, 2015, prior to submittal of its application to FHWA, ODOT published notice of and solicited public comment on its intended application to the Program as required by 23 U.S.C. 327(b)(3), and revised the application based on comments received; and

Whereas, on May 27, 2015, the State of Ohio, acting by and through the ODOT, submitted its application to FHWA for participation in the Program with respect to highway projects; and

Whereas, on October 15, 2015 FHWA published a notice and provided an opportunity for comment on its preliminary decision to approve ODOT's request and solicited the views of other appropriate Federal agencies concerning ODOT's application as required by 23 U.S.C. 327(b)(5); and

Whereas, the USDOT Secretary, acting by and through FHWA, has determined that ODOT's application meets all the requirements of 23 U.S.C. 327 with respect to the Federal environmental laws and highway projects identified in this MOU; and

ODOT - State of Practice

Section 106 Programmatic Agreement

- ODOT, FHWA, ACHP & OSHPO entered into Section 106 PA [2017 amended 2019]
- Revised Section 106 PA circulating for final review & signature [2023]
- ODOT employs two review positions at OSHPO
- ODOT, FHWA, ACHP, & SHPO conduct annual PA review

**PROGRAMMATIC AGREEMENT
AMONG THE FEDERAL HIGHWAY ADMINISTRATION,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
OHIO'S STATE HISTORIC PRESERVATION OFFICE,
AND THE STATE OF OHIO, DEPARTMENT OF TRANSPORTATION
REGARDING IMPLEMENTATION OF
THE FEDERAL-AID HIGHWAY PROGRAM
IN OHIO
(Agreement No. 19319)
(Supersedes Agreement No. 16734)**

WHEREAS, the Federal Highway Administration (FHWA) provides funding assistance to the Ohio Department of Transportation (ODOT) through the Federal-Aid Highway Program (Program) which is subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. 306108), and the implementing regulations 36 CFR §800; and

WHEREAS, the State of Ohio, Department of Transportation (ODOT) administers Federal-Aid Highway Program projects throughout the State of Ohio as authorized by Title 23 U.S.C. 302 and Sections 5501.03, 5501.11 and Chapter 5531 of the Ohio Revised Code (ORC); and

WHEREAS, Title 23 United State Code Section 327 (23 U.S.C. 327) allows the U.S. Department of Transportation (USDOT) Secretary, acting through FHWA, to assign responsibilities for compliance with the National Environmental Policy Act of 1969 (NEPA) and other Federal environmental laws to a State Department of Transportation through a Memorandum of Understanding (MOU); and

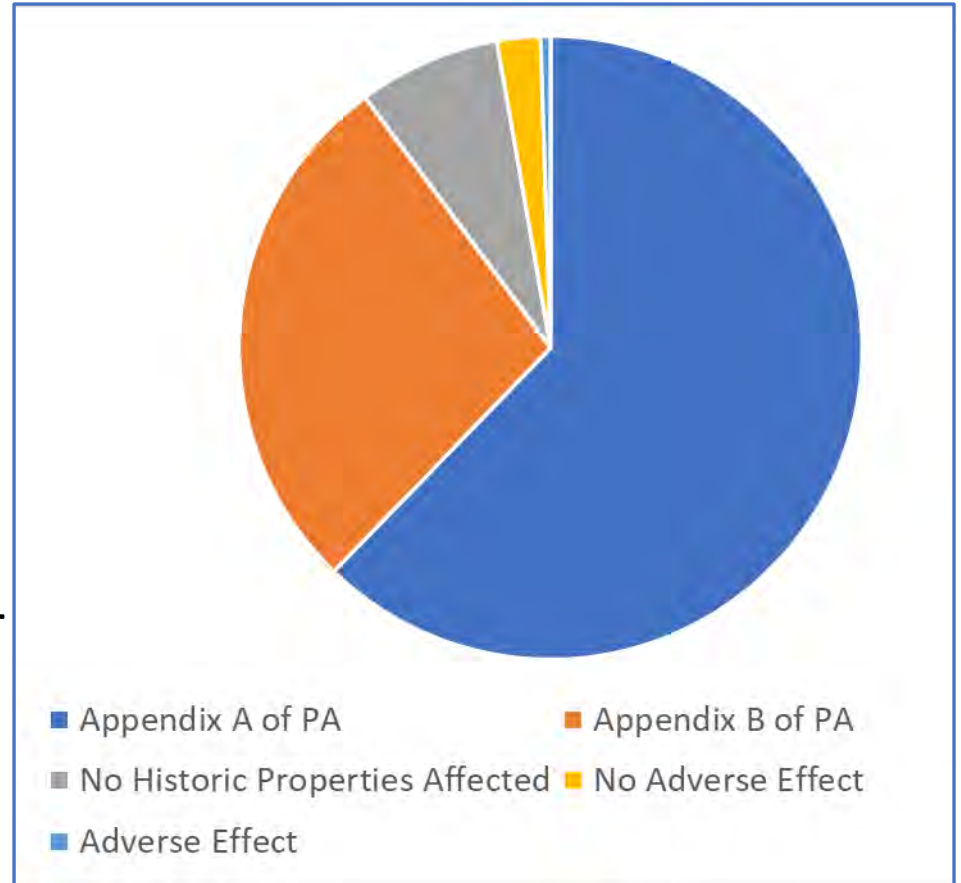
WHEREAS, ODOT and FHWA entered into a NEPA Assignment Memorandum of Understanding (MOU) concerning the state of Ohio's participation in the Program in which FHWA assigned and ODOT assumed FHWA's responsibilities under NEPA and Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) and associated implementing regulations at 36 CFR § 800; and

ODOT - State of Practice Section 106 PA

- Annual Section 106 PA review [2021-2022] included 1,003 project actions.
- Section 106 PA provides for approval specific types of actions without OSHPO review:
 - Appendix A type actions maybe processed by District
 - Appendix B type actions processed by OES-CR staff

ODOT - State of Practice & Section 106 PA

- Appendix A - No potential & Minimal Potential to Cause Effects—Cleared at District
- Appendix B – Minimal Potential to Cause Effects—Cleared at OES
- No Historic Properties Affected and No Adverse Effect—15-day review by SHPO
- Adverse Effect—30-day review by SHPO



ODOT - State of Practice & Section 106 PA

EnviroNet – ODOT's Environmental Documentation System

- SHPO & Tribes notified through system when project review is uploaded
- SHPO & Tribes are provided access to project file
- Consulting Parties are notified via email (US mail if email not available)



Existing Contexts – Post WWII Properties

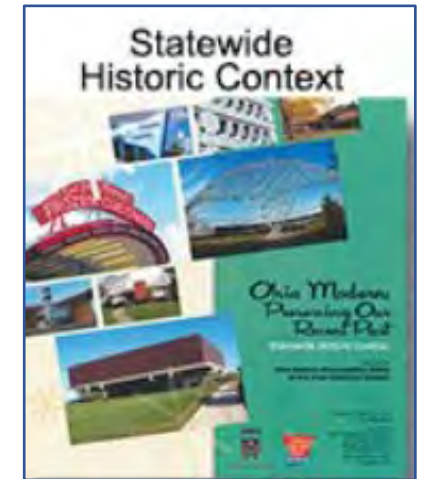
OSHPO Ohio Modern Preserving Our Recent Past Statewide Context (1940-1976)

Ohio's State Historic Preservation Office Contexts

Ohio Modern – Preserving Our Recent Past Statewide Context

Dayton and Surrounding Area Survey Report (2010)

Cuyahoga County Survey Report (2017)



[Ohio Modern Preserving Our Recent Past - Ohio History Connection](#)

Existing Contexts – Post WWII Properties

OSHPO Ohio Modern Preserving Our Recent Past Statewide Context (1940-1976)

Dayton and Surrounding Area Survey Report (2010)

- Survey of select areas & communities (1940-1970)
- 506 resources surveyed
- Representative examples of property types, uses, styles, ages, & condition
- “List of Potential NR Eligible Properties” & areas requiring additional investigation

OHIO MODERN: PRESERVING OUR RECENT PAST DAYTON and SURROUNDING AREA SURVEY REPORT



Prepared for:
Ohio Historic Preservation Office of the Ohio Historical Society

Prepared by:
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Nathalie Wright, Historic Preservation Consultant
P.O. Box 10582
Columbus, Ohio 43201

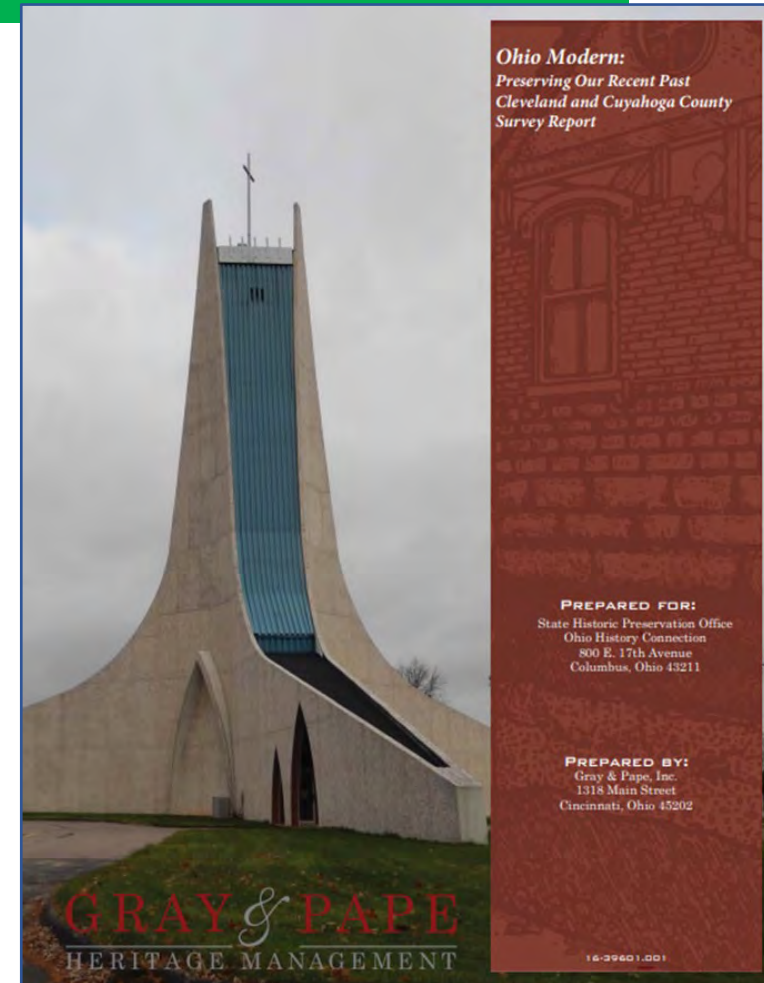
September, 2010

Existing Contexts – Post WWII Properties

OSHPO Ohio Modern Preserving Our Recent Past Statewide Context (1940-1976)

Cuyahoga County Survey Report (2017)

- Survey of select suburban communities & individual locations (1940-1976)
- 600 resources surveyed
- Representative property types, uses, styles, ages, condition & characteristics
- Refers to NPS bulletins & National MPD to determine NR eligibility



ODOT-OES Current Approach Post WWII Properties

ODOT **APE** based on:

- Context and intensity of undertaking
- Likelihood of impacting a Historic Property if present
- Historic context & setting
- Public & Consulting Party input

ODOT **objective**:

- Compliance with 36 CFR 800
- Survey resources where impacts may occur
- Provide for public & Consulting Party input
- Avoid & minimize effects to Historic Properties

**ODOT & OSHPO's
Current Approach to
Post WWII
Development
Project-by-Project
Review**

ODOT-OES - Challenges

Post WWII Residential Properties

OSHPO **APE** based on:

- If any portion of parcel is within project limits, National Register evaluation is required to comply with 36 CFR 800
- Potential eligibility of resources in larger study area

OSHPO **Objective:**

- Compliance with 36 CFR 800
- Avoid effects to Historic Properties
- Consider public & Consulting Party concerns
- Survey, document, & identify National Register eligible resources
- Preservation



ODOT-OES - Challenges

Post WWII Residential Properties

ODOT's Challenges:

- Parcel boundaries abut the edge of pavement or go to the center-line
- Evaluation of all properties along corridor, intersection, or within a development is often not warranted
- Creates additional project costs, review time, documentation, and coordination
- Previous attempts to develop an agreement to programmatically address Post WWII properties with SHPO have been unfruitful.

ODOT-OES - Challenges

Post WWII Residential Properties

ODOT's Challenges:

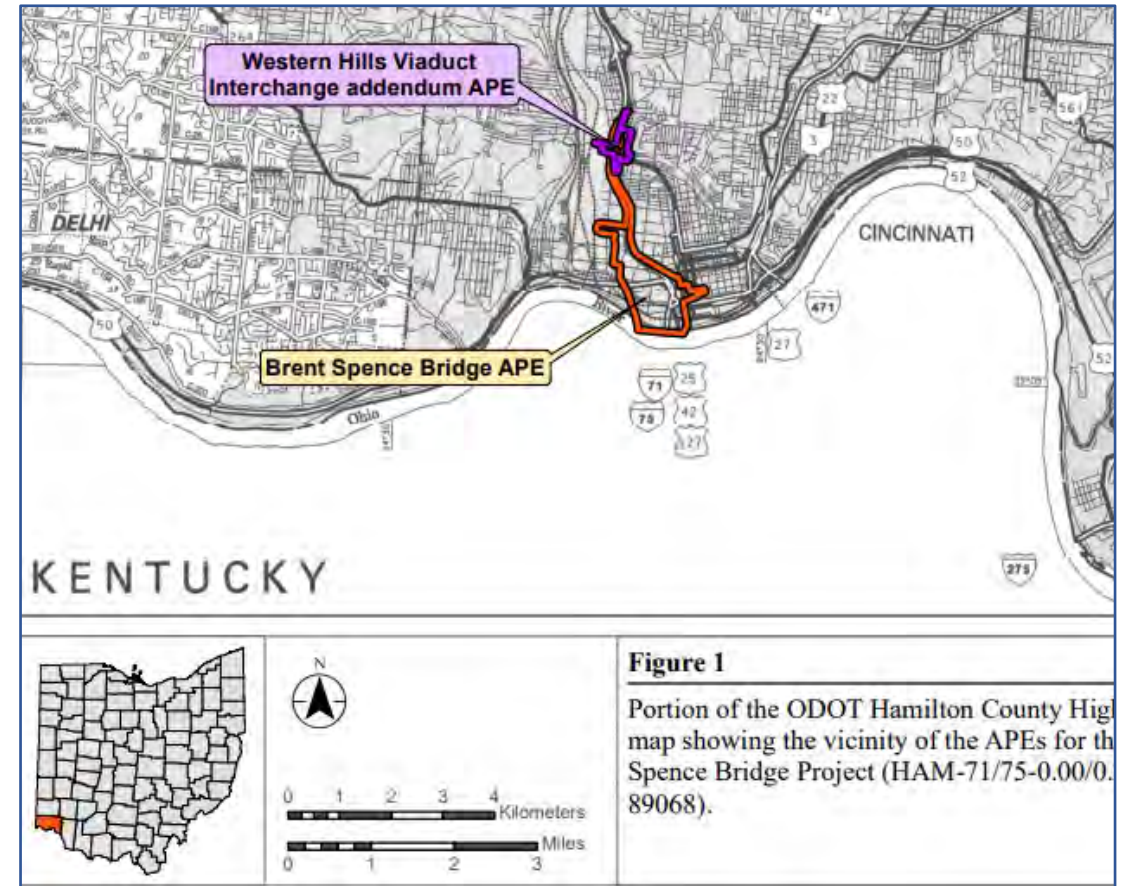
- More properties reach 50 years every day.
- As more projects are re-evaluated we are having the same discussions



ODOT-OES – Project Challenge Examples

HAM-Brent Spence Bridge PID 89068 Supplemental EA

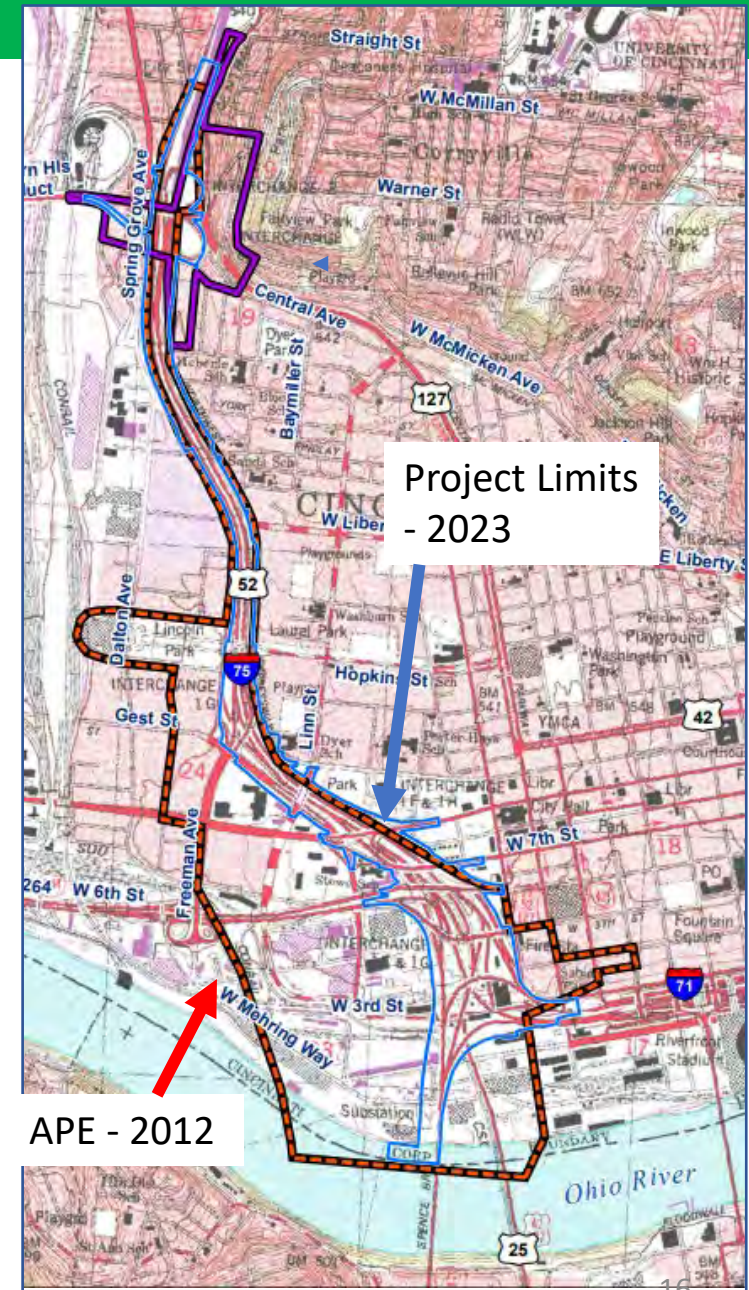
- BSB spans Ohio River between Cincinnati & Kentucky
- FHWA issued FONSI (2012)
- Preferred Alternative refined & Supplemental EA initiated (2022-2023)



ODOT-OES – Project Challenge Examples

Reevaluation of Section 106

- Alternative **project limits** [Refer to **blue line**]
- Phase I History/Architecture reevaluation survey encompassed original **corridor APE** for consistency [Refer to **red line**]
- Phase I History/Architecture survey
 - No newly identified NR eligible resources or districts
 - Including resources 50+ years old since 2012 survey



ODOT-OES – Project Examples

- OSHPO recommended survey of larger APE than was originally evaluated to include the west side of Cincinnati:

“Resources in the report and APE, and those outside of the APE, are associated with the Queensgate Development, which is likely a significant theme under Criterion A for a type of Urban Renewal effort. It is not clear that there is not an historic district potential, **as there are potential resources beyond boundary of the APE that are not considered due to the scope of the project.** Therefore, **SHPO does not agree that there is definitively not a historic district present.**”

ODOT-OES – Project Challenge Examples

HAM-BSB PID 89068 Supplemental EA

ODOT consulted with OSHPO and confirmed:

- Historic context of Queensgate included in survey was sufficient to evaluate resources within the APE
- Impacts within Queensgate limited to minor ROW from two properties
- OSHPO concurred no additional investigations were warranted

However, this process took weeks to get through.

ODOT-OES – Project Challenge Examples

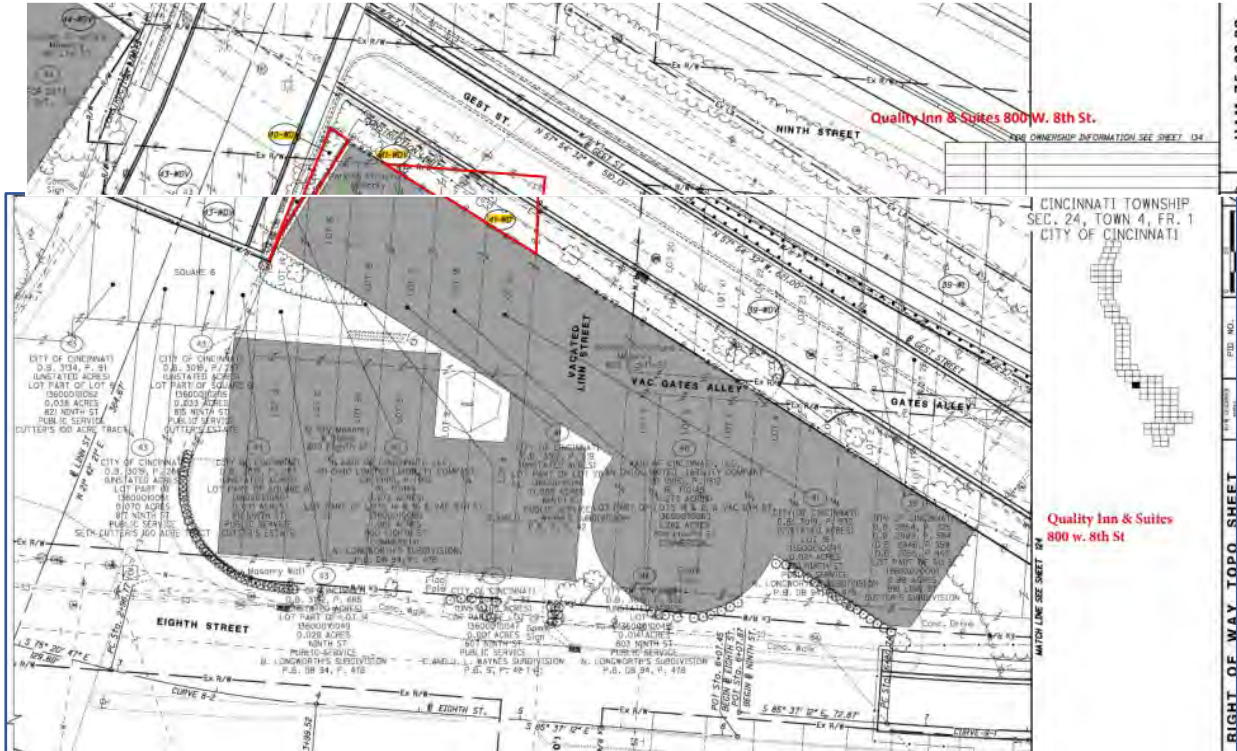
HAM-BSB PID 89068 Supplemental EA



Queensgate I - Church (1971) Temporary ROW limited to tree lawn & edge of asphalt parking lot

ODOT-OES – Project Challenge Examples

HAM-BSB PID 89068 Supplemental EA



Queensgate I - Hotel (1964) with covered parking facility – ROW required adjacent to existing interstate bridge & parking facility

ODOT-OES – Project Challenge Examples

FRA-Far East Freeway PID 95639 NEPA Reevaluation

- Original Phase I History/Architecture Survey [2012] - APE encompassed feasible alternatives
- Phase I History/Architecture Survey Reevaluation [2021] - APE limited to preferred alternative



ODOT-OES – Project Examples

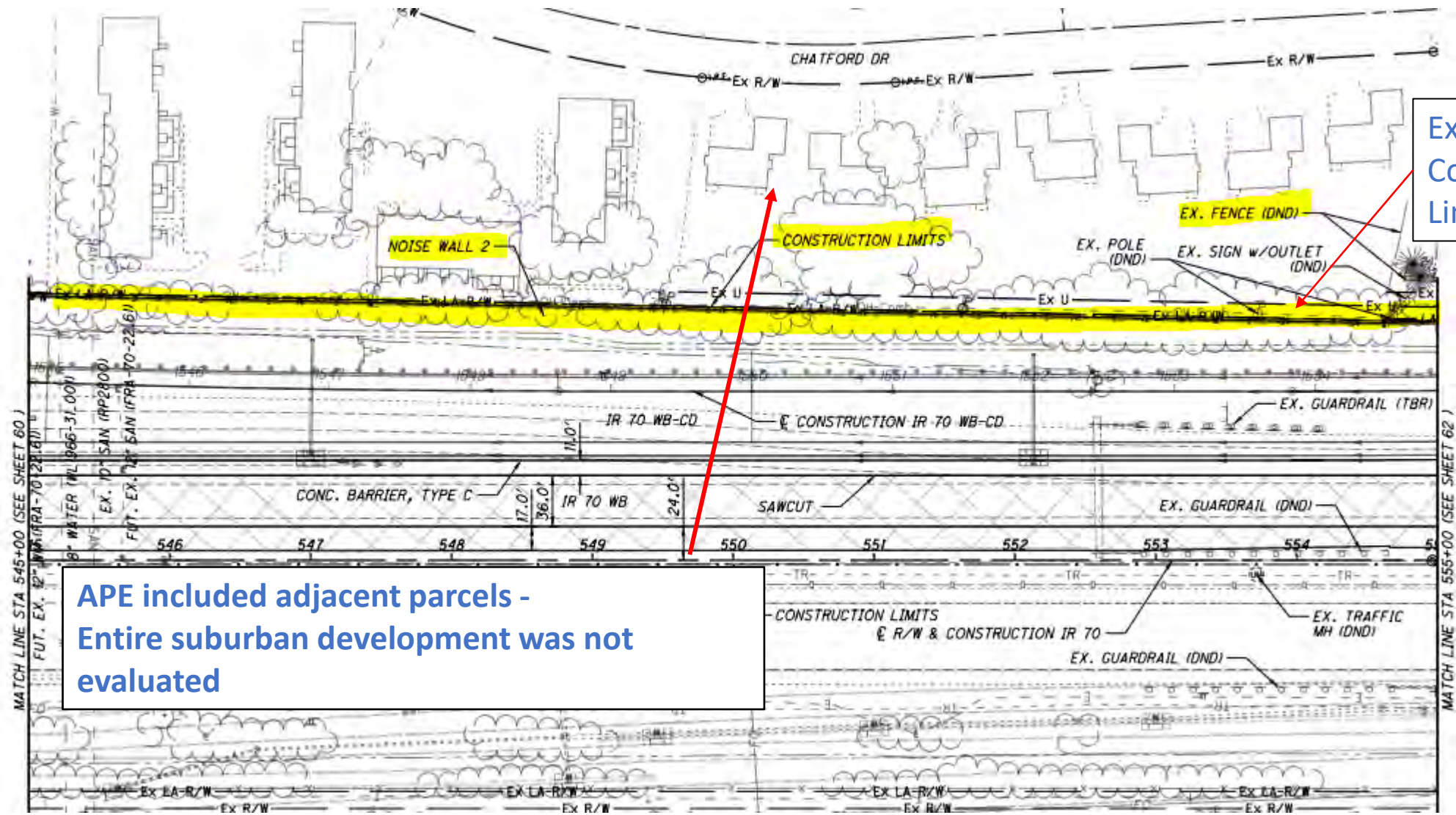
FRA-Far East Freeway PID 95639 NEPA Reevaluation

- Individual Post WWII residential properties evaluated
- OSHPO agreed with effect finding – no historic properties affected
- OSHPO noted in the future, the entire suburban development should be included in survey



Far East Freeway Reevaluation (FRA-70 22.61 PIDs 95639 & 98232)
L&A Project Number: 21-0249

Photographs taken by Brett Carmichael, Lawhon & Associates, Inc.
November 12, 2021



Existing ROW & Construction Limits

APE included adjacent parcels - Entire suburban development was not evaluated

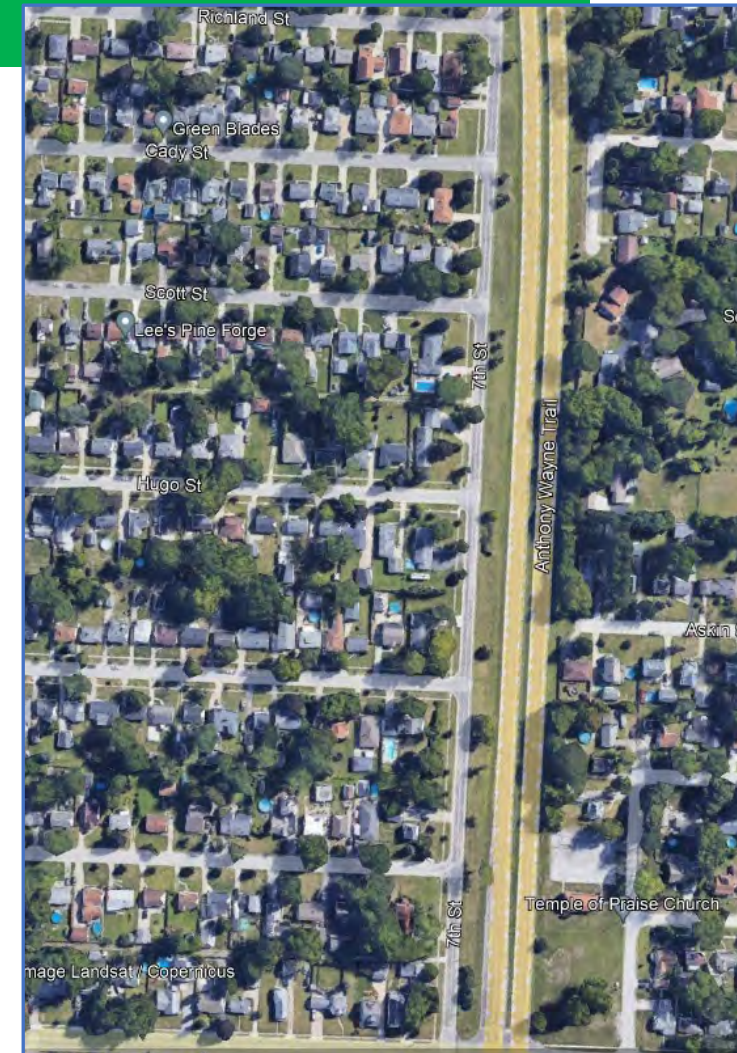
ODOT-OES Research Proposal Study –2023

“Evaluations Methods for Ohio’s Post WWII Residential Properties”

- Intent to use results of research study to develop agreement with OSHPO
- Programmatically evaluate Post-WWII residential properties
- Streamline Section 106 survey and agency reviews
- Model for evaluating individual and grouped properties for National Register in Ohio
- Step-by-step guide to use during eligibility determinations

Summary

- No major issues with identifying and evaluating post-WWII residential housing yet
- Some issues with post-WWII commercial properties and/or developments
- Anticipate future concerns with residential properties/neighborhoods based on comments received on past projects
- Research project is latest effort to try to get to a programmatic approach



Questions?

Erica L. Schneider, Assistant Environmental Administrator

Erica.Schneider@dot.ohio.gov

Susan Gasbarro, History/Architecture Team Leader

Susan.Gasbarro@dot.ohio.gov

GDOT Peer Exchange Presentation

Presenters:

Heather Mustonen

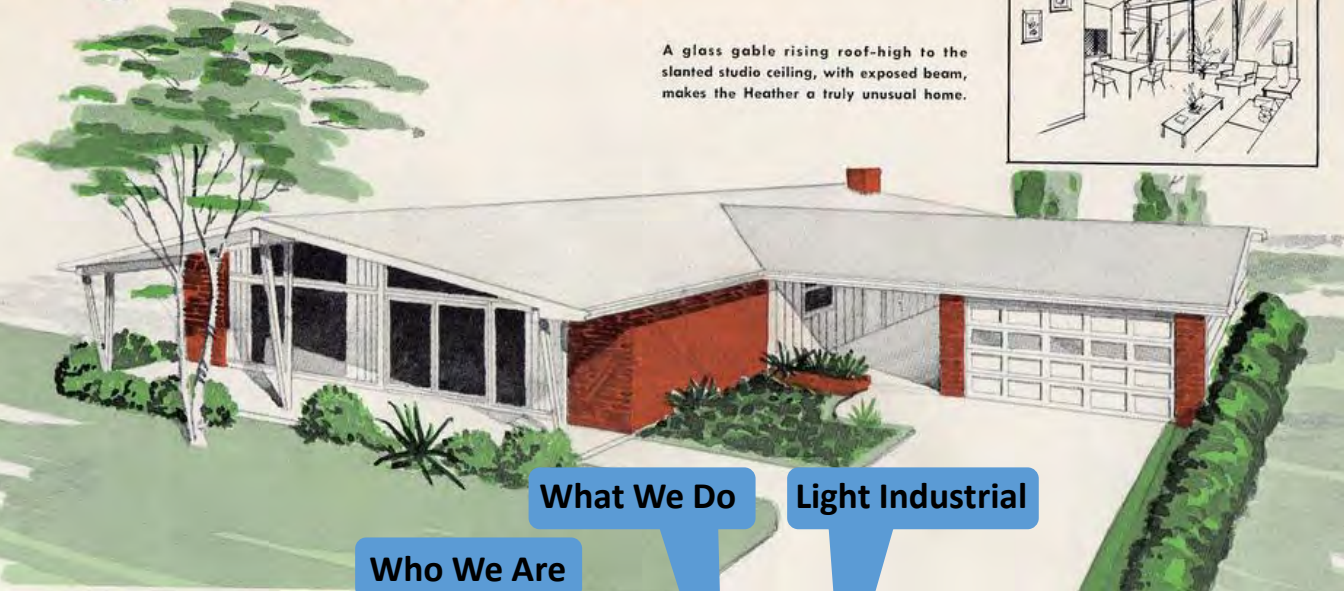
Madeline Henderson




Peer Exchange: Post WWII Residential and Commercial Properties

April 12, 2023

LINCOLN HOMES *Heather*



A glass gable rising roof-high to the slanted studio ceiling, with exposed beam, makes the Heather a truly unusual home.



Who We Are

What We Do

Light Industrial

Ranch Houses


Warehouses

Size 28'x50'; 1176 Sq. Ft. Living Area

The Heather represents modern styling at its very best. An entire wall of glass, with sliding glass doors opens onto a covered patio.

Adding to the Heather's distinction is the studio-type living room with exposed beam. Bedrooms have roomy "walk-in" sliding door closets and the kitchen features a U-shaped breakfast bar.

Exterior elevations are handsomely finished in brick combined with vertical plywood and batten strips.



Lincoln Homes Furnish:

Basic Home	\$4,345
Interior Trim	1,035
Sheetrock	310
Plumbing Package	495
Wiring Package	250
Heating Package (Gas)	595
Kitchen Package	690
Total	\$7,720
To Erect Shell	950
	\$8,670

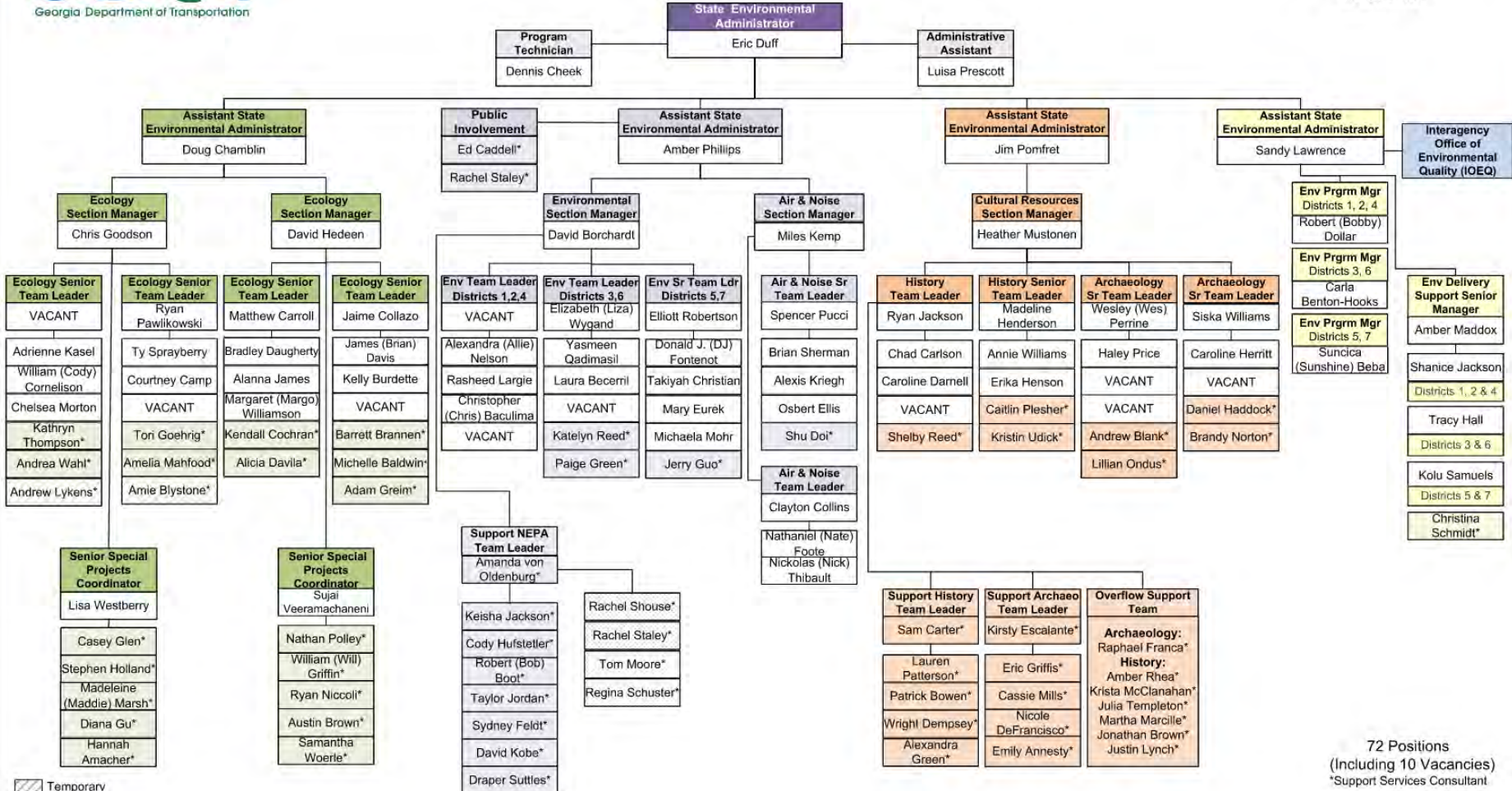
Erection Prices Higher in Northern Ohio
PRICES INCLUDE WOOD AWNING-TYPE WINDOWS
Breezeway and Garage Extra
tax & freight to your lot

1100 PLAN SERIES

Who We Are

Office of Environmental Services

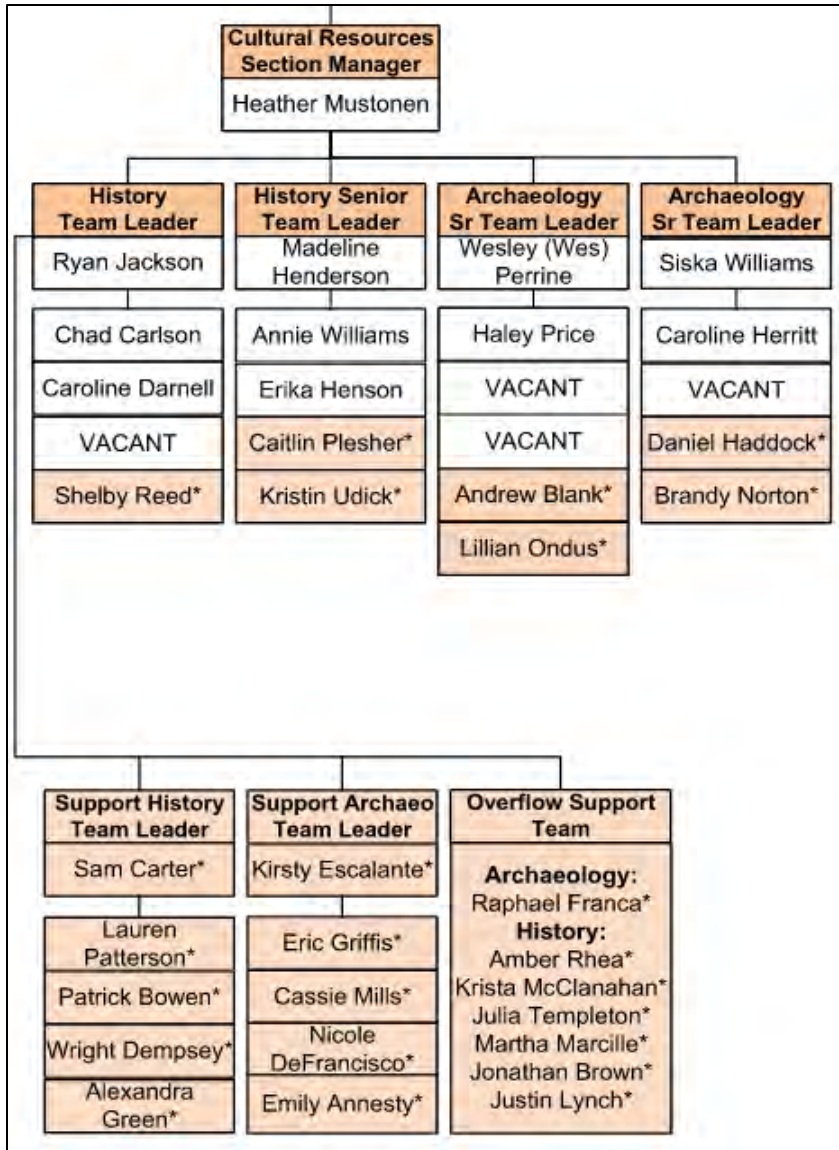
Georgia Department of Transportation
 One Georgia Center, 16th Floor
 600 West Peachtree Street, NW
 Atlanta, Georgia 30308
 404-631-1100



Temporary
 Part-Time

72 Positions
 (Including 10 Vacancies)
 *Support Services Consultant

Current as of 02/20/2023



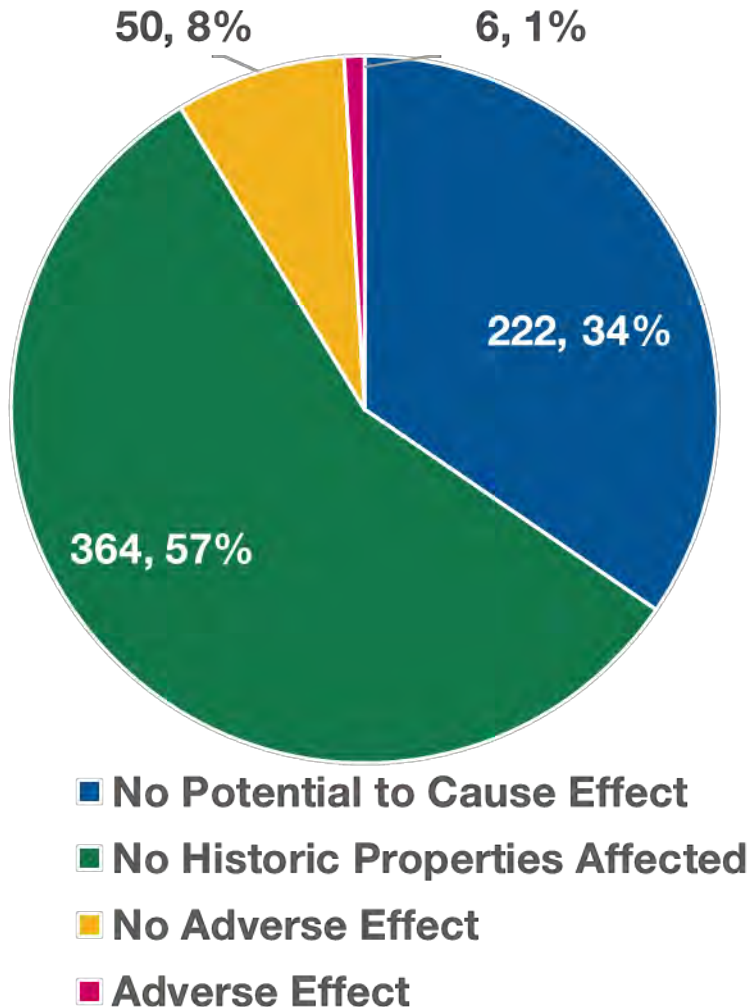
What We Do

Section 106 and GEPA Compliance

- Identification and Evaluation
 - Is it Section 106 or GEPA?
 - Consultation
 - Minor Project Agreements
 - APEs
- Avoidance and Minimization Measures Meeting – A3M
- Assessment of Effects and Memorandum of Agreements
 - NHPA, No Adverse Effect
 - Adverse Effect
 - Mitigation and its challenges



Summary of Section 106 Findings



- 2022 Total Findings – 642
 - Does not include GEPA projects
- Approximately 1200 SHPO submittals in 2022
 - Notifications, Survey Reports, AOE's, MOA's, and Reevaluation Memos
- NPTCE projects reviewed by GDOT staff for applicability and reported on annually to agencies and tribes.
- Per 106 PA, no SHPO concurrence is required on (most) NHPA findings.
- Majority of adverse effects are bridge projects, followed by widenings, bypasses/new locations, and interchanges



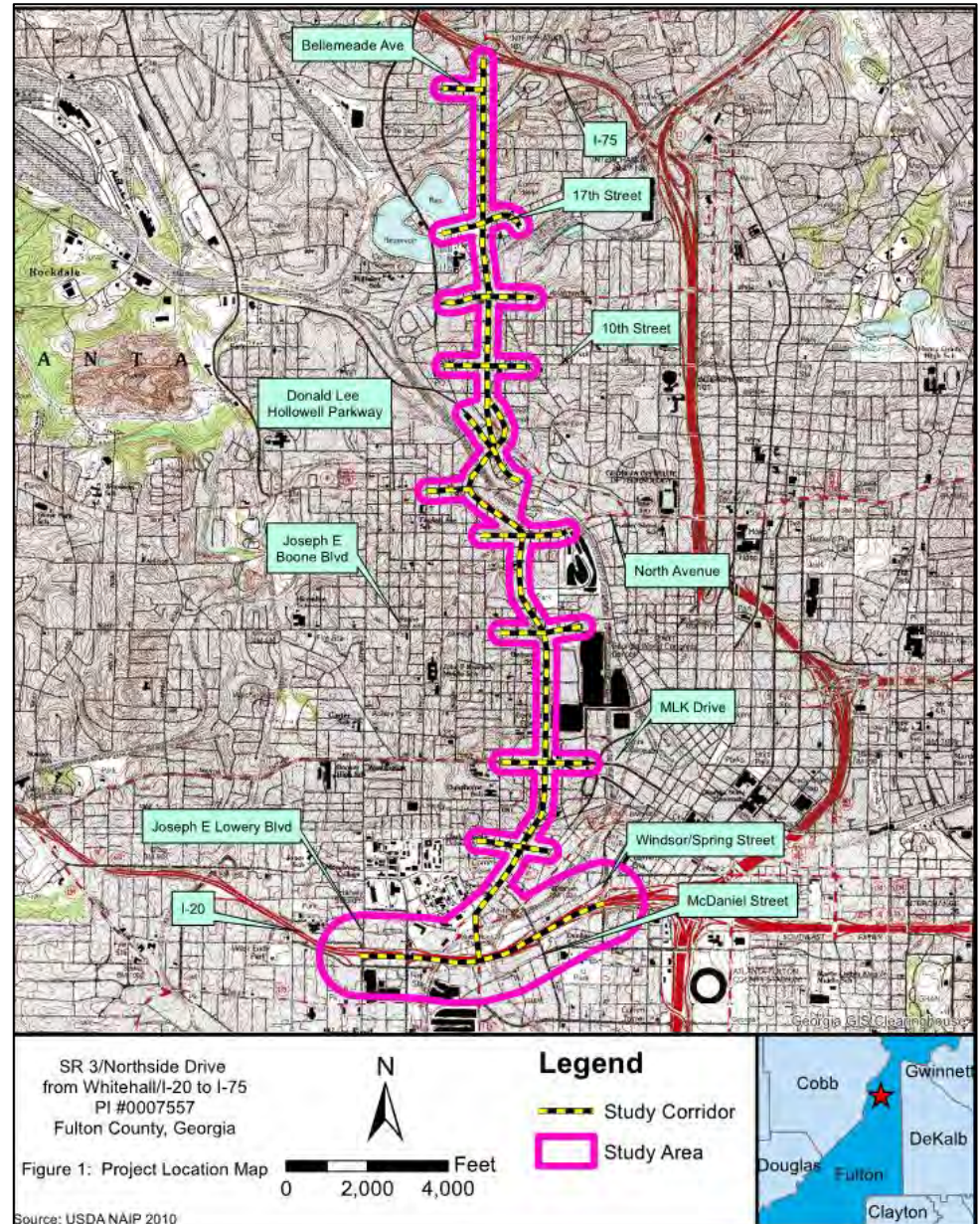
coming soon

- Upcoming Efforts
 - PA expires December 2024
 - Activities to add to minor projects list
 - Defining discrete APEs for certain project types
 - Corps' new position (TBD) on Appendix C
 - Finalization of Cemetery Context
 - Update to Georgia Historic Bridge Inventory
 - Initiating updates to Georgia's Living Places

Light Industrial and Warehouses

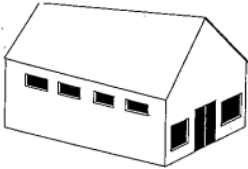
**GDOT Project CSHPP-0007-00(557),
Fulton County, P.I. #0007557**

- Corridor study of Northside Drive, from I-20 to I-75
- Developed in 1940s, constructed in 1950s
- Part of Lochner Plan for Atlanta to address traffic and city planning
- Encouraged industrial sites to relocate to semi-rural areas, maintaining access to rail, but...
- Ever increasing reliance on autos and trucks
- Plan required parking areas for truck loading
- Resulted in numerous light industrial and warehouse historic properties



COMMERCIAL TYPES IN GEORGIA

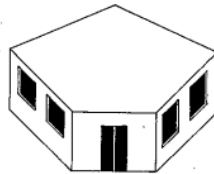
Community Store



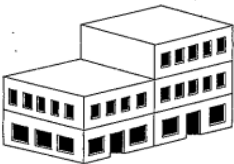
Still a familiar part of rural Georgia scenery, community stores are also found in residential neighborhoods and on the fringes of small towns. Commonly built between the 1890s and the 1930s, community stores were typically general merchandise stores, front-gabled with covered porches and sometimes parapet roofs. The storefronts were normally symmetrical—a central entrance flanked by windows—and the sides were typically lighted with small windows toward the top, above the shelves lining the interior.

The urban equivalent to the community store, corner stores were usually general merchandise or grocery stores. Built mostly from 1900 through the 1940s in residential or mixed use neighborhoods, they were oriented toward street corners by way of angled corner entries. Corner stores were most often detached buildings.

Corner Store



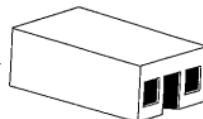
Retail & Office



The single most common commercial type in Georgia, the retail & office type was successful because of the combination of retail space on the street level and rental office space above. Built mostly in the 1880s through the 1930s, this type was typically 2- to 4-stories high with flat or sloped roofs, built either as single units standing alone or as multiple units with party walls. The type was popular in small towns to large cities and even, surprisingly, in some crossroads communities.

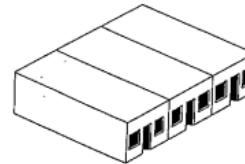
Serving a wide variety of retail uses, the single retail type is a single unit built either standing alone or next to others. Built mostly in the 1880s through the 1950s in small to large towns, single retail buildings had flat or sloping roofs and usually 3-bay facades.

Single Retail



SHPO's commercial building typologies works great if the historic property is 19th or early 20th century....

Multiple Retail



In this commercial type, two or more identical retail units were built together for rental income. One story high with flat or sloping roofs and identical facades and storefronts, usually 3-bay, multiple retail buildings were built mostly in the 1910s through the 1950s in small towns or urban settings.

Tall office buildings construction was almost limited to the largest cities, and even there, they did not form many dense districts. Typically six or more stories high with retail space at ground level, historic office towers were built mostly in the 1910s through the 1920s.

Office Tower



Identification Methodology

Light Industrial Type

- **Used for production or manufacturing of a product**
- Masonry
- Rectangular or square; other shapes too
- Horizontal, low orientation
- Flat or low pitched roof
- **Multiple raised loading bays; number is not as important since purpose is production**
- **Office/retail space towards front; stylistic details common**
- **Use of windows in office and industrial area**
- Near major roadways and rail
- Ample parking with area for truck turn-around

Warehouses

- **Main use for storage of goods**
- Masonry
- Rectangular or square, other shapes too
- Horizontal, low orientation
- Flat or low pitched roof
- **Multiple raised loading bays, especially intermodal loading bays**
- **May have office area; less prominent and integrated into main building**
- **Windows less likely**
- Near major roadways and rail
- Ample parking with area for truck turn-around

Light Industrial

- Lockheed Nuclear Products
- Constructed 1952
- Flat roof, clear separation of office, multiple loading docks, parking area
- Minor alterations



Light Industrial

- Raybestos-Manhattan; auto brakes
- Constructed 1960
- Flat roof, clear separation of office, multiple loading docks, windows within industrial area, parking
- Significant alterations

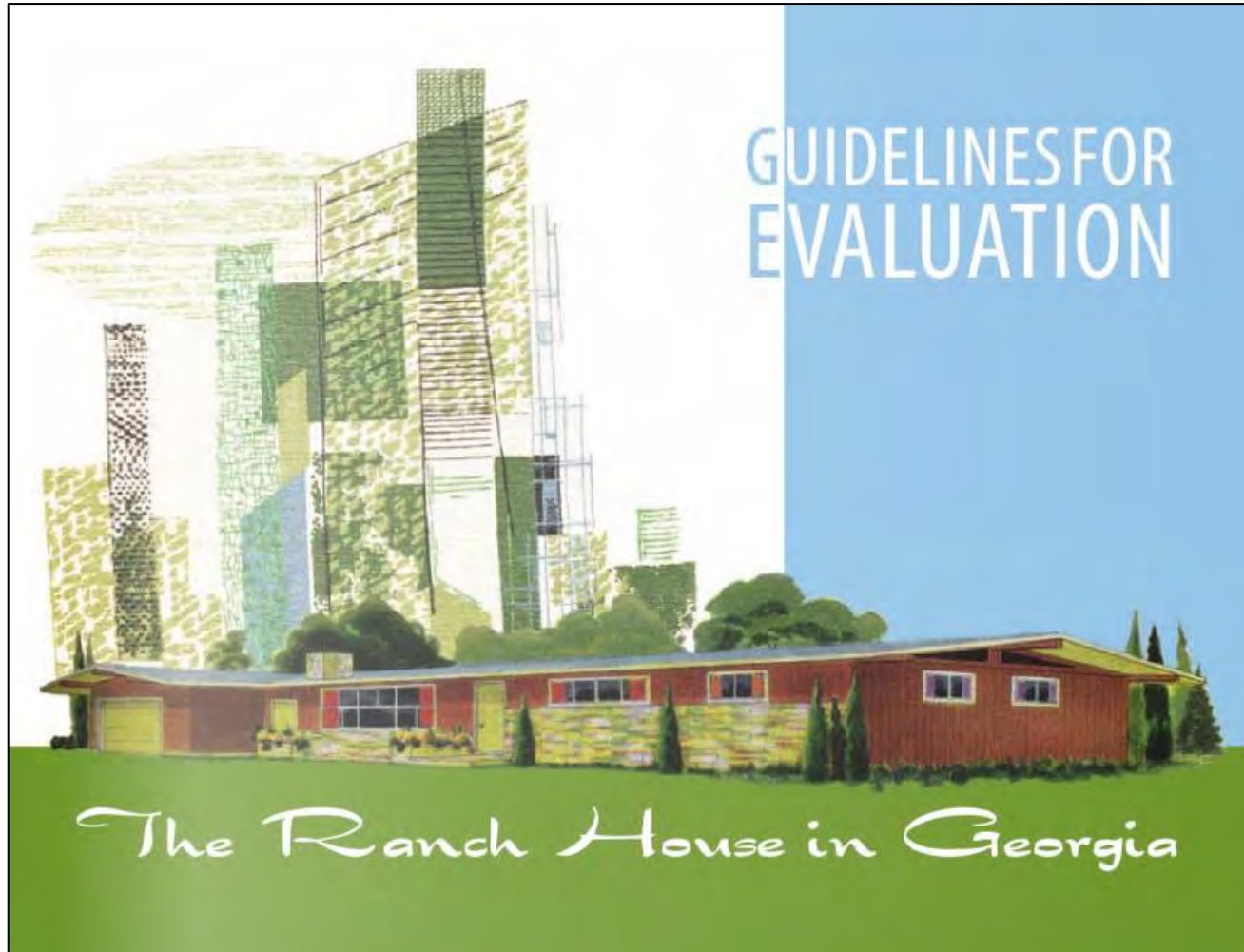


Warehouse

- Right – Hanes Supply Company, constructed 1960; below – Inland Container Group, construed 1955
- Constructed 1960
- Flat roof, discreet office, multiple loading docks, minimal windows
- Enclosed bays, roof alteration



Ranch Houses: Now and Beyond



Before we discuss now and beyond, let's go back in time...

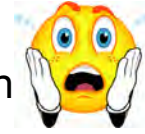
- Not a new typology
- Late 2004 and into 2005, uptick in number of eligibility disagreements, starting with one house in particular



The Ranch that started it all...



Clearly, we were not on the same page...

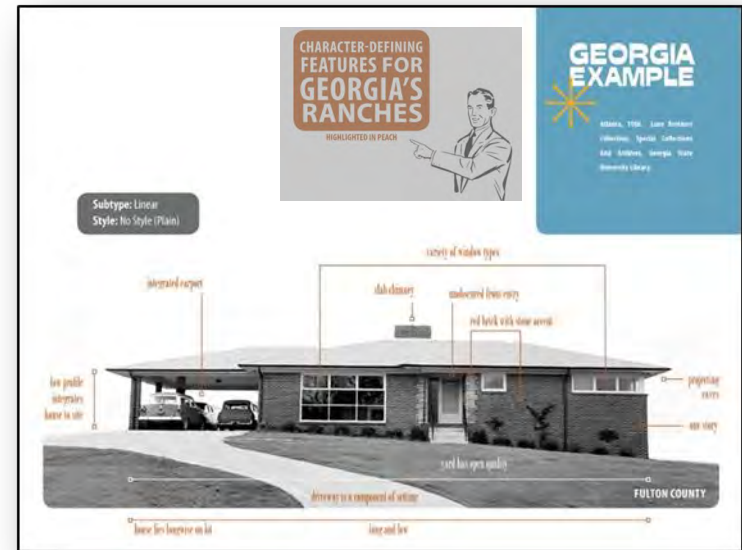


- Series of strongly worded letters back and forth
- Held several interactive meetings between HPD and GDOT staff – as well as consultants – to form general framework of common features
- Led to creation of a ranch house focus team – Ranch Assessment Team – RAT
- GDOT worked with Georgia Transmission Commission, who contracted New South Associates to take the foundation of the context and develop it into the final



The Ranch House Context Provides:

- Origins of the ranch house
- Subtypes
- Character defining features
- Assessing the “ranch-ness” of a ranch house
- Integrity considerations



COMPACT RANCH SUBTYPE

DESIGN W 467
1937
1937

This simple entry is defined by its low profile, horizontal lines, and a prominent porch. The house is a single-story structure with a low-pitched roof and a prominent front porch. The porch is supported by thick columns and has a flat roof. The house is surrounded by a lawn and trees.

WARD McFARLAND, DED. 1937
(Source: Pullman 1937)

COMPACT
This type is small and simple. It is proportionately a rectangle but almost square in form with a length-to-width ratio of less than 2:1. The house can be expanded with a carport.

Subtypes
Eight common Ranch House subtypes based on massing and floor plans have also been identified: the Compact Ranch, Linear Ranch, Linear With-Clusters Ranch, Courtyard Ranch, Half Courtyard Ranch, Bungalow Ranch, Rambling Ranch, and Alphabet Ranch. These subtypes are not critical to developing an evaluation of a Ranch House. Instead, they are intended to provide surveyors with a better descriptive language for the architecture of the Ranch House type and a more detailed classification scheme.

**Remember... a building type is the overall form of a building and its interior plan.*

44

COURTYARD RANCH SUBTYPE

COURTYARD
The Courtyard Ranch House has at least two wings that embrace a courtyard, typically on the front. Some examples have slight or diminutive wings that suggest the presence of a courtyard.

BRAN - NEW HOMES
1934
1934

This house was the first in the United States to be built with a courtyard. The architect, Lela Hyde Wilbur, was inspired by the courtyard houses of the Mediterranean and the Spanish. The house is a single-story structure with a low-pitched roof and a prominent front porch. The porch is supported by thick columns and has a flat roof. The house is surrounded by a lawn and trees.

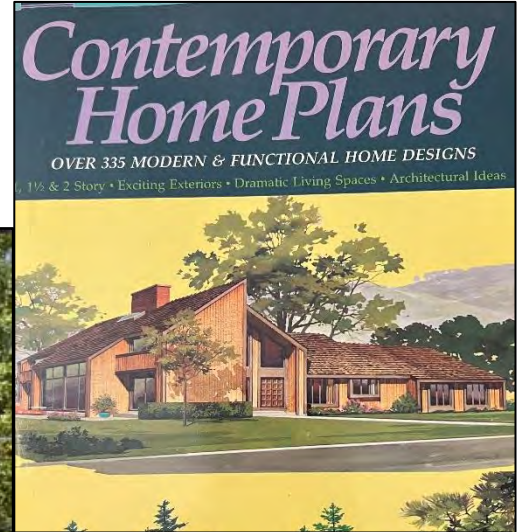
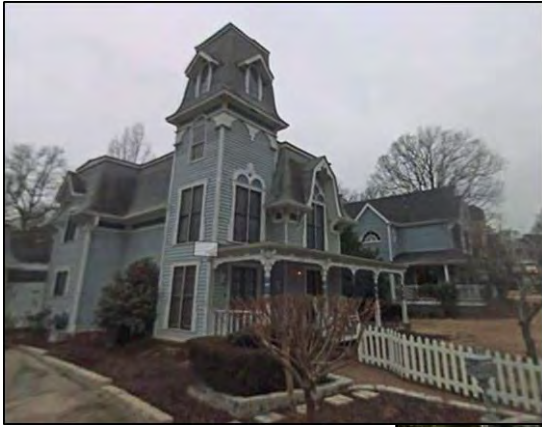
(Source: Wilbur n.d.)

47

The Challenges:

- Established significance to 1969
- Can “long and low” describe later ranch houses?
- Can subtypes be applied to later ranch houses?
- Does this next generation have own unique set of features?
- New styles introduced?
- What would be the end date of the period of significance?







END

CDOT Peer Exchange Presentation

Presenter:

Barbara Stocklin-Steely



COLORADO

Department of Transportation

PEER EXCHANGE POST-WWII RESIDENTIAL AND COMMERCIAL PROPERTIES

Barbara Stocklin-Steely, CDOT Region I Senior Historian
Barbara.Stocklin@state.co.us

FHWA-Colorado

- CDOT authorized to conduct Section 106 on behalf of FHWA under our PA
- CDOT coordinates with FHWA when projects have “adverse effects” on historic properties

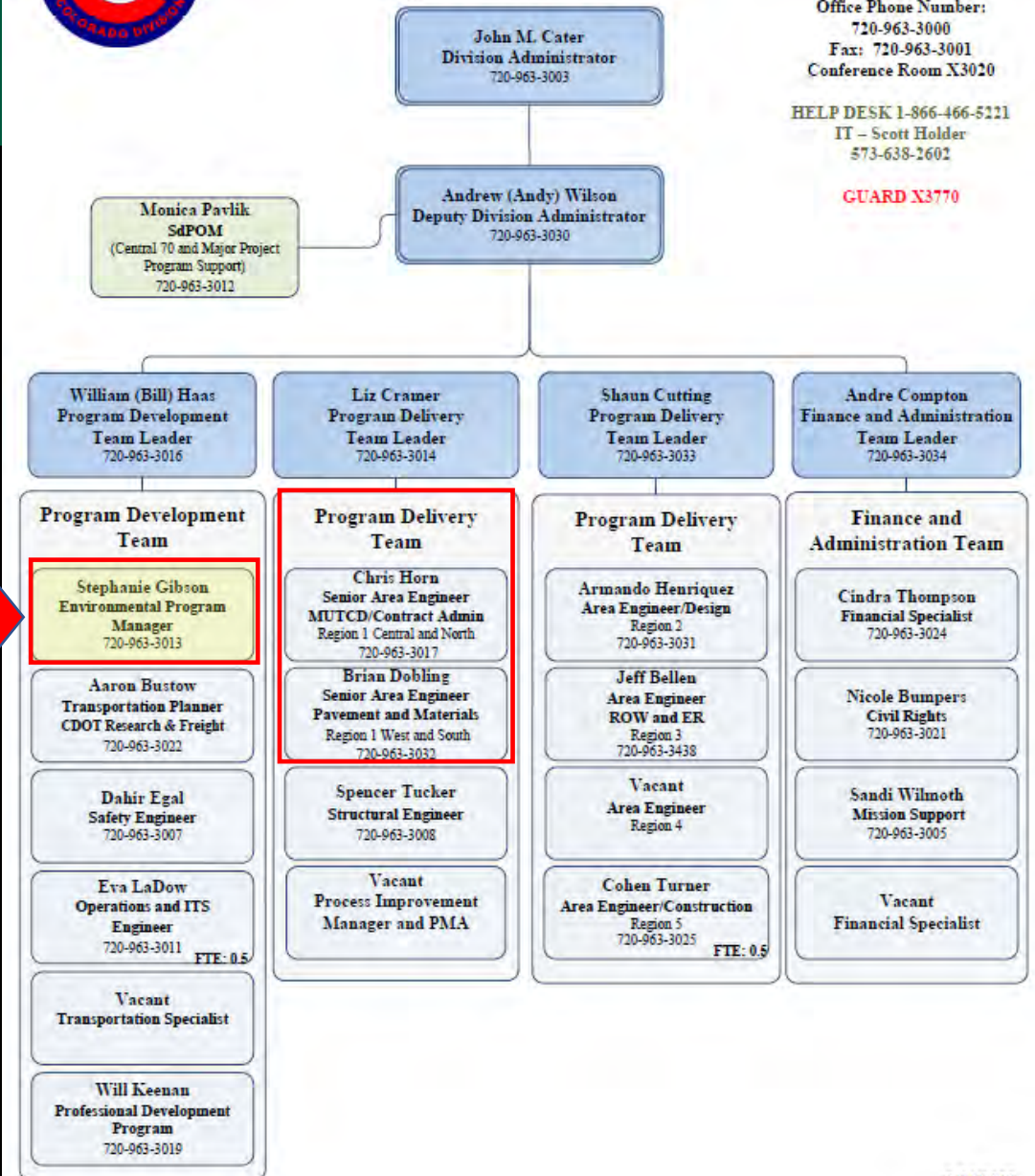


FHWA Colorado Division Organizational Chart

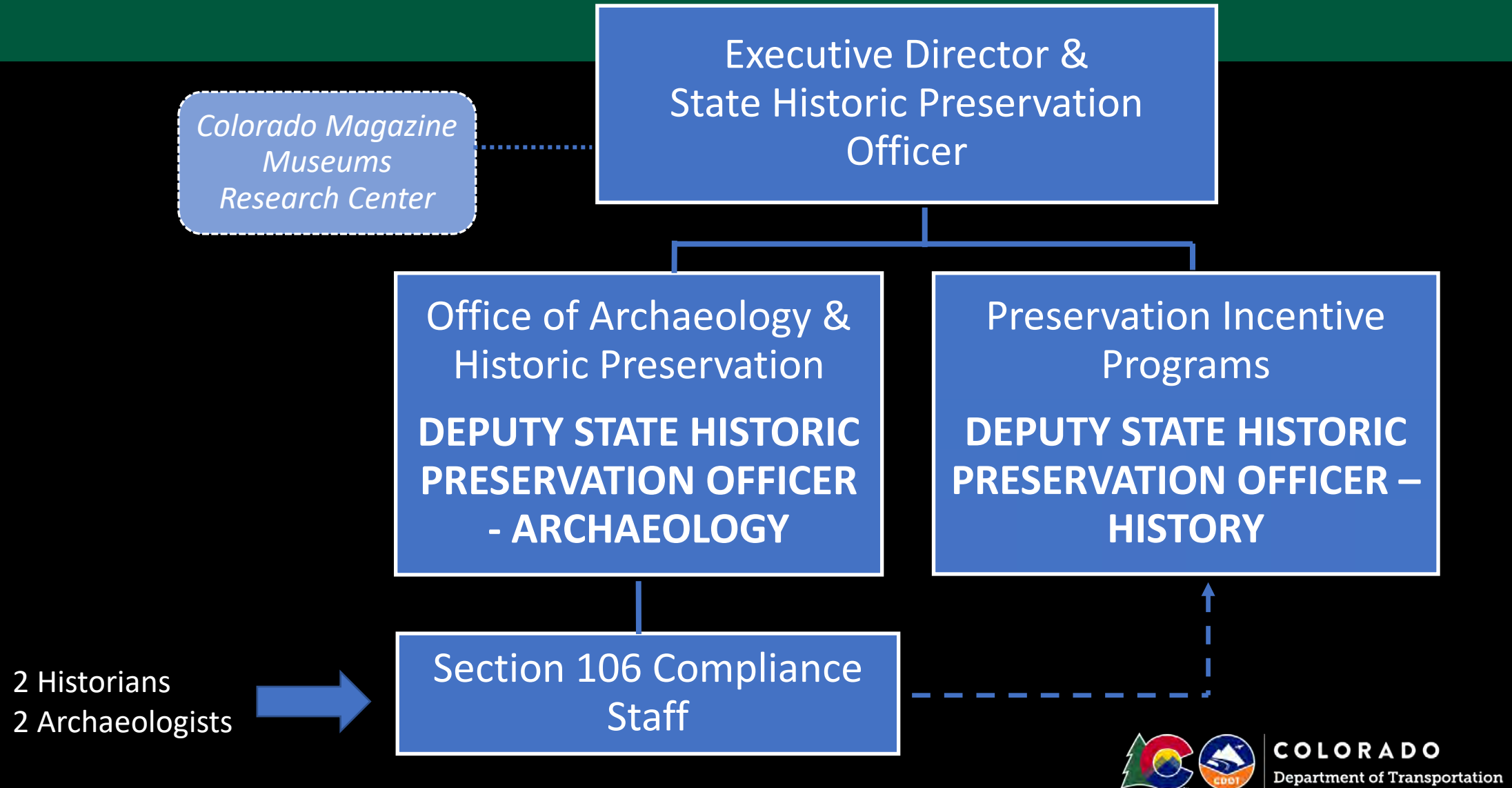
Office Phone Number:
720-963-3000
Fax: 720-963-3001
Conference Room X3020

HELP DESK 1-866-466-5221
IT – Scott Holder
573-638-2602

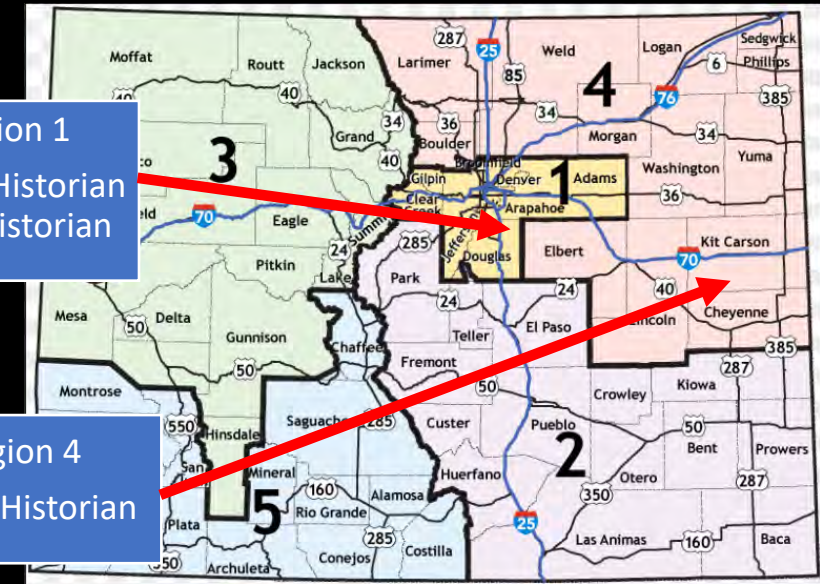
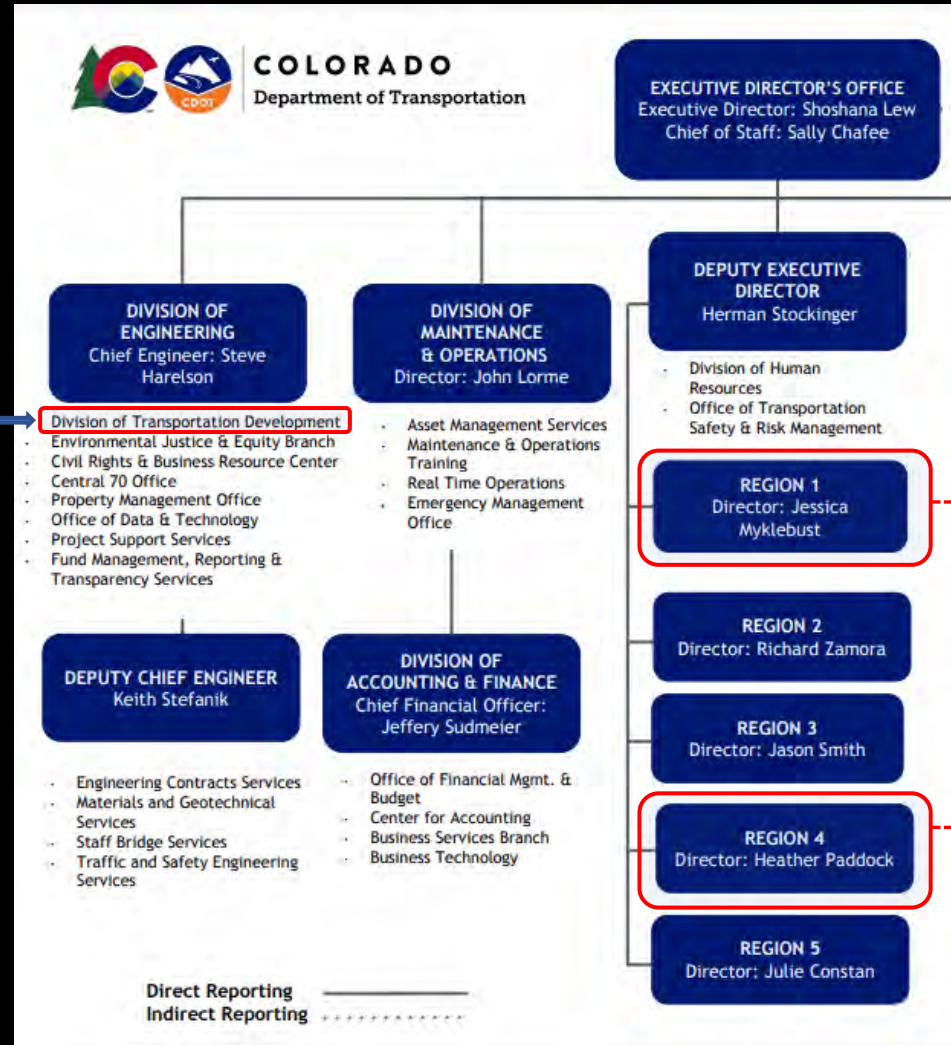
GUARD X3770



SHPO-Colorado



CDOT – Cultural Resources



General Section 106 Compliance – Programmatic Agreement (2014)

- CDOT is party to a PA along with FHWA and SHPO regarding Section 106:
 - *Exempted Undertakings* – project types that are not undertakings
 - *Screened Undertakings* – 8 project categories that can be “cleared” by CDOT historians
 - Identification and Evaluation – follow 36 CFR 800
 - Effects – follow 36 CFR 800
 - Phased approach for large projects



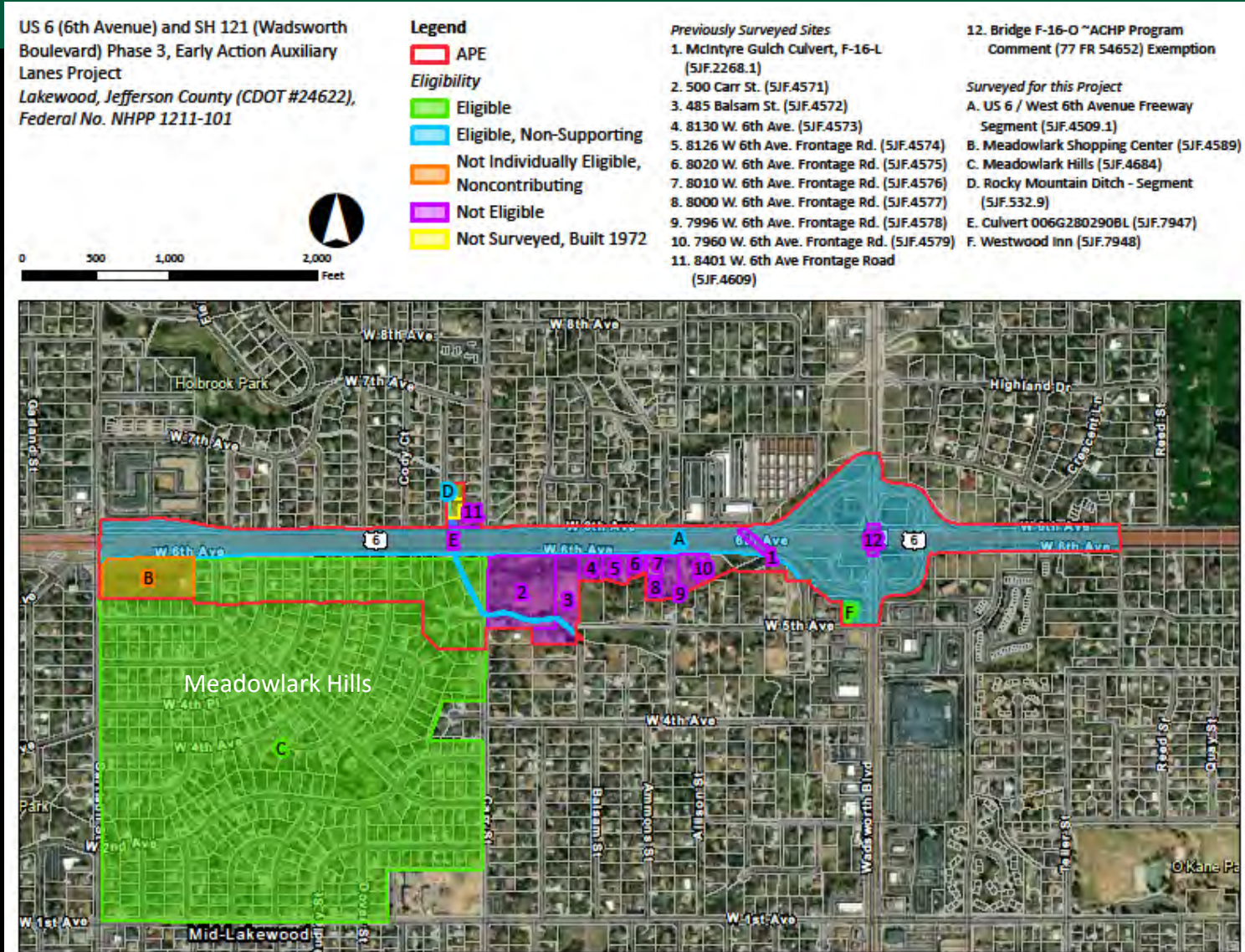
General Section 106 Compliance – CDOT Best Practices



- Typically survey 45 years +
- Historic Contexts
 - **Statewide** – Highways, Bridges, Railroads, Streetcars
 - **Regional:**
 - Historic Residential Subdivision Context for Metropolitan Denver, 1940-1965
 - West Colfax (US 40) Historic Resources, 1876-1975
 - Project Specific Contexts

General Section 106 Compliance – APE

- APE – direct and indirect effects
 - Noise analysis often basis for APE for large projects
 - Catex typically adjacent/affected properties
- Post World War II Subdivisions are “a resource”
- Tendency to survey entire subdivision if any part of subdivision is in APE



Typical Historic Property Survey Report – Large Projects

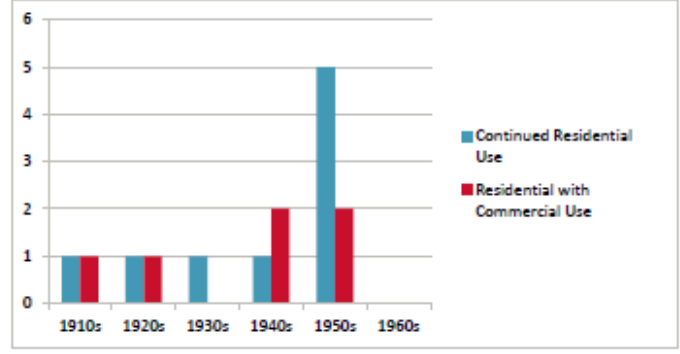


Historic Resources Technical Report

Wadsworth Boulevard Widening Project ENVIRONMENTAL ASSESSMENT



Figure 12. Residential properties by construction date.



Rendition showing additional traffic lane and new sidewalk next to eligible house



2.0 Historic Context

NOTE: This context is an expansion of the context included in the 2014 PEL report. It focuses on midcentury development in Wheat Ridge (1950–1970). The full context from the PEL report is included in Appendix C.

2.1 Early Growth of Wheat Ridge

Wheat Ridge, located just west of Denver, was characteristically agricultural in its early years. The 1862 Homestead Act enabled settlers to claim 160-acre tracts in the area, spurring the start of large-scale farms. Most of the available land in the area was claimed by 1870. The economy was largely supported by truck farming, which later converted many of the larger plots of land to smaller 10- to 40-acre lots. In addition to more standard orchards and farms, Wheat Ridge became known for its flower farms. In 1883, William Wallace Wilmore started cultivating flowers in the front yard of his parent's property. Two years later, he purchased a 10-acre lot on the northwest corner of the intersection of West 38th Avenue and Wadsworth Boulevard; this became the site of the W. W. Wilmore Nursery, one of the largest dahlia farms in the country. Wilmore's success inspired others to farm flowers in the area, and their greenhouses soon peppered the landscape among the existing farms and orchards.

By the 1920s, Denver's growth was beginning to spread west toward Wheat Ridge. During the 1920s, most of the land on the east side of Wheat Ridge was divided into acre-sized lots to prepare for residential development to accommodate the community's growing population, which grew from 2,300 to about 5,000 between 1920 and 1929. Developers pushed the idea of Wheat Ridge as the place "for people who want to buy their homes and live in the country but who cannot afford to invest in the usually high-priced country home property" (Olson 1994). All of Jefferson County experienced a major suburban boom during the late 1930s that continued into the 1960s, bringing further residential and retail development to Wheat Ridge.

2.2 Midcentury Development in Wheat Ridge

As early as the 1950s, proposals for annexing or incorporating the eastern Jefferson County communities of Wheat Ridge and Lakewood were common topics at local city council meetings. A midcentury growth plan developed for the metro area in the 1960s identified (at the time, unincorporated) Lakewood and Wheat Ridge as having been urbanized, with little remaining vacant land. The growth pattern was described as "scattered out and then gradually filled in between scattered subdivisions" (ICRP 1970; Existing Land Use section). Incorporation became a necessity after growth reached a point at which water and sewer services were insufficient for the number of housing units, and other services were haphazard. While Denver initially wanted to annex Lakewood and Wheat Ridge, both unincorporated communities rejected the plan throughout the early 1960s (Lomond 2009). Lakewood officials backed a proposal that would combine their community with Wheat Ridge and incorporate the two areas as the new city of Ridgeway, but the "longtime rivalry between small, sedate Wheat Ridge and big, bustling Lakewood" made the merger unpopular (Denver Post 1958). When the two communities agreed to annexation in 1969, the City of Denver rejected the offer, saying that the proposal violated city and state annexation laws and that Denver could not support services to the 100,000 people that would be added to its population (Denver Post 1969b).

I 403B Survey Form: Post World War II Subdivisions

- Efficient Survey Form for post WW II subdivisions with large number of similar resources.
- Identify models/types and list out addresses by type
- Small vs. large subdivisions
- Use Multiple Property Documentation Form - *Historic Residential Subdivisions of Metro Denver, 1940-1965*
- Additional Criteria A and B research
- Survey Report and Survey Forms to SHPO



COLORADO CULTURAL RESOURCE SURVEY

Form 1403b: Post-World War II
Residential Suburban Subdivision Form
(1945-1975)

Determined Eligible- NR Individual District
 Determined Not Eligible- NR
 Determined Eligible- SR Individual District
 Determined Not Eligible- SR
 Needs Data (specify):



This form should be used to record and assess the potential National Register Historic District eligibility of post-World War II residential subdivisions. Such subdivisions-- with large numbers of similar resources, limited architectural styles/ building types, relatively short periods of development, and design as major land use developments-- are far more likely to be eligible as historic districts rather than individually eligible resources. This form has been designed to facilitate the documentation of a preponderance of residential historic resources approaching and/or having achieved the 50 years of age benchmark. The primary period of development for these resources is usually 1945 to 1975.

Please review in conjunction with the National Register Bulletin *Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places*.

I. IDENTIFICATION


1. Resource number: 5JF.7062
2. Temporary resource number:
3. County: Jefferson
4. City: Wheat Ridge
5. Subdivision name: Clear Creek Vista






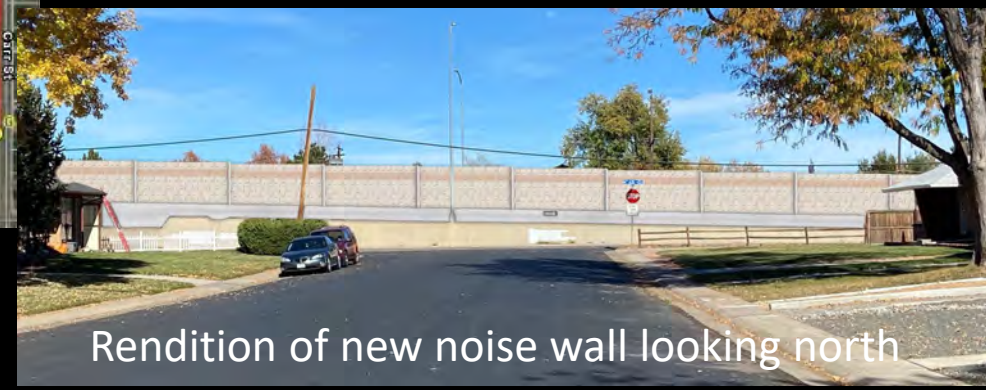
Model Name or Label	Architectural Style/ Building Type	Description (stories, roof shape, plan shape, primary materials, porch, auto storage, other)	Addresses within Surveyed Subdivision	Sample Photographs (address, date, file name)
Rectangular – Side Gable	Ranch	One story rectangular-shaped Ranch with side gable roof. Cladding is mixture of brick and siding often with decorative shutters. One- or two-car attached garage.	4625 Webster 4635 Vance 4640 Webster 4645 Webster 4655 Vance 4660 Webster 4665 Webster 4675 Vance 4685 Webster 7421 W 46 th 7481 W 46 th 7580 W 47 th	 7481 W 46 th Avenue, 4/25/17 (7481 W. 46 th Ave)
Rectangular – Hipped Roof	Ranch	One story rectangular-shaped Ranch with hipped roof. Cladding is mixture of brick and siding often with decorative shutters. One- or two-car attached garage.	4615 Webster 4625 Vance 4630 Webster 4635 Webster 4645 Vance 4650 Webster 4655 Webster 4665 Vance 4670 Webster 4675 Webster 4685 Webster 7520 W 47 th	 4625 Vance Street, 4/25/17 (4625 Vance)



I403B Survey Form: Post World War II Subdivisions

Resource No. and UTM Reference	Eligibility Criteria	Resource Address	Date of Construction	Model Type	Alterations & Integrity	Contributing/Noncontributing (C/NC)	Photograph
5JF.4684 (5JF.4594) 13N, 491813 mE, 4397182 mN	Criteria A & C	555 Estes St	1954	Ranch	Minor addition to side elevation visible from front; extended front stoop; windows replaced; front door replaced good integrity	C	 IMG_0146; 4/14/2022

Model Name or Label	Architectural Style/ Building Type	Description	Addresses within Surveyed Subdivision	Sample Photographs
Type B	Split-level/Tri-level	<ul style="list-style-type: none"> 1,500 – 2,300 sq ft Interior with staggered levels of living space Combination of one- and two-story massing Roof type - See variations Broad Chimney Fixed picture windows Brick cladding Small front stoop <p>Variations</p> <ul style="list-style-type: none"> Low-pitched side-gable/cross-gable or hipped/cross-hipped roof with broad overhanging eaves Front-facing gable extensions Wood or wood-like siding on the gable end Attached or integrated single-car garage Sliding or casement picture window Wrap around windows Glass-block windows Polychromatic brick, belt course Decorative cladding - Roman brick or permastone Decorative Elements (Shutters, iron brackets, iron railing, planter box, brick planter supports) 	<ul style="list-style-type: none"> 9100 West 4th Avenue 8520 West 2nd Avenue 8510 West 2nd Avenue 8500 West 3rd Place 9025 West 5th Place 8520 West 6th Avenue/Frontage Road 590 Dover Street 155 Dudley Street 420 Cody Drive 8515 Meadowlark Drive 165 Dudley Street 	 <p>9100 West 4th Avenue – Typical Type B: Hipped roof, brick clad split-level/tri-level house</p>  <p>8510 West 2nd Avenue – Variations on Type B: Side-gabled, brick clad split-level/tri-level house with a chimney, decorative cladding, and iron railing near the entrance</p>  <p>9025 West 5th Place – Variations on Type B: Hipped-roof, brick clad split-level/tri-level house with wrap around windows, a chimney, decorative cladding, and iron railing near entrance</p>



Historic Residential Subdivision Context for Metropolitan Denver, 1940-1965



We wouldn't dream
of buying a new home until
we see what CAREY builds!*

* Unfortunately, we weren't *really* here to build homes for the Gold Seekers of 1859. Since 1949, though, we've built over 4,000 homes in Denver for those modern families who've joined the latest "Rush to the Rockies."

Carey Construction Co.

CAREY GARNATION HOMES Aurora
 CAREY BONUS HOMES Sheridan Hills
 CAREY HOLIDAY HOMES Harvey Park
 CAREY EXECUTIVE HOMES Harvey Park
 CAREY FAMILY HOMES Harvey Park
 UNIVERSITY HILLS (Co-Developers)

NPS Form 10-900-b
(Revised March 1982) OMB No. 1024-0018

United States Department of the Interior
National Park Service **2010**

**National Register of Historic Places
Multiple Property Documentation Form**

This form is used for documenting multiple property groups relating to one or several historic contexts. See instructions in *How to Complete the Multiple Property Documentation Form* (National Register Bulletin 16B). Complete each item by entering the requested information. For additional space, use continuation sheets (Form 10-900-a). Use a typewriter, word processor, or computer, to complete all items.

New Submission Amended Submission

A. Name of Multiple Property Listing

Historic Residential Subdivisions of Metropolitan Denver, 1940-1965

B. Associated Historic Contexts

(Name each associated historic context, identifying theme, geographical area, and chronological period for each.)

Metropolitan Denver Suburban Residential Development, 1940-1965

C. Form Prepared by

name/title Thomas H. Simmons and R. Laurie Simmons, historians date 22 October 2010 (revised)
 organization Front Range Research Associates, Inc.
 street & number 3635 West 46th Avenue (www.frrhistory.com) telephone 303-477-7597
 city or town Denver state Colorado zip code 80211 and
 name/title Dawn Bunyak, historian
 organization Bunyak Research Associates
 street & number 10628 W. Roxbury Avenue (www.bunyakresearch.com) telephone 303-932-7725
 city or town Littleton state Colorado zip code 80127

D. Certification

As the designated authority under the National Historic Preservation Act of 1966, I hereby certify that this documentation form meets the National Register documentation standards and sets forth requirements for listing of related properties consistent with the National Register criteria. This submission meets the procedural and professional requirements set forth in 36 CFR Part 60 and the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.
(See continuation sheet for additional comments [].)

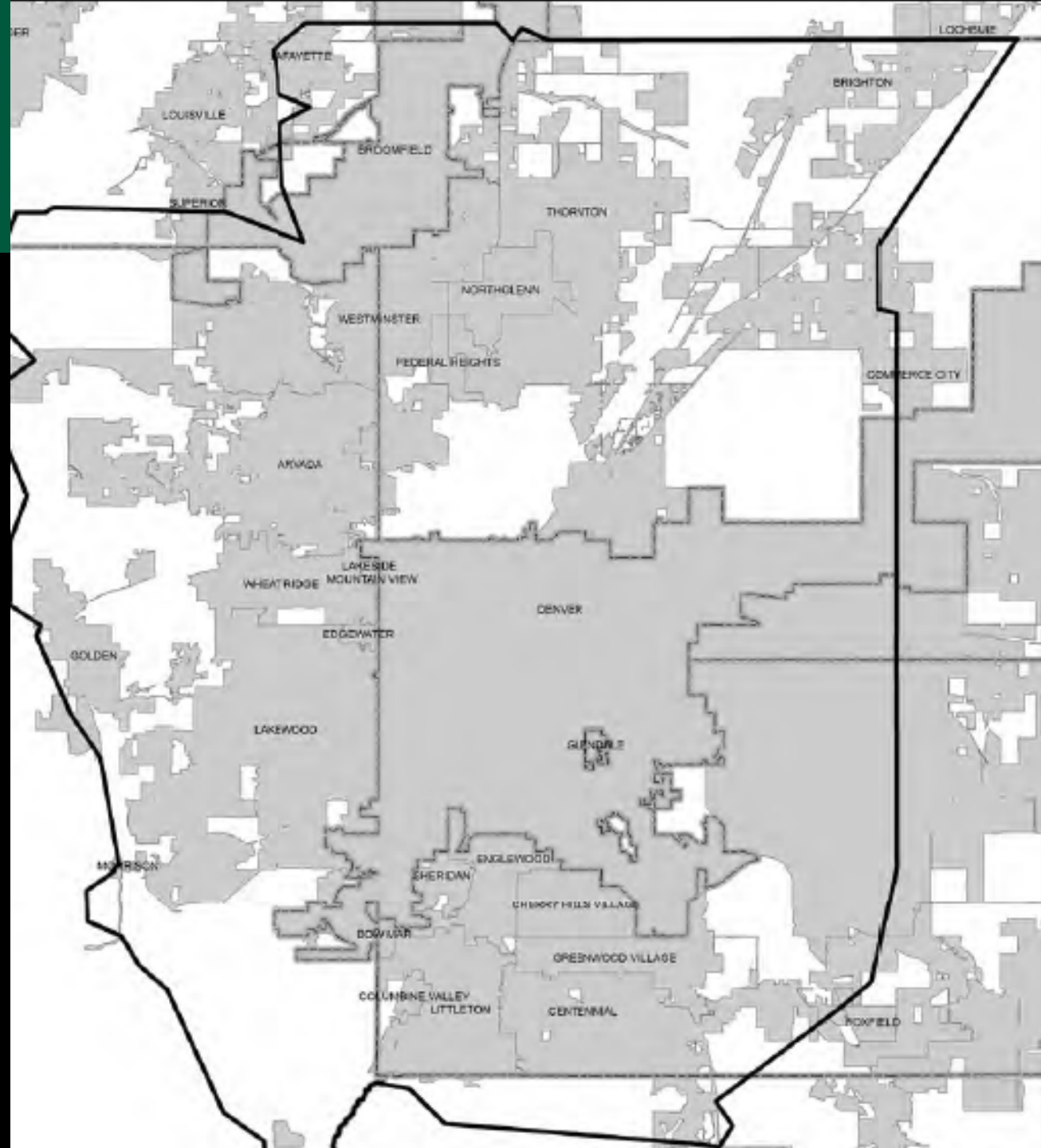
Deputy State Historic Preservation Officer _____
 Signature and title of certifying official Date _____
 State Historic Preservation Office, Colorado Historical Society
 State or Federal agency and bureau _____

I hereby certify that this multiple property documentation form has been approved by the National Register as a basis for evaluating related properties for listing in the National Register.

Signature of the Keeper _____ Date of Action _____

Historic Residential Subdivision Context for Metropolitan Denver, 1940-1965

- Architects and Landscape Architects
- Builders and Developers
- Subdivision Layout/Property Type:
 - Existing Subdivision
 - Domestic Subdivision
 - Multiple Filing Subdivision
 - Planned Suburban Community
 - Specialty
- Patterns by Community/Suburb and prominent subdivisions in each





Clara Belle (1952). The Grand View Builders partnership platted the Clara Belle Subdivision in 1952. Members of the partnership included Chester L. Hoskinson; Hoskinson family members James W. Hoskinson, Leonard V. "Bus" Hoskinson, Joy Hoskinson; Herman C. Combs, and Jesse Oldham. The subdivision became one of several small developments between Grandview Avenue on the north and Ridge Drive to the south built in the 1950s. Clara Belle extended from Carr Street on the east to slightly beyond Dudley Court on the west and featured curving streets and a cul-de-sac. Lots varied in shape and size with most at least 60' x 110'. Figure K31 is representative of the Ranch type found in the Clara Belle subdivision.

CHESTER L. "CHET" HOSKINSON

Chet Hoskinson (1905-1996) was born in Kansas, and after his graduation from high school the Hoskinson family moved to Colorado Springs. There he worked for the F.W. Woolworth Company, eventually managing stores in Nebraska and Colorado. During World War II, he worked at Lowry Field, the Denver Ordnance Plant, and Buckley Field. After the war, he purchased lots and built individual homes after founding the Hoskinson Development Company. Believing the "time was ripe for him to build on a larger scale," Hoskinson became one of the first contractors in the Arvada area to secure FHA financing for postwar residential construction. The *Arvada Enterprise* reported Chet Hoskinson built 425 new houses on the west side of Arvada between 1946 and 1952. Veterans returning from the war quickly purchased the dwellings and, as one newspaper article indicated, "People who bought these homes were ready to settle down and raise their families. They will tell you

County	Municipality	Subdivision	Number of Dwellings				Percent of Dwellings		
			Pre-1940	1940-65	Post-1965	Total	Pre-1940	1940-65	Post-1965
JEFFERSON	N/A	N/A	6,779	43,546	96,201	146,526	4.6%	29.7%	65.7%
Jefferson	Arvada	N/A	782	10,176	21,841	32,799	2.4%	31.0%	66.6%
Jefferson	Arvada	Allendale 4th Flg	0	158	1	159	0.0%	99.4%	0.6%
Jefferson	Arvada	Allendale 5th Flg	0	258	17	275	0.0%	93.8%	6.2%
Jefferson	Arvada	Allendale 6th Flg	0	117	0	117	0.0%	100.0%	0.0%
Jefferson	Arvada	Allendale 7th Flg	0	157	10	167	0.0%	94.0%	6.0%
Jefferson	Arvada	Allendale 9th Flg	0	117	2	119	0.0%	98.3%	1.7%
Jefferson	Arvada	Alta Vista Add	0	343	0	343	0.0%	100.0%	0.0%
Jefferson	Arvada	Alta Vista Sub	0	280	0	280	0.0%	100.0%	0.0%
Jefferson	Arvada	Arvada West Flg # 1 Amd & Blk 1 Arvada Square	0	153	0	153	0.0%	100.0%	0.0%
Jefferson	Arvada	Arvada West Flg # 4	0	208	0	208	0.0%	100.0%	0.0%
Jefferson	Arvada	Arvada West Flg # 5	0	140	0	140	0.0%	100.0%	0.0%
Jefferson	Arvada	Arvada West Flg # 6	0	134	0	134	0.0%	100.0%	0.0%
Jefferson	Arvada	Arvada West Flg # 7	0	123	0	123	0.0%	100.0%	0.0%
Jefferson	Arvada	Arvada West Flg # 8	0	142	2	144	0.0%	98.6%	1.4%
Jefferson	Arvada	Clara Belle	0	110	0	110	0.0%	100.0%	0.0%
Jefferson	Arvada	Combs Add	0	101	1	102	0.0%	99.0%	1.0%
Jefferson	Arvada	Far Horizons Flg #1	0	340	69	409	0.0%	83.1%	16.9%
Jefferson	Arvada	Highland Homes	0	121	4	125	0.0%	96.8%	3.2%
Jefferson	Arvada	King Krest Amd Plat	0	121	3	124	0.0%	97.6%	2.4%
Jefferson	Arvada	Koldeway	0	126	1	127	0.0%	99.2%	0.8%
Jefferson	Arvada	Lamar Heights Flg # 3	0	145	0	145	0.0%	100.0%	0.0%
Jefferson	Arvada	Lamar Heights Flg # 4	0	266	2	268	0.0%	99.3%	0.7%
Jefferson	Arvada	Lamar Heights Flg # 7	0	129	33	162	0.0%	79.6%	20.4%
Jefferson	Arvada	Lyndale	1	146	1	148	0.7%	98.6%	0.7%
Jefferson	Arvada	Sandra Teri	0	113	0	113	0.0%	100.0%	0.0%
Jefferson	Arvada	Vetting	1	140	0	141	0.7%	99.3%	0.0%
Jefferson	Bow Mar	N/A	1	67	45	113	0.9%	59.3%	39.8%
Jefferson	Edgewater	N/A	920	1,474	143	2,537	36.3%	58.1%	5.6%
Jefferson	Edgewater	Rose Acres	0	176	0	176	0.0%	100.0%	0.0%
Jefferson	Golden	N/A	747	1,809	2,891	5,447	13.7%	33.2%	53.1%
Jefferson	Golden	Bunzel Add to Golden	0	104	0	104	0.0%	100.0%	0.0%
Jefferson	Golden	Wabbe Add to Golden	104	500	0	604	17.2%	79.7%	3.1%

Post World War II Resources Recap

- Post World War II Residential Subdivisions - No Major Eligibility Issues if within Denver MPDF area
- Post World War II Residences – More Issues if Outside of Denver MPDF Area
 - No Statewide Context for Post World War II Residences or Residential Subdivisions
 - Lack of regional historic contexts and surveys that include post WW II era
 - Rely more on project-specific contexts and individual survey forms



Post World War II Resources – Other Issues

- Highways/Roads - US 6

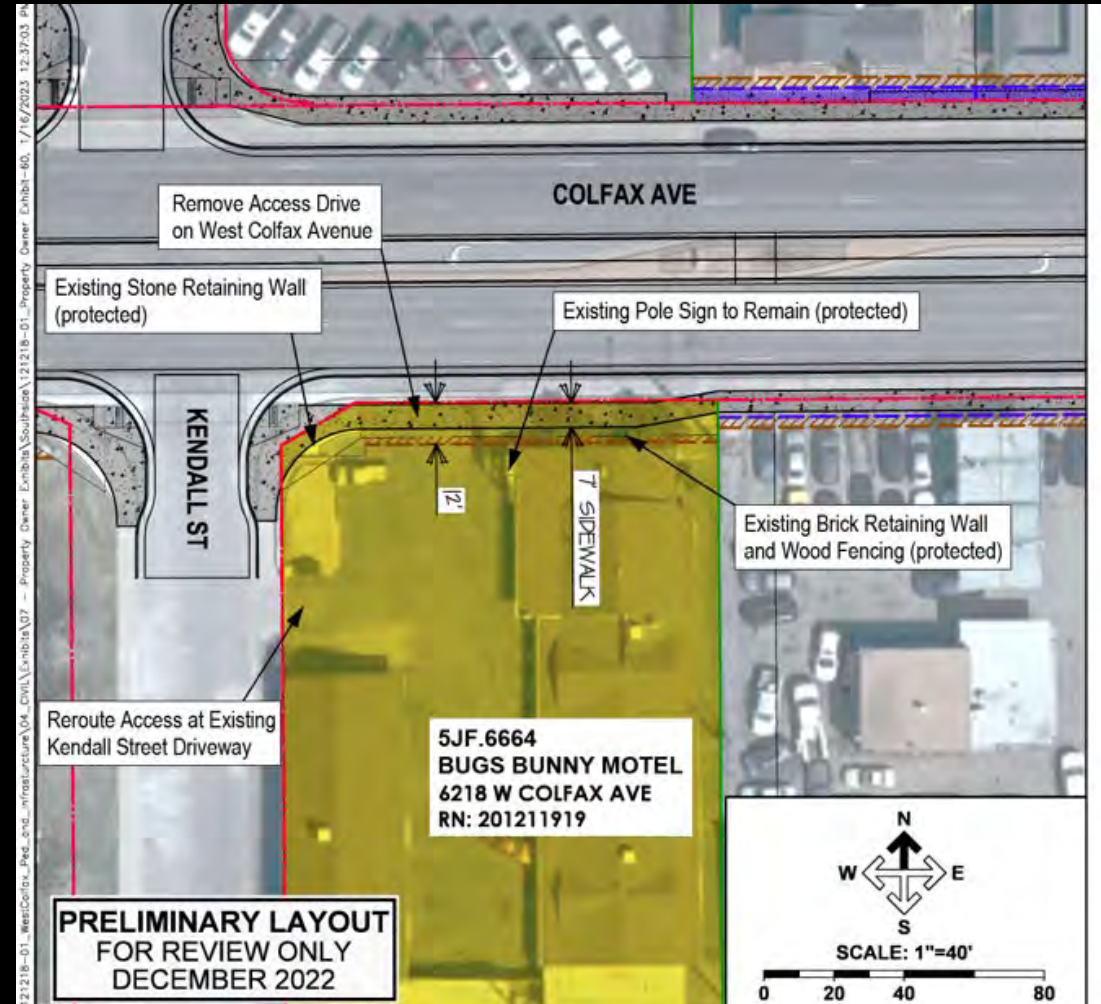


- Tunnels – EJMT



Post World War II Resources – Other Issues

- Commercial Roadside Properties





QUESTIONS/
COMMENTS?

MDOT SHA Peer Exchange Presentation

Presenter:
Matt Manning



Post-WWII Peer Exchange

MDOT SHA MARYLAND

April 13, 2023

organization

shpo

Operations

Planning,
Education,
Outreach

Research, Survey,
Registration

Archaeology

Arch. History

Richard
Ervin
OP3

Matt
Manning
OP3, D5, D6

Lisa
Kraus
D3, D6, D7

Rebecca
Crew
D1, D2

Kasey
Miller
D4

Sarah
Goesbeck
D3, D4, D7
MDTA

Kari
Sprengeler
D1
Local Gov't

Vacant

Kris
Beadenkopf
MTA, D2, D5





section 106

Programmatic Agreement

Delegation

FHWA delegates MDOT SHA the responsibility to establish the undertaking and initiate 106 review and consultation

Minimal Potential


Projects with minimal potential to cause effects are exempt from further review

Minor Projects

For minor project types, no SHPO coordination required if historic properties are not affected

Other Projects

Otherwise, MDOT SHA initiates coordination with SHPO and notifies FHWA of any adverse effects



survey methodology

Maryland Inventory of Historic Properties (MIHP)
& Determination of Eligibility (DOE) Forms

MIHP

- Not all eligible “historic properties”
- List of all architectural resources surveyed in the state
- Some have been evaluated, others have not
- MIHP form records a resource to the inventory but does not determine eligibility

DOE

- Determines NRHP eligibility
 - Regular and short forms
 - Short Form for Ineligible Properties is used when a resource clearly lacks eligibility due to integrity or commonality. Not used for districts.
-



suburbanization historic context

1815-1960 in Maryland

Original context developed by MDOT SHA
c.2000 with an emphasis on DC area

Identified multiple eras of suburbanization with
1930-1960, the Modern Era, the most recent

Established suburban community types (districts)
as units for survey based on development patterns

2018: new plan to widen I-495 around Washington,
DC, in Maryland and I-270 to Frederick

MDOT SHA created an addendum to cover
suburban development within the anticipated survey
period

suburbanization historic context

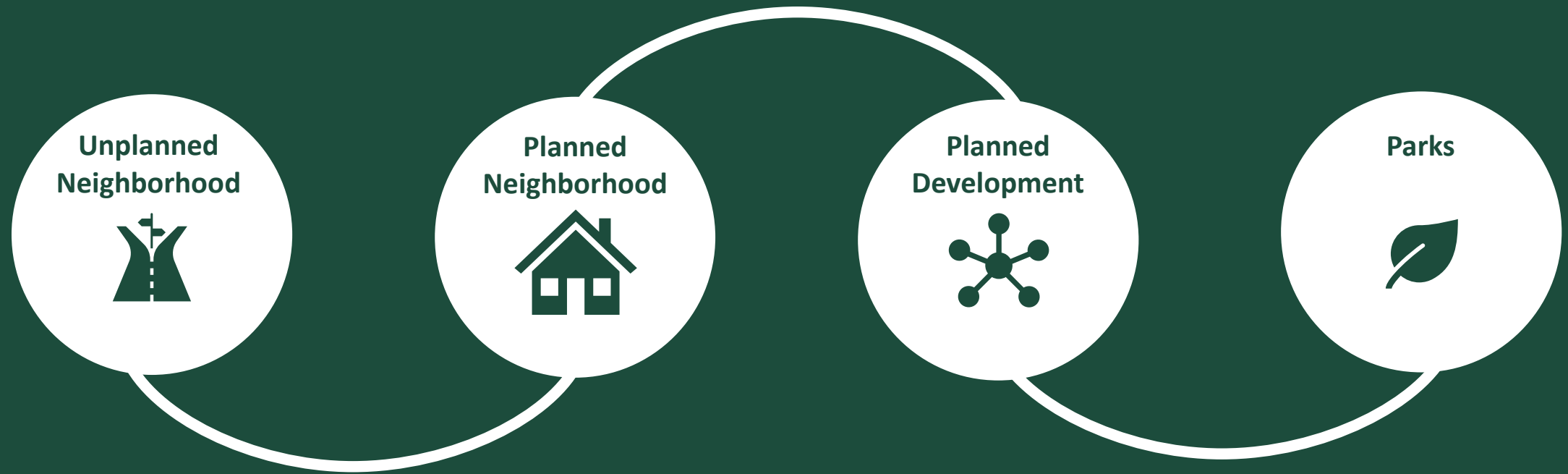
Addendum 1960-1980

Suburban Diversification Period



suburbanization historic context

Addendum 1960-1980: Suburban Diversification Period
Suburban Development Systems



suburbanization historic context

Addendum 1960-1980
Trends & Significance

**Expanded
Transportation
Networks**

**Changing
Demographics**

**Expansion of
Federal
Government**

**Environmental
Movement**

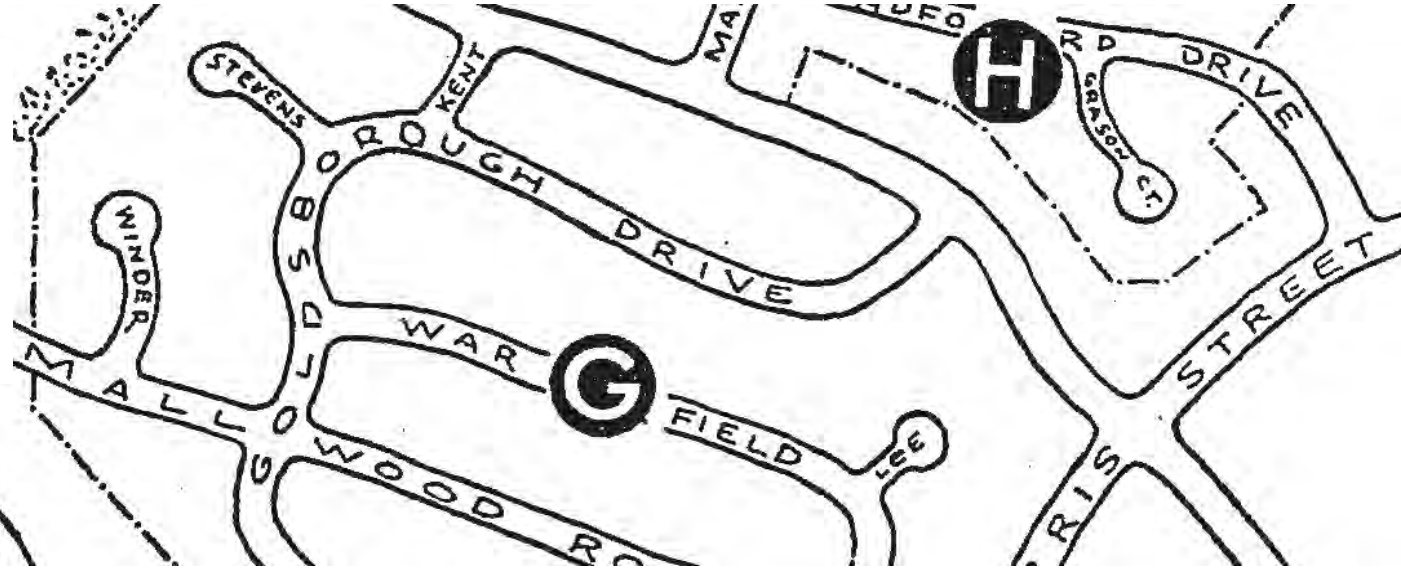
**Local and
Regional
Planning**

Context established a high bar for eligibility

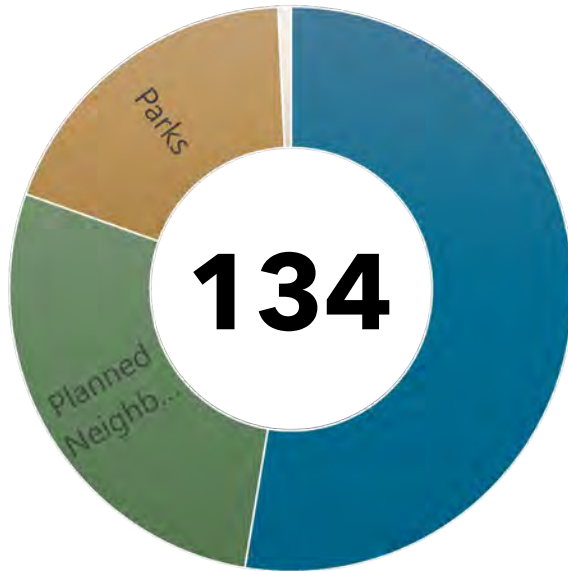
- Many similar resources still intact
- Significance under Criterion C as a type, period or method of construction is rare
- Should be first of a type or last remaining and demonstrate a high degree of integrity

Maryland developments have been most frequently eligible under Criterion A or A & C

architectural survey results

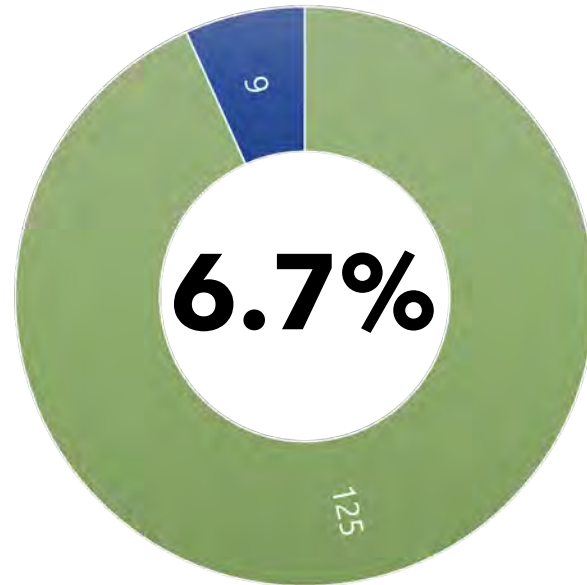


Surveyed Developments



■ Unplanned Neighborhoods ■ Planned Neighborhoods
■ Planned Developments ■ Parks

NRHP Eligibility



■ Not Eligible ■ Eligible

Keys to Success

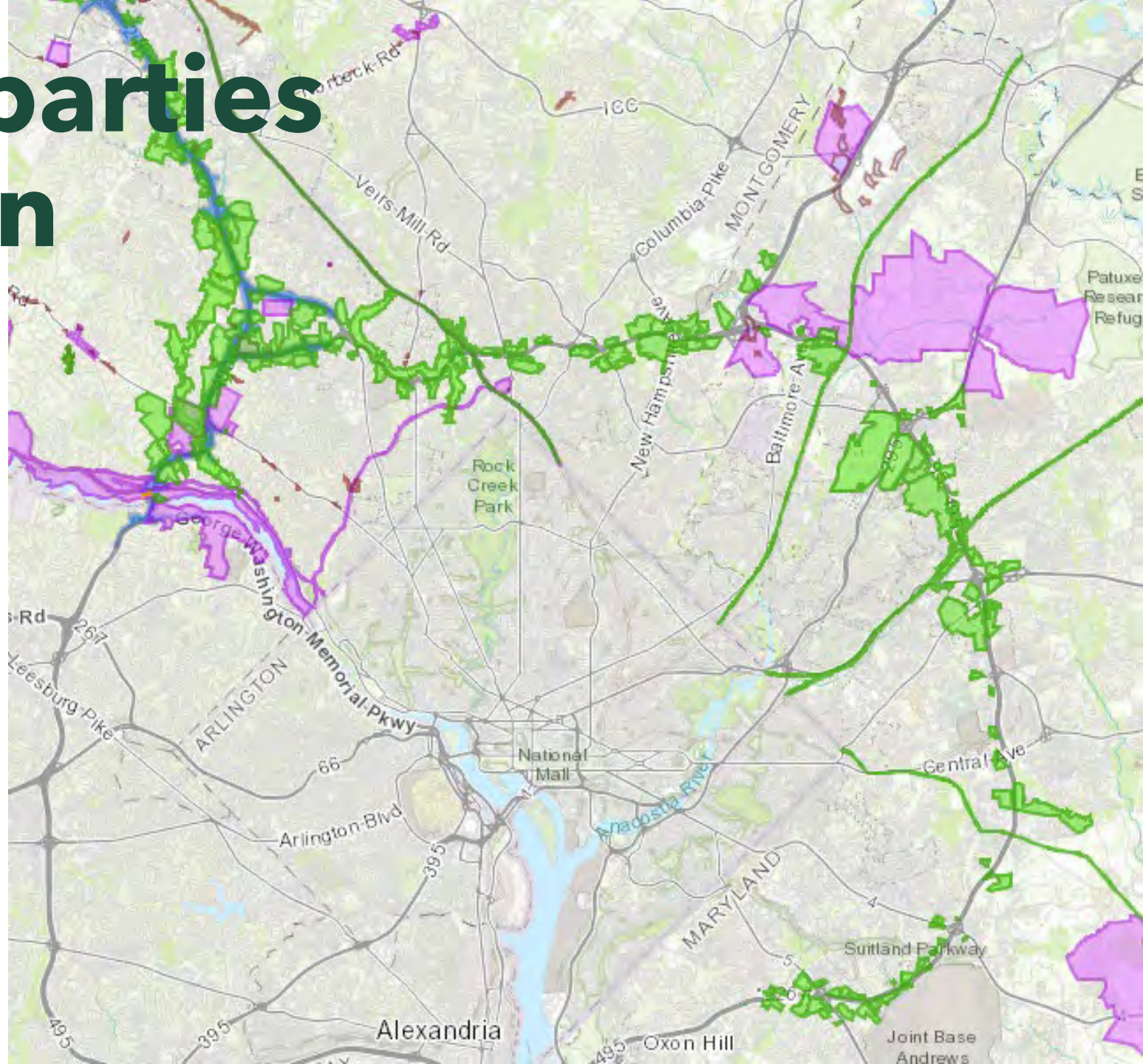
- Single dispute with SHPO regarding eligibility
- MDOT SHA directed development of context with SHPO buy-in
- Kept SHPO informed throughout
- Existing 20-year precedent for post-WWII evaluations

consulting parties coordination

ArcGIS Online

Interactive Online Map

- Updated as DOEs submitted to SHPO
- Shows boundaries and links to digital DOEs
- Customizable layers and filters
- At conclusion of survey, adapted map to show eligibility and all historic properties within APE



discussion topics

Identification, Evaluation, &
Other Challenges

Minority Communities: identification

Representative Examples: avoiding the
eligibility trap

Applicability: suburban development outside
of DC and future county or statewide contexts



discussion topics

SHPO, Consulting Parties, & Consultants

Eligibility: subjective nature - clarity and sound logic are key; most disagreements have resulted from inadequate DOEs

Effects: SHPO remarks can lead to effect determination difficulties

Consultants: writing DOEs with effects in mind

- Roadside features, character-defining elements, integrity
- Time invested in training and high turnover

Outreach:

- Convincing consulting parties to work with us versus against us



contact info

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mmanning@mdot.maryland.gov

Steve Archer
410-545-8508
sarcher@mdot.maryland.gov

Links

- Cultural Resources Website:
 - <https://roads.maryland.gov/mdotsha/pages/Index.aspx?PageId=729>
- I-495 & I-270 Managed Lanes Study Map
 - <https://maryland.maps.arcgis.com/apps/webappviewer/index.html?id=b6f8fad8b44543f691c91186291c5aa3>

