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IDAHO TRANSPORTATION DEPARTMENT

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December 5, 2019

Ashley Brown
Historic Preservation Review Officer
State Historic Preservation Office
210 Main Street
Boise, ID 83702

**RE: Project No. A019(134); Key No. 19134
100 South Road, Jerome County (2019 Re-Evaluation) – Project Effect Update Memo**

Dear Ashley,

The Idaho Transportation Department is proposing roadway improvements on United States Highway 93 (US-93) from milepost (M.P.) 57.231 (south of the intersection of US-93 and 100 South Road) to milepost 59.486 (north of the junction with State Highway 25) in Jerome County. This segment of US-93 is currently a two-lane highway with turning lanes at the intersection with SH-25; however, south of the current segment, two additional lanes (for a total of four lanes) have been previously added as part of this overall project. US-93 is a main north-south arterial roadway connecting Nevada to Montana. (Previously the Sawtooth Park Highway connected the resort community of Ketchum/Sun Valley, now located on SH-75, with the east-west crossroads.) The proposed project will include construction of a new two lane roadway to the west of the existing two lane roadway creating four through lanes (each lane at 12 feet wide) with a center non-traversable divided median. The center median can range between 12 to 16 feet to manage side-friction safety and to facilitate snow removal. The inside shoulder width shall be a minimum of four feet and outside shoulder shall be a minimum of eight feet. Roadway tapers conclude within the identified project limits.

The existing intersections with public roads (100 South Road and State Highway 25) will have full improvements with turn movements allowed in all directions. Frontage roads are designed and will be constructed as needed to access property.

The Area of Potential Effect (APE) was defined by the proposed project actions and encompasses 200 feet on the east side of US-93 and between 200 feet and 400 feet on the west side of US-93, between M.P. 57.231 and M.P. 59.486. The Bureau of Land Management (BLM) portion of the APE is situated on the west side of US-93 between 100 South Road and State Highway 25.

A cultural resources investigation was completed and resulted in the identification of two previously recorded sites (53-17072: US Highway 93) and (10JE546: Historic Scatter) and five historic sites that had not been previously recorded (Temp No. JR-01 through JR-05). Of the seven sites identified, five (JR-01 through JR-04 and 10JE546) are not eligible for the National Register of Historic Places (NRHP) and two (JR-05: State Highway 25 and 53-17072: US Highway 93) are eligible for the NRHP.

The determination of that investigation (Nickoloff 2018) concluded that a total of 2.255 miles of US-93 (originally known as the Sawtooth Park Highway) was within the current project area and consisted of two segments. The 7.5 mile segment between E. 700 N. Road and SH-25 was constructed in 1934. It was realigned to the east in 1985 with 0.75 miles in the current APE (M.P. 58.729 to M.P. 59.486) and was therefore considered a non-contributing segment to the overall NRHP-eligible site. The segment between SH-25 and the Perrine Bridge was constructed in 1952 to bypass the town of Jerome, Idaho, with 1.455 miles in the current APE (M.P. 57.231 to M.P. 58.729) and at that time was considered a contributing segment to the overall NRHP-eligible road.

In the Section 106 investigation, ITD and the FHWA determined that project actions resulted in a No Adverse Effect determination. On June 3, 2019, your office stated concerns regarding the No Adverse Effect finding and requested a detailed integrity analysis of this segment to assist in the project effect assessment. ITD provided additional information which supported a No Adverse Effect determination in a memo dated June 14, 2019. On July 5, 2019, your office disagreed with the findings as presented in the memo, stating that overall project actions would have an Adverse Effect to Historic Properties.

Subsequently, ITD completed a more thorough review of the resource, prompting additional eligibility discussions and evaluations. A more thoughtful analysis of this 1.5 mile long segment (between M.P. 57.231 and M.P. 58.729) indicates that an incorrect contributing segment assessment was previously made (Nickoloff 2018). US-93 has been recorded numerous times, and has been determined eligible for the NRHP under Criterion A for its association with the development of Idaho state highways in the early twentieth century, and its important connection of small towns in rural Idaho. The period of significance for US-93 ranges between 1913 (beginning of construction for the Sawtooth Park Highway) and 1934 (when a segment of the "main route" of US-93 was constructed and designated near Jerome, Idaho).

The segment located within this project's APE is a bypass route constructed in 1952 and was the third re-route of the highway in the Jerome area between 1934 and 1952. Therefore, this segment is outside of the period of significance – defined as the point or span of time (marked by a year beginning and a year ending) during which the resource was associated with a significant event, person, group, land use, or during which it attained the physical characteristics that make it significant.

In addition to this segment of US-93 being constructed outside of the period of significance, its purpose is also not associated with the historic significance of US-93. The historic context and significance of US-93 was related to its purpose of connecting small towns in rural Idaho (Criterion A). The opposite can be said for a bypass route, which serves to assist vehicular traffic in avoiding "built-up" or developed areas.

The information collected by Bionomics Environmental in 2018 for the IHSI site form (53-17072) discusses the construction of the bypass; however, it wasn't until 2019 that Bionomics Environmental examined this information in more detail and determined that it was relevant to the current discussion. See the following information gleaned from the 2018 IHSI Site Form:

In 1913, the State Legislature created a five-member State Highway Commission, quickly appointing members and immediately considering proposals for highways in the state (ITD 1985). This 1913 date is often used as the date of the first Highway Commission as this Commission was fully organized with supporting mechanisms for funding, authorization and administration over the construction of new roads. The Commission had policies that addressed the construction and quality of the roads, such as grade and location, and also included policies on management and maintenance. The Commission thoughtfully devised a system of road routes connecting major populations, centers of business and primary travel routes through Idaho and connecting to neighboring states.

Six routes were developed, with Route No. 6 being the Sawtooth Park Highway (now known as US-93), a 100 mile route connecting with a junction with the then Idaho-Pacific Highway at Twin Falls and running through Jerome, Shoshone, Richfield, Bellevue and Hailey (ITD 1985). The Commission implemented quickly and its first construction contract was awarded by the end of the year (ITD 1985). Survey work for roads with new routes began the following year in 1914 (ITD 1985). In 1915-16, the Commission extended the plans for the route of the Sawtooth Park Highway from Hailey over Galena Summit and through Stanley Basin to a junction with the Idaho-Montana Highway near Challis (ITD 1985).

In 1926, the U.S. established a nationwide highway numbering system and all roads were renamed including the Sawtooth Park Highway (now labeled as US-93 on maps and signage) which was still undergoing construction (ITD 1985; Angie Davis verbal communication 2016). Also by 1926 US-93 "originated at the United States- Canada International Boundary near Eureka, Montana (Port of Roosevelt) and ran south to Wells, Nevada. The route through Idaho ran from the Montana-Idaho border line near Gibbonsville to the Idaho-Nevada line south of Rogerson, Idaho" (Valentine and Clementz 2011).

According to ITD Minute Book 6 (1932-1934), Utah Construction Co. constructed the segment of the Sawtooth Park Highway (US-93) between the Jerome Airport (SH-25) and "Newman's Corner" (now known as E. 700 N. Road) in 1934 at the cost of \$42,565.00. According to ITD Minute Book 9 (1936-1937), the Sawtooth Park Highway (US-93) "carrying route" between the "Rim-to-Rim Bridge" (Perrine Bridge) and "Newman's Corner" (known today as the corner of US-93 and E. 700 N. Road) through Jerome, was re-designated on March 1, 1937 as the "Jerome Branch of the Sawtooth Park Highway". At this time, a second "main route" of the Sawtooth Park Highway was designated as heading north from the "Rim-to-Rim Bridge" to "Newman's Corner" via Barrymore. The route traveled north through Barrymore and then east, tying into SH-25 before connecting back with the US-93 alignment at the SH-25 and US-93 intersection. The alignment then continued north towards Newman's Corner and farther north to Shoshone.

In the 1950s, the segment from the Perrine Bridge to the intersection of SH-25 was constructed, completely bypassing Jerome. During the same time period, the "Jerome Branch" was removed from the US-93 system and became known as SH-79. In 1985 the route was renamed "Golf Course Road" (Demo 2009).

To Summarize:

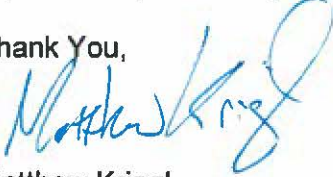
- The eight mile segment between the Perrine Bridge and SH-25 was constructed in 1952 (of which 1.5 miles is within the current APE). This segment is outside of the period of significance – defined as the point or span of time (marked by a year beginning and a year ending) during which the resource was associated with a significant event, person, group, land use, or during which it attained the physical characteristics that make it significant. The segment does not represent the primary time period of the Sawtooth Park Highway. In addition, the bypass is no longer related to its purpose of connecting small towns in rural Idaho (Criterion A).
- The 7.5 mile segment between SH-25 and E. 700 N. Road was constructed in 1934 and realigned to the east in 1984 (of which 0.75 of a mile is within the current APE). The realignment of this segment alters its location, design, and workmanship.
- For clarification, maps showing these routes are enclosed depicting the original 1920s alignment, the 1934 segment, the 1952 Bypass, and SH-25. Although the ITD Minute Books document the Barrymore Route, its exact location was not able to be verified through maps.

Based on this information, ITD and the FHWA has determined that the two segments of US-93 between M.P. 57.231 and M.P. 59.486 are non-contributing segments to the overall NRHP-eligible resource, and therefore, project actions to US-93 will result in No Historic Properties Affected.

Taking the above information into consideration, ITD requests that you review the information provided and reconsider your office's previous interpretation of effects regarding the project's impacts related to these segments of US-93 (53-17072).

If you have questions, please feel free to contact me at matt.kriegl@itd.idaho.gov or (208) 334-8188.

Thank You,



Matthew Kriegl
ITD Architectural Historian

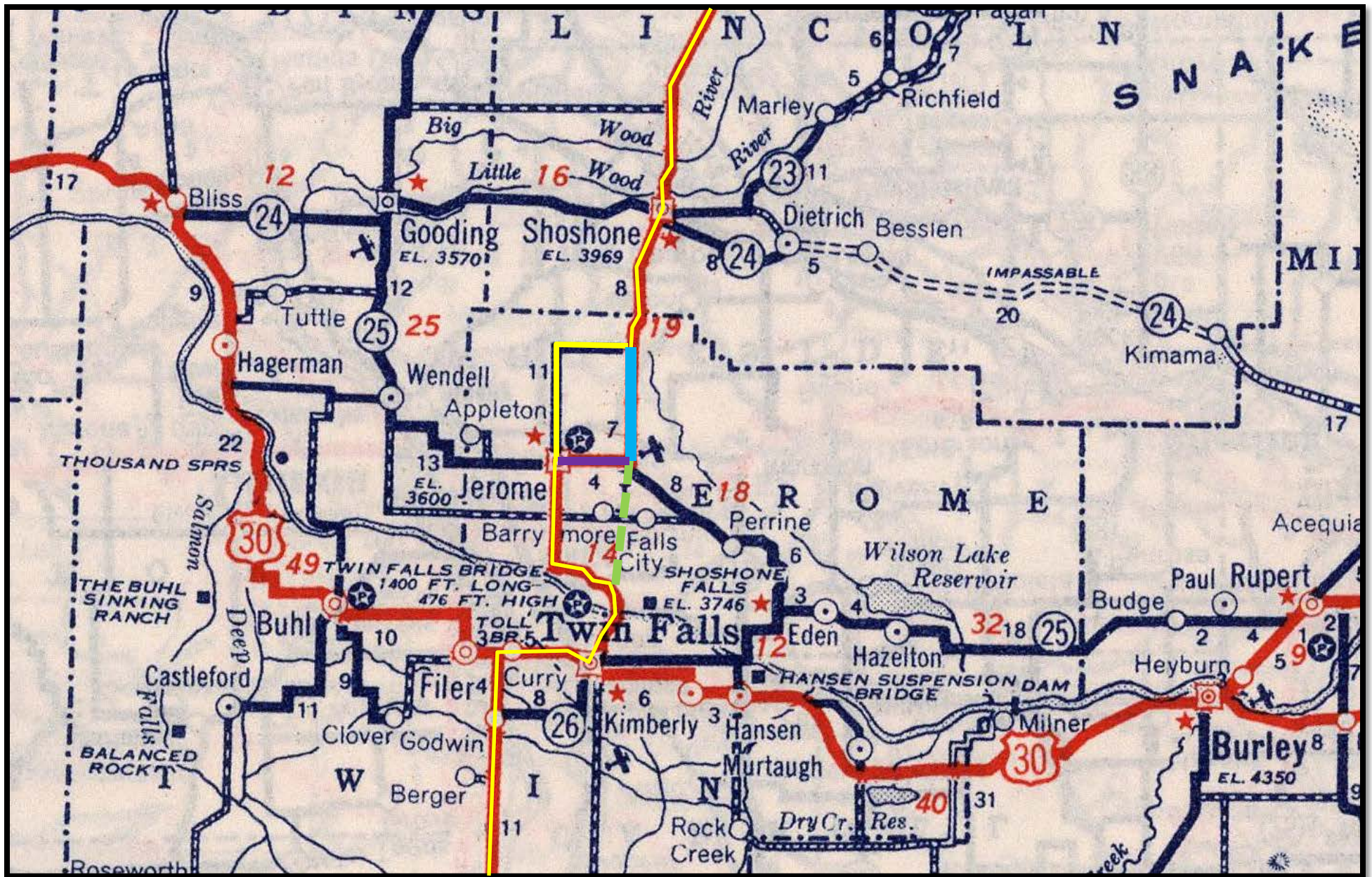


Figure 1. Rand McNally Road Map – Idaho (1940).

Key			
—	Original 1920s alignment	—	1952 Bypass
—	1934 segment	—	SH-25

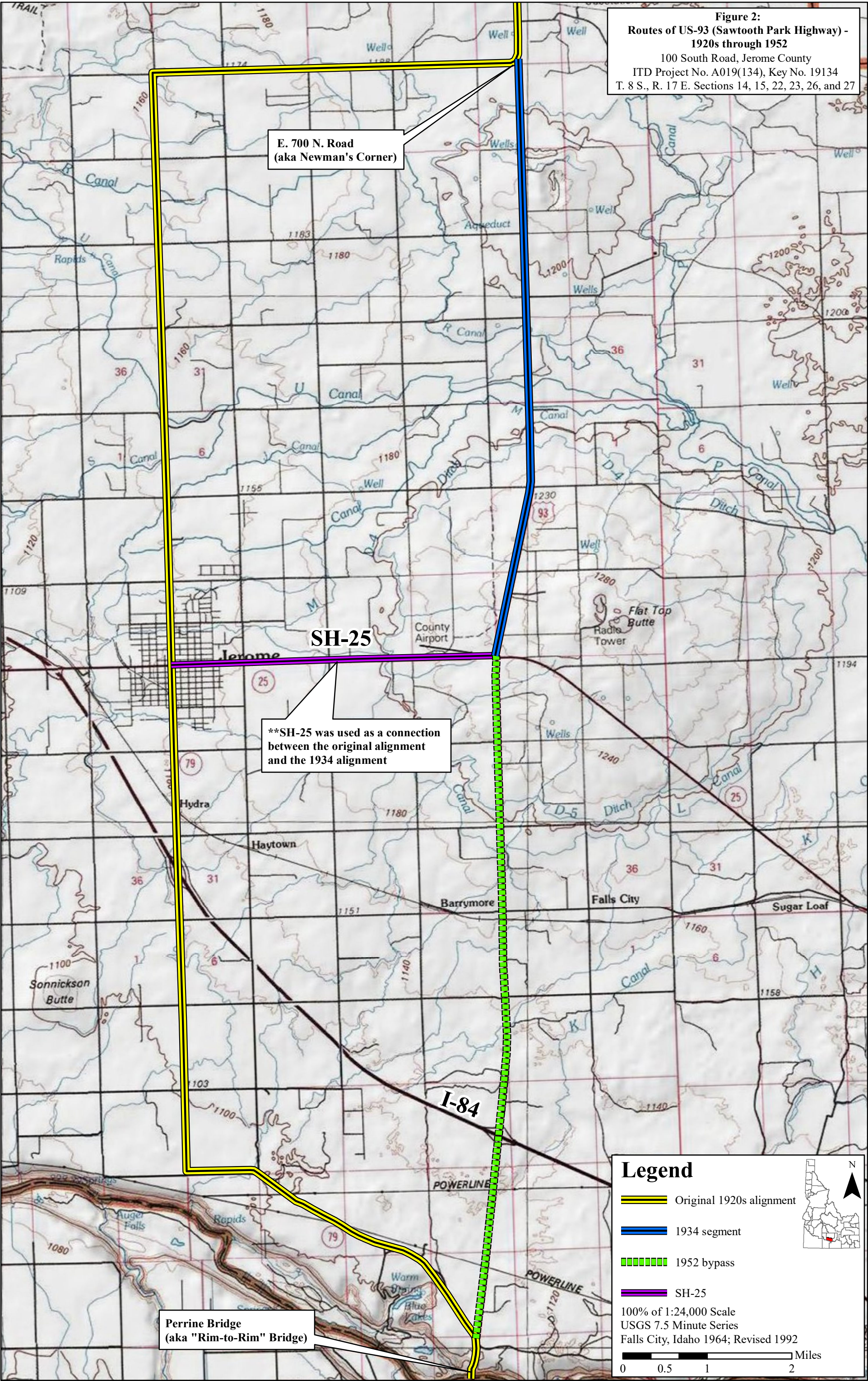


Figure 2. Routes of US-93 (Sawtooth Park Highway) - 1920s through 1952