



Bionomics Environmental Inc.
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June 14, 2019

Ashley Brown
Idaho State Historic Preservation Office
210 W. Main Street
Boise, Idaho 83702

Subject: 100 South, Jerome County ITD Project No. A019(134), Key No. 19134
Idaho State Historic Preservation Office Determination

Dear Ms. Brown:

The project is located on United States Highway 93 (US-93) from milepost (M.P.) 57.231 (south of the intersection of US-93 and 100 South Road) and 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; 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 the resort community of Ketchum/Sun Valley with the southern east-west crossroads of Interstate 84, and running south to Nevada. 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 as needed to access property.

The Area of Potential Effect (APE) was defined by the project description 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.

This investigation identified two previously recorded cultural resources (53-17072: US Highway 93) and (10JE546: Historic Scatter) and five historic resources that had not been previously recorded (Temp No. JR-01 through JR-05). Of the seven sites identified, five sites (JR-01 through JR-04 and 10JE546) are not eligible for the National Register of Historic Places (NRHP) and two sites (JR-05: State Highway 25 and 53-17072: US Highway 93) are eligible for the NRHP. This investigation has determined that a total of 2.255 miles of US-93 is within the current project area. Of the 2.255 miles of highway, 0.8 miles was realigned in 1985 and is no longer a contributing segment to the overall NRHP-eligible road. The remaining 1.455 miles is on its original c. 1950 alignment and is a contributing segment to the overall NRHP-eligible road. Currently this site retains integrity of location, design, materials, association, feeling, workmanship, and setting.

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Given the nature of this project, a majority of the highway's integrity will not be diminished. Project actions, which include constructing two lanes (to the west) equaling four through lanes (with a median) will not alter the historically significant characteristics that make US-93 eligible for the NRHP. The design aspect will only be marginally impacted with the linear design essentially remaining intact throughout the project area. Furthermore, the construction of two lanes to the west will not alter the location, setting, or materials. Additionally, the workmanship, feeling, and association will not be adversely affected since the highway is still being used as it was intended. Therefore, project impacts to US-93 will result in a **No Adverse Effect**.

On June 3, 2019, SHPO stated their concerns regarding the No Adverse Effect determination made by Bionomics Environmental and asked for a detailed integrity analysis of how the contributing segment of US-93 will not be adversely affected by the project. Bionomics, along with ITD Headquarters (as directed by FHWA) supports the determination of No Adverse Effect to US-93 (53-17072) for the following reasons:

- The Section 106 regulations state that an adverse effect occurs when an undertaking “may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.” Thus, an adverse effect finding focuses on the potential to “alter” historically significant characteristics and diminish the integrity of a historic property; if integrity is not diminished, there is no adverse effect.
- Currently the site is in good condition, and it retains the majority of its historic integrity. The site remains in its original location and appears generally unaltered, except in places where the materials have been previously changed, which is common for roads. This site retains integrity of location, design, setting, workmanship, feeling, and association.
- An analysis of the seven aspects of integrity, in regards to constructing two lanes west of US-93 between M.P. 57.231 and M.P. 59.486 (2.255-miles) are as follows:
 - Location – Constructing two lanes for 2.255-miles (along the 1.455 mile long contributing segment) west of US-93 will not alter the historic alignment of the road. The location of the original alignment will remain intact.
 - Design – US-93 is only eligible for the NRHP under Criterion A, not Criterion C. If the road were eligible under Criterion C, then constructing two lanes west of US-93 may alter the characteristics that make it eligible for the NRHP; however the design is not one of the characteristics that qualify this historic property for inclusion in the NRHP.
 - Setting – The existing road will not be moved or realigned, and while the setting may be different due to the construction of a two lane road to the west, this does not constitute an adverse effect. Furthermore, the current project is tying into a previously completed project to the south which also included the construction of two additional lanes to the west. Therefore, it could be argued that the overall setting has already been changed by another project.
 - Materials – US-93 is only eligible for the NRHP under Criterion A, not Criterion C. Additionally, the evolution of a road (i.e. materials, etc.) is a normal function of transportation and this segment will remain a gravel road mix with an asphalt overlay.
 - Workmanship – US-93 is only eligible for the NRHP under Criterion A, not Criterion C.
 - Feeling – While constructing two lanes west of US-93 does slightly alter the historic feeling, the highway as a whole is still being used as it was intended. Furthermore, the current project is tying into a completed project to the south which included the

- construction of two additional lanes to the west. Therefore, it could be argued that the overall feeling has already been changed by another project.
- Association – Constructing two lanes west of US-93 does not alter the historic association as the highway is still determined eligible as a whole.

For the reasons listed above, Bionomics and ITD feel that the proposed project actions would not alter the characteristics that qualify the resource for inclusion in the NRHP, and as such do not pose an adverse effect to the historic property. Therefore, we respectfully request that the determination remain a **No Adverse Effect** to the historic property (US-93).

Sincerely,



Jillian Martin
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