



IDAHO STATE
HISTORICAL
SOCIETY



Brad Little
Governor of Idaho

Janet Gallimore
Executive Director
State Historic
Preservation Officer

Administration:
2205 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2682
Fax: 208.334.2774

Idaho State Museum:
610 Julia Davis Dr.
Boise, Idaho 83702
208.334.2120

**Idaho State Archives
and State Records
Center:**
2205 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2620

**State Historic
Preservation Office:**
210 Main St.
Boise, Idaho 83702
208.334.3861

**Old Idaho Penitentiary
and Historic Sites:**
2445 Old Penitentiary Rd.
Boise, Idaho 83712
208.334.2844

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5 July 2019

Matthew Kriegl
ITD Architectural Historian
Idaho Transportation Department
3111 West State Street
Boise, Idaho 83707

**Re: 100 South Road, Jerome County / Key No. 19134/ SHPO#
2019-689**

Dear Mr. Kriegl,

Thank you for continuing consultation with our office on the above referenced project. We understand the scope of work includes construction of a new two-lane roadway to the west of the existing two-lane roadway (US-93), 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. The project is located on US-93 near 100 South Road in Jerome County, Idaho.

Pursuant to 36 CFR 800, we have applied the criteria of effect to the proposed undertakings. Based on the information received 24 May and 27 June 2019, our office does not concur that the overall project actions will have no adverse effect to historic properties. The SHPO finds an **Adverse Effect** to Historic Properties, specifically the contributing US-93 segment (IHSI 53-17072). The introduction of a median and an additional two lanes of traffic to the west will create a dual carriageway or divided highway. The eligible segment of US-93 is currently a two-lane highway with north-south traffic. As proposed, the project will affect the segment's integrity of feeling, design, and setting.

In the letter from Bionomics Environmental Inc., dated June 14, 2019, there was a misinterpretation of the aspects of integrity as they apply to Criterion A. It states on page 2, under 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.

This same argument was also made for workmanship. The assertion that design and workmanship are not characteristics that qualify this historic property for inclusion in the NRHP is not valid. There may be a different threshold to which the resource is held to, being eligible under Criterion A, but that does not disqualify these particular aspects of integrity. One must still evaluate all seven aspects of integrity for a property that is eligible under Criterion A. As stated in National Register Bulletin 15 (NRB 15):

A property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance.

It is our Office's opinion that these aspects of integrity are not precluded from examination, but are only held to a different threshold under Criterion A. As stated in the letter from Bionomics Environmental Inc., "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.'" As such, our Office has determined that this project will have an adverse effect to the feeling, design, and setting of the resources.

Design: the original design of US-93 in Jerome County was a rural two-lane north-south highway, this project will change the design to a dual carriageway or divided highway. The original segment will be connected at the north and south and be expanded to include two lanes at the west that will convey traffic to the south, while the original segment will only convey traffic to the north. Adding a median and two additional lanes will drastically alter the original design of the two-lane road.

Feeling: Since the road will become a dual carriage way or divided highway, the resource will no longer retain the feeling of a rural two-lane north-south highway that was built in 1950, and will now look like a modern divided highway.

Setting: although minor, the introduction of a median and two additional lanes will change the immediate setting of the resource.

We look forward to working with you, as well as other consulting parties to avoid, minimize, or mitigate this adverse effect. If you have any questions, please contact me via phone or email at 208.488.7463 or ashley.brown@ishs.idaho.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ashley Brown', with a stylized, cursive script.

Ashley Brown
Historical Review Officer
Idaho State Historic Preservation Office