April 19, 2021

Shawn Wheeler
PA Fish & Boat Commission
595 E. Rolling Ridge Drive
Bellefonte PA 16823

ER Project # 2021PR01430.004 (formerly ER # 2021-0001-049): Fish & Boat Commission, Fairview Hatchery Manager & Fish Management Building Demolitions, Fairview Township, Erie County, receipt of identification survey

Dear Mr. Wheeler,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution, and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Proposed Project
The proposed project consists of the demolition of the two-story frame dwelling (Hatchery Managers’ Dwelling, known as the Frank M. Thornton House) and the two story Fish Management Building (known as the Joshua Thornton House), both which are located on the Fairview State Fish Hatchery property which was constructed in 1976 and consist of approximately 87 acres of land including exterior concrete raceways and several other support buildings.

Above Ground Resources
Identification of Historic Properties
The PA Fish & Boat Commission property known as the Fairview Hatchery includes the Joshua C. Thornton House. Based on the information received and available in our files, it is the opinion of the Pennsylvania State Historic Preservation Officer that the following property is eligible for listing in the National Register of Historic Places:

The Joshua C. Thornton House, Resource # 2019RE00735 (previously Key # 015907), is eligible under Criterion C in the Area of Architecture, as a significant local expression of Italianate villa/Italianate residential property with good integrity. The proposed period of significance (POS) is 1870, the date of construction. The proposed boundary includes the current tax parcel and the historically associated landscape as the Italianate style sought to maximize the pastoral landscape vistas and landscape features in the setting of country houses. The circa 1980 garage, 1976 fish hatchery buildings and the c. 1900 Frank M. Thornton House would be considered non-contributing; while they are within the boundary of the resource, they were built outside of the POS for the Joshua C. Thornton House. This resource has not been evaluated for archaeological potential.

We concur the scope and level of effort utilized to identify historic properties for this project is appropriate. Our evaluation is based upon the information provided and available in our files for review. If National Register listing for this property is sought in the future, additional documentation of the property’s significance and integrity may be required to both verify this evaluation and satisfy the
requirements of the National Park Service (36 CFR Part 60). Thus, the outcome of the National Register listing process cannot be assured by this evaluation.

**Assessment of Effect**

In our opinion and based on the information received, this project will have an effect on **Joshua Thornton House, Resource # 2019RE00735 (formerly Key # 015907)** which is eligible for listing in the National Register of Historic Places. Furthermore, it is our opinion that this project will adversely affect the historic and architectural qualities that make the property eligible as the proposed project is the destruction of the property by demolition. You will need to continue to consult with the PA SHPO to seek ways to avoid, minimize, and/or mitigate the effects on historic properties.

Please note, if a federal permit is required or if federal funding is utilized, the federal agency, or those acting on their behalf, will need to continue to consult with our office, as well as identify and consult with other preservation stakeholders and notify the Advisory Council on Historic Preservation, pursuant to 36 CFR Part 800.

**Continued Consultation**

The Joshua C. Thornton is a rare remaining example of Italianate style architecture in this region. Therefore, it is necessary to consider options for its preservation. Please provide documentation of consideration of a variety of alternatives that avoid or minimize effects to the identified historic properties. The analysis should clearly state the problems to be solved/needs of the project and outline with supporting data the alternatives considered. The analysis should provide sufficient data and supporting documentation to demonstrate why a particular alternative is or is not viable. The data should not be manipulated to support a predetermined outcome; rather, the selection of the preferred alternative should be supported by the data itself.

Specific questions to be answered include:

- Why is removal of the historic house necessary? When was the last time it was used/occupied?
- Have alternatives that allow the house to be retained in its current location and continued to be used as housing or repurposed for another function/use been considered?
- Has selling of the property (and subdividing the parcel) been considered?
- Has lease of the property to allow for adaptive reuse and rehabilitation of the house been considered?

Please provide a written response outlining consideration of these questions along with supporting documentation.

**Archaeological Resources**

There is a high probability that archaeological resources are located in this project area. In our opinion, the activity described in your proposal should have no effect on such resources. Should the scope of the project be amended to include additional ground disturbing activity this office should be contacted immediately and a Phase I Archaeological Survey may be necessary to locate all potentially significant archaeological resources.

If you need further information concerning archaeological issues please consult Casey Hanson at chanson@pa.gov or (717) 772-0923. If you need further information on above ground resources please consult Cheryl Nagle at chnagle@pa.gov or (717) 772-4519.

Sincerely,

Douglas C. McLearen, Chief  
Division of Environmental Review