

Chapter 3: Designation Analysis

Introduction

For a determination to be made as to whether a resource should be considered for potential designation as a unit of the national park system, analyses are conducted based on criteria established by Congress in *Title III of Public Law 105-39* and in accordance with *NPS Management Policies 2006*. To be eligible for consideration, an area must:

- (1) possess nationally significant natural or cultural resources;
- (2) be a suitable addition to the system;
- (3) be a feasible addition to the system; and
- (4) require direct NPS management instead of alternative protection by other public agencies or the private sector.

This chapter evaluates the Coltsville Historic District and applies the criteria for designation as a potential unit of the national park system cited above.

National Significance Analysis

NPS Management Policies 2006 provide that a resource will be considered nationally significant if it meets all of the following criteria:

- (1) is an outstanding example of a particular type of resource;
- (2) possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage;
- (3) offers superlative opportunities for public enjoyment, or for scientific study; and
- (4) retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

The national significance of cultural resources is evaluated by applying the National Historic Landmark (NHL) criteria contained in 36 Code of Federal Regulations Part 65. National significance is ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture, and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association, and that:

are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or

are associated importantly with the lives of persons nationally significant in the history of the United States; or



Colt East Armory blue onion dome.
James C. O'Connell, National Park Service.

represent some great idea or ideal of the American people; or

embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for the study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or

are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or

have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

When evaluating national significance in congressionally authorized special resource studies, resources that have been designated as NHLs are considered to already have been determined to be nationally significant and require no further analysis. Resources associated with the Coltsville Historic District have been designated by the Secretary of the Interior as an NHL for reasons identified in the NHL nomination. Chapter 2 of this report contains much of that information. These resources, therefore, meet the criterion for national significance.

The study team confirmed that the resources of the district retain integrity. The Coltsville Historic District National Historic Landmark nomination states that Coltsville retains a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association. The location, setting, feeling, and association of Coltsville maintain their integrity since the site is the same one laid out by Samuel Colt in 1855 in Hartford's South Hartford. The Coltsville Historic District is a cohesive cultural landscape that reflects the industrial social hierarchy, with the Colt family and other managers residing in mansions on the hill overlooking the Colt factory and the homes of workers. Importantly, Coltsville maintains its association with Samuel Colt, Elizabeth Colt, and the Colt Fire Arms Company which they founded and developed. The factory complex, their residence, worker housing, and church and social institutions remain to interpret those associations.

The design, materials, and workmanship of the factory complex evolved over the years, reflecting the evolution of factory design and construction technologies through the latter 19th and early 20th centuries. The Coltsville buildings that remain from the period of significance (1855-1945) maintain their integrity of materials and workmanship, enabling the visitor to understand the evolution of the Colt Fire Arms factory. The exteriors appear very much as they did during the period of significance. The interiors have not housed substantial gun manufacturing operations for over 40 years (a limited amount of firearms design occurred in the Machine Shop until 1993). In recent decades, much of the space was subdivided for use by small businesses, artist studios, and a limited number of apartments. Between 2003 and 2008, a developer of the factory complex transformed the Machine Shop into office space, the brick warehouse into school and office use, and part of the South Armory into apartments. These buildings have been rehabilitated in compliance with the Secretary of the Interior's Standards regarding character-defining features such as windows, roofs, and facades.

The Italianate exterior of Armsmead has been modified, but it still retains much of its original architectural form and features. The interior has been altered to create apartments, but three public rooms remain relatively unchanged and retain much of the original decoration. Colt Park, which had contained the gardens of the Colt family before being bequeathed to the City of Hartford in 1905, now is used mainly for athletic fields, but the sense of the estate grounds can still be appreciated.

Ten multi-family worker tenements and nine "Potsdam" cottages remain. The worker houses are relatively unaltered from their historic appearance. The exteriors of the James Colt House and the Elizabeth Colt Rental Houses at 180 and 184 Wethersfield Avenue retain most of their original Italianate features. The exterior and interior of the Gothic Revival Church of the Good Shepherd and its Caldwell Colt Memorial Parish House appear very much as they did when they were built.



Colt East Armory. Jet Lowe, *Historic American Engineering Record*, National Park Service.

Suitability Analysis

According to National Park Service *Management Policies 2006*, an area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state or local governments; or the private sector.

It is important to note that the suitability analysis is not limited, simply, to whether resources are represented in the national park system, but the analysis extends to similar resources protected by other entities. Adequacy of representation is determined on a case-by-case basis by comparing the proposed area to other units in the national park system for differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses rarity of resources; interpretive and educational potential; and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the proposed new area would expand, enhance, or duplicate resource-protection or visitor-use opportunities found in other comparably managed areas.

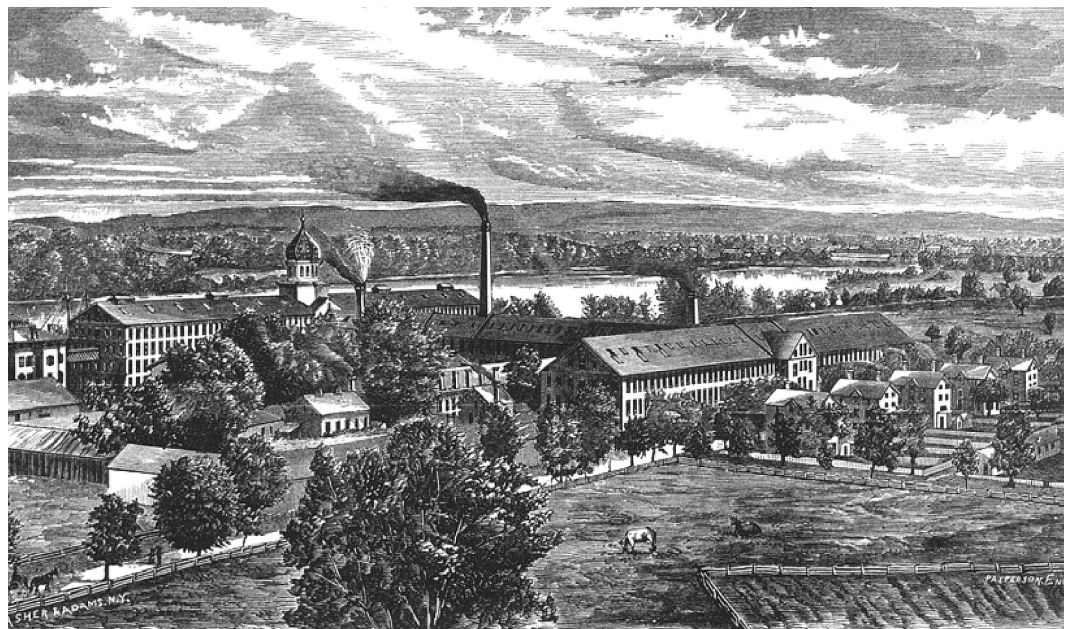
In evaluating the suitability of cultural resources within or outside the national park system, the Service uses its “Thematic Framework” (1994) for history and prehistory. The framework is an outline of major themes and concepts that help to conceptualize American history. It is used to assist in the identification of cultural resources that embody America’s past and to describe and analyze the

multiple layers of history encapsulated within each resource. The thematic framework reflects an interdisciplinary, less compartmentalized approach to American history through eight concepts that encompass the multi-faceted and interrelated nature of human experience. The concepts are:

- (1) Peopling Places;
- (2) Creating Social Institutions;
- (3) Expressing Cultural Values;
- (4) Shaping the Political Landscape;
- (5) Developing the American Economy;
- (6) Expanding Science and Technology;
- (7) Transforming the Environment;
- (8) Changing Role of the United States in the World Community.

Coltsville relates to three themes from the NPS Thematic Framework—*Developing the American Economy*, *Expanding Science and Technology*, and the *Changing Role of the United States in the World Community*.

View of Colt Fire Arms complex, looking southeast. The worker housing is visible on the right.
From *Asher & Adams Pictorial Album of American Industry*, 1876.



Developing the American Economy—This theme reflects the ways Americans have worked, including slavery, servitude, and non-wage, as well as paid labor. It also reflects the ways they have materially sustained themselves by the processes of extraction, agriculture, production, distribution, and consumption of goods and services. Topics that help define this theme include extraction and production, distribution and consumption, workers and work culture, labor organizations and protests, exchange and trade, and economic theory. These topics are commonly applicable to historic industrial districts such as the Coltsville Historic District.

Developing the American Economy: Production—This topic is illustrated by the pivotal role the Colt Fire Arms Company played in advancing large-scale American manufacturing.

Developing the American Economy: Distribution and Consumption—This topic is illustrated by the manner in which Colt handguns became important consumer products, particularly in the West. The company's marketing and distribution techniques played an important role in developing the American consumer society.

Developing the American Economy: Workers and Work Culture—This topic is reflected in Coltsville's ability to tell the stories of skilled precision manufacturing workers and portray their social life through worker housing and community institutions. Coltsville epitomizes the paternalistic nature of corporate worker policies during this period.

Expanding Science and Technology—This theme focuses on science, which is modern civilization’s way of organizing and conceptualizing knowledge about the world and the universe beyond. This is done through the physical sciences, the social sciences, and medicine. Technology is the application of human ingenuity to modification of the environment in both modern and traditional cultures. Topics that help define this theme include experimentation and invention, technological applications, scientific thought and theory, and effects on lifestyle and health.

Expanding Science and Technology: Experimentation and Invention, and Technological Applications—These themes are illustrated by the Colt Fire Arms Company’s inventions and technologically-advanced products and the development and applications of precision manufacturing processes that influenced other industries during the second half of the 19th century.

Changing Role of the United States in the World Community—This theme explores diplomacy, trade, cultural exchange, security and defense, expansionism—and, at times, imperialism. Topics that help define this theme include international relations, commerce, expansionism and imperialism, and immigration and emigration policies.

Changing Role of the United States in the World Community: Commerce—The Colt Fire Arms Company relates to this topic. The “American System of Manufacture,” as articulated by Samuel Colt at London’s Crystal Palace Exhibition in 1851 and implemented at his Hartford Armory, provided the basis for subsequent industrial expansion and allowed the United States to become a world power. Samuel Colt’s London factory (1853) was one of the first American manufacturing companies to locate abroad. This theme is also illustrated by arms development and production by the Colt Fire Arms Company during World War I and World War II, when the factory was a foundational element of America’s global military-industrial complex, providing weapons to allied countries such as Great Britain and Russia.

Units of the National Park System and Sites Managed by Others Related to the Themes

Within the national park system several units interpret resources related to the themes of *Developing the American Economy*, *Expanding Science and Technology* and the *Changing Role of the United States in the World Community*. The most comparable units are Lowell National Historical Park, Springfield Armory National Historic Site, Edison National Historical Park, and Paterson Great Falls National Historical Park.

Lowell National Historical Park (Massachusetts) tells the story of the development of American industrialization as it occurred in the textile industry. Lowell emphasizes the topics of *Developing the American Economy: Production; Workers and Work Culture*, as one of the first and most influential planned industrial communities in America. Lowell interprets mass production, Yankee working girls, immigrants, corporate paternalism, union organization, working and living conditions, and the consequences of deindustrialization. Lowell also interprets the theme *Expanding Science and Technology: Experimentation and Invention* by interpreting the role of industrial waterpower and the mechanical innovations that made the mass production of textiles possible.

Springfield Armory National Historic Site (Massachusetts) preserves and interprets the federally owned and operated Springfield Armory (1794-1968). Springfield Armory interprets the industrial processes that produced military firearms. Its exhibit features the Benton Small Arms Collection. Springfield Armory was a federal installation producing military armaments, therefore it does not provide an opportunity for understanding the entrepreneurial production and marketing of privately-owned weapons for mass consumption.

Harpers Ferry National Historical Park (West Virginia) includes the federal armory at Harpers Ferry (1799-1861), which was an early innovator in using interchangeable parts for the manufacture of rifles. Today, only the ruins remain of the armory.



The pistons that ran the machinery of the Colt East Armory can still be seen in the lobby beneath the blue onion dome. Jet Lowe, *Historic American Engineering Record*, National Park Service.

Edison National Historical Park (New Jersey) preserves and interprets the home and factory, as well as the inventions of Thomas Alva Edison, including the phonograph, movie camera, and alkaline storage battery. It also provides public understanding of how inventions were manufactured and commercialized by his company for mass distribution.

Paterson Great Falls National Historical Park (New Jersey) is in the process of being established pursuant to the recently enacted Omnibus Lands Management Act (Public Law 111-11). The Great Falls Historic District, of which the park is a part, is an industrial complex begun by Alexander Hamilton and the Society for Establishing Useful Manufacturers in 1791. It is significant as the first American attempt to harness the power of a major river for a planned industrial city. Multiple industries in Paterson included textile, silk and railroad locomotive manufacturing among others. Samuel Colt produced his first revolvers, between 1836 and 1841 in Paterson, New Jersey. The building used by Colt in Paterson exists as a ruin (it was subject to arson in the 1980s).

Other units of the national park system that interpret one or more of these themes include Saugus Iron Works National Historic Site (Massachusetts) and Hopewell Furnace National Historic Site (Massachusetts). Both units interpret the history of various phases of iron manufacturing. Rosie the Riveter/World War II Home Front National Historical Park (California) interprets the role of heavy industries, particularly shipyards, in supplying the war effort during World War II. It commemorates the contributions of women in the World War II workforce.

Several National Heritage Areas interpret industrial themes. The John H. Chafee Blackstone River Valley National Heritage Corridor (Massachusetts & Rhode Island) is one of the earliest industrialized areas of the country. It includes Slater Mill, an NHL in Pawtucket, Rhode Island, which was the first textile mill in America. Rivers of Steel National Heritage Area (Pennsylvania) interprets the steel industry in Southwestern Pennsylvania. The Delaware and Lehigh National Heritage Corridor (Pennsylvania) tells the story of how the Delaware and Lehigh Canals and associated railroads opened up anthracite coal mines in Eastern Pennsylvania, which helped fuel much industrial development. MotorCities National Heritage Area (Michigan) tells the story of automobile manufacturing. Of the several themes interpreted by the Essex National Heritage Area (Massachusetts), the shipbuilding, shoe, and textile industries are among them. The Hudson River Valley National Heritage Area (New York) includes industry and commerce among its heritage themes.

The suitability analysis also examines whether these themes are represented at “protected areas” managed by private entities. There are many sites operated by non-profit entities interpreting industrial enterprises.

Aspects of firearms industry history and precision manufacturing are interpreted at the American Precision Museum (Robbins & Lawrence Armory & Machine Shop NHL) in Windsor, Vermont. The American Precision Museum focuses on interpreting its large collection of machine tools. The exhibit does not treat the broader technological, business, and social implications of manufacturing and does not carry the story into the 20th century. The Eli Whitney Museum in Hamden, Connecticut, located at the site of Eli Whitney’s firearms factory, focuses primarily on K-12 science and technology education and does little to interpret the history of the Whitney factory and precision manufacturing.

The Smithsonian Institution and the Henry Ford Museum, in Dearborn, Michigan, have large collections of many kinds of manufacturing machinery, much of which is not on public display. The Hagley Museum, in Wilmington, Delaware, interprets various aspects of American industrial history, including the gunpowder and explosives manufacturing undertaken in the Brandywine Valley, most notably by the DuPont Company.

There are a number of museums across the country displaying collections of historic firearms, though they tend not to focus on the manufacturing and business aspects of the story. One of the leading collections of Colt firearms is at the Cody Firearms Museum, which is part of the Buffalo Bill Historical Center in Cody, Wyoming.

In Hartford, the Museum of Connecticut History and the Wadsworth Atheneum Museum of Art each have collections of Colt firearms, machinery, and memorabilia related to Samuel and



Elizabeth Colt and the Colt Fire Arms Company. Both of these museums have indicated an interest in participating in collaborative efforts to interpret Coltsville in partnership with the National Park Service.

Coltsville enhances appreciation of the branch of industrialization based on precision manufacturing, a class of industry that is under-represented in the current listing of NHLs. NHLs such as the Old Slater Mill in Pawtucket, Rhode Island, the Harrisville mill village in Harrisville, New Hampshire, the Boston Manufacturing Company mills in Waltham, Massachusetts, the Lowell National Historic Park, the Lowell Locks and Canals Historic District in Lowell, Massachusetts, and the Cheney Brothers silk mills Historic District in Manchester, Connecticut, illustrate textile manufacturing, a branch of industrialization whose impacts were quite different from those of precision manufacturing.

Despite the number of National Park units and private “protected areas” that interpret industrial history, no site fully interprets precision manufacturing or the large-scale private-sector firearms manufacturing that developed during the second half of the 19th century.

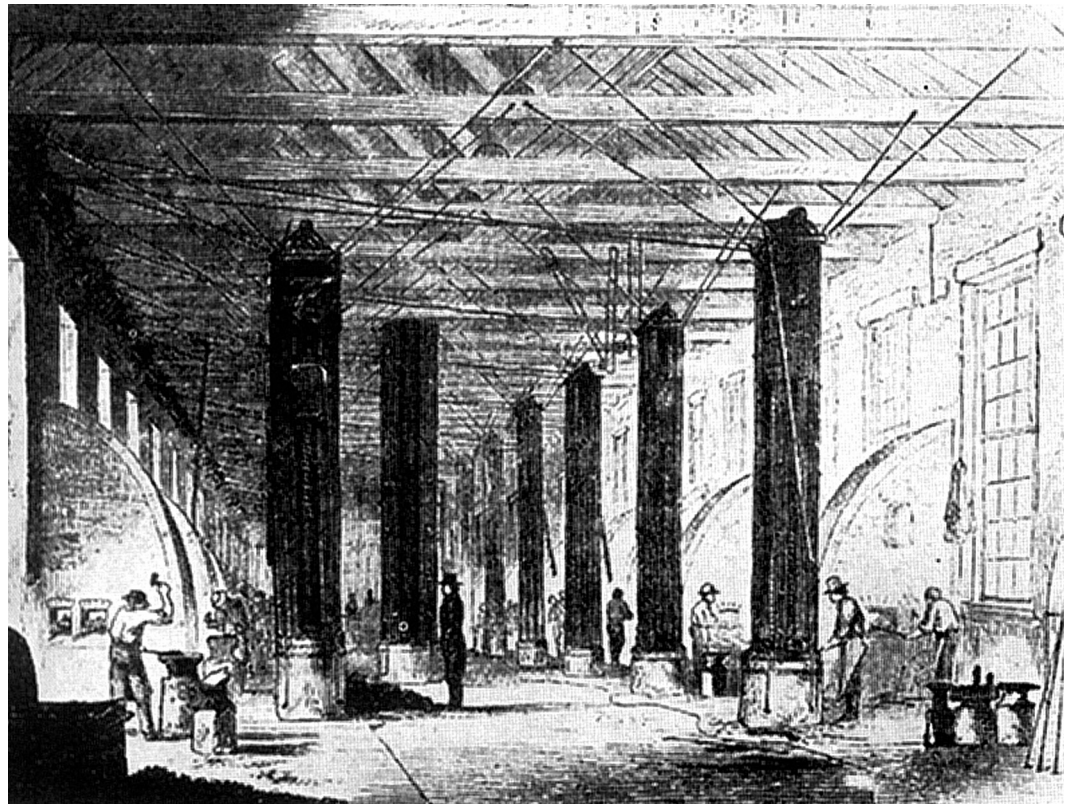
Based upon the preceding analysis and that in Chapter 2 of this report, the following conclusions have emerged:

- Coltsville provides a unique opportunity to interpret the NPS Thematic Framework themes of *Developing the American Economy*, *Expanding Science and Technology*, and *the Changing Role of the United States in the World Community*. Potential visitor interpretive experiences at Coltsville include:
 - (1) firearms manufacturing and the roles of Samuel and Elizabeth Colt;
 - (2) precision technology and its impact upon other products, such as sewing machines, typewriters, bicycles, and even automobiles;
 - (3) the importance of entrepreneurship and marketing in developing industrial enterprises; and
 - (4) the life of an urban industrial community, including its owners, managers and workers.
- Of the national park system units that interpret industrial history, only the Springfield Armory NHS interprets firearms manufacturing, and the site focuses mainly on the military development of firearms, since the armory was a federal military installation.
- Coltsville has the potential to go well beyond the Springfield Armory NHS in the interpretation of precision technology, entrepreneurship and business marketing, and the



Samuel Colt often gave specimens of his firearms as gifts to notables and those who might purchase his firearms in bulk. The Colt Company gave this presentation New Model Belt Pistol, .36 caliber to a U.S. Navy official during the Civil War. Details shown. *Wadsworth Atheneum Museum of Art. Gift of Mrs. Charles W. Butler, 1932.5.*

The interior of the Colt forging shop. Innovations in forging, developed by Armory Superintendent Elisha K. Root, were of paramount importance in propelling the Colt Company to the forefront of metalworking technology. The interior, including the distinctive wooden trusses (but absent the equipment), appears today much as it does in the engraving. From *U.S. Magazine*, March, 1857.



evolution of industrial communities. The Colt Fire Arms Company adapted and improved upon the Springfield Armory's manufacturing techniques for private enterprise, organized them to produce innovative consumer products, established a strong international brand identity, and disseminated innovative manufacturing technologies to several other major industries.

Historians see a fundamental distinction between the textile industry and precision manufacturing, which has been technologically more advanced and has led to the rise of such industries as sewing machines, typewriters, bicycles, automobiles, and aircraft engines. University of Massachusetts-Amherst historian Bruce Laurie regards the precision manufacturing pioneered by the Springfield Armory and the Colt Fire Arms Company as representative of the "Second Industrial Revolution," which marked an advance over the textile industry represented at Lowell, Massachusetts, and which was indicative of the "First Industrial Revolution":

The Second Industrial Revolution catapulted this nation to world leadership in technology and productivity, projecting it far beyond the capacity of the Lowells of America. No nation ever achieved sustained greatness on the First Industrial Revolution and none ever will; it was the Second Industrial Revolution that made this nation an industrial power.¹

- The Colt Fire Arms factory represents the acme of precision manufacturing, as it developed in the Connecticut River Valley. The National Park Service's *Connecticut River Valley Special Reconnaissance Study* (1998) found that precision manufacturing created a distinctive, highly advanced industrial region in the Connecticut River Valley:

Precision manufacturing is associated with a distinctive social and architectural landscape, paralleling but different from the complexes formed by the textile industry elsewhere in New England, or the heavy industry of Pennsylvania. The higher skill level and consequent higher earnings of many workers in the precision trades seems to have encouraged the development of more prosperous, stable communities. There was a prestige associated with arms-making, particularly in manufacturing the weapons used in national defense. Metalworking plants were usually quieter and less visibly polluting, so they were more acceptable as neighbors.

William Hosley, in *Colt: The Making of an American Legend* (1996), wrote that the Connecticut River Valley in the 1850s was “what California’s Silicon Valley is today, the vanguard of an internationally significant, technology-based transformation that changed the world of work.” Just as the textile industry developed across much of Eastern New England, the steel industry arose in Pennsylvania, and the auto industry became dominant in Michigan, firearms and precision manufacturing emerged in the corridor stretching from Bridgeport and New Haven to Hartford, Connecticut, and Springfield, Massachusetts, to Windsor, Vermont.

In conclusion, this study finds that Coltsville offers an opportunity to provide public understanding and appreciation of the nationally significant story of the development of the private-sector firearms manufacturing during the second half of the 19th and early 20th centuries. With a comprehensive ensemble of industrial structures and associated buildings, Coltsville has significant interpretive and educational potential to tell the stories of precision manufacturing, innovative branding and entrepreneurial business organization, and the development of an integrated industrial community. The collections of Colt firearms and memorabilia and precision manufacturing equipment at the Wadsworth Atheneum Museum of Art and the Museum of Connecticut History could complement Coltsville in telling the Colt Firearms Company story. The analysis conducted during the course of this study indicates that the Colt Fire Arms factory and related structures in the Coltsville NHL district are suitable for inclusion in the National Park System.

Feasibility Analysis

NPS *Management Policies 2006* outlines criteria for evaluating the feasibility of new units proposed for addition to the national park system:

To be feasible as a new unit of the national park system, an area must (1) be of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries); and (2) be capable of efficient administration by the NPS at a reasonable cost.

In evaluating feasibility, the Service considers a variety of factors, such as: size; boundary configurations; current and potential uses of the study area and surrounding lands; land ownership patterns; public enjoyment potential; costs associated with acquisition, development, restoration, and operation; access; current and potential threats to the resources; existing degradation of resources; staffing requirements; local planning and zoning for the study area; the level of local and general public support; and the economic/ socioeconomic impacts of designation as a unit of the national park system.

The feasibility evaluation also considers the ability of the National Park Service to undertake new management responsibilities in light of current and projected constraints on funding and personnel.

To assist in the determination of the feasibility of establishing a unit of the national park system at Coltsville Historic District, the Coltsville Ad Hoc Committee obtained funding from the State of Connecticut’s Commission on Culture and Tourism to engage a consultant to examine various potential visitor experience scenarios at the site and presented a report to the NPS study team for evaluation. The consultant team was headed by Museum Insight and included Roberts Consulting, objectIdea, and Economic Stewardship. Working with the Coltsville Ad Hoc Committee, the consultant team developed a report “*Coltsville National Park Visitor Experience Study*” (December, 2008). As part of the study process, the consultant team met with local stakeholder groups, including the owner of the Colt East Armory, to ascertain their commitments to a potential Coltsville national park unit.

The study outlined three potential scenarios, which differed primarily in the range of Coltsville Historic District resources that would be available to the visitors. The study assumed that the then developer of Colt Gateway would make available space in the East Armory for a contact station/ visitor center under each scenario. The developer indicated a general interest in making space available, but made no tangible commitment to do so. It is important to note that the management of the East Armory has changed since the consultant’s study was completed. A new corporation, Urban Smart Growth, has been in the process of management and ownership transition.

The Coltsville visitor experience proposed in the report would be focused on the East Armory and the overall Coltsville Historic District, with opportunities to view and learn about Armsmear, worker housing, Colt Park, the Church of the Good Shepherd, and the Caldwell Colt Memorial Parish House. These scenarios assume that the NPS would manage an area within the East Armory dedicated to an NPS contact station/visitor center and that other partners would provide financial and technical resources, and loan Colt-related artifacts. The three scenarios are:

Basic Scenario—The resources available in this scenario would be limited to a relatively small contact station located on the first level of the East Armory. The contact station would provide information for visitors and would serve as a base for weekend ranger guided tours of the Coltsville Historic District NHL. This scenario proposes a 1,500-square foot contact station and interpretive signage at key locations around the historic district. The scenario assumes limited staff assigned from the Springfield Armory will be available to conduct the weekend tours. Capital costs are estimated at \$700,000. Annual operational costs are estimated at \$150,000.

East Armory Scenario—In this scenario, visitors would have access to all four levels of the historic East Armory, where much of the firearm manufacturing took place. It would include a more extensive contact station, an interpretive exhibit with artifacts from the Wadsworth Atheneum Museum of Art and the Connecticut State Museum, a multimedia experience in the East Armory, and an observation area under the blue onion dome with views over the site to the rest of the city. This scenario would comprise 10,000 square feet in the East Armory. It would feature a Colt Manufacturing Multimedia Experience that would be modeled on the Flour Tower at the Mill City Museum in Minneapolis. Visitors would be seated in a freight elevator stopping at four floors of the factory. At each floor doors would open and multimedia recreations would represent activities on each of the manufacturing floors without having to dedicate large sections of each floor to the visitor experience. The multimedia techniques could allow visitors to learn about firearm manufacturing, Samuel and Elizabeth Colt, and listen to oral histories from employees. A 2,500-square foot fourth-floor Colt gallery and observation area would provide interpretive panels and a view over the Coltsville Historic District. Costs associated with this scenario are estimated at \$6,800,000 in capital improvements and \$300,000 for annual operations. The facilities would be open daily throughout the year with on-site NPS staff. Costs would be shared among federal, state and local governments, and corporate partners.

Full Site Scenario—This scenario would include everything in the East Armory Scenario as well as implementation of a Cultural Landscape Master Plan that would make the entire Coltsville Historic District inviting and walkable. It would include physical linkages and complementary experiences at the Riverfront and the Botanical Garden in Colt Park. In addition to the 10,000 square feet utilized in the East Armory Scenario, this scenario would use an additional 5,000 square feet in the East Armory for interpretive and educational programming. Costs associated with this scenario are estimated at \$21,000,000 for capital improvements and \$330,000 for annual operations. Costs would be shared among federal, state and local governments, and corporate partners.

The NPS study team drew upon these three scenarios developed in the Coltsville National Park Visitor Experience Study to examine their feasibility for a potential unit of the national park system. Although the scenarios may prove appropriate for differing intensities of visitor experience, none of the parties mentioned in the scenarios, most importantly the developer of the Colt East Armory, have made tangible commitments that could lead to the required feasibility findings in this special resource study.

The following is an evaluation of Coltsville in accordance with the NPS *Management Policies 2006* feasibility criteria.

Size & Configuration: This special resource study concludes that Coltsville is of sufficient size and configuration to permit adequate resource protection and visitor experiences. The boundary of a potential unit at Coltsville would be coterminous with the Coltsville Historic District NHL. The district includes 10 industrial buildings; 19 worker housing buildings; the

Samuel Colt Home (Armsmear) National Historic Landmark (NHL); the Colt Dike, which runs along Warwarne Avenue and Van Dyke Avenue; the 105-acre Colt Park, originally part of the Armsmear grounds; the Church of the Good Shepherd and the Caldwell Colt Memorial Parish House.

Building Uses & Land Ownership: The original developer of the Colt Gateway project, owner of all 10 factory buildings, was redeveloping the factory buildings for office, retail, and residential uses prior to 2009. As indicated previously, these properties are in the process of being transferred to a new management group—Urban Smart Growth. Since ownership and future plans for the Colt factory buildings remain uncertain, it is impossible for any party to make commitments that factory buildings would be available for a national park unit. The 10 worker houses were rehabilitated in the 1980s as 55 condominiums and are privately owned. The nine “Potsdam” cottages are also privately owned. Colt Park is owned and managed by the City of Hartford. Armsmear is owned and managed by the Colt Trust. The Church of the Good Shepherd and the Caldwell Colt Memorial Parish House serve an Episcopalian congregation.

Access: The study team cannot make positive findings related to public access to any structures at Coltsville. While the study team met with the previous Colt Gateway developer and understood that a proposal would be forthcoming regarding use of properties, no proposal was ever submitted. No commitments to permit visitors internal access to the Colt Fire Arms factory buildings currently exist. The new developer, Urban Smart Growth, has recently expressed strong interest in a NPS presence at the site, but discussions of such arrangements are somewhat premature during the transition phase of ownership of the properties.

The *Coltsville National Park Visitor Experience Study* had a perspective that the Basic Scenario would require interior access to 1,500 square feet in the historic East Armory to provide a minimal visitor experience. The East Armory and Full Site Scenarios in the *Coltsville National Park Visitor Experience Study* would require up to 15,000 square feet in the East Armory. NPS staff and the Coltsville Ad Hoc Committee and its consultants have observed that internal access to the East Armory, the historic core of the Colt Fire Arms Company, would be necessary to providing a meaningful visitor experience at Coltsville since this important resource is still extant and is potentially available for public visitation.

External access to factory views could be available, but it has become apparent that the quality of the visitor experience would be inadequate in comparison to that provided by internal access to the East Armory.

No offers of access have been received from the Church of the Good Shepherd and the Caldwell Colt Memorial Parish House. The workers housing and “Potsdam Cottages” would not be suitable for visitor access since they are private residences, but agreements for the placement of exterior interpretive devices would enhance the visitor experience. Colt Park would be suitable for visitation if assurances were received from the City of Hartford that management practices at the site would be compatible with its designation as a component of a unit of the national park system.

Access to even a small portion of Armsmear would significantly enhance visitor understanding of this NHL and the family life of Samuel and Elizabeth Colt, but this may not be possible. At an April 2009 meeting, a representative of Armsmear indicated that, since the house is currently a private multi-unit residence, it would be problematic to allow internal visitor access to the home.

Access to the Coltsville area by motor vehicle, public transit, and by walking is relatively easy because the neighborhood directly abuts the south side of downtown Hartford. Interstate-91 passes directly in front of the Colt East Armory and has exits within one mile of the site. Several major Hartford streets, including Main Street, Wethersfield Avenue, Whitehead Highway, Charter Oak Avenue, and Columbus Boulevard, connect to Coltsville. A local bus line passes directly by the former Colt Fire Arms factory. Parking could be provided in a large parking lot owned by the Colt Gateway developer.

Threats to the Resource & Degradation of Resources: The Colt Fire Arms factory buildings have suffered gradual disinvestment since the end of World War II and the subsequent move of the company headquarters to West Hartford, Connecticut. Some of the buildings have been vacant, while others have been used for purposes such as warehousing and artist studios. In 2003, the original Colt Gateway developer, Homes for America Holdings, Inc., started rehabilitating and leasing the former factory space. In order to obtain federal historic preservation tax credits, the developer followed the Secretary of the Interior's Standards for the Treatment of Historic Properties regarding character-defining features such as windows, roofs, and facades. The buildings are structurally sound and the factory complex maintains much of its historic integrity. Rehabilitation of the Colt factory buildings is only partially completed, and there is new ownership of the site. There is no assurance of continued preservation efforts at the site. The 10 worker houses and nine "Potsdam" cottages are privately owned. Colt Park is owned and managed by the City of Hartford. Armsmear is owned and managed by the Colt Trust. The Church of the Good Shepherd and the Caldwell Colt Memorial Parish House are an Episcopalian parish. All these properties are well maintained and do not appear to be at risk.

Public Enjoyment Potential: Coltsville's historic resources are extensive and have the potential to provide the public with a viable and educational national park experience. Access to the industrial buildings, church properties, the Colt Park and Armsmear, as well as exhibits and the use of collections from area institutions, would provide visitors with an understanding and appreciation of the Colts, precision manufacturing at the factories, and workers stories. Until public access issues are resolved, local commitments for sharing financial resources and collections cannot be fully ascertained.

Costs of Acquisition, Restoration, Development, and Operation: Without tangible commitments to make space available in the Colt East Armory for public visitation and knowledge of the terms of access to other structures at Coltsville, the study team is unable to develop cost estimates, or to verify the estimates in the Coltsville National Park Visitor Experience Study for the Coltsville Ad Hoc Committee. Financial feasibility would in large part depend upon access and partnerships with other public and private entities. It would be enhanced by local financial contributions. No firm offers of financial assistance have been forthcoming during the study, although supporters of unit designation have consistently indicated that if Coltsville becomes a unit of the national park system, such assistance could become available.

Staffing Requirements: The size and scope of a potential unit of the national park system at Coltsville is uncertain. Therefore, the study team is unable to estimate staffing requirements or to assess the potential level of visitation.

Local Planning and Zoning for the Study Area: The Coltsville study area is located in two City of Hartford land use zones. The 10 former industrial buildings, located between Huyshope Avenue and Van Dyke Avenue, are located in an Industrial District-2 zone, which also is part of an Industrial Re-Use Overlay District. The overlay district has been established to encourage reuse of industrial buildings constructed before World War II for residential and commercial purposes as well as industrial purposes. The overlay district allows the creation of residential units in former industrial space as long as they are located above commercial or industrial uses or are physically separated from such uses if they are on the same level. The plans to build residential apartments in the former Colt Fire Arms factory meet the zoning requirements.

The former worker housing is in a Residential-3 zone, which is considered a Medium Density Residential District. This zoning permits the existing multi-family housing in this area to exist by right.

Hartford is implementing a downtown revitalization strategy that seeks to knit together the fragmented sections of the downtown into a cohesive whole. Much attention is being focused on redeveloping the Riverfront area known as Adriaen's Landing. This is the site of Connecticut Convention Center, the Connecticut Center for Science & Exploration, the Hartford Marriott Downtown Hotel, and new shops. Located to the south, Coltsville serves as an extension of the downtown revitalization activity. The City of Hartford considers the redevelopment of Coltsville and the establishment of a national park unit there an important part of its urban redevelopment efforts.



The Church of the Good Shepherd was built by Elizabeth Colt as a memorial to her deceased husband in 1869. Designed by architect Edward Tuckerman Potter. *James C. O'Connell, National Park Service.*

Level of Local Public Support: There have been strong indications of local support for designating Coltsville as a unit of the national park system. The Coltsville Ad Hoc Committee's membership represents a broad cross-section of state and local governments and nonprofit organizations. At public meetings concerning this study, there has been widespread support expressed for the designation of a unit of the national park system. *The Hartford Courant*, the city's daily newspaper, has published several editorials supporting the establishment of a national park at Coltsville.

Economic/Socioeconomic Impacts of Designation as Unit of National Park System:

Without the ability to determine exactly how a potential unit of the national park system would be configured at Coltsville, the study team is unable to assess economic/socioeconomic impacts.

NPS Management Policies 2006 provides that in a special resource study an overall evaluation of feasibility will be made after taking into account all of the above factors. However, evaluations may sometimes identify concerns or conditions, rather than simply reach a yes or no conclusion. For example, some new areas may be feasible additions to the national park system only if landowners are willing to sell, or the boundary encompasses specific areas necessary for visitor access, or state or local governments will provide appropriate assurances that adjacent land uses will remain compatible with the study area's resources and values.

In the case of Coltsville, a number of factors have extended the study process, particularly in determining the feasibility of establishing a unit of the national park system. These include the study team's inability to ascertain what interior spaces would be available for visitor use and park management and what specific local commitments there may be to provide, through loans or permanent exhibits, resources associated with the Colt family or the operations and products of the Colt factories. While there are letters of interest in the study record by state and local organizations interested in participating with the NPS and in loaning Colt associated resources, at this point, there is no place determined as the locus of a potential park unit.

Largely because of the evolving situation regarding ownership and use of the Colt factory complex and the lack of public access to interior spaces of many of the Coltsville Historic District's resources,

this study must conclude that the feasibility criterion for establishing a unit of the national park system at Coltsville cannot be met under the present circumstances. It is possible that as ownership issues are resolved, development plans crystallized, and partnerships better established among potentially contributing institutions and organizations, that the feasibility criterion could be met in the future. More specific proposals devised collaboratively by the new developer of the factory complex, the state, city, and institutions that have Colt associated resources could provide the necessary public access to structures and other resources and collections within a cost range that would enable feasibility to be established. Such a collaborative effort should address the feasibility issues raised in this report and provide necessary information regarding how each of the partners would contribute to the overall viability of establishing and operating a sustainable unit of the national park system.

Analysis of the Need for National Park Service Management

As with the feasibility criteria, it impossible at this time to determine that a need for NPS management exists. The study team has been unable to determine what resources would actually be managed and protected by the NPS and what level of visitation and visitor services may be required. Until such time as the feasibility findings are resolved, the study must conclude that there is no current need for NPS management of the Coltsville resources.

Study Conclusions

This congressionally authorized Coltsville Special Resource Study concludes that the resources in the Coltsville Historic District meet the criteria for national significance and suitability but, at present, do not meet the criteria for feasibility and need for NPS management. As stated above, it is possible that the feasibility and need for NPS management criteria could potentially be met if the feasibility issues discussed in this report are resolved over time.

Environmental Compliance

Since this study concludes that the resources associated with the Coltsville Historic District NHL do not fully meet the criteria for potential designation as a unit of the national park system, no federal action is anticipated. Therefore, a notice will be placed in the Federal Register that an environmental impact statement will not be prepared.

Endnote

¹ Bruce Laurie, "The Second Industrial Revolution," Background Statement Prepared for Springfield Armory National Historic Site (*Amherst, MA: University of Massachusetts-Amherst, History Department, January 3, 2005*).

Chapter 4: Consultation and Public Outreach

This chapter describes the required consultation procedures, public meetings, and comments related to the preparation of the Coltsville Special Resource Study.

Notice of Intent

A notice of intent to conduct a Special Resources Study/Environmental Impact Statement was published in the Federal Register on September 2, 2004.

Public Scoping Meeting

In accordance with the National Environmental Policy Act (NEPA), a public scoping meeting for the Coltsville Special Resource Study took place on October 20, 2004. The meeting, which was attended by approximately 100 people, provided an opportunity for members of the public to express specific issues that the study should address. Twenty-seven people spoke at the public scoping meeting, virtually every person expressing support for the establishment of unit of the national park system at Coltsville. Congressman John B. Larson spoke in favor of a national park site at Coltsville, stating he had sponsored the Congressional legislation to undertake the Coltsville SRS. Aides of Senator Christopher Dodd and Senator Joseph Lieberman read statements expressing the senators' support for a national park. Hartford Mayor Eddie Perez also spoke in favor of a national park designation.

Additional Meetings and Public Participation

Public meetings to discuss and answer questions about the National Historic Landmark (NHL) nomination for Coltsville were held on August 3, 2006, and August 8, 2007. NPS staff, which assisted in preparing the NHL nomination, made a presentation. Residents of the immediate area, include residents of the historic Colt housing, were invited to attend. Attendees expressed strong support for the Coltsville NHL nomination. Members of the study team met periodically with staff of Congressman John B. Larson, Senator Christopher Dodd, and Senator Joseph Lieberman for briefings, as well as members of the Coltsville Ad Hoc Committee at the committee's request. Meetings were conducted with state and local officials, nonprofit stakeholders related to Coltsville, and the Colt Gateway developers. Various ad hoc contacts with members of the public occurred during the study. A briefing for congressional staff and members of the Ad Hoc Committee was conducted in April 2009 to inform them of the conclusions of the study.

Written Communication

The Coltsville Ad Hoc Committee, which sponsored the consultant study "Coltsville National Park Visitor Experience Study" (December, 2008), sought letters of support from stakeholders for creating a national park unit, as discussed in the report. Letters of support were submitted by Connecticut Governor M. Jodi Rell (December 17, 2008); Hartford Mayor Eddie A. Perez (December 12, 2008); Connecticut State Historic Preservation Officer and Executive Director of the Connecticut Commission on Culture & Tourism Karen Senich; Connecticut State Librarian

Kendall Wiggin; Connecticut Humanities Council Executive Director Bruce Fraser; Connecticut Trust for Historic Preservation Executive Director Helen Higgins; Wadsworth Atheneum Museum of Art Director Susan L. Talbott; Riverfront Recapture President Joseph R. Marfuggi; CSS/CON Inc. Executive Director Carol Coburn; Hartford Botanical Garden Planning Committee President Lisa Musumeci.

Consultation

Formal consultation was undertaken with the U.S. Fish and Wildlife Service (USFWS), the Connecticut State Historic Preservation Officer (Connecticut Commission on Culture and Tourism), and the Connecticut Department of Environmental Protection. A letter (November, 2007) was sent to USFWS concerning any potential threats to natural resources, including threatened and endangered species. No response letter has been received, but the USFWS website was consulted and no threatened and endangered species were identified. The Connecticut Department of Environmental Protection (May, 2006) indicated that there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species that occur at the site. The Connecticut State Historic Preservation Officer (SHPO) expressed (December, 2007) support for establishing an NPS unit at Coltsville. The Connecticut SHPO was active in preparing the Coltsville NHL nomination and was a member of the Coltsville Ad Hoc Committee. The NPS Northeast Region ethnographer has advised that there are no American Indian Tribes that may have interests in the study area. See Appendix 4: Letters of Consultation.