



Chapter Three | Designation Analysis

Analyses of National Significance, Suitability,
Feasibility and Need for NPS Management

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Paterson, NJ, Great Falls. NPS Photo.

Designation Analysis

Analyses of National Significance, Suitability, Feasibility and Need for NPS Management

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. 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 Great Falls Historic District and applies the criteria for designation as a potential unit of the national park system cited above.

National Significance of the Great Falls Historic District

NPS Management Policies 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.

National significance for cultural resources is evaluated by applying the NHL criteria contained in 36 CFR 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:

1. 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
2. are associated importantly with the lives of persons nationally significant in the history of the United States; or
3. represent some great idea or ideal of the American people; or
4. 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
5. 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
6. 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.

National significance for natural resources can be evaluated by applying the NNL criteria contained in 36 CFR Part 62. Within the NNL Program, national significance describes an area that is one of the best examples of a biological or geological feature known to be characteristic of a given natural region. Such features include terrestrial and aquatic ecosystems; geologic structures, exposures and landforms that record active geologic processes, or portions of earth history; and fossil evidence of biological evolution.

When evaluating national significance in congressionally authorized Special Resource Studies, resources that have been designated as NHLs or NNLs are considered to already have been determined to be nationally significant and require no further analysis.

Resources associated with the S.U.M. within the Great Falls Historic District, established by P.L. 104-333, have been designated by the Secretary of Interior as nationally significant for reasons identified in their specific NHL and NNL designations. The district, therefore, meets the criterion for national significance. It must be noted that, during the course of this study, numerous scholars, authors and other knowledgeable persons have confirmed the importance of the events and resources associated with the Great Falls Historic District. The study team also confirmed that



the resources of the district largely retain integrity.

Suitability Analysis of the Great Falls Historic District

NPS Management Policies provide that 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 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 system, but extends the analysis to similar resources protected by other public entities and the private sector. Adequacy of representation is determined on a case-by-case basis by comparing the potential area to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values.

The comparative analysis also addresses rarity of the 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 natural resources, a comparison is made to other similar types of resources represented in the national park system or protected by other public or private entities.

The Great Falls of the Passaic – The Natural Feature

The Great Falls, 77 feet in height, is the second largest waterfall (in width and volume, not height) in the United States, east of the Mississippi River. The American Falls at Niagara Falls, by comparison, is the largest in width and volume in the United States and 176 feet in height.

The Great Falls were formed approximately 13,000 years ago during the end of the last ice age. As the glacier receded, Glacial Lake Passaic was formed behind the Watchung Mountains. The Falls were carved through the underlying, approximately 200 million year old, basalt.

Waterfalls are well represented in many state parks and in units of the national park system and other federal lands throughout the nation. A number of these and their associated rivers have provided power sources for historic and present industrial uses.

The American Falls, linked to a major historic and present power source in New York State, are a part of the Niagara Reservation NHL and administered by the State of New York's Office of Parks, Recreation and Historic Preservation (OPRHP) as Niagara Falls State Park, along with a number of companion state parks along the Niagara River and Gorge. OPRHP also

administers Taughannock Falls State Park, site of a 215 foot waterfall, and Letchworth State Park, among others.

The High Falls in downtown Rochester is part of a state sponsored heritage area and an urban cultural park celebrating Rochester's industrial past. Rochester's Heritage Area focuses on High Falls, a revitalized complex of mills, factories and archaeological sites adjacent to the Genesee River. Lowell National Historical Park also interprets the use of water power along falls on the Merrimack River.

The NPS has recently completed a congressionally authorized National Heritage Area (NHA) Feasibility Study to determine if a potential Niagara Falls NHA met criteria for congressional designation. The study determined that the study area, which included the American Falls and communities along the Niagara Gorge to Lake Ontario, qualified for congressional designation as a NHA. The preferred alternative in the study includes the establishment of a limited term Federal Commission to undertake a heritage area plan for the NHA, later to be succeeded by a non-federal management entity after five years.

An earlier reconnaissance analysis performed by the NPS determined that the Niagara Falls State Park would not meet criteria for designation as a unit of the national park system because it was already protected by the State of New York and there was no need for NPS management.

One of the themes of the potential heritage area detailed in the study is the history of water power in the region. Legislation to designate a Niagara Falls National Heritage has recently been introduced in Congress.

Numerous state parks throughout the nation feature waterfalls as scenic and recreational attractions. The Great Falls, itself, is now part of the New Jersey State Park System. A sampling of other protected resources include Amicalola Falls State Park in Georgia, Silver Falls State Park in Oregon, Falls Creek and Caesar's Head State Parks in South Carolina, Ricketts Glen State Park in Pennsylvania, and Blackwater Falls State Park in West Virginia, among many others.

Units of the national park system and other federal lands also contain a myriad of waterfall attractions. Some of the nation's most majestic falls can be found at Yellowstone, Yosemite (with Yosemite Falls, the highest in the US dropping vertically 2425 feet, Sentinel at 2,000 feet, and Silver Strand at 1,182 feet), the Great Smokies, Grand Teton, Grand Canyon, Mt. Rainier, and Shenandoah, among others.

Crabtree Falls at George Washington National Forest in Virginia cascade 1200 feet to its base. In the U.S Forest Service-administered Columbia River Gorge National Scenic Area, Multnomah Falls is one the nation's highest year-round, non cascading waterfalls at 620 feet.

It is the conclusion of this analysis that the Great Falls, as the primary natural feature of the Great Falls Historic District, and its use for industrial water power, does not meet the suitability analysis for potential inclusion in the national park system. Numerous waterfall resources, including those historically used for water power and possessing scenic or recreational values, are already adequately represented in the national park system or protected by other federal and state governmental entities.

The Great Falls Historic District – Cultural Resources

In evaluating the suitability of cultural resources within or outside the NPS, the Service uses its “Thematic Framework” 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. Through eight concepts that encompass the multi-faceted and interrelated nature of human experience, the thematic framework reflects an interdisciplinary, less compartmentalized approach to American history. 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

The three thematic concepts applicable to the Great Falls are peopling places, expanding science and technology, and developing the American economy.

Peopling Places

This theme examines human population movement and change through prehistoric and historic times. It also looks at family formation, at different concepts of gender,

family, and sexual division of labor, and at how they have been expressed in the American past.

The theme includes such topics as family and the life cycle; health, nutrition, and disease; migration from outside and within; community and neighborhood; ethnic homelands; encounters, conflicts, and colonization. For the purposes of this study, the topic of migration from outside and within is most appropriate. The area of significance for this study is immigration.

Paterson’s industries in the Great Falls Historic District benefited from immigrant labor during much of its productive period. Indeed, it was a stated purpose of Alexander Hamilton, when the City was founded, to attract immigrant labor to this planned industrial city.

During the 19th and early 20th centuries, the labor force particularly comprised succeeding waves of English, Irish, German, Polish, Jewish, and Italian immigrants. In the 1830s almost 50% of Paterson’s population was Irish, most settling near the mills of the Great Falls in an area known as “Dublin.” In 1860, the Irish still comprised 40% of the population. They became a political force in the City and gerrymandering was frequently used in the last quarter of the 19th century to circumvent their growing power.

As the 20th century arrived, Italian immigrants located within the same area. Germans and Poles worked in the mills including many Jewish immigrants. Some were able to ultimately establish their own mills and advance economically as owners.

Working long hours and under harsh conditions by today’s standards, immigrant



workers, both skilled and unskilled, were the backbone of Paterson's early and growing industrial might, particularly in its textile, locomotive and silk factories. The City, today, continues its tradition as a location for recent immigrants including Hispanic, Latino and Middle Eastern populations.

Immigration resources and themes are well represented in the national park system and sites associated with immigration are also protected by other entities. Example sites include:

1. Castle Clinton National Monument, New York—Constructed as a fort to defend New York Harbor between 1808 and 1811, Castle Clinton became a major immigration receiving station. Over 8 million people entered the United States through what was then known as Castle Garden between August 3, 1855 and April 18, 1890 when it was closed. The site was later reopened as the New York City Aquarium. Programs and tours trace the history of the fort from its defensive role and its changing uses as a theatre, immigration station, and aquarium.

2. Statue of Liberty National Monument and Ellis Island, New York and New Jersey—A gift from the people of France dedicated on October 28, 1886, the Statue of Liberty became a beacon for millions of immigrants to our nation's shores. The monument includes Ellis Island, which became the entry point for over 12 million persons between 1892 to 1954. It is the nation's premier site for interpreting the American immigration experience as a point of entry.



Lowell's mile of mills as seen from across the Merrimack River, Lowell, MA. NPS photo.

3. Lowell National Historical Park, Massachusetts—Located in Lowell, the park interprets the American Industrial Revolution and the experiences of immigrant workers. The Boott Cotton Mills Museum with its operating weave room of 88 power looms, "mill girl" boardinghouses, the Suffolk Mill Turbine Exhibit and guided tours tell the story of the transition from farm to factory, chronicle immigrant and labor history and trace industrial technology. The park includes mills, worker housing, 5.6 miles of canals, and 19th-century commercial buildings.

4. Lower East Side Tenement National Historic Site, New York—an Affiliated Area of the national park system, the tenement building at 97 Orchard Street is located in the Lower East Side of New York City. The site interprets the immigrant experience and includes restored apartments of actual residents, as well as offering educational programs on historical and contemporary immigration. The site is owned and managed by the Lower East Side Tenement Museum, Inc.

5. Angel Island State Park, California—A NHL, between 1910 and 1940, Angel Island served as a U.S. immigration station in California. Approximately 1 million persons were processed through the facility. Angel Island represents the impact of the Chinese Exclusion Act which restricted the immigration of Chinese laborers and prohibited U.S. citizenship to Chinese immigrants already in this country. Acting as a detention center, approximately 250,000 Chinese and 150,000 Japanese immigrants were detained at the site.

6. Ybor City Museum State Park, Florida—A NHL, Ybor City Museum State Park provides visitors a glimpse into the lives of the immigrants who settled, lived in, and built the thriving community of Ybor City in Tampa Florida. The museum park traces the rich cultural history of Ybor City and the cigar making industry. Spaniards, Italians, Germans, Jews, Cubans, and Afro-Cubans called Ybor City home, establishing their own newspapers, restaurants, social clubs, mutual aid societies and hospitals. The site is a unit of the State of Florida Park System.

Congressionally designated National Heritage Areas provide additional protection and interpretation of resources related to immigration. A few examples include:

1. Essex National Heritage Area, Massachusetts—Essex comprises approximately 500 square miles in eastern Massachusetts. Three theme trails (Early Settlement, Maritime, and Industrial) permit visitors to explore the region's resources from many historical perspectives. A number of sites within the heritage area interpret immigration in association with the Industrial Theme Trail.

2. John H. Chafee Blackstone River Valley National Heritage Corridor, Massachusetts and Rhode Island—Blackstone interprets the rich American industrial revolution heritage of the Blackstone River Valley in Massachusetts and Rhode Island. Immigration resources, themes and stories are central to its interpretation of industry and workers.

3. Keweenaw National Historical Park, Michigan—The park is made up of nationally significant sites affiliated with historical copper mining on Michigan's Keweenaw Peninsula. In addition to the park's Calumet and Quincy units, the National Park Service also works with partners known as "Keweenaw Heritage Sites," which assist in preserving and telling the story of the hard-rock copper mining industry in the Keweenaw region. Keweenaw National Historical Park, along with the heritage sites, interpret immigrant life and contributions that relate the story of copper on the Keweenaw Peninsula.

4. Lackawanna Valley National Heritage Area, Pennsylvania—Coal mining, railroading and railroad building, steel, food processing, large-scale fabrication, printing, textiles, trolleys, and mass education were all industries in the Lackawanna Valley in eastern Pennsylvania. The region became a magnet for new immigrants between 1860 and 1910. Resources in the heritage area interpret immigrant worker contributions to the region's coal mining and industrial past.

5. Rivers of Steel National Heritage Area, Pennsylvania—Rivers of Steel in western Pennsylvania is devoted to telling the story of the legacy of "Big Steel" and the many immigrants who flocked to the region in the 19th and 20th centuries to labor in the mills.

A number of museums also interpret the immigrant experience in the United States. The Dreams of Freedom Immigration Museum in Boston (MA) provides living history and interpretation of that City's immigrant stories. At the Johnstown (PA) Heritage Discovery Center's *America: Through Immigrant Eyes*, visitors take an active assigned role and experience the daily life of their immigrant character as they tour exhibits.

Some museums are dedicated to specific immigrant groups such as the Danish Immigrant Museum in Elk Horn, Iowa and the Scandinavian Heritage Museum in Seattle, Washington. The Museum of Work and Culture in Woonsocket, Rhode Island—part of the Blackstone River Valley NHA—interprets the compelling stories of French Canadian immigrants seeking economic improvement in the mill towns along the Blackstone River.

Conclusion

While the Great Falls Historic District has many resources and rich stories relating to the theme of immigration in the U.S., it does not appear to have particularly unique resources or stories when compared to those already represented in the national park system, or protected and interpreted by other public and private entities.

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. Technology is the application of human ingenuity to modification of the environment in both modern and traditional cultures, and includes topics such as experimentation and invention, and technological applications. The areas of significance for this study are engineering and technology.

Paterson's Great Falls Historic District was the scene of significant technological advances in industrial processes and engineering advancements in the use of water power for industry and, later, electrical generation. The first signature project of the SUM was its ambitious endeavor to provide for the design and construction of a system for industrial water power, drawing water from the Passaic River and diverting it by gravity through raceways to manufacturing sites – a task initially assigned to Pierre Charles L'Enfant. The establishment of the system, as an early water power system, is a primary reason for the NHL designation of the Historic District.

Technological innovations were evident in many of Paterson's industrial enterprises from the invention and production of Colt's first revolver and the fitting of an engine to Holland's first submarine, to innovations by locomotive manufacturers, and those affecting the Paterson textile silk trade. Like most cities in the Northeast and those in New Jersey, Paterson had its own manufacturing specialties in the industrial milieu of the 19th and 20th

centuries. In the emerging competitive climate of manufacturing, advancements in technology were often among the keys to success. This analysis has purposely focused on resources comparable to those represented in the Great Falls Historic District and is not meant to be an exhaustive analysis of all sites representing the theme.

Resources interpreting the themes of engineering and technology are well represented in the national park system or protected by other public and private entities. Sites interpret the use of waterpower from its simplest forms to large hydroelectric systems. Examples of sites for waterpower include:

1. Lowell National Historical Park, Massachusetts—Lowell was dependent on waterpower for its continuing industrial success. Its system of canals provided power to mills and evolved from 1821 to the 1850s configuration that is still visible today. Lowell NHP contains significant waterpower resources and interprets waterpower and its industrial applications in its programs and exhibits. In the first turbines designed by Uriah Boyden and adapted by James B. Francis to power Lowell's mills, the water entered the wheel at its center and was directed outward by stationary vanes to turn another set of moving vanes. By 1858, 56 Boyden turbines, rated at 35 to 650 horsepower, helped drive Lowell's mills. In both the waterwheel and turbine, the power was transferred by gears to the mill's main power shaft or drive pulley.

2. Saugus Ironworks National Historic Site, Massachusetts—Saugus is the site of the first integrated ironworks in North America, 1646-1668. The park interprets the critical role of iron making to seventeenth-century settlement

and its legacy in shaping the early history of the nation. The site features an open-air museum with working waterwheels to demonstrate early waterpower techniques.

3. John H. Chafee Blackstone River Valley National Heritage Corridor, Massachusetts and Rhode Island—Blackstone interprets waterpower as part of its story of the industrial revolution in America. The Blackstone River provided the waterpower for the birth of industry in America with its 438-foot drop over a 46-mile length. Structures related to waterpower and early transportation - dams, ponds, mills, canals, locks and the related mill villages, towns and cities are all integral parts of the Blackstone Valley riverscape. The Blackstone was harnessed for waterpower to fuel textile mills beginning in 1790 in a cotton mill (Slater's Mill) in Pawtucket, Rhode Island.

4. Gilbert Stuart Birthplace, Rhode Island—A NHL, this site interprets the 18th century waterpower used for the grist and snuff mills that were typical of small systems. Established by Stuart's father, the snuff mill was the first powered by water in the colonies.

5. Tennessee Valley Authority, Tennessee—The TVA is a major electrical power generator and interprets hydroelectric power in its visitor centers located throughout the Tennessee Valley.

6. Hoover Dam, Nevada and Arizona—A NHL, administered by the Department of the Interior's Bureau of Reclamation. The Dam is a National Historic Landmark and has been rated by the American Society of Civil Engineers as one of America's Seven Modern Civil Engineering Wonders. The Bureau

interprets hydroelectric power at its Tour Center and conducts tours of the facility.

7. Augusta Canal National Heritage Area, Georgia—Built in 1845 as a source of power, water and transportation, the Augusta Canal was one of the few successful industrial canals in the American South. Spearheaded by native Augustan Henry H. Cumming, who perceived that Augusta could one day become “the Lowell of the South,” the Augusta Canal began to fulfill Cumming’s vision in short order. By 1847 the first factories - a saw and grist mill and the Augusta Factory were built, the first of many that would eventually line the Canal.

8. Folsom Powerhouse, California—A NHL, this hydroelectric generating plant sent high-voltage alternating current over long-distance lines for the first time in 1895, a major advance in the technology of electric power transmission and generation.

9. Niagara Power Project Power Vista, New York—Operated by the New York Power Authority, the facility interprets hydroelectric power associated with Niagara Falls and the historical role of hydroelectricity in the Niagara Frontier.

10. Adams Power Plant Transformer House, New York—A NHL, until well into the 20th century, this electric-power generating facility retained its position as the largest hydroelectric power plant in the world. The transformer house, built in 1895 from designs by McKim, Mead and White, is the only surviving structure of the plant, which has been hailed as “the birthplace of the modern hydroelectric power station.” When it became operational, long-distance commercial electrical transmission became a reality. The plant does

not currently enjoy the same level of protection as other resources, but is within the area proposed as the Niagara Falls National Heritage Area.

Example sites for technology and engineering include:

1. Edison National Historical Site, New Jersey—For more than forty years, the laboratory created by Thomas Alva Edison in West Orange, New Jersey, had enormous impact on the lives of millions of people worldwide. Out of the West Orange laboratories came the motion picture camera, vastly improved phonographs, sound recordings, silent and sound movies and the nickel-iron alkaline electric storage battery. Edison National Historic Site provides a unique opportunity to interpret and experience important aspects of America’s industrial, social and economic past, and to learn from the legacy of the world’s best known inventor.

2. Golden Spike National Historic Site, Utah—The site commemorates the completion of the world’s first transcontinental railroad which was celebrated where the Central Pacific and Union Pacific Railroads met on May 10, 1869. Its paramount purpose is to illustrate the social, economic, and political impacts of the transcontinental railroad on the growth and westward development of the United States. One of the two locomotives present when the last spike was driven, was Rogers Locomotive Works’ locomotive # 119, manufactured in Paterson, NJ.

3. Lowell National Historical Park, Massachusetts—As part of the history told at Lowell are the technological advancements of textile and other manufactures that were instrumental in the success of the early American Industrial Revolution.

4. Saugus Iron Works National Historic Site, Massachusetts—Saugus is the site of the first integrated ironworks in North America, 1646-1668. Resources interpreted at the site demonstrate seventeenth-century engineering and design methods, and iron-making technology and operations.

5. Springfield Armory National Historic Site, Massachusetts—Begun as a major arsenal under the authority of General George Washington early in the Revolutionary War, the first national armory began manufacturing muskets in 1794. Within decades, Springfield Armory had perfected pioneering manufacturing methods that were critical to American industrialization. The site interprets the technological evolution of arms manufacturing during its long history of production.



Springfield Armory National Historic Site. NPS photo.

6. Hopewell Furnace National Historic Site, Pennsylvania—The site is one of the finest examples of a rural American 19th century iron plantation. It interprets iron-making

technology, business operations and village life of the early iron-making period.

7. Harpers Ferry National Historical Park, West Virginia—In 1819, John H. Hall, a New England gunmaker, signed a contract with the War Department to produce 1,000 breechloading rifles – a weapon he had designed and patented in 1811. Under the terms of the contract, Hall came to Harpers Ferry where he occupied an old Armory sawmill along the Shenandoah River. The site soon became known as Hall's Rifle Works, and the small island on which it stood was called Lower Hall Island. Hall spent several years tooling new workshops and perfecting precision machinery for producing rifles with interchangeable parts – a boldly ambitious technological goal for an industry which was traditionally based on the manual labor of skilled craftsmen.

8. Steamtown National Historic Site, Pennsylvania—Steamtown was established to further public understanding and appreciation of the role steam railroading played in the development of the United States. The site provides displays and interpretation of locomotive construction and technology.

9. Southern Museum of Civil War and Locomotive History, Georgia—Located in Kennesaw, and a member of the Smithsonian Institution Affiliations Program, the museum contains a reproduction of the Glover Machine Works and features the only restored belt-driven locomotive assembly line in the country, original machining equipment, and two restored Glover locomotives in various stages of assembly. An interactive presentation detailing the train building process, from metallurgy and patterns to casting and construction helps

visitors experience life as a factory worker, while detailed company records provide insight into the management of the Glover Machine Works. The site is also the location of one the Rogers' Locomotive Works most famous locomotives, "The General," which was built in Paterson in 1855.

11. John H. Chafee Blackstone River Valley National Heritage Corridor, Massachusetts and Rhode Island—As part of the history and interpretation offered through resources of the heritage area, many technological innovations are examined that were associated with the American Industrial Revolution including the first successful cotton mill.

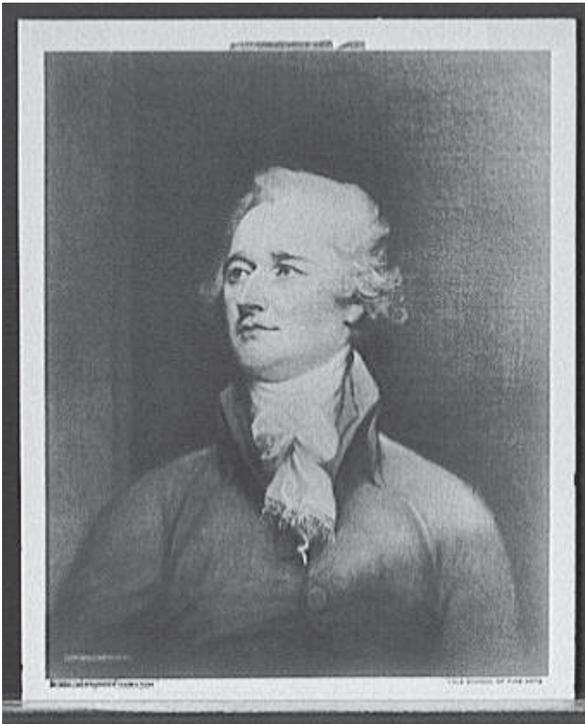
12. U.S. Submarine Force Museum, Connecticut—The Submarine Force Museum, located on the Thames River in Groton, maintains the world's finest collection of submarine artifacts. It is the only submarine museum operated by the United States Navy, and as such is the primary repository for artifacts, documents and photographs relating to U.S. Submarine Force history. The museum traces the technology and development of submarines from David Bushnell's Turtle, used in the Revolutionary War, to the modern Los Angeles, Ohio, Seawolf and Virginia class submarines.

13. Erie Canalway National Heritage Corridor, New York—The Erie Canalway NHC preserves associated resources and interprets the construction and operation of one of the nation's foremost engineering

projects. In the early 19th century, this waterway opened the "Old Northwest" to settlement and gave Western agriculture access to Eastern markets. A remarkable engineering feat for the period, it helped to make New York City one of the most important trade centers in the world.

Conclusion

While the Great Falls Historic District has many resources relating to the thematic concept of Expanding Science and Technology, it does not appear to have particularly unique resources when compared to those already represented in the national park system or protected and interpreted by other public and private entities.



Alexander Hamilton by John Trumbull. Library of Congress, Prints and Photographs Division, Detroit Publishing Company Collection.

Alexander Hamilton and 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 themes are commonly applicable to

historic industrial districts such as the Great Falls Historic District. The areas of significance are industry and labor.

Because Paterson proudly traces its history as a manufacturing center to Alexander Hamilton and the creation of the S.U.M., it is important for this Special Resource Study to address the question of Alexander Hamilton's overall contributions to the nation, and the role that the experiment he nurtured at the Great Falls played in the larger scheme of his life and those many contributions.

While there is no question that Hamilton viewed the manufacturing promise of Paterson, the Great Falls and the S.U.M., as a vehicle to implement his strong beliefs in an industrially-based United States, the fact of the matter is that the Paterson venture, as envisioned, failed early-on due to the major weaknesses of its governor/director participants. The S.U.M. did not become the manufacturing colossus Hamilton envisioned; rather, it became primarily a real estate venture, ultimately providing land and water power for manufacturing enterprises below the falls.

Hamilton's vision of an industrial society was achieved in the United States, and in Paterson, but after the early decline of the S.U.M., more quickly and wide-spread in places like Lowell and Waltham, Massachusetts and other New England cities that were built on the firm stepping stones of less grandly conceived endeavors.

Hamilton's life is one that continues to impact our nation. While known for his writings and interest in manufactures, particularly his report to Congress on that subject which followed soon after the establishment of the S.U.M.,

Hamilton provided much more that shaped the nation and our society. Indeed, his *Report on Manufactures* was not well received by Congress at the time, nor acted upon, despite its ultimate realization.

Hamilton was a close and trusted associate of General George Washington, serving on his staff for most of the Revolution. He fought at White Plains, Trenton, Princeton, Monmouth and Yorktown. He was instrumental in the establishment of and served as delegate to the Constitutional Convention and was a principle author of the Federalist Papers, a still enduring source on the meaning of the United States Constitution. Hamilton served as the first Secretary of the Treasury and became one of America's great early statesmen. He initiated the First Bank of the United States, and established the Revenue Cutter Service, the forerunner of the U.S. Coast Guard.

Hamilton is regarded as "The Father" of the U.S. Coast Guard and was instrumental in the establishment of the U.S. Navy. His *Report on Public Credit* was a major milestone in American financial history. Hamilton established the foundations for American capitalism and commodity and stock exchanges. He was responsible for the establishment of the first political party. He stood as a national founder who believed in strong central government, national defense, assistance to business and industry, national debt financing and a strong national banking system. Many of the issues he addressed are as relevant to Americans today, as they were during his time of life; only the scale, perhaps, is different.

While Hamilton's association with the founding of Paterson is important to the City

and its history and is part of the reason for the district's designation as a NHL, there are no resources at Great Falls save the falls and the S.U.M. constructed water raceways that reflect the period of his association. Paterson represented his vision of industrial progress in 1791, but the vision in this one place was quickly dashed by the financial adventures of William Duer and others. Hamilton's vision was ultimately achieved in Paterson, but through a lengthy application of entrepreneurial skills of many individual manufacturers, not the single manufacturing entity he originally conceived. That phenomenon occurred in other locations all over the Northeast and the nation at the same time.

Authors Stanley Elkins and Erik McKittrick in their book chronicling the Federal Period provide a comparative perspective of the S.U.M. They write:

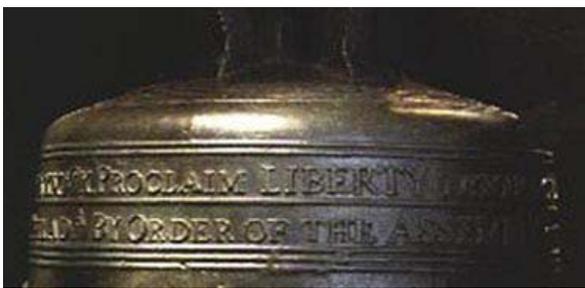
When the directors in 1796 voted to shut down altogether to avoid 'evident loss,' they were putting a period to some four years of amateurism, cross purposes, and divided attention. Not until the 1820s and '30s with the activities of the Boston Associates would something like Hamilton envisioned come into being. The foundation of Lowell, Chicopee, and Holyoke during that period would be the fruit of careful planning and two decades of prior technological experience in small mills all over New England. (Elkins and McKittrick, p. 280)

Alexander Hamilton, the person, is not as well represented in the national park system as his significant contributions to American history deserve, but it is largely through a failure of the Service to fully interpret his recognized achievements, not a lack of places associated

with those contributions. One unit, Hamilton Grange, is fully dedicated to Hamilton, while another has strong associations with his major accomplishments. Increased interpretation of Hamilton's life and legacy by the NPS would improve public knowledge and appreciation of this important American figure. The following are units of the national park system associated with Alexander Hamilton:

1. Hamilton Grange National Memorial, New York—The memorial preserves the New York City home of Alexander and Elizabeth Hamilton, completed in 1802. Named “The Grange” after the Hamilton family’s ancestral home in Scotland, it served as his home for only two years before his death in 1804. The home was designed by architect John McComb Jr.

2. Independence National Historical Park, Pennsylvania—Independence NHP in Philadelphia is the site of Independence Hall where both the Declaration of Independence and the U.S. Constitution were created. A dedicated nationalist from the start, it was Hamilton who orchestrated the groundswell for a Constitutional Convention. Hamilton participated as a member of the Congress as the Constitution was drafted and participated in congressional deliberations on the matter. His role in authoring many of the Federalist



Liberty Bell, Independence National Historical Park. NPS photo.



First Bank of the United States, Philadelphia. NPS photo.

Papers was instrumental in gaining its ratification.

The First Bank of the United States is also located at Independence National Historical Park. The establishment of the bank provoked the first great debate over strict, as opposed to an expansive interpretation of the Constitution. In adopting Hamilton's proposal and chartering the bank, both the Congress and the President took the necessary first steps toward implementing a sound fiscal policy that would eventually ensure the survival of the new federal government and the continued growth and prosperity of the United States.

3. Federal Hall National Memorial, New York—While constructed after the period of Washington's inauguration in New York City at that location and Hamilton's appointment as Secretary of the Treasury, the unit indirectly is associated. It overlooks the New York Stock Exchange, the icon of U.S. financial power that Hamilton helped to create.

Other resources which relate to Hamilton include:

1. **The National Constitution Center, Pennsylvania**—Located in Philadelphia, the Center conducts programs and exhibits dedicated to increasing public understanding of, and appreciation for, the Constitution, its history, and its contemporary relevance. Hamilton is depicted in its exhibit on Founding Fathers.
2. **Schuyler Mansion State Historic Site, New York**—A NHL, an elegant Georgian style mansion, was the home of Phillip Schuyler, Hamilton's father-in-law. It was the site of Hamilton's marriage to Elizabeth Schuyler in 1780. The site is administered by the New York State Office of Parks, Recreation and Historic Preservation.
3. **Hamilton Hall, Massachusetts**—A NHL located in Salem, the Hall was established when political differences between Federalists and Republicans split the Salem Assemblies in 1805. The Federalists erected this three-story brick building to house their social activities. It is a distinguished example of a Federalist-Adamesque public building.
4. **Alexander Hamilton's Memorial and Tomb, New York**—Located at Trinity Church Yard in New York City, the site is the burial plot of Alexander Hamilton.

Sites reflecting the theme of Developing the American Economy in the area of industry which relate to similar resources of Paterson include:

1. **John H. Chafee Blackstone River Valley National Heritage Corridor, Massachusetts and Rhode Island**—The Blackstone River Valley of Massachusetts and Rhode Island is popularly described as the “Birthplace of the American Industrial Revolution,” the place where America made the transformation from farm to factory. America's first successful textile mill, Slaters Mill, could have been built along practically any river on the eastern seaboard, but in 1790 the forces of capital, ingenuity, mechanical know-how and skilled labor came together at Pawtucket, Rhode Island where the Blackstone River provided the power that kicked off America's drive to industrialization. The mills and factories of the Blackstone Valley served as the cornerstone of America's industrial growth.

2. **Lowell National Historical Park, Massachusetts**—Lowell interprets the rise of industry during the American Industrial Revolution. While it was a center for textile manufacturing, Lowell grew into the location for many other industrial pursuits. Foremost were textile machinery firms established to meet the demands of textile manufacturers throughout New England. The Lowell Machine Shop and the Kitson Machine Company were the largest of these companies, but there were many others.

The Lowell Machine Shop did not limit itself to textile machinery, producing steam locomotives for New England's expanding rail network. Other textile-related firms manufactured and distributed a broad array of mill fixtures, tools, and textile machine parts. New entrepreneurs built companies unconnected with textiles. Firms established to

supply an expanding national market for patent medicines grew into a major Lowell industry. The Hood and Ayer companies and Father John's Medicine were prominent in this field, pioneering in the skillful use of mass-market advertising.

The city's economic base grew more and more diversified: shoe factories, boilerworks, scalmakers, and a brewery. During World War I, munitions manufacturers prospered, and the United States Cartridge Company, founded shortly after the Civil War by well known politician and General Benjamin Butler was one of the leading employers in the city.

3. Springfield Armory National Historic Site, Massachusetts—The Armory produced firearms between 1777 and 1968. It was responsible for many innovations in arms design and production including the use of interchangeable parts and precision manufacturing. In 1891 it became the Army's main center for developing and testing small arms.

4. Harpers Ferry National Historic Site, West Virginia—The United States Army and Arsenal, established here in 1799, transformed Harpers Ferry from a remote village into an industrial center. Between 1801 and the outbreak of the Civil War in 1861, the Armory produced more than 600,000 muskets, rifles, and pistols, and employed, at times, over 400 workers. Inventor John H. Hall pioneered interchangeable firearms manufacture at his Rifle Works between 1820-1840, and helped lead the change from craft-based production to manufacture by machine.

Hall, a native of Portland, Maine, devoted his uncompromising attention to the “uniformity

principle” of interchangeable manufacture at the Harpers Ferry Armory. The “uniformity principle,” referred to as “the American system of manufactures” by the British, made use of special-purpose machines to produce parts so accurately sized that they were interchangeable. Hall pioneered mechanized arms production and the manufacture of interchangeable firearm components, laying a solid foundation for America's emerging factory system.



Steamtown National Historic Site, Gouldsboro, PA. Canadian National 3254 pulls a passenger train past Snag Pond in Gouldsboro, PA. Steamtown operates many excursions into the Pocono Mountains along this route. NPS photo, Ken Ganz.

5. Boston National Historical Park, Massachusetts—The park includes portions of the Charlestown Navy Yard. Established in 1800, the Yard served as a ship building and repair center until 1974. The men and women of its workforce built more than 200 warships and maintained and repaired thousands. From its inception the yard was in the forefront of shipyard technology, from building the Navy's only ropewalk, supplying the Navy with most of its rope supplies, to making itself a center of missile and electronics conversions.

6. Steamtown National Historic Site, Pennsylvania—Steamtown was established to further public understanding and appreciation of the role steam railroading played in the development of the United States. The site provides extensive displays and interpretation of locomotive construction and technology.

7. National Heritage Areas—Besides Blackstone, many of the congressionally designated heritage areas focus on industrial heritage throughout the United States. A listing of national heritage areas protecting and interpreting historic industrial resources include: Augusta Canal NHA, Automobile NHA, Essex NHA, Hudson River Valley NHA, Lackawanna Valley NHA, National Aviation NHA, National Coal Heritage, Oil Region NHA, Rivers of Steel NHA, Schuylkill River NHA, Southwestern Pennsylvania Industrial Heritage, and Wheeling NHA.

8. Cheney Brothers Historic District, Connecticut—A NHL, this 175-acre milling community in South Manchester, Connecticut commemorates and interprets the Cheney family's silk manufacturing enterprises. With over 200 mill buildings, worker houses, churches, schools, and the Cheney family mansion, this is an excellently preserved example of a 19th to early 20th century paternalistic mill town. Established originally in 1838 as the Mount Nebo Silk Company, Cheney Brothers became the single largest and most profitable silk producer in the nation by the late 1880s.

9. Armsmear and Coltsville, Connecticut—Armsmear, a NHL, was the home of arms manufacturers Samuel and Elizabeth Colt in Hartford, Connecticut. Coltsville, the Colt manufacturing complex in Hartford

Connecticut is presently the subject of a NHL nomination pending before the National Park System Advisory Board. Coltsville is the location of Samuel Colt's arms factory which was managed by his wife after Colt died. Colt moved to Hartford after his Paterson factory failed. The buildings associated with Coltsville maintain high degrees of integrity. The site is the subject of a Special Resource Study currently being conducted by the NPS to determine if it meets criteria for designation as a unit of the national park system.

10. Southern Museum of Civil War and Locomotive History, Georgia—The museum contains a reproduction of the Glover Machine Works, featuring the only restored belt-driven locomotive assembly line in the country, original machining equipment, and two restored Glover locomotives in various stages of assembly. An interactive presentation detailing the train building process, from metallurgy and patterns to casting and construction. The site is the location of one the Rogers' Locomotive Works most famous locomotives, "The General," which was built in Paterson in 1855. The General was popularized in the Civil War episode known as "The Great Chase."

11. Railroad Museum of Pennsylvania—One of the leading sites devoted to railroading, the museum also includes papers, manuals, records, blueprints, and diagrams of the Baldwin Locomotive Works of Philadelphia from the Matthew Gray Collection, the Charles Scott Collection and the Frank Moore Collection. Baldwin was the nation's largest locomotive manufacturer.

12. Pullman Historic District, Illinois—A NHL, constructed between 1880 and 1884 for engineer and industrialist George M. Pullman

(1831-1897). Pullman was a completely planned model industrial town. It represents a dramatic and pioneering departure from the unhealthy, over-crowded makeshift and unsanitary living conditions found in working-class districts in other 19th century industrial cities and town. In 1894, it was the focus of a bloody and violent strike which spread nationwide over the railroad networks, prompting President Grover Cleveland to intervene with Federal troops and resulted in the first use of the Sherman Anti-Trust Act to smash the unions.

13. Boston Manufacturing Company, Massachusetts—A NHL in Waltham, this manufacturing complex represents the first truly modern factory in the U.S. Employing innovative power looms, it signaled the birth of American industrialization and ended U.S. dependency on British technology. It was the technological basis for a fundamental reorganization of the factory system.

14. Harrisville Historic District, New Hampshire—This NHL provides an unrivaled glimpse into the life of an early 19th century New England mill town. A center for the manufacture of woolen goods since 1799, the town has maintained mills, stores, boarding houses, dwellings, and churches that reflect the myriad levels of society.

15. Harmony Mills, New York—A NHL, located in Cohoes the Harmony Mills Company was one of the largest American producers of cotton fabric for printed calicoes and fine cotton muslins from the late 1860s through the 1880s. Harmony Mill No. 3 was the largest individual cotton factory in the world when it was completed in 1872, and was acknowledged as representing the state of the

art at that time. The Harmony Mills district has been described as “one of the finest examples of a large-scale textile mill complex outside of New England.”

16. Clark Thread Company Historic District, New Jersey—A NHL, with over 35 buildings on approximately 13 acres of land, this district incorporates most of the extant factory buildings of the Clark Thread Company in East Newark, New Jersey, the world’s foremost maker of cotton thread in the late 19th to early 20th century. This NHL does not currently enjoy the same level of protection as other resources cited above.

Sites reflecting the theme of Developing the American Economy in the area of labor which relate to similar resources and events of Paterson include:

1. Botto House, New Jersey—a NHL, located in Haledon, New Jersey, the site was the home of Maria and Pietro Botto, immigrant silk workers from northern Italy. The house played a major role in the reform of the American workplace. During the Paterson Silk Strike of 1913, it served as a rallying point for thousands of striking workers and their families who advocated the eight-hour day and an end to child labor. The site is operated by the American Labor Museum and interprets historical labor unrest in Paterson.

2. Kate Mullany National Historic Site, New York—An Affiliated Area of the national park system, the site was the home of Kate Mullany, who organized and led Troy’s all-female Collar Laundry Union in the 1860s, and was America’s most prominent female labor leader. Male unionists recognized her group as the only bona fide female union in the country,

and applauded her success in bargaining with laundry owners for her objectives. Mullany and her colleagues also supported other working unions and labor activity.

3. Bost Building, Pennsylvania—A NHL, located in Homestead, Pennsylvania, the site is part of the Rivers of Steel National Heritage Area. Between June 29 and November 21, 1892, much of the nation followed the events of a labor strike outside Pittsburgh, Pennsylvania, that pitted the Carnegie Steel Company against one of the strongest labor unions at the time. During the strike at the Homestead Steel Works, known as “The Homestead Lockout,” the Bost Building served as the local headquarters for the Amalgamated Association of Iron and Steel Workers and as the base for American and British newspaper correspondents reporting the events. The confrontation turned bloody when Pinkerton guards approached Homestead on barges in a failed attempt to reclaim the Steel Works from the striking workers and their supporters. It took the Pennsylvania Militia to restore order. The Bost Building is the best surviving structure associated with this important strike. The building serves as the primary visitor center for the heritage area.

4. Matewan Historic District, West Virginia—A NHL, the District is exceptionally significant in the history of labor organization in America. It was the scene of the “Matewan Battle” of May 19, 1920 where coal company officials tried to remove union workers from company housing. The conflict was precipitated by striking coal miners who demanded the company recognize the legitimacy of the United Mine Workers of America. The coal companies retaliated by bringing in armed guards to evict miners from

local mines and their families from company housing. The ensuing conflict left ten people dead. The episode was a pivotal event in the eventual end of coal company control in West Virginia. The site is part of the National Coal Heritage Area.

5. Socialist Labor Party Hall, Vermont—a NHL, located in Barre, the Hall is significant for its association with socialist and anarchist politics, labor organizations, and Italian immigrant heritage in the early 20th century. The Hall played a central role in the history of Italian anarchism and militant unionism in the United States, and was the leading place where debates took place among anarchists, socialists, and union leaders over the future direction of the labor movement in America. The Socialist Labor Party Hall, as the primary site for these discussions, embodies the radical heritage and the strength of the union movement during the early 20th century. The site is managed by the Barre Historical Society.

6. Pullman Historic District, Illinois—a NHL, the district is associated with the major railway strike known as, “Debs Rebellion” after one of its leaders, Eugene Debs. In 1894, it was the focus of the bloody and violent strike which spread nation-wide over the railroad networks, prompting President Grover Cleveland to intervene with Federal troops and resulted in the use for the first time of the Sherman Anti-Trust Act to smash the unions.

7. Lowell National Historical Park, Massachusetts—The park interprets labor conditions of mill workers and labor unrest that led to the famous general strike in Lawrence, led by the Industrial Workers of the World, and successive protests in Lowell, Fall River, and New Bedford. United mill workers

prevailed and enjoyed raises rather than the initial pay cuts imposed by management. The unprecedented series of strikes led to important gains for New England's immigrant textile workers.

8. Union Square, New York—A NHL, located in lower mid-town Manhattan, Union Square is nationally significant for the role it has played in American labor history. While the park has been the focal point for well over a century for parades, mass gatherings, soap-box orations and demonstrations, its particular moment in history occurred on September 5, 1882, when the first Labor Day Parade took place. This marked the beginning of organized labor's twelve-year effort to secure passage of national legislation that would set aside one day each year to recognize the contributions and achievements of American laborers.

Conclusion

While the Great Falls Historic District has many resources relating to the thematic concept of Developing the American Economy, it does not appear to have particularly unique resources unlike those already represented in the national park system or protected and interpreted by other public and private entities.

Determination of Suitability

Based on the analysis of many comparable resource types and interpretation already represented in units of the national park system or protected and interpreted by others, this study concludes that the resources of the Great Falls Historic District are not suitable for inclusion in the national park system.

This finding does not in any way diminish the major national significance of the Great Falls Historic District in the history of the United States. Paterson's story is one of great importance to public understanding of the building of the nation. Like Pawtucket, Lowell, Cohoes and other early industrial places, it is a part of the complex American experience that commemorates and celebrates water-powered industry, early industrialists, immigrant laborers, political figures, and our evolving political and economic processes. Its resources are exceptionally worthy of protection and interpretation. Many of the stories of Paterson's contributions to our national heritage can be understood simply by visiting the Paterson Museum which is located in the Great Falls Historic District in a building of the former Rogers Locomotive Works. Most of Paterson's industrial history is represented here including Hamilton and the S.U.M., Colt, the locomotive industry, textile manufacturing, the City's silk production, Holland's first two submarines, and Paterson's other valuable American treasures. Collections pertaining to Hamilton and the S.U.M. are housed at the Passaic County Historical society in Lambert Castle.



Old advertising painted on exterior wall of the former Rogers Locomotive building on Spruce Street; it reads: "Home of Paterson Silk Machinery Exchange." NPS photo.

Paterson is an example of the vision of Alexander Hamilton, American enterprise, and the work of many immigrant and citizen workers who made the nation prosper.

Feasibility Analysis

Since a finding of suitability for potential designation as a unit of the national park system was not the conclusion of the previous *Determination of Suitability* section of this report, a feasibility analysis is not a continuing necessary step in this study. It is offered to

simply complete the analyses of the Great Falls Historic District under all designation criteria.

NPS Management Policies state that to be feasible for inclusion in the national park system, an area must be: 1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment, and 2) capable of efficient administration at a reasonable cost. A variety of factors are normally considered in evaluating feasibility, including land ownership, acquisition costs, access, threats to the resource, public enjoyment potential, the level of local and general public support, and staffing or

development requirements. The evaluation includes consideration of the ability of the NPS to undertake new management responsibilities in light of current and projected constraints on funding and personnel. In recent years, this latter factor has become increasingly important in determining feasibility.

This study concludes that the District is of sufficient size and configuration and there are no significant access issues affecting feasibility. Visitors to the Great Falls may not have internal access to all buildings and sites, but resources that are accessible provide the basis for a valuable visitor experience.

The District could benefit from a more pedestrian and visitor friendly traffic and transportation plan. All roads are open to traffic and visitor safety would be a factor of concern in the operation of a park unit. Traffic congestion, noise and exhaust odor impact the visitor experience negatively.

While threats to the resource have existed and continue to exist, they are not of a scale that requires full NPS management for resource protection. Since most resources in the District are publicly owned, and it would not be anticipated that NPS would seek ownership of any significant amount of District resources, ownership issues do not appear to impact feasibility. During the study process, there have been sufficient indications of public and governmental support for designation.

The feasibility of protecting the natural and cultural resources of the Great Falls Historic District would particularly depend on the demonstrated commitment of the City of Paterson and the State of New Jersey to

manage the resources they own or administer in the District within the parameters of NPS management policies affecting units of the national park system, since a boundary for any potential unit would include both state and city-owned or administered resources. Strong historic resource protection measures would be necessary, consistency in state level management and decision making assured, and local zoning ordinance requirements would have to provide for the continuing integrity of resources and compatible types and intensities of development, uses, treatments, transportation, and signage within any potential park boundary.

To evaluate financial feasibility, analyses of comparable costs of existing units of the national park system of similar size are often used. Costs are normally expressed in ranges.

What are unknown in Paterson are the variables affecting potential costs associated with preserving the district's resources and those necessary to provide adequate visitor facilities. It would not be anticipated that the NPS would acquire resources, other than those necessary for operations and visitor services. Even these could be through a shared arrangement with other entities. Financial feasibility would in large part depend on partnerships with other public and private entities and, as is often the case in budget restricted times, financial or other donations from the public and private sector.

No firm offers of assistance have been forthcoming during the course of the study, although supporters of unit designation have consistently indicated that if the Great Falls becomes a unit of the national park system, such assistance would be available. Lacking

any tangible evidence of such commitments, the direct NPS costs for securing and refurbishing a facility for minimum visitor services and administration needs are estimated between \$3 and \$5 million including any exhibits in a visitor services facility and limited numbers of wayside exhibits in the district.

For a park to be established that results in meaningful resource protection at the Great Falls, this study assumes that financial and technical assistance would be required for non-federally owned resources in the district. This cost is estimated to be authorized at between \$10 million and \$15 million in matching share capital grants based, in part, on the lower end similar investment being made by the State of New Jersey in its newly designated state park. The ability of the City of Paterson to meet significant matching grant requirements is

somewhat questionable due to its own continuing budgetary constraints.

Staffing and operational requirements for the Great Falls have been estimated at between 5 to 10 full time equivalent (FTE) positions with an estimated annual operating cost of \$550,000 to \$1.2 million annually. Other than for facilities owned by the NPS, there would be no anticipated maintenance costs.

The estimates also assume that NPS would not acquire or otherwise own any substantial archives or collections requiring special collection storage facilities. The costs for a general management plan and comprehensive interpretive plan and media development for the District are estimated at \$800,000 to \$1 million. The chart below categorizes potential initial and annual costs.

Capital Expenditures	Administration/Visitor Facilities: \$1.8 to \$3.2 million	Exhibits/Waysides: \$1.2 to \$1.8 million	Historic Preservation Grants: \$10 to \$15 million	Total Capital Expenditures \$13 million to \$20 million
General Management and Interpretive Planning/Media Development	General Management Plan: \$600,000 to 700,000	Interpretive Plan and Media Development: \$200,000 to \$300,000		Total Planning \$800,000 to \$1 million
Vertical Totals By Category (not including annual operations)	Development and Park Planning: \$2.4 to \$3.9 million	Interpretation: \$1.4 to \$2.1 million	Grants: \$10 million to \$15 million	Total Development/ Interpretation/ Grants \$13.8 million to \$21 million
Park Annual Operations between 5 to 10 FTE over first ten-year period (2007-2016)	At low range of \$550,000 per year including annual inflation adjustment: \$6,034,050	At high range of \$1.2 million per year including annual inflation adjustment: \$13,165,200		Total 10-year Estimate for Operations: \$6,034,050 to \$13,165,200



The estimated ranges assume no donor or partnership participation in any costs. Such participation could reduce estimated capital and operational costs proportionally, depending on when such contributions are received. It must be noted that any contributions would also be required to follow stringent NPS partnership policies, requirements and procedures and may, depending on the level of donations, require review by appropriate congressional appropriations committees.

Determination of Feasibility

Under current NPS budgetary constraints, the estimated costs associated with the Great Falls Historic District are not feasible when considering the impact that such costs would have on existing units of the national park system in the Northeast Region, particularly in the State of New Jersey, which must compete for the limited and decreasing funding levels currently available to parks Service-wide.

Analysis of the Need for NPS Management

Since findings of suitability and feasibility for potential designation as a unit of the national park system were not the conclusions of the previous *Determination of Suitability* and *Determination of Feasibility* sections of this report, an analysis of the need for direct NPS management is not a continuing necessary step in this study. It is offered to simply complete

the analyses of the Great Falls Historic District under all designation criteria.

Determination of the need for NPS management is the final criterion for evaluating resources for potential designation as a new unit in the national park system. There are many examples of successful management of nationally significant and important natural and cultural resources by other public agencies, private organizations, and individuals. The NPS applauds these accomplishments and actively encourages the expansion of conservation activities by federal, state, local, and private entities. Unless direct NPS management of a studied area is identified as the clearly superior alternative, the Service will recommend that one or more of these other entities assume a lead management role, and that the area not become a unit of the national park system.

In October 2004 the Governor of New Jersey, by executive order, designated portions of the Great Falls Historic District as one of three new urban state parks. The New Jersey Department of Environmental Protection is presently concluding a national design competition for the first phase development of the park. Phases 1 and 2 of the design competition include the Great Falls, raceways and other cultural resources that comprise the extant resources of the original S.U.M. improvements. The State has pledged \$10 million for improvements at the new park.

The State of New Jersey Department of Environmental Protection, Division of Parks and Forestry, administers a number of state parks that have cultural resources and values significant to the State and our nation. Among them are parks associated with the American

Revolution at Washington's Crossing and Princeton and Monmouth Battlefields, as well as homes of important figures of the revolutionary period.

The Division also provides an understanding of New Jersey's commercial and industrial past at sites such as Allaire State Park, Batsto Village in Wharton State Forest, Long Pond Ironworks at Hewitt State Park, the cranberry and blueberry production history at Whitesbog Village in Brendan Byrne State Forest and at Double Trouble State Park, and the commercial importance of the Delaware and Raritan Canal at that State Park, among others. It administers coastal locations with light houses that represent New Jersey's maritime importance, and Fort Mott that historically guarded approaches to Philadelphia on the Delaware River.

The State also administers Liberty State Park which provides the backdrop to the Statue of Liberty and Ellis Island and contains the Central Railroad of New Jersey terminal that was the first stop for so many immigrants leaving Ellis Island on their way to new lives and locations, including Paterson, in their just adopted land. It is fully qualified and able to protect representative resources of the Great Falls Historic District and to interpret the important contributions that Paterson has made to the industrial history of the United States. This study concludes that there is no need for direct management of the Great Falls Historic District by the National Park Service.

Potential for Affiliated Area Status

Affiliated areas of the national park system are comprised of nationally significant resources

that do not meet other unit designation criteria, but may require some special recognition or technical assistance beyond what is available through existing NPS programs. Such areas must meet the national significance criterion and be managed in accordance with the policies and standards that apply to units of the national park system.

The NPS study team believes that the Great Falls Historic District may be such a resource and with the advent of the newly designated Great Falls State Park, may be suitable for further consideration for its potential as an Affiliated Area of the national park system and congressional designation as a National Historic Site. The resources included in the state park are those that are primary to the NHL designation.

Legislation is already in place affecting the Great Falls Historic District that authorizes the Secretary of the Interior to provide the types of assistance that are often extended to affiliated areas. Among other benefits of affiliation, the areas so designated are entitled to display the NPS Arrowhead logo on signage and in appropriate marketing and interpretive materials and exhibits. Both the New Jersey Pinelands National Reserve and the New Jersey Coastal Heritage Trail are affiliated areas of the national park system. The NPS has provided substantial financial and technical assistance to the Pinelands National Reserve since its congressional designation in 1978, and to the Coastal Heritage Trail since its designation in 1986.

Congress enacted Public Law 104-333 in 1996. Section 510 of the Act established the *Great Falls Historic District* and authorized \$250,000 for grants and cooperative



agreements for the development of a plan for the District, \$50,000 for the provision of technical assistance by the Secretary of the Interior, and up to \$3,000,000 for the provision of other assistance for restoring, repairing, rehabilitating, and improving historic infrastructure within the District. All funding requires a 50% local match. Funding has not been appropriated by Congress under Section 510, in part, because of concerns regarding the ability of the City to meet the 50% matching requirements. With the forthcoming park financial investment by the State of New Jersey, the matching requirement appears to be of less concern.

With the advent of the Great Falls State Park designation in 2004 and the State of New Jersey's commitment of funds, it may be advantageous for the State and the NPS to consider partnering in the protection and interpretation of the District's proven nationally significant resources. Until such time as the plans for the entire Great Falls State Park are better understood, it would be premature for this report to recommend Affiliated Area status as a study alternative. But, should the State of New Jersey and the City of Paterson conclude that its goals and policies affecting the Great Falls Historic District can be accomplished in a manner that reflects NPS Management Policies for units of the national park system, a reconnaissance level survey could be completed at an appropriate time to make these determinations. A reconnaissance would also assist in determining the nature of any amendments to P.L. 104-333 that would be needed to accomplish mutually agreed upon preservation objectives for the Great Falls Historic District.

Study Conclusions

This congressionally authorized Special Resource Study of the Great Falls Historic District in the City of Paterson, New Jersey concludes that resources in the Great Falls Historic District:

1. meet the criterion for national significance; and,
2. fail to meet the criteria for suitability, feasibility, and need for NPS management.

This study further concludes that the Great Falls Historic District may have the potential to meet the requirements for designation as an Affiliated Area of the national park system if the State of New Jersey and the City of Paterson, after plans for the Great Falls State Park are more complete, express an interest in such a designation and are prepared to demonstrate that the management of the resources in the study area can be accomplished in accordance with NPS Management Policies and standards.



ALCO-Cooke locomotive #299, built for the Panama Railroad, rests in front of the Rogers Mill, home of the Paterson Museum. NPS photo.

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Designation