



December 27, 2007

Dr. David A. Poirier, Staff Archaeologist
Connecticut State Historic Preservation Office
Connecticut Commission on Culture and Tourism
One Constitution Plaza, Second Floor
Hartford, CT 06103

**RE: *Archaeological Documentation of Historic Industrial Activities
Ansonia Copper and Brass, Inc. (Holmes, Booth and Haydens Brass Works) Facility
Waterbury Generation LLC
725 Bank Street, Waterbury, CT***

Dear Dr. Poirier:

Raber Associates recently completed a documentation to SHPO standards of the referenced facility, in response to the first of three mitigative measures outlined in the September 18, 2007 letter from Karen Senich to John P. Campbell. Your office has reviewed and accepted that documentation. Based on research completed during that documentation, this letter and the attached figure addresses the third mitigative measure outlined in the September 18, 2007 letter, to the effect that project proponents shall monitor and document "...any industrial archaeological remains exposed through project-related ground disturbance."

Other than a small, 1-story, free-standing mid-20th-century wood office inside the existing mill, no standing structures will be removed or significantly altered for the project. In the project area subject to subsurface disturbance, we believe that any archaeological remains documented should provide significant new information about this site, which is eligible for the National Register of Historic Places, or about Connecticut's brass industry in general. The density of development associated with this brass mill, as shown on the attached figure, appears to preclude the potential for significant resources which pre-date the 1853 opening of the mill. As summarized below, our research also suggests that the nature of mill structures and activities in the project area makes it unlikely that significant resources associated with brass manufacture or other historic industrial contexts will be disturbed by project construction.

Available maps indicate the possible or likely presence of footings or foundations from approximately thirteen structures, built c1870-1917. These structures include eleven 1-to-2-story frame or masonry structures built for storage, garage, and laboratory purposes, and all or part of two 3½-story brick buildings built c1887 and c1912 for shipping, storage, and light manufacture. The eleven smaller structures evidently had no basements and no manufacturing activities, and subsurface remains of the smaller structures have likely been heavily disturbed by demolition and recent utility construction. Portable artifacts associated with these structures are likely of well-documented late 19th- and 20th-century types. Finished or unfinished brass products might be found in disturbed contexts, but the value of these materials for re-manufacture and the well-documented nature of the products make extensive recovery of significant brass artifacts unlikely. Archaeological work at the small structures would probably produce no new information other than to confirm or map the location of structures shown on historical images, and to document any shallow foundation systems. The two larger structures had basements, but no manufacturing activity other than stamping work on the first floor of the c1887 structure is believed to have occurred in the project area. Any foundations of heavier equipment were installed elsewhere at this complex, as discussed in our documentation, and any equipment used in the c1887 building was relatively lightweight and almost certainly removed prior to demolition. While the deeper and heavier foundations of the larger structures probably remain largely intact, we believe that the likely significance of these remains is no greater than that noted above for the smaller structures. In the case of the c1887 building, much of that structure remains intact outside the project area, with the foundation system available for any future studies.

81 Dayton Road • P.O. Box 46
South Glastonbury • CT 06073
(860) 633-9026 voice/fax/mraber@aol.com (e-mail)

It also appears unlikely that significant archaeological information not directly associated with the buildings would be discovered in the project area subject to subsurface disturbance. Documentation research indicated this brass mill site never had waterpower, unlike comparable sites in Waterbury, and the known or likely utilities/conduits appear to consist of water, sewer, electrical, and drainage facilities.

Based on the information reviewed above and shown in the attached figure, I do not recommend archaeological monitoring or documentation for this project. Archaeological material would almost certainly be recovered, but this material would likely not meet National Register significance criteria.

To address the remaining mitigative measure outlined in the September 18, 2007 letter, Raber Associates will prepare and submit a brief history and description of the site, with project-related information, maps, and photographs, to the *Society for Industrial Archeology New England Chapters Newsletter* in the next few weeks.

Please contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Raber". The signature is stylized and cursive.

Michael S. Raber

Attachment

xc: Richard T. Laudenat, FirstLight Power Resources Services, LLC
John P. Campbell, FirstLight Power Resources Services, LLC

