COMPREHENSIVE MUNICIPAL INVENTORY GUIDELINES

Pursuant to the Pinelands Cultural Resource Management Plan for Historic Period Sites

SEPTEMBER 1988
NEW JERSEY PINELANDS COMMISSION
GUIDELINES FOR THE DEVELOPMENT
OF COMPREHENSIVE MUNICIPAL
INVENTORIES

Pursuant to the Pinelands Cultural
Resource Management Plan for Historic
Period Sites

New Jersey Pinelands Commission
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BACKGROUND

A comprehensive municipal inventory (CMI) is ideally a listing of all the areas and sites of cultural significance within a township's boundaries as well as a determination of areas of no cultural significance. The culturally significant sites should include both structural and archaeological remnants and should comprise both the prehistoric (American Indian) and the historic (i.e., post 1600 A.D., when European settlement of New Jersey began) periods. Such a listing would be an invaluable aid for public education as well as for planning purposes. However, it would be extremely difficult to compile, if indeed it were to account for all the areas used and/or occupied by humans at any time in the past. A truly comprehensive inventory would require extensive subsurface testing to ensure that all loci of historic and prehistoric activity within a municipality have been identified. This testing would involve auger clusters or posthole excavations, with the spoil being sieved to retrieve small artifacts. Obviously it is impractical to test an entire township in this manner at the intervals (100 ft. maximum) currently recommended for cultural resource surveys.

For this reason, the Pinelands Commission has drafted guidelines for the development of comprehensive municipal inventories which are affordable, but which still provide
definitive information as to the status of historic period resources at a development site. For municipalities within the Pinelands Area, this information would be useful to local review agencies which must decide when to require a cultural resource survey pursuant to proposed development. The Commission's guidelines are not designed to address the incidence of prehistoric site occurrence within a municipality. Because these sites are relatively invisible and undocumented, their detection and management require a different approach, which is discussed later (see p.4). In the context of these guidelines, the terms "historic" and "historic period" will refer only to resources which postdate 1600 A.D. and not to those reflective of Native American culture.

PURPOSE AND DESCRIPTION

The Pinelands comprehensive municipal inventory is meant to be used by a town principally in its development review and permitting capacity. As referenced in the Pinelands Cultural Resource Management Plan for Historic Period Sites, a CMI involves an investigation of the extant historic resources of a municipality at sufficient intensity to be able to make informed decisions about their presence or absence in areas proposed for development. Although it is strongly recommended, municipalities are not required to complete a comprehensive municipal inventory. The CMI is
intended as an option available to towns that wish to facilitate the evaluation of cultural resources for projects subject to Pinelands Commission review.

Since the inventory is targeted for use in permitting, detailed information about the history of each site uncovered, though desirable for public education programs, is not necessary. Sites identified in the inventory as being of possible significance can be more intensively researched at a later date, either when development is proposed (and a cultural resource survey is required as part of the development application) or as a student research project included as part of a social studies curriculum.

A CMI developed along the Commission guidelines will provide two types of information:
- a list of all known historic period sites of definite or possible significance
- a determination as to the status of historic resource information in every area of a township.

The inventory listings must include all sites which are potentially significant (a significant site is one eligible for Pinelands Designation and the National Register of Historic Places), not just those which have already been evaluated and either Designated or judged eligible for Designation. The inventory will also result in a grouping
of all portions of a municipality (except, at local option, publicly held lands not subject to development) into one of five categories. These categories rank areas according to the amount of information available about the presence or absence of historic resources. Places where Designated sites occur or there is a high potential for significant resources are placed in either Category I or II, while areas possessing modern or historically inconsequential sites will likely be ranked in Categories IV or V. With these rankings municipal officials will be able to tell at a glance those lots which should be surveyed before development can proceed.

COMPREHENSIVE PLANNING FOR PREHISTORIC SITES

The CMI guidelines are designed solely for historic period sites because of the greater difficulty and expense involved in inventorying prehistoric sites. Native American sites are usually represented by no more than a scattering of lithic artifacts at the surface, which are themselves only recognizable to the trained eye. Although the Pinelands Commission maintains an inventory of previously reported American Indian sites, it is not sufficiently comprehensive for use in development review decisions. Since this inventory represents an unsystematic collection and is biased in favor of developed areas over undeveloped, clearings over forested tracts, stream banks over upland
divides, etc., it cannot accurately reflect the true incidence of prehistoric site occurrence throughout the region. Many of the less accessible areas of the Pinelands and those intuitively judged by collectors to be less likely to yield artifacts have never been subjected to more than a cursory review.

The most effective and economical means of gaining reliable data on prehistoric site locations is through development of a predictive model. Such models have been effectively employed in many parts of the country to predict the likelihood of site occurrence over large areas. They generally are designed to identify various environmental factors and micro-environments in a test area and then, through random sampling of these settings, determine those that are most often associated with aboriginal site locations. From the initial results of this limited testing the likelihood of site occurrence is postulated for the entire region. These projections are themselves tested over time to determine their accuracy.

Pinelands municipalities are encouraged to undertake predictive model surveys, either individually or jointly with neighboring towns. A well executed model would allow planning boards to make quick and reliable decisions about the need for a survey at development sites; it would also provide information useful in public school programs for teaching children about their rich and very ancient heritage. Partial funding for models is available through U.S.
Department of the Interior Historic Preservation Fund matching grants, administered by the Office of New Jersey Heritage (New Jersey Department of Environmental Protection). The expense of a model can be further defrayed through joint sponsorship by several adjoining municipalities. Testing over a large area is more efficient and would significantly reduce the cost per township.

The Pinelands Commission is presently studying the feasibility of developing a predictive model for the entire Pinelands Area. A long-term work plan for a regional model has been developed and the Commission will begin implementation of phase I of the model in 1988. However, the model itself will likely not be completed anytime soon, given funding limitations and the enormous area involved. In the absence of the model, development review decisions regarding the need for site specific surveys will continue to be made by the Commission on a case-by-case basis. Municipalities that may wish to streamline this process should seriously consider undertaking a model on their own.

EFFECT OF A COMPREHENSIVE MUNICIPAL INVENTORY

Although it is not required for conformance with the Comprehensive Management Plan, development of a CMI presents advantages to a municipality. An inventory which is certified by the Pinelands Commission allows a municipality to make essentially a final decision as to the need to survey for historic sites prior to beginning development in the
Pinelands Area. Once a strategy is adopted for the protection of prehistoric sites via a predictive model or a full scale survey, a municipality will have all the tools necessary to make a definitive decision regarding survey requirements without having to consult the Commission. Although the Commission retains its review and "call-up" powers, a bona fide decision based on the inventory should be accepted by the Commission. This expedited review process should make towns with a certified CMI more attractive to developers.

A CMI completed according to the guidelines enumerated below can be accomplished without undue cost to a municipality. Much of the time consuming work, such as an initial listing of extant historical structures, can be done by volunteers (with a short training session) or by a local historical society. The end result will be a compendium of known sites and historically sensitive and non-sensitive areas that is directly translatable to development review decisions. The inventory will also be useful should the municipality choose to participate in the state Certified Local Government (CLG) program or to seek grants or revolving loans through the New Jersey Historic Trust. The Trust funds are dedicated to rehabilitation of historic buildings or for infrastructure work in designated historic districts. The CLG program qualifies towns for further federal grant moneys for historic preservation projects (information on these funding sources is available from the Office of New Jersey Heritage, CN 404, Trenton, NJ 08625).
GENERAL REQUIREMENTS

1. Access to information on archaeological site locations must be restricted in order to prevent looting of sites.

2. Inventory information must be compiled on New Jersey State Inventory forms (available from the Pinelands Commission or the Office of New Jersey Heritage).

3. The inventory must be reviewed and updated biennially.

4. The inventory must include an assessment of imminent and probable threats to the resources identified.

5. The inventory must include a classification of each resource identified with reference to the resource groups contained in the Pinelands Cultural Resource Management Plan for Historic Period Sites (CRMP).

6. The inventory must list all identified resources by block and lot and must include maps at an appropriate scale which indicate the locations of all resources.

7. The inventory listings must be compiled and presented according to the specific guidelines listed below and must be approved by the Pinelands Commission.

8. The inventory must be compiled under the general direction of an individual who meets the relevant standards in the federal "Qualifications for Professionals" (36 CFR 61).
GUIDELINES FOR COMPILING THE INVENTORY

A comprehensive municipal inventory comprises a survey (background documentary research and field investigation) of cultural resources and a report detailing the results of that survey. Before beginning the field portion of the survey, a town should openly advertise the fact that crews will shortly be out recording resources. This will allay any fears of residents about strangers taking notes on their property and may also encourage individuals to come forward with historical information. It would also be advisable to issue temporary identification cards to the field crews.

The survey must include the following:

1. Sufficient background research on the natural environment (i.e. soils, vegetation, drainage, topography, land use, geomorphology, etc.) to allow predictions to be made about:

   a. the general nature and distribution of expected cultural resources (e.g., what environmental factors may have influenced site distribution?);
   b. the kinds of expertise and methods required to locate, identify, record, and evaluate the potential cultural resources in the area, based on known environmental factors; and
   c. the relationship between the study area and its regional environmental setting.
Much of this information is available from various reports prepared for the Pinelands Commission.

2. Documentary background research on historic and architecturally-historic properties in the project area, to develop a concise, historical analysis of the study area, including an identification of historic and social factors which influenced the development of the area, and a discussion of general historic values and data categories to be expected for this area. This research should include:

a. a thorough search through the National Register of Historic Places (NRHP), the New Jersey State Register of Historic Places (SRHP), the New Jersey Historic Sites Inventory, the New Jersey Indian Site Survey, the Pinelands Commission Cultural Resource Inventories, the Annotated Bibliography of Cultural Resource Survey Reports Submitted to the New Jersey State Historic Preservation Officer, and site files of local researchers and educational institutions;

b. a search for maps, photographs, and drawings relevant to the study area;

c. a review of ethnographic and ethnohistoric works, historic studies, architectural papers, etc., which might yield information on the study area; and
d. investigation of primary historic accounts such as diaries, journals, letters, newspapers, and papers of persons associated with the study area.

3. **Archaeological (prehistoric and historic) background research, to include:**

   a. a thorough search through the NRHP, the SRHP, the New Jersey Historic Sites Inventory, the New Jersey Indian Site Survey, the Pinelands Commission Cultural Resource Inventories, the Annotated Bibliography of Cultural Resource Survey Reports Submitted to the New Jersey State Historic Preservation Officer, and site files of local researchers and educational institutions;

   b. a thorough investigation of published reports, journals, and papers on archaeological resources previously identified and studied in the project area;

   c. contact with nonprofessional and professional archaeologists who have experience working at archaeological sites or with archaeological data from within the study area;

   d. an understanding of the special kinds of methods and expertise which would be useful in the field.

4. A thorough "windshield" survey of the entire municipality at a sufficient level of intensity to:
a. identify current development patterns throughout the municipality and to define general areas presently devoted to a single activity or to related activities (e.g., residential areas, commercial areas, agricultural areas, industrial areas, etc.);

b. identify anomalies (areas altered by cultural activity) which are not documented in the historical record; and

c. record on state inventory forms all sites or structures of possible historic, architectural or engineering significance

5. **A complete pedestrian surface inspection of all anomalies** identified in the windshield survey and all other areas of the township not otherwise accessible.

6. **Evaluation of survey results**, to include:

a. types of data categories and cultural values thought to be present;

b. the cultural, functional and chronological relation of sites within the municipality to each other;

c. significance of cultural resources in terms of NRHP criteria (36 CFR Part 800.10) and Pinelands Designation standards (N.J.A.C. 7:50-6.154); and
d. importance of resources in terms of their regional and cultural setting.

GUIDELINES FOR THE FINAL REPORT

The final report/inventory should reflect the results of the documentary research and field investigation and must include:

1. a description of the areas examined, including but not limited to: soils, vegetation, drainage, land uses, present conditions, topography, historic and prehistoric sites, architecturally-historic properties and engineering resources;

2. a description of the survey research design and fieldwork methodology, with an evaluation of the effectiveness of the survey and a discussion of any conditions which affected the survey (e.g., weather, access to study area, density of ground cover, etc.);

3. a discussion of the regional cultural and natural environment, including the comparative cultural relationships of sites in the municipality to each other.

4. identification of all reported cultural resources according to the resource groups contained in the CRMP
and an inventory of known or suspected cultural resources of significance in the municipality, to be completed on state inventory forms, arranged in a clear and reasonable format and keyed to the map(s) described below;

5. a map or maps at appropriate scale, identifying all the cultural resources in the municipality according to the five categories described on pp. 16-17.

6. an evaluation of the potential significance of each identified resource and an opinion as its eligibility for the National Register and for Pinelands Designation;

7. based principally on the municipal master plan and zoning ordinance, an analysis of the potential impact of anticipated development on the municipality's resource base as well as a discussion of what the loss of part or all of these resources will have on present and future public appreciation and/or scientific investigations;

8. a complete listing of all references and sources consulted in the course of conducting the survey and preparing the report (including documentary research, fieldwork, etc.);
9. names and professional qualifications of principal individuals associated with the survey (including those involved with the documentary research, fieldwork, report preparation, etc.).

In order to facilitate development review decisions, the final inventory and report must also reflect a determination that each site or area identified in the survey falls under one of the five following categories:

**Category I** - sites/areas possessing resources that are on or have been determined eligible for the State or National Registers or that have been locally or Pinelands designated.

**Category II** - sites/areas possessing resources of possible, but as yet undetermined, significance (as defined by the criteria for Pinelands Designation).

**Category III** - Areas where access was not gained because of owner objection and thus the historic potential is undetermined.
Category IV - Sites/areas not eligible for Pinelands Designation or the National Register, but possessing a cultural remnant reflective of patterns of land use and requiring minimal recording.

Category V - Sites/areas where there is no evidence of a cultural activity or none that requires further documentation.

If a municipality desires for its own purposes (such as public education or identification of an historic district), it may further subdivide these categories (particularly the first two categories) to gain a more precise accounting of extant resources. For instance, if a Category I area is identified which is eligible for historic district designation, the inventory could list buildings within the proposed district according to their relative significance, e.g., "critical," "contributing" and "non-contributing." This would also further facilitate development decisions.

Once all the local cultural resources have been categorized, the municipality can make quick, informed decisions as to the need for a cultural resource survey at development sites according to the following formula:
<table>
<thead>
<tr>
<th>CATEGORY OF RESOURCE</th>
<th>REQUIRED TREATMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category I</td>
<td>No survey required since significant resources have already been documented; follow appropriate treatment prescriptions contained in the CRMP.</td>
</tr>
<tr>
<td>Category II</td>
<td>Require a cultural resource survey.</td>
</tr>
<tr>
<td>Category III</td>
<td>Conduct a site inspection or request the Pinelands Commission to determine if a survey should be required.</td>
</tr>
<tr>
<td>Category IV</td>
<td>Waive the survey requirement, but require recording of the resources according to the guidelines in the CRMP.</td>
</tr>
<tr>
<td>Category V</td>
<td>Waive the survey requirement.</td>
</tr>
</tbody>
</table>

These inventory guidelines have been designed specifically to avoid the need for archaeological testing, a costly and time consuming process. Once the initial inventory has been compiled, a municipality may desire to reduce
the number of areas subject to a cultural resource survey because of uncertainty (Categories II and III), particularly where development is likely in the near future. In those cases, the town may choose to undertake "Stage I" archaeological testing of selected areas in order to gain more concise information about their cultural resource status. As defined by the Office of New Jersey Heritage, a Stage I survey "includes subsurface testing to identify the presence or absence of archaeological resources and provides general descriptive information about potentially significant historic and architectural properties."

Portions of a township under public ownership where no development is ever anticipated may be excluded from the survey, but the inventory must specifically identify these areas. Of course these tracts may be subject to an individual survey at a later date if they are opened for development. This provision is essentially intended for large, open areas such as state forests rather than for small municipal lots. The inventory would be difficult to administer and would not be truly comprehensive in scope if a series of small lots were excluded.

For further information on inventories, surveys and cultural resource management, see "Guidelines for Local Surveys: A Basis for Preservation Planning," National Register Bulletin No. 24 (Reissued 1985), published by the
U.S. Department of the Interior, National Park Service
(available from the Office of New Jersey Heritage).