



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMUNITY INVESTMENT AND ECONOMIC REVITALIZATION HISTORIC PRESERVATION OFFICE

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HPO Project # 20-0608-21,-22,-23

Doc ID #HPO-C2024-218

March 22, 2024

Keith Kazmark
Village Manager
Village of Ridgewood
VIA EMAIL, kkazmark@ridgewoodnj.net

**RE: Bergen County, Village of Ridgewood
Zabriskie-Schedler Property Park Development Plan
Application for Project Authorization
New Jersey Register of Historic Places Act Review
John A.L. Zabriskie House (SR 8/14/2019; NR 11/22/2019)**

Dear Mr. Kazmark,

Thank you for submitting an application for project authorization (Application) pursuant to the New Jersey Register of Historic Places Act (NJRHPA) for the above-referenced proposed project. According to your Application, the project involves the construction of a multipurpose park, including an approximately 410-foot by 270-foot (2.6-acre) multi-sport turf athletic field, perimeter walking/hiking trail, playground, bathrooms, parking, and other landscaping.

Historic Preservation Office (HPO) staff has reviewed the information provided and determined that the Application is not yet technically and professionally complete and sufficient in accordance with N.J.A.C. 7:4-7.1(d). The HPO therefore requests that the Village of Ridgewood and/or its consultants submit the following documentation, which is required in order for the Application to be considered complete:

- Complete list of government units and statewide or local organizations with an interest in historic preservation, as required in Section A.1.d of the Application. The HPO has previously advised the Village that the Friends of Schedler must be included on all applications as a local organization specifically concerned with historic preservation at this location. Based on correspondence received by the HPO to date, the Capt. Abraham Godwin Chapter New Jersey Society, Sons of the American Revolution have also expressed an interest in the preservation of this site and should be included. As indicated in the instructions, the list of organizations included in the application must include addresses.
- Statement of purpose, as required in Section C. Pursuant to N.J.A.C. 7:4-7.2(e)6, the Historic Sites Council shall consider the public benefit of the proposed undertaking in rendering its decision. Therefore, it is imperative that the Application include a clear narrative that describes the project need and how the proposed park development will meet that need, resulting in a public benefit to the community. The Application includes a collection of statements and newspaper articles but lacks a unified, coherent, and cogent statement of

purpose for the proposed development. This section must be revised to include a clear statement explaining the need, purpose, and public benefit of the proposed undertaking and include specific data to support these claims. This data should include, but is not limited to: the number of existing athletic fields in the Village and the current usage of those fields; the current and projected need for athletic fields in the community, including the number and size based on the sports played and age of participants; and how the development of the proposed new athletic field will address current and projected needs. Some of this data is included in the appendices, but the information is fragmented and incomplete, and in some cases lacks sufficient context for evaluation. For example:

- The Statement of Purpose includes a newspaper article regarding the flooding of athletic fields used by the Ridgewood schools. However, there is no statement regarding the anticipated users of the new field at the Zabriskie-Schedler House. Will it be used by the schools, local athletic organizations, or some combination thereof? A clear indication of who the intended users will be is required.
- Appendix 13 provides data regarding field use for RJFA; however, there is no explanatory information identifying who or what RJFA is, or whether it is the only organization that utilizes athletic fields in the community. How many organizations does the Village anticipate will use these fields? How many participants do these organizations have, and what are their ages? Does the Village have a recreation plan that identifies the facilities needs of the community? If so, the plan should be cited in the narrative and provided as supporting documentation to your Application.
- Appendix 14 includes a map of other athletic fields in the Village. The map key is illegible, and the scale is inadequate to convey the intended information. In addition to the map, the Application should include a list of all available athletic fields in the Village and data regarding their usage.
- Appendix 23 provides “Sports Use Numbers” but does not compare the number of games to the number of existing fields. This analysis is needed to understand the project need.

The narrative may be supplemented with appendices similar to those referenced above, but they are not a substitute for a narrative statement of purpose.

- An alternatives analysis, as required in Section D. Pursuant to N.J.A.C. 7:4-7.2(e)6, the Historic Sites Council shall consider whether or not feasible and prudent alternatives to the encroachment exist. The alternatives provided lack the level of detail and analysis required for the scale and scope of the proposed park development. For example:
 - Alternative 2 states that “many design alternatives were considered” but provides no detail regarding what these alternatives entailed, whether they met the project need, or what their effects would be on the historic property. This section of the alternatives analysis must include, but is not limited to, the 2008 concept plan; the plan developed in consultation with HPO staff in 2022; and the current design (preferred alternative) with a grass field instead of turf.
 - Alternative 3 simply states “another build site,” with no analysis of available locations, the cost of acquisition and development, or other pertinent information. This alternative must address the availability of property for purchase, and the presence or absence of existing municipal property that could be developed for athletic fields.

Additional analysis of the remaining alternatives is also required. In all cases, the analysis of alternatives must be sufficiently detailed and rigorous to permit independent comparative evaluation of the benefits, costs, and environmental risks of the proposed project and each reasonable alternative. This should include a narrative summary of the preferred alternative and justification for its selection.

- Pursuant to N.J.A.C. 7:4-7.1(d)10 and APA Section “Other Information” and “List of all Documents,” the draft Phase IB Archaeological survey report by Richard Grubb & Associates, Inc., remains technically deficient (see the archaeological section below).

In addition to the above-named required information, the HPO offers the following additional comments regarding the Application:



- The Table of Contents indicates that Hunter Research, Connelly & Hickey, and Barton Ross, AIA, were involved in the preparation of the Application; however, none of their resumes were included. Unless these firms were directly involved in the development of the proposed park project (as opposed to the rehabilitation of the Zabriskie-Schedler House, which is a separate undertaking), their names should be removed. If they were involved, then please include their resumes in the revised Application.
- Appendix 3 is comprised entirely of letters of support for the Village's 2021 grant application to the New Jersey Historic Trust for the rehabilitation of the Zabriskie-Schedler House. The rehabilitation of the house is not the subject of the current application; therefore, these letters are not relevant to the current undertaking.
- Appendix 16, "Two Historic Preservation Office Letters and Keith Kazmark's Responses," does not contain the information cited.
- Appendix 17 also includes numerous letters of support for a grant application to the New Jersey Historic Trust for the rehabilitation of the Zabriskie-Schedler House. The rehabilitation of the house is not the subject of the current application; therefore, these letters are not relevant to the current undertaking.
- Appendix 18, "Village's Project Budget and Funds Expended to Date," does not contain the information cited.
- Appendix 19 contains a statement from the Village engineer regarding the absence of wetlands on the site. The HPO recommends including documentation regarding the New Jersey Department of Environmental Protection's (NJDEP) assessment of the site.
- Appendix 20, OPRA Requests, is irrelevant to the Application.

Archaeology

These comments are in response to the addendum email response with attached, revised Phase IB archaeological site map received at the HPO on February 8, 2024, in response to HPO comment (B2024-008).

Phase IB Archaeological Testing Program

The email acknowledges that the Phase IB survey was conducted without prior knowledge of Hunter Research's 2023 archaeological monitoring report (and not disputed by the HPO). The email states that Phase IB survey was not conducted within areas of "obvious surficial disturbance", i.e., the area of the Hunter 2023 utility monitoring and the roadside berm. Please be aware, based on the results of the Hunter 2023 monitoring report that the fill encapsulated intact soil stratigraphy below the area RGA visually assessed as low archeological potential during the Phase IB survey, confirms the appropriateness of testing hypotheses and not treating them as statement of fact based on limited survey data. Finally, the areas of "obvious surficial disturbance" are still not delineated in the revised site map.

The email further states that based on the lack of artifacts and features identified by the Hunter Research 2023 report within the water main trench, no additional archaeological consideration of that area is necessary. Please be aware, while archaeological monitoring for machine-excavated trenches is useful for quickly identifying large archaeological subsurface features, its course-grained sampling methods are less useful for identifying individual artifacts and small artifact clusters, such as dwelling middens, based on a lack of controlled sampling and detailed recordation as defined in the HPO's Phase I survey guidelines. In consequence, the HPO is concerned that the intact stratigraphy encapsulated below modern fill as identified in the monitoring report remains unsampled for the presence or absence of contributing archaeological deposits.

In consequence, HPO requests that Phase IB shovel testing shall be completed within the existing testing gaps (excluding the existing roadside berm footprint) in order to determine whether archaeological deposits are present in these areas of the project site.



Metal Detecting Survey

The site map was updated including the limits of the Phase I metal detecting survey per the HPO request. The HPO concurs with the Phase IB survey report that no clear, Revolutionary War period military-related artifacts were identified within the metal detecting survey area (although a few non-metal artifacts around the house remain unclear). The remainder of the park beyond the metal detecting survey limit and the roadside berm continues to possess high sensitivity for Revolutionary War military-related artifacts until future survey provides additional data. Finally, the HPO concurs with the letter that metal detecting results are limited to within one foot of the surface and that any metal detecting survey is unable to penetrate below modern fill one foot thick or deeper within the park.

Please be aware, the public release of un-redacted, sensitive archaeological information to the general public puts these archaeological resources under threat.

Additional Comments

The HPO acknowledges the Village's request for a special Historic Sites Council meeting for this project. Once we are in receipt of a technically complete Application, we will determine whether a special meeting is feasible.

The HPO looks forward to receiving the above-referenced required information for our review. Once a technically complete Phase I archaeological survey report is received, informed comment can be provided regarding the submitted Phase II archaeological survey work plan expanding upon the HPO's initial comment on the work plan (B2024-008).

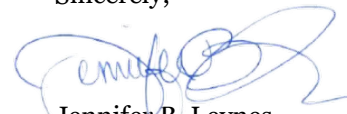
Please note, the HPO now requests that all Applications be submitted electronically to our office. Instructions for the HPO's e-submission process can be found on our website:

<https://www.nj.gov/dep/hpo/4sustain/info.htm>

As indicated in the e-submission instructions, you may request an upload link for files too large to transmit via email. It is also appropriate and advisable to copy the project reviewers, Vincent Maresca and Jennifer Leynes, on your submission.

Thank you for your consideration on this matter and please reference the HPO project number **20-0608** in any future calls, emails, or written correspondence in order to expedite our review and response. If you have any questions regarding archaeology, please do not hesitate to contact **Vincent Maresca** at Vincent.Maresca@dep.nj.gov; any other questions may be directed to me. Thank you for your cooperation with this review.

Sincerely,



Jennifer B. Leynes
Program Specialist 3

cc, via email: Paul McEachen, RGA
Chris Rutishauser, Village of Ridgewood
Elaine Gold, Bergen County Division of Cultural and Historic Affairs
Friends of Schedler
Ridgewood Historical Society
Ridgewood Historic Preservation Commission
Preservation New Jersey



Crossroads of the American Revolution
Capt. Abraham Godwin Chapter New Jersey Society, Sons of the American Revolution
Margaret Hickey, Connolly & Hickey
Richard Hunter, Hunter Research
Barton Ross, AIA

