



Katie Hobbs  
Governor

# ARIZONA STATE PARKS & TRAILS

Bob Broscheid  
Executive Director



September 22, 2023

Phil Garthright, Senior Planner  
Development Services  
City of Coolidge  
131 W. Pinkley Avenue  
Coolidge, AZ 85128  
pgarthright@coolidgeaz.com

Re: Coolidge, Maricopa County; Coolidge 2035 General Plan Update; City of Coolidge; SHPO-2023-1105 (171072)

Dear Mr. Garthright:

Thank you for the invitation to review and comment on the draft Coolidge 2035 General Plan Update (the Plan), in accordance with Arizona Revised Statutes: 9-461.06(D). The State Historic Preservation Office's (SHPO) role in this review and any subsequent actions that may be completed under the Plan is considered non-mandated unless there is a state or federal nexus, including but not limited to funding and/or permitting.

### General Comments

1. When a state or federally-funded or -permitted project has the potential to affect historic properties (prehistoric/historic archaeological sites, districts, buildings, structures or objects listed in or determined eligible for listing in the Arizona/National Register of Historic Places [ARHP/NRHP]), formal consultation with our office should be initiated before any work proceeds. SHPO's reviews are conducted pursuant to A.R.S. 41-861 through 41-864, the State Historic Preservation Act (State Act) or 54 USC §306101 et seq, the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR Part 800 (Section 106). When consulting with our office on non-mandated projects, our review will be in line with State Act consultation.
2. SHPO recommends adding commitments and procedures for conducting consultation with Native American Tribes that may be affiliated with the area to identify concerns with any natural and cultural resources that may be affected under this plan. Tribes with ancestral ties to the area can be identified using the Government-to-Government Consultation Toolkit available on the SHPO website at <https://sites.google.com/view/az-consultation-toolkit/home>.

### Specific Comments

Currently the City of Coolidge has three architectural resources listed on ARHP/NRHP: Casa Grande Ruins National Monument, Coolidge Women's Club, and the Verdugo Homestead Historic District. However far more historic resources within Coolidge exist that are eligible for listing in the Register. More information is available at <https://azstateparks.com/national-register-of-historic-places> and we would be happy to discuss the process with City. For properties listed on the A/NRHP, the following financial incentives would be available:

- The State of Arizona maintains a property tax reduction program for non-income-producing properties listed on the ARHP/NRHP and a property tax incentive program for income-producing properties. This program is administered by the SHPO in conjunction with the county assessors.
- The Federal Investment Tax Credit Program authorizes a 20 percent investment tax credit coupled with accelerated depreciation for income-producing properties. The SHPO is responsible for reviewing the eligibility of properties for the ARHP/NRHP as well as rehabilitation plans to ensure their compliance with the Secretary of the Interior's Standards for Rehabilitation.
- Through our office, the Heritage Fund provides grant opportunities for historic preservation projects for buildings listed on the ARHP/NRHP. Eligible applicants include non-profits, governmental entities, cities, tribal governments, and state agencies.

Historic Preservation overlaps with many of your topic matters, in particular: Land Use, Growth Areas, and Environmental. The following issues would be relevant to explore within your Plan:

- Encouraging the preservation and reuse of Coolidge's historic buildings. SHPO highly recommends the inclusion of historic and cultural resource preservation within Coolidge's general plan update, as it aligns with many planning goals: placemaking, responsible growth and redevelopment, and cultural/environmental stewardship.
- The State of Arizona and the National Park Service administer a historic preservation certification for local cities and towns, called the Certified Local Government (CLG) Program. Municipalities with identifiable historic and cultural resources are eligible to be a CLG, which brings with it institutional support for historic preservation, including noncompetitive grant funding.
- Promoting the City's rich cultural heritage through the identification, inventory, and assessment of prehistoric and historic archaeological resources and incorporating them into land use decisions.

We also invite you to attend our statewide historic preservation conference to be held in Tucson, October 25-27th (see <https://www.azpreservation.org/conference>) and to participate in the development of our comprehensive statewide historic preservation plan, which is undergoing the first wholesale redraft since 1996; more information will be coming in the near future. Please don't hesitate to contact me at [cklebacha@azstateparks.gov](mailto:cklebacha@azstateparks.gov) or by phone at 602.542.7140 if you have any questions.

Sincerely,



Caroline Klebacha, Archaeological Compliance Specialist  
Arizona State Historic Preservation Office