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ARIZONA STATE PARKS & TRAILS

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May 9, 2024

Phil Garthright, Senior Planner
Development Services
City of Coolidge
131 W. Pinkley Avenue
Coolidge, AZ 85128
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RE: Coolidge, Maricopa County; Coolidge 2035 General Plan Update; City of Coolidge; SHPO- 2023-1105 (174037)

Dear Mr. Garthright:

Thank you for continuing consultation with our office regarding the development of the *Coolidge General Plan 2035 – The Future Today* (the Plan). SHPO reviewed the draft Plan in accordance with Arizona Revised Statute (ARS) 9-461.06(D). We previously submitted formal comment (Klebacha [SHPO] to Garthright [Coolidge], September 22, 2023) during the public comment period encouraging the City to incorporate historic preservation as a component of the Plan.

The National Park Service approved Coolidge's application to become a Certified Local Government (CLG) on November 30, 2000. As you know, the CLG designation signifies that a municipality has entered into an agreement with the SHPO and the National Park Service and is committed to working collaboratively to fulfill the goal of preserving, protecting and increasing awareness of heritage resources. As one of 30 CLGs in Arizona, Coolidge is required to have a method to identify and designate historic properties to the City's register, have a historic preservation commission, and a historic preservation ordinance. The designation also includes institutional support for historic preservation, including noncompetitive grant funding. It is disheartening to see no reference to Coolidge's CLG status and historic preservation program in this document.

The Arizona SHPO sees a great deal of opportunity to partner with Coolidge to prioritize historic preservation in the future. Historic designations, such as listing on the Arizona and National Registers of Historic Places (ARHP/NRHP), offer opportunities for citizens to participate in property tax reduction programs for non-income-producing properties and a property tax incentive program for income-producing properties. Additionally, the Federal Investment Tax Credit Program authorizes a 20 percent investment tax credit coupled with accelerated depreciation for income-producing properties. Our office manages many of these programs and has additional information available on our website (<https://azstateparks.com/shpo>).

SHPO has the following comments regarding the draft Plan:

We were pleased to see that the City identified "...maintaining the historic character and architectural variety of the historic core," as a strategy for Goal 9, to "maintain and improve the existing affordable housing stock in the City and preserve the quality and appearance of the housing stock and overall environment of the community." Additionally, in Chapter 5: Growth Areas, the City committed to

identifying and conserving “any significant natural and cultural resources” and partnering with the Casa Grande Ruins National Monument and the Gila River Indian Community (GRIC) Tribal Government “...to discuss the potential impacts from development on important cultural resources.” We commend the City for these commitments and encourage you to build them into the goals, objectives, and strategies for implementing the Plan and to adopt ordinances for the identification, inventory, and assessment of prehistoric and historic archaeological resources and incorporate them into land use decisions.

We also recommend including other 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>.

SHPO has the following comments regarding the draft Plan:

1. Chapter 1: Introduction, Community History and Regional Setting:
 - a. The history is skewed to a Euro-American perspective. We recommend collaborating on this section with the GRIC Tribal Historic Preservation Office to build a more inclusive narrative.
 - b. We recommend referring to the “Pima Indians” by their traditional name, the O’odham, who are descendants of the Huhugam.
 - c. The O’odham name for the Casa Grande site is “Sivan Vahki.”
 - d. Please note that although the ancestral Huhugam no longer live at Sivan Vahki, they have inhabited the Gila River valley continuously from the Huhugam period into the present.
2. Generally, we recommend a copy edit of the Plan.
 - a. In particular, the introduction of terms and their acronyms or abbreviations is inconsistent throughout.
 - b. We also recommend adjusting the colors used in tables. They are very dark against the brighter design layout, which makes them harder to read.

State Historic Preservation Officer, Kathryn Leonard would like to set up a meeting with your office to discuss planning for the preservation of Coolidge’s historic resources, the City’s status as a CLG and opportunities to partner with the City to support historic preservation efforts. We also invite you to attend our statewide historic preservation conference to be held in Prescott, June 25-28th (see <https://www.azpreservation.org/conference>) Please feel free to contact me at cklebacha@azstateparks.gov or by phone at 602.542.7140 to make arrangements for the meeting or if you have any questions regarding this letter.

Sincerely,



Caroline Klebacha, M.A.
Archaeological Compliance Specialist
State Historic Preservation Office