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Border Colonias: Equity and Access in the Arizona State CDBG Set-Aside Program



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DISCLAIMER

The report was prepared in partial fulfillment of requirements for the Master in Urban and Regional Planning degree in the Department of Urban Planning at the University of California - Los Angeles. It was prepared at the direction of the Department of Urban Planning and in coordination with Southwest Fair Housing Council (SWFHC). The views expressed herein are those of the author and not necessarily those of Department of Urban Planning, UCLA Luskin School, UCLA as a whole, or Southwest Fair Housing Council.

ABSTRACT

Located along the entirety of the U.S.-Mexico border, Colonias are semi-formal communities that have historically lacked access to basic needs such as sufficient housing, access to potable water, and connection to broader infrastructure networks. In 1990, the National Affordable Housing Act mandated Set-Asides within the Community Development Block Grant (CDBG) for states where Colonias exist to fund infrastructure improvements. This report focuses on Colonias in the state of Arizona.

This report tracked demographic changes by comparing census tracts where Colonias are present and wider county information. This analysis focuses on Total Population, Age, Race, Ethnicity, Income, Education, and Housing.

With these findings, this report provides a detailed program analysis of CDBG Set-Aside implementation within Arizona.

Based on this research, this report provides four recommendations to improve the use of CDBG Set-Aside funding: creation of a Colonia resident application platform, ways to advance and stabilize housing opportunity, CDBG Set-Aside funding for healthy homes projects, Colonia project tracking requirement in equity plans as a part of new HUD guidelines.

NON-URBAN PROBLEMS

The U.S. - Mexico borderlands are a dynamic, distinct, and ever-changing geopolitical space. Along the border, semi-formal communities called "Colonias" are typified by lacking access to basic amenities, disproportionate rates of poverty, and overall economic insecurity. In 1991, a congressional fact-finding mission recognized these concerns. Following this, the Department of Housing and Urban Development, in coordination with the Department of Agriculture, established guidelines regarding Community Development Block Grant (CDBG) set-asides aimed at funding infrastructure development in areas identified as "Colonias." These areas exist along the entirety of the U.S.-Mexico border in Texas, New Mexico, Arizona, and California. HUD databases show approximately 2,008 recognized Colonia communities along the border.

Shameless subdividers capitalized on the lack of affordable housing opportunities by marketing undeveloped land with the promise of future improvements to infrastructure. Unregulated or relaxed planning standards facilitated these practices. The resulting communities and settlements continue without necessities like quality housing, sewage connections, or water improvements.

This lack of attention has led to extreme resident vulnerability and compromised long-term outcomes. In an article published in 1999, Ruth Davidhizar and Gregory Bechtel describe the living conditions for the Colonia community of Weslaco residents: "Seventy percent of the residents have no access to fresh water, sewage hookups, gas, or electric power. This development is primarily flat without a drainage infrastructure, and the unpaved roads flood frequently, swamping outhouses, cesspools, and primitive septic tanks."

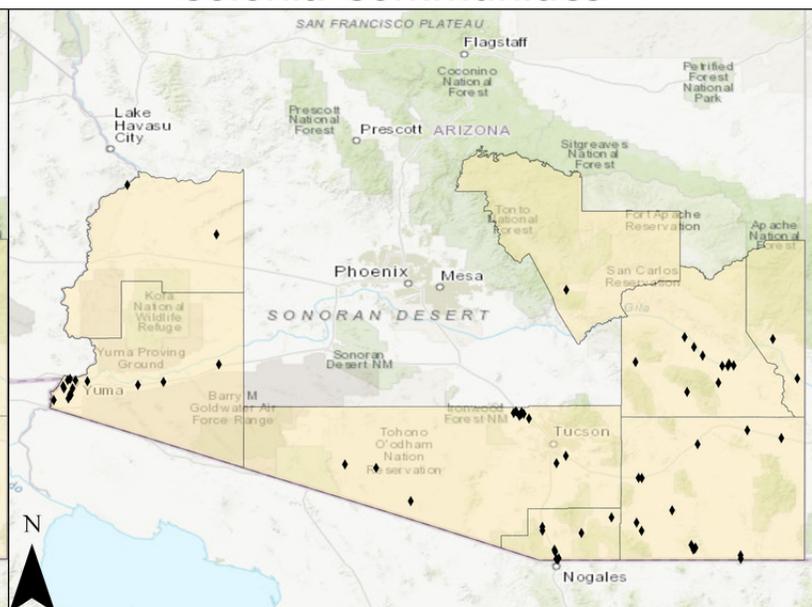
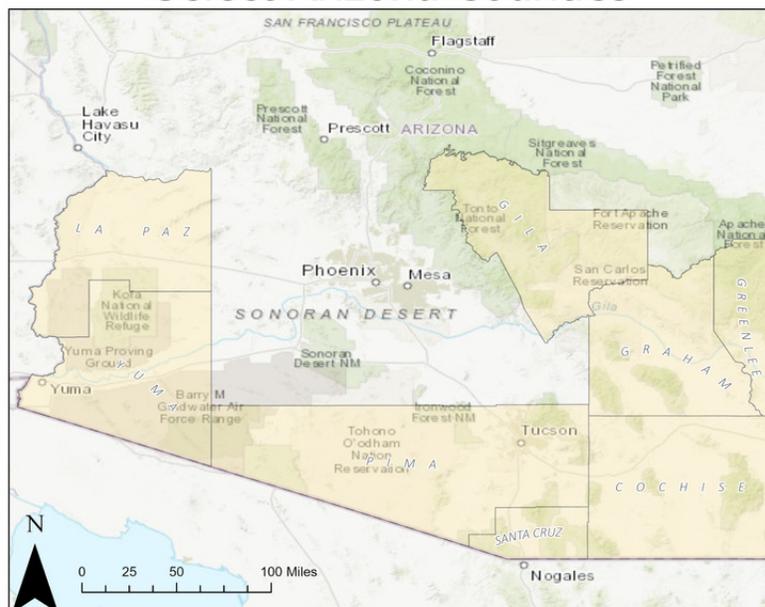
While Colonias exist along the entirety of the U.S.-Mexico border, this report will focus on Colonia communities within Arizona. As of 2023, 66 recognized Colonia communities are within county jurisdiction and tribal territories. These communities are in Cochise County, Gila County, Graham County, Greenlee County, La Paz County, Pima County, Santa Cruz County, Yuma County, Cocopah Indian Reservation, and the Tohono O'odham Nation. In 2021, approximately 130,000 Arizonans were living in Colonias.

Colonia communities were created through the practice of "Wildcat Subdivisions." In both the legal and illegal context, this practice allows property owners to split the land up to five times before triggering local land-use regulations. Unlike Texas, New Mexico, or California, Wildcat subdivision was the development norm throughout Arizona. Most Colonia communities in Arizona were created when large-scale land buyers utilized legal loopholes to sell unimproved land with the promise of future infrastructure development.

Despite more than thirty years of direct aid, Colonias in Arizona continue to lack the most necessities; the plight of these communities is virtually unknown. This study conducted a robust demographic analysis to further comprehensive research of Colonia communities and provide outcome-based recommendations. This investigation tracked changes in Colonia population, Age, Race, Ethnicity, Income, Education, and Housing.

Select Arizona Counties

Colonia Communities



Accompanying demographic findings, this study provided an overview and critique of Arizona's Community Development Block Grant (CDBG) implementation. Despite having the second-highest number of Colonia communities, the use of CDBG funding has not been sufficient. Furthermore, this analysis revealed severe disparities between Incorporated and Unincorporated jurisdictions; Colonias are left behind without support from a local government or proactive county administration. Moreover, state and local jurisdictions must address the glaring Fair Housing concern Colonias present. This research is significant considering new Affirmatively Furthering Fair Housing regulations.

This report relied upon these findings to provide four steps to enhance efficiency and equity in CDBG Set-Aside funding within Arizona. First, the state must allow and encourage individual applications from Colonias residents. As many of these areas lack capacity, assisting individual residents in applying would create a funding mechanism of high impact. Second, the state must expand efforts to expand housing opportunities in all aspects. Current funding metrics indicate there is minimal expenditure on housing acquisition or rehabilitation.

Furthermore, the state must seek to expand opportunities in non-traditional housing models such as land trusts or Tenancy in Common. Third, the state must undertake climate change and heat mitigation work within these communities. Colonias will be disproportionately affected by climate change, and efforts must be made to lessen this environmental burden. Concerning impending HUD rule changes, the state must mandate Colonia project tracking be included within Equity Plans as a part of HUD-required Consolidated Plans. As the ultimate goal of this funding is alleviating Colonia conditions, the state must require local jurisdictions to submit documentation that they are actively seeking to respond to the needs of Colonia residents.

COLONIA DEMOGRAPHIC STUDY

METHODOLOGY

Unfortunately, there has been limited research regarding the existing demographic makeup of Colonias communities.

This report will use demographic data to evaluate historical trends and outcomes for Colonia residents. This study utilized Census Data (1990, 2000, 2010) and ACS 5-Year Estimates (2010 and 2021). This information is presented in comparative tables and visualized using GIS software.

To best track changes and outcomes within Colonias communities, this study leveraged data sources at the Census tract level. This study compared information between tracts that contained one or more Colonia communities and broader county information. This information has spatially accounted for census tract changes due to census redraws.

TOTAL POPULATION

Since 1990, there have been various changes within County and Colonia populations. All counties containing a Colonia community have seen dramatic increases in total population in the last 30 years. This increase mirrors population booms across all the Sun Belt states.

PERCENT CHANGE IN TOTAL POPULATION (1990-2021)

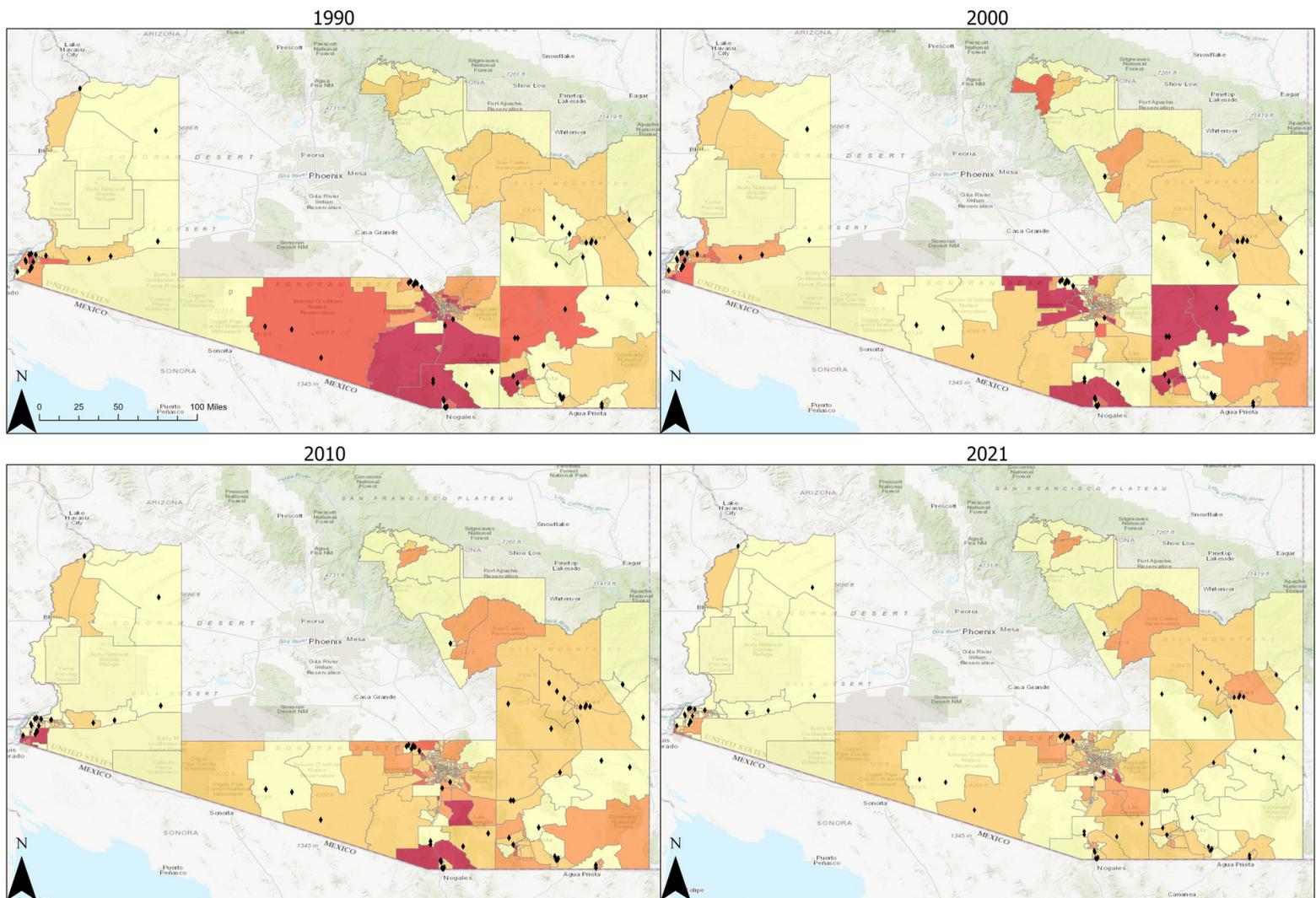
County	Colonia Count	County Change	Colonia Change
Santa Cruz County	10	60.63%	-45.07%
Pima County*	13	56.46%	-0.68%
Cochise County	16	28.50%	-33.74%
Greenlee County	2	19.42%	-17.45%
Graham County	10	45.11%	104.81%
La Paz County	2	19.60%	-14.09%
Gila County	1	32.46%	55.02%
Yuma County*	14	90.73%	-46.33%
Total	68	55.44%	-22.90%

*Colonias located in Tribal Jurisdictions have been included in these counties

Despite dramatic increases in all counties containing a Colonia community, most Colonias have seen substantial decreases in the total population; Graham and Gila County have seen increases in Colonia populations since 1990. In total, Colonias have lost a large portion of the total population.

These findings suggest that long-term residents are relocating away from their historic communities, and new residents are not moving into Colonia-designated communities. Results provide insight into a "gutting" of the population within most Colonia communities. However, further research will be needed to analyze the correlation between census tracts where Colonias are present and neighboring tracts.

Total Population Select Counties



AGE

Despite overall decreases in the total population of Arizona Colonias, there are significant findings concerning the age of Colonias residents.

These findings reveal that Colonias are experiencing similar shifts in age compared to wider counties. However, Colonias have experienced an increased population in the 35-64 and 65+ categories.

PERCENT CHANGE IN AGE (1990-2021)

Age Group	County Change	Colonia Change
Under 18	-18%	-20%
18-34	-15%	-10%
35-64	6%	8%
65+	45%	51%

While further research is needed, this evidence would suggest that as Colonia populations age, there will be fewer children and "working-age" residents. This decline could be due to several economic and social factors.

However, Colonias continue to have a higher senior population when compared to wider counties.

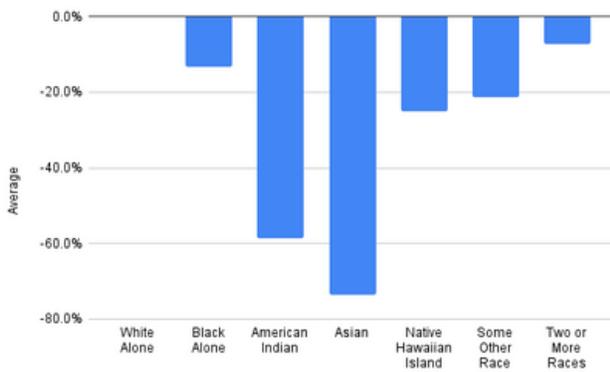
These diverging statistics are concerning for the long-term care and health of seniors living in Colonias communities. As younger generations are more likely to move away from Colonias, older residents could be left without a primary caregiver. As many areas are geographically isolated or lack access to a health system, seniors would be at even higher risk.

RACE AND ETHNICITY

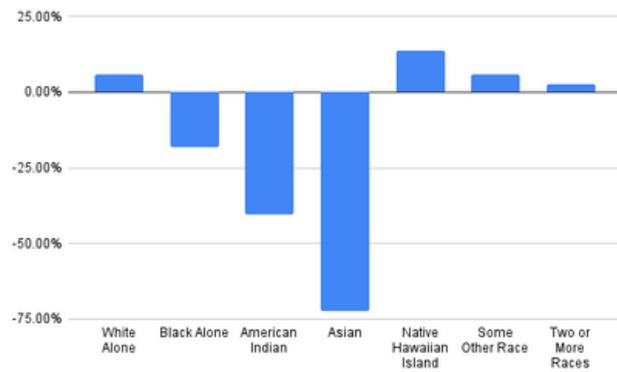
Historically, Colonias have been sites of racial segregation. Developers, and land owners, utilized a development tool known as "Wildcat Subdivision," in both the illegal and legal context, to generate land. Unimproved parcels of land were heavily marketed to low-income and communities of color within Arizona.

This table demonstrates differentials between Colonia communities and broader county demographics. A differential of 0.00% would indicate a population subset in Colonias is identical to the larger county population. For example, the population of Colonia residents identifying as Asian: Not Hispanic or Latino is approximately 70% smaller than the broader county population. Despite overall decreases in Colonia populations, residents are more likely to identify as a person of color or Hispanic or Latino.

DIFFERENTIAL NOT HISPANIC OR LATINO



DIFFERENTIAL HISPANIC OR LATINO



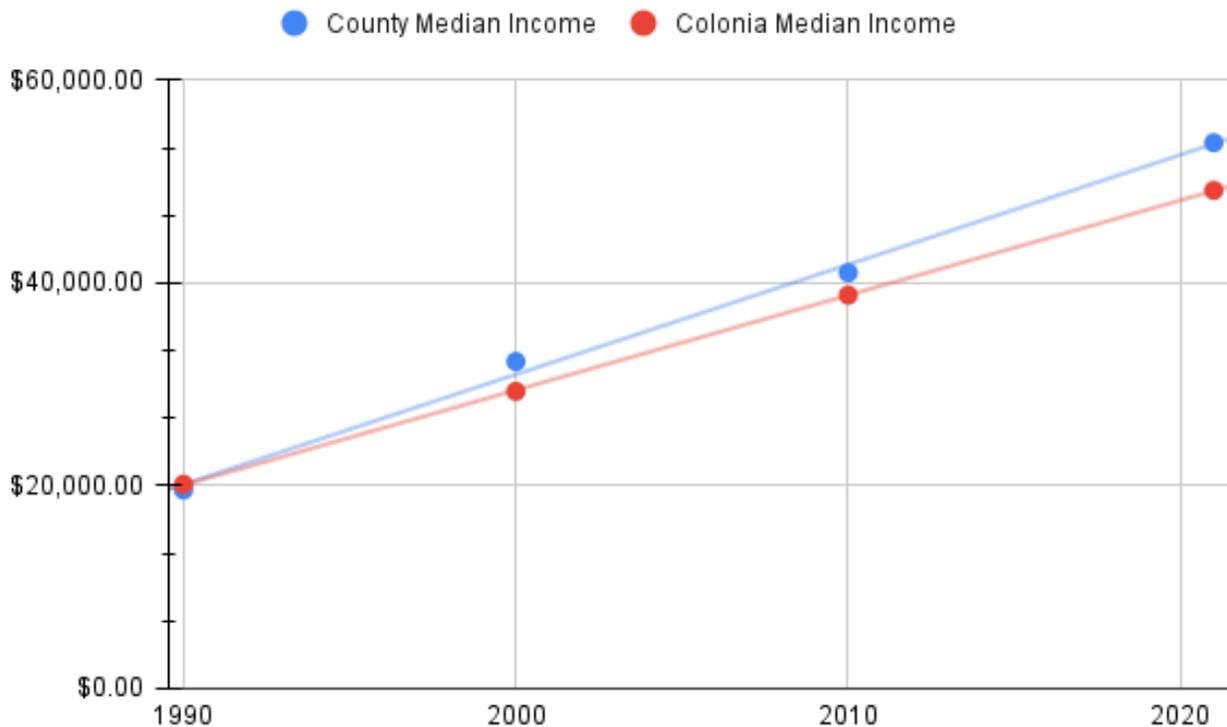
Furthermore, these findings reveal that Colonias are becoming more racially and ethnically diverse. A higher percentage of the population identifies as Black Alone, Two or More Races, or Hispanic or Latino.

Considering historic segregation within Colonias communities, and long-term outcomes, Colonias communities may become sites of continued racial and ethnic segregation in urban or rural areas. It is imperative to acknowledge these barriers and provide support to address the legacies of exclusion.

INCOME

Colonias have continued to see harmful economic disparities compared to the respective counties. This section utilizes averages of Median Household Income data from the 1990 and 2000 Census, along with ACS 5-Year Estimates for 2010 and 2021.

AVERAGE MEDIAN INCOME COUNTY VS COLONIA (1990-2021)



The chart highlights the continuing economic disparity between Colonias and the broader county.

In 1990, many Colonia communities had a relatively diverse range of incomes. As a whole, Colonias has a Median Household Income that was 2.96% higher than wider county Median Household Incomes. Furthermore, the disparity between Colonias and the broader county Median Income is increasing.

Since 1990, Median Household Income in almost all Colonias, except for Greenlee County and Graham County, has seen a tremendous stagnation or loss. For Colonia communities in Pima County, Median Household Income is 20.3% lower than the broader county income.

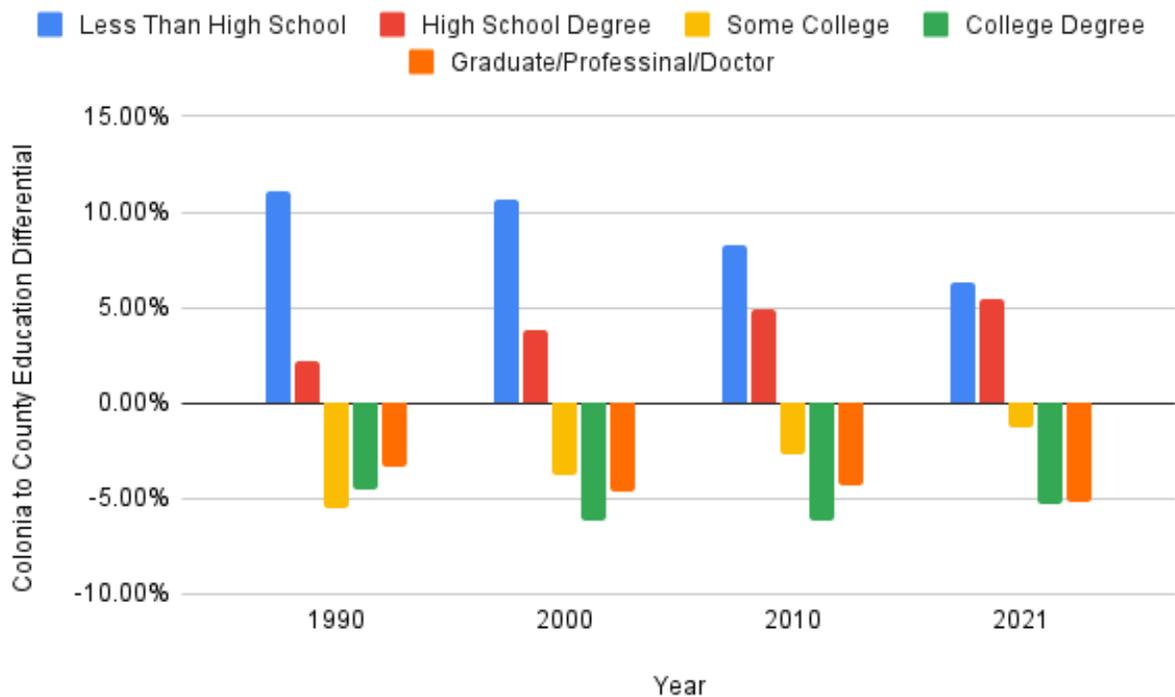
Within this analysis, Pima County demonstrates an alarming metric. Pima County has the second-highest population in Arizona and is a highly urbanized area in the Tucson-Nogales MSA. Despite the growing population within the county and relocating industry sectors to the Sunbelt since the early-1990s, the value of increased economic output is not seen by Colonias residents.

Between 1990 and 2021, the Median Household Income for Colonias in Arizona is 10.87% lower than wider county incomes.

EDUCATION

Access to education continues to be the most significant barrier for Colonias residents. Utilizing data for the Highest Educational Attainment for the population 25 years and up, it is evident that Colonia communities continue to be locations of educational inequity.

HIGHEST EDUCATIONAL ATTAINMENT DIFFERENTIAL (1990-2021)



The findings are compared using a metric called the "Colonia to County Differential." This equation measures the difference between the highest educational attainment in wider counties and individual Colonias. A differential of 0.00% would indicate highest educational attainment in Colonias is identical to the larger county population.

There are two distinct findings regarding educational outcomes.

Since 1990, the population with the highest educational attainment of "Less than High School" has dramatically decreased. The steady increase in the number of people with a High School diploma mirrors this decrease. The percentage of residents within Colonias communities with a High School diploma is more significant than the general county.

However, access to higher education in Colonias continues to lag behind the wider county population.

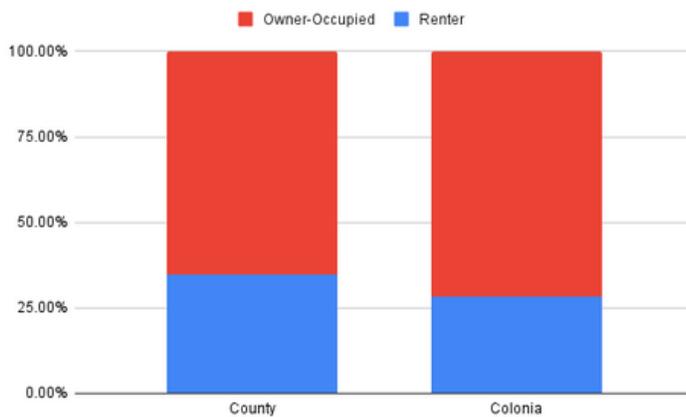
While the number of Colonia residents with some college has increased, Colonias are still far behind general county populations. Since 1990, Bachelor's and Graduate/Professional degrees have remained inaccessible to Colonia residents.

HOUSING

Housing inequality and insecurity have continued to plague Colonias communities.

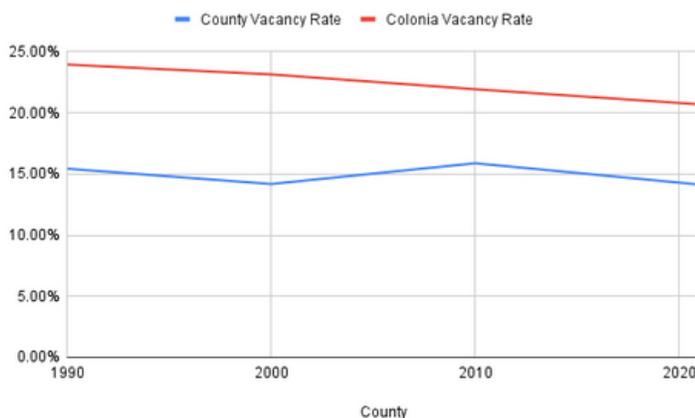
Since 1990, Colonia communities have seen higher vacancy rates than the wider county. Despite slightly declining rates (a total decline of -3.25%), Colonias have a disproportionately higher vacancy. On average, housing vacancy is 7.52% higher in Colonias than in the broader county from 1990-2021.

AVERAGE HOUSING TENURE (1990-2021)



Colonia communities see a lower percentage of renters when compared to the broader county. From 1990-2021, the rate of renters in Colonias is 6.52% less than in wider counties; the history of Colonias corroborates this finding.

VACANCY RATE (1990-2021)



All Colonias are locations with higher homeownership rates compared to county percentages. However, this metric does not provide any correlation to increased economic outcomes related to homeownership; Colonias residents are not more prosperous due to high homeownership rates.

COLONIAS AS SITES OF CONTINUED SEGREGATION

These findings demonstrate that Colonias continue to have disparate income, education, and housing outcomes. These findings further conclude that Colonias are sites of racial/ethnic and age-related segregation compared to wider county totals.

This disparity is particularly alarming considering the substantial population loss compared to the broader population boom throughout selected Arizona counties. Despite occasional outliers, this "gutting" of the total Colonia population is evident in all Colonias.

However, these findings conclude that Colonias communities persist as sites of high racial and ethnic segregation compared to wider counties. The total Colonia population is more likely to identify as Hispanic or Latino. While these increases correspond to wider county demographic fluctuations, considering other adverse outcomes, state and local stakeholders must address this.

Furthermore, these findings reveal the adverse outcomes concerning education and economic opportunity. From 1990-2021, the Median Household Income of Colonias was substantially lower than in the broader county.

These outcomes are reflected further in access to educational opportunities. While Colonias have seen a reduction in the total population with less than a high school degree, higher education remains out of reach for most Colonia residents.

Colonias residents have higher rates of homeownership when compared to the respective counties. This high rate of homeownership does not indicate any advantage Colonia communities have. These findings simply confirm historical narratives. However, these findings are crucial for implementing and impacting federal funding for residents.

Due to these social determinants for Colonias residents, state, county, and local jurisdictions must undertake work to prevent Colonias from becoming sites of continued segregation.

CDBG INTRODUCTION

The Community Development Block Grant (CDBG) is a HUD-administered program for housing and infrastructure-related projects. The program was created in 1974 to fund HUD projects despite a previous federal funding moratorium. The Cranston-Gonzalez National Affordable Housing Act of 1990 revised and expanded this program.

There are two allowable recipients of CDBG funding, entitled and non-entitled jurisdictions.

Each year, both entitled jurisdictions and non-entitled areas receive an allocation of CDBG funding based on community need, percentages of poverty, housing overcrowding, age of housing, and population growth compared to other jurisdictions.

From this allocation, local governments or states administer the funding program.

There are stringent requirements to utilize CDBG funding for housing and infrastructure projects. Eligible activities are:

- Acquisition of Property
- Resident Relocation and Demolition
- Rehabilitation of Residential and Non-Residential Structures
- Construction of Public Facilities and Improvements
- Public Services
- Activities for Energy Conservation
- Business Assistance for Economic and Workforce Development

Following a congressional fact-finding mission to the border states, legislators realized the dire need for targeted funding to alleviate Colonia conditions in the Borderlands region. Section 916 of the National Affordable Housing Act of 1990 mandated “set-asides” of each state’s total CDBG allocations. This law specified that states may utilize up to 10% of state CDBG allocations.

Federal Agencies (HUD and USDA Rural Development) created the characteristics for communities to receive Colonia Set-Aside funding.

1. Must be located in Arizona, California, New Mexico, or Texas.
2. Must be located in the “United States-Mexico border region,”; a recognized buffer of 150 miles north from the physical border.
3. Inadequate services must exist: Lack of potable water, lack of access to sewage systems, and lack of decent, safe, and sanitary housing.
4. Evidence of existence before the enactment of the 1990 National Affordable Housing Act.

However, Colonia “designation” is determined by the individual states.

CDBG COLONIA SET-ASIDES IN ARIZONA

The Arizona Department of Housing (DOH) manages Colonia Set-Aside funding. This funding is allocated to the Arizona Non-Entitlement pool. In 2008 Arizona drastically reorganized the methods to disburse and administer CDBG funding for Colonias.

From 1991-2008, the process relied exclusively on county resolutions or petitions from one of the four councils of government. In response to HUD reporting mandates, Arizona instituted a competitive application process for Colonia set-aside funding, which is managed by the Arizona Department of Housing (DOH). These changes allowed Colonia communities to address all water, sewer, or housing issues within one funding application.

To receive Arizona Colonia Set-Aside funding, additional guidelines regarding eligible activities exist. These activities are outlined in Section 6 of the Arizona State CDBG Application Handbook. These activity descriptions are:

- Substantial Housing Rehabilitation
- Water Infrastructure construction
- Sewer Infrastructure or Sewer Connections under Housing Rehabilitation
- Planning for Wastewater improvements
- Planning for Potable Water Delivery improvements.

CDBG SET-ASIDE FUNDING IN ARIZONA (2000-2021)

Eligible Activity	Funding FY200-2021
Street Improvements	\$8,503,423.66
Water/Sewer Improvements	\$7,479,300.39
Rehabilitation: Multi-Unit Residential	\$134,000.00
Flood and Drainage Facilities	\$869,351.83
Clearance and Demolition	\$186,208.00
Other Public Improvements Not List in 03A-03S	\$1,594,021.88
Total Utilized Funding	\$18,766,305.76
Total Available Colonia Funding	\$23,741,534.20
Percent Funding Used	79.04%
Unused Funds	\$4,975,228.44

*Funding Data for 2015 was not available

These amounts may be overestimated due to lack of public information regarding “Other Public Improvements Not Listed in 03A-03S” category.

INCORPORATED VS UNINCORPORATED DISPARITIES

Findings have revealed a severe bifurcation between incorporated and unincorporated communities. Specifically, incorporated towns and communities have received a vast majority (<90%) of total Set-Aside funding since 2000.

This disparity can be attributed to capacity and jurisdictional barriers to accessing CDBG set-aside funding. In an incorporated area, staff members are available to file applications for funding to Arizona DOH. This capacity availability is apparent in historic funding trends in small incorporated cities (Sierra Vista and Wilcox), where there are considerable spikes in the completion of CDBG-funded projects.

There is an apparent lack of CDBG investment for communities in unincorporated county areas. Counties are not prioritizing Colonia communities or are unaware this funding is available.

This outcome is highly concerning regarding alleviating Colonia conditions throughout the state Colonias existing in areas without any relevant staff or organization capacity may be left behind. This contrasts areas with some form of government/nonprofit body, which can file applications for this funding.

If not remedied, the disparities between unincorporated and incorporated Colonias will grow and worsen Colonia conditions.

FAIR HOUSING CONSIDERATIONS

Enacted in 1968, the Fair Housing Act prevents discrimination in housing against Race, Color, National Origin, Religion, Sex (Including gender identity and sexual orientation), Familial status, and Disability. These identifiers are labeled “protected characteristics.”

Within this act, HUD requires recipients of federal funds to offer methodologies that “Affirmatively Further Fair Housing.” This section means recipients of HUD funding must “...take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

Unfortunately, the vagueness of this rule has made implementation and enforcement difficult.

However, the Biden administration and HUD leadership have issued a Notice of Proposed Rulemaking (NPRM) regarding federal AFFH implementation. This proposed rule change would build upon the 1968 Fair Housing Act and a 2015 AFFH update.

Additional augmentation of AFFH provisions would include:

- Creation and Submission of an Equity Plan - containing fair housing analysis, goals, and strategies.
- Incorporation of Fair Housing goals from Equity Plans into planning documents (Consolidated Plans, Annual Action Plans, Public Housing Agency (PHA) plans)
- Yearly progress reports, submitted to HUD to evaluate steps to Affirmatively Further Fair Housing.
- Undertaking community engagement and participation work with historically underserved groups.

HUD, in this proposed rule, recognizes federal recipients’ diverse needs and capabilities. HUD will provide additional time, technical assistance, and open data platforms for smaller jurisdictions.

If adopted, these proposed changes would positively impact communities nationwide and address legacies of harm or exclusion.

COLONIA SET-ASIDES: THE FINAL GOAL

As this report has demonstrated, Colonias in Arizona have continued to be sites of economic insecurity and segregation which have affected the long-term outcomes of residents.

It is imperative to recognize these issues to achieve equitable utilization of CDBG funds to remedy institutional barriers.

However, CDBG Set-Aside funding and Colonias themselves are unique within this framework.

Colonias Set-Aside funding was created to provide a mechanism to remedy substandard housing and infrastructure issues. Each year funding should be decreasing as Colonias receive these improvements. This has not been the case.

The final goal of this work should be the elimination of Colonia conditions.

Investments in housing and infrastructure should decrease the number of communities classified as Colonias.

While it is a crucial facet of the program to allow additional areas to file for Colonia status, there must be tangible steps taken by the state as a recipient of this funding to ensure communities with longstanding position receive the funding and improvements they need.

RECOMMENDATIONS

The following recommendations rely on the demographic and programmatic research within this report. Furthermore, these recommendations leverage HUD CDBG Memorandum (between 1990-2008) regarding CDBG implementation by recipients. While not formal legal precedent, the context and responses of these memoranda can be applied to Colonia CDBG funding and Fair Housing regulations.

Creation of a Colonia Resident Application Platform

Arizona must create a mechanism allowing individuals, neighborhoods, small unofficial community organizations, and townships to apply for this funding.

This tool, or webpage, would connect Colonias residents with local construction/rehabilitation companies, water infrastructure installation firms, and other relevant organizations. CDBG funding could provide direct payments to these contractors for the work performed.

A 1991 CDBG Memo in Marin County supports this recommendation. The memo responded to a private citizen's request to use CDBG funding to repair an owned structure.

Many Colonia communities do not have access to robust planning or development networks within specific areas. As seen in CDBG Findings, there are severe differences in funding between incorporated and unincorporated jurisdictions.

To prevent the continued divide between these areas and alleviate dangerous conditions for Colonias residents, the state must create, or mandate creation at the county level, of a tool for individuals, or small-scale unofficial groups, to apply for this funding.

To achieve this recommendation efficiently and equitably, the state should create a user-friendly online platform; services should accompany this via phone or mail. Albeit an international example, the private swelling rehabilitation funding portal for Vienna, Austria, provides a fantastic blueprint for a Colonia funding individual application.

Advancing and Stabilizing Housing Opportunity

From inception, Colonia Set-Asides seek to advance access to safe, sanitary, and stable housing. As residents of Colonias may be subject to adverse long-range outcomes from social and institutional barriers, CDBG Set-Aside funding must be aimed at securing and advancing housing tenure, whether through individual ownership or removal of land from an unsafe housing market.

This recommendation can be accomplished at a wider community and individual levels.

Homeownership Programs: Arizona must make adequate investments to promote and stabilize individual homeownership programs. Programs for new owners could take the form of loan subsidies, down payment assistance, and other formats.

Colonias are sites of high homeownership rates, so the state must assist Colonia residents in accessing federal funding. CDBG funding allows for applications for privately owned dwellings, and these programs should be used to rehabilitate existing owned properties.

Land Trust and Alternative Models: As several capacity-related barriers to funding impact these communities, Arizona should seek to partner with organizations that provide alternative models to the traditional homeownership or rental market. Community Land Trusts or Self-Help Housing organizations can offer a non-traditional approach to stabilize and empower residents of Colonias.

CDBG Set-Aside Funding for Healthy Homes Projects

Colonias, while sites of intense housing insecurity, are also areas of compromised health outcomes due to a lack of potable water, sewage, or economic and educational opportunities. These negative determinants are exacerbated by climate change and increasing health risks concerning pollution, heat, and extreme weather events.

CDBG Set-Aside funding must include provisions and priority to undertake Healthy Homes work in Colonia communities. This work includes heat/cold mitigation measures, community cooling centers, and lead paint remediation.

Further supported by CDBG Memos, projects could involve weatherization or A/C installation and, specifically, the construction of local parks or cooling centers. The state of Arizona should encourage and support this type of work.

Colonia Work Tracking Requirement in Equity Plans

The state of Arizona must implement rule changes to track and evaluate county effectiveness and local jurisdictional capacity to alleviate Colonia conditions.

CDBG Set-Aside funding has existed for over 30 years within the state of Arizona, yet there have been slow steps to alleviate Colonia conditions. The state of Arizona, and the Arizona Department of Housing, have an imperative to seek opportunities to assist residents in Colonia communities actively. This mandate is reflected in all iterations of the AFFH guidelines. As sites of entrenched and continuing segregation, the Arizona Department of Housing must mandate progress in Colonias efforts be included as a part of Equity Action plans that are submitted by County jurisdictions within their Consolidated Plans.

To achieve this goal, the state must require individual counties and jurisdictions to provide evidence and timelines for activities related to Colonias' work. This will assist in the utilization and competition for Set-Aside funding and prioritize communities where little result has been achieved; the state can provide more pronounced Technical Assistance to communities lacking any CDBG Set-Aside investment.

NON-PROFIT COMMUNITY

Colonia communities in Arizona have long been sites of economic hardship, institutional disenfranchisement, and segregation. This study identifies the demographic and economic disparities between Colonia communities compared to broader county populations. This investigation concludes the Colonia communities are drastically losing population. In all, residents of Colonias experience an array of negative determinants compared to broader county populations:

- An aging population
- Racial and ethnic segregation
- Substantially lower incomes
- Lack of access to education

To remedy these past harms, state and local agencies must seek to implement the recommendations utilizing CDBG Set-Aside funding.

It is important to note these communities have persisted and flourished despite these pressures. These are neighborhoods of extended families and friends. Care and attention must be given to existing Colonias to implement these policies better. While the goal of Colonias funding should be the alleviation of Colonia conditions, it is not the goal to demolish the existing community fibers or displace historic residents.

This investigation will be used as an initial primer on Colonias within Arizona and as a reference for the effective and equitable implementation of CDBG Set-Aside funds.

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