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BOOK NOTE

Integrating the "Underclass": Confronting America's Enduring Apartheid

Olati Johnson*

AMERICAN APARTHEID: SEGREGATION AND THE MAKING OF THE UNDERCLASS. By Douglas S. Massey† & Nancy A. Denton.‡ Cambridge, Mass: Harvard University Press. 1993. 292 pp. \$14.95.

Douglas Massey and Nancy Denton's American Apartheid argues that housing integration has inappropriately disappeared from the national agenda and is critical to remedying the problems of the so-called "underclass." Reviewer Olati Johnson praises the authors' refusal to dichotomize race and class and the roles both play in creating and maintaining housing segregation. However, she argues, Massey and Denton fail to examine critically either the concept of the underclass or the integration ideology they espouse. Specifically, she contends, the authors fail to confront the limits of integration strategies in providing affordable housing or combating the problem of tokenism. Massey and Denton also fail to explain why, given the intractability of racism, they believe integration is more likely to be successful or politically viable than economic investment in inner cities. Ms. Johnson concludes that the book's proposals would not aid most poor African Americans.

In recent years, liberal and conservative scholars alike have argued that race-specific policies such as antidiscrimination laws and affirmative action are ineffective methods for improving the plight of persistently poor African Americans.¹ To many critics, the civil disturbances in Los Angeles following the acquittal of the police officers charged with beating Rodney King demonstrated the immense frustration of the "underclass": the people the civil rights revolu-

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1. I use "African American" interchangeably with "black" to refer to Americans of African descent.

tion left behind.² The civil disturbances sparked calls by policymakers and community leaders not for greater enforcement of race-specific civil rights laws to counteract discrimination, but rather for enterprise zones and other space-specific³ and class-specific remedies to rebuild economically depressed inner cities.⁴ Similarly, President Clinton has emphasized need-based, race-neutral policies to aid poor and working-class African Americans, arguably avoiding the divisive issue of race.⁵ Even many civil rights leaders who seek to challenge persistent racism in our society have called for a reevaluation of traditional civil rights strategies. For example, Professor Derrick Bell has questioned whether traditional civil rights litigation can address the fundamental racism and classism that pervade American society, and whether civil rights laws have offered any real benefit to poor African Americans.⁶

2. *The American Underclass*, a 1977 *Time* magazine article, provoked widespread awareness and debate of the concept of "underclass." The article described residents of inner cities in terms of pathological behaviors such as drug addiction, crime, teenage pregnancy, and high unemployment, rather than in terms of their poverty. See Michael B. Katz, *The Urban "Underclass" as a Metaphor of Social Transformation*, in *THE "UNDERCLASS" DEBATE: VIEWS FROM HISTORY* 3, 4 & n.2 (Michael B. Katz ed., 1993). The term "secured its dominance in the vocabulary of inner-city pathology" with the release of Ken Auletta's book *The Underclass*. See *id.* at 4. Auletta defined the "underclass" as a permanent minority consisting of: (1) the passive poor (long-term welfare recipients); (2) hostile street criminals; (3) hustlers; and, (4) the traumatized (including "drunks," the homeless, and the mentally impaired). KEN AULETTA, *THE UNDERCLASS* xvi (1982).

Like Michael Katz, I use the term to capture the social transformation described by William Julius Wilson. See Katz, *supra*, at 22. William Julius Wilson describes the "underclass" as those whom the civil rights movement "left behind." WILLIAM JULIUS WILSON, *THE TRULY DISADVANTAGED: THE INNER CITY, THE UNDERCLASS, AND PUBLIC POLICY* 7-8 (1987). He argues that terms like "lower class" and "working class" do not adequately convey that the poor who currently live in urban neighborhoods "are collectively different from those that lived in these neighborhoods in earlier years." *Id.*; see also text accompanying note 18 *infra*. I use the term critically, however (often I place it in quotes), because the term typically reflects superficial judgments about the cultural and social values and behavior of poor African Americans, rather than concern about urban poverty. See note 83; text accompanying notes 95-102 *infra*.

3. Space-specific programs are those limited to particular geographic communities. The concept of "space" is critical to an understanding of the underclass, because the underclass is defined not only by poverty and behavior but by the habitation of a particular geographic (urban) space. See Thomas J. Sugrue, *The Structures of Urban Poverty: The Reorganization of Space and Work in Three Periods of American History*, in *THE "UNDERCLASS" DEBATE: VIEWS FROM HISTORY*, *supra* note 2, at 85 (examining industry and poverty in Detroit).

4. See John C. Weicher, *The Policy Implications of the Spatial Mismatch Hypothesis: Comment on "Deconcentrating The Inner City Poor,"* 67 *CHI.-KENT L. REV.* 855, 858-60 (1991); Jean Dimeo, *Fiddling While the Country Burns*, *AM. CITY & COUNTY*, July 1992, at 12, 12; Vic Pollard, *Los Angeles Struggling for Inner City Jobs*, *Gannett News Service*, Apr. 25, 1993, available in *LEXIS*, News Library, GNS File; Susan Yoachum, *Clinton Revisits L.A. Riot Site, Announces Plan to Aid Cities*, *S.F. CHRON.*, Sept. 17, 1992, at A5.

5. See Clarence Page, *A Presidential Paradox on Civil Rights*, *HOUS. CHRON.*, Dec. 30, 1993, at A28; Yoachum, *supra* note 4.

6. See DERRICK BELL, *AND WE ARE NOT SAVED: THE ELUSIVE QUEST FOR RACIAL JUSTICE* 52-55, 59-74 (1987). Bell, in critiquing civil rights litigation, points out the inadequacy of litigation as a means to remedy race and class subordination. See, e.g., *id.* at 71 (Bell's fictional character Geneva Crenshaw asks, "How long should we be kept, by continued reliance on litigation, from attacking the real causes of our subordinate status?"). Bell also questions whether civil rights legislation and remedies can improve the economic situation of poor African Americans. See *id.* at 121-39 (offering a fictional chronicle of reparations to African Americans as an alternative to civil rights laws that have failed to address the problems of poor blacks). Unlike William Julius Wilson, Bell suggests racism keeps the African American underclass persistently poor. See *id.* at 162-65; see also notes 18-21 *infra* and accompanying text (explicating Wilson's position). For this reason, Bell criticizes the equal protection doctrine's emphasis

These criticisms of race-based remedies have evolved in part from the paradox inherent in the existence of persistently poor African Americans at a time when African Americans have achieved formal legal equality. Sociologist William Julius Wilson believes that this paradox suggests the limits of race-specific remedies. Wilson argues that although such remedies have helped some African Americans by assuring formal legal equality, they are increasingly irrelevant in addressing the economic problems of those who have nevertheless remained poor.⁷

For Wilson, explaining this paradox of persistent poverty involves bifurcating race and class, as well as past and present discrimination. Thus, the debate has focused on the question of whether it is contemporary racism or contemporary classism that perpetuates the underclass. This question itself finesses the complex interplay between racism and classism. In *American Apartheid: Segregation and the Making of the Underclass*, Douglas Massey and Nancy Denton challenge this bifurcation of race and class and of present and past discrimination, arguing that contemporary racism shapes housing markets and plays a major role in both creating and perpetuating a black underclass.

Massey and Denton's theory adds a chapter to the ongoing public debate about why (and in fact whether) an African American "underclass" truly exists, and (if it does) what roles race, class, and culture play in maintaining it.⁸ In the early 1960s, Oscar Lewis published a series of socioeconomic studies on Mexican Americans and Puerto Ricans, arguing that poverty in those communities resulted from a self-perpetuating culture that permitted passing behavior inimical to mainstream success from generation to generation. Although Lewis contended that this "culture of poverty" resulted from the economic and social marginalization of the very poor,⁹ some liberal critics viewed his description of a self-perpetuating oppositional culture as blaming the victim.¹⁰ In 1965, Assistant Secretary of Labor Daniel Patrick Moynihan authored a report documenting the intergenerational transmission of poverty in African American families. The resulting *Moynihan Report* stressed the disintegration of the black family as the cause of persistent poverty.¹¹ Although the *Moynihan Report* did not refer to Lewis' culture of poverty theories, Moynihan's rhetoric of

on facial discrimination and discriminatory intent, claiming the doctrine is inadequate to address modern, "facially neutral, social and economic legislation [that] wreak[s] havoc on blacks because of their past deprivation." *Id.* at 175.

7. WILSON, *supra* note 2, at 109-18.

8. For a review of the dominant theories of the underclass since the 1960s, see *id.* at 3-19.

9. Oscar Lewis, *The Culture of Poverty*, in *ON UNDERSTANDING POVERTY: PERSPECTIVES FROM THE SOCIAL SCIENCES* 187, 188 (Daniel P. Moynihan ed., 1968).

10. See WILLIAM RYAN, *BLAMING THE VICTIM* 119-20 (2d ed. 1976). For a general discussion and critique of culture of poverty theories, see MICHAEL B. KATZ, *THE UNDESERVING POOR: FROM THE WAR ON POVERTY TO THE WAR ON WELFARE* 16-43 (1989).

11. See DANIEL PATRICK MOYNIHAN, *THE NEGRO FAMILY: THE CASE FOR NATIONAL ACTION*, reprinted in LEE RAINWATER & WILLIAM L. YANCEY, *THE MOYNIHAN REPORT AND THE POLITICS OF CONTROVERSY* 39, 43, 51-60 (1967).

a "tangle of pathology" bore some resemblance to Lewis' earlier theories.¹² As a result, many African American leaders and white liberals criticized the report as demeaning to African Americans.¹³ The Moynihan controversy led, at least, to liberals' rejection of culture of poverty theories.¹⁴ Wilson contends that to avoid the label of racist, some liberals in the 1970s refrained from studying any behavior among inner-city residents that might be construed as "unflattering or stigmatizing."¹⁵

Unlike the liberal theorists, conservatives eagerly embraced culture of poverty arguments and used them to dominate the public discourse on the underclass during the 1980s. For example, Charles Murray argued in *Losing Ground* that Great Society programs such as Aid to Families with Dependent Children had actually created perverse incentives for low-income individuals instead of lifting them out of poverty.¹⁶ According to Murray, welfare programs reduced recipients' incentives to work and contributed to the destruction of traditional two-parent families. As nuclear families disappeared and work incentives decreased, the pathological behaviors of long-term welfare dependency, unemployment, crime, drug use, and violence increased among poor African Americans.

William Julius Wilson offered a liberal response to Murray and other conservative poverty theorists in his 1987 book, *The Truly Disadvantaged: The Inner City, the Underclass, and Public Policy*. According to Wilson, structural changes in the American economy, rather than Great Society programs, caused the growth of long-term poverty, single-parent families, and welfare dependency. In particular, Wilson argued that large declines in manufacturing jobs had a disproportionate impact on young black inner-city males who often lacked the skills to compete for jobs in a new service-sector economy. Wilson also noted that the increasing suburbanization of industry disproportionately

12. *Id.* at 75, 76, 91; see KATZ, *supra* note 10, at 24, 28-29 (relating Moynihan to Lewis and the culture of poverty theory). Actually, Moynihan borrowed the phrase "tangle of pathology" from the black social psychologist Kenneth Clark. *Id.* at 24. Clark published a study of the African American ghetto that promoted the idea that residential segregation had produced "dark ghettos" characterized by "low aspiration, poor education, family instability, illegitimacy, unemployment, crime, drug addiction and alcoholism, frequent illness and early death." KENNETH B. CLARK, *DARK GHETTO: DILEMMAS OF SOCIAL POWER* 22-27 (1965).

13. KATZ, *supra* note 10, at 24, 28-29. Civil rights leaders did not react uniformly. Some argued that the report shifted the blame from structural and systemic issues such as unemployment and inadequate housing to family pathology, and that it assumed the correctness of "middle-class American values." *Id.* at 44-45 (quoting CORE's Floyd McKissick). On the other hand, Martin Luther King, Jr., viewed the report as an opportunity to address poverty among African American families. *Id.* at 45. Katz contends that criticism of culture of poverty theories often overlooked the fact that although these theories emphasized behavior, they sought to explain this behavior by reference to the economic and social deprivation caused by economic and racial inequality. *Id.* at 24-29; see also WILSON, *supra* note 2, at 4. Wilson underscores the point that because these liberal theorists explained this oppositional culture as a "symptom of class and racial inequality," they effectively challenged conservative arguments that poverty was purely the result of a defective culture. *Id.* at 14.

14. KATZ, *supra* note 10, at 24, 29.

15. WILSON, *supra* note 2, at 4, 15.

16. CHARLES MURRAY, *LOSING GROUND: AMERICAN SOCIAL POLICY 1950-1980*, at 184-85 (1984).

affected young black males, because many of them lived in the inner city, miles away from new entry-level jobs.¹⁷

Ironically, according to Wilson, the success of the civil rights movement further exacerbated the difficulties of the African American poor and contributed to their social isolation. As integration allowed many middle-class blacks to move to the suburbs, inner-city black communities often suffered the loss of role models, resources, and a level of social organization.¹⁸ Thus, although race-specific policies such as affirmative action and antidiscrimination laws have strengthened the black middle class, the civil rights revolution cannot remedy the plight of the "underclass."¹⁹ Rather, because the problems of persistently poor urban blacks are tied into structural economic changes, only "nonracial solutions such as full employment, balanced economic growth, and manpower training and education" can improve the plight of these underclass minorities.²⁰

Many African Americans initially countered Wilson's theory with the argument that his emphasis on the economic schism within the African American community ignored the continuing impact of contemporary racism on both poor and middle-class African Americans.²¹ The ensuing public debate questioned the extent to which contemporary racism could explain the existence of the underclass. Douglas Massey and Nancy Denton enter the discourse, arguing that Wilson's treatment of racial discrimination as a historical legacy ignores

17. WILSON, *supra* note 2, at 39-46, 49-57.

18. *Id.* at 55-62, 143-44. Wilson contends that the flight of the black middle class led to the loss of role models who "reinforce mainstream values," and—more importantly—loss of the "institutional stability" that middle-class families provided through their superior economic and educational resources. *Id.* at 144.

19. *Id.* at 109-24. Wilson made similar arguments in an earlier work. See WILLIAM JULIUS WILSON, *THE DECLINING SIGNIFICANCE OF RACE: BLACKS AND CHANGING AMERICAN INSTITUTIONS* 164-66 (2d ed. 1980).

20. WILSON, *supra* note 2, at 147. Wilson rejects race-specific policies in part because he believes these policies cannot generate sufficient political support. *Id.* at 12 (suggesting that contemporary race-based arguments often fail because they "typify worn-out themes and make conservative writers more interesting in comparison"). In recommending economic policies, Wilson uses the example of the political success of the Social Security program to argue for universal programs such as full employment, rather than programs targeted simply to poor minorities or to poor people generally. *Id.* at 118-24.

21. For example, the Association of Black Sociologists criticized Wilson's book *The Declining Significance of Race* as a "mis-representation of the black experience." ALPHONSO PINKNEY, *THE MYTH OF BLACK PROGRESS* 15 (1984) (quoting Association of Black Sociologists (Sept. 1978) (unpublished resolution)). Pinkney argues that evidence shows that blacks of all classes continue to face discrimination, and that the economic gap between blacks and whites has in fact widened. *Id.* at 13-14; see also Kenneth B. Clark, *The Role of Race*, N.Y. TIMES, § 6 (Magazine), Oct. 5, 1980, at 25, 25-26 (arguing that racism remains the underlying problem); Hollie I. West, *Getting Ahead, And the Man Behind The Class-Race Furor*, WASH. POST, Jan. 1, 1979, at C1, C13 (recounting the debate among black intellectuals regarding Wilson's thesis); Charles V. Willie, *The Inclining Significance of Race*, SOCIETY, July-Aug. 1978, at 10, 12, 15 (critiquing William Julius Wilson, *The Declining Significance of Race*, SOCIETY, Jan.-Feb. 1978, at 56).

Some of the defensive reaction to Wilson may have resulted from a misreading of Wilson's basic points and from the misappropriation of Wilson's argument by critics of affirmative action. Wilson acknowledges that racism continues to play a role in the lives of all African Americans regardless of class, but argues that race-specific policies alone cannot remedy poverty. See WILSON, *supra* note 2, at 109-11. Wilson also acknowledges that some affirmative action programs create opportunities for poor African Americans by giving them access to blue-collar employment opportunities. *Id.* at 115.

the extent to which housing discrimination initially created the underclass and helps to maintain it today. Massey and Denton argue forcefully that to address continuing poverty among African Americans, policymakers must place residential desegregation at the forefront of their political agendas.

This book note examines Massey and Denton's analysis of the role residential segregation has played in creating the black underclass with the race-class debate of the last fifteen years in mind. The first Part of this essay examines Massey and Denton's contention that racial discrimination in the housing market continues to play an instrumental role in limiting the opportunities of African Americans and in creating and maintaining the black underclass. The second Part argues that while the authors persuasively diagnose racism in housing markets as a cause of persistent poverty, they ultimately fail to provide a coherent and convincing remedy for the problem of residential segregation. Massey and Denton's call for systematic housing desegregation fails to appreciate some of the very real difficulties of our post-civil rights context: ambivalence even among civil rights leaders about the goal of integration, as well as despair at the apparent intractability of racism.²²

Massey and Denton successfully undermine the overdrawn race-class dichotomy. But they offhandedly dismiss critiques of integration, calling them self-interested when espoused by black politicians and entrepreneurs and ideological when espoused by black separatists.²³ Because Massey and Denton believe that segregation isolates African Americans economically, politically, and culturally from the mainstream, they argue that systematic residential integration must form the foundation of efforts to solve the underclass problem. Integration in their view, offers the only pragmatic option. Ironically, Massey and Denton's compelling arguments that racial discrimination persists today and that racial disparities result from an interplay between race and class should lead them to question the political viability of the systemic desegregation they advocate. In the end, Massey and Denton fail to provide a coherent vision of how or why "white America" will ever overcome its racism and embrace integration, finally allowing African Americans to share the country's resources.

I. THE FORGOTTEN FACTOR

A. *The Declining Significance of Housing Segregation*

Massey and Denton explicitly hope that their book will reinsert residential segregation into the debate on the underclass. The book begins with an analysis of the roots of the four recent explanations for the existence of an African American underclass: (1) culture of poverty theories, (2) welfare disincentives, (3) institutional racism, and (4) Wilson's theory of economic restructuring and

22. The ambivalence of many African Americans about integration stems in part from Wilson's thesis that integration has harmed the African American community. Skeptics also fear that integration can never be achieved through litigation, because of the phenomenon of "white flight." See text accompanying notes 143-145 *infra*.

23. P. 215.

African American middle-class migration.²⁴ According to the authors, even the theories that call for race-specific remedies in the areas of education and employment fail to consider residential segregation "relevant to understanding the underclass or alleviating urban poverty."²⁵ Massey and Denton call this failure "startling" given that reformers once considered residential desegregation central to understanding and remedying black poverty.²⁶ For example, in 1944, Gunnar Myrdal documented the devastating effect of residential segregation on the economic and social status of African Americans.²⁷ Similarly, in 1965 Kenneth Clark located the problem in segregated neighborhoods when he described the country's "dark ghettos" as "social, political, educational and—above all—economic colonies."²⁸ In 1968, after riots took place in several urban areas, the Kerner Commission, appointed by President Johnson to identify the causes of the unrest, identified residential segregation as a key contributing factor.²⁹ The Kerner Commission warned that the United States was becoming two societies, "separate and unequal," and recommended residential integration along with "ghetto enrichment" strategies.³⁰ The Commission's report helped convince Congress to pass the Fair Housing Act of 1968.³¹

Arguing that residential segregation is the "forgotten factor," an issue seemingly removed from the national agenda with the passage of the Fair Housing Act,³² Massey and Denton write:

The topic of segregation has virtually disappeared from public policy debates; it has vanished from the list of issues on the civil rights agenda; and it has been ignored by social scientists spinning endless theories of the underclass. Residential segregation has become the forgotten factor of American race relations, a minor footnote in the ongoing debate on the urban underclass. Until policy makers, social scientists, and private citizens recognize the crucial role of America's own apartheid in perpetuating urban poverty and racial injustice, the United States will remain a deeply divided and very troubled society.³³

Massey and Denton fail to sufficiently explore why segregation has vanished from the country's political agenda, and why even civil rights organizations fail to place it at the top of their agendas.

Some commentators have attributed the declining public concern with segregation to a popular perception that civil rights laws have eradicated race discrimination in housing and elsewhere. This perception gained force during the 1980s when Republican administrations underenforced civil rights laws and

24. Pp. 1-9.

25. P. 7.

26. P. 3.

27. GUNNAR MYRDAL, *AN AMERICAN DILEMMA: THE NEGRO PROBLEM AND MODERN DEMOCRACY* 618-27 (1944).

28. CLARK, *supra* note 12, at 11.

29. Pp. 3-4.

30. Report of the National Advisory Commission on Civil Disorders 1, 10 (1968).

31. Pub. L. No. 90-284, 82 Stat. 73 (1968) (codified as amended in scattered sections of 28 and 42 U.S.C.); see ROBERT G. SCHWEMM, *HOUSING DISCRIMINATION: LAW AND LITIGATION* § 5.2, at 3-4 (recounting the legislative history of the Act).

32. P. 4.

33. P. 16.

validated white backlash against race-specific remedies.³⁴ Although Massey and Denton blame inattention to segregation primarily on white antipathy, they cast blame on African Americans as well. They explicitly attribute the decline in public concern to factors including black power ideology focused on African American separatism, self-interested African American politicians dependent on segregated districts for their seats, and African American entrepreneurs who want an accessible and closed market for their goods and services.³⁵

In addition, by characterizing their project as an answer to Wilson's and others' theses on the underclass, Massey and Denton imply that class-based explanations also share in the blame.³⁶ "The purpose of this book is to redirect the focus of public debate back to issues of race and racial segregation, and to suggest that they should be fundamental to thinking about the status of black Americans and the origins of the urban underclass."³⁷ While I find their answer to Wilson's class thesis complex, thoughtful, and ultimately convincing, I believe they too hastily dismiss African American ambivalence about desegregation. Even if Massey and Denton succeed in convincing us that race continues to matter, they fail to grapple fully with the challenge of using race-specific remedies to address African American urban poverty at a time not only of white backlash, but also of African American despair about the efficacy of these remedies.

B. *The Last Word on the Race-Class Debate*

Massey and Denton convincingly argue that residential segregation is the primary factor accounting for the creation and perpetuation of the black underclass, and that Wilson and other class theorists underemphasize the continuing significance of racism as the cause of this inner-city poverty.³⁸ The debate on the relative importance of race versus class in explaining the subordination of African Americans in the United States began long before the current public policy debates about the underclass emerged. The traditional Marxist view posits that African American subjugation stems from economic exploitation, and that racism is merely a manifestation of this class conflict.³⁹ Others have argued that race is the more salient factor in the experience of African Americans, as evidenced by the independent ideology of black inferiority in this society, the racism which has historically prevented the formation of alliances between white and black working class people, and the racism that continues today against even middle-class blacks.⁴⁰

Class theorists like Wilson, however, do not necessarily embrace the Marxist tradition.⁴¹ Wilson's type of class-based analysis does not signal a call for a

34. See Gary Orfield, *The Movement for Housing Integration: Rationale and the Nature of the Challenge*, in HOUSING DESEGREGATION AND FEDERAL POLICY 18, 18-20 (John M. Goering ed., 1986).

35. Pp. 213-15.

36. Pp. 6-9.

37. P. 7.

38. See pp. 3, 7-9.

39. PINKNEY, *supra* note 21, at 46-50.

40. *Id.* at 50-53.

41. Wilson considers himself a "social democrat." WILSON, *supra* note 2, at viii.

revolution of the proletariat against the dominating elite or a radical reformation of oppressive institutions. To the contrary, his analyses, which underemphasize the roles of the state and large social institutions in perpetuating class inequality, almost exculpate society for these existing inequalities. For example, Wilson, in his class-based theory of the underclass, refers to "impersonal" economic shifts that reinforce a racial division of labor, rather than looking at the force of racism in mainstream institutions or the distribution of economic power.⁴² For this reason, Adolph Reed argues that Wilson's theory juxtaposes race and economics rather than race and class, and criticizes Wilson for characterizing the economic transformations of the 1970s as impersonal forces "beyond the scope of social intervention."⁴³ From this perspective, Wilson's approach seems to share liberalism's traditional concern with the barriers to mobility that prevent poor blacks from moving into the middle class. It ignores the more difficult question of how to eradicate the structures that maintain racism and class inequality.⁴⁴

Wilson's theory of the underclass fits more properly in a third historical tradition. His lack of concern for the institutional framework that maintains race and class inequality is consistent with the rhetoric of American poverty discourse, which often fails to grapple adequately with "issues of power and distribution."⁴⁵ Thus, although Wilson's focus on "impersonal" economic structures successfully redirected attention away from questions of personal pathology, a traditional Marxist might find characterizations of the theory as "class-based" misleading.⁴⁶

Moreover, by viewing class divisions in terms of impersonal economic forces, Wilson's theory ignores the significance of racism in fueling these economic policies and thus perpetuating inequality. Wilson too easily assumes that the passage of antidiscrimination legislation necessarily leads to its enforcement and that the economic changes that have proven so destructive to the African American community have been race blind. Racism to Wilson apparently consists of explicit acts of intentional discrimination and does not include such subtle phenomena as the government disinvestment that occurred when African Americans gained political control of some cities.⁴⁷ In Reed's words:

Wilson's narrative of the origin of the underclass focuses exclusively on the role of blind, large-scale economic and demographic forces. But such forces do not simply occur . . . they are the products of conscious human action . . .

42. *Id.* at 12. Wilson recognizes that the racial division of labor exists because of "decades, even centuries of discrimination and prejudice." *Id.*

43. Adolph Reed, Jr., *The Liberal Technocrat*, 246 *NATION* 167, 170 (1988).

44. *Id.* Reed writes, "Wilson exemplifies the limits of the liberal technocratic vision. His ultimate concern is not with durable patterns of dispossession and stratification but with apparently accidental roadblocks to equal opportunity." *Id.*

45. KATZ, *supra* note 10, at 8.

46. Katz contends that Wilson brought "more sophistication to the [underclass] debate" by redirecting the focus to joblessness rather than the behavior of the poor. *Id.* at 205.

47. For an argument that segregation and racism combine to restrict public resource distribution to poor urban black neighborhoods, see pp. 158-60. "Once blacks gained [political] control of the central city and whites completed their withdrawal to the surrounding suburbs," public resources followed them. P. 158.

The transformation of postwar industrial cities was driven not by some abstract historical force but by a combination of private investment decisions and state action. This impetus was centered around an urban renewal policy that . . . cut off minority communities . . . There lies the source of Wilson's "social isolation."⁴⁸

Massey and Denton convincingly prove this point: The isolation and concentration of the African American urban poor results not merely from race-blind economic forces but from systemic discrimination in the public and private housing markets. Massey and Denton show that residential segregation persists in most large cities and that housing discrimination remains rampant.⁴⁹ Because poor white people do not experience segregation at the same rate as poor African Americans, Massey and Denton conclude that class alone cannot explain the extreme segregation of African Americans.⁵⁰ Even though some middle-class African Americans have migrated out of the inner city, they are still highly segregated from whites, and live in much poorer neighborhoods than the middle-class populations of other ethnic groups.⁵¹

Thus, Massey and Denton reject the "specious opposition of race and class" by showing how "race and class interact to undermine the social and economic well-being of black Americans."⁵² They do not contend that economic changes are entirely insignificant in understanding the existence of the underclass, but they argue that the intersection of racial segregation and poverty produces unparalleled concentrations of poverty.⁵³ Massey and Denton accept Wilson's observation of structural changes in the economy during the 1970s and 1980s but argue that without racial segregation these changes "would not have produced the disastrous social and economic outcomes observed in inner cities."⁵⁴ In that sense, they successfully move beyond the worn-out race-class debate.

Debate over these theories about the root of the poverty problem is not simply academic; the public policy agenda to combat urban poverty is at stake. Wilson's followers will reject race-specific remedies in favor of the nonracial policies of job creation, job training, and family allowances targeted to poor and nonpoor people alike.⁵⁵ In contrast, Massey and Denton advocate class-

48. Reed, *supra* note 43, at 168-69. Some commentators have also argued that Wilson pays insufficient attention to racial discrimination and segregation in areas such as education and employment, and the role of both in maintaining persistent poverty. For example, Charles Willie notes that, controlling for educational achievement, black men are more likely to occupy labor and service jobs, as opposed to professional and managerial jobs, than white men. Both poorly educated and highly educated blacks earn less than their similarly educated white counterparts. Charles V. Willie, *On the Prevention and Cure of Poverty and Racism*, in *THE CASTE AND CLASS CONTROVERSY ON RACE AND POVERTY: ROUND TWO OF THE WILLIE/WILSON DEBATE* 168, 173-74 (Charles Vert Willie ed., 2d ed. 1989).

49. Massey and Denton cite several studies of housing discrimination carried out in the 1970s and 1980s. These studies, controlling for differences in income, show widespread discrimination against blacks in sale and rental of housing and in mortgage and credit assistance to black home buyers. Pp. 99-109.

50. Pp. 85-88, 144. Unlike Hispanics and Asians, "[o]nly blacks experience a pattern of constant, high segregation that is impervious to socioeconomic influences." P. 88.

51. P. 144.

52. P. 220.

53. P. 146.

54. P. 8.

55. WILSON, *supra* note 2, at 147, 151-52.

and race-specific policies—specifically, systemic housing desegregation.⁵⁶ Significantly, both sets of recommendations rely on notions of pragmatism; the theorists have differing ideas of what will “work” and garner political support. Wilson rejects race-specific policies in part because he believes they would be politically unpalatable.⁵⁷ For Massey and Denton, the persistence of racism suggests that class-specific remedies cannot succeed in the absence of massive housing desegregation, both because these remedies will not gain political support and because these remedies do not address concentrated poverty, a major “cause” of the underclass.⁵⁸ As discussed below, even though (or perhaps *because*) Massey and Denton collapse the race-class dichotomy, they insist on race-specific residential desegregation as a necessary, if not sufficient, element in efforts to eradicate urban poverty. In the following Part, I address Massey and Denton’s development of the case for housing desegregation, and their discussion of black power ideology and African American self-interest as reasons for the disappearance of residential segregation from the public policy agenda.

C. The “Integration Imperative”⁵⁹

From Massey and Denton’s perspective, evidence of the spatial separation between African Americans and the rest of America’s populations should inspire any well-intentioned African American to advocate residential integration through fair housing practices to deconcentrate the inner-city poor. I will explore this assumption not to argue in favor of black separatism, or to insist on the existence of a monolithic black opinion on integration, but to reveal the weakness of a remedy that fails to fully address the competing arguments against residential integration.

Massey and Denton argue that residential segregation has disappeared from the public policy debate due to a “combination of ideology and self-interest” on the part of some members of the African American community.⁶⁰ They theorize that African American political leaders shy away from residential integration because they would have to compete with leaders of other ethnic groups and would lose “safe seats” in government.⁶¹ The ideology of black power separatists supports segregation, according to Massey and Denton, because its proponents believe that integration reinforces white superiority, and that other ethnic groups have succeeded because of their separatism.⁶² Hence, separatists argue that for African Americans to achieve economic power, they too must

56. P. 220.

57. See note 20 *supra*. The current popularity of Wilson’s thesis may be proof of this. See, e.g., Page, *supra* note 5, at A28 (discussing how President Clinton has sought Wilson’s advice on the need for race-blind measures). Willie suggests that Wilson’s idea has prevailed over race-based explanations because it removes the blame for urban poverty from white Americans who are “weary of domestic strife and guilt-edged sermons.” Willie, *supra* note 48, at 170 (quoting Richard Margolis).

58. P. 220.

59. I have borrowed this term from John Calmore. See John O. Calmore, *Spatial Equality and the Kerner Commission Report: A Back-to-the-Future Essay*, 71 N.C. L. REV. 1487, 1496 (1993).

60. P. 215.

61. P. 215.

62. P. 215.

develop their own ethnic enclaves.⁶³ For Massey and Denton, however, such justifications for segregation are suspect: Segregated African American communities can never equal white communities because "segregation leaves blacks in a position of permanent political dependency and vulnerability to economic dislocation."⁶⁴ Massey and Denton's conclusion that integration must accompany any solution depends on two showings: first, that African American ghettos result from conscious and willful segregation not imposed on other ethnic groups, and second, that concentrated black poverty is self-perpetuating.

1. *The creation of the black ghetto.*

Massey and Denton first attempt to dispel, or at least cast doubt upon, the myths they see as supporting separatist ideals. First, they attempt to debunk the conception of African American "ghettos" as a natural or unavoidable part of the American landscape. To the contrary, Massey and Denton point out, housing was not highly segregated by race in either Northern or Southern cities in the nineteenth century.⁶⁵ Most black ghettos emerged after 1900, when African Americans began to migrate in larger numbers northward into urban areas, and as the American economy became more industrialized.⁶⁶ The ghettos did not result from random socioeconomic forces, but were consciously created and maintained through mechanisms such as restrictive covenants, antiblack violence, and institutionalized discrimination by real estate brokers and banks.⁶⁷

The federal government, particularly after World War II, helped create these ghettos. The Home Owners' Loan Corporation (HOLC) engaged "redlining," consistently undervaluing black neighborhoods for the purpose of making mortgage loans.⁶⁸ The redlining practices influenced the loan decisions of the Federal Housing Administration (FHA), the Veterans Administration, and private banks.⁶⁹ In black neighborhoods, owners could not sell their homes, property values declined, and "a pattern of disrepair, deterioration, vacancy, and abandonment" set in.⁷⁰ According to Massey and Denton, federal government practices also encouraged the emigration and suburbanization of whites, which only enhanced the process of segregation and the deterioration of many urban neighborhoods. When whites in institutions such as universities, hospitals, and libraries complained of the declining cities, governments launched "urban renewal" and "slum clearance" projects, displacing many African American residents.⁷¹ The federal government reinforced segregation by building high-rise public housing for displaced African Americans, thereby creating "black reser-

63. P. 215.

64. P. 216.

65. P. 17.

66. Pp. 18-32.

67. Pp. 33-42, 50-51.

68. Pp. 51-52.

69. Pp. 52-53. Both the HOLC and the FHA "manifested an obsessive concern" with racially homogenous neighborhoods. P. 54.

70. P. 55.

71. Pp. 55-56.

vations, highly segregated from the rest of society and characterized by extreme social isolation."⁷²

Massey and Denton also dispel the myth that other ethnic groups, particularly the early twentieth century immigrants from Southern and Eastern Europe, ever experienced the same degree of segregation as African Americans. They provide evidence that European immigrant neighborhoods never reflected the high degree of homogeneity and spatial isolation of black ghettos, and that immigrant neighborhoods decreased in number as the socioeconomic status of the groups improved.⁷³ Massey and Denton's own research shows that this pattern of unparalleled African American isolation persists today. African Americans continue to be much more segregated than Mexican and Asian Americans.⁷⁴ Only Puerto Ricans have experienced levels of segregation similar to African Americans, a phenomenon Massey and Denton attribute to the dark skin color of many Puerto Ricans.⁷⁵ Contrary to the claims of some separatists that all immigrant groups pass through a period of living in homogenous and separated enclaves—and that these groups in fact may have derived their strength from their separation—Massey and Denton assert that blacks have been and "remain the most spatially isolated population in U.S. history."⁷⁶

By debunking these myths, Massey and Denton successfully complicate at least one of the tenets underlying the "ideology" of black separatism: the notion that in order for African Americans to progress, they must follow the lead of other ethnic groups and isolate themselves and build their own institutions.⁷⁷ The debates about separatism versus integration are not new: Two decades ago, Bayard Rustin criticized the "black power" movement of the late 1960s for accepting a historical myth that white ethnic groups advanced in society because members of the group stuck together. Rustin argued instead that ethnic whites achieved success through coalition politics and intergroup alliances.⁷⁸ Ironically, however, the very fact Massey and Denton (and Rustin for that matter⁷⁹) prove, that the experience of African Americans differs from that of other ethnic groups, may actually underlie and strengthen movements toward black separatism.⁸⁰ Rather than signaling mere self-interest or ideology, the desire

72. P. 57.

73. Pp. 32-33.

74. P. 146.

75. P. 147. Their research and other studies demonstrate that Latino segregation is lowest for white Latinos and increases progressively with darker skin, with black Latinos experiencing segregation levels comparable to those of black Americans. Pp. 113-14. The authors also cite other studies that indicate that dark-skinned Hispanics face significantly more housing discrimination. P. 114.

76. P. 114.

77. E.g., STOKELY CARMICHAEL & CHARLES V. HAMILTON, *BLACK POWER: THE POLITICS OF LIBERATION IN AMERICA* 44-46 (1967).

78. BAYARD RUSTIN, "Black Power" and Coalition Politics, in *DOWN THE LINE: THE COLLECTED WRITINGS OF BAYARD RUSTIN* 154, 156 (1971).

79. See *id.* at 164 (contrasting the situation and opportunities of African Americans with those of other immigrant groups).

80. See Gary Peller, *Race Consciousness*, 1990 DUKE L.J. 758, 791-95 (stating that black nationalists posit that African Americans are a "distinct social community" due to their history of subjugation). But see KWAME ANTHONY APPIAH, *IN MY FATHER'S HOUSE: AFRICA IN THE PHILOSOPHY OF CULTURE* 46-73 (1992) (critiquing notions of both biological and socially constructed race).

for separation may reflect a concern about the apparent uniqueness of the black experience and the seeming permanence of racism in American life. That other ethnic groups, even "racially" different groups like Mexican and Asian Americans, have not suffered comparable levels of segregation suggests the continued salience of "blackness" and the limits of the immigrant analogy in explaining the African American experience.⁸¹ I point this out not to ignore the shortcomings of theories of black separatism and black capitalism, or to deny the racism and prejudice faced by other ethnic groups, but to call into question the notion that African Americans should or—perhaps more significantly—*can* follow the path to integration and coalition building other ethnic groups have taken. Although Massey and Denton challenge some of the assumptions underlying black separatism, they ultimately fail to grapple fully with the implications of their own arguments. Precisely because Massey and Denton so convincingly identify the uniqueness of the experience of African Americans, their insistence on residential integration remains unconvincing.⁸²

2. *Segregation, culture, and the underclass.*

Massey and Denton base their strongest argument for integration on an extensive discussion of the adverse effects of concentrated African American poverty. They argue that residential segregation creates and perpetuates an "underclass" by concentrating poor African Americans in neighborhoods with extremely high poverty rates. By failing to challenge the term "underclass," Massey and Denton accept its standard definition as a category of persistently poor Americans characterized by pathological behavior—welfare dependence, long-term unemployment, crime, and drug addiction.⁸³ Massey and Denton's view of the underclass as a mesh of persistent poverty and pathological behavior leads them to characterize segregation's effect on African Americans in terms of both material and cultural deprivation. Thus, segregation creates an African American underclass in part because it confines blacks to areas with "poor schools, low home values, inferior services, high crime, and low educa-

81. See MICHAEL OMI & HOWARD WINANT, *RACIAL FORMATION IN THE UNITED STATES: FROM THE 1960s TO THE 1990s* 19-23 (2d ed. 1994).

82. Rustin, a great critic of black nationalism, presents the theory that separatism is primarily a product of despair that arises cyclically in black history after phases of dashed hopes. See RUSTIN, *supra* note 78, at 157. This theory would describe aptly the current post-civil rights era and the feelings many African Americans share. But the cyclical nature of this despair does not warrant its dismissal as irrelevant, self-interested, or unworkable. In fact, the existence of the cycle—the fact that the integration-segregation debate has long existed—points to the complexity and the difficulty of the African American struggle for equality.

83. See p. 142 (employing the term "underclass" without examining it, arguing that "the term [underclass] popularly connotes people who are mired in poverty and unable to escape it"). Some commentators have questioned the usefulness of the term "underclass." Michael Katz calls it problematic because it defines poverty in terms of bad behavior, ignores collective action by poor people, and deflects attention from structural transformations that have led to an increase in the number of persistently poor Americans. Michael B. Katz, *Reframing the "Underclass" in the "UNDERCLASS" DEBATE: LESSONS FROM HISTORY*, *supra* note 2, at 440, 440-43 (1992). See generally Herbert J. Gans, *Deconstructing the Underclass: The Term's Dangers as a Planning Concept*, 1990 J. AM. PLAN. ASS'N 271 (describing 10 major dangers of using the term).

tional aspirations.”⁸⁴ Their view of the underclass as a set of pathological behaviors leads Massey and Denton to argue that segregation has confined and concentrated deviant behaviors and values among African Americans.⁸⁵

The authors provide a compelling historical description of how socioeconomic conditions developed from segregation. Massey and Denton counter the common perception that poverty, *not* race, explains why so many African Americans live in ghettos. Using statistical models to examine the combined and separate effects of race and class segregation, Massey and Denton demonstrate that class segregation alone cannot explain the high concentration of poor blacks in ghettos. In fact, racial segregation allows white citizens to isolate themselves from black poverty, since race and class segregation combine to concentrate poverty in poor black neighborhoods.⁸⁶ The combination results in the greater likelihood of poor blacks living in neighborhoods of extreme poverty than poor whites.⁸⁷ This geographic concentration of poverty brings deleterious social consequences, most particularly the phenomenon of “urban desertification” due to housing dilapidation and abandonment: As neighborhoods decay, commercial institutions and retail businesses abandon the inner city in favor of suburban areas.⁸⁸

According to Massey and Denton, residential segregation also retards the socioeconomic advancement of African Americans by weakening their political power. Other commentators add that economic gains have not necessarily followed gains in African American political clout. The federal government’s curtailment of urban investment at precisely the time African Americans gained political control of some cities is partially to blame.⁸⁹ Massey and Denton maintain that other ethnic groups advanced socioeconomically because they were less segregated and shared interests with other ethnic groups. They participated in pluralist politics, receiving favors in return for votes.⁹⁰ African Americans, by contrast, have not managed to form such coalitions because, segregated in decaying inner cities, they share few political interests with other ethnic groups.⁹¹

In addition to arguing that segregation multiplies the effects of poverty by isolating blacks socially, economically, and politically, Massey and Denton claim that segregation has led to the cultural isolation of African Americans, and thus to the development of an “alternative status system . . . that is defined

84. P. 150.

85. See text accompanying notes 92-94 *infra*.

86. Pp. 123-25.

87. P. 125.

88. Pp. 134-35 (citing Roderick Wallace, *Urban Desertification, Public Health, and Public Order: 'Planned Shrinkage,' Violent Death, Substance Abuse and AIDS in the Bronx*, 32 Soc. Sci. Med. 1 (1991)).

89. Pp. 157-58 (documenting black control of certain cities); see, e.g., Mike Davis, *Who Killed L.A.? The War Against the Cities*, CROSSROADS, June 1993, at 2, 7-9 (documenting extensive federal disinvestment from cities).

90. P. 153-54.

91. P. 155; see also p. 158 (arguing that “money that flows into black central cities generally means increased taxes . . . for suburban whites”).

in opposition to the basic ideals and values of American society."⁹² Massey and Denton argue that many of the "shortcomings" typically associated with African American ghettos (teenage pregnancy, single-parent families, unemployment, drug abuse) function as coping mechanisms for dealing with harsh environments.⁹³ The authors claim African Americans have developed a separate culture that devalues mainstream concepts of success. For example, black schoolchildren who excel and black students who speak standard English sometimes face ridicule from their peers for "acting white."⁹⁴ Lest this talk of an oppositional culture sound like the "culture of poverty" theories revisited, Massey and Denton disclaim: "It is not a self-perpetuating 'culture of poverty' that retards black educational progress, but a structurally created and sustained 'culture of segregation'. . . ."⁹⁵

Although Massey and Denton convincingly identify the structural racism that leads to persistent poverty, they ultimately fail to distinguish themselves fully from the "culture of poverty" rhetoric rooted in traditional notions of the deserving and the undeserving poor—rhetoric that persists in much of the scholarship on the underclass.⁹⁶ Massey and Denton merely replace "poverty" with "segregation." They fail to perceive that the flaw in "culture of poverty" theory, like talk of the "underclass," is the rhetoric of culture as pathology. In so doing, Massey and Denton, like "culture of poverty" proponents, wrongly assume that poverty is transmitted from "person to person and generation to generation," much like a disease.⁹⁷ The authors' discussion of an oppositional inner-city culture defines behaviors in the inner city as deviant, yet lacks any critical examination of "the broader ideals of" American society. For example, they contend that middle-class America "idealizes the values of self-reliance, hard work, sobriety, and sacrifice" without any critical examination of the ways in which middle-class behavior deviates from these purported ideals.⁹⁸ Thus, the authors, while readily identifying "pathological" behavior in the inner city, fail to observe the prevalence of these behaviors elsewhere.⁹⁹

92. P. 167.

93. Pp. 166-67, 169-70.

94. P. 168.

95. P. 169.

96. See KATZ, *supra* note 10, at 9-16 (arguing that the underclass is a modern-day variant of the "undeserving poor" and linking it to a historic preoccupation with making moral assessments about poor people).

97. P. 181.

98. P. 166. For example, annual studies by the National Institute on Drug Abuse consistently show higher rates of drug use among white students than among their African American counterparts. See, e.g., Rod Watson, *An Underreported Black Success Story: African American Students Lowest in Use of Narcotics*, *Buff. News*, Feb. 17, 1994, at C3.

99. See p. 177.

The painstaking analysis that characterizes Massey and Denton's discussion in much of the book becomes less careful in this section. The authors begin to lose sense of the dimensions of this oppositional culture, and their analysis starts to read like a mainstream media account of "ghetto" life. For example, Massey and Denton describe rap music—the music of black street culture—as misogynistic. P. 176. Their analysis leaves no room for rap artists who extol other values, such as Queen Latifah and K.R.S. One, who extol values such as black pride, economic self reliance, and women's pride. These artists could also be said to reflect "ghetto" values.

In the end, the authors' attempt to distance themselves from "culture of poverty" rhetoric fails because their notion of the culture of segregation conveys a view of culture as "a self-perpetuating and impermeable 'thing,' passed on almost genetically from one generation to the next, never influenced by, say, other 'cultures.'" ¹⁰⁰ For example, Massey and Denton contend that this culture of segregation originates in a lack of opportunity for poor African Americans, but as new generations are born into poverty it becomes "autonomous and independent." ¹⁰¹ Examining only the pathology of the poor and ignoring the connections between underclass behavior and behavior in the larger society is endemic to much of underclass analysis. As Michael Katz has observed regarding underclass scholarship:

It hives off the underclass, which it places alone under a very high-powered microscope. It offers a class analysis based almost entirely on the examination of one class Social science thereby misses a very important point: the processes creating an underclass degrade all our lives. The degradation of civic experience, democracy, and the public sphere in contemporary urban America result from the same forces that produced the underclass. ¹⁰²

Thus, for Massey and Denton, the idea that segregation produces intense economic, social, and cultural isolation from mainstream society's resources and values makes strategies that seek to deconcentrate the inner-city poor necessary for remedying persistent poverty among African Americans. From this perspective, segregated African American communities will never be able to form political coalitions to end policies detrimental to their welfare. Culturally isolated, African American families will never be able to escape poverty unless they can expose their children to "mainstream" social institutions. In other words, strategies that seek to equalize conditions for urban, poor African Americans through economic and low-income housing development will never remedy the plight of the inner-city poor. For Massey and Denton, effective remedies must necessarily begin with efforts to end residential segregation.

Massey and Denton also fail to account for the popularity among white middle-class teenagers of some of the groups they cite as epitomizing black street culture. See Marisol Bello, *'Gangsta' Rap Attracts White Suburban Teens*, MINNEAPOLIS/ST. PAUL STAR TRIB., Dec. 6, 1993, at 8E (reporting that white teenagers doled out more than half of the \$7.8 billion spent on rap music in 1991). Gangsta rap might have reached its popularity among white teenagers precisely *because* it feeds off stereotypes about the black oppositional culture. See *Old Stereotypes of Bad Rap*, ATLANTA CONST., Dec. 7, 1993, at A22 (editorial asserting that whites "are in love with the romantic idea of black people as cool, defiant rebels who step on anyone who gets in the way"). Alternatively, perhaps white teenagers buy rap because it appeals to their own "culture." See Bello, *supra*, at 8E (quoting psychologist Michael Williams, who says, "Much of the rap is very macho" and might appeal to teen boys who want to exert their new sense of masculinity). In any case, the rap example suggests a notion of culture more permeable and interdependent than Massey and Denton's.

Finally, Massey and Denton's invocation of rap shows how their discussion of an oppositional black culture fails to look critically at "mainstream" society: They do not analyze either the misogynist and violent lyrics of traditionally "white" metal bands such as Guns 'n' Roses or the misogyny that pervades much of our society.

100. Gerald P. López, *I'll Tell You What's Pathological* 16 (Apr. 27, 1992) (unpublished manuscript, on file with the *Stanford Law Review*) (discussing Wilson).

101. P. 184.

102. Katz, *supra* note 83, at 442.

Massey and Denton's analysis of the "culture of segregation" lacks force because it fails to examine the dominant culture from which urban African American culture supposedly deviates. Although Massey and Denton focus largely on pragmatic justifications for integration, their discussion of culture, which devalues African American communities, subtly infuses all their arguments and prescriptions. This concern blinds Massey and Denton, in the end, to a more thorough and productive examination of the limits of integration.

II. LEFT BEHIND: THE LIMITS OF MASSEY AND DENTON'S VISION

Massey and Denton's views reflect an approach John Calmore has labeled "the 'integration imperative.'" ¹⁰³ This approach prioritizes residential integration at the expense of "spatial equality" community economic development strategies. Spatial equality, analogous to educational equity, "compensates for past discrimination by legitimately combining the most effective features of affirmative action with expanded housing opportunity and choice."¹⁰⁴ Under Massey and Denton's analysis, spatial equality strategies—affordable housing development, small business development and home ownership assistance programs—are doomed, because white prejudice and institutional discrimination will always prevent separate black communities from achieving economic equality.¹⁰⁵ Thus, integration remains the pragmatic route to help African Americans access the resources currently concentrated in white communities.¹⁰⁶ Yet Massey and Denton fail to address fully the myriad critiques that question the utility of integration strategies.

A. *Desegregating the Underclass*

Massey and Denton call on the nation, led by the Department of Housing and Urban Development (HUD), to dismantle the ghetto. They recommend that HUD implement a systematic program to combat discrimination in the private housing market by increasing funding to local fair housing organizations, identifying realtors who discriminate, ensuring that lenders comply with fair housing statutes, promoting desegregation by providing poor blacks with subsidized rental vouchers, and obtaining administrative relief for victims of housing discrimination using the recent amendments to the Fair Housing Act.¹⁰⁷

Massey and Denton explicitly recommend the implementation of programs like Chicago's Gautreaux demonstration program, which moves blacks from economically and racially segregated public housing into racially mixed or white neighborhoods through rental subsidies.¹⁰⁸ Chicago established the pro-

103. Calmore, *supra* note 59, at 1493-94 (arguing that Title VIII of the Civil Rights Act of 1968 aimed to replace "ghettos" with "truly integrated . . . living patterns" and in so doing wrongly emphasized desegregation "rather than simple nonsegregation and free choice as to where to live").

104. *Id.* at 1495.

105. See notes 119 & 158 *infra* and accompanying text.

106. Orfield, *supra* note 34, at 20-21.

107. Pp. 229-32.

108. P. 231. Under the Civil Rights Acts of 1964 and 1968, HUD has an affirmative duty to promote integration in federally subsidized programs. 42 U.S.C. § 3610 (1988); see Florence Wagman

gram as a remedy in a class action suit brought by public housing residents against the Chicago Public Housing Authority (CHA) (and, subsequently, the Department of Housing and Urban Development (HUD)) for intentional racial discrimination in site selection and tenant assignment.¹⁰⁹ After years of litigation, during which CHA repeatedly failed to comply with court orders to build public housing outside minority-dominated areas, HUD and the plaintiffs agreed to create a demonstration project using subsidies under section 8 of the Housing Act of 1937 to place residents in housing dispersed throughout the metropolitan area.¹¹⁰

Gautreaux and other housing mobility programs—most of which emerged as remedies to housing desegregation suits—seem to have successfully improved participants' life opportunities. For example, program participants demonstrate greater success in education and employment than the people who remain in public housing. Since the Gautreaux Mobility Program began in 1976, it has served over 4500 families,¹¹¹ half of whom moved into majority white suburbs and half of whom moved into Chicago city neighborhoods with fewer than 30 percent African American residents.¹¹² Follow-up studies of the Gautreaux participants show that those who had previously been unemployed were 25 percent more likely to be employed if they had moved to the suburbs rather than elsewhere in the city.¹¹³ Suburban employers paid higher wages and were more likely to provide benefits.¹¹⁴ The children and youth who moved to the suburbs also demonstrated greater achievement levels in school, higher college enrollment, and higher employment levels.¹¹⁵ Other housing mobility programs report similar results: A Cincinnati mobility program established in 1984 found that over a nine-year period the parents of the 600 African American families who moved to the suburbs had improved their employment opportunities and often held jobs with higher pay and better benefits than the

Roisman & Philip Tegeler, *Improving and Expanding Housing Opportunities for Poor People of Color: Recent Developments in Federal and State Courts*, 24 CLEARINGHOUSE REV. 312, 325 (1990) (explaining HUD's legislative mandate in detail).

109. In *Gautreaux v. Chicago Housing Authority*, 296 F. Supp. 907, 914 (N.D. Ill. 1969), and *Gautreaux v. Romney*, 448 F.2d 731, 739 (7th Cir. 1971), courts found CHA and HUD, respectively, liable for intentional racial discrimination. In *Hills v. Gautreaux*, 425 U.S. 284, 297-306 (1976), the Supreme Court affirmed the 7th Circuit's order of metropolitan-wide relief. For a detailed description of this litigation, see Alexander Polikoff, *Gautreaux and Institutional Litigation*, 64 CHI.-KENT L. REV. 451, 453-66, 468-70 (1988).

110. 42 U.S.C. § 173f (1988); see Polikoff, *supra* note 109, at 460, 473. Massey and Denton recommend the *Gautreaux* model as a way of complying with that mandate, "[g]iven the reality of intense opposition to the construction of projects outside the ghetto." P. 231.

111. James E. Rosenbaum, Nancy Fishman, Alison Brett & Patricia Meaden, *Can the Kerner Commission's Housing Strategy Improve Employment, Education, and Social Integration For Low-Income Blacks?*, 71 N.C. L. REV. 1519, 1522 (1993).

112. *Id.*; Florence Wagman Roisman & Hilary Botein, *Housing Mobility and Life Opportunities*, 27 CLEARINGHOUSE REV. 335, 336 (1993).

113. Rosenbaum et al., *supra* note 111, at 1528.

114. Roisman & Botein, *supra* note 112, at 336.

115. Rosenbaum et al., *supra* note 111, at 1530-34.

residents of public housing who remained behind.¹¹⁶ In 1991, Congress established a national demonstration project based on the Gautreaux model.¹¹⁷

The increased social and economic mobility of the Gautreaux program participants bolsters the proposition that deconcentrating the inner-city poor can improve their life opportunities. In that sense, the program is consistent with Massey and Denton's emphasis on the superior resources and economic and educational opportunities available to white suburban residents. Although the success of participants contradicts notions that *personal* pathology causes persistent poverty, these programs arguably confirm role model and cultural pathology theories: Once inner-city residents move out of an environment in which mainstream values are denigrated, they flourish.¹¹⁸

Of course, the success of the Gautreaux program alone does not prove the relative ineffectiveness of strategies that aim to equalize conditions in the inner city itself. Improving safety, providing adequate role models, and improving access to jobs—all of which helped Gautreaux participants succeed in the suburbs—might well improve the lot of those who remain in cities as well. Massey and Denton insist on housing mobility programs and other desegregation strategies not because they think equalization approaches are poor prescriptions in and of themselves, but because they believe that equalization strategies will not survive politically.¹¹⁹ William Julius Wilson also based his call for nonracial policies on a notion of political viability: His proposals rested on the assumption that the American public would find strategies that deemphasized race (and class) more palatable.¹²⁰ In fact, both strategies have encountered significant political resistance, making a comparison of political viability difficult. The *Gautreaux* litigation itself demonstrates the potential resistance to race-based housing remedies: The demonstration project emerged only after years of arduous litigation and serves a relatively small number of families.¹²¹

Unfortunately, Massey and Denton fail to explore many of the issues arising from the *Gautreaux* litigation and other housing mobility programs. They fail to consider whether integration truly offers a viable option for the majority of poor African Americans. They also refuse to acknowledge that "separatist" notions of community might be valid, since the distinctive experience of Afri-

116. Roisman & Botein, *supra* note 112, at 337.

117. 42 U.S.C. § 1437f (Supp. V 1993). This act funds a demonstration project in six cities to assist low-income families living in public housing to move into areas with lower concentrations of poverty. *Id.*

118. However, the rapid adjustment of the Gautreaux families would weaken arguments that inner-city blacks had developed an autonomous and independent culture immune to "mainstream" values and aspirations. Cf. Rosenbaum et al., *supra* note 111, at 1555 (stating that the Gautreaux findings seem to disprove the "pessimistic predictions of 'culture of poverty' models").

119. P. 160.

120. See note 20 *supra* and accompanying text.

121. In fact, as Polikoff points out, the more expansive remedy first attempted in *Gautreaux*, constructing new public housing in white neighborhoods, met with greater political resistance than the more limited housing mobility remedy to which the parties eventually agreed. Polikoff, *supra* note 109, at 459-61, 473-76. Massey and Denton recommend the implementation of housing mobility programs for exactly this reason. See note 110 *supra*.

can Americans has understandably bred doubts about the feasibility of integration.

B. *Nostalgia for Community*

Because Massey and Denton's framework links segregation to devastating cultural and social effects, the authors predict that even voluntary separation will prove destructive. Their invocation of the black power "ideology" of the 1960s suggests that they find many antiintegration arguments to reflect a kind of outmoded separatism.¹²² Despite Massey and Denton's concerns, arguments *against* integration have gained momentum in recent years, perhaps ironically in response to the minimal amount of residential and school integration achieved in the 1970s and 1980s. Proponents of separatism believe integration destroyed historically black communities, which because of their class mix provided psychological and social benefits not available in today's poor African American communities. But Massey and Denton dispute the force of these arguments because, as their discussion of the "culture of segregation" reveals, they find little that is valuable or self-affirming about African American community.

Significantly, some observers who question the usefulness of race-specific remedies in aiding the inner-city poor often characterize *integration* as destructive to the African American community. In that sense Wilson's argument, which some African Americans originally vilified, resonates today in popular discourse about integration's role in isolating poor African Americans. At least before the civil rights movement, the argument goes, African Americans of all classes lived together. Accordingly communities benefited from role models, black-owned businesses received community support, and social institutions such as churches provided a sense of stability.¹²³ Massey and Denton suggest that this argument erroneously focuses on the exodus of the black middle class. In truth, they argue, the exodus did not cause the deleterious residential environment of the inner city,¹²⁴ and blaming the black middle class for leaving poor city communities denies them the same right to flee poverty and bad con-

122. See note 23 *supra* and accompanying text; see also Calmore, *supra* note 59, at 1487 n.4 (suggesting that the critique of "race consciousness" as separatist is itself the retreaded 1960s argument).

123. See Richard Bernstein, *20 Years After the Kerner Report: Three Societies, All Separate*, N.Y. TIMES, Feb. 29, 1988, at B8. "Twenty years ago, because there was so much discrimination, black professionals had to stay in the inner city . . . Now, they have moved out and there are fewer role models for the people left behind." *Id.* (quoting Bud Kanitz). A 34-year-old black woman on a tour of the decaying neighborhood where she used to live says, "I remember growing up here as a girl and there were shops, theaters, restaurants, and schools." *Id.* (quoting NAACP Cleveland executive director Pauline Tarver).

Another commentator writes:

The incorporation of an African American middle class into America's mainstream left the poor elements of the African American community without leaders and institutions.

Visit any inner-city neighborhood . . . and you will find an absence of basic black-owned and controlled institutions . . . These institutions are important because they transmit values and place permanent, positive role models in the community.

Kevin W. Cosby, *Inescapable Solidarity Racism*, LOUISVILLE COURIER J., May 6, 1992, at 13A.

124. Pp. 126-27.

ditions that other ethnic groups enjoy.¹²⁵ Massey and Denton's observation ignores an alternative version of African American history: a history that questions whether African Americans' advancement can parallel that of other ethnic groups. African American arguments in favor of separate African American communities continue to carry force partly because of the extent of African Americans' historical and current exclusion from mainstream society.

In questioning the benefits of prioritizing residential integration over spatial equality or community economic development strategies, recent academic commentators point to the psychological, social, cultural, and economic benefits of living in an African American community. Although Massey and Denton characterize separate African American communities mainly in terms of the deleterious behaviors they concentrate and reinforce, integration skeptics find numerous psychological benefits in separate communities. African Americans may derive psychological benefits from close association with their neighbors¹²⁶ and from exercising some amount of political and economic power over their own communities.¹²⁷ The African American community can also serve as a refuge from a larger society blacks perceive as racist, dominant, or hostile.¹²⁸ From this perspective, Ankur Goel suggests, African Americans "might seek support in their housing situation . . . to develop needed social support networks."¹²⁹ Deconcentration strategies requiring African Americans to move into majority-white neighborhoods may cause them to experience social isolation without the support of the traditional community, kinship, and social networks often found in churches and civic groups.¹³⁰ These benefits may outweigh the costs of not integrating, such as scarce resources, fewer employment opportunities, and inferior schools. Community development and spatial equality strategies may be seen not as acquiescence with one's colonization (as Massey and Denton suggest) but as a realistic attempt to gain the resources of mainstream society without sacrificing the benefits of community.¹³¹ Massey and Denton, however, find only psychic harm, and deny any psychic benefit.

125. Massey and Denton write:

Throughout U.S. history, the wealthy of all groups have sought to put distance between themselves and the poor. As their levels of education, income, and occupational statuses have risen, Jews, Italians, Poles, Mexicans, and Asians have all sought improved housing in better neighborhoods not dominated by their own ethnic group.

P. 145.

126. See, e.g., DERRICK BELL, *RACE, RACISM AND AMERICAN LAW* § 8.13 (3d ed. 1992) (discussing studies that conclude that "slum living" provides a feeling of community and a sense of identity, and a study that describes the grief residents felt after the government removed them from their substandard houses).

127. See Ankur J. Goel, *Maintaining Integration Against Minority Interests: An Anti-Subjugation Theory for Equality in Housing*, 22 URB. LAW. 369, 390 (1990).

128. *Id.* at 394-95.

129. *Id.* at 395.

130. Wilhelmina A. Leigh & James D. McGhee, *A Minority Perspective on Residential Racial Integration*, in *HOUSING DESEGREGATION AND FEDERAL POLICY*, *supra* note 34, at 31, 36-37. Leigh and McGhee point out that most critiques of integration "center on the location of the process." *Id.* at 36. Blacks may prefer not to move into white communities, and may oppose the integration of whites into black neighborhoods when the integration involves gentrification and displacement. *Id.* at 36-37.

131. A community created by forced racial exclusion can become a community people inhabit by choice. For Massey and Denton, however, no "healthy" African American can desire separate commu-

The argument that African American communities form because of voluntary choices risks supporting regressive arguments that discrimination plays no part in housing segregation. But middle-class African Americans with greater mobility often do choose to live in majority-black neighborhoods. Several African American professionals explain their decision to live together in a neighborhood outside of Los Angeles mainly in terms of their desire for community. They appreciate the presence of "black role models" to counteract society's often negative images of African Americans, and want to return at the end of the day to a community which can help them cope with race-related job stress.¹³²

I call this complex desire for community "nostalgia," since it reflects a longing for the sense of community that existed prior to the civil rights movement. These integration skeptics seek the restoration of a community that can offer strong cultural identity, economic integration, and positive role models. In this sense, the so-called "separatist" vision is not outmoded at all, but specific to the post-civil rights context. Massey and Denton ignore this distinction. Also, the term "nostalgia" highlights the dangers inherent in an uncritical acceptance of visions of a happy, stable community when that community emerged in large part from the racial segregation and poverty Massey and Denton document. But the desire of some African Americans to find a community to buttress a world they see as racist and hostile deserves some respect. These feelings represent an understandable and legitimate reaction to the continuing racism that Massey and Denton's own work confirms. Such desires, rather than being merely ideological or self-serving, raise real questions about the risk of dismantling what remains of African American communities.¹³³

C. *The Pragmatic Answer? Integration As Ideology*

The risk facing integrationist ideology is that integration will fail to secure better housing, improved job prospects, or political empowerment for most of the African American poor. In other words, integration represents another race-specific remedy that inadequately addresses issues of class. Massey and Denton fail to demonstrate convincingly that despite the influence of continuing racism, integration will aid the inner-city poor more than spatial equality strategies would. Critiques of integration center on school desegregation's failure to secure better education for African American children; similarly, critics have argued that the battle for housing integration has often come at the expense of improved housing for the majority of African Americans. Massey and Denton do not offer solutions to the essential problem of white flight and resegregation that occurs when African Americans move into white neighbor-

nities, and such a desire is itself a manifestation of the harm segregation has wrought. P. 216 (quoting CLARK, *supra* note 12, at 63).

132. Calmore, *supra* note 59, at 1507.

133. Of course, black community has value beyond psychological benefits. Dismantling institutions can cause material economic harm. Derrick Bell points out that school desegregation often resulted in "closing black schools, dismissing black teachers, and demoting . . . black principals." BELL, *supra* note 6, at 109.

hoods.¹³⁴ These phenomena provide reasons to question Massey and Denton's proposed remedies. As with the nostalgia for community addressed above, many of the ineffectiveness fears have grown out of the post-civil rights consciousness.

1. *Integrated housing or affordable housing?*

Unfortunately, the fight for integrated housing has often come at the expense of better or more affordable housing for African Americans.¹³⁵ Much of the debate over whether to emphasize integrated or affordable housing focuses on integration-maintenance programs, which preserve racial balance by restricting the entry of African Americans into subsidized housing or into certain neighborhoods.¹³⁶ HUD currently has an affirmative duty to manage its federal housing programs to decrease racial concentration and to promote integration. Accordingly, when HUD or the courts reject applications for building public housing in neighborhoods with high minority concentrations, or refuse to allow would-be residents to rent units in certain buildings because their race is already well represented there, minority housing needs may remain unmet.¹³⁷ Considering the dearth of affordable housing for poor African Americans, this risk causes significant concern.

The *Gautreaux* litigation aptly reveals some of the conflicts between integration and affordability. Although the program benefitted participants, it has failed by many measures to aid most low-income African Americans who lack decent housing.¹³⁸ The Chicago Housing Authority, in an effort to thwart the *Gautreaux* court's orders, built no new public housing for fifteen years.¹³⁹ In fact, the development of the *Gautreaux* demonstration project has been the only significant step toward desegregation or housing improvement to result from the litigation.¹⁴⁰

In many ways, the debates over housing integration parallel similar debates in the context of educational integration. The failure of the school integration

134. Because of resegregation, African Americans can generally only enter a neighborhood in small numbers, inevitably resulting in tokenism. See notes 143-145 *infra* and accompanying text.

135. Black nationalists have long argued that "[t]he goals of integration are middle-class goals" that fail to address the problems of "the remaining black masses." CARMICHAEL & HAMILTON, *supra* note 77, at 53.

136. See generally Calmore, *supra* note 59; John O. Calmore, *Fair Housing vs. Fair Housing: The Problems with Providing Increased Housing Opportunities Through Spatial Deconcentration*, 14 CLEARINGHOUSE REV. 7 (1980); Goel, *supra* note 127; Michael R. Tein, Note, *The Devaluation of Nonwhite Community in Remedies for Subsidized Housing Discrimination*, 140 U. PA. L. REV. 1463 (1992).

137. Calmore, *supra* note 136, at 12-13. Calmore discusses the case of *Otero v. New York City Housing Authority*, 484 F.2d 1122 (2d Cir. 1973), which involved the housing authority's refusal to rent public housing units to nonwhite tenants in order to avoid "tipping" the racial balance of the project and creating "white flight." The 2d Circuit upheld this action, despite that fact that it deprived nonwhites of "available and desirable housing." Calmore, *supra* note 136, at 13. Calmore uses this example to suggest that spatial deconcentration strategies to prevent white flight will always risk depriving nonwhites of affordable housing because percentages of minority residents must be limited and controlled. See *id.* at 12-13.

138. See BELL, *supra* note 126, § 8.13.1.

139. Polikoff, *supra* note 109, at 459.

140. See Tein, *supra* note 136, at 1474-76.

campaign to ensure educational equality led some scholars, such as Derrick Bell, to suggest that a strategy that sought equal educational resources might ultimately have proved more successful.¹⁴¹ Equalization advocates note that civil rights attorneys sometimes pursued school integration even when this remedy contradicted the wishes of black communities that preferred equalization strategies.¹⁴² As a corollary, they argue that rather than spending energy futilely attempting to force courts to implement, and school districts to comply with, desegregation orders, lawyers would have better spent their time organizing parents and communities to implement equalization mandates.

As with education, integrated housing risks becoming an end rather than a means to the end of better housing and stronger neighborhoods. In that way, focusing only on integration may divert energy from galvanizing communities to demand equal resources.

2. *Resegregation and the problem of tokenism.*

The problem of resegregation and "white flight" presents a fundamental obstacle to efforts to implement spatial deconcentration and other integration-assuring strategies. Massey and Denton discuss the problem of resegregation, yet fail to suggest any solutions or to address the potential problem of "tokenism." Indeed, Massey and Denton's own data reveal that as the percentage of African Americans in a particular neighborhood increases, white demand for housing in that area decreases and white residents begin to move out. Their studies show that "the only urban areas where significant desegregation occurred during the 1970s were those where the black population was so small that integration could take place without threatening white preferences for limited contact with blacks."¹⁴³ Even African American suburbanization during the 1970s and 1980s, which followed the dismantling of some racial barriers, did not necessarily lead to racial integration. Rather, in many cases, whites fled the neighborhoods, and "suburban black enclaves" resulted.¹⁴⁴ The fear of white flight encourages "token integration": just enough diversity so that white residents do not feel unduly threatened. Housing mobility programs like the Gautreaux demonstration project are inherently tokenistic: first, because they have limited funding, and second, because they limit the number of participants to avoid white resistance and flight. Tokenism results in the worst of both worlds. It fails to address the housing and resource needs of most poor African American families, and it risks nullifying the social and psychological benefits that might flow from living in an African American community.¹⁴⁵

141. *E.g.*, BELL, *supra* note 6, at 110-12. Bell believes equalizing school facilities and resources and increasing black representation on school boards and other policymaking bodies are more effective remedies for unequal schooling than desegregation. *Id.* at 112.

142. See Derrick A. Bell, Jr., *Serving Two Masters: Integration Ideals and Client Interests in School Desegregation Litigation*, 85 YALE L.J. 470, 491, 505-06 (1976). Here Bell's critique focuses on the class action nature of school integration as a barrier to representing divergent interests.

143. P. 11.

144. P. 70.

145. A commentator writes: "Paradoxically, the very requirements for successful stable integration directly obviate such access for more than an extremely limited number of black households."

The specter of tokenism also raises concerns about black political power. Though a full discussion of this concern surpasses the scope of this book note, Massey and Denton raise issues that deserve attention. Massey and Denton believe antiintegration arguments based on the perceived threat integration poses to black political power stem purely from black politicians' self-interest. But certainly some black individuals genuinely fear that majoritarian politics will fail to represent their needs if tokenistic integration strategies relegate them to permanent minority status.¹⁴⁶ For example, poor people may have particularized needs such as subsidized housing, health care, and public transportation that middle-class Americans may not share. For poor African Americans, the "coalition building" Massey and Denton see as the alternative path to political empowerment may actually subvert their needs. Without fundamental voting reform,¹⁴⁷ dispersal of poor African Americans poses a significant danger that their political voices will not be heard.¹⁴⁸ Although Massey and Denton correctly point out that black political control of cities has not produced economic equality, they do not adequately confront the dangers that the alternative—tokenist integration—poses.

3. *Despair.*

Bayard Rustin once claimed that separatist ideology arises cyclically in African American history because of a sense of despair and frustration at the slow pace of racial progress.¹⁴⁹ Separatist ideology and ambivalence about integration might in fact represent a manifestation of the despair within African American communities at the limitations of integration-based strategies. Lurking behind many of the concerns about tokenism and the loss of community that integration can cause is a recognition that racial discrimination is not simply a historical relic, and that integration efforts have not led—and will not necessarily lead—to improvements in the quality of life for most poor African Americans.¹⁵⁰ For lawyers and students of law, this despair often grows out of

Robert W. Lake, *Unresolved Themes in the Evolution of Fair Housing*, in HOUSING DESEGREGATION AND FEDERAL POLICY, *supra* note 34, at 313, 323; cf. CARMICHAEL & HAMILTON, *supra* note 77, at 54 (arguing that integration "allows the nation to focus on a handful of Southern black children who get into white schools at a great price, and to ignore the ninety-four percent who are left in unimproved all-black schools").

146. Leigh & McGhee, *supra* note 130, at 36 ("To the extent that the movement of blacks from cities to suburban areas reduces their numbers in inner-city voting jurisdictions, they are reducing their power as the plurality or majority of voters in certain wards.").

147. See generally Lani Guinier, *The Triumph of Tokenism: The Voting Rights Act and the Theory of Black Electoral Success*, 89 MICH. L. REV. 1077 (1991) (critically examining the theory that proportionate black representation leads to achievement of desired reforms and proposing a proportionate-interest representation alternative).

148. Georgia A. Persons, *Racial Politics and Black Power in the Cities*, in THE METROPOLIS IN BLACK & WHITE: PLACE, POWER AND POLARIZATION 166, 185-86 (George C. Galster & Edward W. Hill eds., 1992) (arguing that blacks are disadvantaged in the politics of suburbs).

149. RUSTIN, *supra* note 78, at 157.

150. For anecdotal evidence of this sentiment, see Cosby, *supra* note 123, at 13A ("Integration has not translated into economic and social justice for the masses of African Americans What the civil rights community does not want to come to grips with is how token integration has helped to facilitate the growth of the African American poor."); Judith Lynn Howard & Gregory Katz, *Finding Common Ground: U.S. Integration Problems Foreshadow Challenge for South Africa*, DALLAS MORNING NEWS,

frustration with the limits of litigation as a tool for social change. For example, even in the *Gautreaux* litigation the "victory" has been bittersweet. The plaintiffs won their case only after a protracted battle and only after Dorothy Gautreaux, the named plaintiff in the case, had died.¹⁵¹

Although Derrick Bell's work most consistently expresses this despair at the limits of antidiscrimination litigation,¹⁵² other civil rights commentators have also included the theme of despair in their scholarship.¹⁵³ In fact, the despair of the post-civil rights era seems more profound than the historic cyclical despair Rustin reported, perhaps precisely because the magnitude of the battles civil rights crusaders fought and won was so great. As the weapons of antidiscrimination law lost their force, a new sense of impotency invaded the once-enthusiastic spirits of civil rights activists and scholars who had once "dared to dream" that their children's lives would be better than their own.¹⁵⁴ The post-civil rights despair seems more profound in that it incorporates Rustin's notion of historical cycles into its disheartening recognition that racial progress itself *is* cyclical. This realization renders racial equality all the more elusive; racism in this model serves not as an "aberration" in American history, but as a fixture on the American landscape.¹⁵⁵

4. *Integrationist ideology.*

Although Massey and Denton dismiss their critics' views as mere products of separatist ideology, their own vision of integration also rests on an ideological foundation. Traditionally, African American leaders and other progressive

Nov. 15, 1992, at 22P ("Some African Americans are less interested in integration than they were 20 years ago because the civil rights movement has failed to bring economic parity.") (paraphrasing the statement of Terry Flowers, principal of a predominantly black private school that emphasizes African history).

151. BELL, *supra* note 126, § 8.13.1, at 769 n.12 (quoting Professor Henry McGee); see also Tein, *supra* note 136, at 1473-75 (discussing the lengthy litigation and slow implementation of judicial decrees in *Gautreaux*).

152. Bell writes:

With the realization that the salvation of racial equality has eluded us again, questions arise from the ashes of our expectations. How have we failed—and why? What does this failure mean—for black people and for whites? Where do we go from here? Should we redirect the cause for racial justice?

BELL, *supra* note 6, at 3. Bell maintains that although "racism is permanent," he will refuse to give in to despair, preferring hope and defiance. DERRICK BELL, *FACES AT THE BOTTOM OF THE WELL: THE PERMANENCE OF RACISM* 12, 197 (1992).

The limitations of civil rights litigation stem, in part, from civil rights attorneys' failures to employ multiple strategies and to respond to their clients' interests, and, more generally, from the limits of law as a vehicle for social reform. See generally GERALD P. LÓPEZ, *REBELLIOUS LAWYERING: ONE CHICANO'S VISION OF PROGRESSIVE LAW PRACTICE* (1992); Gerald P. López, *Reconceiving Civil Rights Practice: Seven Weeks in the Life of a Rebellious Collaboration*, 77 GEO. L.J. 1603 (1989). In both works, López discusses how public interest lawyers can better produce reform by incorporating the range of experiences and aspirations their clients hold.

153. See Frances Lee Ansley, *Stirring the Ashes: Race, Class, and the Future of Civil Rights Scholarship*, 74 CORNELL L. REV. 993, 999-1010, 1045-46 (1989) (discussing themes of pessimism and despair in civil rights scholarship).

154. *Id.* at 1003.

155. BELL, *supra* note 152, at 196-97 (1992) ("Our national history has continued to amplify the myths of automatic progress, universal freedom, and the American dream without the ugly reality of racism seriously challenging the faith.") (quoting NATHAN HUGGINS, *BLACK ODYSSEY* 244 (1990)).

persons have supported integration for two primary reasons: first, because of the contact hypothesis, which postulates that interaction between African Americans and whites necessarily leads to greater mutual understanding and racial progress,¹⁵⁶ and second, because of pragmatic concerns that suggest that resources will never flow into predominantly black communities.¹⁵⁷

Massey and Denton advance the second rationale. They argue that integration is necessary to allow coalition building among African Americans and other groups. The authors argue that white citizens currently have no self-interest in improving the socioeconomic status of African Americans; appeals to white citizens therefore depend on "altruism, guilt, and fear," insufficient bases for "concerted political action."¹⁵⁸

On the other side of the debate, integration skeptics argue that integration's failure—analyzed above in terms of tokenism and the destruction of African American communities—lies in its inability to challenge the central problem of white dominance and hegemony. This separationist rhetoric certainly dominated the black power movement, which often relied on a metaphor of colonialism to describe the condition of African Americans in the United States.¹⁵⁹ For black nationalists, African Americans' distinctive history of oppression meant that they could not simply follow the same path to assimilation that other ethnic groups took. Accordingly, to them, integration necessarily signified subjugation. From this perspective, solving African American poverty first requires community empowerment to alter the power dynamics between African American and white communities.¹⁶⁰

As Massey and Denton point out, this alternative understanding of race relations also has its limits. First, black nationalism's dependence on racial essentialism makes it susceptible to use as a regressive or conservative force as well as a progressive one. Second, by emphasizing community self-help, black nationalism arguably fails to claim African Americans' fair share of the nation's resources from the larger society. Finally, changing demographics have challenged the utility of a separatist model. As African Americans gradually come to share their communities with lower-income Latinos, Asian Americans, and other people of color, the model loses force. However, many of the insights the colonial metaphor embodies retain significance today (and in fact often apply to other groups of color as well). Twenty years after the swift rise and fall of the black power movement, the colonial metaphor still undergirds the reasoning of those who criticize a single-minded focus on integration. Bell,

156. Goel, *supra* note 127, at 387; see also HAROLD CRUSE, *PLURAL BUT EQUAL: A CRITICAL STUDY OF BLACKS AND MINORITIES AND AMERICA'S PLURAL SOCIETY* 35 (1987) (noting that although "interracial conviviality" within such places as fast-food restaurants and department stores is certainly integration of a sort, such measures fall far short of "full integration"); Robert K. Fullinwider, *Race and Equality*, in *THE MORAL FOUNDATIONS OF CIVIL RIGHTS* 3, 3-4 (Robert K. Fullinwider & Claudia Mills eds., 1986) (observing that the simple goal of the Civil Rights Act of 1964 was to remove basic barriers to white/African American intermingling).

157. Orfield, *supra* note 34, at 20.

158. P. 160.

159. CARMICHAEL & HAMILTON, *supra* note 77, at 2-32 (comparing the situation of blacks in America to that of a colonized nation).

160. See Peller, *supra* note 80, at 808.

for example, maintains that school desegregation strategies ultimately failed to challenge effectively the "white domination of public education."¹⁶¹ Similarly, in the context of housing, Calmore writes: "Integrationists too often see segregation as a result of mere discrimination; I see it as primarily a result of *domination* and exclusion. . . . The white desire to exercise this power remains strong today, especially when directed to poor, urban blacks."¹⁶² Therefore, Calmore argues, integration remains inherently tokenistic in its failure to challenge this domination directly.¹⁶³

From this vantage point, Massey and Denton's vision offers a competing ideology, but by no means a *necessary* one. The standard critiques of integration amply demonstrate the flaws in Massey and Denton's prescriptions. If their remedy proves pragmatic, it is not because it raises the class standing of the African American community as a whole "nation," but because it offers aid to a limited number of individuals attempting to flee bad conditions. This criticism harks back to Massey and Denton's inability to comprehend critiques of black middle-class flight: To the extent that their vision of mobility relies on individual or tokenized flight, it cannot explain how to remedy the plight of those left behind. Thus, the central problem with Massey and Denton's justifications for integration is that integration is only politically pragmatic to the extent that it is tokenist; beyond that, it will likely be resisted.¹⁶⁴ If integration is necessarily tokenist, one is left questioning the pragmatism of integration—what is it pragmatic in achieving?¹⁶⁵

III. THE CHALLENGE OF RAISING RACE

Massey and Denton argue convincingly that racism is not a mere relic of the past and that efforts to explain persistent poverty among African Americans cannot divorce race from class. Unfortunately, in announcing their remedy, Massey and Denton rehash old recommendations and theories without articulating a new vision accounting for the changing circumstances of the post-civil

161. BELL, *supra* note 6, at 112 (emphasis added).

162. Calmore, *supra* note 59, at 1499 (emphasis added).

163. See *id.* at 1499, 1517.

164. If Massey and Denton's proposed comprehensive strategy to dismantle segregation is meant as an answer to the problems of tokenized integration, they fail to show what will motivate policy makers to implement it. As one commentator contends, "Racial segregation and discrimination persist for the obvious reasons that they are in someone's best interest and their elimination will cost more than decision makers can easily risk." John M. Goering, *Concluding Remarks, in HOUSING DESEGREGATION AND FEDERAL POLICY*, *supra* note 34, at 327, 332. Thus "altruism, guilt, and fear" must also be the motivation for a comprehensive dismantling of the ghetto. See text accompanying note 158 *supra*. Massey and Denton acknowledge this somewhat by concluding that their recommendations require the "moral commitment of political leaders," p. 235, and by their appeal to a broader notion of self-interest: "Until we face up to the difficult task of dismantling the ghetto, the disastrous consequences of residential segregation will radiate outward to poison American society." P. 236. But if we had the moral commitment to address issues of race and class, both integration and spatial equality could be pursued. Conversely, without this moral commitment, neither strategy is politically viable.

165. Lake, another housing commentator, asks, "Is the amount and type of integration that could be achieved under these constraints—that is, comprising very low black concentrations and consequently available to relatively small numbers of black households—a worthwhile policy objective?" Lake, *supra* note 145, at 324.

rights movement era. This recent political context has led many people to question the very strategies Massey and Denton advocate. Had the authors adequately considered these changes in context, they might have addressed the shortcomings of previous integration-oriented strategies and grappled with the limits of the strategies they propose. Perhaps this consideration could have provided a new vision to move the debate forward. Instead, Massey and Denton leave many questions unanswered. For example, what will motivate America to implement the Kerner Commission recommendations that it failed to implement before?

For Massey and Denton, the answers lie in more systemic enforcement of civil rights laws and in the expansion of housing mobility programs. But Massey and Denton do not adequately address the immense social transformation necessary to sustain a full-scale and effective housing desegregation effort. The authors do not articulate any strategy that promotes a direct confrontation of racial and economic power imbalances in society or more involvement by members of the "underclass" themselves. Unfortunately, nobody can predict perfectly which strategies will work and which will not, so the best approaches will employ a variety of alternatives. The eradication of housing discrimination should, as Massey and Denton recommend, stand high on the nation's agenda to ensure that African Americans retain the freedom to choose where to live, particularly to pursue jobs moving out of inner city neighborhoods. However, insisting on integration as a *necessary* strategy and pursuing it singlemindedly may unduly weaken community and the little bit of political control African Americans have achieved without gaining much in exchange. Spatial deconcentration becomes the paradigm of this limiting and limited vision of integration. Individual African Americans who participate in housing mobility programs gain the benefits of integration, but most poor African Americans are left behind. Similarly, Massey and Denton's recommendation that African Americans take the path of other groups by participating in coalition politics seems to beg the question of how this can actually happen and whether and how shared interests between the groups can actually exist.

As a consequence, in order to formulate a workable solution, we have to engage in a struggle on a variety of fronts, recognizing the limits of each strategy. Here, I am reminded of the constant invocation of Kenneth Clark by many of the writers and theorists cited in this review. Clark's observations about black ghettos surface in Wilson's theories, Massey and Denton's insistence on integration, culture of poverty theories, black nationalism, and Derrick Bell's despair. Although Kenneth Clark could be characterized as an integrationist, the following passage might elucidate how his observations about the ghetto could lead to such divergent prescriptions on how to improve the plight of the underclass. Clark writes:

It is a temptation to try to select the particular strategy which will guarantee the solutions of the ghetto's multiple problems, but to succumb to this temptation inevitably drives one into some of the many fantasies or fanaticisms of the ghetto. Probably the ghetto's ills are not to be cured by any presently known single remedy. . . . But the chances for any major transformations in the

ghetto's predicament are slim until the anguish of the ghetto is in some way shared not only by its victims but by the committed empathy of those who now consider themselves privileged and immune to the ghetto's flagrant pathologies. If this social sickness is not fatal, then the combined energies and strategies of understanding and power in the society as a whole must be mobilized and given the force of sustained action to achieve actual changes in the ghetto so its people have a realistic basis for a life of humanity and dignity. If racism has so corroded the American society that this is no longer possible, then no strategy or combination of strategies can transform the ghetto and save the society. In facing the future of the American ghetto, one cannot allow oneself the luxury either of hope or of despair.¹⁶⁶

To follow through on Clark's ambivalent charge requires not just a recognition of a multiplicity of strategies but a more transformative vision of social change. Visions of social change that encompass only static notions of pragmatism and political acceptability will likely never help the so-called "underclass." As Massey and Denton's analysis should make clear, the underclass concept represents the convergence of two issues traditionally considered by most white Americans to be politically unacceptable to tackle: racism and poverty. Any recommendations for addressing the plight of the underclass can be viewed as politically inexpedient and/or ineffective. Doubters will claim that no one will invest in strategies to aid the urban poor,¹⁶⁷ that white Americans will never choose to live alongside substantial numbers of African Americans,¹⁶⁸ that race-specific policies will never (or no longer) receive political support,¹⁶⁹ that black capitalism or community self-help will never provide sufficient employment opportunities for African Americans,¹⁷⁰ and, finally, that the more Wilson's universal nonracial policies are politically palatable, the less likely they will actually benefit poor blacks.¹⁷¹ That any strategy might be ineffective suggests that remedying African American poverty requires more than strategic choices of policy; it requires direct confrontation of race and classism in our society. Massey and Denton seem to deal with a symptom of the problem—housing discrimination—and gloss over the fundamental problem. A direct

166. CLARK, *supra* note 12, at 222.

167. Orfield, *supra* note 34, at 20.

168. Calmore, *supra* note 59, at 1499; *see also* CARMICHAEL & HAMILTON, *supra* note 77, at 53-56.

169. WILSON, *supra* note 2, at 12.

170. *See* BELL, *supra* note 6, at 218-21 (fictional tale depicting the alarm and fear whites felt after blacks achieved success through self-help, and comparing the reaction of whites—which includes violence against African Americans—to the real hostility of Southern whites towards blacks during the period of Reconstruction); *see also* BAYARD RUSTIN, *The Failure of Black Separatism*, in *DOWN THE LINE: THE COLLECTED WRITINGS OF BAYARD RUSTIN*, *supra* note 78, at 291, 296-97 (arguing that black capitalism and community control are futile because these communities will never have the money required to run competitive businesses or remedy poverty, inadequate housing, and unemployment).

171. BELL, *supra* note 6, at 135 (suggesting that class-based, as opposed to race-based, reparations might not work because "spreading the resources so broadly as to dilute dissent means that the basic racial remediation is lost. . . . If everyone moves up one notch on the ladder, blacks will remain below their white counterparts, vulnerable to all the disadvantages of their subordinate status."); Albert G. Mosley, *Affirmative Action and The Urban Underclass*, in *THE UNDERCLASS QUESTION* 140, 148 (Bill E. Lawson ed., 1992) (arguing that Wilson "takes it as an act of faith" that his proposed nonracial full employment policies would appropriately serve the needs of the black urban underclass).

confrontation to both racism and classism requires an earnest inclusion of the voices of the "underclass,"¹⁷² who in Massey and Denton's analysis seem only to exist as a pathological "other"—incapable of protest against oppressive conditions. It also requires the creation of a new politics founded not on self-interest and a static notion of "pragmatism," but rather on the recognition that the underclass are more than just "problem people"; they are a "constitutive element[]" of American life.¹⁷³ "Our" spiritual, moral, and economic health as a nation is inexorably linked to "their" plight. As Cornel West has prophesied: "If we go down, we go down together."¹⁷⁴

172. See note 152 *supra*.

173. CORNEL WEST, RACE MATTERS 2-3 (1993) (discussing views of race and "the presence and predicaments of black people").

174. *Id.* at 4.