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Integration as a Means of Restoring Democracy and Opportunity

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This paper was presented as part of Panel 1 at the symposium, entitled "Defining Objectives and the Rationale for Action."

 $@\ 2017\ President\ and\ Fellows\ of\ Harvard\ College$

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"This innocent country set you down in a ghetto in which in fact it intended that you should perish ... the heart of the matter is here, and the root of my dispute with my country."

James Baldwin
The Fire Next Time

Introduction

I am a law professor, not a social scientist. In my academic discipline, I am allowed to have intuitions or theories for why things are, even if I do not have empirical proof. In that spirit, this essay presents my intuitions and some social science research about the damage that segregation does to individuals and the nation. Explaining the role of physical separation in undermining race relations, democracy, and opportunity also makes the case *for* integration.

Intentional effort at integration and inclusion is necessary for fixing what is broken in this country. I begin by explaining the role of racist ideology and propaganda about black and brown bodies in institutionalizing segregation. I then turn to the consequences of segregation for politics, opportunity, and human relations, exploring the very difficult challenges to creating public support for integration. People of all colors often desire racial comfort and maximum opportunity. This and fear, particularly of poor black people, are at the heart of the matter. In the final section of this essay, I speculate about the possibilities for transcending fear and explain the emergence of "culturally dexterous" whites that have less need for the racial comfort of a predominantly white neighborhood. In my dreams, I imagine a future in which coalitions of progressive people of color and culturally dexterous whites fight together for the public policies that promote and sustain integrated neighborhoods and schools. At bottom, I hope to show why such integration is necessary to restoring both democracy and opportunity in America.

What is Broken: The Role of Racist Ideology and Propaganda

Donald Trump began his campaign for the presidency with a speech that cast Mexicans as rapists, part of his bid to ingratiate himself with voters who dislike or fear undocumented immigration. During a debate, he associated "the blacks" with "inner cities," which he

described as "a disaster education-wise, job-wise, safety-wise, in every way possible." Both of these stereotypes, of Mexicans and African-Americans, are premised, in differing ways, on the divergence of these groups from a presumed norm of dominant American whiteness.

That norm, sometimes unspoken or dog-whistled, sometimes stated plainly by avowed white supremacists or nationalists, was constructed and reified for centuries. It predates the old Jim Crow. The ideology of white supremacy—created and propagated by patriarchs—required separation in all forms of social relations. The ideology told whites in particular that they could not marry, sleep with, live near, or play checkers with, much less ally in politics with a black person. It built a wall that supremacists believed was necessary to elevate whiteness above all else. A dominant whiteness constructed by law and often backed by racial terror was embedded in people's habits.

This ideology was the organizing plank for regimes of oppression that were essential to American capitalism and expansion—from slavery, to indigenous and Mexican conquest, to exclusion of Asian and other immigrants, and later to Jim Crow. Lawgivers constructed whiteness as the preferred identity for citizen and country and then set about protecting this fictional white purity from mixture. Segregation law began with penalizing interracial sex in the seventeenth century. Over the next three centuries, our nation was caught in a seemingly endless cycle of political and economic elites using law to separate light and dark people who might love one another, or revolt together against supremacist regimes created by the economic elite.²

As Gunnar Myrdal would write in his classic treatise on America race relations, *An American Dilemma*, the central animating rationale for the regime of Jim Crow segregation was the fear of black men having sex with white women.³ It was easy to use this ruse to garner widespread support for segregation. False accusations against black men would regularly incite lynching. The ideology of supremacy animated not only Jim Crow, but also eugenics laws authorizing state-enforced sterilization of undesired populations, as well as a

^{1.} Mock (2016).

^{2.} Cashin (2017).

^{3.} Myrdal (1944).

1924 federal law that banned or severely restricted immigration for all nationalities except people from northern Europe. Limiting immigration of colored and olive people, forcing sterilization, and forcing separation by Jim Crow laws and private practices would continue for much of the twentieth century, and all of it redounded to the benefit of white upper classes.⁴

The Supreme Court's landmark case of Village of Euclid v. Ambler Realty was decided in 1926. In it the court condoned what is now referred to as "Euclidian zoning," endorsing the idea that certain uses of land, like duplexes, were "parasitic" on single-family homes and the people who lived there and therefore should be separated from these idealized neighborhoods. The court had banned racial zoning in Buchanan v. Warley in 1917, but Euclidian zoning and other practices like racially restrictive covenants and unregulated racial discrimination would accomplish the widely held goal of residential racial segregation. Physical segregation, like the vanquished regime of anti-miscegenation, is also a legacy of our nation's multi-century effort to construct and insulate whiteness. The history of orchestration and intention behind physical segregation is beyond the scope of this essay but has been told by many. 5 Suffice it to say that an ideology of supremacy animated this orchestration, and the architecture of separation endures. As Maria Krysan and co-authors argue in their paper for this symposium, both discrimination against renters and buyers and racially biased preferences by those seeking housing contribute to segregation. Race continues to shape housing markets, as do weak antidiscrimination enforcement and exclusionary zoning in which affluent towns intentionally prevent affordable housing, even market-rate apartments, from invading their turf. These practices and zip code profiling, which steers commercial and retail investment toward overwhelmingly white, poverty-free areas, enable current masters of the universe, and others with choices, to insulate themselves from populations they do not want to deal with.6

In 2017 racial polarization and contestation remain. Gerrymandering segregates politics. The average Republican congressperson represents a district that mirrors the overwhelmingly white America of 1972, while the average Democrat represents a district that

^{4.} Cashin (2017).

^{5.} Rothstein (2017); Cashin (2004); Massey and Denton (1993); Jackson (1985).

^{6.} Cashin (2004), ch. 3.

looks like the projected diversity of America in 2030.⁷ The end result is a clash of distinctly different worldviews—the difference, say, between those who resented and those who loved a Super Bowl commercial featuring "America the Beautiful" sung in seven different languages. In a segregated nation where many people and the leaders who represent them get little practice at pluralism, democracy is broken.

The Consequences for Opportunity

Segregation not only damages democracy, it undermines opportunity. The "American dream" is also broken for many in the United States. As underscored in the framing paper for this symposium and the recent work of economists and others, place—where one lives—greatly affects opportunity. Only about 30 percent of black and Latino families reside in middle-class neighborhoods where less than half of the people are poor. Meanwhile, more than 60 percent of white and Asian families live in environs where most of their neighbors are not poor. The majority of whites and Asians live in neighborhoods with a poverty rate below 14 percent. As urban sociologist John Logan puts it, "It is especially true for African Americans and Hispanics that their neighborhoods are often served by the worst-performing schools, suffer the highest crime rates, and have the least valuable housing stock in the metropolis."

Five decades of social science research demonstrate what common sense tells us. Neighborhoods with high poverty, limited employment, underperforming schools, distressed housing, and violent crime depress life outcomes. They create a closed loop of systemic disadvantage such that failure is common and success aberrational. Even the most motivated child may not be able to overcome unsafe streets, family dysfunction, a lack of mentors and networks that lead to jobs and internships, or the general miasma of depression that can pervade high-poverty places. One study found that a high-poverty neighborhood virtually guarantees downward mobility. Living in a severely disadvantaged neighborhood impedes the development of verbal cognitive ability in children, correlates to a loss of a year of learning for

^{7.} Cashin (2014), Beacon Press, ch. 1.

^{8.} Logan and Stults (2011), 21.

^{9.} Sharkey (2009).

black students, and lowers high school graduation rates by as much as 20 percent. ¹⁰ Most of the families living in urban, high-poverty neighborhoods have been stuck there for generations. ¹¹

At the other extreme, those privileged to live in high-opportunity neighborhoods rise easily on the benefits of exceptional schools and social networks. Anyone who has spent time in high-opportunity quarters knows intuitively what this means—the habits you observe, the people and ideas you are exposed to, the books you are motivated to read. Segregation of the highly educated has increased even faster than that of the affluent. As of 2009, according to census data, only seventeen counties in America had a population in which more than half are college educated. College graduates living in America's most highly educated metro areas are more residentially isolated than African Americans. ¹²

The same forces that create geographic disadvantage for many blacks and Latinos also disadvantage struggling white people. In an American metropolis stratified into areas of low, medium, and high opportunity, place is a disadvantage for anyone who cannot afford to buy a home in a premium neighborhood. One study found that only 42 percent of American families now live in middle-income neighborhoods, down from 65 percent in 1970. His is due to the rising segregation of the affluent and the poor from everyone else. As the framing paper discusses, income segregation has grown fastest among black and Hispanic families, and high-income families of all races are now much less likely to have middle- or low-income neighbors. Concentrated poverty neighborhoods and the number of people living in them have risen dramatically since 1970. And concentrated poverty is growing fastest in the suburbs.

What happens in a society in which income and wealth are increasingly concentrated in certain neighborhoods? Bastions of affluence tend to create disadvantage elsewhere.

Douglas Massey invokes Charles Tilley's phraseology and calls it "opportunity hoarding."

^{10.} Sampson (2008); Wodtke, Harding, and Elwert (2011).

^{11.} Sharkey (2013).

^{12.} Domina (2006), 394.

^{13.} powell (2002).

^{14.} Reardon and Bischoff (2011).

^{15.} Kneebone and Berube (2013), 18; Elizabeth Kneebone, Nadeau, and Berube (2011).

Massey argues that where social boundaries conform to geographic ones, the processes of social stratification that come naturally to human beings become much more efficient and effective. In his words: "If out-group members are spatially segregated from in-group members, then the latter are put in good position to use their social power to create institutions and practices that channel resources away from the places where out-group members live." The same power can be used to "direct resources systemically toward ingroup areas." Segregation puts affluent, high-opportunity places in direct competition with lower-opportunity communities for finite public and private resources. And affluent jurisdictions are winning, sometimes because they are subsidized by everyone else. 17

Rising geographic separation of the affluent, then, appears to contribute to rising inequality. ¹⁸ It is not surprising that both income inequality and income segregation rose at the same time. As those with power to set wages for others became ever more residentially isolated from people who really need their paychecks, CEO-to-worker pay rose precipitously, increasing 875 percent between 1978 and 2012. ¹⁹

Meanwhile, places with a sizeable middle class that enable poor families to live among them have higher rates of upward mobility for poor children. ²⁰ And yet segregation, and the parochial benefits that come with it for those living in poverty-free havens, undermine the willingness of many to try integration. As one town councilman in a distressed older suburb bemoaned, "We've lost that sense as Americans that we can all live together and that's part of what's made the inequality in this country so crass and gross. People don't want to be around each other anymore." ²¹

As the framing paper sets out, integration produces ample social and economic benefits, including reducing racism. While there are many valid arguments advocating for increased equity of opportunity between advantaged and disadvantaged places and people, these advocated must acknowledge that segregation is an underlying cause of the political

^{16.} Massey (2007), 19.

^{17.} Cashin (2004).

^{18.} Reardon and Bischoff (2011).

^{19.} Sabadish and Mishel (2013).

^{20.} Chetty et al. (2013).

^{21.} Rotondaro (2015).

constraints to procuring more equity. Affluent people concentrated in advantaged enclaves don't volunteer to pay more taxes to invest in other people's children or other jurisdictions' needs. At minimum, integration and equity advocates should acknowledge that the goals of equity and integration are not mutually exclusive. Coalitions to support integration are likely to have many natural reasons for supporting more equitable investments in disadvantaged places.

Integration weariness is common among black folk, perhaps as much as integration wariness or avoidance is common among non-dexterous whites (as I describe in the next section). Integration weariness on the part of African Americans may stem from being tired of being disappointed by an America that has not lived up to the ideals of *Brown v. Board of Education*. It may also stem from exhaustion with anti-black micro- and macro-aggressions. Whatever the source of integration weariness, by whoever harbors it, here is a hard truth: we can't fix what is broken in politics, in human relations, in disparate opportunity, without addressing a fundamental underlying cause: segregation. There are many public policies that help promote integration and have been shown to produce successes, including inclusionary zoning (Montgomery County, MD) and magnet schools (The Sheff Movement, Hartford metropolitan area). What is missing is more political will, and there are pointed reasons for this lack of support.

The Challenges to Creating Public Support for Integration

Dr. Robin DiAngelo, an anti-racism scholar and educator, coined the term "white fragility" to describe "a state in which even a minimum amount of racial stress becomes intolerable, triggering a range of defensive moves." Segregation fuels it. Most whites in America live in majority-white settings. As the framing paper points out, the average white person lives in a neighborhood that is 76 percent white. For segregated whites, their social environment "protects and insulates them from race-based stress," DiAngelo writes. Such insulation "builds white expectations for racial comfort while at the same time lowering the ability to tolerate racial stress." "Racial stress," she continues, "results from an interruption to

what is racially familiar."22

We don't like to admit that the ideology of white supremacy is still with us in the expectations that many whites have. Expectation of racial comfort, of white dominance, may explain why most whites still state preferences for majority-white neighborhoods. As the framing paper points out, in 2001, the threshold at which whites would likely avoid purchasing a home in a neighborhood was 15 percent blackness. Hopefully in 2017 whites' capacity for neighborhood exposure to black people has risen. But whatever the threshold for avoidance is today, it is important to consider the *reasons* for such avoidance. Black people remain the group all non-blacks are least interested in integrating with. Why? Allow me to speculate.

Social psychologists have documented implicit associations of blackness with criminality. ²³ While the stereotype of the black male sexual predator helped justify the old Jim Crow, I believe a modern stereotype of the "ghetto dweller" or "ghetto thug" is part of both the spoken and unspoken subtext of fair housing debates. There is a spatial dimension to antiblack stereotyping that goes beyond class. Residents of hyper-segregated neighborhoods are more likely than other groups to be black. ²⁴ Hyper-segregation facilitates a unique form of othering. To be "ghetto" has a widespread negative connotation in America, one that many if not most people of all colors disassociate from.

There are codes of the street, incubated in areas of concentrated black poverty, which some black males feel pressured to adopt as a mode of personal survival. ²⁵ Such codes, participated in by a small subset of black urban residents, glorified in gangsta' rap, propagated in near-constant news stories about urban crime, may explain widespread fear of black males. My mild-mannered, slight, conventionally-dressed, Harvard-educated husband watches women cross the street when he encounters them on the sidewalk. An African-American man who lives in a tony suburb speaks of the dramatic difference in how he is treated when he walks the neighborhood with and without his family, even among

^{22.} DiAngelo (2011), 54, 57-65.

^{23.} Kang (2005).

^{24.} Massey and Denton (1993).

^{25.} Coates (2013).

neighbors who know him. When he walks solo, he says, he becomes a "thug." ²⁶ Only a relatively small number of census tracts might be called a "ghetto," whether by folk who live elsewhere who are casting aspersions or by residents themselves who may use the term to describe their reality (I have heard both).

Despite its European origins, in the United States the word is associated not just with concentrated poverty but also with blackness. Demographers use a threshold of 40 percent poverty to define concentrated poverty and, as the framing paper points out, the number of these census tracts has risen from about 2,500 in the year 2000 to 4,400 in 2009-2013. Below is a table of extreme poverty census tracts with some of the features associated with ghettoes—very high levels of household and child poverty, violence, single motherhood, boarded or vacant properties, to name some of the potential indicia. The table underscores that not all of the most distressed, concentrated poverty census tracts are predominantly black, though many of them are. Such places, small in number, loom large in the American psyche and in American race relations. They contribute to continued fear and loathing about black bodies, and sometimes middle- and upper-class black people are participating in the othering. Even in Washington, DC, where Democrats outnumber Republicans by about 12 to 1, and where African Americans for many years controlled government, political leaders pursued punitive laws that fueled mass incarceration and filled DC prisons with young black men.²⁷ The same black political leadership was also slow to adopt an inclusionary zoning ordinance and pursued policies that displaced many poor residents from the city.²⁸

^{26.} NPR Staff (2014).

^{27.} See, for example, Forman (2017).

^{28.} See, for example, Nevins (2015); Samuels (2013); Andersen (2014).

Table 1. Sample U.S. neighborhoods with high levels of poverty, violence, and other features possibly associated with "ghetto"

Census Tract Number	Neighborhood	Percentage Poor (2014 American Community Survey, Census Bureau)	Violent Crime Rate Per 1000 people (Uniformed Crime Report/ local precinct reports)	Ethnic makeup (2010 Census)	Percentage of Households run by Single- Mothers (2010 Census)	Kids in Poverty (ACS)	Vacant Houses (American Housing Survey)	Percentage of Workers in Service Sector (ACS)
540101	Altgeld Gardens, Chicago, Ill	60.80%	99.02	94% African American	62.20%	76%	37.40%	54.70%
170200	Baltimore, MD (State Center Metro around N. Martin Luther King Blvd.)	54.60%	91.03	91% African American	73.9%	57.40%	17.20%	61.7
357300	Indianapolis, IN (South of Fountain Square)	40.80%	84.30	29.8 % African American, 12% Hispanic, 58% White	22%	67.5%	15.30%	47.20%
0029000	Toledo, OH (LaGrange St./Water St.)	82.70%	77.30	55% African American, 26% Hispanic, 24% White	26.6%	89.20%	17.30%	26.10%
001000	Rockford, Ill (Kishwaukee St.)	62.70%	75.80	44% African American, 17% Hispanic, 22% White,	55.8%	78%	42.20%	38.50%
114300	Cleveland, OH, (Kinsman Rd.)	87.10%	70.30	98% African American	66.50%	88.10%	27.10%	38.60%
026900	Cincinnati, OH (Central Parkway)	47.30%	67.05	87% African American	66.4%	84%	47.60%	39.60%
009801	Washington, DC (Washington Highlands)	42.60%	66.67	97% African American	73.1%	61.90%	22.50%	29.80%
500400	E. St. Louis (Caseyville Ave.)	48.40%	66.27	97.7% African American	55.6%	97.50%	22.90%	34.60%
000500	Anniston, Alabama	58.50%	62.57	91.7% African American	31.6%	80.90%	38.9	37.70%
001501	Liberty City, Miami, Fl	63.9%	59.64	89.5% African American	50.30%	83%	22.90%	38.60%
543800	Detroit, MI (Kendall Dr., Outer St.)	67.5%	60.89	75% African American, 18% White	30.6%	81.8%	52.5%	35.8%

Concentrated poverty, particularly of the black kind, contributes to the flight of those who have the choice to flee to perceived higher ground. ²⁹ Families with children are especially motivated to avoid high-poverty schools or neighborhoods, such is the fear that a child will be caught in the undertow of downward mobility associated with concentrated poverty and described above in the section on disparate opportunity. ³⁰ Elsewhere I have described the intentional public policies that created concentrated black poverty. ³¹ Had governments not intentionally created black ghettoes, I suspect we would be much further along in the project of dismantling Jim Crow. If you, the reader, can indulge yourself in the thought experiment of a nation without ghettoes, perhaps you can also imagine the wider range of choices people of all classes and races might have for schools and neighborhoods in a ghetto-free nation.

Blackness would be less likely to be associated, consciously or unconsciously, with hysterical negatives. Policies and preferences of avoidance might be less common and individuals and institutions less risk averse, more willing to try to enter or invite robust diversity. Above all, poor black people might be more apt to be seen as three-dimensional human beings, worthy of the moniker "citizen."

Of course, poor black people are not the only subgroup subject to stereotyping and exclusion. A small minority of poor whites, 7.5 percent according to the framing paper, live in concentrated poverty, compared to a quarter of all poor blacks and 17.4 percent of poor Hispanics. With some suburbanization of concentrated poverty, and the winnowing out of working- and middle-class jobs in many places, there is an emerging conception of poor white dysfunction, of a white underclass that is also defined by geography. They live apart from and are not well understood by coastal elites. This is part of the distinct cultural binary that animated the 2016 election. Those who live far away from distressed communities—whether rural, suburban, or inner-city—can develop a lack of empathy for struggling people, a sense that they are "deplorable" and undeserving of policy interventions or real inclusion. Segregation, then, is both a symptom and a cause of race

^{29.} Massey & Denton (1993).

^{30.} Cashin (2014), ch. 2.

^{31.} Cashin (2004), ch. 7.

^{32.} See, for example, Murray (2012).

and class tensions in America.

Transcending Fear: The Rise of the "Culturally Dexterous"

Given the enduring effectiveness of divide-and-conquer, dog-whistling politics, I have little hope of a class-consciousness arising to unify struggling people of all colors. I am, however, optimistic about the possibilities for creating ascending coalitions of culturally dexterous whites and progressive people of color that could fight together for integration and equity in the regions where they live.

Elsewhere I have defined "cultural dexterity" as the quality of being able to enter very diverse settings and feel comfortable, even when outnumbered by people of a different race or ethnicity. It requires effort, a willingness to work at learning about and being immersed in someone else's culture. And for those who undertake the effort, the process of honing cultural dexterity is never-ending. Rising interracial intimacy, immigration, demographic change, generational replacement, and increasing geographic diversity—all of these forces will have a powerful *cumulative* impact on our future. Because of these forces, the ranks of those who live with diversity and are forced to acquire dexterity will continue to expand, perhaps exponentially, in coming decades.³³

The cultural dominance of integrators will be most palpable in dense metropolitan areas, where intense diversity will be inescapable. Emerging global neighborhoods, places where no particular group or culture dominates, will contribute to the rise of the culturally dexterous. An influx of global aspirants changes the complexion of a former white-flight suburb, and many whites decide to stay rather than escape to whiter exurbs. In the 50 largest US metro areas, 44 percent of suburban residents currently live in multiracial, multiethnic suburbs. ³⁴ And younger whites are moving to cities that their parents and grandparents fled decades before. With proximity comes more opportunity for practicing pluralism and creating new norms of inclusion. In these spaces, the culturally dexterous could invest in public institutions that foster inclusive opportunity because they value

^{33.} Cashin (2017), ch. 8.

^{34.} Orfield and Luce (2012).

diverse peoples and must make diversity work. This vision is distinct from mere gentrification borne of population movement and displacement. It is premised on the hope that those who value diversity will intentionally create programs, especially housing policies, and new civic institutions that actively promote robust inclusion of the poor, middle class, and affluent of all colors.

Segregation and supremacy were pursued with aggressive intention for three centuries in this country. Persistent structures and practices of exclusion and non-dexterous mindsets will not be overcome without conscious effort to dismantle and replace them and to instill a new culture of inclusion.

Integration, pursued with care and intention, enables the willing, privileged integrationist to live in a diverse society without fear and enables poor, struggling people to access opportunity rather than be excluded from it. As an affluent citizen who lives within walking distance of subsidized housing and sends my children to a diverse public charter school where a quarter of the children are poor, I can attest to the benefits of such robust inclusion for my family and other families. At our school and in our mixed-income residential environs, people of all races and classes practice dealing with each other, build trust, and advocate together for policies and investments that will improve our schools and neighborhood. Poor black people inhabit both the school and the neighborhood, and no one thinks of them as scary aliens to be avoided.

Some communities already approximate the saner, inclusive spaces of the future. More than 400 counties, cities, or towns require or strongly incentivize new housing development to be mixed-income and 5 to 10 percent of the US population currently lives in these communities. Integrated places typically result from permissive zoning laws that allow more density in residential development, including apartments and town houses, and they exhibit lower levels of racial prejudice. Integrated jurisdictions like Montgomery County, Maryland; West Hartford, Connecticut; and Portland, Oregon also tend to invest more in education and offer more social mobility for poor children. In contrast, segregated communities tend to have highly restrictive zoning that limits density and elevates levels of

^{35.} Ibid.

racial prejudice.36

Increased cultural dexterity may not end the exclusion and marginalization of the black and Latino poor. Accepting a majority-minority nation is one thing, ending plutocracy and ghettoes is quite another. While half of whites may be culturally dexterous by 2040, some unknowable portion will not. Some political liberalization will happen as a result of demographic changes and rising dexterity. However, concerted effort to mobilize multiracial constituencies will be necessary. No jurisdiction will enact an inclusionary zoning ordinance, welcome public transportation from less advantaged places, or invest more in a disadvantaged side of town, without a loud insistent chorus of voices. An organized coalition, like chapters of the Industrial Areas Foundation, is needed to demand such policies of government!

As more of us acquire dexterity and habits of inclusion, it will become much easier to create winning coalitions and communities of civility, where a debate about school funding is more a spirited exchange about what actually works than a zero-sum fight. Many communities of decency do exist today. They support inclusionary zoning laws that allow struggling people to live near great schools and employers that might hire them. Imagining the third Reconstruction in dexterous places of the future brings a smile to my face.

Research by Robert Putnam suggests that non-dexterous people burrow in and avoid civic engagement when they enter diverse settings. They acquired comfort with out-groups. Such communities will multiply as the culturally dexterous multiply. There are places today that declare they are welcoming to immigrants because they want to bring vitality to their struggling communities. They work at helping new residents and existing ones get to know and understand each other. They are building new human bridges and yes, sometimes are whipsawed by the tensions.

^{36.} Orfield and Luce (2012); Chetty et al. (2013); Massey and Rugh (2014).

^{37.} Putnam (2007).

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