

ENVIRONMENTAL DETERMINISM: FUNCTIONAL EGALITARIAN SPACES PROMOTE FUNCTIONAL EGALITARIAN PRACTICES

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Egalitarian, place-based thinking belongs at the table when considering approaches to improving early childhood. Places connect people's lives. They also generate patterns that organize, and can re-organize, our social order and behavior.¹ Places can spark and support the development of self-governance and cultivate a political voice grounded in the needs of the same community that place generates. Whether considered as community schools, community centers, or more ambitiously, community housing developments designed to include services that meet the needs of residents, the spatial dimensions of early childhood policy require explicit consideration.

I. AN AMERICAN HISTORY OF INTENTIONAL, PROGRESSIVE, PLACE- BASED SOCIAL DESIGN

The 19th century saw communities in the United States developed intentionally around social conceptions often labelled Utopian (and critiqued for their various failures to realize their ideals). From the British socialist Robert Owen's New Harmony in Indiana to the religiously-driven "free love" Oneida Community of theorist John Humphrey Noyes,² these communities envisioned re-organized social orders implemented in part through re-designed spaces inspired by the French philosopher Charles Fourier. These highly-intentional communities, premised on placing the common good above the individual, included perfecting a socialist ideal of collective governance and equal sharing of the tasks necessary to sustaining all of the members of the group. This vision included more egalitarian conceptions of women's position in decision-making and in domestic labor. The architecture of the Oneida community allowed for collective kitchens and nurseries that both created economies of scale and modeled the idea that care and cooking are community rather than maternal responsibilities. Fourier, who is credited

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1. See generally Katharine B. Silbaugh, *Distinguishing Households from Families*, 43 *FORDHAM URB. L.J.* 1071 (2016) [hereinafter *Distinguishing Households*] (explaining throughout how the fluidity in household compositions shapes familial behavior).

2. For this discussion of the Oneida Community, see generally Lawrence Foster, *Women, Family, and Utopia: The Oneida Community Experience and Its Implications for the Present*, 28 *SYRACUSE UNIV. LIBR. ASSOCS. COURIER* No. 2 45, 51–52, 58 (1993), <https://surface.syr.edu/cgi/viewcontent.cgi?article=1295&context=libassoc> [<https://perma.cc/CVP4-JHGT>].

with coining the term “feminism,” believed that improving women’s status was the most important action item on an agenda of creating a perfected society, and popularized the serious investigation of women’s family work in social theory.³ The will to create these norms was necessarily reflected in the design of the spaces, and architecture was central to Fourier’s path to societal improvement. A driving insight of the socialist utopian communities was that a traditional domestic sphere is a social product, and susceptible to re-arrangement. Their influence on the thinking of the era is reflected in Elizabeth Cady Stanton’s reference to Fourier’s community life and co-operative households at the Women’s Rights Convention at Seneca Falls in 1848.⁴

The architectural historian Dolores Hayden describes a later example of an American housing development that explicitly considered the needs of working women with children.⁵ During WWII, industries producing specifically for the war scaled up quickly as demand skyrocketed. With so many predominantly male young people serving overseas, what may have been the war industry’s preferred workers were in short supply. The Kaiser Shipping Company, which would eventually build a substantial portion of the ships to meet the increasing demand, maintained shipyards in Richmond California (the home of Rosie the Riveter),⁶ and along the Columbia River in both Washington State and Oregon. Kaiser was innovative, developing methods of shipbuilding that were faster than other producers, and recruiting a diverse workforce composed of African Americans, Asian Americans, Latino Americans, and white women from across the country. Along the Columbia River, to prepare for their relocation to Oregon, a city arose almost overnight in 1942 to house the 40,000 people associated with the Kaiser Shipyards. Sometimes called Kaiserville, or Vanport (Vancouver and Portland combined), the housing development was modestly more integrated than prior housing in the Portland area, though neighborhoods were de facto identifiable by race.

3. *See generally* CHARLES FOURIER, THE UTOPIAN VISION OF CHARLES FOURIER: SELECTED TEXTS ON WORK, LOVE, AND PASSIONATE ATTRACTION (Jonathan Beecher & Richard Bienvendu eds., trans., 1971); FRANK MANUEL, *Charles Fourier: The Burgeoning of Instinct, in THE PROPHETS OF PARIS 195–248* (1962) (surveying Fourier’s Utopian Socialist theories); NICHOLAS V. RIASANOVSKY, THE TEACHING OF CHARLES FOURIER (1969) (examining the life, thought, and philosophy of Charles Fourier).

4. ELIZABETH CADY STANTON, ELIZABETH CADY STANTON AS REVEALED IN HER LETTERS, DIARY AND REMINISCENCES 144 (Harriot Stanton Blatch & Theodore Stanton eds., 1932), https://archive.org/stream/elizabethcadysta01stan/elizabethcadysta01stan_djvu.txt [<https://perma.cc/VN3T-Z99A>].

5. For discussion of Vanport, *see* DOLORES HAYDEN, REDESIGNING THE AMERICAN DREAM: GENDER, HOUSING, AND FAMILY LIFE 19–32 (1984).

6. *Rosie the Riveter WWII Home Front*, NAT. PARK SERV., <https://www.nps.gov/rori/learn/historyculture/places.htm> (last visited Aug. 19, 2018) [<https://perma.cc/JSU4-RBKX>].

Kaiser broke even on the cost of the housing development, but earned a substantial profit from the shipyard itself. In other words, the housing was designed to serve the purposes of the business, which necessitated meeting the needs of the workers. In contrast to the Utopian community at Oneida, designed by its occupants according to a shared social vision, Vanport was designed to meet the needs of the employer by meeting the needs of the workers. Yet in both cases, spatial focus included collectivizing the care of children and other household functions such as meal preparation. With so many women working in the shipyard, the architect recognized that the development needed to ease their family responsibilities to make it possible for them to work one of the three shifts that characterized around the clock production. The architect insisted that the housing be placed on a straight line to the shipyard with the six childcare centers, which were “open twenty-four hours a day, seven days a week (just like the shipyards), complete with infirmaries for sick children, child-sized bathtubs so that mothers do not need to bathe children at home, cooked food services so that mothers can pick up hot casseroles along with their children, and, most important of all, large windows with views of the river, so that children can watch the launchings at the yards. ‘There goes mommy’s ship!’ said one excited five-year-old.”⁷ Though it was not a democratically-produced community, the need to build the entire city in 110 days created a circumstance where needs could be considered in an integrated fashion and designed into place.⁸

This is not to suggest that Vanport was a Utopia. In fact, when the war ended, this innovation hub no longer served the needs of the shipyard, and was allowed to deteriorate. A meaningful portion of the population that remained in the city post-WWII was African American, and neglect of the community’s needs by the state of Oregon set in; indeed, the State contemplated dismantling the entire development, which would have effectively driven out its remaining 20,000 residents. As recently as 1926, Oregon had made it illegal for black citizens to move into the State, and that explicit racism informed the post war thinking about Vanport. Vanport had been built on marshland along the Columbia River, and was dependent upon dikes to keep the village dry. In May 1948, after unusually heavy rainfall, flood waters had risen dramatically. Nonetheless, the people of Vanport were given repeated notifications by the State that the dikes would hold, right up through the morning of May 30, the day that the dikes broke. Within 10 minutes, Vanport was entirely flooded, leaving 18,500 people homeless and destroying Oregon’s

7. HAYDEN, *supra* note 5, at 20–21.

8. Natasha Geiling, *How Oregon’s Second Largest City Vanished in a Day*, SMITHSONIAN (Feb. 18, 2015), <https://www.smithsonianmag.com/history/vanport-oregon-how-countrys-largest-housing-project-vanished-day-180954040/> [<https://perma.cc/H86P-MG2X>].

second largest city instantly.⁹ Questions about racism in flood preparation and warnings continue, and so the story of Vanport is a decidedly problematic piece of Oregon history. Perhaps for that reason, the social design that it had achieved only a few years earlier became obscured until Dolores Hayden excavated this important narrative in the history of Kaiserville.

In addition to Utopian religious communities led by charismatic men, such as the Oneida community, and the functionally-designed worker village in Vanport, women themselves theorized and enacted place-based social projects that have been lost to public memory, but could serve as a role model for thinking about early childhood care today. In *THE GRAND DOMESTIC REVOLUTION: A HISTORY OF FEMINIST DESIGNS FOR AMERICAN HOMES, NEIGHBORHOODS, AND CITIES*,¹⁰ Hayden pulls together multiple living ideas organized by and for women between the Civil War period and the Great Depression. Hayden labels these reformers “material feminists” because they connected spatial design with the achievement of increased freedom for women. These reform movements and thinkers all agreed that the isolation of the single family home should be the target of reform, as it increased women’s unpaid labor burdens and denied them access to the economies of scale in cooking, laundry, and the care of children that were being chased in other forms of production in the emerging industrial world. She credits material feminists with “two insights into women’s oppression, a spatial critique of the home as an isolated domestic workplace and an economic critique of unpaid household work.”

Charlotte Perkins Gilman and Melusina Fay Peirce theorized what was called the Cooperative Housekeeping Movement.¹¹ Gilman and Peirce envisioned women taking control of domestic production, particularly cooking, laundry, and childcare, either by developing the efficiencies of collectivizing the work, or by developing those efficiencies and then monetizing their production, selling the work to husbands and to third parties.¹² Gilman developed and promoted architectural designs for apartment hotels with kitchen-less residential spaces, but with substantial collective kitchens, childcare, and laundries

9. *Id.*

10. DOLORES HAYDEN, *THE GRAND DOMESTIC REVOLUTION: A HISTORY OF FEMINIST DESIGNS FOR AMERICAN HOMES, NEIGHBORHOODS, AND CITIES* (MIT Press 1982).

11. *See generally* MELUSINA FAY PEIRCE, *CO-OPERATIVE HOUSEKEEPING: HOW NOT TO DO IT AND HOW TO DO IT* (1884); CHARLOTTE PERKINS GILMAN, *THE HOME, ITS WORK AND INFLUENCE* (Univ. of Ill. Press 1972) (1903) (both works exemplifying the authors’ theories of the Cooperative Housekeeping Movement).

12. HAYDEN, *supra* note 10, at 78–80.

at larger scale within the same building.¹³ Her ideas reached the Ladies Home Journal, which in 1919 declared that “[t]he private kitchen must go the way of the spinning wheel of which it is the contemporary.”¹⁴ In other words, mainstream social discourse of the day allowed for these transformational ideas in the evaluation of home life.

II. CARE WORK: THE *PLACE* OF DOMESTIC LABOR TODAY

Any effort to characterize domestic labor today runs quickly into simplification in a pluralistic society. That said, some attention to the role of place from a variety of perspectives helps us to understand the significance of place-based design thinking in crafting policy. Some women perform domestic labor for wages in settings such as private households, hotels, childcare centers, fast food restaurants, and commercial laundries, for example. Their wages and work conditions are wrapped up both in the gender of domesticity¹⁵ and in domestic relationships arising out of slavery, Reconstruction, and the migration of African Americans to northern cities, and continue in today’s migration conditions over the southern border to the United States.¹⁶ Even for those who work at these domestic tasks, there is a place-based distinction, with significantly greater wage, labor, and safety protection extended to those who work in collectivized settings (which we call “commercial”), versus those who do this work for wages in private households, replicating and enabling a gendered conception of domesticity ordinarily built on racial stratification.¹⁷ Place matters to conceptualizing early childhood care and services, and reformers need to theorize it in order to make effective policy.

13. CHARLOTTE PERKINS GILMAN, *WOMEN AND ECONOMICS: A STUDY OF THE ECONOMIC RELATION BETWEEN MEN AND WOMEN AS A FACTOR IN SOCIAL EVOLUTION* 75 (Harper Torchbooks 1966) (1898).

14. Jane Holtz Kay, *DESIGN NOTEBOOK: The Once and Future Kitchenless House*, N.Y. TIMES (Feb. 23, 1989), <https://www.nytimes.com/1989/02/23/garden/design-notebook-the-once-and-future-kitchenless-house.html> [<https://perma.cc/2PAV-7ZR2>].

15. See Katharine B. Silbaugh, *Turning Labor into Love: Housework and the Law*, 91 NW. U. L. REV. 1, 23–24 (1996) [hereinafter *Turning Labor*]; Katharine B. Silbaugh, *Commodification and Women's Household Labor*, 9 YALE J.L. & FEMINISM 81, 95 (1997) [hereinafter *Commodification*].

16. PREMILLA NADASEN, *HOUSEHOLD WORKERS UNITE: THE UNTOLD STORY OF THE AFRICAN AMERICAN WOMEN WHO BUILT A MOVEMENT* (2016); PHYLLIS PALMER, *DOMESTICITY AND DIRT: HOUSEWIVES AND DOMESTIC SERVANTS IN THE UNITED STATES, 1920–1945* (1990); see generally Kyle Boyd, *The Color of Help*, CTR. FOR AM. PROGRESS (Jun. 17, 2011), <https://www.americanprogress.org/issues/race/news/2011/06/17/9783/the-color-of-help/> [<https://perma.cc/84EA-8WW5>].

17. See *Turning Labor*, *supra* note 15, at 73; *Commodification*, *supra* note 15, at 112; see generally David Callahan, *Obama Just Changed the Most Racist Law in the Country*, THE AM. PROSPECT (Sept. 18, 2013), <http://prospect.org/article/obama-just-changed-most-racist-law-country> [<https://perma.cc/2UM4-EEZ6>].

When considering domestic labor for the majority of families, who do not perform this work for wages but care for their own children and work elsewhere in the paid labor market, the role of place may be obscure as a matter of politics and policy. Yet place is a palpable challenge of daily life for most people. Since WWII, the middle class has migrated to suburban communities, largely segregated by race as a result of FHA redlining practices,¹⁸ and aided by white families moving out of cities in order to avoid having their children attend racially integrated schools (a movement referred to as white flight that persists in different forms today).¹⁹ This vast separation of housing from work sites produces a host of social issues that greatly exacerbate the challenges of raising children while working in the paid labor force. This issue is as significant for children living in middle class sprawled suburbs whose parents commute distances either to the city or among suburban communities as it is for low-income children living in urban neighborhoods whose parents commute long distances to service jobs that sustain the middle class who are living at a remove from the city.²⁰ By cultivating single-use zoning that separates residential zones from commercial zones, the ideological separation of families from markets is built into the environment.²¹ Segregating residences by race and economic class prevents the effective integration of work and family for people with a variety of roles in the social economy of childcare, and separating zones of commercial uses from residential uses ensures that few people can live close to their workplace.

The separation of residences from workplaces makes children inaccessible to their parents during the day, and parents' participation in the care and decision-making for their children more challenging. It promotes car ownership, which is expensive. Indeed, transportation is the second greatest expense, after housing, in the budget of American families,²² with the average person spending \$2,600 yearly on

18. CHARLES M. LAMB, HOUSING SEGREGATION IN URBAN AMERICA SINCE 1960: PRESIDENTIAL AND JUDICIAL POLITICS 2, 22 (2005); Michael H. Schill & Susan M. Wachter, *The Spatial Bias of Federal Housing Law and Policy: Concentrated Poverty in Urban America*, 143 U. PA. L. REV. 1285, 1310–11 (1995).

19. XAVIER DE SOUSA BRIGGS, *More Pluribus, Less Unum? The Changing Geography of Race and Opportunity*, in THE GEOGRAPHY OF OPPORTUNITY: RACE AND HOUSING CHOICE IN METROPOLITAN AMERICA 17, 23–27 (Xavier de Sousa Briggs ed., 2005).

20. Keith Ihlanfeldt, *The Spatial Mismatch Between Jobs and Residential Locations Within Urban Areas*, 1 CITYSCAPE 219, 228 (1994).

21. Katharine B. Silbaugh, *Women's Place: Urban Planning, Housing Design, and Work-Family Balance*, 76 FORDHAM L. REV. 1797, 1821 (2007) [hereinafter *Women's Place*].

22. Amelia Josephson, *The Average Cost of an American Commute*, SMARTASSET (July 5, 2018), <https://smartasset.com/personal-finance/the-average-cost-of-an-american-commute> [https://perma.cc/26QX-7REP]; Barbara McCann, *Driven to Spend: The Impact of Sprawl on Household Transportation Expenses* (2000), <http://transact.org/wp-content/uploads/2014/04/DriventoSpend.pdf> [https://perma.cc/LRU4-JGGZ].

commuting,²³ and spending almost a half hour in each direction on the trip.²⁴ Sadly, the time and expense of commuting are both currently *on the rise*.²⁵ Between 2000 and 2012, the decline in the proximity of jobs to residences was particularly acute for low-income communities of color.²⁶ The distance between home and work is increasing, complicating the lives of young children and their caregivers who cannot access their children for emergencies or routine care, or participate in decision-making with social service agencies, caregivers, teachers, or medical professionals. Seen through the eyes of the Utopian reformers of the late 19th and early 20th centuries, today's landscape must appear to be an architectural dystopia of separate spheres, domestic inefficiency, and both social and economic inequality.

III. SOLUTIONS?

What would it mean to take place into account when developing policy approaches to early childhood education? In addition to raising overall awareness of the spatial challenges that interfere with access to available services, and keeping those challenges at the forefront of thinking about policy, we also see strands in current policy thinking that might serve as models of higher quality place-based thinking. One example is the Community Schools Movement.

A. *Community Schools Movement as a Contemporary Place-Based Reform*

Some robust experiments are taking place in the United States under the heading of Community Schools.²⁷ These schools recognize that children's readiness to learn is influenced by parental economic instability, housing instability, food insecurity, unreliable childcare

23. Kathryn Vasel, *We Spend \$2,600 A Year Commuting to Work*, CNN MONEY (June 17, 2015), <https://money.cnn.com/2015/06/17/pf/work-commute-time-and-money/index.html> [<https://perma.cc/X792-EYEF>].

24. Christopher Ingraham, *The American Commute Is Worse Today Than It's Ever Been*, WASH. POST (Feb. 22, 2017), https://www.washingtonpost.com/news/wonk/wp/2017/02/22/the-american-commute-is-worse-today-than-its-ever-been/?noredirect=on&utm_term=.0f9194760239 [<https://perma.cc/HE4H-JAMY>]; Map of Average Commute Times in the United States, WNYC, <https://project.wnyc.org/commute-times-us/embed.html> [<https://perma.cc/V4M5-ZQJZ>].

25. Ingraham, *supra* note 24.

26. Elizabeth Kneebone & Natalie Holmes, *The Growing Distance Between People and Jobs in Metropolitan America*, BROOKINGS INST. 1 (Mar. 2015), https://www.brookings.edu/wp-content/uploads/2016/07/Srvy_JobsProximity.pdf [<https://perma.cc/T6AL-322R>].

27. See generally Martin J. Blank et al., *Achieving Results Through Community School Partnerships: How District and Community Leaders Are Building Effective, Sustainable Relationships*, CTR. FOR AM. PROGRESS (Jan. 2012), <https://files.eric.ed.gov/fulltext/ED535652.pdf> [<https://perma.cc/CA95-NH6V>].

arrangements, and lack of access to health care.²⁸ Because school buildings play a central role in the lives of families, the community school concept uses the school building as an entry point for accessing an array of services beyond what we typically think of as education. Having a single site where families can access a variety of social and government services including SNAP, unemployment benefits, childcare, healthcare, counseling, adult literacy, workforce training, addiction treatment, and housing assistance, permits service providers to integrate services, and families to receive integrated services.

The coordination of service providers in a place-based system such as a Community School is a challenge, but it is no more challenging than what society asks parents to navigate each day as they attempt to access services that are currently spread across multiple sites. In other words, the difficulty that providers may experience coordinating toward a single place-based solution should be met with at least as much wherewithal as we expect of individuals in need of those services, who currently must navigate multiple systems in scattered locations.

There are examples of Community School concepts that show promise. The State of Kentucky, for example, has required that every elementary school where greater than 20% of the student body is eligible for free or reduced cost lunch must have an active Family Resources and Youth Service Center.²⁹ These centers have been required for the past 25 years in Kentucky, but the enacting legislation explicitly allows for local flexibility as to services offered, and community ownership.³⁰ These attributes are essential to the self-governance conception of place-based programming that develops political and community voice and consciousness around determining service needs. “Whatever it takes” is the motto of the nonprofit partners who support the implementation of the legislation, and examples of the range of services at Kentucky’s school-based family centers is truly remarkable: dropout prevention, dental health, physical activity, educational support, kindergarten readiness, career readiness, substance abuse counseling, parenting classes, grief counseling, safety, dental health, ESL support, community development, homelessness support, summer camps, support groups, crisis intervention, transitioning, fatherhood initiatives, kinship support, academic enrichment, child care referrals, hygiene, mental health, vision

28. *Id.* at 1.

29. KENTUCKY FAMILY RESOURCE AND YOUTH SERVICES CENTERS: 2016 STATUS REPORT 19, <https://chfs.ky.gov/agencies/dfrcvs/dfrysc/Documents/FRYSCStatusReportFeb92017.pdf> [<https://perma.cc/NMF6-3LRM>]; *see generally* KENTUCKY CABINET FOR HEALTH AND FAMILY SERVICES: DIVISION OF FAMILY RESOURCE AND YOUTH SERVICES CENTERS, <https://chfs.ky.gov/agencies/dfrcvs/dfrysc/Pages/default.aspx> [<https://perma.cc/5PAB-VEUJ>].

30. KENTUCKY FAMILY RESOURCE AND YOUTH SERVICES CENTERS: 2016 STATUS REPORT 14, <https://chfs.ky.gov/agencies/dfrcvs/dfrysc/Documents/FRYSCStatusReportFeb92017.pdf> [<https://perma.cc/NMF6-3LRM>].

health, and advocacy is a partial list of the services provided by Family Resources and Youth Services Centers within many Kentucky schools. This is a perfect example of a place-based reform, one that could be built out to serve as the central location for community meaning and personal development, as well as essential childcare and economic opportunities for every person struggling with the transition to parenting or for every child whose parents could benefit from integrated access to services at a single site. Full-service community schools are described as the “gold standard” of school-linked services, and research supports the effectiveness of such projects.³¹ As complicated as it may be to coordinate actors from nonprofits and multiple government agencies, the benefits justify the effort.

The power of the public school as a site for services is well-understood by providers, many of whom seek to link their services to schools (sometimes called School-Linked Services, or SLSs). Well-conceived Community Schools, however, can provide more than convenience and service integration: they can generate political power by serving as community organizations in which young parents are able to articulate their needs collectively and develop a localized political agency that could move debates outside of their own community school.³² Indeed, it is the development of political consciousness around the challenges of early childhood services that characterized the utopian communities of the 19th century and the material feminists, and produced a burst of creative energy fueled by a changed understanding of the roles of each individual in social reproduction and re-conceived public and private functions.

B. *Adding Housing Policy to Community Schools*

Finally, consideration of effective planning for early childhood needs to include housing policy reform. Even when an idealized full-service community school can provide everything a family may need, if a parent does not live near the school and her workplace is not near the school, transportation and travel time will serve as enormous barriers to her effective participation in services. We need to reconsider where we put affordable housing, so it is better integrated into thriving economic areas that can generate a variety of effective services. In addition, we need to reconsider our single-use zoning that separates housing from workplaces, and make a conscious effort to up-zone residential neighborhoods for

31. For a thorough discussion of the ideas behind, justification for, impediments to, and outcomes from Community Schools, *see generally*, LAURA R. BRONSTEIN & SUSAN E. MASON, *SCHOOL-LINKED SERVICES: PROMOTING EQUITY FOR CHILDREN FAMILIES, AND COMMUNITIES* (2016).

32. Pauline Lipman, *THE NEW POLITICAL ECONOMY OF URBAN EDUCATION: NEOLIBERALISM, RACE, AND THE RIGHT TO THE CITY* 63–64 (2011).

greater density, especially when they are near public transportation. We need to re-zone both residential areas and commercial areas so that they each promote and facilitate mixed-use development, where housing and commerce can co-exist so that jobs and families are integrated in one space with schools. We need to conceptualize housing that keeps non-household family members, particularly fathers, in a proximity that facilitates their continued engagement in parenting and sharing of the burdens of early childhood, and that allows for individuals to age in proximity to their adult children or support networks.³³ Mixed-use, mixed income community housing developments, sited near commercial districts that provide job opportunities and market services, with on-site community schools and a range of housing unit sizes fit to house single individuals, the elderly, and parents of young children together should be an essential aspiration for a progressive and healthy vision for young children.³⁴

Without addressing some of the disastrous housing policy that characterized the 20th century, policy that promoted social division and hampered women in their efforts to collectivize domesticity, interventions into early childhood education and care will face an even steeper uphill battle. Promoting density and a diversity of uses is a part of a public process of improving the lives of struggling families, which in turn improves their ability to attain their own vision for parenting their young children.³⁵

33. *Distinguishing Households*, *supra* note 1, at 1090–1104.

34. *Id.*

35. *See generally id.*; *Women's Place*, *supra* note 21.