Comments of Michael McKinsey Brenda Barnes and Peter Naughton, Homeowners and Interested Parties,¹ on REIR re: Proposed Development at 2930 Colorado Avenue, Santa Monica 90404, SCH#2010061036 :

The REIR misrepresents the project.

The Recirculated Environmental Impact Report ("REIR") is based on a project which consists of the development of a mixture of retail, office and residential uses. The residential uses would include a combination of apartments, condominiums and mobile homes. It is an entirely new configuration of land uses representing a radical departure from all previous proposals for development of the site linking as it does such a variety of residential types with a core of retail commercial and office uses.

The REIR being based on this Revised Project is fundamentally flawed in claiming that the revised project represents only a reduction of the new residential and commercial development that was previously proposed. It misrepresents what that reduction is, and makes no effort to integrate an assessment of the impact of the newly introduced mobile home residential element into the project.

The proposal does result in a small reduction in floor space overall on the site compared with the one considered by the FEIR, because the area being devoted to conventional construction, as opposed to RMH use, has been reduced. That reduction occurs because an area is now being "reserved" <u>and developed</u> for that RMH assignation. This results in a completely new land use intensity on both the RMH and non RMH areas than that which was discussed in the FEIR. (FEIR p.53: REIR p.43)

Therefore the REIR mis characterizes the new land use proposal solely as a reduction of the previous one. The new proposal in reality represents an entirely new departure. In fact it is a unique representation of how a varied mix of residential, retail, office and recreational uses may be blended. To say that it is simply a reduction in size is to avoid the issue that there has rarely been a mix of residential types like those being proposed on this site anywhere. Any assumptions regarding traffic, utility use , noise, air quality, have therefore to be specified and proved afresh. To say that the only difference between this proposal and the previous development is that it represents a reduction is disingenuous. The overall project is reduced by less than 12% without taking into consideration that area of the site being proposed for RMH use.

An accurate, stable and finite description of a project is basic to an informative and legally sufficient EIR. As this is still not available to the public, the analyses provided for all categories of the subject

1The State Mobilehome Residency Law ("MRL"), Civil Code §§ 798 et seq. Uses "homeowner" as the terminology for a person entitled to reside in a mobilehome park. In Santa Monica, under Santa Monica Rent Control, City Charter § 2001, homeowners are covered as to the space they rent to put their mobilehomes on, on a permanent foundation, and live permanently in them, as "tenants," just as are all other persons entitled to rent housing units in Santa Monica. For consistency throughout these Comments, unless referring specifically to housing services and rents due to them as tenants of the spaces of ground or real estate rented by homeowners under Santa Monica Rent Control, the persons commenting will be referred to as "homeowners," as under the MRL. Each of the three of us is commenting jointly with the other two, but for him or her self alone, not representing each other.

matter of this current document -SCH# 2010061036/REIR are inadequate. Therefore a legally sufficient EIR has still not been provided for this project.

Basic to environmental review is that it occur early enough in the planning stages of a project to enable environmental concerns be related to the project's program and design, yet late enough to provide meaningful information for environmental assessment. (CEQA Guidelines, § 15004, subd. (b).). This has obviously not occurred because of the fact that future development is so unspecified and so uncertain, that no purpose can be served by requiring the public to engage in the sheer speculation as to future environmental consequences of development at the site as this REIR does. (REIR p 39)

The REIR not only misrepresents what the object of its analysis is but assumes that its flawed overview is sufficient to justify several pages of unsubstantiated assertions that there is no need to provide any information to enable the public to meaningfully discuss the new proposal at all!

The REIR blandly justifies not discussing Aesthetics, Air Quality, Biological Resources, Neighborhood Effects: Cultural Resources: :Hazards and Hazardous Materials, Land Use, Population and Housing, Public Services:, Traffic, Utilities aspects of the project by using a ratio test i.e. the revised project, because it differs as described previously from the FEIR proposed projects, adds an insignificant amount of impact compared to what impact was already there as per the FEIR, and so said impact is not significant.

By using a Ratio Test the REIR fails to proceed as required by law

By using a Ratio Test as described above the REIR fails to proceed as required by law on the issues subjected to the test because it has not adequately informed the public so it can comment upon what analysis if any were done on the environmental impacts of the project which is the subject of the REIR.

For example, the REIR is based on the assumption that because the proposal now includes a portion of RMH with its mixed use retail, residential and office uses it has less of an environmental impact than before. For example on p 137 it states "The Revised Project represents a reduction of new residential and commercial development than previously proposed. In addition, the Revised Project would retain the portion of the existing Village Trailer Park on Parcel No. 4268-002-009. "As such", the REIR continues, "the overall amount of demolition, grading, and construction activities would be less than the previously proposed project and the project's solid waste generation during construction may be slightly reduced. Therefore, impacts would be less than significant as analyzed in the Draft EIR."

This is an effort to deliberately obscure a crucial fact that construction activity scheduled for the site show an almost 100% increase in excavation and grading to complete the project.

The current regulatory framework outlined in the REIR does not explain what standards and policies for future development exist. Standards are not discernible from the LUCE discussion of the land use and circulation elements it embodies. As it purports to be the basis for a regulatory framework and as it does not set forth the required elements of a General Plan in an understandable manner it cannot be deemed to be in substantial compliance with Government Code section 65301. Although the missing information critical to an adequate discussion of statutory criteria is ostensibly being supplied through documents outside the general plan, a clear reference to the outside documents has not been presented in the REIR. Accordingly analyses dealing with traffic, environmental justice, Aesthetics, Air Quality, Biological Resources:, Cultural Resources:, Noise, Population and Housing are defective. The

REIR should not be approved until the required planning regulatory framework for land use be logically organized.

The use of the Ratio Test in the REIR is a deliberate attempt to hide data deficiencies crucial to assessing impacts of the proposed development.

It is difficult at best to identify standards essential to a proper evaluation of this proposed development and to identify conditions which should be imposed upon its land uses. The deficiency in the above regulatory framework cannot be saved by (mentioning) reference to a Development Agreement because nothing in that agreement provides the basis for planning the development. The deficient element in the regulatory framework cannot be saved by consideration or references to consideration of documents which are not relied upon in the solution of that deficiency. Use of the ratio test is a deliberate effort to conceal the deficiency in information regarding sewer, water and hydrological capacities relevant to the proposed development.

A sewer study that shows that the City's sewer system can accommodate the entire development has not been prepared and is not available for evaluation. This exemplifies that the planning information being made available in the REIR displays substantial contradictions and inconsistencies and is not logically organized. It generates reasonable doubt concerning the integrity of the regulatory framework being referred to as having the functionality of a General Plan.

A water study that shows that the City's water system can accommodate the entire development for fire flows and all potable needs has not been prepared and is not available for evaluation. This exemplifies that the planning information being made available in the FEIR displays substantial contradictions and inconsistencies and is not logically organized. It generates reasonable doubt concerning the integrity of the regulatory framework being referred to as having the functionality of a General Plan.

A hydrology study of all drainage to and from the site to demonstrate adequacy of the existing storm drain system for the entire development has not been prepared and is not available for evaluation. This exemplifies that the planning information being made available in the FEIR displays substantial contradictions and inconsistencies and is not logically organized. It generates reasonable doubt concerning the integrity of the regulatory framework being referred to as having the functionality of a General Plan.

Regulatory Framework

The REIR proposal is so conclusory that meaningful public review and comment are precluded..

(1) The REIR implies that the VTP project will have less significant environmental impact because it now complies with the general plan or its surrogate planning documents-LUCE and a Development Agreement. Compliance with the LUCE and CEQA are independent requirements. The mere fact that a project is consistent with an adopted general plan surrogate does not mean that its environmental effects cannot be significant.

(2) The REIR fails to present any evidence that the retention of a larger area of the existing Village Trailer Park than the area presently proposed for retention for RMH use would harm the existing

character of the neighborhood.

(3) In fact no justification of any kind has been presented for locating "up to " ten mobile home spaces".on the portion of the site designated in the development proposal for this use.

(4) The REIR proposal to do this is so conclusory that meaningful public review and comment are precluded...It violates the very spirit of the CEQA Guidelines on recirculation because the proposal is not limited to certain portions of the document as CEQA Guidelines §15088.5 states it must be. The proposal is an entirely new concept in designing a mixed use project because it combines trailers with conventional construction in a setting of mixed creative uses. No discussion of the stability of the homes involved was presented nor were any arguments presented regarding the siting of the "mobile homes' so far away from the existing community room and library. In doing so, the REIR fails to comply with the LUCE policy regarding the future of Village Trailer Park (LUCE p 310. D24.13)

(5) That the REIR does not discuss the impacts of designating one portion of the site for conventional construction and another for any other type of construction without proper presentation of the criteria by which the size of each designation was arrived at is unconscionable. The predomination of the portion to be be used for conventional construction is a planning and community development issue that requires discussion, considering the implications of "ghettoizing" one of the uses. Restricted connections between occupants of the development based on the type of housing they occupy by deliberate segregation is contrary to the policy of the General Plan.

(6) The power of place to predict compromised developmental outcomes is strong. This proposal embodies an effort to concentrate existing residents into an area that socially and geographically reinforces their isolation from resources important to to the maintenance of their identity and ensures their exposure to risks that compromise their mental and emotional health. (See attached Exhibit A-"The Danger of Ghettos")

(7) The current regulatory framework outlined in the FEIR does not explain what standards and policies for future development exist. Standards are not discernible from the LUCE discussion of the land use and circulation elements it embodies. As it purports to be the basis for a regulatory framework and as it does not set forth the required elements of a General Plan in an understandable manner it cannot be deemed to be in substantial compliance with Government Code section 65301. Although the missing information critical to an adequate discussion of statutory criteria is ostensibly being supplied through documents outside the general plan, a clear reference to the outside documents has not been presented in the REIR. Accordingly responses dealing with Traffic, Environmental Justice, Aesthetics, Air Quality, Biological Resources:, Cultural Resources:, Noise, Population and Housing are defective. The REIR should not be approved until the required planning regulatory framework for land use be logically organized.

Until then it is difficult at best to identify standards essential to a proper evaluation of this proposed development and to identify conditions which should be imposed upon its land uses. The deficiency in the above regulatory framework cannot be saved by (mentioning) reference to a Development Agreement because nothing in that agreement provides the basis for planning the development. The deficient element in the regulatory framework cannot be saved by consideration or references to consideration of documents which are not relied upon in the solution of that deficiency.

The REIR does not present any evidence that this proposal represents the extent that it is feasible to retain Village Trailer Park consistent with the regulatory framework

This proposal destroys the social fabric of the existing site. It enhances stigmatization of one part of the site which currently represents a cohesive fully functional unit. Social stigmatization, as opposed to social integration is potentially liable to emerge as a daily reality for all residents of the site No discussion of this impact is presented in the Recirculated. EIR. The proposed land use plan on the site creates residential patterns that cluster current residents into an arbitrarily defined area of the site in a manner that would ensure it will become a pocket of land use differentiated from any other. It will thus ensure separation and segregation rather than community and neighborhood.. This spatial configuration defines the type of residential experience residents will have. (see Exhibit A) Spatial characteristics of community contribute to the patterns of engagement and there is no effort to discuss this aspect of the proposal to justify how it deviates from the principle of the LUCE (LUCE p 323) Social marking based on place of residence will be an occurence on the site.

Allowing for the free siting of mobile homes on and around the development proves another option that better recognizes the investment existing residents of Village Trailer Park have made.

Traffic:

The REIR fails to present updated data regarding the traffic implications of the new proposal. There has rarely been a mix of residential types like those being proposed on this site anywhere. Any assumptions regarding traffic, utility use , noise, air quality, have to be specified and proved afresh. Traffic data used in the REIR is out of date. It is therefore unreliable as to the assessment of the impact of the proposed project on current traffic conditions.

Traffic counts we have done in the current year show that the traffic data presented in the Draft EIR (and by reference the instant REIR) intersection operation analysis does not accurately reflect the traffic impacts of the proposed development. The data used throughout the Traffic Study for the project was collected in 2007 for the majority of the intersections included as being within the traffic zone of influence of the proposed project. (Draft EIR p.252) The Santa Monica City TRAFFIX data base is based on traffic counts done in 2007. No new traffic counts were undertaken as the basis for any of the trip generation modeling done for this radically different land use configuration on the site.

Although the Travel Demand Forecasting Model used in the above study purports to be based on a relationship between travel and the built environment, no adjustments of data have been made for the new land use configuration proposed for the site. The disclaimer information on it states it is unreliable in providing information on the behavior of pass by trips, a crucial element in measuring the traffic impact of the proposed project.

THE REIR OMITS ANY DISCUSSION OF WHAT ENVIRONMENTAL INJUSTICES THE PROJECT REPRESENTS AND SO PREVENTS MEANINGFUL PUBLIC PARTICIPATION IN THE EVALUATION PROCESS

Environmental injustice occurs whenever an inequitable distribution of the environmental burdens of pollution and high density development fall on particular demographics or geographic areas. In this instance root causes of such environmental injustices include unresponsive and unaccountable Santa Monica City government policies and regulation, and the lack of resources and political power in the community where Village Trailer Park is located. The decision to rezone Village Trailer is being touted as "compatible with LUCE goals." The way the first two projects to be considered under the LUCE addition to the General Plan have been handled shows LUCE's phraseology of goals and policies was merely a cloak under which a combination of business-focused zoning and secret tax regulatory control targets would meet.

Meeting these undisclosed targets is apparently the dominant consideration in the hybrid "mixed use creative" land use category. Nothing else would explain ignoring at least 11 levels of insanity and illegality in approving this project, discussed above. The LUCE itself as the City Council is interpreting it makes no effort to protect neighborhoods whenever their destruction would yield a greater tax revenue base for the city. This is in spite of the fact that LUCE states a primary goal of "preserving existing neighborhoods," thereby having lulled residents of VTP into thinking, of course, that their neighborhood, the 3.85 acre Park where they lived, which had existed for 60 years at the time, would certainly be preserved. The Council's twisting of these very goals, by deciding in advance to make areas other than this one less commercial, have pushed demand for commercial uses into this one. No evidence is presented in the Draft EIR to show that the destruction of Village Trailer Park was necessary to uphold proper planning of the City of Santa Monica.

EXHIBIT A

WORKING PAPER SERIES

We're Like the Wrong Side of the Tracks: Upscale Suburban Development, Social Inequality, and Rural Mobile Home Park Residence

Katherine A. MacTavish

RPRC Working Paper No. 06-03

February, 2006

Rural Poverty Research Center

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Running Head: Inequality

We're Like the Wrong Side of the Tracks: Upscale Suburban Development, Social Inequality, and Rural Mobile Home Park Residence

We're Like the Wrong Side of the Tracks: Upscale Suburban Development, Social Inequality, and Rural Mobile Home Park Residence

Abstract: Given the emerging social stratification of post-agrarian small-towns, potential effects are apt to be exacerbated for rural poor families such as those residing mobile home parks, a now characteristic rural neighborhood form. While a mobile home park offers affordable access to the American Dream of homeownerships specific factors appear to suggest that social costs are attached to such access. This paper examines the intersection between upscale suburban development and social disadvantage. Drawing on survey and ethnographic field studies findings reveal distinct conditional features of place associated with upscale suburban development that determine the nature of how rural inequality is emerging and what the implications are for working-poor families.

"...in just two decades the village transformed into an affluent community, suburban rather than rural small-town in character, all white, and solidly Republican."

—Salamon on Prairieview (2003)

"When you go into town that's when it's strange. They look down there noses at us there. It's like we're from the wrong side of the tracks." – Resident, Prairieview mobile home park

"Residents there [Prairieview mobile home park] are just never going to pay their way [in taxes] and, because of that, the trailer court is the focus of the entire community's wrath."

-Prairieview Village official

Introduction

That the mobile home park in Prairieview, or any other small town, should be seen as the "wrong side of the tracks" should be of concern, but should come as no surprise. While a mobile home park offers affordable access to the American Dream of homeownership, such access comes with social costs attached (Kiter-Edwards 2004; MacTavish 2001; MacTavish and

Salamon, in press). Historically marginalized to the outskirts of town, the rural mobile home park and its residents have been subject to both overt and covert stigmatization (Miller and Evko 1985; Periera 1995; Wallis 1991). Popular media images of rural mobile-home park life tend to describe trailer parks like: "Paradise Estates, where the shade trees prosper and the trailers rot, where the dogs don't just bark, they bite, where trolling vans from evangelical churches battle a Mister Softee ice-cream truck for the souls of the children" (Dean 1999:134). Such exposés draw the rural trailer park as the equivalent of a rural slum; an image the general public willingly accepts (Baker 1997).

That the mobile home park should be, "the focus of the entire community's wrath," is of concern, particularly in the context of current times. Rural growth over recent decades has produced increasing numbers of post-agrarian rural communities where farming and rural life are no longer equivalent (Castle 1995). As rural communities have been transformed by upscale development driven by urban "growth machines" (Logan and Molitch 1987), the social fabric of these towns has evolved in new ways (c.f. Salamon 2003). Where family reputation, for instance, once formed the basis for placement in a rural social hierarchy (Fitchen 1991), measures of wealth as evidenced by place of residence and conspicuous consumption now prevail (Nelson and Smith 1999; Salamon and Tornatore 1994; Salamon 2003). As suburbanization changes the social structure of small-towns, personal wealth increasingly becomes the measure of individual worth (Fitchen 1981; Salamon 2003). Given the emerging social stratification of post-agrarian small-towns, potential effects are apt to be exacerbated for rural poor families whose, "social connections are restricted and do not integrate them into the new, wider community that has replaced the former rural hamlet-and-hinterland community" (Fitchen 1981:56).

Using grounded theory methodology, we examine processes associated with upscale suburban development in "Prairieview," Illinois asking whether, and if so how, community life has been reshaped in ways that exacerbate the social inequality already experienced by the community's poorer residents—those families who reside in the large mobile home park on the edge of town. Our question has important implications for family wellbeing and child and youth development.

Background

Processes that work to exacerbate inequality are well documented in the urban ghetto where the power of place to predict compromised developmental outcomes is strong (MacLeod 1987; Sampson 2000). By concentrating lower-income families and children into an area that socially and geographically reinforces their isolation from resources important to children's healthy development and ensures their exposure to risks that compromise such development, the community effect of an urban ghetto can be particularly pernicious (Furstenberg et. al. 1999; Wilson 1987). Over time, living isolated in a resource deficient neighborhood, such as the urban ghetto, is theorized to produce a "culture of poverty" or an "urban underclass" within which the intergenerational transmission of poverty is highly intractable (Lewis 1965; Wilson 1987).

Sentimentally and conceptually there is little similarity between the urban ghetto and a rural small town. While ghettos are invariably seen as risky places (Wilson 1987), small-towns are equated with all that is good about an American community life (Hummon 1990). Research provides evidence that agrarian small-towns can function cohesively to support the successful development of children and youth (Elder and Conger 2000; Salamon 2003). High levels of trust and a sense that everyone knows everyone else in these small-towns makes child rearing a community responsibility (Salamon 2003). For families and children embedded in these social

networks, collective resources such as time and attention are concentrated on the socialization of youth (Coleman 1990; Elder and Conger 2000). As a consequence, children and youth with access to supportive community structures and opportunities are more resilient in overcoming serious family traumas than are those with access to fewer such resources (Elder and Conger 2000; Furstenberg et. al. 1999).

Yet for the poor, integration into the social fabric of small towns is a challenge. Without ties to the land, rural poor families are automatically low status and excluded from access to community resources (Duncan 1999; Fitchen 1981). Social stigmatization, as opposed to social integration is a daily reality for rural-poor families (Fitchen 1981). Rural residence patterns that cluster poor families in open-country pockets of rental apartments or trailer parks create rural neighborhoods marked as inferior often termed "the wrong side of the tracks" by the formal community (Fitchen 1991). Poor rural families residing in such places, along with those having "ne're-do-well" reputations deserved or otherwise, struggle daily with social stigmatization (Duncan 1999; Fitchen 1981). High rates of residential mobility, spurred by deficient housing or unstable employment, or a bad family reputation further exacerbate poor families' integration into a rural community (Fitchen 1991; Ziebarth, Prochaska-Cue and Shrewsbury 1997). The social ramifications of being structurally or perceptually "outside" of a rural community intensify the effects of poverty, and essentially narrow the life chances of rural poor children and youth by excluding them from educational and cultural experiences that would otherwise support successful development (Duncan 1999; Fitchen 1995).

With half of the nation's 8.9 million mobile homes sited in mobile home parks and threefourths of these parks in non-metro settings (Manufactured Housing Institute 2002; U.S Census 2003; Meeks 1998), the mobile home park has emerged as a characteristic place of residence for

low-income families and children across the rural U.S. Thus, whether the processes of place that work to define the mobile home park in Prairieview as not only "the wrong side of the tracks" but "the focus of the entire community's wrath" exacerbate the social inequality experienced among working-poor families has implications for the development of not only the children and youth in the Prairieview trailer park, but for the approximately 5 million children nationally who call a trailer parks home. If, as in the urban ghetto, these children are denied access to social resources and opportunities potentially available in a small town based on their place of residence they, like the children in the urban ghetto, are developmentally in danger.

Methods

Design

Because we were interested in social processes, the traditional anthropological methods of participant observation and repeated interviews was most appropriate (Morse, 1998). By revealing micro-level individual, group and community processes often missed by less intensive methods such qualitative approaches can uniquely situate social processes within context (Burton & Jarrett, 2000). Concentrating on one community, "Prairieview," Illinois allowed us to conduct the type of in-depth investigation necessary for a thorough qualitative study. Focusing on a community transformed by a single type of development, in this case upscale suburban development strengthened the potential for highlighting the interplay between development type and contextual effects. Data analysis worked from a grounded theory approach (Strauss & Corbin, 1990). Within such an approach, theory inductively emerges from the data during research and is then refined and extended through a systematic process of constant comparison with new data. With its emphasis on the interplay between social structure and individual agency symbolic interaction serves a useful theoretical framework within which to situate social

processes (Blumer 1969). For this type of study, such strategies offered a distinct advantage by focusing attention on specific processes identified in the literature as important while still allowing for issues and themes to emerge inductively during the course of research (Morse, 1998).

Site Selection

"Prairieview," a small town of just fewer than 5,000 residents in central Illinois was selected as the study community. Prairieview possesses critical dimensions of community social organization identified in the literature as relevant to family well being and child development. The schools, which functioned as the hub of community life, had a solid regional reputation for offering a high quality education. Numerous churches, social and civic organizations, and recreational programs were all thriving in this community. The athletic victories and defeats of high school students were front-page news and school honor rolls were a regular feature in the local newspaper. Thus, Prairieview appeared to represent the type of small towns portrayed in the literature as potentially resourceful for families and developing youth (citation). At the same time, Prairieview presented a study community that had clearly transformed by suburban growth (cf. Salamon, 2003). Finally, earlier research by the second author in Prairieview revealed that the mobile home park and its residents were socially denigrated by newcomer residents to this old town. Thus, the community of Prairieview offered access to an information rich context for examining the potential interplay between suburban development and social inequality.

Data Collection

Data collection began in the fall of 1998 and continued through the summer of 1999. Initial field study worked toward establishing a physical, demographic, and social understanding of the community and mobile home park. Individual key informant interviews with the mayor,

town planner, school administrators, local clergy, mobile home park owner, and youth recreation leader provided a context in which to place what was later learned from mobile home park residents. Participant observations at church activities, community festivals, and local sporting events were made over the course of the study. Local recreation areas, restaurants, and retail establishments were patronized as well. The weekly newspaper was subscribed to and read throughout the study year. Field notes were recorded as soon as possible after each observation, interview, or meeting. In addition to these primary contextual data, census data are drawn on to objectively assess demographic similarities or differences between the community and the park that might be downplayed or magnified by town residents. Combined, these background research methods provide a detailed overview of the study community and mobile home park.

Field study then focused on documenting the day-to-day experiences of residents within the mobile home park. A randomly selected sample of 15% of park households was surveyed (N=85) to capture descriptive data about household demographics, residential experiences, neighborhood and community perceptions, and patterns of social engagement in the park and nearby community. Household's responses were recorded and later coded and entered into a statistical database. Immediately after each typically 45 minute in-home interview, detailed field notes were recorded. Survey and qualitative description thus yielded a detailed image of trailer park life in this community.

A small sample of 16 families with children and youth was followed intensely for a full six months. A series of standard parent and child in-home interviews took approximately 10 hours to complete and gathered family background and developmental histories, information about patterns of interaction in the home, neighborhood, school, and town, and plans for the future. Repeated observations of family members in the home, school, neighborhood, and

community were also conducted to total on average 10 hours per family. Again, detailed field notes were recorded following each encounter. Combined these methods produced rich, thick data as necessary for rigorous qualitative study (Denzin, 1970).

Data Analysis

In keeping with a grounded theory approach, data analysis theory was allowed to emerge from the data (Strauss and Corbin 1998). Field notes were read and reread to inductively identify themes and patterns. Such themes and patterns were then examined through a systematic process of constant comparison wherein each piece of data is compared to every other relevant piece of data. For example, park residents' accounts of economic changes in the community were compared to census data that documented demographic shifts. Likewise, village residents' descriptions of the mobile home park were compared to park residents' descriptions as well as to actual observations in the park. In this way, we strived for verification that is grounded in the data in our analysis. Working through the data in this manner we were able to identify core concepts related to the phenomenon of social inequality in post-agrarian America as well as discern conditional features associated with upscale development that support the production of such an effect.

We first briefly describe the study context of Prairieview and the mobile home park and then present findings related to how social stigmatization is experienced. Finally, we identify the conditional features of upscale development that emerged as most salient to the production of a kind of social inequality that compromised the developmental experiences of park youth. *Site Description*

Until about 20 years ago, Prairieview was a quiet Midwestern farm town (c.f. Salamon 2003). A grain elevator at one end of Main Street attests to Prairieview's agrarian heritage. The string of quaint antique shops and fancy cafes that now line Main Street, however, reveal changes that have come with recent growth and upscale residential development. Only 15 minutes by highway from a small city (population 100,000), Prairieview was ripe for development as a bedroom community. Such development yielded explosive growth with the village population increasing from under 2,000 in 1980 to over 4,800 at the time of the study (U.S. Bureau of Census 1980; 2000). Attracted to Prairieview by its scenic beauty and quality schools, newcomers are younger and better educated than old-timers (See Table 2). Annual income averages and housing prices have risen steadily along with the population. Thus, according to Salamon (2003), "...in just two decades the village transformed into an affluent community, suburban rather than rural small-town in character, all white, and solidly Republican."

[Insert Table 1 Growth and Change in PV about here]

Two miles from Main Street, across the highway, and just outside the village-zoning jurisdiction is the large mobile home park mentioned above (See Figure 1). Developed over 30 years ago on a section of the owner's family farmland, the park remains bounded on one side by cornfields. In the early years, the park was modest in size compared to its current capacity of 600 units. Today, the park of some 1600 residents (in 560 occupied units) on 30 acres is the size of a small town. In fact, the park population is large enough to comprise its own census tract.

[Insert Figure 1: Map of PV about here]

Despite the trailer park having tenure in Prairieview, as heard in the opening remarks, its presence in this now "elite" village is not welcome. Speaking of the relationship between town and the trailer park, a Prairieview official explains:

Most of Prairieview thinks the trailer court is low-income. Most free and reduced lunches in schools are served to children from the trailer court. Most police and ambulance activity comes from the trailer court. Residents there are just never going to pay their way [in taxes] and, because of that, the trailer court is the focus of the entire community's wrath.

Thus, class differences between the park and town are clearly drawn in Prairieview.

Findings

Although no items during any of the interviews asked explicitly about social stigmatization based on park residence, adults and youth alike consistently reported such experiences. While social stigmatization was spontaneously described by twelve of the respondents in the original survey sample (N=85), eleven of these cases were among the fifty-one households that included children or youth. That is, for just over one-in-five families with children (21.6%), social stigmatization defined their residential experience in the park and village. Within the intensive sample, the prevalence of negative social experiences was even stronger. Four out of five of the families in the intensive sample (13 of 16) described incidents of social shunning or stigmatization that functioned based on their residence in the mobile home park. Thus, being treated as is you are from "the wrong side of the tracks," was a common experience shared among park households who contained children. The meaning of such

treatment, that is, how stigmatization shapes daily life within these households is made clear in their accounts of stigmatization.

One six-year park resident explains that she tries to avoid revealing that she lives in the trailer park when outside its boundaries:

I never tell anyone where I live. If they ask I say Prairieview. I'll do almost anything to avoid saying I live in [trailer park]. I'm too embarrassed about it. My boss didn't even know until the other day and he was so shocked. He said, 'You live in [trailer park]!' Such attempts at managing individual or family identity by not fully revealing park residence were commonplace.

Another mother explains why many families, despite their satisfaction with their home and neighborhood want to restrict their park residence to a short stay:

When we first moved here, the first two years were great. We couldn't have found a safer, better environment anywhere. The biggest problem was discrimination against people that live in [trailer park] by those that live in Prairieview. They ask you where you live, and you say you live out in the country by Prairieview. But if you say you live in [trailer park] then they turn on you—they don't want anything to do with you. Even in the middle of church this will go on. That's why people only want to live here a few years and then move on— because of the discrimination. Especially those with children, because they know that if they get them out and move them into Prairieview, the kids will suddenly be O.K.

Experiences with social marking based on place of residence extended into the context of school as well. One mother of three, all products of the Prairieview schools reported:

They do consider this "The Project" in Prairieview. There's a difference between those who live here and those who don't in the way they treat the kids. My niece lived here. Then she moved out to a farm. She says the way they treat [them] in school is completely different.

Another mother of elementary students emphasized:

I don't like the way they treat us. It's really bad for the older kids. They get treated like they're from the wrong side of the track, even by the teachers, but mostly by the other

kids. It not the kids' [from town] fault—it comes from their homes—their parents. Stigmatization in the schools extended beyond the social to include experiences that shape academic opportunities among park children and youth. A mother, who grew up in the Prairieview trailer park, explained how park high school students, in addition to social marking, are academically marked by place of residence:

My brother-in-law, his ex-wife just passed away, and he got all four of his boys. They just moved here to live with him. His two oldest ones are smart—*very*, *very* smart. He went to Prairieview to register them for school and they automatically signed them up for all general classes. It took him taking transcripts, opening them, and literally reading them to the school for them to realize that these kids needed to be in advanced classes. That's a prime example that just because of the address they automatically assumed that general classes was all they could handle.

Park youth perceive this academic treatment as well. Speaking of her treatment at the local high school, one straight A student said:

It was like I was assumed to be stupid. Like when the teacher hands back papers and says there were so many A's and so many B's. Everyone tries to guess who the A's are.

They never think it could be me. Even when I say I got an A, they're like, 'No – it couldn't be you.' It's not the teachers. It's really just the kids. The parents teach them that at home. That's how they grow up. When I walk down the hall, the way I get hailed, the kids call out 'Hey Trailer Trash.' I'm good at blocking things out though. I hardly hear it anymore.

Stigmatization of children and youth in Prairieview carried over to sports and extracurricular activities as well. Prairieview offered a variety of formal activities for children and youth. Park children played on Little League teams, belonged to scouting troops, and participated in the local Boys and Girls Club. Park youth played on school sports teams, attended church youth groups, and worked at part-time jobs. Prairieview children and youth reported taking advantage of town activities in fair proportions yet their experiences were shaped by park residence. A six-year Prairieview park mother reports:

When we first moved in, we had this group of girls in the [park] yard doing 'Go team go!' and all that. One of our neighbors came over and said, 'You can forget about thatabout her making cheerleader. We're from [trailer park] did you forget that?' Well, when I heard that, I thought we needed to show them even more. [Daughter] went ahead and tried out. When she made cheerleader that was the happiest accomplishment of my life. I went in to Mr. [park owner]-he and I are friends- and I told him she made cheerleader. I said [daughter] is the first girl in the history of [trailer park] to make cheerleader. You ought to give her a medal or something!

Thus, a general concern exists among Prairieview park households that "making the team" is possible, but harder for trailer park youth. Other, more formal requirements for park residents' eligibility for town activities shaped participation as well. Prairieview requirements

such as extra fees (e.g. \$40 for a library card) for park resident participation are overt, while other requirements involve subtle differences in the treatment of park children, youth and their families. Referring to the extra fees, a Prairieview park mother says, "It's too expensive--you have to pay extra for everything if you live out here. There's a huge extra fee even to get a library card." The extra fees erect barriers for park youth's participation in school sports. A mother of two teens, both involved in sports explains, "We have to pay more because we're out of town. It cost about \$100 a sport. There's a scholarship, but the kids get looked down on, so forget that."

Thus, in Prairieview, trailer park residents—both adults and children—appear socially isolated from rather than integrated into the potentially resourceful social networks of a small town. Yet more than just excluding park residents from access to social resources and opportunities, the treatment of Prairieview children and youth in particular places them at risk within the context of their small town.

Park youth, in general, feel unwelcome hanging out in Prairieview. Parents consider treatment of park children and youth by Prairieview police as punitive. Describing his move into the trailer park as, "The biggest mistake I ever made," a father of four says, "When we lived in town, the kids were treated well. Now they have trouble." Providing an example of this trouble he explains:

I'm so disappointed in [son] right now. I had asked him to go to the dump and get rid of a load of junk, but for some reason he dumped it where a friend told him to dump it. Sure enough, it was private property. The next morning we had the Sheriff at the door, because my mail was in there, and my name was on it. The Sheriff insisted on writing him a ticket. I told the Sheriff, 'Can't he just go out and pick it up?' The Sheriff didn't have to

write him a ticket. [Son] just made a mistake, and trusted someone he shouldn't have trusted.

Repeatedly, Prairieview park residents report police as being less tolerant of park adults and teens. Thus, park youth feel on guard when in Prairieview. Even young park children are not allowed to make a mistake in Prairieview. Relating an incident when three, third-grade park-girls were caught stealing candy; a teacher who knows the girls is unforgiving. She commented, "I would like to throttle the little criminal myself!" Rules thus are applied rigidly to park children and park youth alike, despite Prairieview being a rural community that might be tolerant of such offenses if the family reputation was known (Schwartz 1987; Salamon 2003).

Upscale Suburban Development and Social Inequality

We now turn our attention to discerning the conditional features of place that emerge as most salient to the production of the kind of social inequality documented above. Four features that emerged as particularly powerful are described below.

Upscale development and a widening economic gap

"If you're not a doctor or lawyer and you live in Prairieview, you live in the trailer park."

-park resident of 6 years

Upscale suburban development means that the socioeconomic between park and town residents is widening (See Table 2). In Prairieview, when median town-household incomes for are compared with median park-household incomes for 1998, on average, park incomes are close to \$30,000 below those of the town. Increased upscale suburban development in the last decade has widened this gap. The Prairieview average household income of \$57,574 annually almost doubles that of the park households with children at \$30,225 (U.S. Census 2000). Thus, in the

context of Prairieview, income disparity places trailer-park households in the category of *relative poverty* (Jensen 1996) when compared to newcomer households in town.

[Insert Table 2: Comparative Town-Park Socio-Demographics about here]

Yet residents in the Prairieview trailer park make it clear that such an assigned place in community economic hierarchy does not fit with their image of self. Trailer park households in Prairieview do not see themselves as poor. When asked to provide their socio-economic status, half (49.4%) identified themselves as middle to upper-middle class. Thus, treatment in town as less than that does not fit with their self-assessed economic position. Another mother with children in elementary school who grew up in the park herself explains:

We've been really lucky- both kids have had great teachers, but they always assume. They assume way too much. At the beginning of last year, I went in to register both my kids. As soon as I walked in, the principal handed me a lunch waiver form. They assume that because you live in [trailer park] that you qualify for that. Our son wore an old pair of tennis shoes to school. He came home with a note saying they were giving new shoes to all the *needy* kids at school, and he was on that list. I sent a letter back to the school informing them that *my* son did not *need* anything. They just assume, and that's what gets to you.

As homeowners who see themselves as doing well economically, trailer park households in Prairieview feel defensive about their treatment as lower-class citizen in town.

The cost of upscale development and taxation issues

"Prairieview thinks we don't pay taxes. Each lot pay \$100, but more if it's newer. And there's a real estate tax for the owner." - park resident of 24 years

During the early years of growth in Prairieview, the village was not prepared for the additional costs development would bring to support the expanded infrastructure needed in terms of schools in particular (Salamon 2003). Thus, upscale suburban development worked to burden the residents of the village who now pay among highest property tax rates in the state. As indicated in several previous statements, this kind of taxation to support growth are a pressing issue in Prairieview- an issue that has helped to focus "the entire community's wrath" on the trailer court. Homes in a trailer park are taxed differently than are conventional homes. The park owner, as landowner, pays the property taxes rather than individual homeowners paying. Further, owners of land located outside of the village limits are exempt from town property taxes. In Prairieview this situation results in park residents being seen as a financial burden by town residents.

A Prairieview village administrator sees the tax situation as justification fro the extra fees assess park residents. He explains, "We had to offset the extra costs some way. Since those families are outside of the village limits they don't pay the same taxes as the families living in town." Yet, again park residents see the situation differently. As heard above, the feel they are paying taxes in the form of their monthly lot rent in the park. Trying to intercede on behalf of the park residents, the Prairieview trailer-park owner offered the town youth recreation programs use of his park's ball field and swimming pool (the only pool in the area) in exchange for waving the extra fees. No town children or teams have taken advantage of his offer and the fees stand.

Upscale development and concentrations of wealth and poverty

"Out here we're the wrong side of the tracks."

The greater socio-economic distance between the "haves" and the "have-nots" in Prairieview is geographically as well as socially defined. Zoning regulations coupled with the kind of population shifts that come with upscale suburban development have worked to create a geographic concentration of wealth and disadvantage within the township. A map of the income distribution in Prairieview Township reveals the park and adjacent apartments as the only "poor" place of residence. The park appears as an island within a middle-to upper middle-class sea.

[Insert Figures 3 about here- Map]

Zoning regulations and land use practices have implications for the production of inequality as well. In Prairieview and the surrounding area, trailers or mobile homes must by, zoning ordinance, be located within a mobile home park or a zero lot-line subdivision. Thus, free-sited mobile homes—that is mobile homes sited on owned land rather than in a trailer park are absent in Prairieview. Such regulations mean that despite having attained the status of owning a home, park residents are not allowed to own the land on which their home sits in the way conventional homeowners do. Park residents in Prairieview are then automatically lower status in a rural social hierarchy where land ownership and control is critical as criteria for placement. Resident comments make it clear that according to this hierarchy, "Out here we're the wrong side of the tracks." Mobile homes, the most affordable housing available to rural families of modest means are in essence ghettoized and park residents bear the social cost in Prairieview.

Diminishing Sense of Place and Spatial Inequality

"We don't feel like we belong to any community here."

Prairieview park residents lack important connections to community. Fewer than one-inseven parents in survey households with children find full-time work in Prairieview. Most Prairieview parents (68.1%)) disperse each day to work in adjacent metro areas. Only18.8% of Prairieview survey parents report shopping for groceries in Prairieview. More often (64.6%) groceries are obtained in the city where these parents work. In general, few Prairieview park families attend church in town, read the local paper, or vote regularly in local elections. Thus, according to standard measures that attach homeowners to community, Prairieview park residents have few connections.

Spatial characteristics of community contribute to the patterns of engagement. As described, Prairieview was ripe for suburban development as a bedroom community due to proximity to a small city only 12 miles to the east (Salamon 2003). Given their treatment in Prairieview, being located so close to a wider market for jobs, shopping, worshiping and recreating naturally draws park parents out of town to meet these needs.

Yet, across the study park, parents held a strong preference for rural or small-town life (82%) rather than the city regardless of distance and proximity. The manner in which trailer park families take part in small-town life, however, does not realize this preference. For trailer-park residents, Prairieview is only a town near which their home is located rather than a community in which they participate. One resident explained the distant relationship of Prairieview to park parents' lives: "It's a roof over our heads and place to live and that's all." Like their upscale suburban neighbors in town, park households appear to have little allegiance to Prairieview (Salamon 2003).

Conclusion/ Discussion

The social and physical place that a trailer park holds within Prairieview structures dayto-day experiences for park families. While physical proximity might potentially facilitate integration of families into the social fabric of place, the strong distinctions of class division that derive work in ways predicted in the literature (Duncan 2000; Furstenberg and Hughes 1998; Sampson 2000) to erect barriers to such integration. As shown, daily mental comparisons made by town and park residents within each site are meaningful to park adults and children. Park children and youth, unlike their parents, cannot avoid engagement in Prairieview. Town is where they attend school each day, where they may form friendships, and where potentially they spend their leisure time. For rural youth, in particular, town is where they define themselves as belonging, and where they are defined by the world outside of neighborhood and home (Childress 2000; Schwartz 1987). Whether children and youth define themselves as valuable or bothersome in the context of community has implication for developmental outcomes (Elder and Conger 2000). Thus, the differential treatment of trailer park residents by Prairieview indicates that the kind of exacerbated inequality produced in Prairieview has the capacity to shape life chances.

Our findings suggest that upscale suburban development may function as a mechanism through which rural working-poor families and social disadvantage come together in space. When such development functions to isolate trailer park families and youth, in particular, from resources and opportunities it has important to quality of life. How suburban development functions to produce exacerbated inequality in Prairieview has implication for policy efforts aimed at reducing the effects of poverty, and promoting the well being of lower-income rural families and children across the U.S.

Local planning and decision-making processes around development need to take into account how an influx of new residents might transform the social structure of place. Development efforts that try to balance the kind of newcomers attracted to a community can prevent the sort of economic gap that left we have seen to define park residents in Prairieview as economically and socially separate from the majority of town residents.

Land use planning and zoning policies need to strive to integrate development across social and economic boundaries. In this way the emerging concentrations of wealth and disadvantage that residentially segregate the poorer households from the wealthier can be avoided. Further, residentially segregating mobile homes into a park on the edge of town does little to support families' access to the kind of small town life they desire. Allowing for the free siting of mobile homes on owned land proves another option that better recognizes the investment mobile home owners make.

Finally strengthening social resources through developing traditions within the trailer park itself would make that context a more socially resourceful rather than isolating neighborhood. Residents spoke fondly of days where there had been more of a sense of community within the mobile home park. A fourth of July picnic or neighborhood development project might bring back those resourceful connections.

Our study has some distant limitations in that we assessed relationships between upscale suburban development and social stigmatization by focusing on residents of a mobile home park, an already socially denigrate context. Yet, as families who own the home in which they reside, these families are better off than many other working poor and poor households across the rural U.S. That they should be so effectively excluded from small town life despite this status likely means that poorer households experience a kind of social inequality that even more greatly exacerbates daily life.

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