

## Converging Crises: Rhetorical Constructions of Eugenics and the Public Child

Katrina M. Powell

. . . whenever the superintendent of certain institutions including the above named State Colony shall be of opinion that it is for the best interest of the patients and of society that an inmate under his care should be sexually sterilized, he may have the operation performed upon any patient afflicted with hereditary forms of insanity, imbecility, etc., on complying with the very careful provisions by which the act protects the patients from possible abuse.

—Oliver Wendell Holmes

When Justice Holmes wrote these words for the Supreme Court's 1927 majority opinion in *Buck v. Bell*, he upheld Virginia's 1924 Eugenic Sterilization Act. Carrie Buck, the plaintiff in the case, was an unwed mother and a child herself, and was confined to the "State Colony," or the Virginia Colony for Epileptics and Feeble-minded. The Supreme Court's infamous ruling sealed the fate of Buck and other young women like her who were labeled sexually deviant and genetically inferior. During the Progressive Era of social and educational reform, the white elite perceived crises of sexual deviance, lower intelligence, and criminal behavior and believed these "afflictions" to be hereditary, and it believed the theories of eugenics and purifying the gene pool was the answer. Consequently, legislation like Virginia's racial integrity laws was easily passed and compulsory sterilization of "feeble-minded" children was legalized. More often than not, these children were poor and the methods for determining their feeble-mindedness questionable. Despite Holmes' confidence in due process of this law, the forced sterilizations largely took

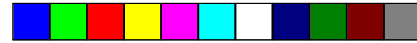
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place without patients' consent or knowledge, compromising their human rights. The elitist language in Holmes' opinion describing Buck and the other "inmates" at the state-run hospital, in both the Supreme Court's decision and Virginia's racial integrity laws, allowed the state and its decision makers to treat people unfairly, especially vulnerable populations such as children, people with intellectual disabilities, or those living in poverty.

The 1924 Sterilization Act has since been repealed (in 1974), and in 2002 Virginia Governor Mark Warner issued an official apology. Additionally, Virginia legislators have proposed providing reparations for those forcibly sterilized.<sup>1</sup> However, contemporary laws that purport to offer protections to children remain ambiguous enough to be malleable; that is, they continue to be enacted depending on decision makers' prejudices, interpretations, perspectives, and motivations. Decisions that adults make on children's behalf, or the "will of adults," do not always serve the best interest of the child, and indeed children are often not provided due process.<sup>2</sup>

While eugenics has been addressed from historical, sociological, and cultural perspectives (Lombardo, Black, Cogdell and Currell), there is relatively little work that addresses the rhetorical implications of eugenics discourse.<sup>3</sup> I address the far reach of eugenics by examining a law that was passed nearly at the same time as the racial integrity law: Virginia's 1928 Public Park Condemnation Act, a law based on the state's right of eminent domain, or, in other words, its right to "condemn" a property owner's land if that land is determined necessary for the "public good." In the same way due process was often not afforded to those under racial integrity laws, those vulnerable populations who lost their homes through eminent domain arguably did not receive due process.<sup>4</sup> Examining eugenics discourses from a rhetorical perspective offers insight into the ways that public rhetorics were influenced by eugenics, even as eugenics was falling out of favor within the science community.<sup>5</sup> The rhetorical impact had lasting material consequences as people lost their homes. Understanding the confluence of the ideologies of eugenics together with ideologies of progressive social reform may lead us to understand how those knowledges moved within political and social structures of the day and thus impacted seemingly disparate legislation like the Public Park



Condemnation Act. Eminent domain laws converged with racial integrity laws, producing long-term consequences for several vulnerable populations. By analyzing these layers of vulnerability, I argue that recent apologies to and reparations for those harmed under these laws do not address the underlying inequities of the law. In 1927, when Justice Holmes argued that “the [sterilization] act protects the patients from possible abuse” and ensures due process for patients, he likely did not recognize the rhetorical power of eugenics discourse in decision-making processes about children and other vulnerable populations.<sup>6</sup> As the white elite perceived “crises” of racial impurity and inherited traits that included poverty and sexual deviance, they became pretexts for state intervention, compromising due process in both racial integrity laws and eminent domain. This essay argues, then, that the convergence of conservation, 1920s social liberalism, and racial purity were the seeds for long-standing justifications for the exclusion of children from the public sphere. Interpretation and enactment of these laws across vulnerable populations asks us to consider the ways that rhetorical constructions of racial purity influenced, and continue to influence, attitudes and beliefs about the poor and others rendered displaceable.

### **Eugenics, Rhetorical Categorizations, and Regulating Bodies**

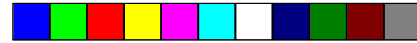
In order to analyze vulnerabilities, I turn to philosopher Giorgio Agamben’s notion of exclusion (through discursive labeling) and its consequence of abandonment (by the state) to frame my understanding of the implications of the various pieces of legislation passed in Virginia in the 1920s. Girls’ bodies were excluded from the protection of the law, particularly if they were perceived as sexually promiscuous. The *Buck v. Bell* case established the specificity of regulating girls’ bodies and sexuality and, therefore, justified Virginia lawmakers’ and medical professionals’ elitist views about the poor. A fear that the sexual behavior of poor whites diminished the gene pool led Virginia lawmakers to pass racial integrity laws and demonstrated their “growing belief in the need for state regulation of sexual behavior” which they deemed “dangerous” (Holloway 22). It was the fear of Carrie Buck’s perceived sexually deviant behavior,



together with the belief that her behavior and intellect would be passed on to her children, that persuaded decision-makers that sterilization was best for her and for society as a whole.

As various historians of eugenics have noted, eugenics discourses, understood now as pseudo-science at best, gained enormous popularity in this country in the 1920s.<sup>7</sup> Eugenicists believed that heredity determined mental condition, slovenliness, and poverty, and thus categorized the “feeble-minded” through a system whose terms included “idiot,” “low-grade imbecile,” “medium grade imbecile,” “high grade imbecile,” and “moron.” Following accepted eugenics theories, decision-makers perceived children exhibiting behaviors such as “fits” and “slowness” as genetically inferior, threatening to the state, and consequently labeled them through the crisis of poverty. The ability to categorize is arguably, as Agamben explains it, what makes us human. We are obsessed with categorizing and labeling (and thus signifying). Categorizing, creating boundaries, and defining one as an “other” (such as disabled, poor, refugee) places particular individuals and groups outside the law and therefore, subject to abandonment by the state. Blamed for their own “immiseration,” children of the feebleminded in particular become the “excluded exclusions, those for whom there exists no possibility of return” (Mitchell 102). Carrie Buck and her child were easily abandoned by legislators because her dangerous behavior was her fault.

Rhetorically, however, we recognize now the socially constructed nature of such categories as “feeble-minded.” For Agamben, being able to categorize is what makes us human, yet paradoxically, the act of doing so is violent. This paradox is crucial to understanding the convergence of eminent domain discourse together with eugenics discourse. The rhetorical construction of the othered body as dangerous or sexually deviant is inherently violent because this limiting language excludes the other from protection from the law. So, while categorizing and placing labels on young women like Carrie Buck was ostensibly to protect her and society, the state simultaneously allowed itself to be exempt from that law.<sup>8</sup> The state therefore justified policing the so-called feeble-minded (and engaged in human rights violations of forcible sterilization) by placing the state over the individual.



Likewise, the power of eminent domain, through the Fifth Amendment, is paradoxical. While laws like the Public Park Condemnation Act, justified through the state's right of eminent domain and public use, establish a sense of order, they are specifically written to allow the state to forcibly take land from property owners. Indeed, the very existence of such laws suggests that there is a "possibility of transference, the possibility, necessarily, inscribed in property right, of someone else's potential ownership of the same thing. The infinite displaceability of property is at once affirmed and denied by property right. . . . Property right, therefore, is not something inherent or proper to a person; it is the denial of commonality and displaceability" (Ryan 159).<sup>9</sup> The state's ability to take or condemn land, then, functions similarly to other rights laws. They are written to ensure protection, but sovereign power allows states to also exempt themselves in time of crisis or perceived threat from these laws, thereby abandoning the individual for state interest.

Legal scholar Martin Guggenheim recognizes similar paradoxes as he argues that it is the malleability of children's rights laws in the U.S. that pose problems in actually protecting children from harm. In his discussion of the limits of rights discourse generally, and the U.S.'s refusal to ratify the U.N.'s Convention on the Rights of the Child more specifically, Guggenheim explains that "'rights' for children in the United States tend to be so malleable that they almost lack any content. . . . Children lack political power, and the treatment they receive is, ultimately, little more than a reflection of the will of adults" (44).<sup>10</sup> He explains further, "when courts are asked to enforce or apply constitutional rights that children supposedly already possess, they are remarkably free to decide how comparable the adult version of rights ought to be when applied to children" (46). Guggenheim explains that decision-makers have "leeway" and "wide latitude" (47) in interpreting what rights children have and how to "determine how much weight to give to the state's interest in enacting" the law (47). Guggenheim explains this through search and seizure cases, arguing that the state's interest largely overrides children's right to privacy. His point is to show how in marking the specificity of children's rights (through the U.N. or U.S. laws), "we build into all inquiries room to deny children the very things we mean by the use of the term 'rights' as applied to adults" (50).



These paradoxes among laws and ordering, then, bring us to an analysis of perceived crises. Using Agamben's theories to discuss the signifier "feeble-minded," Ryan's explanation of displacement and property rights, and Guggenheim's notion of the malleability of the law as it relates to children, we can examine Virginia's racial integrity act and eminent domain law together to understand how children might become a threat to the state and how they might be excluded from the nation's Fifth Amendment, exempting Virginia from its own constitution and the U.S. Constitution in a moment of so-called "crisis."<sup>11</sup>

The perceived crises, then, in sexual behavior, mental capability, and poverty led eugenicists to advocate sterilizing those people perceived to be threatening in these areas. In the 1920s, many states, including California and Virginia, enacted laws that allowed for compulsory sterilization.<sup>12</sup> After Virginia legislators passed the 1924 Eugenic Sterilization Act, Carrie Buck's case was enthusiastically brought to the U.S. Supreme Court by proponents of eugenics who wanted to have the case heard so that this practice would be federally sanctioned. Her advocate was a proponent of eugenics, and his close colleague drafted the Virginia sterilization law (Lombardo 2008). This was a clear conflict of interest: he had no intention of advocating for Buck's rights.

As a famous case in the progressive movement, Buck's trial was widely publicized in various news articles. She had been labeled feeble-minded because she had given birth out of wedlock. For eugenics proponents, this signaled promiscuity, thought to be hereditary; indeed, her mother had been institutionalized four years earlier. In fact, Buck had been in foster care and raped by a nephew of her foster parents while in their care. But even without this fact, it was the testing of Buck's daughter, Vivian, which sealed the case against her. Vivian, at six-months old, did not respond quickly enough to a visual test, which led a nurse to testify in court that Vivian was "peculiar, not quite normal, probably feeble-minded." Discourses of normativity and the fear that women like Carrie and her children would behave outside of normal social codes fueled the court's decision to uphold Virginia's compulsory sterilization.

In his majority opinion, Justice Holmes wrote, "It is better for all the world, if instead of waiting to execute degenerate offspring for crime, or to let them starve for their imbecility, society can prevent those who are



manifestly unfit from continuing their kind . . . three generations of imbeciles is enough” (Buck). This exemplifies the popular thinking of the time—that poverty and crime were hereditary. But the real crisis, according to the court, was that Carrie’s child was an “imbecile.” The discursive power of the belief that generations of children of imbeciles would continue through poor women like Carrie persuaded the court to uphold Virginia’s laws, and Carrie Buck was subsequently sterilized against her will, so that she could not have any more “peculiar” children.

The Supreme Court ruling legitimized the white Virginia elite’s desire to perpetuate and protect the purity of white Americans. Eugenics was believed to be a progressive ideology, and “Virginians were able to modernize their identity while maintaining the purity of their state through the coerced sterilization of minorities and undesirable whites alike” (Dorr 262). The perceived crisis, then, during the 1920s was the mixing of races and classes.<sup>13</sup> Influential politicians and scholars, including John D. Rockefeller who funded the Eugenics Record Office at Cold Harbor Springs in New York, were all persuaded by heredity theories.<sup>14</sup> The theories of eugenics were widely publicized, and when the U.S. Supreme Court ruled in favor of Virginia’s sterilization practices in *Buck v. Bell*, the public was inundated with representations of Carrie Buck as promiscuous and poor.

My aim here is not to historicize eugenics, Virginia’s laws, the long-term implications for families and communities, and its influence on Nazi law and practice.<sup>15</sup> What I wish to stress here is the representation of *children* as a means to persuade the public and the U.S. Supreme Court of the legitimacy of forced sterilization. After this case, more than 8,000 Virginians were sterilized. The proliferation of representations of children and their parents in the context of their poverty or their so-called social “transgressions” shaped the public’s view of what justified forcible sterilization. Holmes’ mention of due process provided the rhetorical rationale for protecting women like Buck, even if materially it was never enacted. As Holloway argues,

Informed consent may have been difficult or impossible to obtain, given the disparities of education, income, and power between parents and officials . . . the rhetoric of the campaign for the sterilization statute diverged from its implementation after



1927 in terms of the gender of those sterilized. In Virginia, as in many other states, women were sterilized at higher rates than men, with women representing almost 60 percent of the people whom physicians sterilized in Virginia between 1928 and 1940. (57)

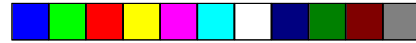
According to Holloway, sterilization was tied to Virginia elites' belief that there was a connection between "'fit' citizens and a healthy economy," beliefs that made Virginia "a leader in the South" (51). Virginia lawmakers tied their sense of economic viability with the ability to purify the white race.

Not only was the ideology of the eugenics movement popular, the terms used to classify the levels of feeble-mindedness were commonly used by doctors, judges, lawyers, and legislators, and subsequently by social workers, journalists, and the broader community. Therefore, when Virginia business owners were advocating for a national park in Virginia's mountainous region during this same period, rhetorics of public use and the public good began to merge with rhetorics of poverty and progressivism. Poor people, the belief was, needed to be moved out in order to conserve the land.

### **Converging Discourses of Property Rights, Conservation, and Purity**

During the Progressive Era of Education and Social Reform in the early twentieth century, the poor and their children held a precarious relationship with the state. Before the establishment of the Department of Public Welfare, the poor were primarily seen as the responsibility of churches, missions, and community-run poor houses.<sup>16</sup> As the Progressive Era saw social and educational reforms, many laws were written to make states and local governments financially (if not morally) responsible for its "needy" citizens. Federal legislation was passed that provided matching funds to encourage states to provide public assistance. As early as 1912, the Children's Bureau Act, together with the Child Labor Act of 1916 and, later the establishment of the Federal Emergency Relief Administration of 1933 helped to create a sense of federal and state responsibility for





public assistance. However, intertwined in these changes were paternalistic attitudes toward the poor, as those charged with providing assistance grappled with their own prejudices and beliefs while determining the best ways to provide such assistance and to whom.

When Roosevelt officially dedicated Shenandoah National Park in 1936, the Skyline Drive was nearly complete and the relocation of families was well underway.<sup>17</sup> Many families left their land willingly and had the means to find alternative housing. Those who could not afford alternate housing were assisted by the Resettlement Administration (USDA) and by the newly formed Department of Public Welfare, often going through rigorous tests or surveys to determine whether they qualified for public assistance. During this process, the social workers and public health officials planning for mountain residents' cases for relocation were influenced by the recently passed public welfare and eugenics laws. In 1924, Virginia passed two laws on the same day that had an enormous impact on its citizens and on the legal community in subsequent decades. The Eugenic Sterilization Act (SB281) and the Racial Integrity Act (SB 219) were passed together.<sup>18</sup> As the country was moving toward an ethic of publicly provided assistance, programs were being managed by decision-makers who were persuaded by the popular and racist theories of eugenicists. The rhetoric of inherited poverty can therefore be seen in the resettlement and relocation discussions among state and federal authorities, as well as among the social workers and public health officials.

National and state discourses of eugenics provide the particular context for understanding the process of removals once Shenandoah National Park was founded. Many of the same Virginia legislators who passed the 1924 sterilization and racial integrity acts also passed the Public Park Condemnation Act of 1928. Through this act, the state of Virginia authorized the blanket condemnation of nearly 200,000 acres that became the Park. Various archival documents, including correspondence between the park superintendent, park rangers, local social workers, mountain residents, and other state officials provide evidence of the attitudes toward the poor families living in the mountains.<sup>19</sup> For instance, several park service officials were very concerned about the begging that some residents did along the newly built Skyline Drive. As tourists drove

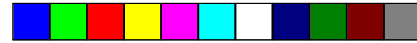


along the scenic 100-mile stretch through the Blue Ridge Mountains, park officials did not want them to encounter the poverty of some of the families living there. Children selling paper flowers along the drive was particularly disconcerting to park officials. One letter written to a park ranger in 1937 highlights this concern:

dear Mr Hoskins since our last conversation i have kept the children off the road but their are some things that i would like very much to know i am sure you do not want to be no respect of person their are some you have prommissed to do some things for iff they would keep their children off the road . . . i am here as you know as a man with good understanding i havent bin given a squar deal by the coart ner the relief workers yet perhaps you thought i was doing wrong by letting the children go on the road yet iff you knew some things you would change your mind.<sup>20</sup>

This letter indicates that the rangers had been directing residents to keep their children “off the road”—that is, the tourist destination of Skyline Drive. Yet, the letter also indicates that if the ranger knew what residents were facing he might understand why children were selling flowers. (It was in some cases their family’s only way of making money.) The “problem” of poor residents along the tourist destination had been debated between state and federal officials for several years before 1937. However, when children became visible on the Skyline Drive, it was the crucial impetus for park officials to make relocating all families a priority.<sup>21</sup> Rendering children invisible by keeping them “off the road” was consistent with the general attitude toward the poor and their children at the time. The Park Service’s decision-makers were in contact with social workers, social-psychologists, and government officials whose assessment of poor families in the park affected the decision to remove them.

Just after Virginia’s *Buck v. Bell* case was decided, social-psychologists Mandel Sherman and Thomas Henry employed a University of Virginia sociology graduate student, Miriam Sizer, to conduct “Tabulations” for the Washington Child Research Center, an organization funded partially by the Rockefeller Institute, a proponent of eugenics. The University of Virginia, also well known for its teachings of eugenics, is located in Charlottesville, only thirty miles from Shenandoah National



Park.<sup>22</sup> Sizer lived among the families in the mountains of Virginia as they were in the process of being relocated and had taught some of the school children there. She is the crucial link between discourses of eugenics and the removal of families from the Park. The results of Sherman and Henry's research, based in part on Sizer's "surveys" of park communities, were published as *Hollow Folk* in 1933, just as the Civilian Conservation Corps was building the Skyline Drive.

Sizer's tabulations, recorded in the same vein as eugenics field studies, describe her interactions with the families of the Park and in particular she comments on the care of children. She says in one instance,

When on May 8, 1932, I washed Sam Corbin's children to take them to the University of Virginia Hospital, Children's Clinic, Ellis Corbin had not washed all over since the previous September. I washed and rinsed these children and they needed it. These children are no exception to the general rule in many homes where Corbin Hollow slum conditions are found. (3)

She describes another child whose father was from Corbin Hollow: "But though the child was big enough to wash his own face, his mother did not tell him to do so. So I judged that here there is a little hangover [from Corbin Hollow] of low cleanliness standards" (3). Sizer attributes the mother's "standards" for her child as a result of having grown up in Corbin Hollow. She also says that, "This community is lawless along such lines as fire setting, stealing, wonton destruction of property, housebreaking, fighting, drunkenness, wife beating, dishonest weights and measure, extortion, etc." She also reports, "It also appears that there is little realization of the significance of the change in their lives, and that few have made any plans for this change. This means that the problems of family placement of park residents are practically unsolved." In both her tabulations and surveys, though steeped in the social values of the time, Sizer implores NPS and state officials to help the families in their moves. She is clearly concerned with the families' abilities to adjust to moving and saw the local communities as having responsibility. For instance, in her "Tabulations," she saw county employees such as the County extension agent and the Public Health Nurse as being hampered by the Board of Supervisors. She says,

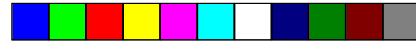


The group that controls Madison County is an entrenched oligarchy. Every agency is forced either to bend to its wishes or to resign. Politics, Supervisors, School, such agencies as Home Demonstration and County Agents, Red Cross Nurses, Public Health Nurses, are dominated and directed by the ruling clique in Madison for the good of the lowlands, and primarily for the good of the controlling group. . . . Thus every agency for improvement and enlightenment of this group of mountaineers has been restricted and curtailed by local Madison County Government and policies. (60–61)

She urges the National Park Service to understand that,

There is a need for the citizens of Virginia to sense their responsibilities and civic duties pertaining to the native mountain dwellers who of necessity, and also of choice, are giving up their mountain homes for the benefit of State development. . . . There is a need for the sympathetic understanding of the mountaineers by any community into which they may go. Upon such an understanding will depend their community adjustments such as church, school, and social group integration. (63)

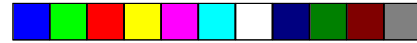
Sizer implores officials to understand the difficulties of the families; however, despite her sense of responsibility, it is clear Sizer shared the values of the day about social propriety, cleanliness, medical solutions, and Progressive Era notions of the ways people should be helped based on white middle- and upper-class values. While some of her concerns about sanitation and education were justified, they were mixed with the Progressive Era's typical paternalistic attitudes toward the poor. Sizer clearly saw herself as able to rescue the mountain population from their perceived plight of poverty and slovenliness. Indeed, she noted that Madison County did not comply with Virginia compulsory education laws and did not provide adequate education for children. Yet, at the same time, when she assessed residents through these tests, she often blamed them for their poverty, lack of education, and lack of social propriety. She represents herself as an advocate for families, but only inasmuch as she thought they should follow a particular course of action as conceived of by the state—they should be removed from their homes in order to be provided certain standards of hygiene and education. Her assessments were used consequently by state and park officials as the rationale for



moving families. The Park Service Director, for instance, was influenced by a colleague of Sizer's who described "coloniz[ing] the worst of these people" in a letter advocating for their removal generally and specifically mentioning the Colony as the place they would go. When the families who relied on the emerging social services in the state were extremely poor, many of them were sent to state hospitals like the Colony, a common practice for those who had no means to sustain their families; indeed, much of the public was convinced that relocating them was for "their own good." As mentioned earlier, administrators of the state-run hospitals, emboldened by the newly upheld Supreme Court's *Buck v. Bell* decision, routinely sterilized their patients, believing the eugenics discourse that poverty was hereditary.

Like Rockefeller, who was a philanthropist who donated money to the national parks and the Eugenics Records Office, Sizer is a complex character in this drama. Her tabulations are splattered with judgments about cleanliness and ways of life, yet she is also clearly concerned about the fate of people being moved from their homes. She does not advocate, however, that families should be allowed to stay in their mountain homes; rather, she feels that they should be moved but that the government should take responsibility. Sizer, Rockefeller, and others like them exhibited common 1920s socially liberal values where white elites believed they knew what was best for the poor. However, their emerging social values seemed to outpace the lagging eugenics practices that remained in various state run facilities.

In addition to her reports being used in *Hollow Folk*, Sizer also appears in a 1936 government film titled, "A Trip to Shenandoah" (National Archives). There is no sound in the film, so it is unclear about its purpose, but it includes images of various scenic views within the proposed park, activities of park promoters, and the lives of families living in the area. The scenes of mountain residents include eating at a local hotel, receiving donated goods at the post office and general store, and Sizer interacting with families. In one particular scene, Sizer is seen holding onto the neck of a child, presumably to keep him still for the camera, while talking about and pointing to the child's body. It is a disturbing scene, as the child is quite thin, and he is pulling at Sizer's hands and crying. In the next scene the child appears again, dressed in

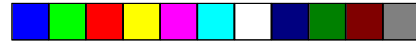


clean white clothes and visibly in better health. Though there is no verbal narrative in the film, one conclusion that can be drawn is that the removal of the child and care under the state will result in better health.<sup>23</sup>

As a result of Sizer's interventions, several families' children were taken away and never returned during the resettlement process (Reeder, Cogdell, Fender).<sup>24</sup> While Sizer was surveying families to help determine the kind of needs they would have in their relocations, the Superintendent of the park, together with park rangers and social workers, were also working toward managing the displacement of families. Most of those they assisted were poor. This work, together with the Carrie Buck case that occurred just a few years before, led the way for Shenandoah families to be put in the care of local state programs steeped in eugenics discourse. By the time families were moved, it was common practice and publicly accepted and virtually unquestioned to label the poor as feeble-minded, which ultimately resulted in their forced sterilization. The result is that the image of the poor child could be erased, both literally and figuratively, from the public memory.

Appalachian scholar Stephen Fender has shown how the book *Hollow Folk* "heavily reflected the methods and assumptions of earlier family studies made or used by the Eugenics Record Office" (140). Labeled as life histories, the descriptions of the "Colvin" family in *Hollow Folk* used similar eugenics categories. *Hollow Folk* was recommended by William Terry Couch, UNC Press editor and head of the Southern Federal Writers Project (FWP) (also one of Roosevelt's New Deal programs) as an example of a systematic study for FWP writers to use as they wrote life histories to document the American South. The life histories program was undertaken by the FWP to give the poor a voice. According to Fender, "the terminology employed by these Southern writers borrowed the rhetoric of the notorious Eugenics Record Office of a generation earlier when characterizing the problems of the landless poor" (Fender 141–42). A particular mixture of literature and sociology, Couch conceived of life histories in terms of the South and its "problems"—the sharecroppers and tenant farmers were seen as "hapless, rootless, shiftless, and degenerate" (144).

As Fender has argued, it is clear that Mandell and Henry, influenced by Sizer, were questioning commonly held assumptions about heredity



and environment. However, because the structure of their study is similar to eugenics studies and the quotes they include about children reinforce the stereotypes about the mountaineer, the study was used to perpetuate the belief that the families were isolated, incapable of making decisions, and lived in a “medieval” period.

Representations of children’s “slovenliness” were used as “scientific” evidence of the parents’ moral decline and the overall hopelessness and determination of the community’s degeneration (Fender 154).<sup>25</sup> But the writers for FWP were progressivists, not eugenicists. The difference between the eugenicists and the progressive environmentalists was that eugenicists saw heredity as the cause of poverty, and environmentalists saw environment as the cause. In either case, the only hope for intervention was to remove the children, both from the environment and often times from their families.<sup>26</sup> As Fender’s research suggests, Miriam Sizer and other sociologists were moving away from the hereditary model of the eugenicists; however, because the rhetoric of *Hollow Folk* was shared with that of Eugenics Records Office reports, the *practices* of removal lagged behind. Therefore, when social workers, judges, and physicians were tasked with removing the families, they reverted to sending them to hospitals where compulsory sterilization was still in effect. Rhetorics of poverty and progressivism merged here to persuade authorities that removal from their “environment” would be the best for the poor. In this way, the management of the poor and regulating bodies as the result of eminent domain law became a convergence of the (so-called) public good both from a conservation perspective and from a eugenics perspective. The fear that the poor would detract from the tourist (and capitalist) value of the park motivated multiple layers of government officials to remove families permanently from the land.

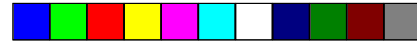
In this convergence of heredity and environmental determinism, many families were caught in the middle as they were assisted by the state. The Corbin family, named “Colvin” in *Hollow Folk*, was a large extended family and its patriarch, Fennell Corbin, who was grandfather of several of the children sent to the Colony, the same hospital where Carrie Buck was committed, and he himself was sent to a similar hospital in Staunton, Virginia. One of Corbin’s granddaughters, Mary Frances Corbin, was seven when she was removed from the Park, along with her mother and

siblings. They were simply too poor to subsist on their own. Mary Frances's removal from her home through eminent domain and subsequent institutionalization and sterilization through *Buck v. Bell* serves as an example of the way that the state regulated children's bodies through eminent domain and sterilization.

It was not the development of the park per se that began the practice of institutionalizing poor bodies, however. According to Edwin Black, "mongrels" and "worthless" whites were rounded up in "mountain sweeps." Local magistrates would drive into the mountains and take them to hospitals. They would only be released if they submitted to sterilization. Children, however, did not understand the consequences of the procedure. Neither did many of the parents, for that matter (Black 3–8). What Mary's case exemplifies is the merging of eminent domain law with racial purity laws. Her failure to be "normal," according to state and local officials, in terms of her poverty and her potential to reproduce similar offspring secured her institutionalization and sterilization.

Mary's commitment papers, located in the Madison County Court House, state that she was "feeble-minded" and prone to "fits." The book holding Mary's commitment papers is titled, "Record of Persons Adjudged to be Insane" and holds many similar documents where individuals' behaviors and attitudes are described. At seven years old, Mary was "suspected of being feebleminded because of temper tantrums, [she] does not take instructions or [...] listen to orders." Her "home conditions [are] so bad that child had to be taken out of home. Cared for by Public Welfare." The court records document that "an approved mental commission [convened] to conclude whether the above named person be feeble-minded, idiotic, [and] a suitable subject for an institution for the care, training and treatment of feeble-minded, [and] idiotic, and whereas the judge or justice has read the warrant and fully explained the *nature of the process* to the suspected person, we the said physicians or approved mental examiner have [decided] June 1942" (emphasis added). The "mental commission" named in the document was comprised of a social worker, two physicians, and the presiding judge. The state's notion of order, of the expected behavior of a child is clear here. Mary was labeled feeble-minded and institutionalized because she did not fit socially appropriate notions of behavior, as dictated by the "commission," all of





whom were likely influenced by eugenics discourses. Though the document states the process was explained to her, it is not clear how a seven-year-old might fully comprehend the implications of her institutionalization, particularly her impending sterilization. As mentioned earlier, Holloway argues that because of various “disparities,” the full explanation and understanding of the process was highly unlikely (57).

Mary’s Certificate of Discharge of 1958 (16 years after her commitment) states that she was committed as “Mentally Deficient’ [and] is hereby this day discharged as *Improved*.” This vague assessment by the institution that sterilized her hardly encapsulates her experience and the state’s complicity in sealing it. When she was released from the hospital, she, like many residents released from the Colony, did not return to her hometown because of her deep shame of having been committed. Many residents remained in or near Lynchburg, forming a new community as was typical of the Colony’s residents (Bishop).<sup>27</sup>

This process of regulating the poor, then, collided with notions of the public use of state lands for a national park. Mary Frances Corbin’s experience as a child in a state hospital serves as an example of the ways that the state regulated bodies in order to render poor children invisible. When I interviewed Mary Frances Corbin in 2010, then 84, about her experiences, I asked her why she thought she was sent to the Colony.<sup>28</sup> She replied, “I don’t know. They didn’t tell me.” Mary said, “after my dad died I was taken away . . . my mama was taken away too. . . . I was just a kid . . . the sheriff of Madison came. . . . I remember they took my brother and two sisters first.” When I asked her again if she understood why she was taken away, she said, “no, that’s all I know. They said everybody was feeble-minded.” Here she indicates that while she knew she was labeled in a particular way, she did not understand why that would lead to removal from her family. In a different interview for a news article, Mary stated that she felt her marriage failed because she could not have children (Bishop). Mary’s forced sterilization by the state, which was enacted in order to regulate her (future) sexual behavior, had the added consequence of placing her outside normative discourses of marriage. Her inability yet desire to have children was a long-term consequence of the state’s regulation of her body. Only through Mary’s willingness to speak about her experiences are we able to draw these connections between her

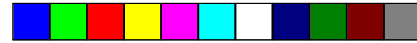


displacement through eminent domain and her subsequent abandonment through racial integrity laws.

Mary has recently appeared in two documentary films and several newspaper accounts of the history of the Colony. In the film “The Lynchburg Story,” she told stories about other girls who complained or misbehaved and had to go to solitary confinement. She said to the interviewer, “I wasn’t gonna say nothing lest I ended up like ‘em.” When she was sterilized, the nurses told her, “it’s for your own health. They didn’t tell me anything it was for when you get married you couldn’t have no children. . . . They did a whole lotta girls that way. I’m not the only one.” Learning the expected behavior and order of the institution, Mary understood it was better to remain quiet than to be sent to solitary confinement. Her silence, though rendering her a certain semblance of invisibility, was the better choice than invisibility through isolation. Her body, as a visible sign of poverty, was regulated and moved in service of the law, both in terms of racial purity and in terms of public use and the public good. Her story, however, remains a stark example of the ways a state’s laws can shift according to perceived times of crisis.

### **Shifting Crises, Revoking Laws, and Issuing Apologies**

Since Mary’s institutionalization, some of Virginia’s laws have changed and society’s perceptions of poverty and high-needs groups have shifted. When Mary was released in 1958, the name of the Colony had been changed to the “Central Virginia Training School and Hospital.” Now known as the Central Virginia Training Center, it serves persons with intellectual disabilities and currently houses 380 clients (at one time it housed 3,000 in the 1970s). This shift in name reflects shifts in law and public perception of persons with disabilities. The Olmstead Act of 1999 required that states provide opportunities for people with intellectual or developmental disabilities to be fully integrated into their communities. Virginia has been in the process since then of making sure its services complied with the Supreme Court’s Olmstead decision. However, when the Department of Justice ruled in 2012 that Virginia’s Training Centers



were not in compliance, Virginia settled the case by closing four of its five centers. This decision was made ostensibly to work toward providing more individualized services, to avoid “warehousing” people with disabilities, and to avoid unnecessary institutionalization.<sup>29</sup> While these goals may be laudatory, many families are very worried about their relatives as they transition and whether the state can or will provide adequate funding or services while their family members move from the only homes they have ever known in the Training Centers to community-assisted living and more independent housing. The controversy continues, albeit differently, as states work toward protecting individuals rights to adequate services while also providing adequate resources to provide those services. According to a 2012 article in *The Daily Press*,

Virginia will close four of its five institutions for housing the developmentally and intellectually disabled and transition those services to the community under a 10-year, \$2 billion settlement the state entered into Thursday with the Department of Justice. The settlement, filed with the U.S. District Court in Richmond, ends nearly a year of negotiations with the Justice Department, which determined after a three-year investigation that Virginia violated federal law by needlessly warehousing those people in institutions instead of providing adequate community-based services. (Potter)

While Virginia was found to be in violation of providing certain services, many families whose relatives live at the Centers are concerned about their future care and are fighting to keep the centers open (See Reed). Given the Center’s history, one might wonder whether families would want their children and relatives to live in one of these facilities. However, the families’ concerns are deeply connected to the state’s ability to provide for remediation plans. That is, families understand that the process of transfer and transition to community housing for their relatives poses a difficult and unlikely financial scenario for the state, where they believe their loved ones will be caught in the middle. While the 1999 Olmstead Act’s rhetoric ensures adequate resources, families’ genuine concern over the material realities for their children are well founded given this state’s history in providing due process to vulnerable populations.



In 2002, then Governor Mark Warner issued an official apology for the state's complicity in forcing sterilization on its citizens. While an admirable move it is only a "soft alliance" (Hesford), the gesture raises the question about who gets to apologize and the continued role of the state in forcibly moving bodies. Bodies like Mary's were easily moved and manipulated because they were seen as substandard, as less than human.<sup>30</sup> When Carrie Buck stood up for herself, they labeled her daughter feeble-minded. By moving the children and representing them as feeble-minded (like Carrie's daughter, Vivian), the rationale made it easier to move and regulate their parents. With Warner's apology and the more recent move toward reparations by Delegate Patrick Hope, Virginia does seem to have moved forward. However, the fact remains that the institutionalized remain in relation to the state. The office of the governor provides the power and position to offer an apology, which is little more than a rhetorical move. If reparations are eventually provided—which notably would be decided by the same governing body that created the sterilization act—they will provide some material impact, but they do not address the underlying vulnerabilities that remain for children and persons with intellectual disabilities.<sup>31</sup> Current laws continue to allow the state to abandon the vulnerable. The figurative boundary-making with discursive laws about the body and sexuality, together with the literal boundary-making through eminent domain, suggest that depending on the current discourse of crisis, the vulnerable are afforded only partial citizenship.

In truth, Mary exhibits no mental deficiencies. The way she was represented, though, first as feeble-minded, then as "improved," asks us to question the ways that the bodies of the poor take on the burden of representation. Her institutionalization as a result of her poverty and vulnerability as a child asks us to consider who qualifies as a human rights subject. It seems clear that Mary lacked a state on which she could rely. The normative frameworks of heredity and poverty operating at the time limited public response to Mary's situation.

Eminent domain laws too have seen a recent reexamination. During the November 6, 2012, election, Virginians voted on a constitutional amendment. The ballot stated,



Shall Section 11 of Article 1 (Bill of Rights) of the Constitution of Virginia be amended (i) to require that eminent domain only be exercised where the property taken or damaged is for public use and, except for utilities or the elimination of a public nuisance, not where the primary use is for private gain, private benefit, private enterprise, increasing jobs, increasing tax revenue, or economic development; (ii) to define what is included in just compensation for such taking or damaging of property; and (iii) to prohibit the taking or damaging of more private property than is necessary for the public use? Yes or No.

This amendment was passed by more than eighty percent of Virginia voters, a remarkable agreement among liberal and conservative voters alike. Virginia, like many states across the country, proposed this change in eminent domain law to try to avoid the situation that occurred in New London, Connecticut, where private property was taken for private development (argued to have public economic impact). As eminent domain laws and human and civil rights laws continue to be rewritten, enforced, and withdrawn, the closure of state facilities like the Virginia Training Center, and the issue of where residents will now go, cautions us to consider the intersections between children's rights and protections with the concepts of public interest and public good.

The revision of the eminent domain law still leaves a majority of the population vulnerable to repossession. "Just compensation" in eminent domain law seeks to protect property owners, but offers no protection for people who live in a space such as renters or tenants. Mary's grandfather owned land in SNP and was compensated a small amount, but his extended family received no compensation for the loss of their homes. This left them vulnerable, then, to the state's provisions for the poor. The children were consequently placed in foster care or became wards of the state. They were therefore subject to the laws of the time, laws that were later repealed, and they were apologized to because of their egregious countering of human rights.

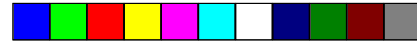
The perceived crisis of an impure gene pool (Sterilization Act of 1924), together with the perceived crisis of the poor selling paper flowers and being visible at a tourist site, worked in tandem to make them the subjects of legal and political exclusions. This examination of children's



rights together with the concept of public use and the public good, reveals the limitations of understanding human rights only through overtly or explicitly racist discourse. The connection between children's rights, representation, and (in)visibility highlights the violent nature of states' exceptions and the ways certain populations can be excluded from state protection. This analysis is meant to highlight the ways that eminent domain can also result in violence as have other laws about racial purity.

The children (and their parents) who were sent to Virginia's asylums in the 1920s and 30s were written about as if they had no agency. Excluding them from decisions about their relocations and operations performed on their bodies resulted from assumptions about their mental capabilities. Rhetorics of poverty, progressivism, and conservation merged with the elite's paternal attitudes toward the poor, philanthropic action through an elitist lens, colliding to result in many communities being convinced that hospitalization (and thus forced sterilization) was in the best interests of the poor and indeed for society at large.

When Mary understood that to be quiet prevented her from isolation, it was the institution's laws that sought to make her and other children like her invisible. The process of othering, silencing, and removing individuals from the public eye to keep those deemed socially unacceptable invisible is a situation examined in multiple transnational and historical contexts. Katarzyna Marciniak addresses this process of othering in her book *Alienhood*, where she examines issues of invisibility, displacement, and immigration (particularly eastern European immigrants). According to Marciniak, the immigrant aliens go through a particular process of othering that consists of humiliation, branding ("pejorative discursive markings" [xiii]), instructions that the immigrant should be grateful and quiet (feminized, emasculated), and medical examinations of and intrusions into the body that contribute to the "process of becoming an officially sanctioned subject" (xiii). Like Marciniak's immigrants (who are labeled with the troublesome metaphoric "aliens"), Mary was instructed to remain quiet and underwent the corporeal intrusion of sterilization. But Mary's celebrity, her willingness to be interviewed by filmmakers, oral historians, and newspaper reporters indicates at least a willingness for her to expose her history (or to make her story known). Education and freedom of reproductive choice had been denied to her.



Yet, Mary resisted being silenced, and she participated in documenting her identity. Her activities and thoughts about her past as an adult do not reflect the one-dimensional representation of her in the commitment records or the representations of children like her in various media and records.

Mary's example and the history of this eminent domain case linked to human rights violations provide issues to consider for contemporary concerns of children's rights. The routine process of othering, as exemplified through the law and recognizing the other as responsible for her own exile, made the practices at the Colony possible. They became routine and unquestioned. The normalizing process of categorizing, which we as humans *routinely* do, made the way for children, especially poor children, to be easily seen as misfits and feeble-minded, and their parents responsible, while simultaneously blamed for their condition. The routine nature of this process of normalizing is a significant point to be made in this example. Our legal system makes systematic the power to categorize citizens so that then they might be excluded under the law. It is institutional, it is state law, and it is the very foundation of the U.S. Constitution, where displacement is presupposed in the very way the law is written (Ryan). Indeed, the coupling of eminent domain with racialized discourse began with the Indian Removal Act of 1830. We are historically and therefore routinely familiar with the process of othering, even if that process is less explicit. Consequently, when children like Mary and others like her were removed from the public eye, there was very little questioning of the abuse of her civil or human rights at the time of her institutionalization. Mary's vulnerability placed her outside the law, her commitment papers documented her as being out of order, which justified the state in abandoning her and not protecting her rights.

Children, particularly those represented as slovenly and poor, become the "excluded exclusions" and are constructed as responsible for their exclusion. This process works similarly for an other, as they are infantilized in various ways. As the commitment records reflect, local social workers, judges, doctors, and relatives participated in rendering poor children as "feeble-minded" in order to serve the so-called public "good" to "purify" the white race. Agamben's "states of exception" explains that states withdraw protections and entitlements from citizens



or citizenship altogether in perceived times of “crisis.” The Racial Integrity Act and the Eugenic Sterilization Act (emboldened through the pseudoscience of eugenics) explicitly provided the state the power to regulate bodies. While eminent domain law does not speak of “bodies” per se, it is clear that actual bodies are moved when relocated for public use or for the so-called public good. By removing bodily discourse from the legal discourse, it is seemingly neutral, less problematic, yet functions similarly. The history of labeling children as feeble-minded, and regulating their bodies in this way, has implications today for the ways that laws about children are enacted. This historical example and its connection to eminent domain law and human rights discourses resonates today as biotechnology advances in reproduction and genetics continue to have an impact on women’s bodies, and contemporary examples of urban development and public use projects continue to necessitate the removal of families from their homes.<sup>32</sup>

*Virginia Tech  
Blacksburg, Virginia*

### Notes

1. North Carolina has already voted in favor of reparations for similar action in that state. Virginia Delegate Patrick Hope is in the process of proposing similar measures.

2. The notion of the “will of adults” is explained by Guggenheim and is a concept I will return to later.

3. See Marouf Arif Hasian’s discussion of the historical origins of eugenics discourse in *The Rhetoric of Eugenics* and Swift’s “Sinister Science,” where she examines the rhetoric of the Human Betterment Foundation in California and its influence on Nazism.

4. Robert Via, a landowner in the boundaries of Shenandoah, brought a case against Virginia, citing the violation of his civil rights when his land was condemned, which the U.S. Supreme Court refused to review, essentially upholding Virginia’s decision.

5. Here I follow the lead of rhetorical scholar Hasian who states, “Tracing the ideographic components of myths and narratives allows us to see how a movement like eugenics can appear to provide answers to complex social questions for a variety of different audiences. We can begin to appreciate how women, African Americans, and other marginalized communities lost their reproductive rights in the name of “liberty,” “opportunity,” or “necessity” (10–





11). See also Winfield's *Eugenics and Education in America*.

6. Thompson discusses Justice Pierce Butler's dissent and argues that "the rhetoric of civic duty and contemporary eugenics were combined to produce a public policy justification" (128).

7. Lombardo, Currell and Cogdell, Black.

8. Agamben addresses this issue particularly through the notion of "refugees" and says that "The relation of the exception is the relation of the ban. He who has been banned is not, in fact, simply outside the law and made indifferent to it but rather abandoned by it, that is, exposed and threatened on the threshold in which life and law, outside and inside, becomes indistinguishable" (Agamben 29). In this way, there is no difference between bare life and political life, a point of contention for Hannah Arendt. When we categorize, which is ultimately violent, we routinely make the other abject simply by ordering, by categorizing, by violently representing. The only way we know the abject or disorder is through our compulsion to order and being in a power position to name what is acceptable, desirable, and normal.

9. Ryan, explaining Jacques Derrida's method of analysis, explains this paradoxical relationship between order and displacement with specific attention to the state's ability to forcibly take land from property owners. While Derrida does not use the word "displacement," his mode of analysis is described as analysis in Krupnick's collection.

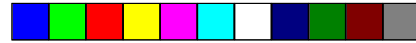
10. In this article, Guggenheim clarifies his arguments in "What's Wrong with Children's Rights." While he supports U.S. ratification of the U.N.'s Convention on the Rights of the Child, he spends this article explaining why doing so might not radically shift the ways that the U.S. enacts its own child protection laws.

11. See also "The Governmentality of 'Crisis' and its Resistances" in Butler and Athanasion.

12. See Lombardo, Currell and Cogdell, Fender, Black.

13. Eugenists feared that the feeble-minded (among others) were impacting the gene pool. Likewise, the eugenists in the early twentieth century were very concerned about refugees' impact on the gene pool. The editor of the *Journal of Heredity* wrote in 1920, "To talk of the sacred duty of offering asylum to any who choose to come, is to indulge in immoral sentimentality . . . it can only be concluded that the duty of the United States is to make itself strong, efficient, productive, and progressive." (qtd. in Maxwell 138).

14. In addition to funding Cold Springs Harbor, Rockefeller was a well-known philanthropist for the National Park Service and worked closely with Stephen Mather and Horace Albright in securing Acadia National Park and Grand Teton National Park, among others. Rockefeller "personally contributed \$160,000 to round out the purchase of land in Shenandoah National Park in Virginia" (Ernst 116).



15. See Currell's recent essay where she poignantly makes connections between the resettlement administration's practices and the eugenics movement. Her work, together with her collaborative work with Christina Cogdell, provide a more substantive discussion of the history of eugenics. Wolschke-Bulmahn also points out that Nazi "Landscape Planning" removed or murdered Polish residents from their homes for the "enjoyment and cultivation of the land by the proper German Volk" and for nature preserves.

16. See Green's historical accounts of the development of public welfare, particularly in the state of Virginia.

17. The United States' history in forced displacement served as precedent for the displacements that occurred as a result of Virginia's eminent domain law in the 1930s. From its earliest days with the American Indian Removal Act in 1830, the U.S. government justified its growth and expansion by removing American Indians from their ancestral lands. A century later, with President Roosevelt's Executive Order 9066 in 1942, the Japanese internments symbolized this country's continued fear of the other and forced removal to camps to assuage perceptions of threat to a particular way of life. While road expansions, public utilities, and economic and urban development might seem far removed from the more overtly racist instances of American Indian removal and Japanese internments, eminent domain cases, such as the 2005 *Susette Kelo v. New London, Connecticut* case, similarly addressed a perceived threat to a way of life. That is, economic gain for a community (through development by a private company) took precedent over an individual's ownership of a house. In this case, the U.S. Supreme Court upheld Connecticut's decision, citing the Court's reluctance to be in the business of deciding for states what constitutes the public good.

18. In fact, Lombardo argues that because the Racial Integrity Act received so much attention, the Eugenic Act passed relatively unnoticed (see Lombardo, "Medicine").

19. See *The Anguish of Displacement* where I analyze the content and narratives of displacement identity in the approximately 300-letter collection housed at the Shenandoah National Park Archives in Luray, Virginia.

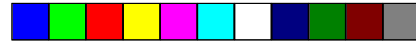
20. See *Answer at Once* for the full text of the letter and others like it.

21. The process of making the decision to remove all families is much more complicated than this account. For a more detailed account of the decision-making process among state and federal officials, see *The Anguish of Displacement*.

22. See [www.hsl.virginia.edu/historical/eugenics](http://www.hsl.virginia.edu/historical/eugenics) for a history of eugenics at the University of Virginia.

23. This conclusion can be made based on other surrounding images provided in the film and Sizer's documented relationship with the community.

24. See the photography of Farm Security Administration photographer Arthur Rothstein. Rothstein, whose work and its implications are the subject of



the documentary film, “Rothstein’s First Assignment,” was sent to photograph the Depression in the park and his photographs primarily consist of the Corbins and their children. As the filmmaker suggests, most of the photographs are of family members who ended up being sent to state hospitals, therefore linking the resettlement of the park with the eugenics movement. For instance, there are several images of children with “strabismus” or lazy eye, which at that time was thought to be an indicator of a mental condition.

25. See Brown, where she connects the history of moral, religious, and sexual attitudes toward private bodily practice as reflection of societal and cultural ideals.

26. The most famous case is documented in the Reeder’s book, where a mother willingly let her child be taken to the hospital to treat malnutrition, but the child was never returned.

27. This aspect of Mary’s experience, one that links sexual normativity with intellectual ability, suggests a need to examine these converging discourses through queer theories of normativity. As Clare states, “the disability rights movement has created a new model of disability, one that places emphasis on how the world treats disabled people: Disability, not defined by our bodies, but rather the material and social conditions of ableism” (360).

28. Portions of this interview appear in the documentary film, “Rothstein’s First Assignment.” For a description of the process of making the film and an interview with the filmmaker and musician, see my article in *Reflections*.

29. This notion of warehousing is one that is taken up in discussions of vulnerable populations of refugees. Child detention centers, supposedly under the auspices of the UN Conventions of the Right of the Child, are often places where abuse and neglect can occur when the state’s laws do not coincide with UN law. See Debi McLachlan’s “Refugees, Children’s Rights and Rhetoric.”

30. Indeed, keeping a group of people from having children is one the several proponents in the United Nations definition of genocide.

31. See Foucault’s *History of Sexuality*, which discusses power as the relation between “governors and the governed.” (142).

32. See Werneck’s discussion about contemporary reproductive rights issues and Hasian’s discussion about the implications of eugenics for the Human Genome Project.

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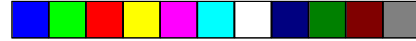
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