Anti-Poor State Practices in Disaster Preparedness: Contextualizing the Eviction of Vitas Tenement Housing Project in Metro Manila

Introduction

In the wake of the March 2011 earthquake, tsunami, and nuclear meltdown in Japan, the Philippine state and media were alit with a new urgency for disaster preparedness. While disaster has always been an embedded, even quotidian part of Philippine consciousness, the catastrophe in Japan prompted heightened state and media concern with earthquakes, namely, the looming, seismically due threat of “the Big One.” Anticipated to destroy up to 40% of the capital’s buildings and require the evacuation of three million, the devastation would be so extreme that local disaster authorities would simply not be able to cope. This vulnerability is worsened by fact that the metropolis houses 115,000 per square mile, making it the world’s most densely populated city. Overcrowded with poorly constructed buildings and plagued with hyper-congested traffic, an estimated 35,000 Manilenyos would die in such an event, suffering the decimating, human-produced consequences of the adage, “earthquakes don’t kill, buildings do.”

Within days after the disaster in Japan, the Philippine government began to reevaluate the safety of its school and residential buildings. Media outlets publicized the hundreds of tenuous structures classified by authorities as condemned. Of these, the Diosdado Macapagal Tenement Housing Project, also known as Vitas Tenement, in Metro Manila’s densest slum-city Tondo, was the subject of disproportionate attention. Framed as “blinded by nostalgia” and “belligerently hanging on to a place that had been their home for roughly two generations,” the residents’ activism and valid concerns
regarding rehabilitating as opposed to razing their building were cast aside by the
government’s thrust toward demolition for the suddenly urgent matter of residents’ safety.
By the years’ end, the government relocated the residents to a “shoddily made” housing
site distant from the city.\textsuperscript{11}

This paper seeks to contextualize and problematize the state’s eviction and
relocation of the roughly 600 families\textsuperscript{12} who lived in Vitas Tenement. My understanding
of the event is entrenched in the primary research conducted by in Marco Stefan B.
Lagman and Angelito S. Nunang,\textsuperscript{13} who have written the only academic material on the
settlement and its eviction. In light of troublingly similar evictions set to take place in Metro
Manila this year,\textsuperscript{1415} this paper aims to place of the eviction of the Vitas residents before
the backdrop of the city’s lengthy history of urban poor evictions and hostile state-urban
poor relations – which Lagman and Nunag’s paper does not do. The vulnerability of the
Vitas tenements, and their ultimate treatment in the eviction, were produced and informed
by longstanding anti-poor precedents. While the government’s concerns about the nature
of the threat to Vitas were entirely merited, a surface-level read of this story would
overlook the state’s negligence, its anti-poor histories, and the simple, tragic reality that
Metro Manila would never subject its richer residents to such haphazard treatment and
protracted oversight. To make this case, this paper outlines a history of Philippine state-urban poor relations, with a focus on housing and eviction policy, to show how the
vulnerability of the poor people in Metro Manila has been in large part produced by the
state. This is followed by the story of Vitas Tenement. Finally, the paper ties in Button and
Schuler’s concept of the translocality\textsuperscript{16} to build on their case that an increasingly
interconnected and warm world intensifies the vulnerability of poor people to disasters in
unique ways. I conclude by contemplating on how these phenomena of hostile state/poor relations and globalization have uniquely affected the vulnerability of the people of Vitas.

A Brief History of Philippine State-Urban Poor Relations and Forced Evictions in Metro Manila

It is imperative to understand the history of Philippine state-urban poor relations in order to make sense of the pattern of forced urban poor evictions in Metro Manila and thus the eviction in Vitas. In this section, I present scholars’ contesting visions of Philippine state-urban poor relations, which underpin my understanding of the history of urban poor evictions by the Philippine state. The paper interrogates this history to explain urban poor conceptions of the Philippine state and Philippine state conceptions of the urban poor. This is all covered so as to explain the ways in which state-urban poor relations in the Philippines have helped to produce the urban poor’s acute disaster vulnerability in Manila. By vulnerability, I mean “the characteristics of a person or group and their situation that influence their capacity to anticipate, cope with, resist, and recover” from disasters. An example of this would be how poor Manilenyos are constrained to live in hazardous areas like slums and shantytowns, leading to increased vulnerability to physical hazards in disaster and less financial capital to mitigate damages. In complex ways, “the cumulative and constraining effects of underdevelopment, chronic poverty… colonialism and antidemocratic development programs” increase a lower class’s collective vulnerability, and as I will argue now, have done so for Manila’s urban poor population.
Since independence from the United States in 1946, Metro Manila’s contentious relationship with poor people has been marked by “hostile state-poor relations, [bad] policy implementation and imbalanced development objectives.” Storey argues that these are a product of neopatrimonial state-society relations: a remnant of colonial patronage systems that rewards the elite over a large peasant class and has transformed into a state that, after independence, was kept weak vis-à-vis powerful elites. This “politics of survival” defines the nation; “accommodation[,] and control take precedence over change and development.” It is no surprise then that “bureaucratic mismanagement, politicization [and] corruption” have marred urban planning. Living standards for poor people have plunged as the nation has “developed,” as evinced by spikes in informal settlements and urban poverty. Today, a third of the 12 million in the capital reside in slums.

Kusaka however takes issue with this popular “passive victim” construction of state-poor relations:

Many studies on Philippine politics share the assumption that the poor have been subordinated by the country’s oligarchic local elite... state leaders... [create] ... social order, while the poor are relegated to a position in which they are subject to control by those actors or forces... this assumption is problematic because it ignores the agency of the poor in negotiating the dominant social order... In fact, squatters... have managed to acquire public land or elite-owned private land illegally and consequently exert a significant impact on the urban space and social order [ex. complex squatting economies]... Bayat... refers to this [resilience] as a “quiet encroachment” – a patient, persistent and penetrative assault on the state
and the elite by poor people determined to weather any hardships to achieve a better life.\textsuperscript{32}

On Kusaka’s read, Metro Manila’s four million slum-dwellers are not merely hapless victims of the bad state policy that failed to govern them, but are resilient agents acting against relentless movements against them. With these frameworks in mind, Metro Manila’s history of slum clearance becomes a dialectic of quotidian disaster and resilience-- a weak, ad hoc, patrimonial state and poor people’s resistance.

Since at least the mid-1960s, evictions of informal settlements have been a continual part of Metro Manila’s urban policy.\textsuperscript{33} Just three years after the creation of the Philippines’ first housing authority in 1947, the first Slum Clearance Committee was established. According to Storey, their \textit{balik pobinsya}\textsuperscript{34} initiative lacked cohesion and comprehension. Relocation sites were poorly constructed and “marginal to the metropolis (and therefore to employment, schools and services)” and thus often abandoned. Some families were expelled to the provinces and returned to the city as many as four times. Demolition and relocation policies heightened into sustained practice in the mid-1960s, but even these efforts “failed principally because of a lack of coordination, particularly with regard to the preparation of sites.”\textsuperscript{35}

The ensuing presidential regimes continued this pattern of slum eviction for the sake of urban development. The Marcos dictatorship conducted ad hoc demolitions and relocations (particularly against riverside and railroad dwellers), criminalized squatting, allowed authorities to fine residents of informal settlements, and set up red tape that prevented poor people’s equal participation in government aid programs.\textsuperscript{36} Under Aquino, the system of demolitions affected an average of 100,000 poor people per term, with “Quezon City\textsuperscript{37} alone issuing 100 court orders for official demolitions each year.”\textsuperscript{38} In
1992, President Ramos promised to “purge the country of the real causes of squatting.” His “Philippine 2000” program pursued the relocation of “164,000 people to sites outside Metro Manila [to develop] medium rise and rental complexes.” Across these initiatives, relocation sites were still often distant from the center and lacking in livelihood opportunities, a state practice that lacks cognizance of the fact that many of the rural poor moved to Manila seeking work in the first place. Much of the residents returned to the city, preferring blighted informal settlements if it meant survival for their families. These “neoliberal urban governance” agendas exemplify what Boris Michel calls “repressive revanchism,” a pushing out of the poor that has produced a class-partitioned Manila: part-cosmopolitan metropolis, part-mass slums. This “long history and exceptional intensity of privatization in urban and regional planning” shapes the infamous, “extremely uneven distribution of wealth and access to the city.”

At the backdrop of these evictions lies an entangled history of overlapping, floundering, uncoordinated housing administrations, coexisting and collapsing in bankruptcy. The goals of these housing administrations are put at odds by the inherent conflict between the need to turn a profit and the goal of providing cheap housing for the urban poor. This has led to an overproduction of units affordable only to middle classes. Despite stated grand aims, like Aquino’s bold estimate of aiding 400,000 squatters in her term alone, state housing policy has by and large failed to house the urban poor. The handful of state housing projects in Tondo, where Vitas is located, dot the landscape “at varying stages of blight and decay… [symbolizing] the government’s failed promise to address the issue of poverty and provide decent shelter to its citizens.” To them, these piecemeal, now rundown solutions to shantytowns reveal the state’s interventions as
“merely strategic and politically expedient,” an attempt to make Tondo a poster child of its good graces. The buildings’ neglect and hazardousness make visible the incongruity between the state’s purported aim to protect its citizens from the precarity of the slum and the unique, ironic precarity of a public housing facility neglected into squalor.

For Storey, this tradition is “reflective of the low importance attached [by the state] to the urban poor.” Given this history of state eviction of the poor and failure to follow through on its promises, it is unsurprising that some poor Manilenyos today think the “heartless “rich” [seek to] deny the livelihoods and dignity of the “poor” and… expel them from the city.” For many, “the government has lost credibility, particularly when it comes to promises regarding relocation.” Law enforcement is viewed as inherently unequal, favoring the wealthy. Researching recent Metro Manila slum evictions and a ban on street vending, ethnographer Kusaka writes in 2017, “to poor people who think of themselves as living with pride despite their poverty, [the state’s] forced evictions in the name of law and order are… patently unjust… the ad-hoc social relations of the squats and streets have evolved toward solidarity in the face of threats from capitalists and the state, a solidarity grounded in the moral conviction that no one should be denied their livelihood or dignity.”

While by no means are urban poor people in Manila a monolith in moral grammar or contentions with the state, these perceptions cast light on a historically fraught relationship between the groups.

Storey describes the attitude of authorities towards the poor as a kind of “embattled… conflict mentality.” An example at his time of writing quotes a state engineer who refused to allow informal settlers their legally protected thirty-day eviction notice: “It’s war. In war you don’t warn your enemies.” The 2006 Metro Gwapo

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beautification campaign under Arroyo, which sought to rid the city of street vendors and slums, as studied by Kusaka and Boris, revealed key problematics in perceptions of the poor. Media and state discourse framed poor people as eyesores, nuisances, inhibitors of development, street-crowders (and thus the source of the city’s traffic problem), “destroyers of [law] and order”\textsuperscript{56}, vested in annexing land from deserving citizens though informal settling agendas,\textsuperscript{57} and ignorant subjects who do not know what they need and require state discipline. Viewed as a space of “deviance, underdevelopment, and a passive culture of poverty,” the slum then deserves the “wide range of repressive strategies unleashed against informality.”\textsuperscript{58} Garrido traces this resentment back to a sense of righteousness over who gets to own the precious, slippery resource of urban land.\textsuperscript{59}

What these criminalizing perceptions of the poor overlook is the city’s dependence on poor people as the crux of the city economy, the “cheap labor power [who at] the same time [are] needed to maintain, secure, and clean” those spaces they are banned, priced out, and expelled from.\textsuperscript{60,61} It neglects the longstanding anti-poor neoliberal state agendas\textsuperscript{62} that have in large part been responsible for the city’s inequities and exacerbated vulnerabilities of poor people. Fundamentally, this rhetoric dehumanizes, privileging the rich’s right to land and life in the capital, vilifying survival strategies of poor people, dispossessioning them from the city so they become somebody else’s problem. “[W]e are being tossed out like so much garbage,” commented Elma, a street vendor targeted by \textit{Metro Gwapo}, “without being given another place to go.”\textsuperscript{63} The resilience of poor communities to continue to carve out space for themselves in a city set on segregating, punishing, and expelling them cannot be understated.\textsuperscript{64}
This history reveals how the state has produced much of the vulnerability of poor Manilenyos today. The context lays bare the irony and urgent necessity that a state so integral in producing such disaster vulnerability should now try to remedy it. Segregated to precarious proliferating shantytowns and housing projects in disrepair, Metro Manila’s poor are acutely vulnerable to flooding, earthquake, typhoon, and other natural hazards. Having less financial and political capital, a condition exacerbated by evictions and failed housing policy, and crowded into dense slums, poor Manilenyos are less prepared for disaster, although plenty desire to do so but simply lack the resources.

The Case of Vitas Tenement Housing Project

Urbanization in the 1960s and concurrent proliferation of slums in Manila raised concerns within the Diosdado Macapagal Administration. To provide affordable alternatives to the urban poor, the state funded the construction of public housing projects that would tackle the “substandard conditions of the masses” as a part of a greater initiative to “eliminate slums in the country’s urban areas.” Among the four built was Vitas Tenement, completed in 1965, in the city of Tondo. By 1968, it housed over 200 low-income families. The intentions of the project “to equitably redistribute the resources of the state and provide a much needed subsidy to its more marginalized citizens” at first seemed likely to be fulfilled. However, due to legal hurdles, internal conflict within the community, and an unfortunate failure to organize as a single entity to “sign pertinent documents and agreements as a unified group,” the community was unable to secure collective ownership of the land. What resulted was partial unit ownership, partial rental
agreements with the housing association (with the land itself still legally government property), and burgeoning informal settlements in and around the tenement. This arrangement continued for some twenty years, without major indications of dissatisfaction among residents since the tenure in their respective homes appeared fixed as long as they paid rent, a sense of stability that made organizing as a collective fade in priority.

In 1990, an earthquake in Luzon killed over a thousand people and decimated buildings across the northern part of the island. Despite Metro Manila experiencing no intensive structural damage or casualties from the quake, Vitas suffered: “portions of concrete began to fall off from their building’s beams and ceilings, significant cracks began to appear on the walls of individual units and corridors, and iron bars that used to be hidden underneath cemented walls, beams and ceilings soon became exposed.” The National Housing Authority (NHA) and the Department of Public Works and Highways (DPWH) conducted an ocular inspection of the building to assess the damages. In spite of the City Government of Manila’s and dissenting residents’ requests for housing authorities to first consider the building for rehabilitation, it was deemed structurally unsafe and condemned. Lessees were given the news that they had to vacate the home some had been living in for two decades. The NHA promptly halted monthly rent collection and maintenance in the building. No relocation site was offered to residents until two decades later in 2010: a distant housing site in San Jose del Monte in Bulacan.

After government oversight of the building stopped, the resident population swelled to an estimated 600 families from its original 200. Vitas burgeoned into a small squatting economy not unlike the shantytowns that surrounded it – reminiscent of Kusaka’s comment on the poor’s assault on the state to stake claim on space. Given urban land is
so scarce and prohibited to the poor, what but illicit means, might he argue, do much of the poor have to carve out space for themselves in the city? Yet without NHA regulation “the building started to take on the characteristics of the blighted informal settlements that tenement structures such as these were supposed to replace.” This mirrors Storey’s characterization of ad hoc housing policy for the poor in Metro Manila: marred by “continual gaps between stated goals and actual implementation.” The NHA also kept in tradition with Metro Manila’s historically floundering housing policy by being “unresponsive to the needs and priorities of the urban poor” via reliance on ocular as opposed to more substantial structural testing to address resident concerns toward building rehabilitation and an abandonment of the facility to decay.

Although condemned to demolition, authorities never followed through on their threats of eviction. According to community organizer Ka Roger, tenement dwellers sustained their lives in the damaged structure “because [it was] the only home that they [knew] and they [did] not have the financial means to transfer to safer residences.” Some cited the 1992 law that held that informal settlers “who have already established residence in their current place of occupancy on or before 1992 can only be evicted from their current residence if a suitable place of resettlement is provided for them.” What’s more, members of the Mamayang ang Kayunin ay Seguridad at Kabuithan na Inaasam sa Tahanan or MALASAKIT, a community organization made by Vitas dwellers, alleged their right to the land was strengthened by the legal documentation from the 60s and 70s that affirmed the governments’ intentions of transferring the land rights to them. In addition, they were “yet to be fully convinced… regarding the real structural condition of their
They believed Vitas was prematurely condemned to destruction, calling for structural testing to reconsider rehabilitation.

In the early 2000s, the NHA revamped talks on “repair” and “rehabilitation” for the building. This initiative merited two rounds of structural testing by authorities to see if the tenement could possibly be rehabilitated, swelling the community’s hope for retrofitting Vitas. Unfortunately for the residents, the results decried that residents should be temporarily relocated “in preparation for a more permanent relocation to a safer environment.” Yet the state failed to relay the life-concerning results of said inspection to the residents until almost two years after the fact. By this time, the findings “lost legitimacy,” appearing “highly unusual and suspicious” to community members because of the communication delay. Their lack of proper representation in the testing process, and that the building continued to stand apparently unfettered, made it difficult to accept the results. The skepticism of the residents is also important to understand in the context of the history of negligence by the NHA and broader state-urban poor relations in the city, where the state is perceived as lacking a moral authority or honest integrity given its reputation for corruption, indolence, and violence. MALASAKIT eventually called for a final, conclusive “hammer or bar locator test,” a demand that was never met. This lack of engagement with the needs of the residents reflects both the state’s historic low prioritization of poor people’s concerns and the perception that they do not know what is best for them. This ignores the reality that the residents of Vitas were those most familiar with their own building and that, as the subjects of an intervention that intends to help them, they deserve to participate and be promptly informed in matters that shape their very lives.
In 2010, the state proposed a relocation site to residents in Bulacan, some 25km away. Many of those who took the state’s invitation to visit the replacement houses protested that “aside from being located far from their current places of work, [the homes were] too small and shoddily made, [making] them believe that they would be better off staying” in Vitas.\(^8^1\) This is strikingly similar to historic patterns of evictions of informal settlers outlined earlier. Barangay\(^8^2\) Captain Setenta alleged:

> There is no potable water in the vicinity, [since] water is only coming from a deep well… the land… could be prone to landslide[s] and liquefaction… [there is] foul odor coming from a nearby piggery… [there is a] lack of school and health facilities and [scarce] livelihood opportunities.\(^8^3\)

These precarious alternative raises the real concern that while the state is addressing some of the vulnerabilities of the people of Vitas, it is also producing new ones. Although done with the valuable intention of improving the safety of the residents from disaster (thus marking a departure from the historic pattern of the urban poor eviction, where the goal is usually urban development), this solution fails to consider those aspects of the residents’ lives that provide day-to-day safeties, such as access to work and education, from day-to-day disasters. The yawning gap between stated intentions for resident safety and actual implementation reveals the unfortunate similarity between the eviction of the Vitas residents and the anti-poor slum clearance traditions that preceded it.

In a doomed effort to salvage their tenement, MALASKIT leveraged the few political connections it had to lobby for a congressional inquiry on their concerns.\(^8^4\) However, these attempts were dismissed when Philippine shock at the tragic disaster that struck Japan on March 11, 2011 “delivered the final nail on the coffin to the predicament of the Vitas residents.” The “utmost concern” of the state reduced their real, pertinent and
pressing issues as inconsequential.” The “condemned” status of Vitas “gave the impression that the threat of its collapsing once an earthquake affected Manila was indeed a very real one, as reflected by the media mileage it received.”

Lagman and Nunang reflect on the “fatal” matter of the decision from both sides:

> From the vantage point of the hapless residents, the very reason of the government is also the very reason of their contention. Their solution offered to them, in essence, deprives them of their lives. In the relocation site, they are dispossessed of basic services and removed from their livelihood. It is tantamount to saying that they are being killed just the same; such is also the very same concern of the government should an earthquake occur while they reside in the tenement.

For the state, “safety” is the question of residents’ life/death; for residents, the issue of social death – the death of their livelihoods – takes first priority.

Residents did everything to stall their dispossession: “people’s organizations sprouted and spearheaded [rights] campaigns”; there were “dialogues and [petition initiatives]”; some simply refused to go. But by August 2011, after a 26-day voluntary relocation process, the NHA resettled 570 Vitas families. No data could be found online at the time of writing on the current situation of the residents. What is noteworthy is that in October 2013 a groundbreaking ceremony took place for a replacement tenement for Vitas, called the “New Vitas Low Rise Buildings.” It is purportedly available for residents who wish to return. However, it is unclear as to whether or not there would be enough space; the NHA evicted 570 families from Vitas and New Vitas holds only 240 units.

Conclusion
For Button and Schuler, disasters are translocal. That is, they are deeply interconnected: always "grounded in a larger social, political, historical and spatial context that often reflects the historical processes that surround the economic and political processes of both the nation-state and the global economy." For example, disasters are translocal across space: a disaster in Japan, by way of highly effective/affective globalized media, shocked a government in the Philippines into axing a housing project for the sake of disaster preparedness, irreversibly altering the lives of a disenfranchised community. In this way, disasters spiral; they are "connected across various social fault lines."\(^90\) If we expand our definition of disaster to think of the eviction of Vitas itself as a kind of disaster, or even a slow-motion disaster, we can see how the disaster was also translocal across time: its handling was instructed by the long history of evictions and anti-poor, negligent state culture in Metro Manila. This lens of interconnectedness that I have tried to take in this paper calls us to recognize those "everyday disasters, which… disclose the larger processual contexts in which many disasters evolve in both space and time."\(^91\) Instead of buying into the media’s framing of the event as one of the truculent poor’s naïve refusal to leave a hazardous housing project, the narrative complexifies when contextualized: why was the project not built earthquake-resistant in the first place? Why is the building being bulldozed now? What histories make the residents so dissident? In light of the controversial news of the impending evictions of three housing projects in Manila for the sake of disaster preparedness (one of which is also named Vitas!\(^92\)) to distant housing sites, this story makes urgent the need to understand how longstanding anti-poor state sentiment and policy shape even well-intended interventions. Only through a willingness to wrestle with interconnected vulnerabilities across time and space,
nuanced hegemonic histories, and constructed myths of otherness can those harmful practices be named and changed. This process is essential if, in its necessary efforts to prepare for “the Big One”, Metro Manila intends to do right by those communities of people it is trying to keep safe.

Word Count: 5,500
Notes


2 See, for instance, Porio, page 79; ASEAN Earthquake Information Center; Asian Disaster Reduction Center.

3 See, for instance, Makilan of Bulatlat.

4 Rappler, “How prepared is Manila for a strong quake?” last modified November 21, 2013.


6 Manila competes with Dhaka as the most densely populated city in the world. See Cox.

7 Makilan, “Big One’ Is Possible But Metro Is Unprepared.”

8 Lagman and Nunang, 182.

9 According to the Philippine Statistics Authority, Tondo has a population density of 190,000/sq. mile.

10 Lagman and Nunang, 182

11 ibid., 191 – 192.

12 ibid., 188.

13 ibid.


17 Because of the scope of this paper, pre-independence and colonial state-urban poor relationships are not discussed.


19 ibid., 123.

20 ibid., 124.


22 ibid., 269

23 ibid., 272.

24 ibid., 271.

25 ibid., 273.

26 ibid., 268.

27 ibid., 273.

28 Cox, "The Evolving Urban Form: Manila."

29 For a detailed history of housing the urban poor in Metro Manila, see Storey.


32 Kusaka, 157 - 158.

33 Boris, Michel, "Going Global, Veiling the Poor Global City Imaginaries in Metro Manila." *Philippine Studies*, vol. 58, no. 3 (2010): 392.

34 Tagalog for "return to the provinces."

35 Storey, 278.

36 ibid., 276.

37 Quezon City is one of the 16 component cities of Metro Manila.

38 Storey, 281.

39 ibid., 283.
40 Porio, 100.
41 Boris, 387.
42 ibid., 388.
43 Storey, 280.
44 ibid., 279.
45 ibid., 273 – 274.
46 Lagman and Nunang, 184.
47 Boris, 284.
48 Kusaka, 180.
49 Storey, 283.
50 Kusaka, 179.
51 Kusaka, 180.
52 Storey, 283.
53 qtd. in ibid., 283
54 Boris, 394.
55 Kasaka, 163.
56 ibid., 168.
57 ibid., 170.
58 Boris, 387.
59 Garrido, 1349.
60 Boris, 401.
61 See Garrido.
62 See Boris.
63 qtd. in Kusaka, 180.
64 See Kusaka.
65 See Porio.
66 Porio, 89.
67 Lagman and Nunang, 183.
See Celdran in Al-Jazeera.

Lagman and Nunang, 184.

ibid, 185 – 186.

ibid, 184.

ibid., 186.

ibid., 187.

ibid., 188.

Storey, 268.

ibid., 285.

Lagman and Nunang, 188.

ibid., 188.

Lagman and Nunang, 189.

ibid., 190.

ibid., 191.

A barangay is the smallest unit of administration in Philippine governance.

qtd. in ibid., 191 – 192.

ibid., 192 – 193.

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