Freedom City Working Paper

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Executive Summary

The United States has not founded a major newly built city since Irvine, California, was incorporated in 1971 — over half a century ago.[2] In the decades since, the national housing shortage has grown to 4-8 million homes by various estimates, while many existing cities, having failed to keep pace with rising demand, are unaffordable. Zoning constraints, permitting delays, and high costs imposed by regulation have left little room for balancing supply with demand. We propose a bold alternative: Freedom Cities—new municipalities built by private developers over a 5-25 year time horizon on appropriately identified and suitable federal land – in the American West, designed to offer abundant housing, economic opportunity, and a fresh start.

This paper focuses on federal land managed by the Bureau of Land Management (BLM). The BLM manages 24% (269,000 square miles) of all land across Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, and Wyoming (Ten Western States). Of those, eight have ranked among the top twelve U.S. states in home price appreciation over the past decade. In addition, the BLM manages large swaths of land where the highest and best use would be for the development of new communities.

In order to maximize the probability that Freedom Cities succeed in creating thriving and affordable communities, we propose a simple set of policy suggestions. These recommendations exist to ensure that Freedom Cities fulfill the promise of their name—offering a free environment that promotes enterprise, growth, and naturally inclusive communities for Americans seeking opportunity.

Freedom Cities are proposed on BLM land that meets the following criteria:

- Composed of between 10 and 100 square miles of developable land.
- Created from contiguous land, excluding mountainous or steeply sloped areas.
- Has at least 2 square miles of high-quality water within 10 miles of its borders.

To ensure their success, Freedom Cities should adhere to the following principles:

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[1] The authors thank Andrew Crouch, AEI Housing Center data analyst for his dedicated research assistance.

[2] Several are underway, including Teravalis, AZ and Summerlin, NV.

- **Freedom zoning**: Land-use rules should secure broad property rights for building homes and businesses at market-determined densities, allow mixed residential and commercial uses, rely on simple performance standards (e.g., health, safety, and nuisance limits), and avoid the large-lot, single-use mandates that drive sprawl.
- **Market-driven development**: Sequencing of projects, mix of uses, and intensity of building should follow price signals and consumer demand, with limited prescriptive mandates and minimal subsidies or quotas that distort supply.
- **Minimized bureaucratic discretion**: Governance should emphasize clear, objective, and digital permitting with firm shot clocks, limited discretionary review, open procurement and conflict-of-interest rules, and routine audits, reducing opportunities for favoritism and delay.
- **Incorporation**: Freedom Cities should incorporate as municipalities so they can exercise core authorities—zoning, policing, taxation, contracting, and infrastructure finance—needed to adopt and enforce the policies that will allow them to work.

Finally, we aim to locate Freedom Cities in the best positions to succeed immediately, highlighting two for each state.

Freedom Cities should meet the following initial criteria:

- Within a Core-Based Statistical Area (metro) with high demand (absorption capacity) for housing.
- Near major job centers.
- Near a medium to large municipality.
- High housing pressure (metro median home price/metro median income)

Our list of twenty Freedom City sites (two from each of 10 states) best meeting these criteria.

Top two freedom cities in each of the Ten Western States (by overall rank)				
Metro (CBSA)	Potential Homes	Metro Price/Income	Jobs within 10 Miles	Square Miles
Bend, OR	34,458	7.48	63,270	13.1
Bend, OR	67,864	7.48	60,685	25.8
Lake Havasu City-Kingman, AZ	33,669	7.13	65,511	12.8
Riverside-San Bernardino-Ontario, CA	43,139	6.69	7,636	16.4
St. George, UT	33,932	7.18	54,450	12.9
Lake Havasu City-Kingman, AZ	64,182	7.13	43,948	24.4
Riverside-San Bernardino-Ontario, CA	82,332	6.69	9,555	31.3
Reno, NV	97,325	6.51	18,751	37.0
St. George, UT	43,928	7.18	9,428	16.7
Las Vegas-Henderson-North Las Vegas, NV	49,715	5.98	18,942	18.9
Rexburg, ID	27,882	7.43	22,358	10.6
Boise City, ID	36,036	5.91	20,998	13.7

Grand Junction, CO	208,591	5.63	62,735	79.3
Grand Junction, CO	171,765	5.63	12,388	65.3
Las Cruces, NM	56,817	4.76	64,843	21.6
Las Cruces, NM	60,762	4.76	58,759	23.1
Billings, MT	56,291	5.17	2,000	21.4
Billings, MT	91,801	5.17	564	34.9
Cody, WY	86,277	6.21	7,912	32.8
Cody, WY	30,513	6.21	7,714	11.6

The Case for Freedom Cities

BLM manages 269,000 square miles of land in Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Utah, and Wyoming (Ten Western States). We document among this land 520 square miles, less than 0.1% of federal land, which would be suitable for twenty freedom cities. Furthermore, the sale of such land is consistent with BLM's founding document, The Federal Land Policy and Management Act of 1976 (FLPMA).

BLM is permitted to sell land that "will serve important public objectives, *including but not limited to, expansion of communities and economic development*, which cannot be achieved prudently or feasibly on land other than public land and which outweigh other public objectives and values, including, but not limited to, recreation and scenic values, which would be served by maintaining such tract in Federal ownership."[i] [emphasis added]

There is a consensus among scholars and policymakers across the political spectrum that:

1. The United States has a shortage of housing
2. Home prices have risen over the past decade
3. Increasing the supply of housing helps slow home price and rent growth, making homes more attainable.
4. U.S. cities have contributed to the housing shortage through rigid zoning regulation.[ii]

Given the existence of a housing shortage in the United States, it is clear that the privatization of current BLM land on which housing could be built would serve the important public objectives of the expansion of communities and economic development. Given that FLPMA specifies that such objectives are not limited to those explicitly listed, this is more than sufficient to justify the sale. However, given the persistent failure of existing cities to accommodate growth—due to regulatory barriers, land constraints, and escalating costs—it can be argued that new urban development cannot be achieved prudently or feasibly on non-federal land alone.

Further, as shown in Appendix 2, BLM land use restrictions act as a de facto growth boundary for housing development in several high-demand metros,, blocking expansion where demand is highest. Freedom Cities offer a purposeful path for the federal government to remove these bottlenecks and directly fulfill FLPMA's mandate to prioritize the public good and economic growth—especially where development can be shown to outweigh other land management objectives.

The U.S. Housing Shortage

The Ten Western States comprise roughly half of the United States' housing shortage of 6 million units (2.9 million).[iii] Further, there is evidence that the shortage is worsening. From 2012 through 2022, household formations outpaced housing starts by 2.3 million, with 15.6 million household formations to 13.3 housing unit starts.[iv] This gap suggests that at current levels of new housing construction, it would take years of above-trend building just to catch up—let alone accommodate future growth.

Rising home prices

While home price appreciation has declined since its peak of 24 percent in 2022, the corresponding increase in mortgage rates has led to rapidly increasing costs for many borrowers. This increase in prices has been especially pronounced in the Ten Western States. Eight of the ten states with the fastest-growing home prices in the past decade are within the Ten Western States. For example, in Idaho, home prices rose 200 percent on a constant-quality basis from 2012 to 2023. On average, the ten states grew by 164%, compared to 123% nationwide.[v]

The effect of supply on prices (filtering)

Like all economic goods, housing is subject to supply and demand. As household formation has outpaced new construction, a growing imbalance has driven prices higher. One of the clearest ways to moderate price growth is to expand supply—especially at and above the median price point—where new housing triggers what economists call filtering. Filtering is the process by which newly built homes are occupied by higher-income households, who vacate older units, which in turn become available to middle- and lower-income households. Over time, this process creates naturally occurring affordable housing without requiring subsidies. When supply is abundant, filtering operates smoothly, increasing affordability across the housing market.

Empirical evidence supports this mechanism. AEI Housing Center research finds that filtering operates effectively in markets with high rates of new construction, enabling housing to become more affordable over time without the need for subsidies.[vi] For instance, Mast (2023) tracked chains of moves triggered by new construction and found that by the sixth move, 40% of households ended up in lower-income neighborhoods.[vii] Other studies, including Liu et al. (2022), show that metros with greater housing supply elasticity exhibit stronger filtering dynamics and improved affordability.[viii] By facilitating large-scale, market-driven development on public land, Freedom Cities would activate these same filtering effects—making homes more attainable across income levels by simply allowing more of them to be built.

Urban Land-Use Constraints and Underproduction in Existing Cities

In many metro areas, local land-use regulations and lengthy development processes have prevented housing supply from keeping up with demand. Zoning laws often mandate large lot sizes, strict height limits, single-family only neighborhoods, and excessive parking requirements – all of which limit the number of new homes that can be built even as demand grows.

These regulatory barriers are frequently compounded by protracted permitting and approval timelines. For example, environmental reviews, public hearings, and other procedures can stretch for years; in San Francisco, a particularly extreme case, the typical wait for a housing project permit is well over a year (approximately 626 days on average as of recent estimates) before construction can even begin. Such delays and uncertainty raise development costs substantially. Additionally, many jurisdictions levy hefty impact fees and exactions on new housing. California is a case in point: development charges there can exceed $150,000 per single-family home in some communities (not including utility hookup costs), a burden that is ultimately reflected in home prices or deters projects altogether.[ix]

New communities built after 1950

While the United States has largely abandoned the incorporation of large parcels capable of being developed into newly built cities, it has continued to develop new communities to relieve metropolitan pressures. Reston, Virginia, founded in 1964, pioneered a "village" model—organizing neighborhoods into clusters of townhouses, apartments, and single-family homes with their own trails, pools, and community centers. Columbia, Maryland, launched in 1967, assembled 14,000 acres into a planned community of ten villages with schools, shopping, and parks woven into preserved stream valleys. Irvine, California, incorporated in 1971, benefitted from unified ownership of the Irvine Ranch and the early siting of a University of California campus, giving it both an anchor institution and a comprehensive private master plan. The Woodlands, Texas, opened in 1974 with federal loan guarantees but endured only because George Mitchell paired that federal support with patient private capital and a prime location on Houston's growth corridor. Highlands Ranch, Colorado, beginning in 1981, grew rapidly without federal assistance, financed privately by the Mission Viejo Company and later Shea Homes, and today houses more than 100,000 residents.

Not all new towns survived. Under the Urban Growth and New Community Development Act of 1970 (Title VII), the Department of Housing and Urban Development guaranteed loans for thirteen planned towns. Projects such as Soul City, North Carolina, and Jonathan, Minnesota collapsed when federal backing ended, leaving half-built subdivisions and unpaid debts. The Woodlands was the rare exception, because Mitchell could carry losses during lean years and ultimately allow the market to shape what was built. The contrast illustrates a recurring pattern: when entire cities were predicated on subsidies or federal social policy goals, they faltered; when they aligned with consumer demand and private investment, they endured.

The lasting successes demonstrate what drives viability. Irvine thrived because the Irvine Company controlled land at scale (the original Irvine Ranch), partnered with the state to site UC Irvine, and let market demand guide the mix of housing and jobs. The Woodlands prospered once federal affordability mandates loosened and the market could shape its growth, becoming a regional employment hub in the process. Highlands Ranch grew rapidly without federal aid at all, financed privately and sustained by Denver's suburban expansion. Reston and Columbia, while pioneering in design, stabilized only after large corporate investors or county governments provided continuity. Taken together, these examples show that new cities are most durable when private enterprise leads, when competitive markets determine what is built, and when governance structures secure property rights while avoiding bureaucratic barriers. Freedom Cities, if they are to succeed, must follow this proven formula—placing land into private hands, enabling flexible development, and ensuring institutions support growth rather

than constrain it. To the extent the federal government assists in their development, this assistance should be done immediately, and limited to infrastructure.

Data

The analysis in this paper draws upon a variety of geospatial datasets that describe the physical, environmental, and infrastructural characteristics of land managed by the Bureau of Land Management (BLM). Our primary unit of analysis is the BLM Public Land Survey System (PLSS) grid, which divides federally managed lands into standardized parcels with a median area of 0.06 square miles (40 acres). These data provide the foundational spatial framework for identifying candidate areas for Freedom Cities.[x]

To assess topographic suitability, we incorporate elevation and slope data at the parcel level. Slope is derived from the USGS National Elevation Dataset at one arc-second (30 square meters).[xi] The slope of a parcel is calculated via the spatially-weighted average of its internal slope values. Parcels with an average slope exceeding 8.5 degrees (15 percent) are considered not developable, due to the engineering challenges and increased costs associated with development on steep terrain. Following Saiz (2010), this threshold reflects physical barriers to housing development.[xii]

Hydrological features were incorporated from the National Hydrography Dataset (NHD) and additional wetlands data sourced from the USGS.[xiii] To qualify, parcels must lie within ten miles of at least two square miles of high-quality perennial water bodies.[xiv] While Freedom Cities may contain perennial water bodies as an amenity, any parcel that overlaps substantially with a water body or swamp is excluded from eligibility.[xv]

Conservation land data were sourced from the BLM's Protected Areas Database.[xvi] Parcels overlapping with designated Areas of Critical Environmental Concern, national monuments, or other conservation lands were excluded if more than ten percent of the parcel area was within these designations. This ensures that proposed Freedom Cities do not compromise environmental protection goals or violate existing land management mandates.

With this data, a BLM parcel is considered “developable” if it has an average slope of less than 8.5 degrees, does not overlap with a water body, and does not have an overlap of at least 10 percent with conservation land.

Transportation infrastructure was incorporated to evaluate accessibility. Parcels were assessed for their distance to major highways and commercial airports. Candidate areas were limited to those wholly within ten miles of a major highway (a road with a speed limit of at least 50 miles per hour) and fifty miles of an airport.[xvii]

Methodology

Creation of Freedom Cities

We delineated candidate Freedom Cities through a multi-step geospatial analysis of BLM land. The process was designed to identify contiguous areas of land that meet the physical, environmental, and infrastructural criteria necessary to support new large-scale urban development.

Step 1: Identification of Eligible Parcels
We began by evaluating the BLM (PLSS), which subdivides federal lands into parcels of approximately 0.06 square miles (40 acres). BLM parcels were considered eligible if they met the following conditions:

- A slope of less than 8.5 degrees
- Not part of a swamp
- Less than 10 percent of parcel area overlapping with conservation lands
- Within 10 miles of a major highway
- Within 50 miles of an airport
- Not within the boundaries of a municipality
- Located within an existing core-based statistical area (metro)

The BLM land disposal should also consider issues outside of the scope of this analysis, including but not limited to: active rights (grazing, mining, or rights of way), natural resources important to national security, and environmental hazards that would prohibit residence.

Step 2: Formation of Initial City Boundaries
Eligible parcels were spatially unified into contiguous areas (polygons), within the parcel's subject county. From these initial polygons, we filter out spurious connections by removing narrow links (often artifacts of adjacency) using a reverse buffer technique. This approach shrinks each polygon slightly (0.5 miles) to eliminate thin connectors, then re-expands it to its original size, preserving only the main contiguous landforms while discarding slivers and artificial bridges.

Step 3: Splitting Large Polygons
Some resulting polygons are extremely large, greater than 400 square miles. To preserve urban scale and manageability, large polygons exceeding 100 square miles – or 40 square miles in smaller states (Idaho, Montana, New Mexico, and Wyoming, each with fewer than one million households) – were subdivided using a grid-based approach. This method calculated the number of grid cells needed to keep each resulting subarea under the size threshold. A square grid was constructed over each large polygon, splitting it into sections. This ensured that each subdivided area remained spatially coherent and suitable for urban development, and allows for prioritizing the section closest to economic opportunity.

At the conclusion of this process, Freedom Cities are those polygons with at least 10 square miles of developable parcels. We further document the potential for spatial expansion that may have been discarded through the splitting of large polygons.

Housing Estimates

Freedom Cities will be large and complex economies of their own, and it is impossible to predict exactly what types of markets, jobs, and communities will develop within them. We do not aim here to make predictions on their exact outcomes, but rather to make conservative estimates of what outcomes for

Freedom Cities could be given reasonable assumptions and liberal (permissive) governance. Consistent with this ethos, we estimate that the Freedom Cities will take 25 years to reach buildout capacity.

To estimate the housing capacity of Freedom Cities, we use a baseline assumption of 13.7 homes per acre, with 30 percent of developable land dedicated to residential use.[xviii] This figure derives from observed as-built densities in Clark County, Nevada, where development adjacent to Bureau of Land Management parcels shows how modest changes in lot size translate directly into supply and affordability gains. In these neighborhoods, increasing density from the observed mean of 10.5 to 13.7 homes per acre yielded roughly 30 percent more units on the same amount of land, while reducing home values by about 10 percent due to smaller lots and house sizes. At this density, an 80/20 split of single-family detached and attached results in single-family detached homes on lots of 3,660 square feet and attached homes on 2,050 square feet.[xix] This is a conservative estimate in that it does not include the construction of denser multifamily structures.

Research into housing across the United States consistently finds that smaller lots are essential to housing affordability in both the home ownership and rental market for housing. Freedom Cities, in order to serve their new populations, and to fulfill their housing potential, will need to allow multiple types of housing for families and individuals to purchase and rent, by-right. The result of by-right housing is that many more households can afford newly built homes, while the broader market benefits from the filtering process as existing homeowners move up. 13.7 homes per acre provides a conservative, empirically grounded benchmark for estimating the scale of housing production possible within Freedom Cities.

To assess the financial implications of Freedom City development, we begin with the median Automated Valuation Model (AVM) for single-family homes within the metro of the subject Freedom City.[xx] As of December 2024, these metros had median AVMs ranging from $340,000 in Albuquerque to 640,000 in Bend. We estimate the value of homes in new Freedom Cities to be, on average, 80 percent of the metro median. This accounts for both their not being at the center of the metro and for the relatively high density lowering per-unit prices (see above).

Practical considerations

A full review of the process of building Freedom Cities is outside of the scope of this paper, but we will briefly address two common concerns: water access and short-term growth. Each top-twenty site lies within six miles of an incorporated municipality, making near-term service connections and mutual aid plausible. The siting screen also requires proximity to high-quality perennial water – at least two square miles within ten miles – so the question is less access than management. In arid metros, conservation and reuse do most of the work: indoor return-flow systems (Clark County reuses roughly 99%), tiered pricing to limit discretionary use, metering and leak detection, and purple-pipe reuse for landscape/industrial needs.[xxi] Where imports are involved, return-flow credits and basin-of-origin compliance should be spelled out in development agreements.

The first 0–3 years will likely decide the success of these endeavors. Early phases can be conveyed to a small group of master developers to deliver backbone infrastructure – potable water, wastewater and reclaimed-water lines, power, fiber, and primary roads – against clear milestones. An infrastructure fund seeded with land-sale proceeds, plus special-purpose districts issuing revenue or assessment bonds, can

underwrite early works. Digital permitting with firm shot clocks and third-party plan review, pre-approved pattern books, and early recording of phased plats allow many builders to start in parallel under by-right approvals from Freedom Zoning. Finally, federal and local authorities should coordinate with state DOTs and airport authorities to upgrade nearby highways and airports to help align growth with access.

Ranking and selecting Freedom Cities

The goal of Freedom Cities is not only to incorporate land, but to build communities where they are most likely to succeed. To that end, we ranked candidate sites using a set of criteria that reflect both present housing need and future growth potential. These metrics are intended to serve as proxies for unmet demand, latent economic activity, and the likelihood that new development will quickly translate into affordability gains and regional benefits.

Our ranking methodology considers four key indicators:

1. **Displacement pressure** – measured as the median home price-to-income ratio in the encompassing Core-Based Statistical Area (Metro).[xxii] A higher ratio indicates more severe affordability challenges and stronger demand for new supply.
2. **Metro Population** – total metro area population, which serves as a stand-in for the potential size of the housing market.
3. **Job Accessibility** – the total number of jobs within a 10-mile radius of the site, reflecting the potential for economic integration and labor market viability.
4. **Local Demand** – the median home price-to-income ratio of the nearest large municipality (population >50,000), weighted by distance.[xxiii] Further, this measure prioritizes "mirror cities" – Freedom Cities that could make use of the existing infrastructure of nearby municipalities.

This ranking system offers a practical way to identify where new cities could make the greatest immediate impact – by relieving housing pressure in areas of unmet demand and strong economic fundamentals. It emphasizes not just where land is available, but where new homes are most urgently needed, where job access is high, and where housing scarcity is driving affordability crises. Further, due to being located within high-demand metros, these Freedom Cities are well suited for long-term expansion. All can incorporate between 20,000 and 200,000 homes at single-family densities, and most have capacity for spatial growth via developable BLM land if necessary after the 25-year buildout.

We prioritized areas where public investment can be leveraged efficiently – places near job centers, transportation corridors, or stalled infrastructure projects. Still, this ranking is meant as a starting point, not a final designation. Local expertise, market dynamics, and unforeseen challenges will inevitably shape outcomes. The dataset underlying this analysis is available for public review and refinement, and we encourage communities, planners, and researchers to build upon it.

Results

Across the ten Western states, we identify roughly 400 potential Freedom City sites. Arizona alone contains 54 sites totaling about 1,940 square miles with buildout capacity for more than 5 million

homes. Idaho, with 81 sites spread over nearly 1,574 square miles, could support around 4 million homes. California's 27 sites together account for nearly 1.9 million homes, while Colorado's 12 sites cover over 400 square miles with the potential for just over 1 million homes. Even Montana, with only three sites, has space for over 200,000 homes. In total, these Freedom Cities would be sufficient area for 33 million homes, still using just 1% of all federal land. Moving forward, we will focus only on our top twenty candidates.

Top 20 Freedom Cities

Altogether, the top twenty Freedom Cities—two in each of the ten Western states—account for roughly 520 square miles of land and nearly 1.4 million homes at buildout capacity. Arizona's best candidates together span about 37 square miles, with capacity for 98,000 homes. California's top sites, though smaller in land area at 50 square miles combined, still allow for roughly 125,000 homes. The largest Freedom Cities are in Colorado and Nevada, accounting for 500,000 homes combined. Idaho's top two sites are compact, covering only 24 square miles, but still support more than 60,000 homes. Even Montana, with its limited land area, has two strong candidates amounting to 148,000 homes.

Baseline Housing and Financial Projections			
Freedom City Metro	**Housing Potential at Buildout**	**Estimated Average Home Value**	**10-year Cumulative Property Tax at 1%**
Bend, OR	34,458	$511,960	$352,824,811
Bend, OR	67,864	$511,960	$694,876,345
Lake Havasu City-Kingman, AZ	33,669	$318,240	$214,297,215
Riverside-San Bernardino-Ontario, CA	43,139	$460,705	$397,482,833
St. George, UT	33,932	$439,024	$297,940,924
Lake Havasu City-Kingman, AZ	64,182	$318,240	$408,504,066
Riverside-San Bernardino-Ontario, CA	82,332	$460,705	$758,610,529
Reno, NV	97,325	$440,829	$858,071,496
St. George, UT	43,928	$439,024	$385,706,467
Las Vegas-Henderson-North Las Vegas, NV	49,715	$353,479	$351,460,860
Rexburg, ID	27,882	$360,605	$201,089,392
Boise City, ID	36,036	$390,948	$281,767,796
Grand Junction, CO	208,591	$322,205	$1,344,178,624
Grand Junction, CO	171,765	$322,205	$1,106,870,923
Las Cruces, NM	56,817	$212,082	$240,996,187
Las Cruces, NM	60,762	$212,082	$257,732,034
Billings, MT	56,291	$308,609	$347,435,243

Billings, MT	91,801	$308,609	$566,611,682
Cody, WY	86,277	$350,653	$605,066,274
Cody, WY	30,513	$350,653	$213,986,853

Financially, the implications are also significant. With median home values across candidate metros ranging from $340,000 in Albuquerque to $640,000 in Bend, the projected housing output of the top twenty sites alone represents approximately $500 billion in residential property value at buildout capacity. At a representative effective property tax rate of 1 percent, this translates into $5 billion annually in local revenue from housing, not counting the commercial and industrial base that would naturally accompany new cities. By year 10 of development—assuming a steady pace of 4 percent of total homes completed annually—these sites would already support 560,000 homes and generate a cumulative $10 billion in property tax receipts.

Creating Freedom Cities as Complete Communities:

Freedom Zoning would allow by-right residential development that provides a combination of structure and tenure types and sizes, bedroom mix, and price points, with a focus, to the extent possible, on walkability to amenities and nearness to jobs.

Freedom Zoning is the key to providing broad affordability by allowing builders the flexibility by-right to build varying structure types on smaller lots. This will allow workers, who will be key to a Freedom City's success, to have access to housing that is affordable.

This flexibility will include a variety of lot sizes and building types to enhance affordability and supply, including:

- **Single-family detached homes:** flexibility to provide smaller lots ranging from 3000-7000 square feet.
- **Single-family attached homes:** flexibility to provide smaller lots ranging from 1000-3000 square feet.
- **Light-touch density in single-family areas:** flexibility to include more housing types, such as duplexes, triplexes, and fourplexes. The goal of LTD is to expand housing supply and increase affordability while maintaining the scale and form.
- **Residential and mixed use:** flexibility to provide residential housing and mixed uses in and near commercial and light-industrial districts.

Conclusion

The United States faces a persistent housing shortage that existing cities have not solved, and in many cases, have actively contributed to creating. Freedom Cities offer a lawful and scalable response: transfer limited, carefully selected BLM land to private developers under the Federal Land Policy and Management Act of 1976 (FLPMA), and allow development to proceed under Freedom Zoning, market-driven development, minimized bureaucratic discretion, and incorporation.

The ranking and selection framework targets where Freedom Cities can relieve the housing shortage immediately and at scale. By using displacement pressure (Metro price-to-income ratio), metro population, job accessibility, and local demand, the top candidates are the places where new supply will be absorbed rapidly, filtering will operate strongly, and infrastructure can be leveraged efficiently. This is why the top twenty sites (two in each of the Ten Western States) concentrate land where people, jobs, and price pressure already are, not where they are hoped to be.

The housing and financial estimates at buildout capacity are material. With only conservative estimates (though liberal land-use laws) the top twenty Freedom Cities encompass 520 square miles and nearly 1.4 million homes under conservative, single-family-based assumptions. Further, these cities can generate $5 billion annual in today's dollars at buildout capacity, indicating that they would easily be self-financing. These assumptions are not meant to be forecasts, but the conclusion that even under conservative assumptions, Freedom Cities add large, fast-absorbing supply inside high-demand Metros, advancing affordability through filtering without requiring ongoing operating subsidies.

Freedom Cities are also executable. FLPMA provides a defined path for land disposal when expansion of communities and economic development serve important public objectives that cannot be prudently or feasibly achieved elsewhere. Freedom Cities can proceed through competitive bidding or modified competitive bidding, at not less than fair market value, with congressional notification for individual sales over 2,500 acres.

Freedom Cities are not a substitute for reform inside existing cities, but a complement that creates long-term, large-scale communities for people to live in. By allowing market-driven development under Freedom Zoning, minimizing bureaucratic discretion, and incorporating to ensure they have the authority to continue to grow, Freedom Cities can turn underutilized federal land into complete communities that reduce the housing shortage, improve affordability, and expand opportunity. The federal government has the authority; the market has the demand; the criteria identify the locations. The policy choice is only whether to act.

Appendix

Appendix 1: Excerpted text from The Federal Land Policy and Management Act of 19763

Sales of Public Land Tracts Sec. 203 [43 U.S.C. 1713].

(a) Criteria for disposal; excepted lands A tract of the public lands (except land in units of the National Wilderness Preservation System, National Wild and Scenic Rivers Systems, and National System of Trails)

[3] https://www.blm.gov/sites/blm.gov/files/AboutUs_LawsandRegs_FLPMA.pdf

may be sold under this Act where, as a result of land use planning required under section 202 of this Act, the Secretary determines that the sale of such tract meets the following disposal criteria:

(1) such tract because of its location or other characteristics is difficult and uneconomic to manage as part of the public lands, and is not suitable for management by another Federal department or agency; or

(2) such tract was acquired for a specific purpose and the tract is no longer required for that or any other Federal purpose; or 8 FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976

(3) disposal of such tract will serve important public objectives, including but not limited to, expansion of communities and economic development, which cannot be achieved prudently or feasibly on land other than public land and which outweigh other public objectives and values, including, but not limited to, recreation and scenic values, which would be served by maintaining such tract in Federal ownership.

(b) Conveyance of land of agricultural value and desert in character Where the Secretary determines that land to be conveyed under clause (3) of subsection (a) of this section is of agricultural value and is desert in character, such land shall be conveyed either under the sale authority of this section or in accordance with other existing law.

(c) Congressional approval procedures applicable to tracts in excess of two thousand five hundred acres Where a tract of the public lands in excess of two thousand five hundred acres has been designated for sale, such sale may be made only after the end of the ninety days (not counting days on which the House of Representatives or the Senate has adjourned for more than three consecutive days) beginning on the day the Secretary has submitted notice of such designation to the Senate and the House of Representatives, and then only if the Congress has not adopted a concurrent resolution stating that such House does not approve of such designation. If the committee to which a resolution has been referred during the said ninety day period, has not reported it at the end of thirty calendar days after its referral, it shall be in order to either discharge the committee from further consideration of such resolution or to discharge the committee from consideration of any other resolution with respect to the designation. A motion to discharge may be made only by an individual favoring the resolution, shall be highly privileged (except that it may not be made after the committee has reported such a resolution), and debate thereon shall be limited to not more than one hour, to be divided equally between those favoring and those opposing the resolution. An amendment to the motion shall not be in order, and it shall not be in order to move to reconsider the vote by which the motion was agreed to or disagreed to. If the motion to discharge is agreed to or disagreed to, the motion may not be made with respect to any other resolution with respect to the same designation. When the committee has reprinted, or has been discharged from further consideration of a resolution, it shall at any time thereafter be in order (even though a previous motion to the same effect has been disagreed to) to move to proceed to the consideration of the resolution. The motion shall be highly privileged and shall not be debatable. An amendment to the motion shall not be in order, and it shall not be in order to move to reconsider the vote by which the motion was agreed to or disagreed to.

(d) Sale price Sales of public lands shall be made at a price not less than their fair market value as determined by the Secretary.

(e) Maximum size of tracts The Secretary shall determine and establish the size of tracts of public lands to be sold on the basis of the land use capabilities and development requirements of the lands; and, where any such tract which is judged by the Secretary to be chiefly valuable for agriculture is sold, its size shall be no larger than necessary to support a family-sized farm.

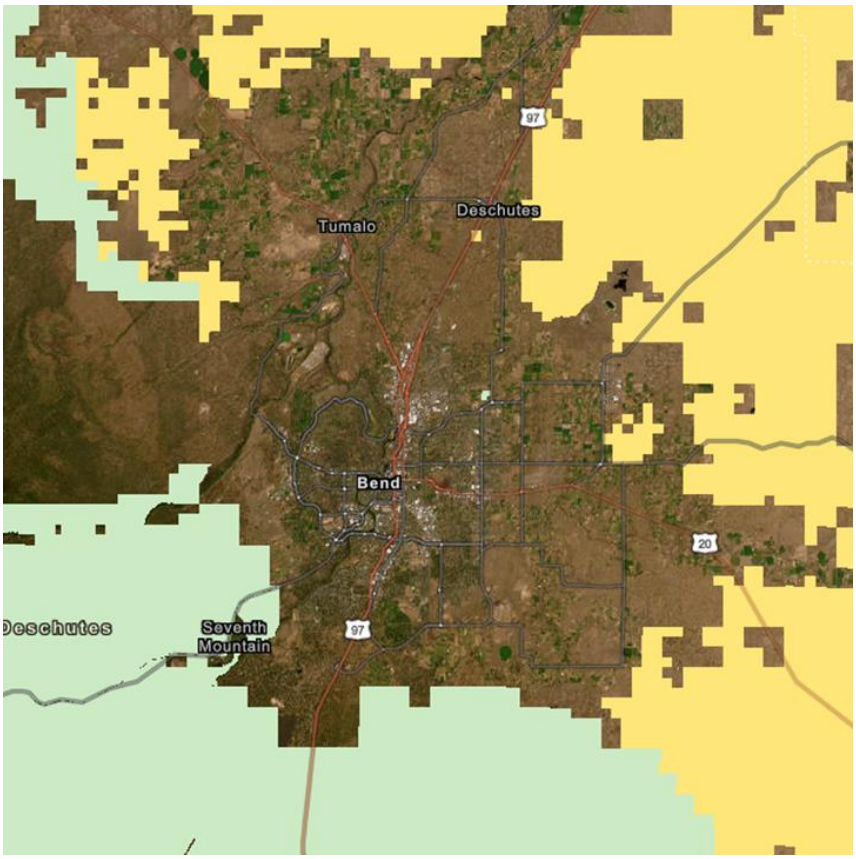
(f) Competitive bidding requirements Sales of public lands under this section shall be conducted under competitive bidding procedures to be established by the Secretary. However, where the Secretary determines it necessary and proper in order

> (1) to assure equitable distribution among purchasers of lands, or
>
> (2) to recognize equitable considerations or public policies, including but not limited to, a preference to users, [the Secretary] may sell those lands with modified competitive bidding or without competitive bidding. In recognizing public policies, the Secretary shall give consideration to the following potential purchasers:
>
> > (1) the State in which the land is located;
> >
> > (2) the local government entities in such State which are in the vicinity of the land;
> >
> > (3) adjoining landowners; Public Law 94–579—October 21, 1976, as amended through December 19, 2014 9
> >
> > (4) individuals; and
> >
> > (5) any other person.

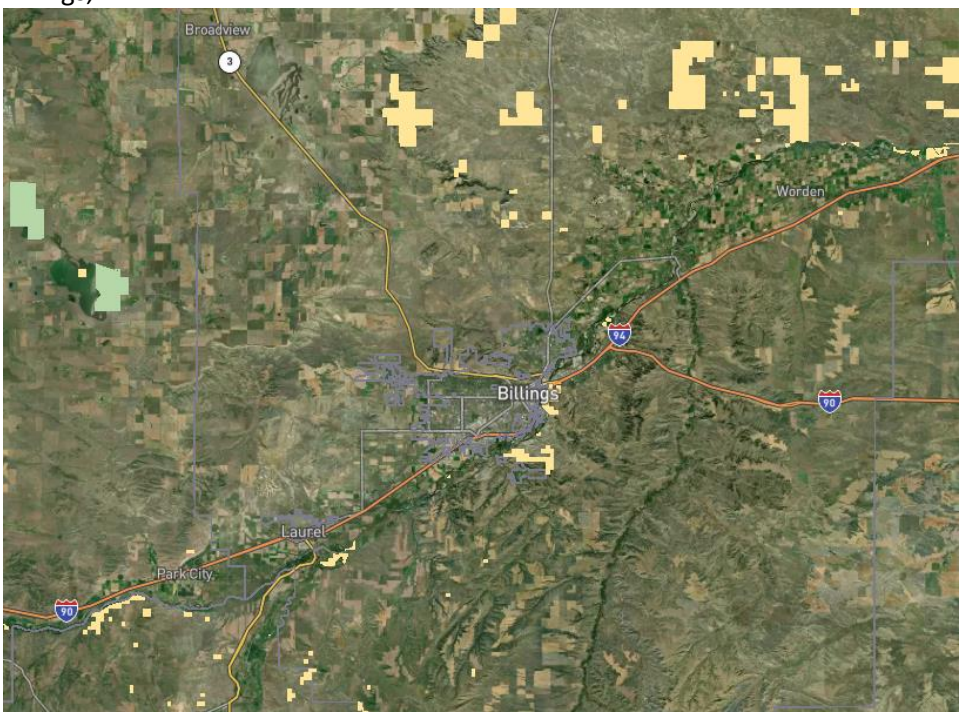
(g) Acceptance or rejection of offers to purchase The Secretary shall accept or reject, in writing, any offer to purchase made through competitive bidding at [the Secretary's] invitation no later than thirty days after the receipt of such offer or, in the case of a tract in excess of two thousand five hundred acres, at the end of thirty days after the end of the ninety-day period provided in subsection (c) of this section, whichever is later, unless the offeror waives [his or her] right to a decision within such thirty-day period. Prior to the expiration of such periods the Secretary may refuse to accept any offer or may withdraw any land or interest in land from sale under this section when [the Secretary] determines that consummation of the sale would not be consistent with this Act or other applicable law.

Appendix 2: Federal land constraint

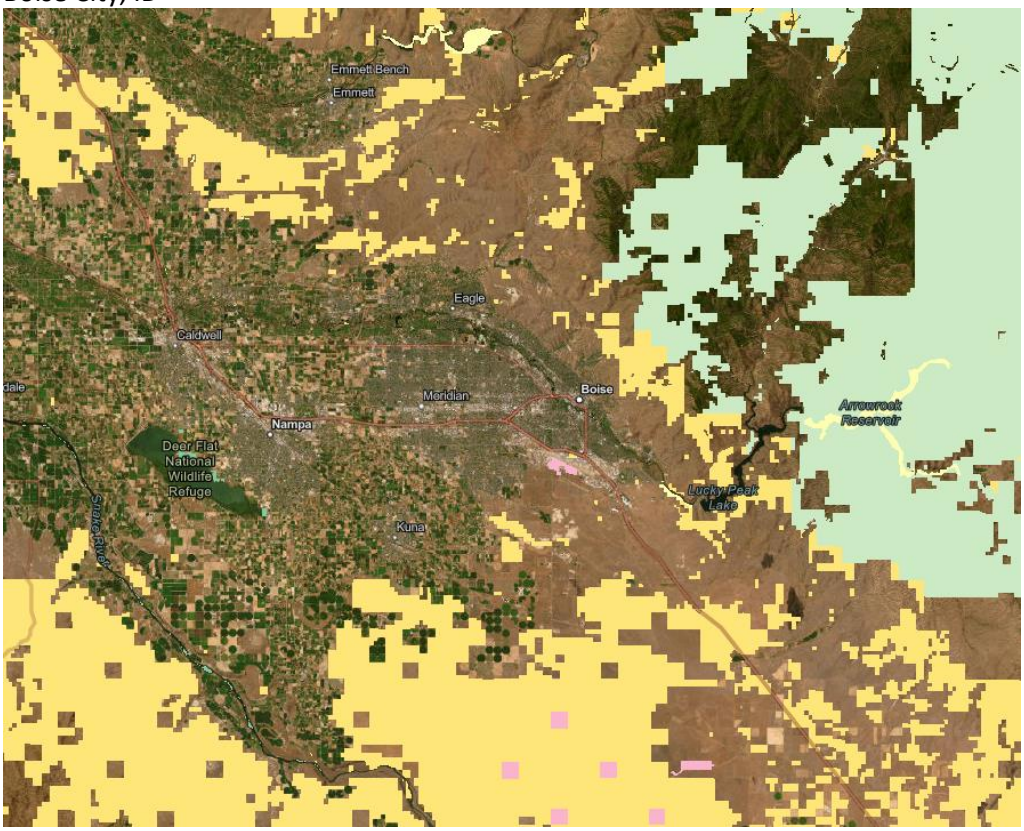
Bend, OR


97
Tumalo
Deschutes
Bend
20
Deschutes
Seventh
Mountain
97

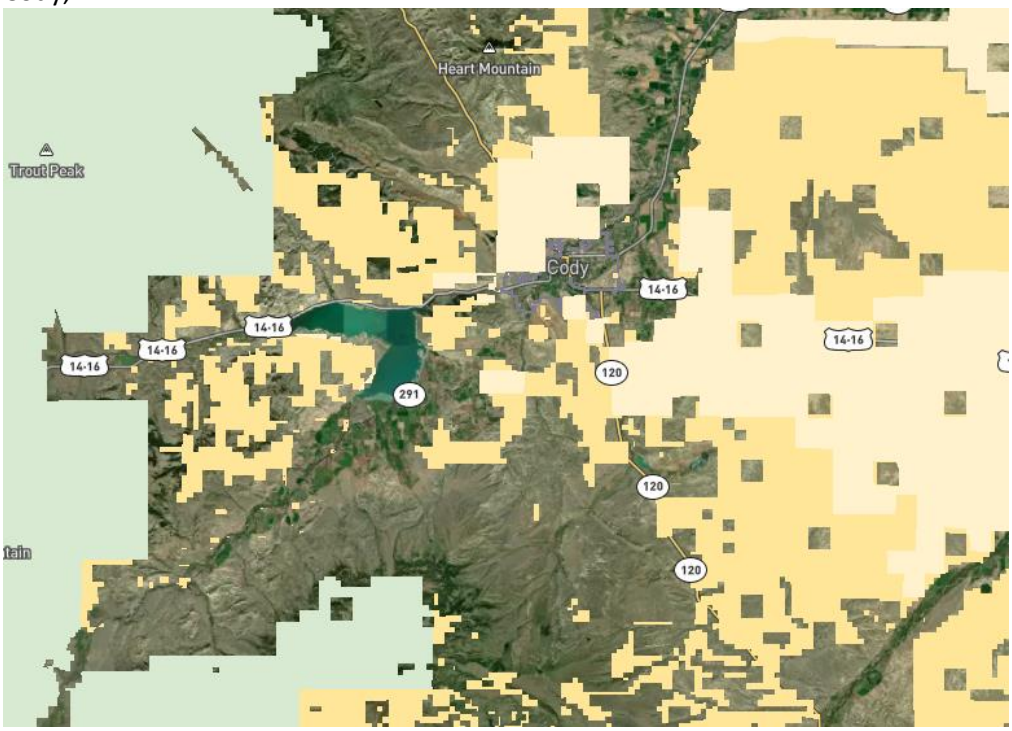
Billings, MT


Broadview
3
Worden
94
Billings
90
Laurel
Park City
90

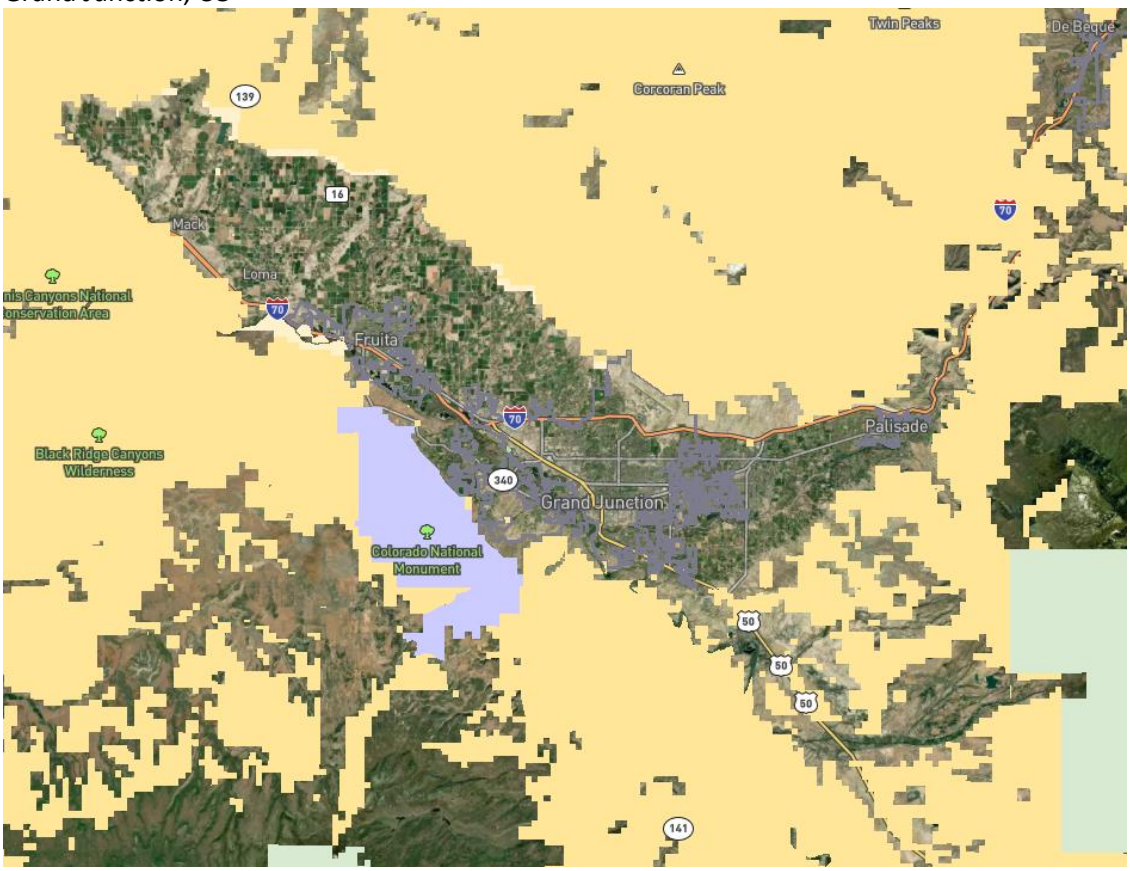
Boise City, ID



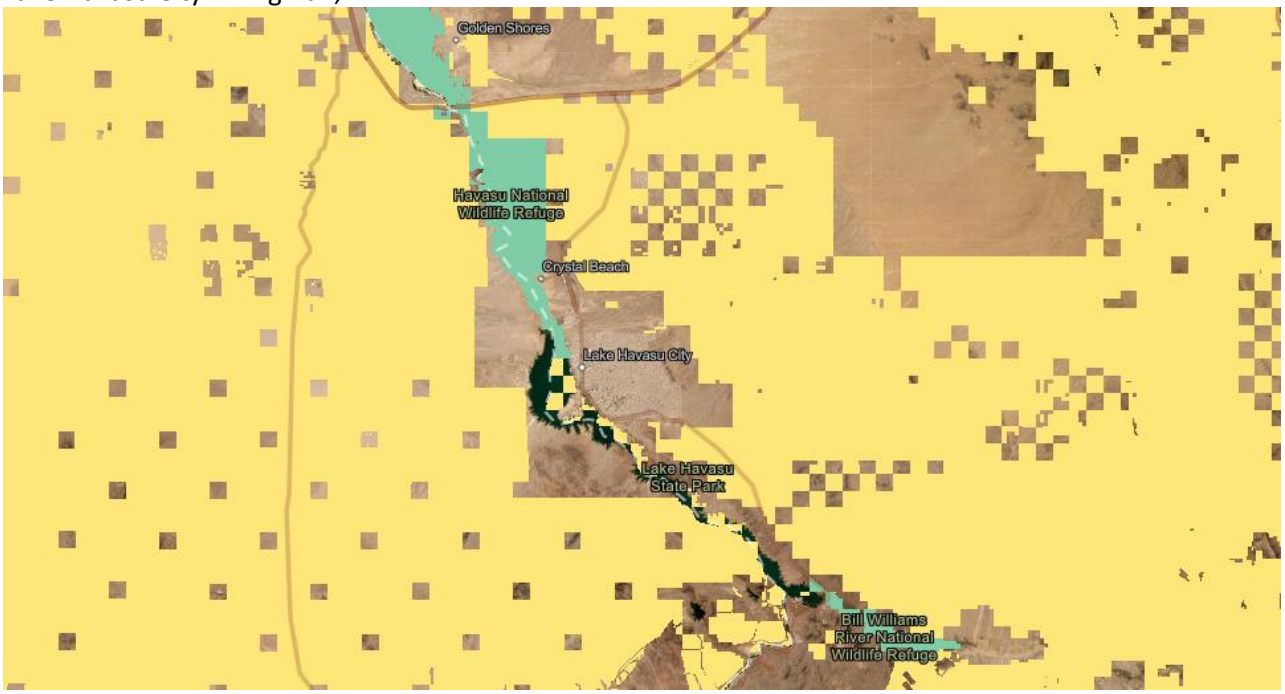
Cody, WY



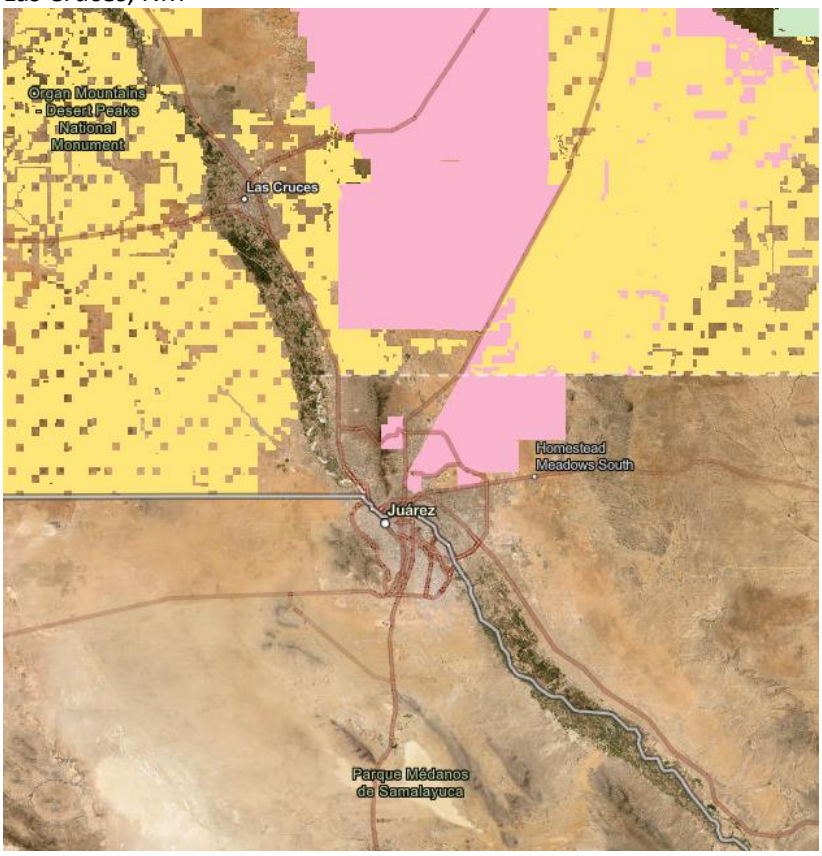
Grand Junction, CO



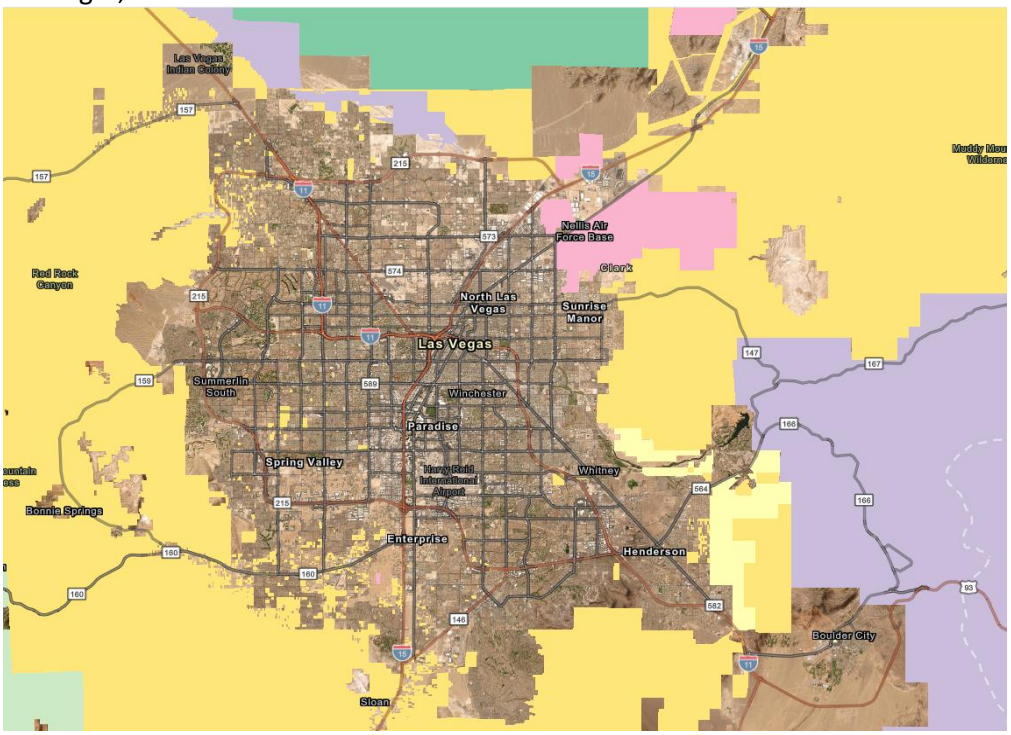
Lake Havasu City – Kingman, AZ



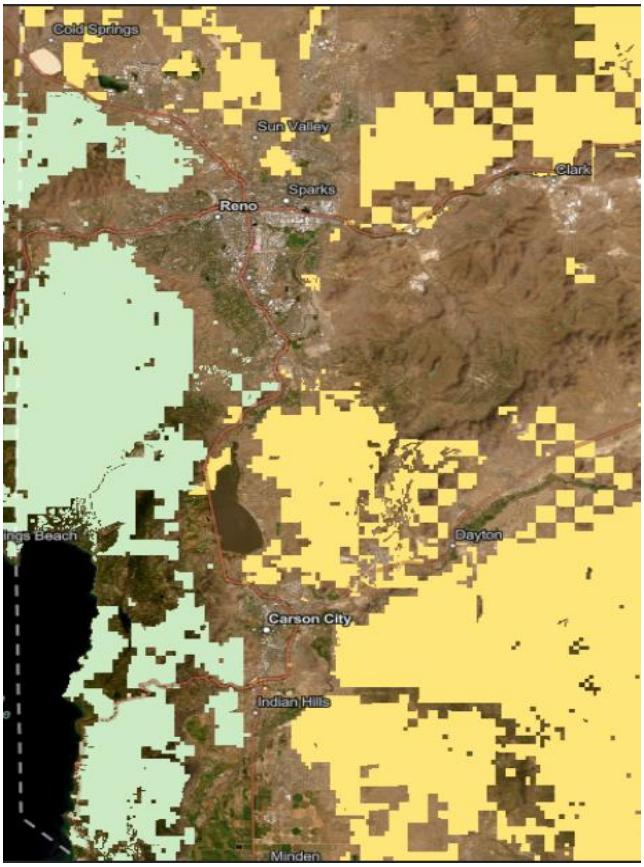
Las Cruces, NM



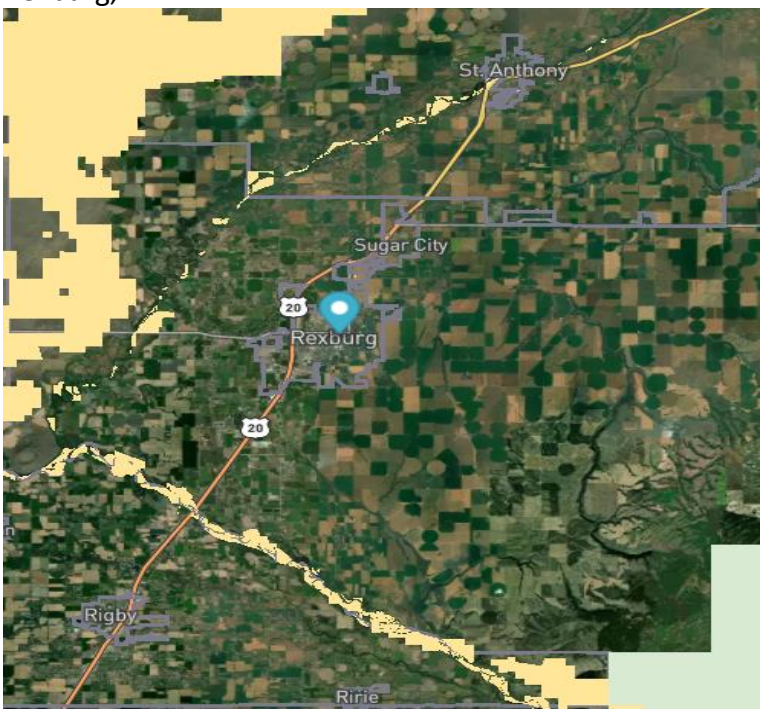
Las Vegas, NV



Reno, NV

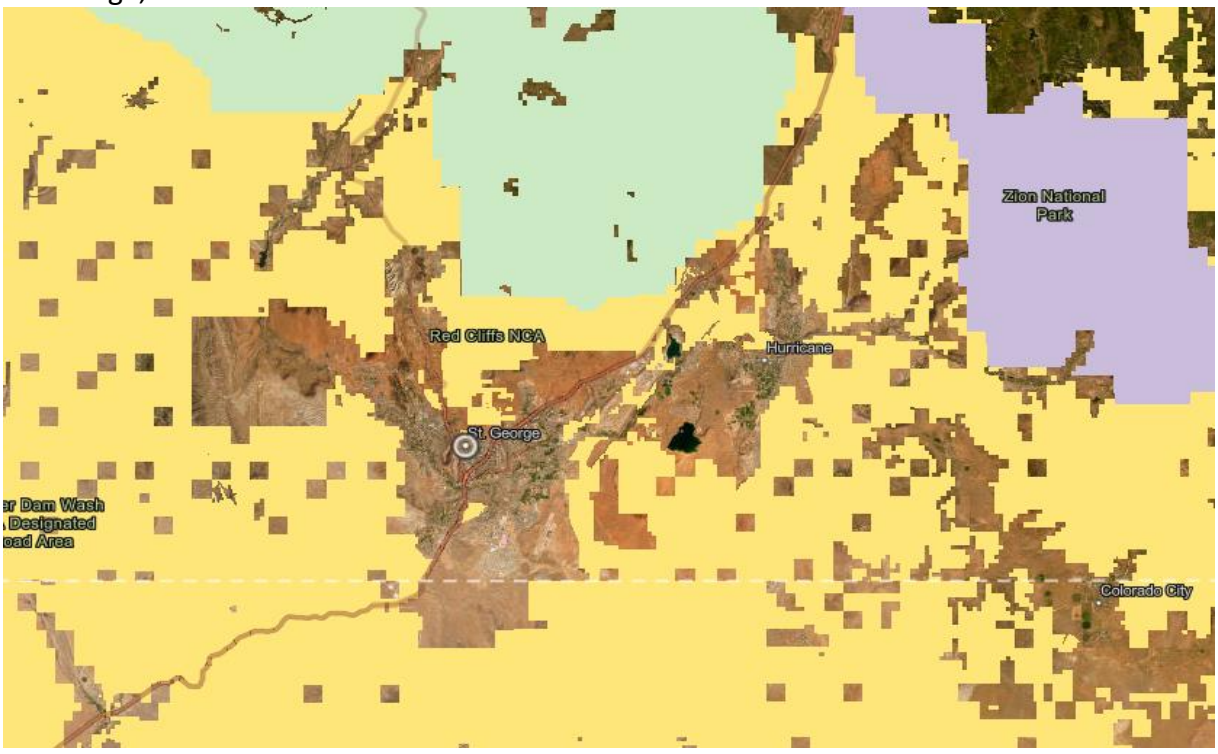


Rexburg, ID



Riverside-San Bernardino-Ontario, CA

St. George, UT



[i] The Federal Land Policy and Management Act of 1976, as amended

[ii] "Principles for Enhancing Housing Availability and Affordability

[iii] https://heat.aeihousingcenter.org/toolkit/housing_shortage

[iv] https://www.realtor.com/research/us-housing-supply-gap-march-2023/#:~:text=,home%20constructions%20and%20household%20formations

[v] https://heat.aeihousingcenter.org/toolkit/hpa_wage. 10-state average weighted by population.

[vi] https://www.aei.org/wp-content/uploads/2024/09/Filtering-overview-Final.pdf?x85095

[vii] https://www.sciencedirect.com/science/article/abs/pii/S0094119021000656

[viii] https://www.sciencedirect.com/science/article/abs/pii/S0166046221001186

[ix] https://ternercenter.berkeley.edu/blog/residential-impact-fees/#:~:text=housing,them%20without%20detailed%20development%20plans

[x] Spatial processing performed using the R package sf.

[xi] The National Elevation Dataset. https://www.usgs.gov/publications/national-elevation-dataset. R package terra.

[xii] Saiz 2010

[xiii] https://www.usgs.gov/national-hydrography/access-national-hydrography-products

[xiv] The following water designations in the were classified as high quality:" Lake/Pond", "Lake/Pond: Hydrographic Category = Perennial", "Lake/Pond: Hydrographic Category = Perennial; Stage = Average Water Elevation", "Lake/Pond: Hydrographic Category = Perennial; Stage = Date of Photography", "Lake/Pond: Hydrographic Category = Perennial; Stage = Normal Pool", "Reservoir", "Reservoir: Construction Material = Nonearthen", "Reservoir: Reservoir Type = Water Storage", "Reservoir: Reservoir Type = Water Storage; Construction Material = Earthen; Hydrographic Category = Perennial", "Reservoir: Reservoir Type = Water Storage; Construction Material = Nonearthen", "Reservoir: Reservoir Type = Water Storage; Hydrographic Category = Perennial", "Stream/River", and "Stream/River: Hydrographic Category = Perennial".

[xv] We exclude from consideration ephemeral water bodies, which typically hold water for a period of less than 24 hours, from this dataset. We also exclude any water body with a description including the following words: "Dam/Weir", "Pipeline", "Bridge", "Levee", "Coastline", "Lock Chamber", "Spillway", "Gate", "Wall", "Connector", "Underground Conduit", "Water Intake/Outflow", "Flume", "Sounding Datum Line", "Nonearthen Shore", "Canal", "Drainageway", "Ephemeral", or "Wash".

[xvi] PAD-US

[xvii] https://overturemaps.org/. Via overtureR. https://github.com/arthurgailes/overtureR

[xviii] Public records data show that jurisdictions with at least 20,000 single-family lots have a median of 36 percent of their land area dedicated to residential lots. 30 percent of land is a conservative estimate derived from interviews of developers of new large neighborhoods.

[xix] In an analysis of Nevada single-family homes, 13.7 acres corresponds to building 80 percent of homes at the 90th percentile density for single-family detached, and 20 percent of homes at the median density for townhomes.

[xx] First American

[xxi] https://www.snwa.com/water-resources/where-water-comes-from/index.html

[xxii] We use the term Metro here as synonymous with CBSA, meaning that it can also include micropolitan areas.

[xxiii] We define the distance weight as $1 - \frac{d}{50}$, where *d* is the distance in miles to the nearest large municipality. This weight decreases linearly with distance and applies only when the distance is less than or equal to 50 miles. If the distance exceeds 50 miles, the weight is set to zero.