

(10) Governance models, including options for charter structures, municipal autonomy, direct democratic mechanisms, and coordination with Federal authorities.

(11) Public health infrastructure, including integrated hospital systems, medical research facilities, and distributed medical manufacturing capability.

(12) National security implications, including strategic redundancy of coastal population centers and critical infrastructure decentralization.

(13) International engagement potential, including the feasibility of hosting global institutions, scientific assemblies, and international organizations.

(14) The feasibility of such city serving as a future national capital.

(d) Phased development.—The study shall evaluate phased construction scenarios, including initial development for 250,000 residents, expansion to 1,000,000 residents, and long-term capacity beyond 5,000,000 residents.

(e) Cost and financing.—The study shall evaluate estimated capital costs, financing mechanisms including potential financing through the National Infrastructure Bank established under section 642 of this Act, revenue generation models, and long-term fiscal sustainability.

(f) Report.—Not later than January 1, 2028, the Secretary shall submit to Congress and make publicly available a report containing findings, cost estimates, risk assessments, and legislative recommendations.

Subtitle A—Reining in Large Housing Investment Groups

SEC. 411. DEFINITIONS.

(a) Definitions.—For purposes of this subtitle:

(1) Community land trust.—The term "community land trust" means a nonprofit organization that acquires and holds land for the benefit of a community, maintains ownership of such land permanently, and leases such land to homeowners or tenants under long-term ground leases in order to preserve affordability.

(2) Covered institutional investor.—The term "covered institutional investor" means any institutional investor that controls, directly or indirectly, excessive housing stock. For purposes of determining control, all entities under common control, management, beneficial ownership, or operational direction shall be aggregated.

(3) Excessive housing stock.—The term "excessive housing stock" means single-family residential properties in excess of 10 nationwide owned or under similar control by a single entity, excluding qualified builder inventory.

(4) Qualified builder inventory.—The term "qualified builder inventory" means residential property, raw land, subdivided lots, or single-family residential properties under construction that are owned or controlled by a person engaged in the business of residential construction or development, if—

(A) the property, land, lots, or single-family residential properties are held in the ordinary course of that construction or development business for initial sale after construction, subdivision, or development;

(B) the person does not rent or lease the property, land, lots, or single-family residential properties;

(C) the person does not hold the property, land, lots, or single-family residential properties primarily for long-term investment or asset-price appreciation; and

(D) the property, land, lots, or single-family residential properties are not transferred, directly or indirectly, to a covered institutional investor.

(5) Institutional investor.—The term "institutional investor" means any for-profit business entity, including any corporation, partnership, limited liability company, trust, real estate investment trust, private equity fund, hedge fund, investment company, or any group of related or affiliated entities, that directly or indirectly acquires, owns, or holds residential property for investment or profit.

(6) Manufactured-home community or park.—The term "manufactured-home community or park" means any property consisting of multiple manufactured-home sites, pads, or lots, whether held in fee simple or under long-term lease or concession arrangement.

(7) Nationwide.—The term "nationwide" means within any State, the District of Columbia, or any territory or possession of the United States.

(8) Nonprofit housing organization.—The term "nonprofit housing organization" means an organization described in section 501(c)(3) of the Internal Revenue Code of 1986 that is exempt from taxation under section 501(a) of such Code and that is primarily engaged in the provision, construction, rehabilitation, or preservation of affordable housing.

(9) Person.—The term "person" has the meaning given that term in section 12(a) of the Clayton Act ([15 U.S.C. 12\(a\)](#)).

(10) Public housing agency.—The term "public housing agency" has the meaning given that term in section 3(b) of the United States Housing Act of 1937 ([42 U.S.C. 1437a\(b\)](#)).

(11) Raw land.—The term "raw land" means land that is unimproved and not occupied by any permanent residential or commercial structure, and that has not been graded, subdivided, platted, or otherwise prepared for residential or commercial development. The placement of any temporary, movable, or non-permanent structure, including a manufactured home or recreational vehicle, shall not be considered an improvement for purposes of this definition.

(12) Residential property.—The term "residential property" means any single-family residential property, multifamily residential property, condominium unit, townhouse, manufactured home, or manufactured-home community or park, except that such term does not include any hotel, motel, or other establishment used primarily for short-term lodging.

(13) Secretary.—The term "Secretary" means the Secretary of the Treasury.

(14) Single-family residential property.—The term "single-family residential property" means any 1- to 4-unit residential dwelling, including any accessory structures and the land underlying such dwelling.

(15) Tribal housing entity.—The term "Tribal housing entity" means a Tribally designated housing entity, as defined in section 4(22) of the Native American Housing Assistance and Self-Determination Act of 1996 ([25 U.S.C. 4103\(22\)](#)).

SEC. 412. DENIAL OF CERTAIN TAX BENEFITS.

(a) In general.—[Part IX of subchapter B of chapter 1](#) of the Internal Revenue Code of 1986 is amended by adding at the end the following new section:

"Sec. 280I. Denial of certain tax benefits for excessive residential holdings.

"(a) Denial of depreciation.—No deduction for depreciation shall be allowed under this chapter with respect to any single-family residential property held by a covered institutional investor.

"(b) Denial of interest and expense deductions.—No deduction shall be allowed under this chapter for interest, insurance, real property taxes, or management fees associated with the ownership, financing, or operation of a single-family residential property held by a covered institutional investor.

"(c) Limitation on loss deductions.—A covered institutional investor may not claim any loss deduction with respect to the sale or disposition of a single-family residential property unless such property is sold to—

"(1) an owner-occupant purchaser;

"(2) a nonprofit housing organization;

"(3) a community land trust;

"(4) a public housing agency; or

"(5) a Tribal housing entity.

"(d) No carryforwards or transfers.—Any deduction disallowed under this section may not be carried forward to any succeeding taxable year and may not be transferred to any other taxpayer or affiliated entity.

"(e) Anti-avoidance and penalties.—

"(1) Anti-avoidance and implementation rules.—Not later than December 31, 2026, the Secretary shall issue interim final rules to prevent avoidance of this section, carry out subsections (f)(1) and (g), establish certification, minimum occupancy, recapture, and anti-evasion requirements for owner-occupant purchasers, and determine when a taxpayer is a covered institutional investor and how deductions shall be allocated for a taxable year during which the taxpayer's holdings change, including rules requiring the aggregation of entities with common ownership, control, or management, and rules disregarding the use of shell entities, nominee titleholders, or special-purpose vehicles. The interim final rules shall take effect upon publication in the Federal Register, shall have the force and effect of law, and may be issued

without regard to [section 553 of title 5](#), United States Code. The Secretary shall provide a public comment period of not less than 60 days after publication and shall issue final rules not later than September 30, 2027. A delay in issuing or finalizing rules shall not delay, limit, extinguish, or reduce any prohibition, limitation, penalty, or duty established by this section.

"(2) Civil penalties.—A covered institutional investor that fails to comply with this section or regulations prescribed under paragraph (1) shall be subject to a civil penalty equal to 3 times the amount of any deduction disallowed under this section, plus an additional penalty of \$25,000 per property per taxable year.

"(f) Definitions.—In this section—

"(1) the term 'owner-occupant purchaser' means a natural person who acquires a single-family residential property and occupies or intends to occupy at least 1 dwelling unit in such property as the principal residence of that person; and

"(2) the terms 'community land trust', 'covered institutional investor', 'nonprofit housing organization', 'public housing agency', 'single-family residential property', and 'Tribal housing entity' have the meanings given those terms in section 411 of the POPULIST Act.

"(g) Divestiture safe harbor.—Subsections (a) and (b) shall not apply for a taxable year to a covered institutional investor that is not liable for tax under section 4983 for that taxable year by reason of satisfying the divestiture safe harbor under subsection (b) of that section."

(b) Clerical amendment.—The table of sections for part IX of subchapter B of chapter 1 of the Internal Revenue Code of 1986 is amended by adding at the end the following new item:

"Sec. 280I. Denial of certain tax benefits for excessive residential holdings."

(c) Effective date.—The amendments made by this section shall apply to taxable years beginning after December 31, 2026.

SEC. 413. TAX ON EXCESSIVE SINGLE-FAMILY RESIDENTIAL HOLDINGS.

(a) In general.—[Subtitle D](#) of the Internal Revenue Code of 1986 is amended by inserting after chapter 44 the following new chapter:

"CHAPTER 44A—EXCESSIVE RESIDENTIAL PROPERTY HOLDINGS

"SEC. 4983. Tax on excessive single-family residential holdings.

"Sec. 4983. Tax on excessive single-family residential holdings.

"(a) Imposition of tax.—For taxable years beginning after December 31, 2026, there is imposed on each covered institutional investor a tax equal to \$50,000 for each single-family residential property in excess of 10 nationwide that is controlled by such investor at the close of the taxable year.

"(b) Divestiture safe harbor.—No covered institutional investor shall be liable for the tax imposed under subsection (a) for a taxable year if the investor divests excessive housing stock in

accordance with the following schedule. As used in this subsection, the term 'base stock' means the quantity of single-family residential properties controlled by the investor at the end of the 2026 taxable year:

"(1) For the 2027 taxable year, single-family residential holdings are reduced to less than 80 percent of the base stock.

"(2) For the 2028 taxable year, single-family residential holdings are reduced to less than 60 percent of the base stock.

"(3) For the 2029 taxable year, single-family residential holdings are reduced to less than 35 percent of the base stock.

"(c) Anti-avoidance.—The Secretary shall prescribe regulations to prevent evasion or avoidance of this section, including:

"(1) rules requiring the aggregation of entities with common ownership, control, or management;

"(2) rules disregarding the use of shell entities, nominee titleholders, or special-purpose vehicles; and

"(3) rules treating multiple entities as a single covered institutional investor if such entities are under common beneficial ownership.

"(d) Enforcement.—The Secretary, acting through the Internal Revenue Service, shall enforce the requirements of this section.

"(e) Penalties.—A covered institutional investor that fails to comply with this section or regulations prescribed under subsection (c) shall be subject to a civil penalty equal to 3 times the amount of the tax which was properly due. It shall not be a defense to this subsection that an avoidance attempt was unsuccessful.

"(f) Nondeductibility.—No deduction shall be allowed under this title for any tax imposed by this section, or any interest, penalty, or other amount imposed with respect to such tax.

"(g) Definitions.—In this section, the terms 'covered institutional investor', 'excessive housing stock', 'nationwide', and 'single-family residential property' have the meanings given those terms in section 411 of the POPULIST Act."

(b) Clerical amendment.—The table of chapters for subtitle D of the Internal Revenue Code of 1986 is amended by inserting after the item relating to chapter 44 the following new item:

"44A. Excessive residential property holdings."

SEC. 414. PROHIBITION ON EXCESSIVE HOUSING STOCK ACQUISITIONS.

(a) Prohibition.—It shall be unlawful for an institutional investor to acquire excessive housing stock.

(b) Qualified builder inventory.—For purposes of subsection (a), a single-family residential property shall be treated as acquired on the date on which the property ceases to constitute qualified builder inventory.

(c) Civil penalty.—An institutional investor that violates subsection (a) shall be liable for a civil penalty of \$50,000 for each single-family residential property acquired in violation of that subsection, plus \$1,000 for each such property for each day during which the institutional investor continues to own or control the property.

(d) Enforcement.—The Federal Trade Commission, the Attorney General, or the attorney general of a State may bring a civil action in an appropriate district court of the United States to enforce this section and obtain civil penalties, divestiture, injunctive relief, and any other appropriate equitable relief.

(e) Effective date.—This section shall take effect on December 1, 2026.

SEC. 415. ACQUISITION REPORTING AND ANTITRUST OVERSIGHT.

(a) Aggregation of acquisitions.—For purposes of section 7A of the Clayton Act ([15 U.S.C. 18a](#)), all acquisitions of residential property by any person, directly or indirectly, during a single calendar year shall be treated as a single aggregated acquisition, and the total consideration for such aggregated acquisition shall be treated as the total consideration paid or expected to be paid during such year for purposes of determining filing obligations under that section.

(b) Reporting requirement.—Beginning March 1, 2027, no person may acquire residential property in a transaction or series of transactions that, when aggregated under subsection (a), would result in total consideration exceeding the thresholds established under [section 7A\(a\)\(2\)](#) of the Clayton Act unless that person has filed all notifications required under that section with respect to the aggregated acquisition.

(c) Interim final rules and final regulations.—

(1) Interim final rules.—Not later than March 1, 2027, the Federal Trade Commission and the Assistant Attorney General for Antitrust shall issue interim final rules to implement this section, including anti-evasion rules requiring aggregation of commonly owned or controlled entities, disregarding the use of shell or pass-through entities, and treating any transaction structured to avoid reporting obligations as part of the aggregated acquisition. The interim final rules shall take effect upon publication in the Federal Register, shall have the force and effect of law, and may be issued without regard to [section 553](#) of title 5, United States Code.

(2) Public comment; final rules.—The Federal Trade Commission and the Assistant Attorney General for Antitrust shall provide a public comment period of not less than 60 days after publication of the interim final rules and shall issue final rules not later than September 30, 2027.

(3) No delay in statutory protection.—A delay in issuance or finalization of rules under this subsection shall not delay, limit, extinguish, or reduce any prohibition, duty, filing obligation, or enforcement authority established by this section.

(d) Enforcement.—Any violation of this section shall be treated as a violation of [section 7A](#) of the Clayton Act and shall be subject to the penalties and remedies established under subsection (g) of that section.

(e) Rule of construction.—Nothing in this section shall be construed to authorize the acquisition of excessive housing stock otherwise prohibited under section 414.

SEC. 416. CLOSING RAW-LAND AND RESIDENTIAL PROPERTY EXEMPTIONS.

(a) Residential property acquisitions by covered institutional investors.—Section 7A of the Clayton Act ([15 U.S.C. 18a](#)) is amended by adding at the end the following new subsection:

"(l) Residential property acquisitions by covered institutional investors.—

"(1) Definitions.—In this subsection, the terms 'covered institutional investor', 'raw land', and 'residential property' have the meanings given those terms in section 411 of the POPULIST Act.

"(2) Applicability.—Notwithstanding any other provision of this section, any acquisition of residential property by a covered institutional investor shall be subject to the notification and waiting-period requirements of this section, without regard to any exemption provided in [part 802 of title 16](#), Code of Federal Regulations, including [sections 802.2](#) and [802.5](#) of such title.

"(3) Aggregation.—All acquisitions of residential property by a covered institutional investor during a single calendar year shall be aggregated and treated as a single acquisition for purposes of determining filing obligations under this section.

"(4) No exemption for raw land or land zoned for residential use.—No acquisition of raw land or land zoned for residential use shall qualify for any exemption under [part 802 of title 16](#), Code of Federal Regulations, including acquisitions of unimproved land or land upon which a temporary, movable, or non-permanent structure has been placed.

"(5) Rulemaking.—The Federal Trade Commission shall amend its regulations under this section to eliminate any exemption for the acquisition of residential property and any exemption for acquisitions of raw land or land zoned for residential use not later than 180 days after the date of enactment of this subsection.

"(6) Preemption of inconsistent regulations.—To the extent that any regulation is inconsistent with this subsection, such regulation shall have no force or effect."

SEC. 417. PROHIBITIONS ON FEDERAL MORTGAGE ASSISTANCE.

(a) Fannie Mae and Freddie Mac.—Subpart A of part 2 of subtitle A of title XIII of the Housing and Community Development Act of 1992 ([12 U.S.C. 4541 et seq.](#)) is amended by inserting after section 1330 the following:

"Sec. 1331. Prohibition relating to covered institutional investors.

"(a) Prohibition.—The Director shall, by regulation, prohibit the enterprises from purchasing, guaranteeing, securitizing, or lending on any mortgage secured by a single-family residential property (as defined in section 411 of the POPULIST Act) or a manufactured-home community or park under which the borrower or mortgagor is a covered institutional investor (as defined in section 411 of the POPULIST Act).

"(b) Pools.—The Director shall prohibit the enterprises from purchasing or securitizing any interest in a pool that contains a mortgage described in subsection (a).

"(c) Effective date.—The prohibitions of this section shall be effective March 1, 2027."

(b) Ginnie Mae.—Section 302(c) of the National Housing Act ([12 U.S.C. 1717\(c\)](#)) is amended by adding at the end the following:

"(6) The Association may not newly guarantee any trust certificate or other security based or backed by any mortgage under which the borrower or mortgagor is a covered institutional investor (as defined in section 411 of the POPULIST Act), nor may the Association purchase or acquire any such mortgage, whether secured by a single-family residential property (as defined in section 411 of the POPULIST Act) or by a manufactured-home community or park; and

"(7) The prohibitions of paragraph (6) shall be effective March 1, 2027."

(c) Interim final rules and final regulations.—

(1) Interim final rules.—Not later than March 1, 2027, the Federal Housing Finance Agency and the Secretary of Housing and Urban Development shall issue interim final rules to implement this section. The interim final rules shall take effect upon publication in the Federal Register, shall have the force and effect of law, and may be issued without regard to [section 553](#) of title 5, United States Code.

(2) Public comment; final rules.—The Federal Housing Finance Agency and the Secretary of Housing and Urban Development shall provide a public comment period of not less than 60 days after publication of the interim final rules and shall issue final rules not later than September 30, 2027.

(3) No delay in statutory protection.—A delay in issuance or finalization of rules under this subsection shall not delay, limit, extinguish, or reduce any prohibition, duty, restriction, or enforcement authority established by this section.

SEC. 418. RULE OF CONSTRUCTION RELATING TO ROAD PROVISIONS.

Notwithstanding section 1001 of the 21st Century ROAD to Housing Act ([Public Law 119–101](#)) or any amendment made by that section, this subtitle and the amendments made by this subtitle shall apply independently of, and without limitation by, such section 1001. No threshold, exception, safe harbor, exemption, limitation, rule of construction, sunset, or implementation authority established under such section 1001 may be construed to limit, delay, preempt, cause the sunset of, or reduce any prohibition, tax consequence, reporting obligation, filing obligation, penalty, remedy, or enforcement authority established under this subtitle.

Subtitle B—Public Housing Protection and Revitalization

SEC. 421. FINDINGS.

Congress finds the following: