

# 05 //

## rent control in the western states

---

HANNAH RADZIEWICZ  
Portland State University

**HANNAH RADZIEWICZ** is Master of Real Estate Development (MRED) candidate and a Student Fellow at the PSU Center for Real Estate.

*Any errors or omissions are the author's responsibility. Any opinions expressed are those of the author solely and do not represent the opinions of any other person or entity.*

**Rent control is a broad term which defines regulatory mechanisms the state/public enacts to regulate the housing market. Generally rent control has two interrelated goals: to maintain existing affordable housing and to limit disruptions caused by rapid rent increases.**

Through evolution they have become more market friendly as to allow landlords to receive enough compensation to maintain their properties and earn a reasonable profit; further those objectives can get coupled with protecting tenants from unjust eviction, creating mixed-income neighborhoods, and decreasing tenant turnover. Economic pressures such as real wage stagnation, racial disparities, and large housing price increase in cities across the US has caused local governments to increasingly adopt laws and regulations that try to reduce inequalities in access to housing and improve economic opportunities through lessening the housing burden for their residents. There is an inherent power struggle inside of the tenant-landlord relationship which can be described in part in the language of economics: landlords have an enormous information advantage over tenants. Further, there is a deeper asymmetry at play; for the landlord it is a lease and profit, for a tenant it is home and an economic burden. In order to mitigate this power inequality federal, state, and local governments have stepped in at different points throughout history. Due to this, politics also play a large role in rental regulations. In this paper we will first explore the general history, differing ideological positions on rent control, dive into two state incubators, and look at the current environment for the 6 major western states.

## **HISTORY OF RENT CONTROL IN THE US**

In US history there have been successive phases of rent control. The very first iteration of rent control occurred during World War I, due to low vacancy rates and massive labor-market restructuring for war production; 82 cities established "Fair Rent" committee of landlords, tenants, organized labor, and the general public. They pushed for restrictions to be imposed, but they lacked legal power. The fair rent committees were successful at reaching settlements with tenant-landlord conflicts. They leveraged threatening a variety of things in order to be heard; most notably shutting off fuel supplies and expulsion from real estate boards.

Most people's assumptions of rent control come from the 1940's which was the period of first-generation rent control. The Emergency Price Control Act of 1942 was a U.S. statute which was passed and imposed an economic intervention as a restrictive measure to control inflationary spiraling and pricing elasticity of goods and services while providing economic efficiency to support the United States national defense and security. The statute included rent control laws which were

tied to buildings constructed before a certain year, and restricted landlords from raising rents or evicting a tenant as long as the tenant remained or passed on the apartment, the rent could not increase. The state enacted these laws post-depression because while the Great Depression kept rental rates low, as the economy came out of recession demand increased. The rent freeze covered approximately 80% of the nation's rental housing stock, and lasted through the 1940's. In 1951 the federal rent control program was set to be phased out. This was due to a housing boom where most cities abandoned the strict rent control laws. The only state that adopted its own similar system to keep some version of rent control in place was New York.

The '60s and '70s saw a resurgence of rent control laws that are called second-generation, or rent-stabilization, laws. Rent regulation measures came in conjunction with another international conflict. This period's rental regulation came in the form of rent stabilization. President Richard Nixon instituted a wage and price control program called the Economic Stabilization Act of 1970, from August of 1971 to January of 1973 with the intent of easing the rapid inflation accompanying the Vietnam conflict. It included a rent stabilization element that tenants found appealing. The late 1970's saw a resurgence as rent regulation campaigns re-emerged as a result of the ongoing inflation from the oil crisis and increased political activism. This second generation of rent regulations typically permitted an automatic percent rent increase, included vacancy decontrol, had some units unregulated based upon age, and allowed landlords to petition to pass some of the costs of capital improvements and building remodels onto the tenants.

## **IDEOLOGIES**

The institution of rental regulations has had proponents and opponents throughout history. The general arguments against rental regulations come in the form of economics; which view it as an insufficient way to manage the issues between supply and demand. The other argument is in favor of rental regulations and regularly cites societal good derived from the presence of rental regulation. These two arguments are, then, generally along political lines; which tends to mean there is political struggle over the subject in any city, county, and state. In this section we will discuss the two broad positions on rental regulations.

## ECONOMIC LENSE

In a competitive market, it is assumed that demand will cause an increase in supply. In a market without controls on prices, if the amount demanded is larger than the amount supplied, prices rise to eliminate the shortage through bringing forth new supply and by reducing the amount demanded by price increase. This means that the market is answering the needs of the population. If a price control is instituted then the literature cites an array of issues arising.

The first of those is a loss in the number of housing developments being constructed. This is due in part to the fact that in an unregulated market there is a potential to make great returns on a real estate investment, but in a regulated one it becomes more difficult; thus shifting development from residential to commercial. Further, because most rent regulations exclude new buildings from the rent regulation laws, developers mostly choose to produce higher end units for the luxury market, causing only rich people to see an increase in supply, and the developers to also increase their earnings. There is also a hypothesised effect on the units that have already been built; due to a reduced ability to make a profit the owner or landlord may choose to allow units to go in disrepair, and halt renovations. Thus, people in the lower and middle classes begin experiencing deteriorated housing, with no new units entering the market. The people who are able to get a rent controlled unit, know that they must hold onto it, as most rent regulations prohibit vacancy decontrol and allow a unit to be priced at market value when a tenant leaves. This causes hoarding; tenants know that if they stay put they will be able to pay about the same rent, with capped increases for a long time, which in turn limits the supply for new renters even more. This isn't as large of an issue in states such as Oregon, who's rental cap is very high and which does not cause this hoarding mentality because the rental increases are fairly normal to what the market would provide. Dysregulation of the housing units is another way in which the supply will dwindle. Due to lowered profits, landlords will take housing off the market through various loopholes including but not limited to using the entire building as a residence for a certain number of years. Rent control can cause discrimination because if there are more applicants the landlord has an incentive to choose tenants based on other factors. A landlord may more carefully examine applicant's credit history and income, which is a standard practice, but could lead to biases against younger applicants; further landlords may not rent to all races, may prefer young women, and dislike families. Thus, rent control could exacerbate segregation problems because landlords choose not to rent to people who would change the demographics of an area.

To take a citywide lense on the issue rent control can be seen to limit mobility. Duration of residence in rent controlled apartments has been seen to be three times as long as duration in market rate apartments; thus the incentive to hoard acts also as a disincentive to relocate. This immobility can drastically hamper residents to relocate closer to better employment. This in turn has effects on regional growth and adaptation. The limited supply of housing makes it harder for a newcomer, who is in search of a place to live, but also acts as a powerful disincentive for businesses to locate here due to the inability to attract skilled workers. Employers may then decide to relocate to other cities, if their recruits cannot find consistent good housing. This lowers the city and regions attractiveness and ability to take in tax revenues; halting growth. Further issues surrounding taxes include rent control reducing the market value of regulated rental property, this negatively affects the assessed property value relative to unregulated properties, decreasing overall property tax revenues and burdening market properties disproportionately; which in turn acts as further disincentive to develop.

## SOCIAL LENSE

The societal arguments question all the above statements and look at the social response to rent control. The philosophy behind rent control is repositioned in this argument; it is seen as a way to protect the moral rights of occupancy, and that long-term tenants who contribute to the neighborhood being a desirable place to live have a legitimate interest in staying in their apartments. This argument falls in line with ideas of anti-displacement and how to reduce gentrification of neighborhoods and cities. The societal lense postulates that renters are often maligned for not investing in their neighborhoods or houses; as well as an inherent asymmetry in power between the tenant class and the landlord and development class.

A main argument is that when rent control is discussed the automatic assumption is that there is a hard ceiling on rent control, with a very low percent increase allowed. This is the typical economic model which presents the aforementioned ideas, and leads to development fleeing the city. The reality of most new rent regulations is that they are rent stabilization measures; and are aimed mostly as anti-gouging methods. This inherently means that the ceilings are not as low, and the measure is there more as a preventive way of decreasing the gentrification of a neighborhood, city, state, or region. This argument suggests that renters who have a better sense of stability in their neighborhoods and homes would take more care to become invested in both. The economic argument that demand will drive supply is also questioned; in tight markets with restrictive zoning codes, exploitative development fees, and little to no affordable housing measures such as bonds will not see the positive side of all the demand; rather prices will continue to rise in a way that puts the renter in an increasingly worse position. Rental rate exploitation thrives in those markets; as the ability to charge higher is a simple decision, but the ability to afford those higher rents may be unattainable.

These two arguments play out across all cities, states, and regions that consider rent control. The historical precedence of rent control shows that it is usually instituted in dire circumstances, where the popular good is the primary objective. In order for rent control to be passed there tends to be a large civic movement and support from non-profits, for-profits, and leaders in politics. This dynamic conversation is constantly evolving as the affordable and missing middle housing crisis continues in the United States. Below the paper reviews state histories and the current rent control policies enacted in New York, California, Oregon, Arizona, Colorado, Nevada, and Washington.

## STATE HISTORY AND PRESENT

### NEW YORK: HISTORICAL PRECEDENT

New York City's rent control program is the longest running in the United States. It began with the Fair Rent campaign; people were frustrated with the predatory landlords in the city after World War I, leading to major rent strikes that led to stabilization that lasted nearly a decade but ended when it was determined the rent "emergency" was over. In the 1940's the rent freeze went into effect on a federal level, but once it was phased out federally, New York adopted its own similar rent control in its place. There were some limited deregulations for high-rent luxury units, but the vast majority of New York rental units were rent controlled during this time. There are fewer than 30,000 rent-controlled units left in the city from this first generation of rent regulation. The rent stabilization period came in 1960, and was enacted by Mayor John Lindsay due to dropping vacancy rates and widespread complaints of unchecked price increases. The new law covered units built between 1947 and 1969. Rent stabilization was envisioned as a more flexible and market-friendly version of rent regulation than rent control. The key difference was that under rent control the tenants right to stay in their apartment was not governed by a private contract between landlord and tenant (lease) but rather it was a matter of state law. Therefore, the right to stay in the apartment was based on the state statute, not a lease which the landlord could choose to renew or not. Rent stabilization allowed for automatic yearly increases. The law initially prescribed rent increases of no more than 10% for a 2 year lease, and 15% for a 3 year lease. The rent stabilization law was effective in keeping most rental units in the city controlled or regulated, and most tenants could expect secure tenancy without worrying about rent gouging.

This ended in the 1970's when the legislature passed "vacancy decontrol"; which mandated that any stabilized or controlled unit that became vacant immediately be deregulated. It was intended to be the slow death of rent control; as the whole city would slowly return to a market rate. The bill also enabled Urstadt Law, which prohibited cities and other local governments from enacting any rent regulation that was stricter than the state law.

The Emergency Tenant Protection Act of 1974 brought those percentages down. The rent stabilization in New York today is still based on that law. The EPTA immediately ended vacancy decontrol and placed all units that had been deregulated back under rent stabilization. The entire premise for New York's rent stabilization laws is based on vacancy rates being at a crisis level, and that they may be lifted if the crisis abates; but that has not happened, and is doubted to ever occur .

This has left a legacy in New York; where units in buildings with 6 or more apartments built before 1974 are generally rent stabilized. The rent laws have been adjusted a number of times, and in some cases for the better. In 1984 the Omnibus Housing Act brought the whole system under state administration and strengthened tenant protections through rent registration. During 1974-1993 tenants in New York enjoyed the right to a lease renewal and rent increases that were capped by the rent guidelines board. Things began to change in 1993 when the state legislature renewed rent regulation, but allowed landlords to deregulate vacant apartments that had a legal rent over \$2000; this was then codified into state law in 1994. The 1994 vacancy deregulation allowed a slow, but eventually dramatic and precipitous decline in the amount of rent regulated housing in New York.

## WEST COAST

### CALIFORNIA: THE INCUBATOR

In this section we will discuss California, who has been an incubator for rent control laws. Each county, city, and the state went through the first two phases of rent control laws; here we pick up in Sacramento, San Francisco, and Los Angeles during the rent stabilization era, which sets the context for modern-day regulations in these cities and the state. Many cities in California including Santa Monica (1979), East Palo Alto (1986, 2010), and Berkeley (1980) as well as city council ordinance, including in Beverly Hills (1978), Hayward (1979), San Jose (1979), and West Hollywood (1985) passed rent control regulations both through ballot measures and City. We then dive into the statewide measures, which do not preempt the local measures if those measures are more stringent than the statewide measure.

### SAN FRANCISCO

San Francisco enacted rent control in 1979, with Mayor Dianne Feinstein. There was political pressure to pass such a law due to high inflation rates nationwide, strong housing demand in San Francisco, and the recently passed Proposition 13, which limited annual property tax increase for owners. Due to political lobbying, many tenants believed that the benefits from that would be passed down to renters, and when this wasn't realized political pressure increased tenfold. The 1979 rent control law capped annual nominal rent increases to 7%, and covered all units built before June 13th, 1979 that had 4 units or less. The small multi-family buildings made up around 30% of the rental housing stock in 1990. The law focused on the small multi-family buildings because it was believed they were not as profit driven as the larger scale corporate landlords, and were more similar to the renters; therefore they pushed back less. Though well intended, a loophole was found, and large corporations purchased the small multi-family buildings. This caused a new ballot initiative in 1994, which removed the small multi-family exemption. The ballot barely passed. It stipulated that beginning in 1995, all multifamily structures built prior to 1980 remain rent controlled today, while all those built from 1980 or later were not subject to rent control.

### LOS ANGELES

Los Angeles experienced a “bull market” in their single family housing market running from January 1975 to September 1980, where the overall rate of increase in home prices for all of Los Angeles County, adjusted for inflation, was 69%. These increased home values quickly translated to large increases in property tax bills. This kindled a bicentennial tax rebellion, which rolled property tax assessments back to their 1979 values through Proposition 13. The rent control movement, similarly to San Francisco, occurred before this and was sparked by the reaction from property owners who raised rents to try and make a profit even with the new property taxes. Los Angeles went through a battle to get rent control in place. They were defeated in 1976, 1977, until it passed in 1979 with a rollback and moratorium on rent increases was approved, and the City of Los Angeles enacted a one-year-only Rent Stabilization Ordinance (RSO), which was renewed annually until April 1982 when it was made permanent. The RSO sought to balance the needs of the renters and the landlords by allowing rents to rise annually, in accordance with limits the city put in place, as well as the allowance to increase rents for capital improvements, various utilities, and special needs. When a tenant moves, the landlord may then raise the rent to market-price rent, through vacancy control/decontrol. Some units were excluded, such as single family homes, luxury units, and apartments built since the ordinance went into effect in October 1978. The ordinance has gone through many amendments to keep up with the times, and address both landlord and tenant interests.

## SACRAMENTO

The Sacramento Tenant Protection and Relief Act went into effect September 2019. The protections apply to all renters in Sacramento who live in apartments, duplexes, mobile home parks, and single room occupancy hotels built prior to February 1st 1995. It applies to tenants who signed leases that are month-to-month or longer. The law also put into effect restrictions around evictions. All tenants who had been living in their unit for more than a year cannot be evicted unless they stop paying rent, are charged with a crime, are illegally selling drugs, fail to give landlords access to the units, or otherwise violate their leases. The bill that was passed was in part supported because it was a softer and less costly measure than a ballot approved for March 3, 2020; which had received 44,000 signatures. That ballot was led by Housing4Sacramento and would have been more restrictive than the bill that was passed. The ballot measure would prohibit a rent increase of more than 5%, with inflation not factored in. It would also create an elected rental housing board that would operate independently of the city; the board would have the power to determine the annual rent adjustment. Further, if a landlord wants to do substantial repairs, owner-occupy, take the unit off the housing market or demolish it they would need to pay at least \$5,500 to displaced residents. Other activists are still supporting this measure and reject the city's version. Activists do not approve of the back door proceedings of the bill that was passed, and believe that it is the opposite of open and transparent government.

## STATE

The Costa-Hawkins Rental Housing Act, a California state law, was enacted in 1995. It placed limits on municipal rent control ordinances. It prohibited cities from establishing rent control over certain kinds of residential units, ie. single family dwellings, condominiums, and newly constructed apartment units. It also prohibited "vacancy decontrol", also called "strict" rent control. Vacancy decontrol denies or limits an owner's ability to increase rent to new tenants. This state law was enacted to manage the power of California cities to regulate their rental markets.

California has been experiencing extreme pressure in its housing market and is experiencing a housing crisis; that has created political pressure. In 2016 McKinsey & Co. estimated that California needed around 3.5 million more homes by the middle of the next decade. This is in part due to the longest economic expansion in history, where the U.S. has been building far fewer houses than it usually does, and pushing prices further out of reach for vast portions of the population. Housing has become a lower and middle class problem in California. The local jurisdiction in California holds a very large ability to sway what gets built. NIMBYism is rampant, and many developments get stalled. To make this issue worse, the planning and zoning do not allow for the densification that needs to occur; for example, ¾ of the residential land in Los Angeles is restricted to single-family homes, and as much as 95% in San Jose according to UrbanFootPrint. As people are pushed further out, there are severe environmental consequences, and residents are residing in forest fire prone areas.

To address all of this, in 2019, there were roughly 200 bills that addressed the state's worsening housing crisis. Most of those bills got nixed by the end of May. Some people refer to this period as the worst month in California's housing policy history. The bills that lost were widespread; assembly bill 1706, which was a proposal to provide incentives for developers to build middle income housing

in the Bay area, and Assembly Bill 1481 which would have extended “just cause” protections which would prevent frivolous evictions for all California rents was dismissed with a vote, and many never even reached the floor. Among the other losses was Senate Bill 5, which was designed to fill in the affordable housing gap created by the dissolution of redevelopment agencies was vetoed on Governor Gavin Newsom’s desk, and Senate Bill 50, which would have done away with some zoning limits to allow for taller, denser housing near mass transit and job centers was banished and is ineligible for a vote until 2020.

Though many bills died, some lived on; including Assembly Bill 1482, the Tenant protection Act of 2019. The bill is designed to prevent the most egregious rent hikes across California, and is effectively the second statewide rent control law passed. The rent control only allows landlords to increase rents by 5% plus inflation each year until 2030, it retroactively applies to increases on or after May 15th, and it bans landlords from evicting tenants without cause. In an attempt to satisfy both parties, pro-and-anti rent control lobbyists, lawmakers wrote in exemptions that drew key support or repelled deadly opposition to the bill. Through the exemption of buildings constructed in the last 15 years, with a rolling date, building trade unions afraid of losing contracts declined to oppose the bill, as did the California Building Industry Association, which represents developers. Through pledging to exempt single-family rental homes not owned by corporations, law makers kept the California Association of Realtors off their backs, though they ended up opposing the bill in the long run. As in Oregon, to help satisfy the tenants groups, lawmakers also tied rent stabilization to a just-cause eviction proposal. In the end the finer details of the exact percentage of the rent cap was determined by Governor Newsom who sat down and negotiated with the California Apartment Association. As the following quote states they “Wanted to strike a balance between tenants having some predictability and allowing landlords to earn a fair rate of return, and that number was a number that the apartment associations did not oppose because they agreed it reflected a balance. That ended up being the sweet spot and the magic number that got this done.” Further stipulations included the bill not overriding local rent control laws. Counties such as San Diego, who have never had a countywide rent cap, will have to institute rent control for the first time. The rent control law does cover units that are not already covered. If the landlord wants to convert the apartments into condos or substantially remodel the property, then they will have to pay relocation fees equal to one month of rent. California’s statewide rent control will last 10 years, and then it will be up for renewal.

## OREGON

In 2015, a tenants activist group called the Community Alliance of Tenants (CAT), in Oregon, announced a Renters State of Emergency. This became the catalyst for Senate Bill 608. Signed on February 28, 2019, created two major changes to the Oregon Residential Landlord Tenant Act by limiting the scope of termination notices without stated cause, and the implementation of a 7% plus inflation rental increase cap. The cap is calculated using the consumer price index for western states as the measure of inflation; each year in September, state economists will calculate the rent increase cap for the next Calendar year. The bill exempts new housing (anything built in the last 15 years) and subsidized housing. If a unit is vacant the landlords are free to raise rents if tenants leave of their own accord; if the tenant is evicted without cause or their lease is not renewed after the first year,

the rent increase cap stays in place. Executive Director, Katrina Holland, stated that success in getting the bill passed lies in building a diverse coalition of supporters who educated their members on the issues and who lobbied the statehouse hard throughout the process. Their agenda was named “Fair Shot”, and included the Urban League, Asian Pacific Network of Oregon, immigrants rights groups, trans rights groups, caregivers, and labor unions such as the service workers, grocers, teachers, and government employees. They attributed the bill being passed by the multi-sectoral coalition that drove the narrative that doing nothing was not an option, and repeating the mantra of the trifecta: protect tenants from being evicted, preserve affordable housing, and produce new housing.

#### ARIZONA, COLORADO, NEVADA, WASHINGTON

Arizona’s state law A.R.S 33-1329, gives the state the sole power to control rents on private residential property. Cities and towns are precluded from the imposition of rent control.

Since 1981 Colorado has had a statewide ban on rent control policies; it was enacted in response to a citizen initiative in Boulder to allow rent-controlled housing. Due to Colorado's massive influx of residents, housing has become exorbitantly expensive. Demand is consistently outpacing supply; causing the average cost of renting to increase from \$820 to \$1410. Senate Bill 19-225 attempted to dismantle the statewide ban on rent control policies. It would have given governments a tool to rein in rents; with an amendment stating “it does not create, and is not intended to create a statewide rent control policy”.The bill did not pass the 2019 legislative session.

In 2019 Nevada had several proposals go to the Senate to address home prices, homelessness surge, and a dwindling inventory of affordable housing for the state's poorest. Senator Julia Ratti, took up the crusade for these measures during Nevada’s latest legislative session. Several measures went before the legislature; SB 448, SB 398, SB 256, SB 103, SB 104, SB 473, SB 425.

SB 448 would create a four year pilot project that would provide up to \$10 million in annual, state approved tax credits for builders of rent restricted housing units; experts predict this would boost the affordable housing output by 60-80%. The tax credits would also be able to apply to renovating existing affordable housing, raising concerns that developers may just use the bill to renovate. SB 398 would give cities and counties the freedom to come up with their own solutions to combat the housing crisis, up to and including rent control. The bill allows builders to buy their way out of certain affordable housing mandates with a fee paid to local governments, and amendment to this requires officials to use those fees to develop low income units. SB 256 sought to prevent landlords from evicting tenants on the basis of late fees, allowing the tenant a chance to request a chance to fix issues that could cause them to lose part of their security deposit, and gives renters 5 days to gather their items before being evicted. SB 151 would make landlords wait longer (7 days) before evicting a tenant, removing the ability to evict 5 days after the renter received a notice of default. SB 74 would allow either the tenant or the landlord to appeal an eviction order. SB 103 would allow local governments to slash or eliminate fees charged to affordable housing developers. Supporters say eliminating fewer, impact and permitting charges would expedite much-needed construction of new low-income units. SB 104 sought to expand the scope of an existing low-income housing database. SB 473 was a

clean up bill that sought to clarify and expand the state's definition of affordable housing to include housing attainable by individuals making up to 120% of their country's gross median income. The laws passed include SB 256, 448, 151. The rent control bill was effectively blocked.

Washington has experienced a 31% increase in “cost burdened” renters since 2000. Washington’s state law requires 30 days written notice to change a term of tenancy, but requires 60 days written notice for any rent increase. The city of Seattle has a law where a tenant is entitled to 60 days prior notice for an increase of 10% or more in a 12-month period. Rent control is illegal in Washington according to RCW 35.21.830; meaning landlords can raise rent as much as they want as long as they comply with the appropriate notice period and have not issued the notice to discriminate or retaliate against the tenant. Tacoma has TMC 1.95, enacted November 2018. It aims to protect tenants and give specific guidance to landlords who operate residential rental businesses in Tacoma. The requirements for landlords are as following: 120-day notice to vacate and relocation assistance for low-income tenants when a landlord intends to change use, rehabilitate substantially, or demolish a dwelling unit, 60-day notice to vacate for no-cause termination of tenancy, 60-day notice requirement for rental increases, and a requirement that landlords distribute information about tenant rights as well as landlord-tenant responsibilities. The new tenant protections included prohibiting retaliation against tenants for exercising their rights under RCW 59.18, allows installation payments for various deposits and fees, codification of relocation assistance when the city declares a building uninhabitable, provides relocation assistance for qualifying termination of tenancy of low-income tenants, and allows tenants to file a complaint for the City of Tacoma to investigate and enforce code.

## **CONCLUSION**

States' response to the housing crisis is varied, and the choice to institute rental regulations is diverse. The above discussion of the topic aimed at describing the historical evolution of rental regulations, explaining current ideological beliefs surrounding the topic, as well as historical and current choices on rental regulations. The implications of rent control in Oregon and California will play out over the coming years; and hopefully inform future decisions around addressing affordability for all in the housing market. As urban areas grow there may be more incentive and political push to come up with a market and socially conscious plan.