

Opportunity Zones

Wisconsin

June 11, 2026



Today's Agenda

- Introductions
- HUD Updates
- Overview of Opportunity Zones
- Roundtable on Opportunity Zones



HUD'S MISSION AND FPM MISSION ALIGNMENT



HUD's Mission

The mission of the U.S. Department of Housing and Urban Development is to foster strong communities by supporting access to quality, affordable housing, expanding the housing supply, and unlocking homeownership opportunities for the American people. The Department is committed to furthering the promise of self-sufficiency in every American while promoting economic development to revitalize rural, tribal, and urban communities across the country.



HUD'S Office of Field Policy and Management's Mission Alignment

FPM advances HUD's mission by ensuring the effective coordination and implementation of HUD's policies, programs, and stakeholder engagement efforts in the field. FPM serves as the Department's connective tissue by translating national priorities into localized impact and ensuring that underserved communities, including rural, Tribal, and urban populations receive meaningful access to HUD's resources and reforms.

HUD's Strategic Plan



REDUCE BARRIERS TO
AFFORDABLE HOUSING



REDUCE
HOMELESSNESS



PROTECT TAXPAYER
FUNDS



STREAMLINE BUSINESS
PRACTICES

Regional and Field Office Initiatives

Opportunity Zone
(OZ) Outreach

Regulatory
Streamlining &
Resource Alignment

Veterans
Homelessness
Initiatives

Faith-Based Initiatives

Fraud Prevention
Strategies

Housing, Health &
Employment Service
Coordination

Technical Assistance
(Housing, Economic &
Rural Development,
Infrastructure)

Public Stakeholder
Engagement



Programs of HUD

- Community and Planning Development
 - Entitlement Programs (CDBG, HOME, Emergency Solutions Grant)
 - Continuum of Care (COC) Homelessness Grants
 - Significant reforms to recalibrate competition
 - Increased focus on transitional housing, support services, and accountability
- Public and Indian Housing
 - Focus on self-sufficiency in public housing (Work and Dignity Coalition)
 - Ensure eligibility for public housing and subsidy
 - Redevelop and improve current housing stock
 - Foster Youth to Independence
- Housing (FHA & Multi-family)
 - Improve through reforms lending process (environmental)
 - Review troubled assets for safe and secure housing
- Center for Faith
 - Encourage faith organizations to be part of the solution (already are)
 - Look to excess church properties for development

HUD Key Initiatives

- Work and Dignity Coalition
 - a member of the Department of Housing and Urban Development's Work and Dignity Coalition affirms its support for advancing the principles of work, opportunity, and self sufficiency for assisted households.
 - Target Public Housing Authorities, Landlords, non-profits, Faith based organizations, local governments, and Tribes
- Barriers to Housing Affordability Roundtables
 - Two recent executive orders on housing affordability
 - Roundtables coming on local/market barriers to affordability
 - [State and Local Best Practices for Home Construction](#)
- Opportunity Zones Roundtables
 - Designation Process for Wisconsin
 - Best Practices

Opportunity Zones

Provide a series of ***federal capital gains tax incentives*** to qualifying investment into designated qualifying low-income communities (census tracts)

Largest community and economic development program in U.S. history

Opportunity Zones Tax Benefits

- **Tax Deferral:** Delay payment of taxes on capital gains rolled into a Qualified Opportunity Fund (QOF) that invests in a designated Opportunity Zone
- **Partial Exclusion of Tax Deferral:** A discount (step-up in basis adjustment) for calculating the tax owed on the deferred capital gain
- **Exclusion of Additional Gains:** No tax liability due on additional capital gains for qualifying investments in OZ held for 10 or more years

What Are Opportunity Zones?

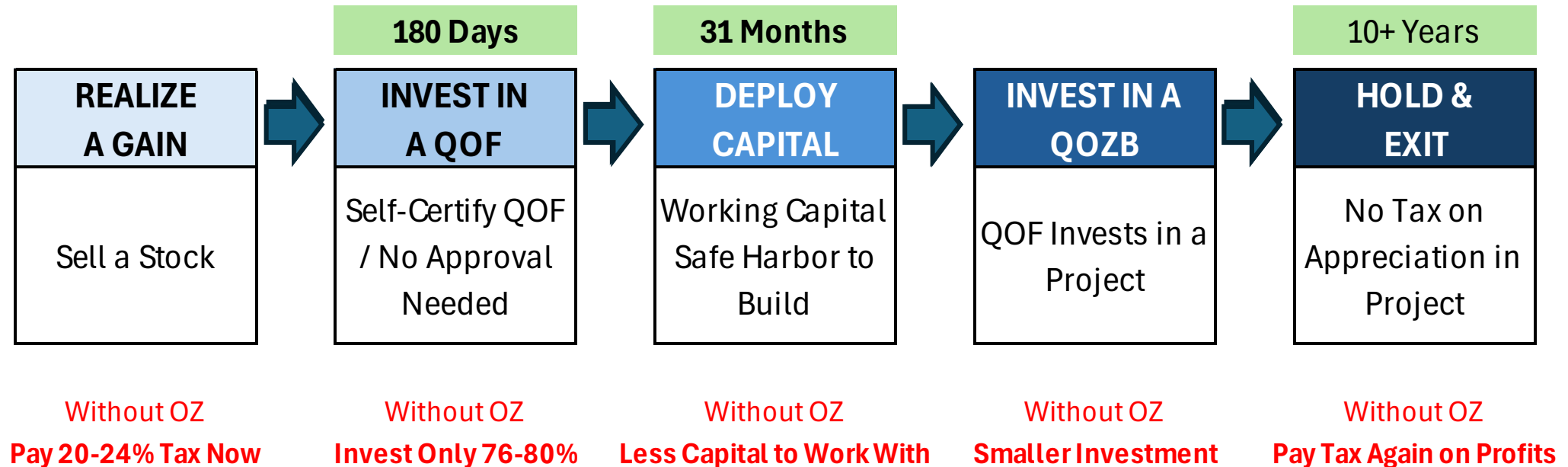
- Created under 2017 federal tax law
- Census tracts designated by governors from eligible list
- 8,764 Census tracts certified and designated by U.S. Treasury
- Designed to encourage long-term private investment
- Made permanent under 2025 federal tax law

Opportunity Zones Accomplishments

- Through 2020
 - Over \$100 billion invested in communities
 - Over 50% of OZ census tracts have had investment
- Investments in commercial and industrial real estate, hospitality, housing, public infrastructure, energy developments along with business start-ups and expansions
- 400,000 housing units built because of the OZ incentive
- Federal, state, and local grant and program alignments
- Thousands of QOFs created
- Investments in thousands of projects and businesses

OPPORTUNITY ZONES: INTRODUCTION

Investment Timeframe and Actions Example



OPPORTUNITY ZONES: INTRODUCTION

Non-QOF versus QOF Investment Example

	NON-QOF INVESTMENT	QOF INVESTMENT	DIFFERENCES
ORIGINAL CAPITAL GAIN	\$1,000,000	\$1,000,000	
TAX RATE	30%	30%	
- TAX ON ORIGINAL CAPITAL GAIN	(\$300,000)	Deferred	Defer tax on Capital Gains
= INVESTABLE AMOUNT	\$700,000	\$1,000,000	\$300,000 more to invest
X <i>after tax</i> COMPOUNDED HYPOTHETICAL ANNUAL	8%	8%	
= RETURN APPRECIATION	\$811,247	\$1,156,925	\$345,678 more in asset value growth
- <i>over 10 years</i> TAX ON APPRECIATION	(\$243,374)	\$0	\$243,374 less in taxes paid
- <i>after 10 years</i> LONG-TERM CAPITAL GAINS TAXES PAID	\$0	(\$270,000)	\$30,000 less in taxes paid (includes 10% discount, paid later)
= <i>on original gain</i> FINAL VALUE	\$1,207,873	\$1,888,925	\$681,052 increase in value
<i>after 10 years, net of taxes paid</i>			

Hypothetical example provided for informational purposes only.

OZ Tax Incentives – New Law (2025) Structure

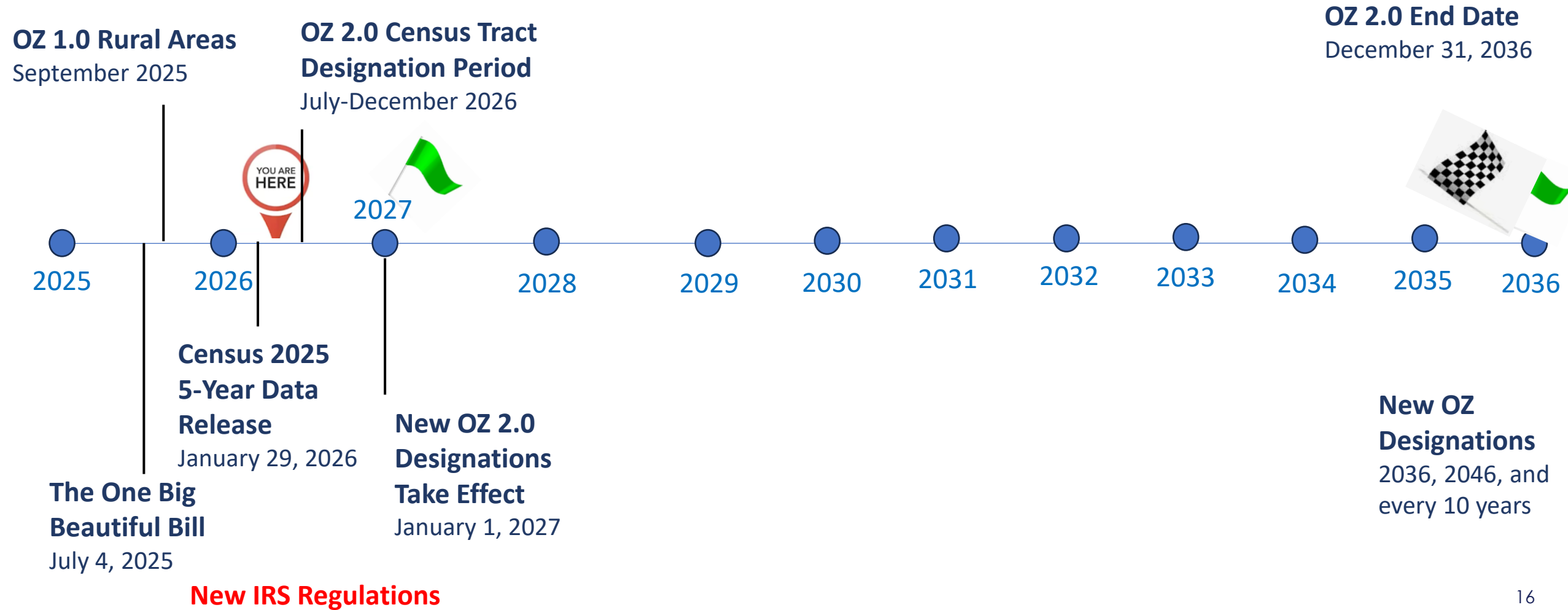
- Permanent part of tax code
- New OZ census tracts nominated by governors (September 2026)
 - Governors can nominate up to 25% of eligible tracts (minimum 25)
 - Eligible list criteria more restrictive than Original Law (2017)
 - Governors and communities work together for nominations
- Treasury to certify and designate new OZ census tracts (end of 2026)
 - Fewer OZ census tracts to be designated, more restrictive criteria
 - New OZ census tracts in effect on January 1, 2027, for 10 years
- OZ census tracts designated by Treasury every 10 years

OZ Tax Incentives – New Law (2025) Structure

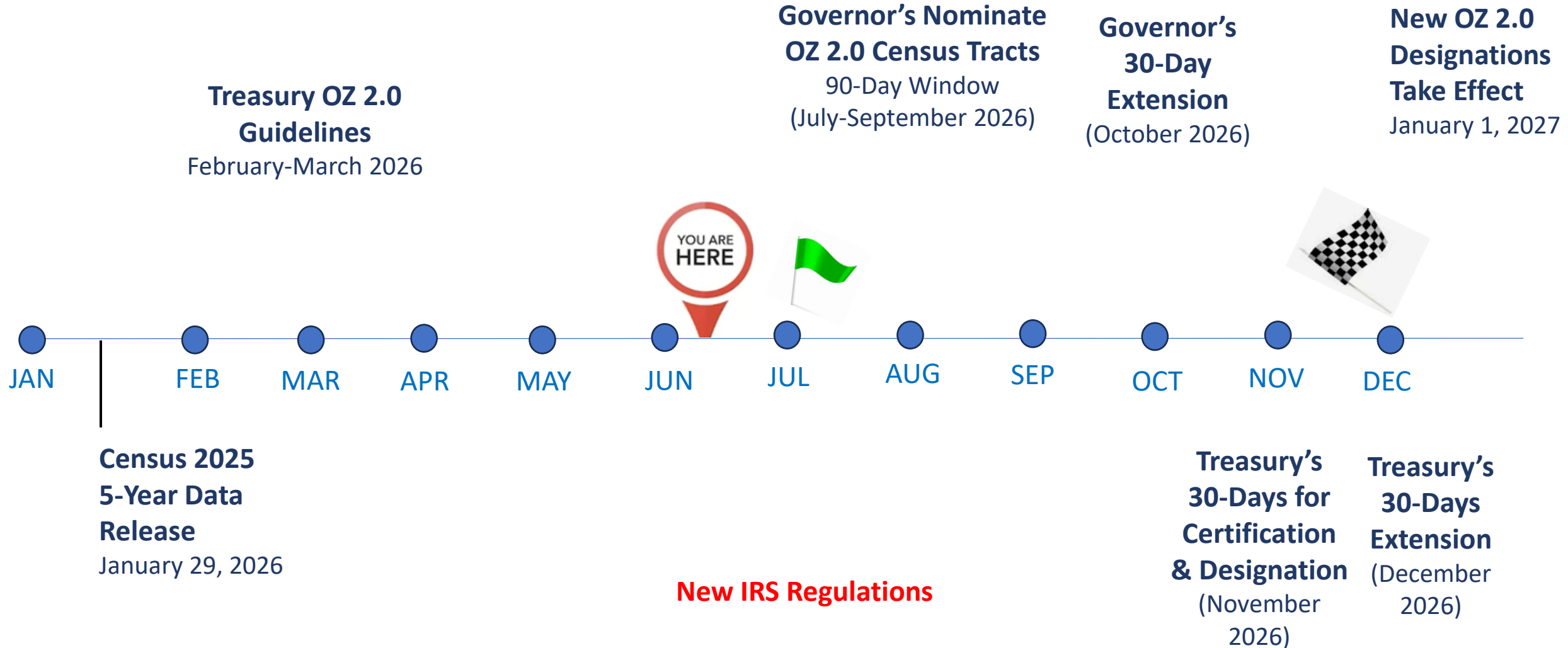
- Rural OZ Census Tracts
- New! Qualified Rural Opportunity Fund (QROF)
- Rural Incentives
 - 3 times step-up (30%) or discount in original gain
 - Half requirement for improving a property (50% substantial improvement test)
- Exclusion of appreciation after 10+ years
- No tax on post-investment gains if requirements met
- No depreciation recapture at exit

OPPORTUNITY ZONES 2.0 TIMELINE

OZ 1.0 Census Tracts
Expire / 2 Year Overlap
with OZ 2.0 Census
Tracts



OPPORTUNITY ZONES 2.0 TIMELINE



What Types of Projects Qualify?

- Community and Economic Development
 - Housing
 - Commercial (Office and Retail) Real Estate
 - Hospitals
 - Hospitality
 - Industrial and Manufacturing
 - Farming
 - and many others
- Operating Businesses
- Not “Sin” Businesses

Key Considerations

- Not a grant
- 2026 new OZ designation year
- Requires careful structuring
- Timing is critical (180-day rule)
- Compliance monitoring essential
- Preparing for reporting requirements

OPPORTUNITY ZONES 2.0: ELIGIBILITY MAP

OZ 2.0 Eligible Tracts (2020–2024 ACS Data)



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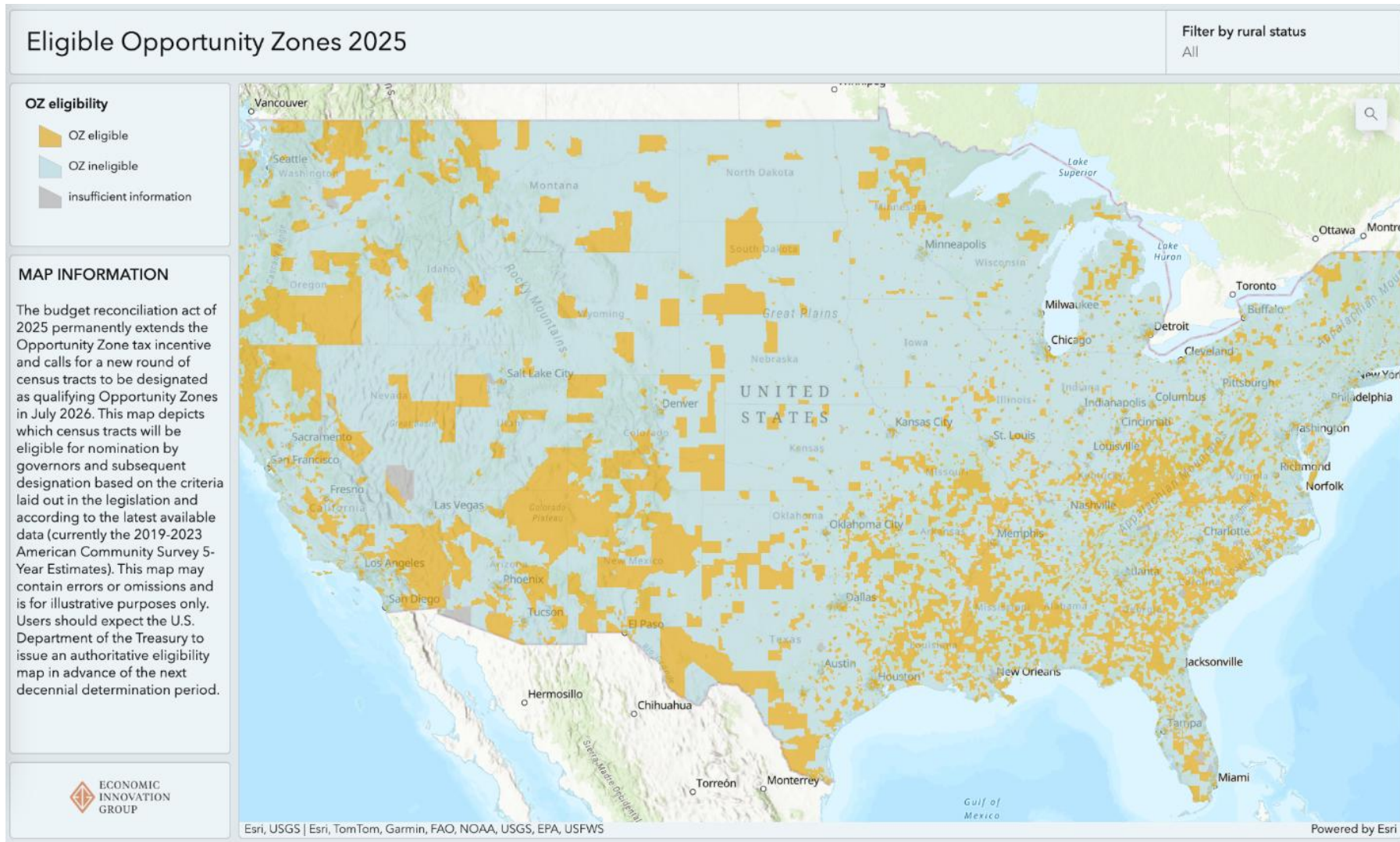


OpportunityZones.com created an interactive map of all eligible census tracts based on these criteria and the most current American Community Survey 5-Year Estimates for 2020-2024.

- OZ 2.0 Eligibility Data **(Google Sheets)**: [Open in Google Sheets](#)
- OZ 2.0 Eligibility Data **(Excel)**: [Download the Excel version \(.xlsx\)](#)

<https://opportunityzones.com/tools/oz-2-eligibility-map/>

OPPORTUNITY ZONES 2.0: ELIGIBILITY MAP



EIG created an interactive map of all eligible census tracts based on these criteria and the most current American Community Survey 5-Year Estimates for 2020-2024.

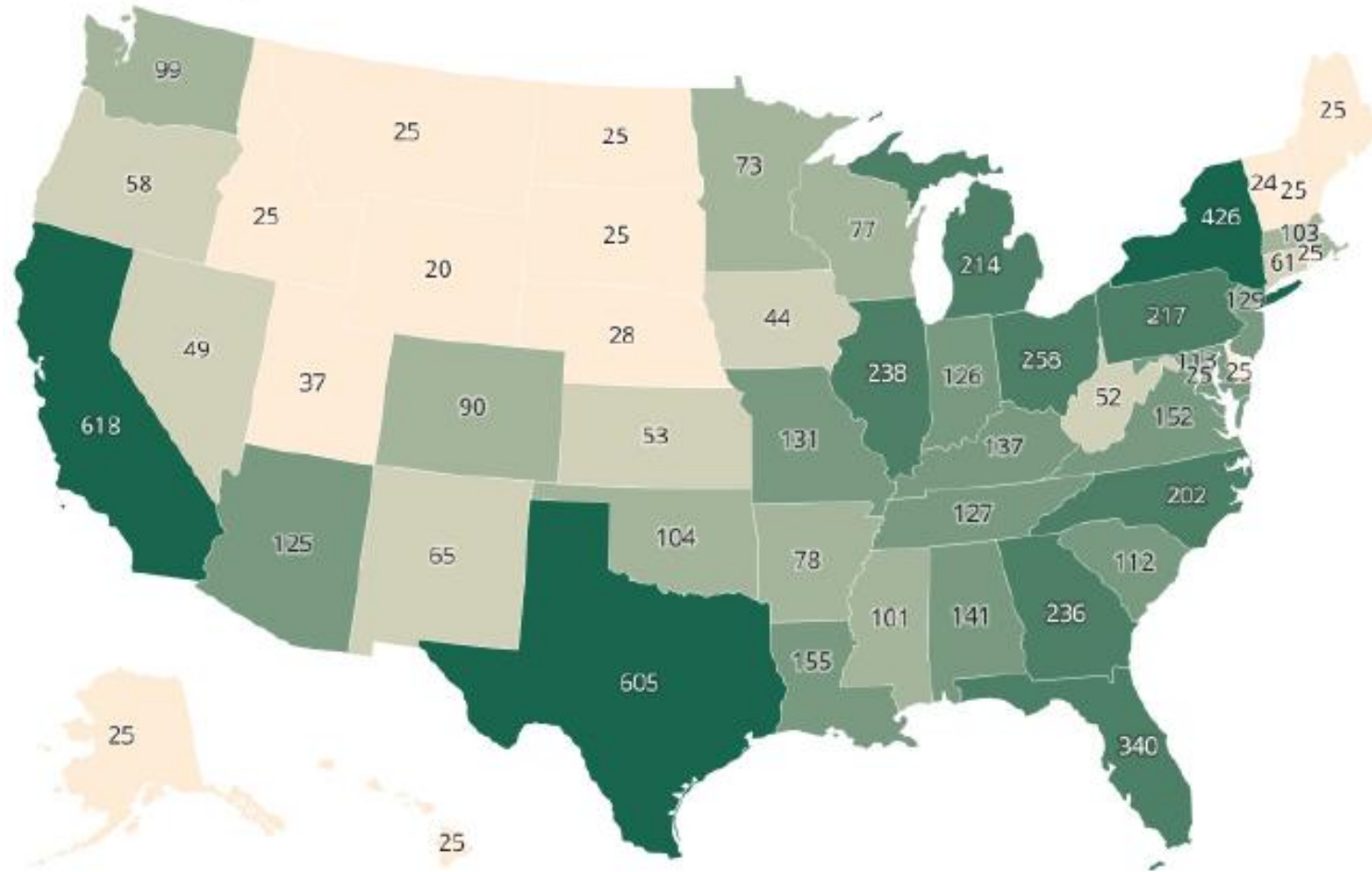
Some states will see large reduction in designations.

Some states will not see any change in the number due to the 25 minimum.

OPPORTUNITY ZONES 2.0: HIGHLIGHTS OF NEW OZ PROGRAM

Number of Expected Opportunity Zones by State

2026 designation cycle



Note: VT and WY have fewer than 25 eligible tracts, the minimum number of OZs guaranteed in statute. This map assumes they can designate all eligible tracts but no more. Final determinations rest with the U.S. Treasury.

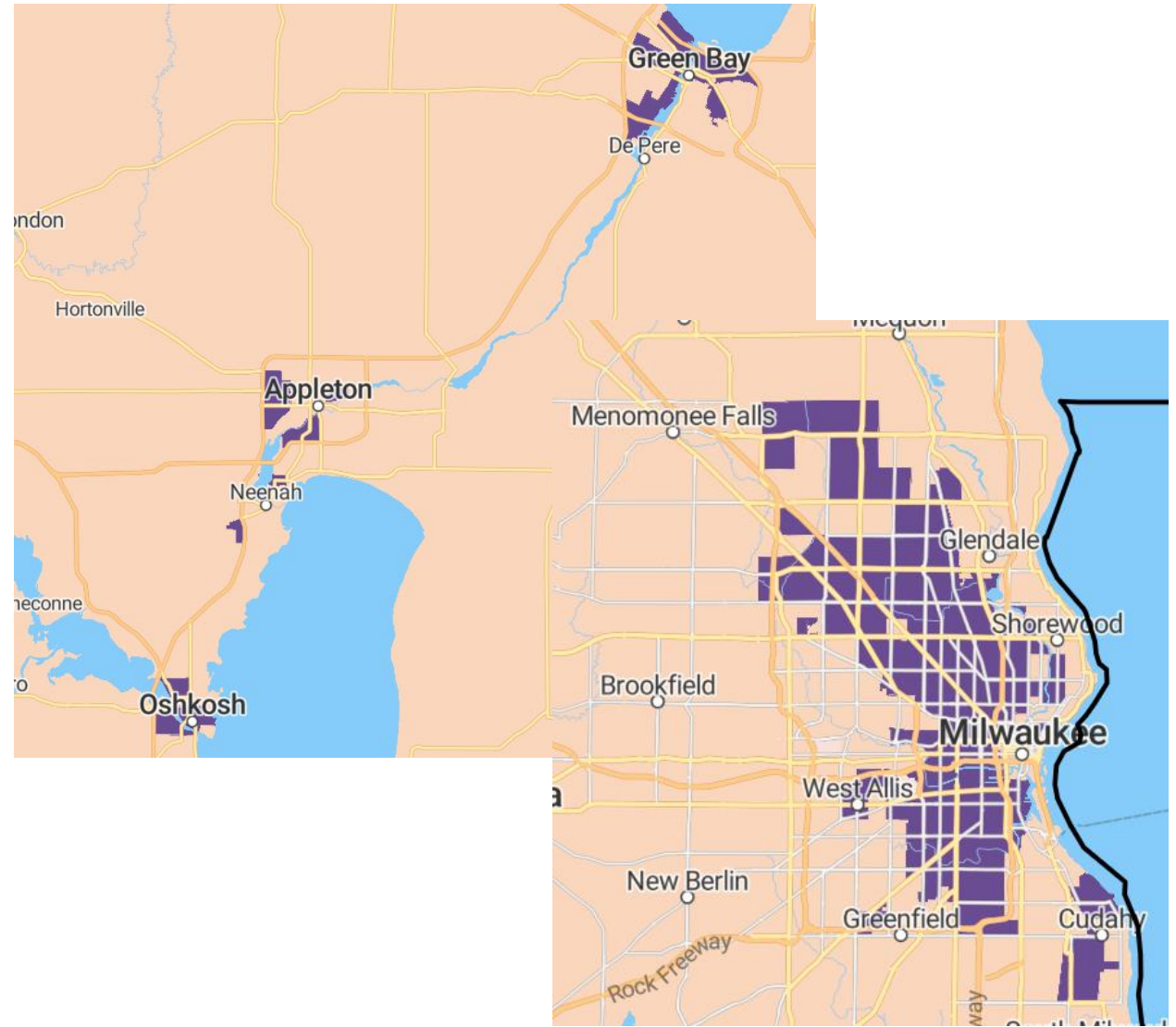
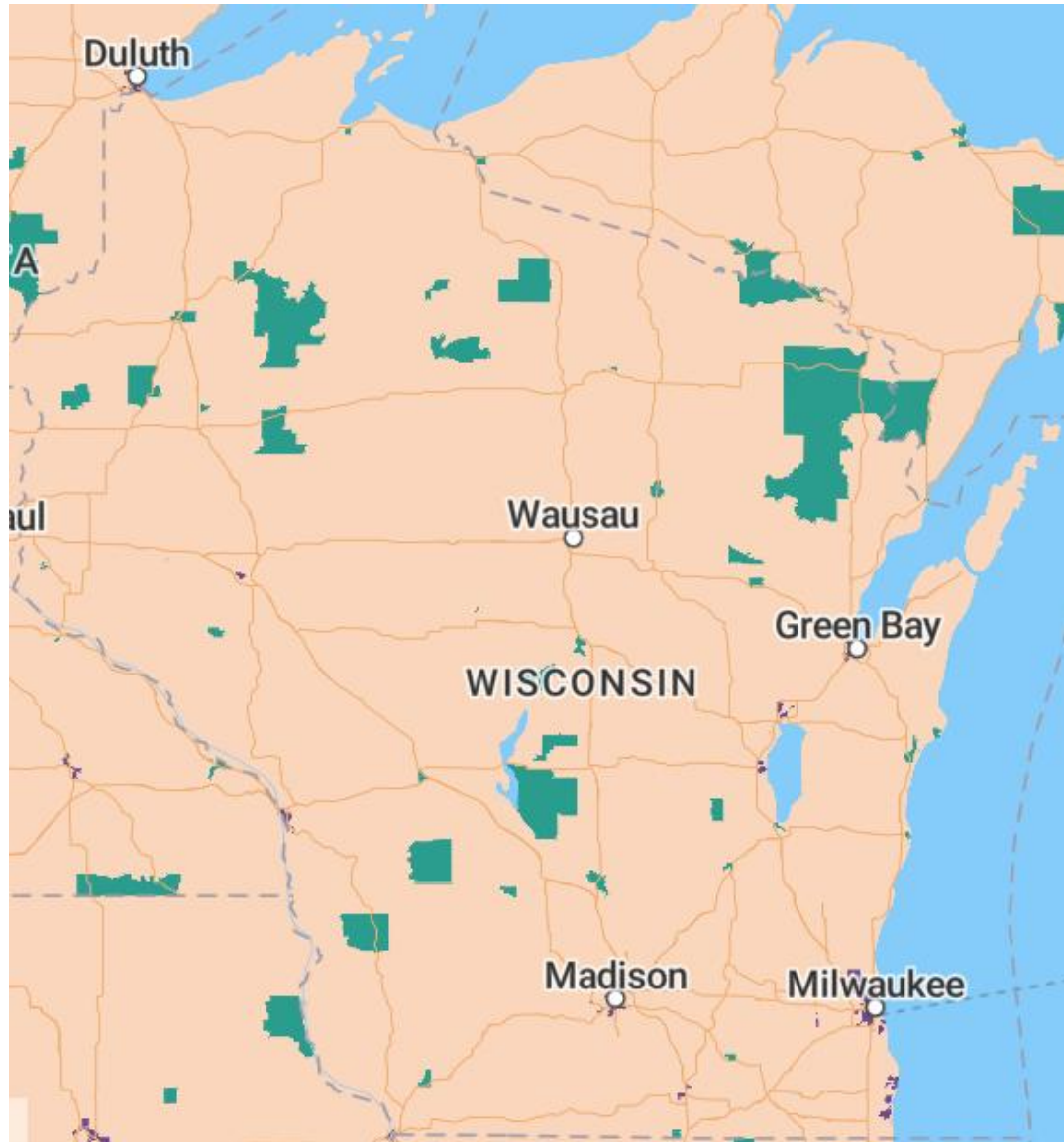
Source: 2020-2024 American Community Survey 5-Year Estimates



Using ACS 2020-2024 Data

- ~**20% fewer** OZ eligible tracts to nominate
- Designated OZ census tracts will **likely fall from 8,764 to 6,364**
- Disclaimer: Treasury has not yet released the OZ 2.0 guidance and data for eligibility

OPPORTUNITY ZONES 2.0: ELIGIBILITY MAP



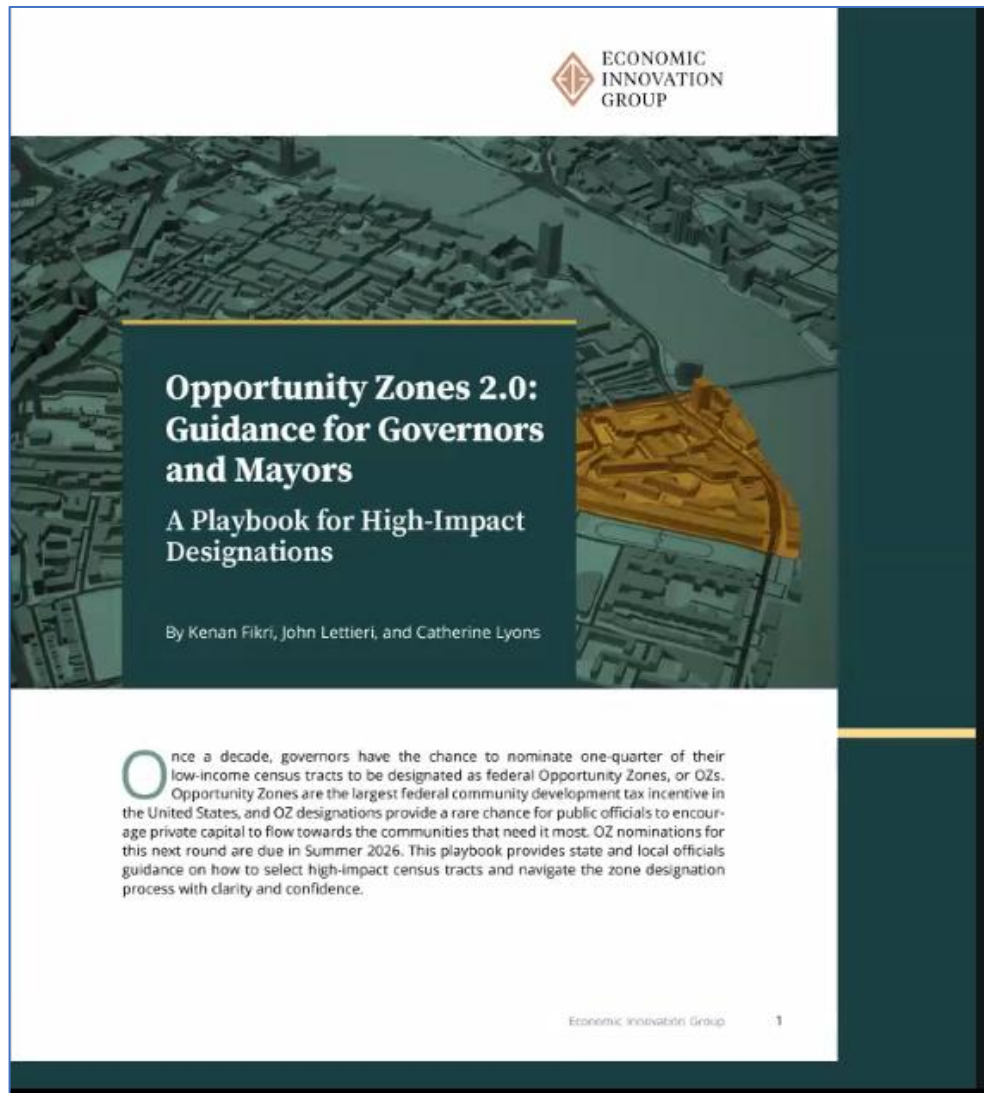
<https://www.policymap.com/embed/widget/12163/DNAOEK4MOFUIAGJCCEX7MVRX9IRWBIKG>

OPPORTUNITY ZONES: STATE UPDATES

OZ 2.0 State Activities Underway (Updated 3/29/26, if aware)

- Illinois – [Website](#), Webinars, and Nomination Portal
- Colorado – [Website](#), Webinars, and Nomination Guidance
- Idaho - [Website](#)
- Kentucky - [Webinar](#)
- Nebraska – [Press Release](#)
- Tennessee – Webinar and Regional Events (HUD Technical Assistance)
- Texas – [Website](#) and Nomination Guidance
- Missouri – [Fact Sheet](#) and [Webinar](#)
- California – [Webinar](#) (Postponed)
- Washington – [Website](#), Webinars, and Nomination Guidance
- Oregon – [Website](#), Webinars, and Nomination Guidance

OPPORTUNITY ZONES: EIG GUIDE FOR GOVERNORS AND MAYORS



Eight Principals for OZ 2.0

1. Get a **head start** preparing data and speaking with trust advisors now
2. Set a **vision** for how your state or community aims to harness OZ
3. Designate a **local coordinating entity** within state government
4. Engage **local partners** strategically
5. Balance economic **need** and investment potential
6. Combine both **quantitative and qualitative** insights
7. Embrace **purposeful transparency**
8. Align OZ nominations with supportive **policy goals**

OPPORTUNITY ZONES INDUSTRY UPDATES



December 1, 2025

ISSUE BRIEF | Economy & Trade

FROM POLICY TO PRACTICE: OPPORTUNITY ZONES 2.0 REFORMS AND A STATE BLUEPRINT FOR IMPACT

Jill Homan

TOPLINE POINTS

- ★ Opportunity Zones are a powerful, pro-growth tax incentive that has already driven more than \$85 billion of private investment into distressed communities across America as of 2022, and that number continues to climb.
- ★ The Working Families Tax Cut makes Opportunity Zones permanent and requires Governors to designate a new round of eligible low-income census tracts by July 1, 2026.
- ★ Governors should treat this designation process as a strategic opportunity: use transparent, data-driven criteria, engage communities early, and prioritize jurisdictions that are serious about reform and ready to grow.
- ★ States can supercharge the impact of Opportunity Zones by aligning their own tax codes with federal provisions and by enacting complementary reforms that reduce barriers to investment and development.

Introduction

Established in the Tax Cuts and Jobs Act of 2017 ([Public Law No. 115-97, 2017](#)), the Opportunity Zones (OZs) program is designed to spur economic development, job creation, and boost quality housing affordability in economically distressed communities through tax incentives that encourage long-term private investment. This unique program allows investors to defer and reduce taxes on capital gains by reinvesting those gains in designated OZs through an investment vehicle called a Qualified Opportunity Fund (QOF). It allowed the governor of each state or territory to designate 25% of the state's economically distressed communities (census tracts) as OZs (or a total of 25 census tracts if the state had fewer than 100 low-income communities).

- 1. Recommendation #1:** Communicate Clear, Data-Based OZ Selection Process
- 2. Recommendation #2:** Engage Broadly
- 3. Recommendation #3:** Prioritize Reform-Ready Places
- 4. Recommendation #4:** Pass Conformity, Amplify OZ Investment, Promote OZ Groups and Case Studies
 - Pass Fully State Conformity for OZ
 - Amplify OZ Investment by Layering in OZ to Place-Based Incentives
 - Promote OZs and Share Case Studies

[From Policy to Practice: Opportunity Zones 2.0 Reforms and a State Blueprint for Impact | Issue Brief |](#)

OPPORTUNITY ZONES: GUIDANCE FOR GOVERNORS AND MAYORS



Q Search About People Industries Practices Careers Insights

FBT Gibbons • Strategic Selection of Opportunity Zones 2.0: A Governor's Guide to Best Practices

Strategic Selection of Opportunity Zones 2.0: A Governor's Guide to Best Practices

Nov 19, 2025

Contributors

Frances Kern Mennone

Related Capabilities

- Government Services
- Lobbying & Public Policy
- Public Finance
- Public-Private Partnerships (P3)

STRATEGIES

HOME WHO WE ARE WHAT WE DO INSIGHTS UPDATES

VISUALIZATIONS

INSIGHTS

Laying the Groundwork for Opportunity Zones 2.0

12.29.2025

by Jess Myers





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OPPORTUNITY ZONES

PROJECT

Opportunity Zones

Project Home

Publications and Events

Opportunity Zones 2026 Selection Tool

Opportunity Zones 2026 Selection Tool

Following the creation of Opportunity Zones (OZ) in 2017, many designated areas received no investment, while others received a substantial amount. With the program reauthorized to continue with new OZ designations in 2026, state and territory governors and the mayor of Washington, DC, have an opportunity to use the OZ designation to more effectively direct private capital toward communities with a demonstrated need and ability to attract investment.

To inform policymakers' selections of OZs, we identified likely eligible census tracts and modeled which of these tracts are more or less likely to attract OZ investment. We further classified these tracts by degree of economic need, creating three categories: "Less

OPPORTUNITY ZONES: REFERENCE MATERIALS

OZ 2.0 Industry Updates

- **OZ 2.0 Designation Guides or Tools**

- Economic Innovation Group: “[Opportunity Zones 2.0: A Guide for Governors and Mayors](#)”
- America First Policy Institute: “[From Policy to Practice: Opportunity Zones 2.0 Reforms and a State Blueprint for Impact | Issue Brief |](#)”
- Urban Institute: “[Opportunity Zones 2.0 Selection Tool](#)”

- **OZ 2.0 Designation Articles**

- FBT Gibbons: “[Strategic Selection of Opportunity Zones 2.0: A Governor’s Guide to Best Practices](#)”, November 19, 2025
- TIP Strategies: “[Laying the Groundwork for Opportunity Zones 2.0](#)”, December 29, 2025
- Novogradac / EIG, “[OZ 2.0 Nominations Start in 2026: A Guide for What Governors and Mayors Should Do Now](#)”
- Urban Institute: “[Shaping the Opportunity Zone Map to Drive Housing Production That Best Meets Community Need](#)” February 4, 2026 (Urban Institute, Housing Matters)

OPPORTUNITY ZONES: HUD

HUD OZ Implementation Plan

HUD Office of Field Policy and Management (FPM)



Coordinate: This includes coordination with executive leadership, across departments, across federal agencies, and with external stakeholders. This also includes the creation of HUD's Opportunity Zones Implementation Plan.



Lead: This includes how HUD leadership and staff can help to “lead” local efforts to attract private investment working with state and local elected official and staff, private industry partners, and others in the community. HUD can play a role to inform, educate, and provide guidance related to the changes in the OZ tax incentive and to continue to promote the incentive.

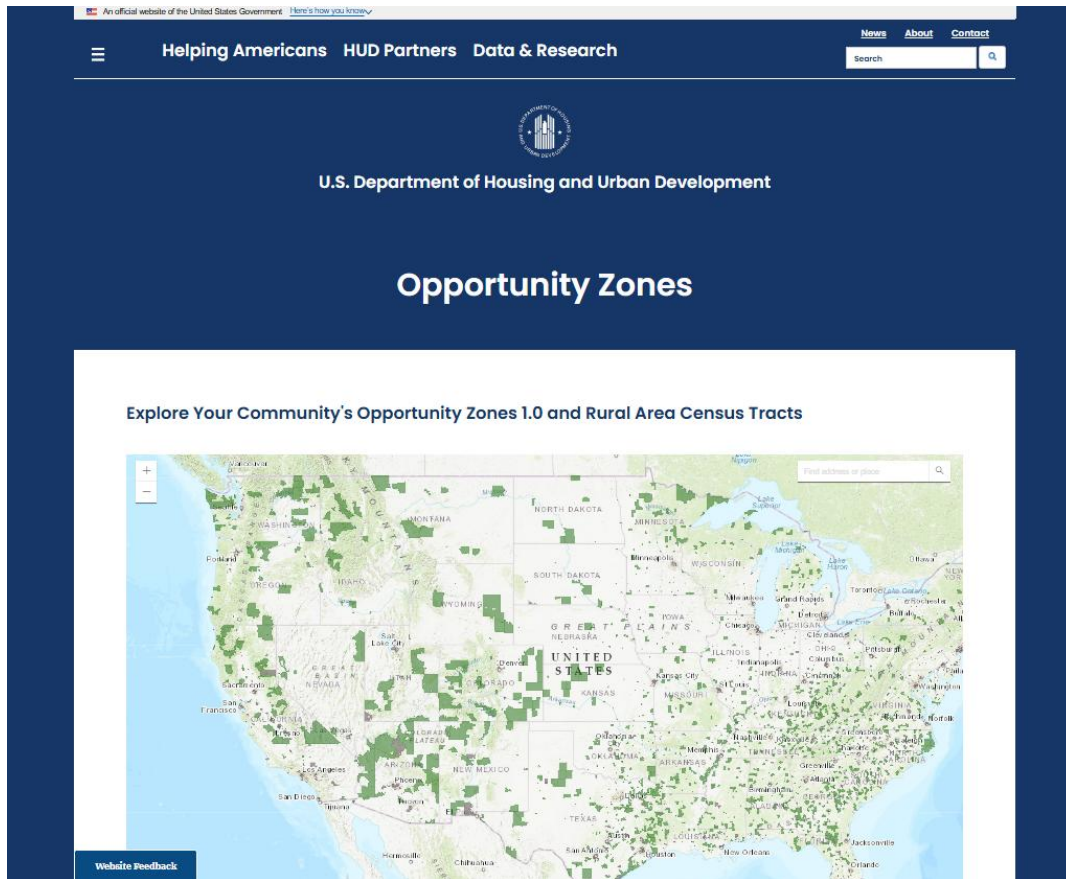


Collect Data: This includes how HUD can work with other federal agencies and the private sector to collect data to measure and analyze the effectiveness and outcomes of the OZ tax incentive.

OPPORTUNITY ZONES: RESOURCES

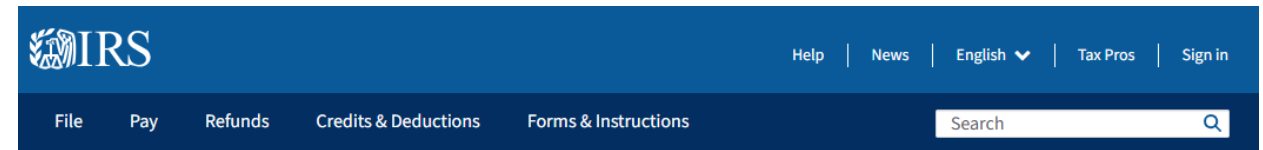
HUD OZ Website

<https://www.hud.gov/opportunity-zones>



IRS OZ Website

<https://www.irs.gov/credits-deductions/businesses/opportunity-zones>



[Home](#) / [Credits & Deductions](#) / [Business credits and deductions](#) / Opportunity zones

Opportunity zones

[English](#) | [Español](#)

Family, dependents and students

Clean energy and vehicle credits and deductions

Individuals credits and deductions

Business credits and deductions

[Employee Retention Credit](#)

[Forms for business credits](#)

Opportunity Zones are an economic development tool that allows people to invest in distressed areas in the United States.

Their purpose is to spur economic growth and job creation in low-income communities while providing tax benefits to investors.

Opportunity Zones were created under the Tax Cuts and Jobs Act of 2017 ([Public Law No. 115-97](#)). Thousands of low-income communities in all 50 states, the District of Columbia and five U.S. territories are designated as Qualified Opportunity Zones.

Taxpayers can invest in these zones through Qualified Opportunity Funds.

Invest in a Qualified Opportunity Fund

You can support economic development in Qualified Opportunity Zones and temporarily defer tax on eligible gains when you [invest in a Qualified Opportunity Fund](#).



OPPORTUNITY ZONES: RESOURCES

HUD OZ Website

<https://www.hud.gov/opportunity-zones>



U.S. Department of Housing and Urban Development

[Opportunity Zones](#) / [Opportunity Zones Updates](#)

Opportunity Zones Updates

Comparison Chart of OZ 1.0 versus OZ 2.0

	OZ 1.0	OZ 2.0
OPPORTUNITY ZONES LEGISLATION		
Enacted	December 22, 2017	July 4, 2025
Duration	Expires December 31, 2026; Temporary	Starts January 1, 2027; Permanent with 10 Year Cycles
OPPORTUNITY ZONES CENSUS TRACTS DESIGNATIONS		
OZ Census Tract Designation	One-Time Census Tract Designation	Designations every 10 Years (2027, 2037, 2047, etc.)
Date OZ Census Tracts Designated	July 9, 2018	First 10 Year Designation: Fall/Winter 2026
Date OZ Census Tracts End	December 31, 2028	First 10 Year Designation: December 31, 2036
# of Designated OZ Census Tracts	8,764	To be Determined in 2026 (Estimated ~6,500)
Governor Nomination Criteria	Governors could nominate up to 25% of eligible LIC tracts; up to 5% could be non-LIC contiguous tracts meeting ≤ 125% median income criteria	Governors could nominate up to 25% of eligible LIC tracts
"Low Income Community" Definition	IRC §45D(e): • Poverty rate ≥ 20%, or • Median family income ≤ 80% of metro/non-metro median	Tightened: Must meet either: (i) median family income ≤ 70% of area MFI, or (ii) poverty rate ≥ 20% and MFI ≤ 125% of area median.
What ACS Data Set Was / Will be Used?	Based on 2011-2015 American Community Survey (ACS) data / Per IRS Bulletin 2018-9	Uses most recent 5 year period for which data is available (could be 2020-2024 ACS data - not yet released) / IRS to Provide Guidance
Contiguous Census Tracts Eligibility	Up to 5% may be non-LIC contiguous tracts with AMI ≤ 125%	Contiguous tract nominations are explicitly prohibited
OPPORTUNITY ZONES TAX BENEFITS		
Original Gain Deferral	Gain Deferred Until 12/31/26 (Fixed Date)	5-Year Rolling Deferral
Original Basis Step-Up	10% (Holding Period: At 5 Years); Only if invested by 12/31/21 plus an additional 5% (15%) (Holding Period: At 7 Years);	10% (Holding Period: At 5 Years); 30% for QROF Investments in Rural Areas (Holding Period: At 5 Years)

OZ HUD Frequently Asked Questions

The following frequently asked questions and answers (FAQs) were prepared in response to inquiries about existing Opportunity Zones (OZ 1.0) and the new, permanent Opportunity Zones (OZ 2.0) tax incentive program. These HUD-prepared FAQs are intended to provide an understanding and awareness about Opportunity Zones, the role of U.S. Department of the Treasury and the U.S. Department of Housing and Urban Development (HUD), and the role of state and local government.

These FAQs do not constitute legal authority and may not be relied upon as such. They do not amend, modify, or add to the Income Tax Regulations or any other legal authority as published by the U.S. Department of the Treasury or the Internal Revenue Service (IRS).

Opportunity Zones Overview



Designated Opportunity Zones Census Tracts



Opportunity Zones Tax Benefits



Opportunity Zones 1.0 versus 2.0



Rural Areas and Qualified Rural Opportunity Funds (QROF)



Opportunity Zones and Reporting



Federal Agency Resources for Opportunity Zones



HUD Opportunity Zones Activities



White House Opportunity and Revitalization Council



State and Local Governments Opportunity Zones Activities



Opportunity Zones and Housing Supply



Definitions



OPPORTUNITY ZONES: HUD PROGRAM ALIGNMENTS

OZ are Built for Private-Public Partnerships

- OZ tax incentive is a place-based tax incentive for both private investment and place-based policy for local, state and federal resources to support the community capital stack for real estate and businesses needs
- Public funding may precede QOF equity, partner with QOF equity, or follow QOF equity

FHA Housing Funds Can Support OZ Housing Developments and Sub-Rehabilitations

- Federal Housing Administration (FHA) insured loans can support new multifamily housing development and sub-rehabilitations in designated Opportunity Zones
- Many housing developments include both FHA-insured loans and QOF equity in the capital stack
- Rental Assistance Demonstration (RAD) conversions that include FHA-insured loans or other debt also may include QOF equity in the capital stack

HUD PIH Funds Grants Can Incorporate OZ Planning and Attracting QOF Capital

- PIH Choice Neighborhoods Implementation grants have incorporated Opportunity Zones plans and needs into their neighborhood transformation plans

OPPORTUNITY ZONES: HUD PROGRAM ALIGNMENTS

HUD CPD DR Funds (CDBG-DR) Can Help to Recovery from Disasters in OZ

- CDBG-DR financing can take many forms including loans, grants, loan guarantees, equity-like investments, and working capital.
- Flexible underwriting takes into account the challenges of development in the recovery context, increasing the feasibility of OZ projects.
- CDBG-DR grantees can use funds strategically to support investment in OZ

HUD CPD Program Funds OZ Guides

- [Leveraging Section 108 with Opportunity Zone and Historic Tax Credit Financing Webinar](#)
- [Opportunity Zones and the HOME Program Webinar](#)
- [Using HOME within Opportunity Zones Guidebook](#)



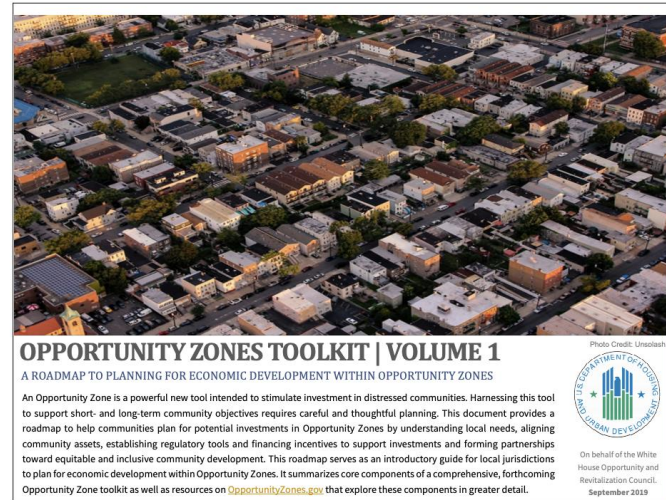
About this Guidebook

OPPORTUNITY ZONES: HUD RESOURCES

www.HUDExchange.gov

Resources

- [Opportunity Zones HUD.gov Website](#)
- [Opportunity Zones Toolkit Volume 1: Roadmap to Planning](#)
- [Opportunity Zones Toolkit Volume 2: Local Best Practices & Case Studies](#)
- [Leveraging Section 108 with Opportunity Zone and Historic Tax Credit Financing Webinar](#)
- [Opportunity Zones and the HOME Program Webinar](#)
- [Using HOME within Opportunity Zones Guidebook](#)



About this Guidebook

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Today's Agenda

- Introductions
- Presentation on Opportunity Zones (RA Stroebe)
- Discussion on OZ Designation process in Wisconsin

