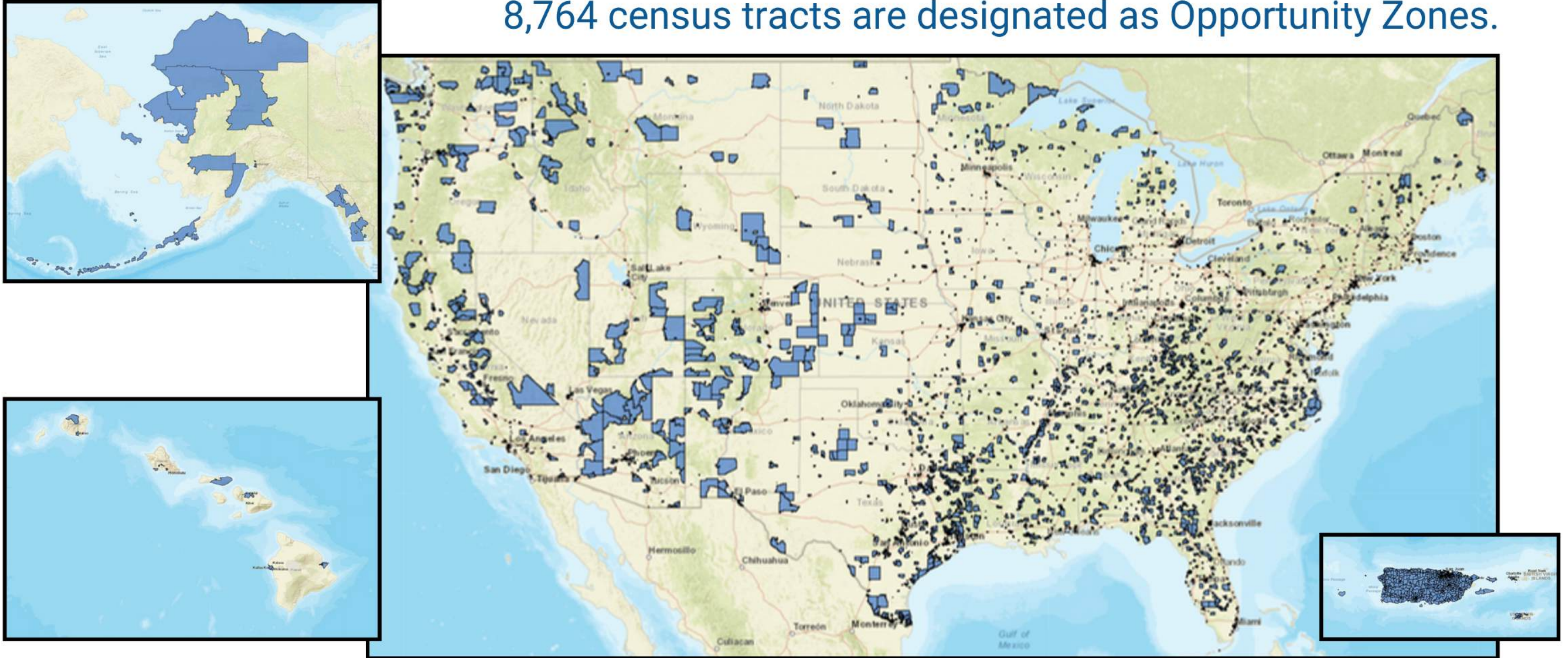


The Map Of Opportunity Zones (1.0) - In Effect Thru 12/31/2028 *

8,764 census tracts are designated as Opportunity Zones.



Source: <https://opportunityzones.com/map/>

* Note: 75% of the Opportunity Zones in Puerto Rico will expire on 12/31/2026.

Legislative Updates: Opportunity Zones 2.0

One Big Beautiful Bill Act Creates Opportunity Zones 2.0

- Passed by the Senate (51-50) on July 1, 2025.
- Passed by the House (218-214) on July 3, 2025.
- Signed into law by President Trump on July 4, 2025.

Key OZ 2.0 Provisions:

- Opportunity Zones now a permanent feature of the tax code.
- 5-year deferral and 10% basis step-ups for QOF investments after 12/31/26.
- Additional incentives for rural OZ investments.
- Decennial zone designation schedule with tighter eligibility requirements.
- Expanded reporting requirements.

Legislative Updates: Opportunity Zones 2.0

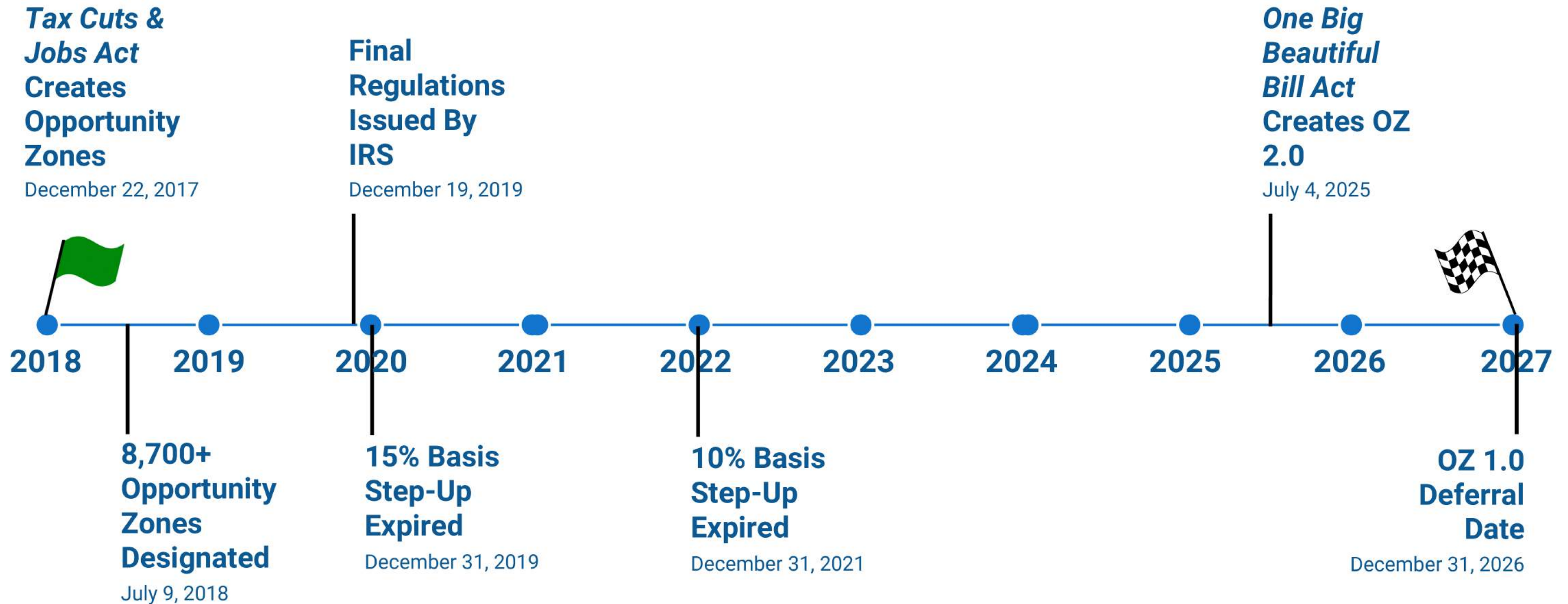
Popular OZ 2.0 Ideas Not Included In The OBBBA:

- ✗ Extension of the current OZ 1.0 deferral date (12/31/26).
- ✗ Tax treatment for non-gains dollars.
- ✗ Feeder funds (or, QOFs that can invest directly into other QOFs).
- ✗ Relief for interim gain reinvestment.
- ✗ Relief for pre-existing operating businesses to qualify more easily.
- ✗ Additional incentives for affordable housing.

New OZ Issues Created By The OBBBA:

- ⚠ The 2026 “Dead Zone”
- ⚠ 25% Reduction in the number of Opportunity Zones

Opportunity Zones Timeline



Opportunity Zones 2.0 Timeline

