



DATE: December 1, 2021

TO: State Historic Preservation Tax Credit Applicants

FROM: State Historic Preservation Office (SHPO) and Wisconsin Economic Development Corporation (WEDC)

SUBJECT: Revised guidance on the per parcel cap on Wisconsin Historic Tax Credits (Wis. Stat. 238.17)

Background

Effective July 1, 2018, WEDC may not certify persons to claim more than a total of \$3.5 million in state historic tax credits for projects undertaken on the same parcel. This document provides some helpful guidance on interpreting the per parcel cap. It is not meant to replace the advice of your legal counsel or accountant, but SHPO and WEDC's best understanding of the statute.

Definitions

The following definitions apply to this statute:

“Project” is defined as a Part 1/Part 2 Historic Preservation Certification Application as identified by SHPO pursuant to Wis. Stat. 71.07(9m)(c)2.a.; 71.28(6)(c)2.a.; 71.47(6)(c)2.a.

“Parcel” is defined as an individual real property parcel number as identified on the tax bill.

“Certification Date” is defined as the latter of either the date SHPO forwards the Part 2 application to the National Park Service (NPS), recommending conditional approval OR the date the Project is starting. For a Project pursuing only state historic tax credits, and not federal, the Certification Date will be the latter of the SHPO approval signature or the date the Project is starting.

Implementation of the Per Parcel Cap

All tax credit Projects with a Certification Date on or after July 1, 2018, are subject to the \$3.5 million dollar limit per parcel. A Project consisting of a single building or of multiple historic buildings on more than one parcel is eligible for up to \$3.5 million per parcel if they provide information reasonably necessary for WEDC to delineate the Project's qualified rehabilitation expenditures, building addresses, and applicants/owners across parcel numbers.