



May 24, 2018

Internal Revenue Service  
Attn: Scott Dinwiddie, Associate Chief Counsel (Income Tax and Accounting)  
Room 4500  
P.O. Box 7604  
Ben Franklin Station  
Washington, D.C. 20044

Dear Mr. Dinwiddie,

Recently, the Department of the Treasury's Internal Revenue Service (IRS) approved Opportunity Zone designations across the United States. It has become evident, however, that in the process leading to these decisions the critical importance of urban zero population census tracts was ignored.

TradePoint Atlantic (TPA), located at Sparrows Point, outside of Baltimore, Maryland was home to one of the largest integrated steel mills in the country that once employed 30,000 people. Like many of our country's industrial centers, the Sparrows Point steel mill fell into decline and ultimately shuttered, leaving behind a devastating impact to the surrounding communities that depended on its vitality. Today, Sparrows Point is re-emerging as a new center of commerce, a multi-modal global logistics hub positioned to be North America's premier industrial gateway, driving commerce between the United States and global markets through unmatched access to land, rail, and sea. The effort underway to revitalize this 3,250-acre industrial brown field requires significant private investment. Unfortunately, under current policy TPA is considered an urban zero population census tract (Baltimore County Census Tract 9800) and is therefore disqualified from benefiting from many federal programs.

Zero population census tracts are mistakenly perceived as bodies of water and public lands, but many are reviving industrial zones, and the areas that surround them are often distressed and suffer from economic depression and disinvestment. From the Pittsburgh Technology Center to Cleveland's Industrial Valley, reviving urban unpopulated sites across the country are developing into multimodal infrastructure hubs, affordable housing communities, and industrial centers. These projects, like TPA, which will generate 21,000 family-sustaining jobs to the Baltimore area upon completion, aim to bring back life to their communities. The exclusion of urban zero population census tracts from the Opportunity Zone designation demonstrates a clear unwillingness at a federal level to acknowledge the limitless value that these economic engines can provide, and the impact their revitalization will have on surrounding communities that were devastated as a result of the decline of America's once mighty industrial centers.



Opportunity Zones were established to connect private capital with low-income communities across America. Incentivizing revenue-generating projects in urban zero population census tracts to reinvest their unrealized capital gains in their communities will create vast economic opportunity on land currently underused and allow investors to develop and repurpose these zones, rather than the federal government. TPA, with its aging infrastructure and environmental legacy is a classic textbook example of how an Opportunity Zone should function.

Given this substantial policy disconnect, we respectfully request that the IRS develop guidance under IRC 1400Z-2 extending language from the *Tax Cuts and Jobs Act* mandating priority consideration of certain low-income areas for Opportunity Zone designations to revenue-generating urban zero population census tracts. We believe many will agree on the value of reviving our nation's former industrial sites into new centers of economic activity.

We also ask that the Department consider an additional round of nominations for Opportunity Zone designations follow the implementation of any new guidance so that these tracts may be fully considered, and the investment opportunities the present realized. We hope the Treasury and IRS will take this opportunity to blaze a path forward on these promising sites. Thank you for your careful consideration of this matter, and we look forward discussing the merits of this issue further.

Sincerest Regards,

A handwritten signature in blue ink, appearing to read 'Aaron Tomarchio', with a large, stylized initial 'A' and a circular flourish.

Aaron Tomarchio  
Senior Vice President  
Administration & Corporate Affairs  
TradePoint Atlantic