

119TH CONGRESS
2D SESSION

H. R. 9911

To amend the Internal Revenue Code of 1986 to allow maritime prosperity zones to be designated as qualified opportunity zones, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

JULY 23, 2026

Mr. KELLY of Pennsylvania (for himself and Mr. MORAN) introduced the following bill; which was referred to the Committee on Ways and Means

A BILL

To amend the Internal Revenue Code of 1986 to allow maritime prosperity zones to be designated as qualified opportunity zones, and for other purposes.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Shipbuilding Invest-
5 ment and Workforce Act”.

6 **SEC. 2. MARITIME PROSPERITY ZONES DESIGNATED AS**
7 **QUALIFIED OPPORTUNITY ZONES.**

8 (a) IN GENERAL.—Section 1400Z–1 of the Internal
9 Revenue Code of 1986 is amended by adding at the end
10 the following new subsection:

1 “(f) MARITIME PROSPERITY ZONES.—

2 “(1) IN GENERAL.—Notwithstanding any other
3 provision of this section, a population census tract
4 that is a maritime prosperity zone that is designated
5 as a qualified opportunity zone under paragraph (2)
6 shall be treated as a qualified opportunity zone for
7 purposes of this subchapter.

8 “(2) DESIGNATION.—For purposes of para-
9 graph (1), a population census tract that is a mari-
10 time prosperity zone is designated as a qualified op-
11 portunity zone if—

12 “(A) the Secretary of Commerce—

13 “(i) in consultation with the appro-
14 priate officials, nominates the tract for
15 designation as a qualified opportunity
16 zone, and

17 “(ii) notifies the Secretary in writing
18 of such nomination, and

19 “(B) the Secretary certifies such nomina-
20 tion and designates such tract as a qualified op-
21 portunity zone.

22 “(3) DEFINITIONS.—For purposes of this sub-
23 section—

24 “(A) MARITIME PROSPERITY ZONE.—The
25 term ‘maritime prosperity zone’ means a popu-

1 lation census tract that is determined by the
2 Secretary of Commerce, in consultation with the
3 appropriate officials, to be an appropriate site
4 for the operation of a maritime industry.

5 “(B) APPROPRIATE OFFICIALS.—The term
6 ‘appropriate officials’ means—

7 “(i) the Secretary of Defense,

8 “(ii) the Secretary of the Navy,

9 “(iii) the Secretary of Transportation,

10 “(iv) the United States Trade Rep-
11 resentative, and

12 “(v) the Director of the Office of
13 Management and Budget.

14 “(4) SPECIAL RULES.—

15 “(A) TREATMENT OF PROPERTY AND
16 TRADE OR BUSINESS WITH RESPECT TO MARI-
17 TIME PROSPERITY ZONES.—

18 “(i) IN GENERAL.—For purposes of
19 this subchapter, in the case of a population
20 census tract which is designated as a quali-
21 fied opportunity zone solely by reason of
22 paragraph (2)—

23 “(I) property shall not be treated
24 as qualified opportunity zone business
25 property (as defined in section

1 1400Z–2(d)(2)(D)) with respect to
2 such qualified opportunity zone unless
3 substantially all of the use of such
4 property, during substantially all of
5 the holding period for such property,
6 is in connection with a maritime in-
7 dustry, and

8 “(II) a trade or business shall
9 not be treated as a qualified oppor-
10 tunity zone business (as defined in
11 section 1400Z–2(d)(3)) with respect
12 to such qualified opportunity zone un-
13 less substantially all of the operation
14 of such trade or business is in connec-
15 tion with a maritime industry.

16 “(ii) MARITIME INDUSTRY.—For pur-
17 poses of this subsection—

18 “(I) IN GENERAL.—The term
19 ‘maritime industry’ means any indus-
20 try which is determined by the Sec-
21 retary to support, directly or indi-
22 rectly, the construction, reconstruc-
23 tion, repair, rehabilitation, or refur-
24 bishment of shipyards, ports, harbor
25 facilities, or vessels.

1 “(II) CERTAIN INDUSTRIES IN-
2 CLUDED.—Except as otherwise pro-
3 vided by the Secretary, any industry
4 assigned one of the following codes
5 under the 2022 North American In-
6 dustry Classification System shall be
7 treated as a maritime industry:

8 “(aa) 332 (Fabricated Metal
9 Product Manufacturing).

10 “(bb) 3366 (Ship and Boat
11 Building).

12 “(cc) 336611 (Ship Building
13 and Repairing).

14 “(dd) 333923 (Overhead
15 Traveling Crane, Hoist, and
16 Monorail System Manufac-
17 turing).

18 “(ee) 334511 (Search, De-
19 tection, Navigation, Guidance,
20 Aeronautical, and Nautical Sys-
21 tem and Instrument Manufac-
22 turing).

23 “(ff) 4883 (Support Activi-
24 ties for Water Transportation).

1 “(gg) 483111 (Deep Sea
2 Freight Transportation).

3 “(hh) 483113 (Coastal and
4 Great Lakes Freight Transpor-
5 tation).

6 “(ii) 483211 (Inland Water
7 Freight Transportation).

8 “(jj) 541330 (Engineering
9 Services).

10 “(B) LIMITATIONS.—

11 “(i) IN GENERAL.—The number of
12 population census tracts that are maritime
13 prosperity zones that may be designated as
14 qualified opportunity zones under para-
15 graph (2) at any time may not exceed 100.

16 “(ii) LIMITATION ON NUMBER OF
17 LOW-INCOME COMMUNITY DESIGNATIONS
18 UNCHANGED.—A population census tract
19 that is a maritime prosperity zone that is
20 designated as a qualified opportunity zone
21 under paragraph (2) shall not be taken
22 into account in determining the limitation
23 under subsection (d).”.

24 (b) BASIS INCREASE FOR INVESTMENTS IN QUALI-
25 FIED MARITIME PROSPERITY FUNDS.—Section 1400Z–

1 2(b)(2) of such Code (as amended by section 70421(c)(2)
 2 of Public Law 119–21) is amended—

3 (1) in subparagraph (B)(iii)(I), by inserting “or
 4 a qualified maritime prosperity fund” after “quali-
 5 fied rural opportunity fund”, and

6 (2) by adding at the end the following new sub-
 7 paragraph:

8 “(D) QUALIFIED MARITIME PROSPERITY
 9 FUND.—For purposes of subparagraph (B)(iii),
 10 the term ‘qualified maritime prosperity fund’
 11 has the same meaning given the term ‘qualified
 12 rural opportunity fund’, determined by sub-
 13 stituting ‘maritime prosperity zone (as defined
 14 in section 1400Z–1(f)(3)(A))’ for ‘qualified op-
 15 portunity zone comprised entirely of a rural
 16 area’ each place it appears.”.

17 (c) CONFORMING AMENDMENTS.—

18 (1) Section 1400Z–1(d)(1) of such Code is
 19 amended by striking “under this section” and insert-
 20 ing “under subsection (b)”.

21 (2) Section 1400Z–1(e)(2) of such Code is
 22 amended—

23 (A) by striking “under this section” and
 24 inserting “under subsection (b) or (f)(2)”, and

1 (B) by striking “subsection (b)(1)(B)” and
2 inserting “subsection (b)(1)(B) or (f)(2)(B) (as
3 the case may be)”.

4 (d) EFFECTIVE DATE.—The amendments made by
5 this section shall take effect beginning after December 31,
6 2026.

7 (e) DEADLINE TO BEGIN NOMINATION AND NOTIFI-
8 CATION PROCESS.—Not later than July 1, 2027, the Sec-
9 retary of Commerce shall begin the nomination and notifi-
10 cation process referred to in clauses (i) and (ii) of section
11 1400Z–1(f)(2)(A) of the Internal Revenue Code of 1986
12 (as added by subsection (a)).

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