

Charitable Conservation Contribution Tax Credit Tax Credit Program Evaluation Study December 2025

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Preface

lowa Code section 2.48 directs the Department of Revenue to review certain tax expenditures it administers. The schedule provided in this section requires a review in 2025 of the Charitable Conservation Contribution Tax Credit available under sections 422.11W and 422.33. "The review shall consist of evaluating [the tax credit] and assess its equity, simplicity, competitiveness, public purpose, adequacy, and extent of conformance with the original purpose of the legislation that enacted the tax expenditure, as those issues pertain to taxation in lowa." This is the Department of Revenue's third evaluation study completed for these expenditures. Prior studies of the Charitable Conservation Contribution Tax Credit were completed in 2015 and 2020.

As part of the evaluation, an advisory panel was convened to provide input and advice on the study's scope and analysis. We wish to thank the members of the panel:

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The assistance of an advisory panel implies no responsibility for the content and conclusions of the evaluation study. This report was also reviewed by Robin Anderson, Ph.D., State Chief Economist and Division Administrator of the Research and Policy Division. This study and other evaluations of Iowa tax credits can be found on the Tax Credits Tracking and Analysis Program web page on the Iowa Department of Revenue website.

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Executive Summary

The Iowa Charitable Conservation Contribution (CCC) Tax Credit was introduced in 2008. According to the 2008 Summary of Legislation released by the Iowa General Assembly, the purpose of the credit includes: preserving land for outdoor recreation by or for the education of the general public; protecting a relatively natural habitat of fish, wildlife, or plants; preserving open space for the public's scenic enjoyment or under a governmental conservation policy that will yield a significant public benefit; and preserving a historically important land area or a certified historic structure.

The credit is equal to 50.0 percent of the fair market value of qualifying donated property. Charitable conservation contributions are voluntary donations or restraints on the use of land agreed upon by a landowner and a private charitable conservation organization or government agency chosen by the landowner to hold the contribution. The voluntary restrictions on the use of the land apply to all forms of charitable contribution, whether they are a bargain sale, donation or easement. A bargain sale refers to a sale where the taxpayer sells property to charitable organization for less than its fair market value. Donations are defined as transferring ownership to the organization as a gift. An easement is a legal agreement where the taxpayer retains ownership of the land, but permanently restricts the future use of the land.

The CCC Tax Credit is automatic, in that any taxpayer with a qualifying charitable contribution can receive the credit. The credit is nonrefundable, however any credit in excess of the tax liability may be carried forward for up to twenty years. The maximum amount of the tax credit is \$100,000 per year, limiting eligible contributions to \$200,000. If the donation's fair market value is above \$200,000, the excess can be claimed as an itemized deduction.

Similar Tax Credit Programs Across the United States

- In addition to lowa, fourteen other states currently offer income tax credits for charitable conservation contributions. Additionally, the federal government an incentive for individuals, corporations, and partnerships who make qualified contributions of conservation land.
- Of the fourteen states that offer a program, only two states have specific requirements on the type of land that qualifies for the credit. Arkansas' credit specifically applies to wetlands and riparian zones. Mississippi requires that the land be considered a priority site by the state's natural heritage program or be adjacent to streams listed on the Mississippi Scenic Streams Stewardship Program.
- New York has the lowest tax credit rate offered at 25.0 percent of the property tax paid on the easement property, up to \$5,000. Colorado's program is the most generous rate at 90.0 percent of the easement's appraised value.

 Ten of the fifteen states, including lowa, do not allow the credits to be transferred, sold or traded. Thirteen of the fifteen states, including lowa, offer a credit that is nonrefundable.

Initial Charitable Conservation Contribution Tax Credits Earned

- For tax years 2008 through 2023 there were 498 initial tax credits claimed, 490 of which were by individual taxpayers. For confidentiality reasons, the remaining eight tax credits will not be detailed.
- 36.8 percent of taxpayers that claimed the CCC tax credit during the time period of tax year 2008 through tax year 2023 fell into an adjusted gross income (AGI) range of \$200,000 to \$999,999 based on total amount of credits earned. While the percentage of all taxpayers in this group for tax year 2023 is only 7.9 percent.
- Of the 490 credits earned in tax years 2008 through 2023 by individual taxpayers, 403 were from lowa residents, which equates to 82.2 percent.
- Nearly 79 percent of the credits were on returns with a married filing status based on number of credits earned.
- The average land value per acre contributed for the time period of tax year 2008 through tax year 2023 was \$2,472 and the average CCC Tax Credit expenditure per acre of \$436.

Charitable Conservation Contribution Tax Credit Contribution Types from Tax Year 2008 to Tax Year 2023

- Easements represented 43.9 percent of the number of contributions, 48.7 percent of the total credit dollars, and 53.5 percent of the total acres contributed.
- Bargain sales represented 29.5 percent of the number of contributions, 21.1 percent of the total credit dollars, and 28.6 percent of the total acres contributed.
- Donations represented 17.3 percent of the number of contributions, 20.5 percent of the total credit dollars, and 12.8 percent of the total acres contributed.
- Contributions where the type was undisclosed represented 9.4 percent of the number of contributions, 9.7 percent of the total credit dollars, and 5.2 percent of the total acres contributed.

Trend in Initial Charitable Conservation Contribution Tax Credits Earned

 The number of initial CCC Tax Credits peaked in tax year 2017 at 119. Since then the number of credits steadily declined to a low of seven in tax year 2021, and rebounded slightly with 12 credits in tax year 2022 and 10 credits in tax year 2023.

- An attempt to obtain data from other states on the number of conservation contribution tax credits that were claimed by their taxpayers was made. However, only one of the states contacted, New Mexico, responded to the request for data. Their data does show some fluctuation by tax year; however, it does not display a distinctive trend in the number of claims, acres conserved, or expenditure.
- National information regarding the federal incentive for conservation contributions was gathered from the Internal Revenue Service's (IRS) Statistics of Income report. The IRS data does show that the number of returns and donations peaked in tax year 2018, and has dropped off in recent tax years. However, it does not appear that the decrease is as drastic as what has been experienced in Iowa.

Tax Credit Utilization

- The Iowa Natural Heritage Foundation (INHF) appears to be one of the primary organizations in Iowa receiving qualified charitable gifts of land for conservation purposes. Due to this fact, their data was used to provide insight into the utilization of the CCC Tax Credit.
- For the time period of tax year 2008 through tax year 2023, the INHF reported 348 projects on their gift reports. Of these 348 projects, it was determined that 120 tax credits were claimed, which equates to a utilization rate of just under 35.0 percent.

Contribution Information by Iowa County

- Based on the data available, 59 of lowa's 99 counties had a land contribution where the donor utilized the CCC Tax Credit between tax year 2008 and tax year 2023.
- The largest number of acres donated was in Marion County at 2,300 acres. The smallest number of acres donated was in Grundy County at 17 acres.

I. Introduction

lowa currently offers the Charitable Conservation Contribution (CCC) Tax Credit to provide an incentive for taxpayers who make an unconditional charitable donation of qualified real property interest located in lowa to a qualified organization exclusively for conservation purposes. Commonly, the objective of the donors is to formalize their long-term vision for the land and prevent the land from being developed into residential, commercial, or industrial space. This credit became effective in tax year 2008, as a result of the lowa General Assembly enacting House File (HF) 2700.

The layout of the remainder of this evaluation study is as follows. Section II of this report provides a detailed description of the Charitable Conservation Contribution

Tax Credit. Section III provides information about tax credits and incentives in other states and at the federal level. Section IV presents a review of relevant research regarding various topics of charitable contributions for conservation purposes. Section V provides descriptive statistics related to credits earned, donors, and the land contributed. In Section VI an economic analysis will be offered regarding the tax credit. This analysis will include information on trends in tax credits earned, tax credit utilization, and contribution information by county. The final section of this study provides a brief conclusion.

II. Description of the Charitable Conservation Contribution Tax Credit

The lowa Charitable Conservation Contribution (CCC) Tax Credit was introduced in 2008. The credit is equal to 50.0 percent of the fair market value of qualifying donated property. Charitable conservation contributions are voluntary restrictions on the use of land negotiated by a landowner and a private charitable conservation organization or government agency chosen by the landowner to hold the contribution. The voluntary restrictions on the use of the land applies to all forms of charitable contribution, whether they are bargain sales, donations or easements.

Regarding the simplicity of claiming the CCC Tax Credit, the credit is automatic, in that any taxpayer with a qualifying charitable contribution can claim the credit. To conform with the filing requirements, a taxpayer must complete form IA 148, which is the lowa tax credits schedule. Additionally, the taxpayer must provide a copy of federal Form 8283, which is used to report noncash charitable contributions. The credit is nonrefundable, however any credit in excess of the tax liability may be carried forward for up to twenty years. The maximum amount of the tax credit is \$100,000 per year, limiting eligible contributions to \$200,000. If the donation's fair market value is above \$200,000, the excess can be claimed as an itemized deduction.

III. Similar Tax Credit Programs Across the United States

A. Federal Incentives for Conservation Contributions

In 1964, the IRS first authorized a federal charitable income tax deduction for the donation of a conservation easement to the US for land adjacent to federal highways. By 1980, Congress made conservation easement deductions for donations to government agencies and charitable organizations a permanent part of the Internal Revenue Code. In 2006, Congress made changes to the Pension Protection Act, including amendments to qualified conservation contributions, that increased the deduction limit from 30 percent of the donor's AGI with a 5-year carryforward to 50 percent of AGI with a 15-year carryforward for individuals. An individual who is a qualified farmer or rancher may deduct up to 100 percent of the

individual's contribution base against federal tax liability based on federal AGI. However, if the property donated by the farmer is used for agriculture or livestock production, the contribution must have a restriction that the land continues to be available for that production. These increases were repeatedly extended for short periods of time through 2014. However, in December 2015, the higher deduction limit and longer carryforward period was made permanent.

Additionally, a new rule was enacted by the SECURE 2.0 Act of 2022 relating to qualified conservation contributions made by a partnership or S corporation after December 29, 2022. A deduction is not allowed if the contribution exceeds 2.5 times the sum of each partner's or shareholder's relevant basis. There are three exceptions to this rule. In general, the first relates to family partnerships or S corporations, the second is for contributions made outside of a three-year holding period, and the third concerns preservation of a certified historic structure.

The federal conservation tax deduction is also available to C corporations who contribute a charitable land conservation easement to a qualified charitable organization. For corporations, the maximum amount allowable for any tax year is ten percent of the corporation's taxable income for that year.

Finally, the One Big Beautiful Bill Act (OBBBA) was signed into law on July 4, 2025 and does contain some provisions related to charitable contributions. OBBBA introduced a new 0.5 percent AGI floor for itemized charitable deductions, beginning in tax year 2026 for individual taxpayers. This results in taxpayers only being able to deduct charitable contributions that exceed 0.5 percent of their AGI. For corporations, a 1.0 percent taxable income floor was put into place, which operates in a similar way to the individual taxpayer floor. In general, these floors could encourage taxpayers to make fewer, but larger, charitable donations. There are other stipulations in OBBBA regarding charitable contributions, however they involve cash contributions, so they should not impact contributions of land.

B. State Incentives for Conservation Contributions

In addition to lowa, fourteen other states currently have income tax credits in place for charitable conservation contributions to charitable organizations or government entities (see Table 1). This table was compiled in an attempt to gauge the competitiveness and adequacy of lowa's credit versus other states.

While many of the state programs do not specify the type of land that qualifies for a credit, two states in the table have specific requirements. Arkansas' tax credit is unique in that it specifically applies to wetlands and riparian zones. In general, a riparian zone is land that is along edges of rivers, streams, lakes, and other water bodies. These zones are important because they provide habitat, help maintain

water quality and can provide flood control. The program offered by Mississippi also has some restrictions as the land must be considered a priority site by the Mississippi Natural Heritage Program or be adjacent to streams listed on the Mississippi Scenic Streams Stewardship Program.

Six of the states listed in Table 1 offer a tax credit of 50.0 percent of the appraised fair market value of the contributed property. Colorado and California have the most generous tax credit rates, with Colorado offering 90.0 percent of the easement's appraised value and California providing a credit of 55.0 percent of the fair market value of the donated property. Maryland's credit is equal to the lesser of the individual's state tax liability for the year or the maximum credit of \$5,000 per owner who qualifies for the credit. Georgia, North Carolina, and South Carolina have a tax credit rate of 25.0 percent of the fair market value of the property, which include restrictions on the maximum amounts that can be claimed. New York also has a 25.0 percent credit rate, but it is based on the property tax paid on the subject property.

The transferability of the credits also varies by state, with the majority of states not allowing the credit to be transferred. Ten of the fifteen states, including lowa, do not allow the credits to be transferred, sold or traded. The remaining five states: Colorado, Georgia, New Mexico, South Carolina, and Virginia allow the credits to be transferred. Similarly, a majority of the 15 states offer a credit that is nonrefundable. The only two states that allow the credit to be refunded are Colorado and Massachusetts.

IV. Literature Review

While literature specific to the state of lowa is limited, there is research at the national level that addresses various topics concerning charitable conservation contribution tax credits. The research discussed in the following sections will communicate different findings and views regarding these credits.

A. Motivation for Taxpayers to Make Contributions

Many of the studies reviewed addressed the motivation for taxpayers to make charitable contributions of land. One such study identified general motivational categories as community, culture, environmental, family heritage or legacy, financial incentives, open-space protection, place attachment, societal factors, and witnessing land development (Farmer, Knapp, Meretsky, Chancellor, & Fischer, 2011). Some of the motivations were discussed more frequently than others in the journal articles reviewed.

One of the more commonly analyzed motivations was financial incentives of tax credits for land donations and easements. One study expresses that donating an easement implies a commitment to a permanent reduction in the landowner's income and a temporary tax benefit that accrues only until the deductions and tax credits are exhausted (Parker & Thurman, 2018). A second study published in 2015 explains that the economic benefits to the landowner from placing land under a conservation easement derives from a reduction in property value which reduces the landowner's tax burden and/or the sale of development rights on that property (Kamal, Grodzinska-Jurczak, & Brown, 2015). Additionally, a general theme that was consistent across many of the studies is the land owners have a strong emotional attachment to their land, thus the potential financial gain that could come from a sale to a developer is of little importance to them. Halperin (2011) confirms this idea by stating that many donors have no intention of selling and would view area-wide restrictions as increasing the property's value.

As mentioned previously, there are many other motivating factors that drive a taxpayer's decision to make a charitable contribution of land. Kamal et al. (2015) state there is growing interest among landowners (especially in developed countries) to conserve their land based on growing awareness of the benefits of nature conservation. This idea will be discussed in greater detail in a subsequent section. Additional literature expressed that the motivation of landowners may be personal goals such as maintaining the land for farming, reducing friction among heirs, assuring a home site for children, or contributing open space and protecting habitat (Merenlender, Huntsinger, Guthey, & Fairfax, 2004). An additional reflection on taxpayer motivation is the idea that a voluntary contribution is much more appealing to them than a regulatory policy that undermines their private property rights. Not surprisingly, a number of studies have identified that landholders generally consider voluntary measures much more palatable as a policy approach to conservation (Cooke, Langford, Gordan, & Bekessy, 2012).

B. Valuing Contributions

As mentioned previously, one of the claim filing requirements for the lowa credit is that taxpayers are required to include with the lowa return a copy of federal Form 8283. This form, among other items, has a field that allows the taxpayer to state the fair market value of the property being donated. In many cases, the fair market value is determined by engaging an appraiser to assign a value to the property. Some of the studies reviewed addressed the difficulty of valuing donations and easements. A study published in the Harvard Journal on Legislation states cash contributions are fairly straightforward. Cash is easy to measure and easy to spend, and it is easy to fathom the benefit that flows to the donor. Property, by contrast, is hard to measure (and so administer), can be hard to spend, and makes for a difficult assessment of the benefit to the donee. In addition, as a matter of tax policy, it is

easy to defend a deduction for cash contributions, even if there is no consensus as to any one rationale. Property contributions, however, are much harder to defend under any of the prevailing rationales (Colinvaux, 2013). A separate study stated gifts of property can raise concerns when it comes to value. The value of property may be misstated. It can be difficult to determine the value of a donated item, and there is a strong incentive for the donor to overstate the value of their donation in order to claim a larger deduction and thus decrease their taxable income (Halperin, 2011). Halperin (2011) goes into more detail in regards to easements, stating they are often hard to appraise and easy to overvalue, mainly due to the lack of comparable sales on like property. Flynn (2021) explains the process an appraiser typically follows when completing a qualified appraisal on an easement. The appraiser first looks at the fair market value of the property – the value it would fetch in an arms' length transaction - without the easement. Next, the appraiser determines the value of the land with the easement on it. The appraiser would consider factors such as sales for similar properties under easement, other properties both developed and undeveloped, and the terms of the easement. The value of the easement is often determined using the "before and after" method, comparing the two appraisals and the drop-in property value the easement creates. In summary, many studies address, including the ones mentioned above, express the unique challenges that accompany a contribution of charitable land.

C. Conservation Benefits

As mentioned elsewhere in this study, one of the primary goals of the CCC Tax Credit is to provide an incentive for land owned by private parties to be permanently placed in an arrangement where it is conserved and protected. One commentary states that it is increasingly becoming clear that society and ecosystems are linked and that the well-being of people is tied to the health of the land by maintaining ecosystem services (e.g., clean water, healthy soils, etc.) upon which people depend, while at the same time enhancing human livelihoods and well-being (Horton, Knight, Galvin, Goldstein, & Herrington, 2017).

Although it is unlikely that private land can meet all conservation needs, it can substantially contribute to increasing protected habitat and species (Kamal, Grodzinska-Jurczak, & Brown, 2015). The literature reviewed also suggests that private entities may be the most adept organizations in respect to these arrangements. Gattuso (2008) states private land trusts, working closely with property owners to preserve land through easements, have been known to be more effective stewards than government, and numerous studies bear this out. Another study on this topic declares voluntary conservation activity on private land is needed to achieve conservation on the scale needed for species or natural systems to thrive. Easements represent an opportunity to engage in substantial environmental protection on private land (Flynn, 2021).

Furthermore, the literature suggests that for incentive-based programs to be effective, it is imperative to have well-defined conservation goals that are both ecologically sound and acceptable to land owners (Kamal, Grodzinska-Jurczak, & Brown, 2015). However, monitoring and enforcing conservation goals can be a challenge. Merenlender et al. (2004) declare that if an easement requirement cannot be readily monitored, it likely cannot be enforced. Some organizations have adopted monitoring practices that do not allow for regular verification that the terms of the easement are being met by the landowner. For example, an annual walk-through or fly-over may not detect violations of easement restrictions on hunting or pesticide use but is adequate to detect new structures. With that being said, some flexibility in easements is needed not only to adapt to new scientific findings and changing ecosystems but to assure that future landowners can adapt to changing circumstances and that these changes can be negotiated equitably between the landowner and the easement holder (Merenlender, Huntsinger, Guthey, & Fairfax, 2004).

D. Impact on the Public

One important issue that is discussed in the literature is the perceived impact, both positive and negative, of charitable conservation contributions and related tax credits on the public. However, the perceived impact can be complicated to analyze and quantify. As one piece of research states, the challenges in evaluating preservation policies is that both the social benefits as well as the potential cost to the owners are not directly observable (Ahlfeldt, Holman, & Wendland, 2012).

In general, land conservation potentially provides numerous benefits to the general public. These benefits can include improved environment health, expanded recreational opportunities, and slowing of land development. Additionally, conservation contributions may also provide for a potential increase in property values. One study states the preservation of open space may increase nearby property values, which in turn could lead to tax revenue for municipalities and townships (Reeves, Mei, Bettinger, & Siry, 2018).

However, some feel that incentives for charitable contributions of land come at some public cost (e.g. tax revenue) and often use public funds. Public input into their activities varies in scope, intensity, and structure. What the public has acquired in exchange for the public money used and consequences for tax revenue is unknown (Merenlender, Huntsinger, Guthey, & Fairfax, 2004). Regarding tax revenue, it is important to note that in Iowa a charitable contribution of land does not change its tax class or taxable value. An additional report suggested that the size of the credit could affect the impact on the public, as a relatively generous easement tax credit has the potential to attract donated easements that are not in society's best interest

(Vercammen, 2019). Another potentially problematic aspect of conservation easements is the requirement that the easement be held in perpetuity in order for the grantor to receive tax benefits. Such restrictions have ecological and economic implications to the public interest – the intended beneficiary of conservation easements – that extend far into the future (Gattuso, 2008).

V. Descriptive Statistics for Charitable Conservation Contribution Tax Credit

A. Initial Credits Earned

Table 2 below outlines the number of initial CCC Tax Credit claims by tax year from 2008 to 2023. In tax year 2008, the initial year of the credit, the number of initial tax credits was 16. The number of credits peaked in tax year 2017, with 119 credits being earned. A possible explanation for this high number of tax credits in 2017 could be that taxpayers were anticipating the impacts of the Tax Cut and Jobs Act (TCJA). TCJA was signed into law on December 22, 2017 and most of the provisions took effect on January 1, 2018. The Act lowered individual income tax rates, thus reducing the value of all tax deductions. It also increased the standard deduction, while eliminating other itemized deductions. One itemized deduction that was impacted as a result of TCJA, was the state and local tax (SALT) deduction. The TCJA capped the SALT deduction at \$10,000 for tax years beginning in 2018. In general, the changes made by the TCJA discouraged charitable giving relative to prior tax law.

In recent years the number of credits claimed has declined significantly, with only 10 credits being claimed in tax year 2023. Table 2 also presents the average initial tax credit amount earned. The average amount has ranged from a low of \$16,376 in tax year 2017 to a high of \$65,674 in tax year 2011. The average amount has not displayed a distinct trend or pattern over the years, rather it has fluctuated over the years.

As mentioned previously in this study, the CCC Tax Credit can be carried forward for up to twenty years and is nonrefundable. Table 3 displays the dollar amount of initial credits earned versus the dollar amount of the initial credit that is carried forward into future tax years. Due to the fact that each charitable contribution commonly results in a large earned CCC Tax Credit, many of the credits are not fully claimed in the tax year they are earned. The table shows that over the tax years presented 78.1 percent of the initial credits were carried forward into future tax years. The 2019 tax year had the highest percentage of credits carried forward at 90.2 percent. Conversely, the most recent tax year shown, 2023, had the lowest percentage of initial credits carried forward at 62.8 percent.

The Charitable Conservation Contribution Tax Credit is available to both individual and corporate taxpayers. Table 4 provides a breakdown of tax credits earned by tax type. The number of credits claimed is almost exclusively individual taxpayers for tax years 2008 through 2023. Of the 498 initial tax credits claimed, 490 of them were by individual taxpayers. For confidentiality reasons, the remaining eight tax credits will not be detailed.

A further examination of the characteristics of the tax credit claimants was completed. Due to limited numbers of corporate, estate, and trust claimants, the information in the remainder of this section is limited to individual taxpayers to protect confidentiality. Table 5 and Figure 1 below categorize the 490 initial tax credits earned between tax years 2008 and 2023 into five ranges of household AGI. Additionally, all tax year 2023 individual income taxpayers were divided into these same AGI groups to study the equity of this credit. The data shows that the majority of taxpayers that claimed the CCC tax credit during the time period fell into the AGI range of \$200,000 to \$999,999 based on total amount of credits earned. The percentage for this group was 36.8 percent, while the percentage of all taxpayers in this group is only 7.9 percent. The largest distribution of individual income taxpayers for the \$30,000 to \$99,999 AGI group at 45.3 percent. The percentage of CCC tax credit claimants in this same AGI group is 15.3 percent based on amount of tax credits earned. Taxpayers with an AGI of over \$1,000,000 make up 0.8 percent of all taxpayers, but accounted for 14.6 percent of the total amount of credits earned.

An additional item to consider when evaluating the equity of the credit is which counties are utilizing the credit most. As discussed elsewhere in this study, 40 of the 99 lowa counties did not have a contribution during the time period presented. When looking at which counties had a contribution, there does not appear to be anything that would suggest that one part of the state overwhelmingly benefited more than another, although there are clusters of counties where more contributions occurred. Moreover, it does not look as if the distribution of counties with a credit is drastically skewed in favor of counties that would be viewed as either urban or rural. However, it is important to mention the contributions analyzed were limited to those where complete information could be gathered either from the federal Form 8283 or from data provided from the receiving organization. Of the 490 individual credits earned in tax years 2008 through 2023, only 139 had ample information to be included in this analysis, which equates to 28.4 percent. Due to this fact, the number and location of contributions presented may not be a true representation of the complete picture.

The data presented in the preceding paragraph warrants further discussion about the simplicity of current claim filing requirements. Please recall that one of the claim filing conditions for the credit is that taxpayers are required to include with the lowa return a copy of federal Form 8283. A limitation of this study is that it was discovered

that in many cases the federal Form 8283 was filled out incorrectly, incompletely or had a vague description (i.e. "farm land", rather than "100 acres of farm land located in Polk County") of the land being contributed. Perhaps the requirements need to be examined to make the process and necessary forms more clear-cut for the taxpayers, which in turn may result in more complete and accurate information on the contributions.

Additionally, an analysis was conducted in respect to the number of initial credits claimed by lowa residents versus non-residents (see Table 6). As would be expected, the Table shows that the majority of credits are earned by taxpayers who reside in lowa. Of the 490 credits earned in tax years 2008 through 2023, 403 were from lowa residents. This equates to 82.2 percent. Based on the total dollar amount of credits earned, 87.3 percent of credits were earned by lowa residents. Finally, the average amount of tax credits earned was \$32,754 for lowa residents and \$22,128 for out of state taxpayers.

Another aspect that was explored was the filing status of the taxpayers claiming this credit (see Table 7). The Table shows that nearly 79 percent of the credits were on returns with a married filing status based on number of credits earned. Single status taxpayers accounted for 19.4 percent of the credits, with head of household representing the remaining 1.8 percent of credits. However, when looking at the dollar amount of the credits, single filing status made up 24.2 percent of the credits, with married statuses at 74.0 percent. The head of household status made up 1.8 percent of the total dollar amount of tax credits earned during this time period.

Finally, an attempt was made to estimate the CCC tax credit expenditure per acre (see Table 8). Please note that this Table only contains data for credits earned where complete information on the contribution could be gathered either from the federal Form 8283 or from data provided from the receiving organization. Another limitation to note is that the value of land involved in a bargain sale is most likely undervalued because available data only includes that tax credit amount which is the difference between the fair market value and the bargain sale price. Ideally, full fair market value data would be available for these sales. Nonetheless, based on the information presented in the Table, the average land value per acre contributed for the time period was \$2,472. The total CCC Tax Credit deduction was \$7,218,158 and the total number of acres reported was 16,559, resulting in a CCC Tax Credit expenditure per acre of \$436. This expenditure per acre equates to 17.6 percent of the appraised fair market value of the land contributed. This 17.6 percent is considerably less than the 50.0 percent of the fair market value that is allowed to be claimed under the CCC Tax Credit. The most likely reason for this is that a number of the charitable contributions exceed the \$200,000 tax credit threshold.

B. Charitable Conservation Contribution Tax Credit Contribution Types

As mentioned earlier in this study, charitable conservation contributions can be in the form of a bargain sale, donation, or easement. Table 9 organizes CCC Tax Credit contributions into these three categories, along with those donations that were classified as undisclosed. As was the case with the information presented in Table 8, the table only contains data for credits claimed where complete information on the contribution could be gathered either from the federal Form 8283 or from data provided from the receiving organization. The Table shows that based on number of contributions, total credit dollars, and number of acres contributed, easements are the most popular form of contribution. As a reminder, easements are a legal agreement where the taxpayer retains ownership of the land, but permanently restricts its future use. The next most used form of contribution is a bargain sale. which represented 29.5 percent of the total number of contributions, 21.1 percent of the total credit dollars, and 28.6 percent of the acres contributed. Bargain sales occur when the taxpayer sells property to a charitable organization for less than its fair market value. Donations, which transfer ownership to the organization as a gift, were the least used type of contribution regardless of the distribution method used.

VI. Economic Analysis

A. Trend in Initial Charitable Conservation Contribution Tax Credits Earned

An examination of the number of initial Charitable Conservation Contribution Tax Credit claims earned by tax year was presented earlier in this study for lowa taxpayers. This discussion showed that the number of initial credits peaked in tax year 2017 at 119. Since then the number of credits steadily declined to a low of seven in tax year 2021, and rebounded slightly with 12 credits in tax year 2022 and 10 credits in tax year 2023. Based on this information, it is sensible to explore if other states that offer a similar tax credit are experiencing the same decline in the number of initial claims. Ideally, it would be best to compare lowa's data to other states in the Midwest. However, no states contiguous to Iowa offer a similar credit (see Table 1). Of the states that offer a similar credit, it was determined that three states are somewhat similar to lowa based on population and their urban versus rural makeup. These three states were contacted in an attempt to obtain data on the number of credits that were claimed by their taxpayers. However, only one of the states contacted, New Mexico, responded to the request for data (see Table 10). While the data from New Mexico does show some fluctuation by tax year, it does not display a distinctive trend by the number of claims, acres conserved, or expenditure (see Figure 2).

National information regarding the federal incentive for conservation contributions was also gathered (see Table 11 and Figure 2). The information is from the Internal

Revenue Service's (IRS) Statistics of Income Report. More specifically data was gathered regarding noncash charitable contributions that were listed under the classification of conservation easement claims. Table 11 shows both the number of returns with conservation easement claims, as well as the total number of donations. The number of donations is higher than the number of returns, as a taxpayer could have more than one donation listed in a single tax year. Along with the number of returns and donations, the IRS provides data regarding the average amount per return and the average amount per donation. The IRS data does show that the number of returns and donations peaked in tax year 2018, and has dropped off in recent tax years. However, when considering the average amount per return and average amount per donation, these amounts have shown a steady increase in recent tax years.

The peak in federal conservation easement claims that occurred in 2018 does warrant some additional discussion. Based on information that was discovered during the literature review, as well as information provided directly from the IRS, it may be the case that the 2018 peak was due to some abuse of this tax benefit. The IRS states that during this time period there were promoters of syndicated conservation easements (SCEs) that were advocating for taxpayers to enter into partnerships or other pass-through entities that would allow them to claim charitable contribution deductions in amounts that significantly exceeded the amount invested. This abuse was so problematic that the Charitable Conservation Easement Program Integrity Act was introduced in 2018 in an attempt to end these types of transactions. While the Act did not pass in 2018, it had continued support and was eventually passed as part of the SECURE 2.0 Act of 2022.

In conclusion, it would appear that the recent decline in initial credits earned in lowa is not necessarily part of a larger trend being experienced by similar states. However, it is important to acknowledge the limited data that is readily available to make a comparison. Additionally, the federal data presented is most likely skewed based on the questionable practices regarding easements that were discussed previously. A more comprehensive study on the topic may yield different results, however that level of analysis is outside of the scope of this study.

B. Tax Credit Utilization

An important question that needs to be studied is how widely is the Charitable Conservation Contribution Tax Credit utilized by those entities making charitable donations of land. This question is difficult to analyze due to the fact that not only would data be needed on the number of tax credits earned, but data would also be needed on the number of charitable donations of land in general. Since the Department of Revenue does not have data and details concerning the number of charitable donations of land in lowa, it was necessary to use a proxy. In order to

address this question annual gift data provided by the Iowa Natural Heritage Foundation was analyzed (see Table 12). Based on work done while completing this evaluation study, along with data from past studies, it became apparent that the INHF is one of the primary organizations in Iowa receiving charitable gifts of land for qualified conservation purposes. Thus, it was determined that their data would provide excellent insight into the utilization of the CCC Tax Credit.

For the time period of tax year 2008 through tax year 2023, the INHF reported 348 projects on their gift report. Of these 348 projects, it was determined that 120 tax credits were claimed, which equates to a utilization rate of just under 35 percent. When looking at the utilization rates for the individual tax years, they have fluctuated up and down every year, with no particular pattern or trend.

There are a number of reasons that could explain why the CCC Tax Credit appears to be underutilized. One such reason could be that the taxpayer or organization receiving the contribution could simply be unaware that the credit is available. Another reason for not utilizing the credit could be that the design of the credit is not appealing to the taxpayer. As noted earlier in this study, the CCC Tax Credit is neither refundable or transferable, which may limit its attractiveness. A further reason may be that the taxpayer lacks lowa income, thus has little or no tax liability. As each taxpayers' motivations are unique, there are perhaps other reasons for the credit not being utilized than those listed above. However, it is interesting to note that a representative from the INHF stated that there have been a number of cases where the availability of the CCC Tax Credit played a critical role in a landowner's decision of whether or not to go through with the charitable contribution. It is their belief that in some cases without the CCC Tax Credit in place, the INHF would have not received the charitable donation from the landowner. To test this statement made by the INHF, a "but-for" analysis could be utilized. In general, this type of analysis determines if an action was the cause of an outcome. Given the information and data available, it was determined that a "but-for" analysis was outside of the scope of this evaluation study. However, the conversation with the INHF gives some insight on what would have happened if the credit was not in place.

C. Contribution Information by Iowa County

Another consideration to explore in this study is whether all counties in Iowa are benefiting from the Charitable Conservation Contribution Tax Credit. While there are many approaches that could be used to define benefit, this study will look at the number of acres of land that has been contributed within a county as the primary measurement. Figure 3 shows a map of Iowa counties, along with the number of acres donated between tax year 2008 and tax year 2023. As is the case with other data presented in this study, the data contained on this map only contains data for credits earned where complete information on the contribution could be gathered

either from the federal Form 8283 or from data provided from the receiving organization.

The map shows that the largest number of acres donated during this time frame was 2,300 acres in Marion County. The smallest number of acres contributed, other than counties with no contributions, was 17 acres in Grundy County. The map also indicates that of the 99 lowa counties, 40 counties did not have a contribution during this time period. Geographically, the counties with the most acres contributed are located in the central, north central, northeast and western portions of the state. The most likely reason for the high number of acres being donated in these areas is they are situated within or near land with unique geological formations or land that provides critical wildlife habitat. Examples of this would be the Loess Hills area in western lowa and the Driftless Area in northeast lowa.

A related question that must be considered is would the contributions made in these unique geological areas, or even in more 'common' areas, have happened regardless of having the CCC Tax Credit in place. To get an answer to that question, at a minimum the individual donors would need to be contacted and interviewed to understand the motivation for their contribution and if they would have moved forward under the hypothetical condition of the credit not existing. That process is outside of the scope of this study. However, it may be possible to glean some insight into this question through a review of the scholarly literature available on the subject of charitable giving in general. The traditional explanation for such giving is that people are motivated by pure altruism (Kamdar, Levitt, List, Mullaney, & Syverson, 2015). Additionally, it is believed that people give because it feels good to give, or because of the 'warm glow' they receive from giving to a worthy cause (Kamdar, Levitt, List, Mullaney, & Syverson, 2015). This idea would suggest that at least some of the contributions would have been made if the CCC Tax Credit didn't exist.

Furthermore, an interesting concept on the influences on charitable giving is presented in a study from 2022 that discusses 'Charitable Triad Theory'. The key insight of Charitable Triad Theory is that charitable giving is a triadic phenomenon. In other words, three actors are involved: the donor, the beneficiary, and the fundraiser. Collectively, we refer to these actors as the Charitable Triad (Chapman, Louis, Masser, & Thomas, 2022). The key tenets of Charitable Triad Theory are as follows. First, giving is triadic because the characteristics of three actors—donors, beneficiaries, and fundraisers—influence charitable decisions. Second, the characteristics of each of the three actors may be necessary but not sufficient to promote charitable giving. Third, giving is relational because interactive relationships between the triad determine charitable choices. In other words, donors may give (or fail to give) because of: (1) their own characteristics; (2) characteristics of the beneficiary in question and/or of the person or organization asking for donations; or (3) the interactive relationships among these three actors (Chapman,

Louis, Masser, & Thomas, 2022). This theory reinforces the idea that the decision to make a large charitable contribution is a complex one, and the result of different forces impacting the ultimate decision. Thus, it would be difficult to say with any degree of certainty whether or not a specific contribution would have happened if the CCC Tax Credit didn't exist.

Finally, regarding the 40 counties on the map presented in Figure 3 without a contribution listed, there could be a few explanations as to why that is the case. First, these counties could have had a contribution or contributions where the CCC Tax Credit was claimed, but they were unable to be identified due to the data limitations of this study mentioned previously. Additionally, there could have been contributions made, but the CCC Tax Credit was not claimed on the taxpayers return. For similar reasons as mentioned above, it is outside of the scope of this study to attempt to contact the individual donors to inquire about why they did not pursue the CCC Tax Credit.

VII. Conclusion

This evaluation study provides detailed information about the lowa Charitable Conservation Contribution Tax Credit. The motivation of the tax credit is to encourage landowners throughout lowa to contribute land to a qualified organization exclusively for conservation purposes. Continued participation in this program should lead to additional lands being protected that are significant geologically, provide essential wildlife habitat, or simply offer lowans and visitors to the State a place to enjoy various forms of outdoor recreation.

As discussed throughout this study, participation in this credit has varied over the years, with recent tax years experiencing a decline in the number of tax credits earned. Existing data from a similar state, along with federal data, was gathered in an attempt to see if this trend was unique to lowa or part of a larger movement. The available data did not provide a conclusive answer to this question regarding the drop in credits earned.

Additionally, this study reviewed data in an effort to determine how many taxpayers utilized the tax credit after making charitable contributions of conservation land. As was the case for a number of items related to this study, the completeness of data available was lacking, but with a fair amount of certainty it can be said that the utilization rate is significantly less than 50 percent.

Finally, consideration was given to which counties had charitable land contributions where the credit was earned within their borders for the time period since the inception of the credit through tax year 2023. This examination was an attempt to determine if the contributions and credits were evenly distributed across the state

or were there concentrated clusters. The information that was available and complete showed that approximately 40 percent of the counties in lowa had no contributions where the credit was claimed. As would be expected many of the credits were claimed for land donations made in counties that were near unique geological formations or land that provides critical wildlife habitat.

As of the date of this study, there is no sunset date when the tax credit is set to expire. This will allow for more time to pass, which will make more data available on the effectiveness and interest in this tax credit. Additionally, with the very recent passage of the OBBBA there may be an impact in upcoming tax years with regards to the size and frequency of charitable contributions of land by lowa taxpayers.

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Tax Credit Program Evaluation Study

Tables and Figures

Table 1. States with Tax Credits for Charitable Contributions for Conservation Purposes

Government	Tax Credit Name	Eligible Contributions	Tax Type	Tax Credit Rate	Statewide Tax Credit Cap	Transfer	Refundable	Carry Forward	Date Applicable
Arkansas	Wetland and Riparian Zones Tax Credit	Donation of conservation easements in wetland and riparian zones	Income Tax	50 percent of the easement's appraised value, up to \$50,000	No Cap	No	No	Unused credits may be carried forward 10 years.	January 1, 1996
California	Natural Heritage Preservation Tax Credit	Donation of land, an easement, or water rights	Income Tax	55 percent of the fair market value of the donated property	No Cap	No	No	Unused credits may be carried forward 8 years.	January 1, 2010
Colorado	Gross Conservation Easement Credit	Donation made to a governmental entity or a charitable organization that was created at least two years prior to receipt of the easement	Income Tax	90 percent of the easement's appraised value	Statewide \$50 million per year	Yes	Yes	Unused credits may be carried forward 20 years	January 1, 2000
Connecticut	Connecticut Donation of Land Tax Credit	Donations of conservation land or easements	Income Tax	50 percent of the fair market value of the donated property	No Cap	No	No	Unused credits may be carried forward 25 years	January 1, 2013
Delaware	Delaware Conservation Easement Tax Credit	Donations of conservation land or easements	Income Tax	40 percent of the easement's appraised value, up to \$50,000	Statewide \$1 million per year	No	No	Unused credits may be carried forward 5 years	January 1, 2001
Georgia	Georgia Conservation Tax Credit	Donation of fee-title lands or permanent conservation easements to a government entity or qualified organization	Income Tax	25 percent of the fair market appraised value, up to \$250,000 for individual donors and \$500,000 for corporate and partnership donors.	Statewide \$4 million per year	Yes	No	Unused credits may be carried forward 10 years	January 1, 2008
lowa	Charitable Conservation Contribution Tax Credit	Donations of conservation land or easements	Income Tax	50 percent of the fair market appraised value, up to \$100,000 per taxpayer.	No Cap	No	No	Unused credits may be carried forward 20 years	January 1, 2008
Maryland	Preservation and Conservation Easement Credit	Donations of conservation easements	Income Tax	The credit is equal to the difference in the fair market values of the property reduced by payments received for the easement. The credit amount is limited to the lesser of the individual's state tax liability for that year or the maximum allowable credit of \$5,000, per owner, who qualifies to claim the credit.	No Cap	No	No	Unused credits may be carried forward 15 years for a maximum credit of \$80,000	January 1, 2001

Table 1 continued. States with Tax Credits for Charitable Contributions for Conservation Purposes

Government	Tax Credit Name	Eligible Investments	Tax Type	Tax Credit Rate	Statewide Tax Credit Cap	Transfer	Refundable	Carry Forward	Dates Applicable
Massachusetts	Conservation Land Tax Credit	Donations, bargain sales or conservation restrictions of land	Income Tax	50 percent of the fair market appraised value, up to \$75,000	Statewide \$2 million per year	No	Yes	None	January 1, 2011
Mississippi	Land Conservation / Preservation Credit	Donations of land or interest in land considered a priority site by the Mississippi Natural Heritage Program or lands along or adjacent to streams listed on the Mississippi Scenic Streams Stewardship Program	Income Tax	50 percent of the allowable transaction costs, not to exceed \$10,000	No Cap	No	No	Unused credits may be carried forward 10 years	January 1, 2003
New Mexico	Conveyance of Land for Conservation or Preservation Credit	Preservation of relatively natural habitat, open space, agricultural lands, outdoor recreation or education for the benefit of the general public, and/or historically important structures or land areas	Income Tax	50 percent of the fair market appraised value, up to \$250,000	No Cap	Yes	No	Unused credits may be carried forward 20 years	January 1, 2004
New York	The New York Conservation Easement Tax Credit	Donations of conservation land or easements	Income Tax	25 percent of the property tax paid on the easement property, up to \$5,000.	No Cap	No	No	None	January 1, 2007
North Carolina	North Carolina Farm Act	Donations of conservation land	Income Tax	25 percent of the fair market value of the property, up to \$250,000 for individuals and \$500,000 for corporations	Statewide \$5 million per year	No	No	None	January 1, 2025
South Carolina	South Carolina Conservation Easement Tax Credit	Donations of conservation land or easements	Income Tax	25 percent of the fair market appraised value, up to \$52,500 and \$250 per acre	No Cap	Yes	No	Unused credits may be carried forward indefinitely until the full credit is claimed	January 1, 2001
Virginia	Land Preservation Tax Credit	Donations of conservation land or easements	Income Tax	40 percent of the easement's fair market value, up to \$20,000 per year	No Cap	Yes	No	Unused credits may be carried forward 10 years	January 1, 2000

Source: Obtained from the relevant public agencies in the respective states

Table 2. Initial Earned Charitable Conservation Contribution Tax Credits by Tax Year, Tax Years 2008-2023

Tax Year	Number of Initial Tax Credits Earned	Amount of Initial Tax Credits Earned	Average Initial Tax Credit Amount Earned
2008	16	\$713,714	\$44,607
2009	34	\$894,276	\$26,302
2010	52	\$1,501,255	\$28,870
2011	21	\$1,379,152	\$65,674
2012	22	\$1,031,542	\$46,888
2013	26	\$949,871	\$36,534
2014	23	\$745,159	\$32,398
2015	15	\$783,500	\$52,233
2016	53	\$1,416,608	\$26,728
2017	119	\$1,948,761	\$16,376
2018	45	\$1,239,213	\$27,538
2019	24	\$501,578	\$20,899
2020	19	\$763,864	\$40,203
2021	7	\$378,317	\$54,045
2022	12	\$678,264	\$56,522
2023	10	\$385,554	\$38,555
Total	498	\$15,310,628	
Average	31	\$956,914	\$38,398

Source: Iowa Department of Revenue - IA 148 Tax Credits Schedule

Table 3. Initial Earned Charitable Conservation Contribution Tax Credits Carried Forward by Tax Year, Tax Years 2008-2023

Tax Year	Number of Initial Tax Credits Earned	Amount of Initial Tax Credits Earned	Amount of Initial Tax Credits Carried Forward	Percentage of Initial Tax Credit Carried Forward
2008	16	\$713,714	\$516,246	72.3%
2009	34	\$894,276	\$678,568	75.9%
2010	52	\$1,501,255	\$1,219,401	81.2%
2011	21	\$1,379,152	\$1,036,369	75.1%
2012	22	\$1,031,542	\$734,244	71.2%
2013	26	\$949,871	\$833,893	87.8%
2014	23	\$745,159	\$628,805	84.4%
2015	15	\$783,500	\$676,725	86.4%
2016	53	\$1,416,608	\$1,146,254	80.9%
2017	119	\$1,948,761	\$1,516,516	77.8%
2018	45	\$1,239,213	\$1,030,309	83.1%
2019	24	\$501,578	\$452,517	90.2%
2020	19	\$763,864	\$485,236	63.5%
2021	7	\$378,317	\$238,003	62.9%
2022	12	\$678,264	\$514,686	75.9%
2023	10	\$385,554	\$242,260	62.8%
Total	498	\$15,310,628	\$11,950,032	78.1%

Source: Iowa Department of Revenue - IA 148 Tax Credits Schedule

Table 4. Initial Earned Charitable Conservation Contribution Tax Credits by Tax Type, Tax Years 2008-2023

Tax Year	Number of Initial Tax Credits - Individual	Number of Initial Tax Credits - Total
2008	16	16
2009	33	34
2010	52	52
2011	21	21
2012	22	22
2013	26	26
2014	23	23
2015	15	15
2016	53	53
2017	113	119
2018	44	45
2019	24	24
2020	19	19
2021	7	7
2022	12	12
2023	10	10
Total	490	498

Source: Iowa Department of Revenue - IA 148 Tax Credits Schedule Note: Tax credits not earned by individuals were not detailed for confidentiality reasons

Table 5. Initial Earned Charitable Conservation Contribution Tax Credit Claimants by Household Adjusted Gross Income, Tax Years 2008-2023 with Comparison to All Tax Year 2023 Household Taxpayers

AGI Range	Number of Tax Credits Earned	Distribution of the Number of Tax Credits Earned	Total Amount of Tax Credits Earned	Distribution of Amount of Tax Credits Earned	Average Amount of Tax Credit Earned	Number of All TY2023 Taxpayers	Distribution of All TY2023 Taxpayers
\$29,999 or Less	22	4.5%	\$691,032	4.6%	\$31,411	408,312	25.5%
\$30,000 - \$99,999	108	22.0%	\$2,313,160	15.3%	\$21,418	724,028	45.3%
\$100,000 - \$199,999	155	31.6%	\$4,338,931	28.7%	\$27,993	327,124	20.5%
\$200,000 - \$999,999	166	33.9%	\$5,573,578	36.8%	\$33,576	126,656	7.9%
\$1,000,000 or More	39	8.0%	\$2,208,507	14.6%	\$56,628	13,432	0.8%
Total	490	100%	\$15,125,208	100%	\$30,868	1,599,552	100%

Figure 1. Distribution of Household Adjusted Gross Income for Households with CCC Credit Claimed for Tax Years 2008-2023 Compared to All Tax Year 2023 Household Filing Taxes

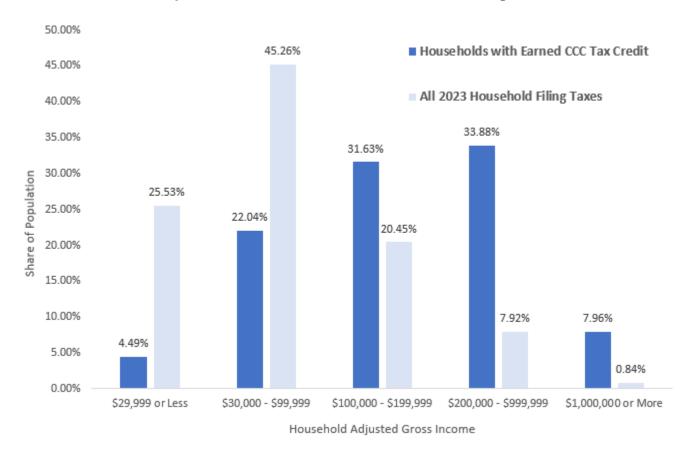


Table 6. Initial Earned Charitable Conservation Contribution Tax Credit Claimants by Residency Status, Tax Years 2008-2023

Residency Status	Number of Tax Credits Earned	Distribution of the Number of Tax Credits Earned	Total Amount of Tax Credits Earned	Distribution of Amount of Tax Credits Earned	Average Amount of Tax Credit Earned
Out of State	87	17.8%	\$1,925,151	12.7%	\$22,128
In State	403	82.2%	\$13,200,057	87.3%	\$32,754
Total	490	100%	\$15,125,208	100%	\$30,868

Table 7. Initial Earned Charitable Conservation Contribution Tax Credit Claimants by Filing Status, Tax Years 2008-2023

Filing Status	Number of Tax Credits Earned	Distribution of the Number of Tax Credits Earned	Total Amount of Tax Credits Earned	Distribution of Amount of Tax Credits Earned	Average Amount of Tax Credit Earned
Single	95	19.4%	\$3,657,927	24.2%	\$38,504
Married Filing Joint	192	39.2%	\$6,894,775	45.6%	\$35,910
Married Filing Seperately	194	39.6%	\$4,304,493	28.5%	\$22,188
Head of Household	9	1.8%	\$268,013	1.8%	\$29,779
Total	490	100%	\$15,125,208	100%	\$30,868

Table 8. Estimated Cost to the State of Iowa per Acre Contributed for Charitable Conservation Contribution Tax Credit, Tax Years 2008-2023

Tax Year	Acres Reported	Land Value	CCC Tax Credit Deduction	Land Value per Acre	CCC Tax Credit Expenditure per Acre
2008	796	\$1,071,428	\$391,214	\$1,346	\$491
2009	1,334	\$2,993,529	\$403,983	\$2,244	\$303
2010	1,735	\$4,885,853	\$934,173	\$2,816	\$538
2011	3,407	\$4,291,000	\$917,250	\$1,259	\$269
2012	1,005	\$1,320,614	\$363,333	\$1,314	\$362
2013	781	\$1,761,030	\$370,777	\$2,254	\$475
2014	339	\$255,900	\$127,950	\$755	\$377
2015	680	\$1,622,000	\$500,700	\$2,385	\$736
2016	2,088	\$3,855,490	\$530,648	\$1,846	\$254
2017	931	\$6,241,542	\$360,461	\$6,704	\$387
2018	383	\$1,291,000	\$353,090	\$3,371	\$922
2019	435	\$2,026,000	\$300,000	\$4,657	\$690
2020	647	\$3,497,193	\$576,056	\$5,405	\$890
2021	465	\$1,702,484	\$377,417	\$3,661	\$812
2022	1,358	\$3,479,650	\$538,076	\$2,562	\$396
2023	175	\$633,764	\$173,030	\$3,622	\$989
Total	16,559	\$40,928,477	\$7,218,158	\$2,472	\$436

Sources: Federal Form 8283 Data; INHF & TNC Gift Data

Table 9. Charitable Conservation Contribution Tax Credit Contributions by Type of Contribution, Tax Year 2008 – Tax Year 2023

Type of Contribution	Distribution of Number of Contributions	Distribution of Total Credit Dollars	Number of Acres Contributed	Distribution of Acres Contributed	Total Value of Contributions	Value of Contribution per Acre
Bargain Sale	29.5%	21.1%	4,732	28.6%	\$9,991,012	\$2,111
Donation	17.3%	20.5%	2,117	12.8%	\$8,588,468	\$4,057
Easement	43.9%	48.7%	8,856	53.5%	\$19,438,724	\$2,195
Undisclosed	9.4%	9.7%	855	5.2%	\$2,910,273	\$3,402

Sources: Federal Form 8283 Data; INHF & TNC Gift Data

Table 10. Initial Claims Earned New Mexico Conveyance of Land for Conservation or Preservation Credit, Tax Years 2016-2023

Tax Year	Claims	Acres Conserved	Expenditure
2016	35		\$937,000
2017	31	963	\$906,000
2018	50	14,627	\$1,138,000
2019	51	77,655	\$2,606,000
2020	26	5,735	\$306,000
2021	56	22,109	\$1,694,000
2022	49	3,990	\$2,028,000
2023	23	318,691	\$184,000
Total	321	452,241	\$9,799,000

Source: New Mexico Taxation and Revenue Department

Figure 2. Comparison of Credits and Claims Earned: Iowa Charitable Conservation Contribution Tax Credit, New Mexico Conveyance of Land for Conservation or Preservation Credit, and Federal Form 8283 Conservation Easement, Tax Years 2016-2023

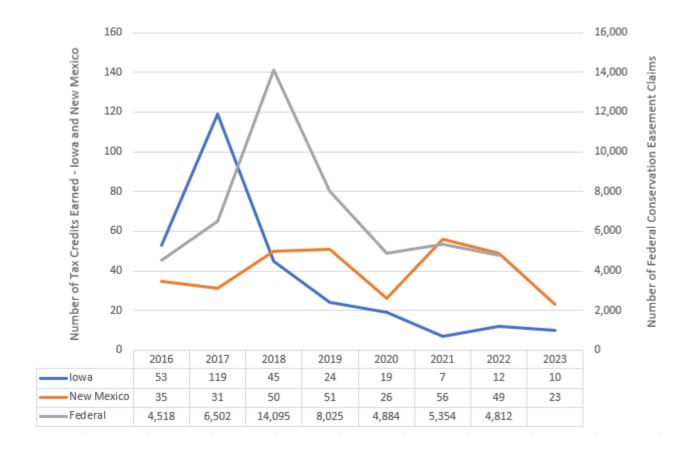


Table 11. Federal Form 8283 Conservation Easement Claims, Tax Years 2015-2022

Tax Year	Number of Returns	Number of Donations	Average Amount per Return	Average Amount per Donation
2015	3,766	4,767	599,974	474,010
2016	3,540	4,518	1,195,539	936,954
2017	4,823	6,502	746,364	553,627
2018	9,844	14,095	660,666	461,411
2019	6,005	8,025	1,405,165	1,051,532
2020	4,151	4,884	1,226,653	1,042,485
2021	4,320	5,354	1,616,787	1,304,462
2022	4,553	4,812	2,377,217	2,249,068

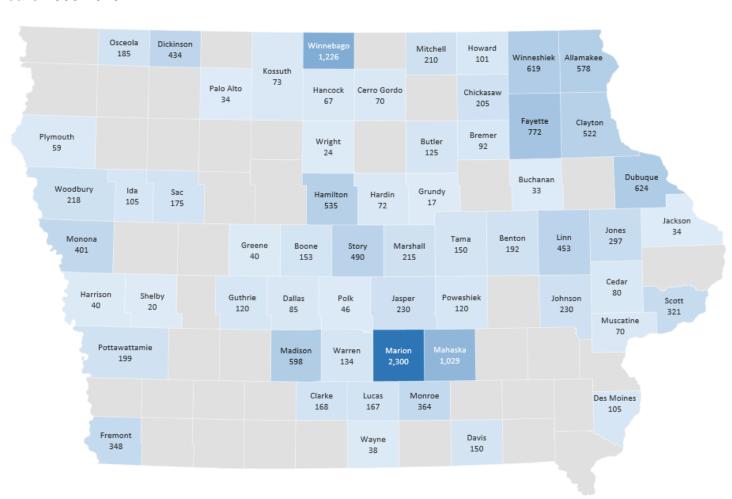
Source: Internal Revenue Service - Statistics of Income, Noncash Charitable Contributions

Table 12. Iowa Natural Heritage Foundation Contribution History of Charitable Conservation Contribution Tax Credit Utilization, Tax Years 2008-2023

-	INHF		
	Contribution	Contribution Projects	
	Projects	Claiming	CCC Tax Credit
Tax Year	Reported	CCC Tax Credits	Utilization Rate
2008	19	7	36.8%
2009	37	12	32.4%
2010	34	12	35.3%
2011	23	13	56.5%
2012	19	8	42.1%
2013	16	4	25.0%
2014	18	3	16.7%
2015	10	6	60.0%
2016	36	13	36.1%
2017	40	11	27.5%
2018	18	6	33.3%
2019	13	2	15.4%
2020	22	9	40.9%
2021	15	4	26.7%
2022	20	7	35.0%
2023	8	3	37.5%
Total	348	120	34.5%

Sources: Federal Form 8283 Data; INHF Gift Data

Figure 3. Charitable Conservation Contribution Tax Credit Total Acres Contributed by County Location, Tax Years 2008-2023



Sources: Federal Form 8283 Data; INHF & TNC Gift Data