



North Carolina Department of Natural and Cultural Resources

State Historic Preservation Office

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary D. Reid Wilson

Office of Archives and History
Deputy Secretary Darin J. Waters, Ph.D.

May 1, 2023

Mr. Raffaele Allen
1910 Hunt LLC
207 Granby Street, Suite 203
Norfolk, VA 23510

Re: North Carolina Historic Mill Rehabilitation Tax Credit Eligibility Certification
Flint Mill No. 2 - Burlington Industries, Inc. Plant
1910 Hunt Avenue, Gastonia, Gaston County, NC
HPO Project #F21068
NPS Project #44478

Dear Mr. Allen:

Thank you for your request for the eligibility certification pursuant to Chapter 105 of the North Carolina General Statutes "Article 3H. Mill Rehabilitation Tax Credit" for Flint Mill No. 2 - Burlington Industries, Inc. Plant, a certified historic structure listed individually in the National Register of Historic Places.

An eligible site is a site located in this State that satisfies all of the following conditions:

- a. It was used as a manufacturing facility or for purposes ancillary to manufacturing, as a warehouse for selling agricultural products, or as a public or private utility.
- b. It is a certified historic structure or a State-certified historic structure.
- c. It has been at least eighty percent (80%) vacant for a period of at least two years immediately preceding the date the eligibility certification is made.

Our office has reviewed the information you provided and is pleased to issue this letter of eligibility certification for Flint Mill No. 2 - Burlington Industries, Inc. Plant pursuant to Chapter 105 of the North Carolina General Statutes "Article 3H. Mill Rehabilitation Tax Credit."

The eligibility certification is the first of two certifications. The final certification, the cost certification, can be issued only after the rehabilitation is complete and designated a certified rehabilitation. The cost certification is the certification obtained by the State Historic Preservation Officer from the taxpayer of the amount of the qualified rehabilitation expenditures or the rehabilitation expenses incurred with respect to a certified rehabilitation of an eligible site. In order to be eligible for a credit allowed by Article 3H, the taxpayer must provide a copy of this eligibility certification and the cost certification.

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For income-producing projects, a taxpayer who is allowed a credit under section 47 of the Code for making qualified rehabilitation expenditures of at least three million dollars (\$3,000,000) with respect to a certified rehabilitation of an eligible site located in a development tier one, two or three area is allowed a credit equal to a percentage of the expenditures that qualify for the federal credit.

For nonincome-producing projects, a taxpayer who is not allowed a federal credit under section 47 of the Code and who makes rehabilitation expenses of at least three million dollars (\$3,000,000) with respect to a certified rehabilitation of an eligible site located in a development tier one or two area is allowed a credit equal to a percentage of the rehabilitation expenses.

The eligibility certification is to be used in conjunction with appropriate North Carolina Department of Revenue regulations. Questions concerning specific tax consequences or interpretations of North Carolina income tax rules and bulletins should be addressed to the Department of Revenue. The full text of Chapter 105 of the North Carolina General Statutes "Article 3H, Mill Rehabilitation Tax Credit" can be found on the following link:

http://www.ncleg.net/EnactedLegislation/Statutes/PDF/ByArticle/Chapter_105/Article_3H.pdf

If you have questions concerning the above comments, please contact Tim E. Simmons, Senior Preservation Architect/Tax Credit Coordinator, at 919-814-6585 or tim.simmons@ncdcr.gov.

Sincerely,



Ramona M. Bartos, Deputy
State Historic Preservation Officer

Cc: Frank Gadsams
Heather Fearnbach
Tim E. Simmons
Mitch Wilds
Brett Sturm