

**REQUEST FOR QUALIFICATION
CONDITIONS ASSESSMENT AND FEASIBILITY STUDY
JOHN DEAN GALLUP HOUSE, HEWITT FARM
BID OPENING DATE:
OCTOBER 2, 2020 - 1:00PM**



the John Dean Gallup house
Connecticut State Historic Register
built in 1732

PROJECT ABSTRACT

The Town of North Stonington, Hewitt Farm Committee is seeking bids from a 36 CFR Part 61- Qualified Historical Architect or other qualified firm skilled in historic building preservation and rehabilitation, to prepare a Conditions Assessment and Feasibility Study for the potential reuse of the John Dean Gallup House located on the Hewitt Farm property in North Stonington, Connecticut.

The Conditions Assessment will help the Hewitt Farm Committee continue their renovation efforts more efficiently by focusing their limited resources on projects specifically recommended in the report. The John Dean Gallup House is currently unoccupied increasing its risk of theft, vandalism, deterioration, or un-noticed structural or water damage. The Feasibility Study will help identify an appropriate use of the property - one that preserves the historical character of the residence and is sensitive to the Hewitt Farm property as a whole- allowing Town to better target solicitation efforts to lease the property.

The Town has been awarded a State Historic Preservation Office (SHPO) grant to complete the Conditions Assessment and Feasibility Study. A copy of the grant application is attached and contains additional information about the project, a list of the renovations and repairs that have been completed to date, and photographs of the house.

PROPERTY BACKGROUND INFORMATION

In 2008, the Mystic Seaport sold the 104-acre Hewitt Farm property located on Rte. 2, to the Town of North Stonington. Thanks to volunteers and town support, considerable work has been done on this beautiful property over the past 11 years.

The John Dean Gallup House, located on the property, is a significant eighteenth century house listed on the Connecticut State Register of Historic Places, and an important part of our Town's history. It is a fine example of an early center chimney cape style house, thought to have been built in 1732. It is a low, broad, one and one half-story post and beam frame building with a moderately steep pitched, gabled roof. It has

a large central chimney holding three stone hearths and a bake oven. The house has been modified slightly over the years including additions, but the north-facing keeping room and the two south-facing best rooms have been kept mostly as they were in the early days.

When the property was purchased from Mystic Seaport in 2008, the house was being rented to a family connected to the Seaport. In the summer of 2018, the Town made the decision not to renew the lease. As of December 2018, the house has been vacant easing Town progress on necessary repairs and improvements. There is also a farm building in good condition adjacent to the house that will likely become a future project.

GENERAL REQUIREMENTS

The scope of work for the Conditions Assessment and Feasibility Study of the John Dean Gallup house consists of the following:

- An assessment of the existing condition of the structure and costs related to its stabilization and rehabilitation.
- An analysis of the reuse potential of the subject property with several scenarios for reuse and a recommendation of the most viable reuse option.
- Preparation of a draft report that includes: a) An introduction that outlines the purpose of the study, site description, chronology and historical overview of the subject property; b) An analysis of the current physical condition of the property, as well as associated costs of renovations and/or repair; c) A description of reuse scenarios and associated issues; and d) A financial analysis that details expected rehabilitation costs for reuse alternatives. Draft report must be submitted 30 days after project award.
- Presentation of the draft report to the Town and community stakeholders for review and comment. Written responses to review comments shall be incorporated into the final report.
- Preparation of a final report that includes the revised contents of the draft report, as well as preliminary architectural plans and specifications for the subsequent rehabilitation; a detailed cost estimate and a proposed budget for the work. SHPO office requires one paper copy and one digital copy as a deliverable.

INSTRUCTIONS TO BIDDERS

1. BID SUBMISSION

All bids are to be forwarded to the Selectmen's Office, 40 Main Street, North Stonington, CT 06359 by October 2 at 1:00 P.M. at which time and place the bids will be publicly opened and read. A mandatory walk through of the property, located at 14 Hewitt Road, will be held September 16 at 9:00am.

2. SEALED ENVELOPE

Bids must be submitted on the attached form and submitted in a seal envelope clearly labeled: Conditions Assessment and Feasibility Study – John Dean Gallup House

3. MINIMUM INSURANCE REQUIREMENTS

The selected contractor shall agree to maintain in force at all times during which services are to be performed the following coverage placed with a company(ies) licensed to do business in the State of Connecticut:

| | | |
|---------------------------------|---|-------------|
| General Liability* | Each Occurrence | \$1,000,000 |
| | General Aggregate | \$2,000,000 |
| | Products/Completed Operations Aggregate | \$2,000,000 |
| Auto Liability* | Combined Single Limit | |
| | Each Accident | \$1,000,000 |
| Umbrella* (Excess Liability) | Each Occurrence | \$1,000,000 |
| | Aggregate | \$1,000,000 |
| Professional Liability | Each Occurrence | \$1,000,000 |
| | Aggregate | \$1,000,000 |

A certificate of insurance naming the Town of North Stonington as an additional insured shall be required commencing work.

| | | |
|---|-------------------------|-----------|
| Workers' Compensation and Employers' Liability | WC Statutory Limits | |
| | EL Each Accident | \$500,000 |
| | EL Disease Each Employ | \$500,000 |
| | EL Disease Policy Limit | \$500,000 |

4. BID AWARD

The Town of North Stonington reserves the right to reject any and all bids that are not in the best interest of the Town. All bids must be valid for at least 60 days.

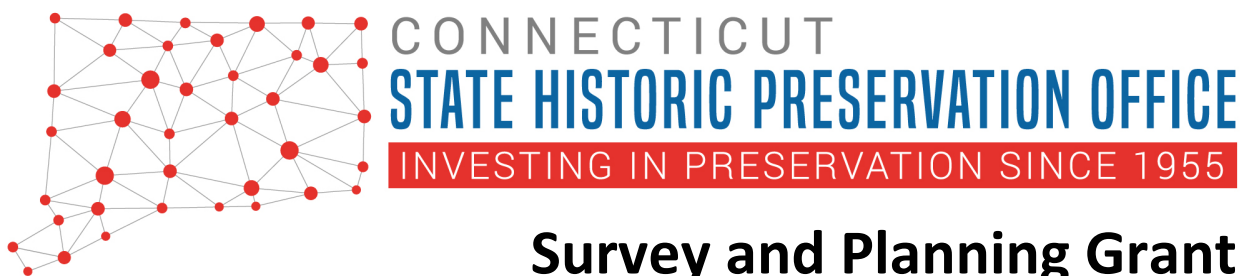
5. QUESTIONS

Address all questions to Selectmen’s Office selectmen@northstoningtonct.gov . A mandatory walk through of the properties will be held September 16 at 9:00am starting at the John Dean Gallup House, 14 Hewitt Road, North Stonington. All questions must be submitted by September 23 and answers will be posted on the website. Respondent is responsible for verifying scope of work.

6. Affirmative Action – Equal Opportunity Employer. Women and Minorities are encouraged to submit a proposal.

7. The project is funded by grant funds from the Community Investment Account of the State of Connecticut, as administered by the Department of Economic and Community Development, State Historic Preservation Office (SHPO). Work must be done in accordance with SHPO standards and meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties and be prepared by a consultant team that meets the federal qualifications standards under 36 CFR Part 61 for Historical Architect.

**ATTACHMENT 1:
SHPO SURVEY AND PLANNING GRANT APPLICATION 2019**



Survey and Planning Grant

Application

2019

Survey and Planning Grant | *Application*

Applicant Information

Municipality/Organization:

Town of North Stonington

Chief Elected Official/Executive Director:

Michael Urgo, First Selectman

Federal Employer ID Number:

06-6002055

Street Address:

Old Town Hall, 40 Main Street

City/Town:

North Stonington

State:

CT

ZIP Code:

06359-1612

Contact Information

Contact Name:

Craig Russell

Email Address:

grants@northstoningtonct.gov

Phone Number:

(860) 432-5646

Mailing address (if different from above):

City/Town:

State:

ZIP Code:

This contact information will be used for all questions and mailings related to the grant process.

Project Information

Identify the grant activity you applying for:

- Historic Resources Inventory
- Archaeological Survey or Report
- Historic Designation Report or Nomination
- Municipal Historic Preservation Planning Reports
- Pre-development Studies
- Partners In Preservation

1. Brief description of the project:

A conditions assessment and feasibility study of the John Dean Gallup house.

2. Grant Amount Request:
\$20,000

Total Project Cost:
\$20,000

3. Identify historic designation status of the resource affected by this project (check all that apply):

- National Historic Landmark
- National Historic Landmark, District: _____
- National Register of Historic Places
- National Register of Historic Places, District: _____
- State Register of Historic Places
- State Register of Historic Places, District: _____
- Local Historic Property
- Local Historic District: _____

4. Identify the applicant:

- municipality 501(c)3 nonprofit 501(c)13 nonprofit

If the applicant is a 501(c)3 or 501(c)13, submit a copy of the IRS Status Determination letter.

5. Is this a subsequent phase of a project?

- yes no

If yes, explain:

N/A

6. Has the applicant received previous grants from SHPO?

yes no

If yes, please list all grants received (include grant type, date awarded, and award amount):

N/A

7. Does the applicant own or lease the property?

own lease

If the property is leased, does the applicant have a long-term lease of at least 20 years as of the date of the application?

yes no

If the property is leased, have notarized statements been obtained from the owner/s of the property that permit the applicant to submit this application and complete the project?

yes no

N/A

Explain _____

Please submit a copy of the Certificate of Title or lease and applicable notarized statements.

Authorization

Name of Authorized Official:
Juliet Hodge

Title:
Planning, Zoning, and Development Official

Signature: DocuSigned by:

Juliet A Hodge

A3A649060D304F8...

Date: 6/26/2020

The authorized official is the individual identified in the Certified Resolution as empowered to carry out the grant application and associated agreements on behalf of the organization/municipality.

Legislative Information

U.S Representative's Name:
Joe Courtney

District #:
2nd

State Senator's Name:
Heather Somers

District #:
18th

State Representative's Name:
Kate Rotella

District #:
43rd

Application Checklist

This checklist should be submitted with the application. All material listed is required unless otherwise noted. See the Application Guidelines for an explanation of each item.

| | Included | N/A | Comments |
|--|-------------------------------------|-------------------------------------|-----------------------------|
| A. Project Abstract | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| B. Project Narrative | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| C. Photographs | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| D. Project Timeline | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| E. Budget | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| F. Budget Narrative | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| G. Long-term preservation plan (for pre-dev. Grants) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Informal Plan |
| H. 501(c)3 or 501(c)13 IRS tax status determination letter (<i>contingent</i>) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Municipal Government |
| I. Certified Resolution | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| J. Vendor Profile Form and W-9 | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Previously Submitted |
| Certificate of title or long-term lease agreement (if applicable) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| Letters of Support (optional) | <input type="checkbox"/> | <input type="checkbox"/> | |

John Dean Gallup House Condition Assessment and Feasibility Study

Funder applying to: State Historic Preservation Office

Date submitted: 6/26/2020

Applicant Information

Applicant Organization: Town of North Stonington
 Street Address: 40 Main Street
 City, State, Zip Code: North Stonington, CT 06359
 Applicant Contact Name: Craig Russell
 Applicant Contact Title: Grant Writer
 Phone Number: (860) 432-5646
 Email Address: grants@northstoningtonct.gov
 Authorized Official Name: Juliet Hodge
 Authorized Official Title: Planning, Development, & Zoning Officer
 Phone Number: (860) 535-2877
 Email Address: jhodge@northstoningtonct.gov
 FEIN Number: 06-6002055
 Date of Incorporation: 1807

Project/Program Information

Name of Project/Program: John Dean Gallup House Feasibility Study
 Total Project Budget: \$20,000
 Total Funding Secured: \$0
 Amount of This Request: \$20,000
 Project Start Date: TBD
 Project Completion Date: TBD

Does the Town have federal tax-exempt status? Yes No. If no, please explain:

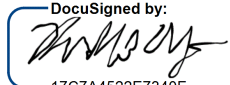
As a governmental unit of the State of Connecticut, charitable contributions are tax-deductible under section 170 (c) (1) of the Internal Revenue Code if made for a public purpose.

Has the governing body approved a policy which states that the Town does not discriminate as to age, race, religion, sex, or national origin? Yes No

Has the Town's chief executive officer authorized this request? Yes No

An officer of the Town's governing body must sign this application:

The undersigned, an authorized officer of the Town of North Stonington, does hereby certify that the statements contained in the responses to this application and accompanying documents are true to the best of my knowledge and belief and that I know of no reason why the applicant cannot complete the project in accordance with the representations contained herein.

DocuSigned by:

 1767A4522E7340F...
 Signature

Michael Urgo, First Selectman
 Print Name / Title

6/26/2020
 Date

**Project Narrative
John Dean Gallup House
Condition Assessment and Feasibility Study**

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Project Abstract John Dean Gallup House Condition Assessment and Feasibility Study

1.0 Project Abstract

The John Dean Gallup house was built by the Gallup family and is an important part of North Stonington's history. The house is believed to have been built in 1732 and was likely constructed by Nathaniel Gallup II. The house is located on the 104-acre Hewitt Farm property on Route 2 in North Stonington, Connecticut, and is a significant eighteenth century house listed on the Connecticut State Register of Historic Places. Though the residence has been modified over the years by additions, it is still a fine example of an early post and beam, center chimney cape style house.

In the 1920s Charles and Flora Hewitt purchased this property and over the years they caringly improved it and added nearby land. In 1967 Flora Hewitt deeded the farm to the Marine Historical Association (Mystic Seaport) with restrictions that ensure its preservation. The Seaport owned and used it for various purposes, including allowing staff to live on site.

In 2008, the Town of North Stonington purchased the Hewitt Farm property from Mystic Seaport. At the time the property was purchased, the house was being rented to a family connected to the Seaport. In the summer of 2018, the Town made the decision not to renew the lease in order to work on interior and exterior renovations needed by the house.

To build upon the renovation efforts, and determine the best future use of the subject structure, the Town wishes to acquire the services of a 36 CFR Part 61 qualified Historical Architect, skilled in historic building preservation and renovation to prepare a conditions assessment and feasibility study to determine the current condition of the John Dean Gallup House and its carriage barn, as well as evaluate reuse options. The final report will include the contents of the draft report (detailed in Section 2(E) below). Upon completion of the study, the Town intends to follow through with the recommendations for renovation and thereafter make the house available to the public.

Project Timeline

John Dean Gallup House

Condition Assessment and Feasibility Study

2.0 Project Narrative

A. Briefly describe your organization and primary mission.

North Stonington, incorporated in 1807, has a population of slightly more than 5,000 residents spread out over 55 square miles of rural countryside with abundant natural resources, farmland, historic features and scenic vistas. There are numerous historic buildings throughout town, and all the buildings within the “historic village” of North Stonington, formerly known as “Milltown” are listed on the National Register of Historic Places.

The Town’s overall mission can be best captured in the goals and objectives identified in the Town’s current Plan of Conservation and Development which are centered around the themes of *livability, sustainability, progress, and community*. Goals specific to historic preservation are included in this plan and call for greater effort to promote, enhance and protect historic structures and resources in recognition of their fundamental importance for maintaining North Stonington’s identity, heritage and sense of place. Other goals specifically encourage the renovation and reuse of historically significant structures; and the expansion of education efforts in order to raise awareness and to foster a cooperative community-wide approach to preserving the town’s historic resources.

B. Describe the John Dean Gallup House and its significance. Is it listed on the State or National Register of Historic Places?

The John Dean Gallup house was built by the Gallup family and is an important part of North Stonington’s history. The house is believed to have been built in 1732 and was likely constructed by Nathaniel Gallup II. The house is named after John Dean Gallup, the grandson of Nathaniel. John Dean Gallup was born in the house in 1787 and died in the house in 1871. He was a hero of the battle of Stonington Point during the War of 1812.

The house is a significant eighteenth century house listed on the Connecticut State Register of Historic Places. When the Town was considering the purchase of the Hewitt Farm property in 2008, the First Selectman requested an *Eastern Connecticut Environmental Review Team Report* to better evaluate the 104-acre property. In the Archeological and Historical Review section of this report, it was noted “In particular, the Hewitt House (*Gallup House*) possesses historical and architectural importance and may be eligible for the National Register of Historic Places. The State Historic Preservation Office (SHPO) strongly encourages the preservation, sensitive rehabilitations, and continued use of this historic structure as well as the conservation of its immediate setting.” A member of the North Stonington Historical Society has been helpful with some of the research done-to-date.

The house is a fine example of an early center chimney cape style house. It is a low, broad, one and one half-story post and beam frame building with a moderately steep pitched, gabled roof. It has a large central chimney holding three stone hearths and a bake oven. The house has been modified over the years including three (3) later additions, but the north-facing keeping room and the two south-facing best rooms have been kept mostly as they were in the early days.

Project Timeline John Dean Gallup House Condition Assessment and Feasibility Study

C. What issue will your project address? How was the issue identified?

In 2008, the Town of North Stonington purchased the Hewitt Farm property from Mystic Seaport. At the time the property was purchased, the house was being rented to a family connected to the Seaport. In the summer of 2018, the Town made the decision not to renew the lease in order to undertake significant interior renovations and make the house a valuable part of the community.

In 2019 and early 2020, the Hewitt Farm Committee had the house inspected for problem areas and as a result replaced a flat section on the roof to protect from heavy storms, repainted the entire interior to protect against lead exposure from peeling paint and plaster, and made significant improvements to the three (3) bathrooms.

To build upon its renovation efforts, and determine the best future use of the subject structure, the Town wishes to acquire the services of a 36 CFR Part 61 qualified Historical Architect skilled in historic building preservation and rehabilitation to prepare a conditions assessment and feasibility study of the John Dean Gallup house.

The conditions assessment will help the Hewitt Farm Committee continue their renovation efforts more efficiently by focusing their limited resources on projects specifically recommended in the report.

The feasibility study will also help determine the appropriate use of the property. The John Dean Gallup House is currently unoccupied increasing risk of theft, vandalism, deterioration, or un-noticed structural or water damage, etc. To fill this void and protect the valuable historic asset, the Town recently put out an RFP in search of a qualified candidate to rent and preserve the historic integrity of the residence. No proposals were submitted. The study will help define the appropriate end user so that the Town can target its solicitation efforts to lease the property.

D. Who will manage the project?

This project will be managed by the 36 CFR-qualified profession or other qualified firm hired to conduct the condition assessment and feasibility study. The consultant(s) will work closely with the Hewitt Farm Committee who are responsible for managing the facility on a day to day basis and in coordination with Juliet Hodge, the Planning, Development and Zoning Officer for the Town of North Stonington. The point person for the project will be Juliet Hodge as she has been working closely with the Hewitt Farm Committee.

E. What specific activities will be carried out with the grant funds?

The Town wishes to acquire the services of a 36 CFR Part 61 qualified Historical Architect skilled in historic building preservation and rehabilitation to prepare a conditions assessment and feasibility study of the John Dean Gallup house. The scope of work for said study will consist of the following:

- An assessment of the existing condition of the structure and costs related to its stabilization and rehabilitation.
- An analysis of the reuse potential of the subject property with several scenarios for reuse and a recommendation of the most viable reuse option.

Project Budget John Dean Gallup House Condition Assessment and Feasibility Study

- Preparation of a draft report that includes: a) An introduction that outlines the purpose of the study, site description, chronology and historical overview of the subject property; b) An analysis of the current physical condition of the property, as well as associated costs of renovations and/or repair; c) A description of reuse scenarios and associated issues; and d) A financial analysis that details expected rehabilitation costs for reuse alternatives.
- Presentation of the draft report to the Town and community stakeholders for review and comment. Written responses to review comments shall be incorporated into the final report.
- Preparation of a final report that includes the revised contents of the draft report.

F. Who will benefit from your project?

This project and subsequent phases of restoration will benefit the Hewitt Farm Committee and the public at large. The Hewitt Farm Committee has limited funds for capital improvements. This condition assessment and feasibility study will assist the Committee to prioritize the order and type of renovations to be undertaken. The study will also help determine the appropriate use of the property; a use that preserves the historical character of the residence and is sensitive to the Hewitt Farm property as a whole. The study will be of benefit to the end user selected to lease the residence and the public at large when the residence is made available to the public for viewing and special events.

G. What product will be produced with the grant funds?

The product produced will be a conditions assessment and feasibility study of the John Dean Gallup House. The final report will consist of a) An introduction that outlines the purpose of the study, site description, chronology and historical overview of the subject property; b) An analysis of the current physical condition of the property, as well as associated costs of renovations and/or repair; c) A description of reuse scenarios and associated issues; and d) A financial analysis that details expected rehabilitation costs for reuse alternatives.

H. How will the grant funded project be shared with the public?

The Consultant will prepare a presentation of its findings to the Hewitt Farm Committee at one of its regularly scheduled meetings. The Hewitt Farm Committee Meetings are open to the public and the public will be made aware of such presentation and attendance will be encouraged.

I. How will you measure the success or impact of the project?

The success of this project will be measured by cost savings. The condition assessment will prioritize the work to be completed and the Hewitt Farm Committee will focus its resources on repair and maintenance measures toward the long-term preservation of the residence. Success will also be measured by the Town's ability to lease the residence to a qualified candidate committed to maintaining the historic integrity of the property, while also providing the Town with a source of steady revenue (rental payments).

**Project Budget
John Dean Gallup House
Condition Assessment and Feasibility Study**

3.0 Project Timeline

Provide a detailed schedule of the project timeline, including estimated start and completion dates.

The Town of North Stonington will solicit bids within 30 days of receiving a notice to proceed from the State Historic Preservation Office. The RFP will define a project timeline of 6 months to complete the conditions assessment and feasibility study.

**Project Budget
John Dean Gallup House
Condition Assessment and Feasibility Study**

4.0 Project Budget Detail

A. Budget Detail

| | Grant Share | Applicant Share | Total |
|--------------|--------------------|------------------------|-----------------|
| A/E Fee | \$20,000 | \$0 | \$20,000 |
| Total | \$20,000 | \$0 | \$20,000 |

B. Budget Narrative

The total project budget will go to soft costs associated with the fees related to the production of the condition assessment and feasibility study for the John Dean Gallup House located on the Hewitt Farm in North Stonington, Connecticut.

Preservation Plan John Dean Gallup House Condition Assessment and Feasibility Study

6.0 Preservation Plan

In lieu of a formal preservation plan, describe major preservation projects undertaken in the last 3-5 years and any projects in the pipeline. If applicable, also describe the maintenance / preservation staff and or committees responsible for caring for the building.

A Long-Term Preservation Plan has not been established for this property. However, the Town, through the efforts of its Hewitt Farm Committee, has taken steps to preserve the John Dean Gallup house. The following is a list of efforts taken to preserve the property:

- Replacement of a portion of the carriage barn roof.
- Removal of small deck at west facing façade that was causing water damage to structural elements.
- Rebuilding of the cupola.
- Replacement of sill under west wall with structural beam.
- Replacement of a leaking flat roof section on house.
- Repairs and refinishing of the interior surfaces of all rooms in the house.
- Remediation of lead bearing paint surfaces in the house interior through encapsulation.
- Replacement of plumbing fixtures in the bathrooms in the house.
- Installation of a new gas water heater.
- Installation of fire detectors.
- Removal of several trees surrounding the house that were in poor health and endangering the structure.

Ongoing maintenance of the house is managed by the Hewitt Farm Committee.

Attachments
John Dean Gallup House
Condition Assessment and Feasibility Study

Attachment I – John Gallup House Photographs



**Welcome
to the John Dean Gallup House**



A view of the east-facing façade showing the profile of the gable end of the original cape structure, as well as a view of the pitched roof and façade of a later addition with its covered porch.



**The Keeping Room with its cooking fireplace.
The right and left entry doors open
into the two front "Best" rooms.**



The far end of the Keeping Room is a later addition.



The western front “*best room*” with its cabinetry and the eastern front “*best room*” with a fancier mantel open into the front door entryway.





The kitchen is at the back of the house in what is likely the newest addition.



The staircase, in the front door entry area, leads to a large bedroom upstairs



This large upstairs bedroom has a fireplace. It is likely that most of the work done here was when Mystic Seaport owned the building from 1967 - 2008.



**Behind the house is a “Carriage House”.
To date we have little information about its history.**



the John Dean Gallup house
Connecticut State Historic Register
built in 1732

Attachments
John Dean Gallup House
Condition Assessment and Feasibility Study

Attachment II – IRS Tax Status Letter



CINCINNATI OH 45999-0038

In reply refer to: 0248205449

May 15, 2017 LTR 4076C 0

06-6002055 000000 00

00016653

BODC: TE

TOWN OF NORTH STONINGTON
SELECTMENS OFFICE
40 MAIN ST
N STONINGTON CT 06359-1612

Federal Identification Number: 06-6002055
Person to Contact: Customer Service
Toll Free Telephone Number: 1-877-829-5500

Dear Taxpayer:

This responds to your request for information about your federal tax status. Our records do not specify your federal tax status. However, the following general information about the tax treatment of state and local governments and affiliated organizations may be of interest to you.

GOVERNMENTAL UNITS

Governmental units, such as States and their political subdivisions, are not generally subject to federal income tax. Political subdivisions of a State are entities with one or more of the sovereign powers of the State such as the power to tax. Typically they include counties or municipalities and their agencies or departments. Charitable contributions to governmental units are tax-deductible under section 170(c)(1) of the Internal Revenue Code if made for a public purpose.

ENTITIES MEETING THE REQUIREMENTS OF SECTION 115(1)

An entity that is not a governmental unit but that performs an essential government function may not be subject to federal income tax, pursuant to Code section 115(1). The income of such entities is excluded from the definition of gross income as long as the income (1) is derived from a public utility or the exercise of an essential government function, and (2) accrues to a State, a political subdivision of a State, or the District of Columbia. Contributions made to entities whose income is excluded income under section 115 may not be tax deductible to contributors.

TAX-EXEMPT CHARITABLE ORGANIZATIONS

An organization affiliated with a State, county, or municipal government may qualify for exemption from federal income tax under section 501(c)(3) of the Code, if (1) it is not an integral part of the government, and (2) it does not have governmental powers inconsistent with exemption (such as the power to tax or to exercise enforcement or regulatory powers). Note that entities may meet the requirements of both sections 501(c)(3) and 115 under certain circumstances. See Revenue Procedure 2003-12, 2003-1 C.B. 316.

001980

0248205449
May 15, 2017 LTR 4076C 0
06-6002055 000000 00
00016654

TOWN OF NORTH STONINGTON
SELECTMENS OFFICE
40 MAIN ST
N STONINGTON CT 06359-1612

Most entities must file a Form 1023, Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code, to request a determination that the organization is exempt from federal income tax under 501(c)(3) of the Code and that charitable contributions are tax deductible to contributors under section 170(c)(2). In addition, private foundations and other persons sometimes want assurance that their grants or contributions are made to a governmental unit or a public charity. Generally, grantors and contributors may rely on the status of governmental units based on State or local law. Form 1023 and Publication 4220, Applying for 501(c)(3) Tax-Exempt Status, are available online at www.irs.gov/eo.

We hope this general information will be of assistance to you. This letter, however, does not determine that you have any particular tax status. If you are unsure of your status as a governmental unit or state institution whose income is excluded under section 115(1) you may seek a private letter ruling by following the procedures specified in Revenue Procedure 2007-1, 2007-1 I.R.B. 1 (updated annually).

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely yours,



Kim A. Billups, Operations Manager
Accounts Management Operations 1

Attachments
John Dean Gallup House
Condition Assessment and Feasibility Study

Attachment III – Certified Resolution



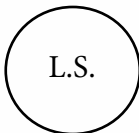
Town of North Stonington
Board of Selectmen
40 Main Street, North Stonington, CT 06359

Certified Resolution

I, Antoinette Pancaro, Town Clerk of the Town of North Stonington, do hereby certify that the following is a true and correct copy of a resolution duly adopted at a meeting of the Board of Selectmen of the Town of North Stonington, duly held on June 23, 2020, at which meeting a duly constituted quorum of the Board of Selectman was present and acting throughout and that such resolution has not been modified, rescinded or revoked and is at present in full force and effect:

RESOLVED, that , Juliet Hodge, who is the , Planning, Development and Zoning Official of the Town of North Stonington, is empowered to execute and deliver in the name and on behalf of the Town of North Stonington a certain contract with the State of Connecticut, Department of Economic and Community Development, and to affix the corporate seal, if any.

In Witness whereof, the undersigned has affixed his/her signature and the corporate seal of this corporation, if any, this the 25th day of June, 2020.



Antoinette Pancaro
Signature

Antoinette Pancaro, Town Clerk, North Stonington

June 25, 2020