

# MEMO

**To:** File – Franks House  
**From:** HLC Staff  
**Date:** July 28, 2022

**Re:** Comments from State Historic Preservation Office on Designation Report for Franks House, Charlotte

By email dated July 26, 2022, SHPO staff provided feedback based on their review of the Designation Report for the Franks House. In summary, the issues raised included the following:

- Citation revisions for oral interviews referenced in the report;
- Caption and labelling revisions for photographs included within the report;
- Correction of typographical and grammatic errors;
- Additional consideration and discussion as to the criteria for architectural integrity and the applicability of those criteria to the house; and
- Clarification as to the separation of the Dunbar Street neighborhood from the rest of Third Ward by the construction of the John Belk Freeway (Interstate 277).

Following review of the Designation Report and the SHPO feedback, the HLC staff revised and updated the Designation Report to address the issues raised. With respect to the architectural integrity of the Franks House, HLC staff has relied upon the guidance of the National Council on Public History (NCPH) pertaining to historic structures from underrepresented communities. Per the NCPH, undue emphasis should not be placed on architectural integrity of such structures in light of the circumstances of their construction and the economic circumstances in which these populations typically existed: “Too often . . . when considering a place with ties to an underrepresented community, compromised elements of design, materials, and workmanship are cited as evidence that it lacks sufficient integrity for [recognition]. Yet design, materials, and workmanship may not be the most important aspects of integrity for resources associated with historically marginalized communities. Stories related to location, setting, feeling, and association are usually more relevant.” Given the removal of Black neighborhoods from Charlotte’s central core and the ensuing scarcity of historical assets representing the Black community that once thrived in Third Ward, HLC staff believes the integrity of location, feeling, and association embodied by the Franks House outweighs any compromised materials, workmanship, setting, or design elements of the structure, rendering the Franks House both historically and architecturally relevant and thereby uniquely qualified for landmark designation.