

**United States Department of the Interior**  
National Park Service

# National Register of Historic Places Registration Form

## 1. Name of Property

Historic name: Capital Plaza Hotel

Other names/site number: Holiday Inn Capital Plaza, FRF 577

Name of related multiple property listing: NA

## 2. Location

Street & number: 405 Wilkinson Boulevard

City or town: Frankfort State: Kentucky County: Franklin

Not For Publication:  Vicinity:

## 3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this X nomination \_\_\_ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property X meets \_\_\_ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

\_\_\_ national \_\_\_ statewide X local

Applicable National Register Criteria:

X A \_\_\_ B \_\_\_ C \_\_\_ D

\_\_\_\_\_  
Signature of certifying official/Title: **Craig Potts/SHPO** Date

\_\_\_\_\_  
**Kentucky Heritage Council/State Historic Preservation Office**\_\_\_\_\_

State or Federal agency/bureau or Tribal Government

In my opinion, the property \_\_\_ meets \_\_\_ does not meet the National Register criteria.

\_\_\_\_\_  
Signature of commenting official:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title :

\_\_\_\_\_  
State or Federal agency/bureau  
or Tribal Government

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

**4. National Park Service Certification**

I hereby certify that this property is:

- entered in the National Register
- determined eligible for the National Register
- determined not eligible for the National Register
- removed from the National Register
- other (explain:) \_\_\_\_\_

\_\_\_\_\_  
Signature of the Keeper

\_\_\_\_\_  
Date of Action

**5. Classification**

**Ownership of Property**

- Private:
- Public – Local
- Public – State
- Public – Federal

**Category of Property**

- Building(s)
- District
- Site
- Structure
- Object

**Number of Resources within Property**

Contributing	Noncontributing	
<u>1</u>	_____	buildings
_____	_____	sites
_____	_____	structures
_____	_____	objects
<u>1</u>	_____	Total

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

Number of contributing resources previously listed in the National Register NA

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**6. Function or Use**

**Historic Functions**

DOMESTIC/hotel

**Current Functions**

DOMESTIC/hotel

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**7. Description**

**Architectural Classification**

MODERN MOVEMENT/New Formalism

**Materials:**

Principal exterior materials of the property:

Foundation: CONCRETE

Walls: CONCRETE, STUCCO

Fenestration: METAL/Aluminum and Steel

Roof: SYNTHETIC

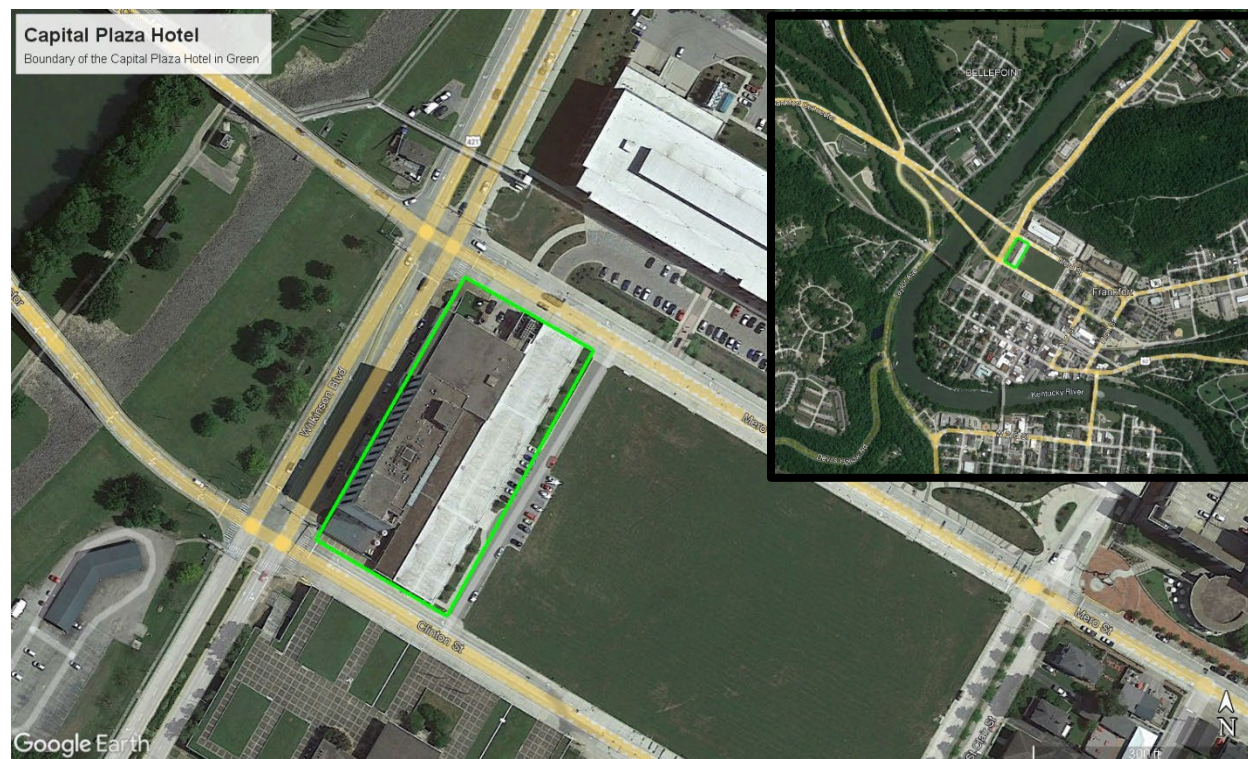
Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

## Narrative Description

### Summary Paragraph

The Capital Plaza Hotel (FRF-577) is a ten-story hotel constructed in 1983 in the New Formalist style. The building is located at 405 Wilkinson Boulevard on the east side of the road and situated between Mero and Clinton Streets in North Frankfort. The property proposed for listing is a 1.86-acre area, sitting within a parcel that measures 7.84 acres, which includes just the footprint of the building itself (Figure 1). The Period of Significance is 1983, signifying the year that the hotel opened.



*Figure 1. Boundaries of the Capital Plaza Hotel, as shown on an aerial map (Google Earth). Location within the City of Frankfort can be seen in the inset corner callout.*

The Capital Plaza Hotel is situated in North Frankfort, north and west of the established, densely developed, historic downtown area. The building is east of the Kentucky River, which flows at the base of the two West Frankfort Connector vehicular bridges (Figure 2). The area immediately surrounding the Capital Plaza Hotel consists of other remnants of the mid-twentieth century urban renewal efforts that spawned the Capital Plaza development project and other large-scale, modern governmental buildings. To the south and east lies the Central Frankfort Historic District (NR #09000570), which combined three earlier district listings: the Corner in Celebrities Historic District (NR #71000343), the Old Statehouse Historic District (NR #80001529), and the Frankfort Commercial Historic District (NR #79000986).<sup>1</sup> These districts consist of some of the most

<sup>1</sup> National Register of Historic Places, Central Frankfort Historic District, Jefferson County, Kentucky, National Register #09000570; National Register of Historic Places, Corner in Celebrities Historic District, Jefferson County,

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

historically significant resources within Frankfort such as the Old Statehouse, residences of historically significant Kentuckians, and the historic downtown.

The area immediately surrounding, and including, the Capital Plaza Hotel has changed significantly over the last century. The land on which the Capital Plaza Hotel and the rest of the Capital Plaza development was constructed was once an ethnically diverse and cohesive community of freed men and women and lower-income families dating back to the years immediately following the Civil War through the turn of the twentieth century. This area was flood prone, and came to be known locally as Crawfish Bottom, or more frequently referred to as either the “Craw” or “Bottom.” In 1958, the Frankfort City Commission sought a contract with the federal government for urban renewal efforts in the city to be situated on this land that many of Frankfort’s elites deemed a blight. As such, by 1965, almost the entirety of the fifty plus acre area known as the Craw had been cleared to make way for the new Capital Plaza development, which was protected by a floodwall. In the years since this project’s completion, marked with the construction of the Capital Plaza Hotel, the landscape has changed substantially again, most notably in the past decade with the destruction of three of the Plaza’s core buildings—the Capital Plaza Office Tower, the Convention Center, and the Fountain Place Shoppes. Today, the site of the demolished buildings is highlighted by the large empty grassy lot to the east of the Hotel and the new Mayo-Underwood State building to the north.

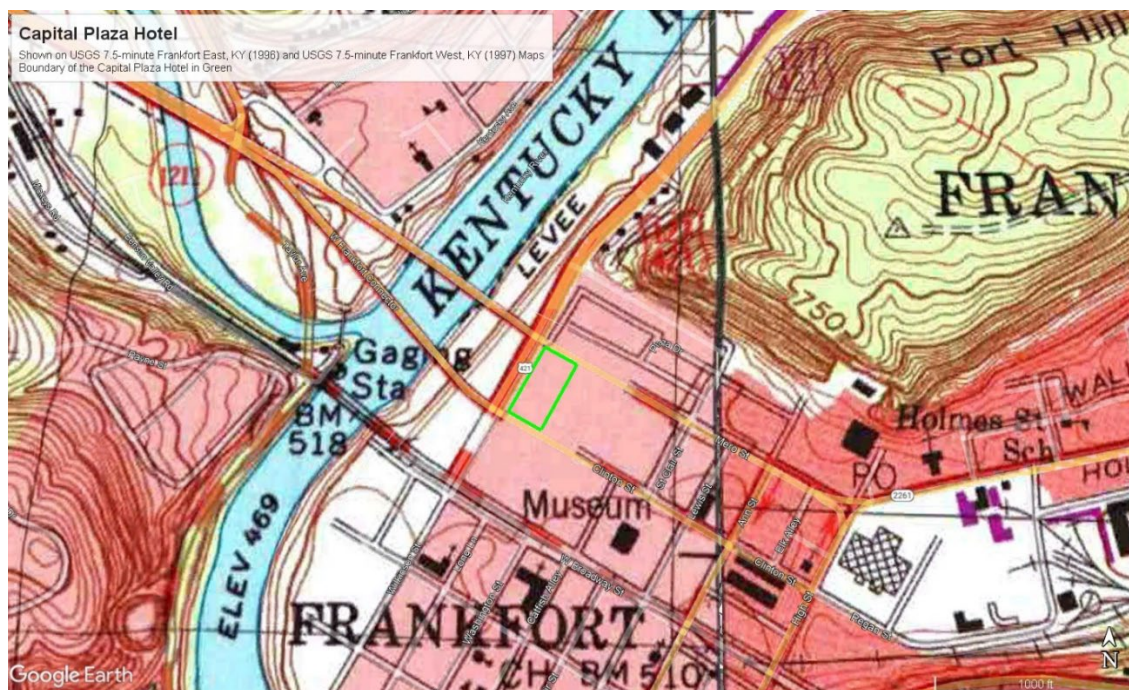


Figure 2. Location of the Capital Plaza Hotel (Green), as shown on the USGS 7.5-minute Frankfort East, KY and 7.5-minute Frankfort West, KY maps (USGS 1996; USGS 1997).

Kentucky, National Register #71000343; National Register of Historic Places, Old Statehouse Historic District, Jefferson County, Kentucky, National Register #80001529

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

## Narrative Description

### *Site Layout and General Characteristics*

The Capital Plaza Hotel spans the entire city block between Mero and Clinton Streets on the east side of Wilkinson Boulevard. The building is not oriented to the cardinal compass points; the front opens to the northwest. In this form, that front will be referred to as the west side for simplicity. The 10-story building has a shallow setback off Wilkinson alongside the sidewalk. The building features a large, one-story, projection with an underground parking structure off the rear (east) the full length of the building. A shed-roofed, one-story extension off the south façade with a glass roof houses an indoor pool, and a larger, flat-roofed one-story extension off the north façade houses the meeting rooms and conference spaces. The main portion of the building dominates the western half of the block and is ten stories in height with a flat roof that reaches one level taller on the southern end. The building's design is indicative of the Modern Movement in architecture and features the traditional three-part construction with a base, shaft, and cornice. The high-rise portion of the building houses the hotel rooms, and is defined by the verticality, which is achieved by the bands of windows. The wider base is distinct in its design and function, as it contains public spaces with larger window openings and a more utilitarian appearance. The cornice of the building is defined by the horizontal bands of windows, which offer a stark difference to the vertical nature of the shaft. The building as a whole lacks significant architectural ornamentation, which is characteristic of the Modern style.



*North and West Façades, camera facing south*



*West and south façades, camera facing east*

The west (main) façade is dominated by the ten-story portion of the building to the south with an off-center, raised entryway accessible via a stairway in front and wheelchair ramps on either side. The entryway is covered by an awning that is supported by two large square columns with some vertical fluting reminiscent of the vertical lines in the exterior walls around the rest of the buildings. These serve as some of the only aesthetic adornment to the building, aside from the overall design and arrangement of its features. The first story is noticeably taller and devoid of fenestration except for two large window openings just north of the entryway, and three on the one-story northern extension, which houses the convention area and conference rooms, which also protrudes out toward the street on this facade and has three identical large window openings. Each of the large window openings contains a band of five, large, fixed windows. The shed-roofed extension on the

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

south end, which houses the indoor swimming pool, is enclosed by fixed windows above a concrete half wall. The façade of the building's shaft is divided by 16 vertical bands of paired windows, associated with floors two through eight. The ninth floor is highlighted with wider window openings that mark the top of the vertical bands while the tenth-floor features eight, horizontal window openings, each corresponding to two of the vertical bands on the floors beneath. At the south end of the west façade, the building extends one more level that is accentuated by two open-air window openings that match the width of those on the tenth floor. Slight embellishments on the west façade include Capital Plaza Hotel signage centered on the ten-story portion of the building above the tenth-floor window openings and minimal decoration in the concrete walls resulting in a band of vertical rectangles on the first level and bands of inlaid rectangles above the ninth and tenth-story windows.

### ***South Façade***

The south façade of the main portion of the hotel is almost completely devoid of ornamentation aside from the one-story shed-roofed extension with a wall of alternating fixed and sliding windows atop a concrete half wall, and three levels of horizontal windows corresponding to the three highest levels of the tower, mirroring those on the west façade, including the extra, open-air extension. There is a small, one-story hyphen that is significantly recessed on the south façade that connects the main body of the hotel to the rear, one-story, flat-roof projection and parking structure. The rear projection is one-story in height and three bays wide, each of which is separated by a thick concrete pillar that supports the upper level/roof which extends out to shelter a covered walkway. The westernmost bay of the rear extension opens to allow vehicular access to underground parking spaces. The recessed wall, sheltered by the roof extension of the rear projection on the two eastern bays, has a set of metal double doors and some decorative concrete work that accentuates the verticality of the overall design.



**South Façade, camera facing northeast**



**East Façade, camera facing north**

### ***East Façade***

The east (rear) façade is dominated by the rear, 13-bay, one-story projection that spans the entire city block between Clinton and Mero Streets. Other than the two outer bays, each of which are filled in and feature access to a covered sidewalk along the two thoroughfares, and one interior bay, which provides a recessed, secondary entrance into the hotel, the remaining bays consist of

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

full-height, aluminum glass windows and doors. The rear façade of the hotel tower largely mirrors that of the west façade. The only differences lie in the absence of some of the columns of windows to accommodate the interior elevator and stairways.

### *North Façade*

The north façade of the ten-story portion of the building mirrors the south, as does the north façade of the rear projection. The westernmost section of the north façade is associated with the one-story northern extension of the hotel, and it is noticeably setback from the street to accommodate deliveries to the loading dock situated there.



*North Façade, camera facing southwest*



*Front entrance, West Façade*

### *Interior Description*

The interior of the Capital Plaza Hotel is similar to many other higher-class hotels with convention spaces. The interior is separated into three sections, with the first floor housing the common-space, meeting rooms, and other amenities, followed by several floors of hotel rooms, and lastly with the uppermost floors consisting of condominiums.



*Grand Entryway*



*Pool, South end of Hotel*



Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

A grand entryway greets the person entering the building through the doors that face west toward Wilkinson Boulevard, complete with raised seating area and a prominent glass wall with a waterfall. On the first floor, south from the entryway, is the welcome desk and a hallway leading to the one-story, enclosed indoor pool. The hallway has various other rooms off of it, such as offices, maintenance rooms, and bathrooms. On the north end of the first floor, there is more seating, the main bay of elevators, and a partially enclosed stairwell leading to the subterranean parking structure. Just west of the elevators, there is a hallway that is on a gradual incline that leads to the one-story projection off the north of the building that houses the meeting and convention spaces. There are multiple large meeting rooms off the eastern wall of this hallway, which hugs the exterior wall.



*Bar-Lounge*



*Hallway to Conference area*

Proceeding east, up a ramp and/or a small set of stairs, visitors are met with another impressive hallway with more seating and branches leading north and east. This portion of the building is the hyphen, visible in the architecture of the building, and dominated by the glass ceiling slanting west to east. Centered in this central hallway is a raised fountain, which the aforementioned waterfall pours into. To the north, the hallway leads to a series of rooms, mostly off-limits to guests, and the bar/restaurant area, which is slightly recessed just northeast of the fountain. The eastern hallway leads to the building's rear (east) one-story projection and a series of rooms and secondary, exterior entryways.

All of the floors above the first floor are identical, or very similar. These upper levels are all living spaces, most of which are hotel rooms while some have been converted into condominiums. Each of these floors consists of a bay of elevators, and a central hallway with doorways on either side for its entire length. Again, most of these doors are used for the hotel rooms/condominiums, but some have other uses, such as expected hotel amenities (ice and vending machines) and maintenance/cleaning services.

#### *Changes to the Building Since the Period of Significance*

There have been no substantial changes to the building's interior or exterior since its construction, outside of routine maintenance, updating surfaces and systems, and cosmetic alterations to interior

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

spaces. The exterior looks the same, which is indicative of the method of construction, something that effectively dictates the appearance and does not allow for easy or practical alterations to be made to the fenestration or notable features. With the interior layout separated into three separate sections – common-space/meeting rooms/dining on the first floor, hotel rooms, and condominiums – it would be exceptionally difficult to undergo any significant alterations.



*Elevators*



*Hallway to rooms*



*Conference Room*



*Interior Hallway from Hyphen*

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

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## 8. Statement of Significance

### Applicable National Register Criteria

- A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Property is associated with the lives of persons significant in our past.
- C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D. Property has yielded, or is likely to yield, information important in prehistory or history.

### Criteria Considerations

- A. Owned by a religious institution or used for religious purposes
- B. Removed from its original location
- C. A birthplace or grave
- D. A cemetery
- E. A reconstructed building, object, or structure
- F. A commemorative property
- G. Less than 50 years old or achieving significance within the past 50 years

### Areas of Significance

COMMUNITY PLANNING AND DEVELOPMENT  
COMMERCE

### Period of Significance

1983

### Significant Dates

1983

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

**Significant Person**

NA

**Cultural Affiliation**

NA

**Architect/Builder**

Johnson Romanowitz (design)

Brian Morris of Morris-Powell (interior design)

Jones, Nace & Steinman, Inc (construction manager and general contractor)

Foster & Creighton Company (concrete work)

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

## Statement of Significance

### Summary Paragraph

The Capital Plaza Hotel (FRF 577) meets National Register Criterion A and Criterion Consideration G. The building is an exceptionally significant example of direct state involvement in economic development within Kentucky. The state government's involvement in stimulating local economies and assisting in development projects, both private and public, is not unique, in the sense that the state has been playing these roles for years. However, in the case of the Capital Plaza Hotel, the state took a significantly expanded role of direct partnership investment to encourage and assist private investment. This was a significant step further than in previous development models, and exposed the state to new and additional levels of risk, which it had never done previously for the financial benefit of private developers. There were ample warnings of the difficulties the project would face. Repeated false starts at development, repeated failures to entice local developers, and regular warnings of the project's infeasibility, all of which went unheeded. Despite these warnings, the state proceeded at the behest of private actors and local government, and most significantly of its own volition.

This nomination highlights other instances of the development of state-owned land, the traditional paths state governments take to get involved in private development, the unique circumstances of the Capital Plaza Hotel project, and how the heavy handedness of the government and state politics led to this unique development. In this instance, politics, state incentives, and the self-serving and influential nature involved in such a development in the capitol's backyard, combined to create a hotel that is almost too big for Frankfort and that essentially has a monopoly on the hospitality industry in Frankfort proper. Such a development has not been seen before in the Commonwealth of Kentucky and is unlikely to ever be seen again. The significance lies in the fact that while the state, who was pushing for the entire urban renewal development, tried to attract a hotel using the traditional avenues, but no private developers were interested, because they believed that the market could not support such an endeavor. There was a reason no private entity, driven and constrained by a profit motive, would build such a facility. In this case, these assumptions were accurate, but this did not stop the state providing unusual and extraordinary incentives to eventually attract someone. The state changed its business model in this instance, and it can be argued that they should not have. There is a reason that this is the only such case in Kentucky. The state ignored the private developers, the market, and the overall understanding of what could survive in Frankfort, and as a result, the final product floundered.

### Narrative Statement

#### *Development of Kentucky State-Owned Land: State Parks*

Developing state-owned land for economic growth is a commonplace practice seen throughout the country. One of the most obvious and prevalent instances in the Commonwealth of Kentucky can be seen in the development of state-owned land, particularly parks, to encourage tourism, park

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

accessibility, and provide economic benefits to the area. This was largely initiated in the mid-twentieth century with the creation of the “Modern” park system in Kentucky.<sup>2</sup>

From the creation of the first state parks in the late 1920s through the subsequent few decades, there were several occurrences at the national level that directly impacted Kentucky’s state park system and the Commonwealth’s role in developing and monetizing them. Shortly after the first four Kentucky state parks were created, the United States of America entered into the Great Depression. While the economic decline did not benefit the state park system much in and of itself, the entities that spawned from the subsequent New Deal programs did, most notably, the Civilian Conservation Corps (CCC). The CCC was tasked with assisting with the conservation and development of land owned by federal, state, and local governments, including state parks. In Kentucky, the CCC worked in several state parks improving infrastructure, fire prevention, construction of buildings, repair and reconstruction of hiking trails, and even archaeological surveys.<sup>3</sup> Throughout the nine years of its activity (1933-1942), the CCC completed improvement projects in nine Kentucky state parks.

While the onset of the Great Depression inadvertently caused improvement projects to occur throughout the Kentucky state park system, two other circumstances directly led to an upsurge in vacationers and patronage of the state’s parks: the popularization and increased accessibility to automobiles, and victories from labor organizing which resulted in paid vacations and enhanced wages for America’s workers of all classes.<sup>4</sup> As these two events unfolded, they combined to result in a rapid surge of travelers to America’s parks as families could now afford an automobile and finally had the paid time off needed to go on vacations.

In the mid-twentieth century, Kentucky sought to usher in a new age of state parks. This “modern” park system was initiated by politicians like Governor Earle Clements who recognized the growing trends of tourism and travel outlined above. In an effort to directly and financially benefit the state via tourism dollars, Clements selected Henry Ward, a senator and former newspaper editor, to be the Commissioner of Conservation and to actively promote the park system and construct more facilities for guests.<sup>5</sup> This was further prioritized in the 1950s as an emphasis was placed on family vacations where the mother was more involved in the key decisions. This meant that luxuries and amenities, such as swimming pools and color televisions were desired, regardless of destination. The new standards required by traveling families were well understood by “the decision-makers in Kentucky State Parks when planning their capital improvement programs in the post-war era.”<sup>6</sup>

From 1948 through 1955, Kentucky invested roughly \$10 million in the state park system itself, not counting the amount that was spent in promotion. In just one year in the early 1950s, Kentucky

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<sup>2</sup> National Register of Historic Places, Kentucky State Parks Multiple Property Submission, Various, Kentucky, National Register #1217480.

<sup>3</sup> Ibid; Castro-Bracho, Casey, “Projects of the Kentucky CCC” in *From the Archive*, Electronic Document, <https://history.ky.gov/news/projects-of-the-kentucky-ccc>, accessed November 2023.

<sup>4</sup> National Register of Historic Places, Kentucky State Parks Multiple Property Submission, Various, Kentucky, National Register #1217480.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid: E30.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

sent out over 100,000 promotional packets. The promotional campaign was successful. From 1946 to 1952, the state's tourist economy more than doubled.<sup>7</sup>

In 1960, Kentucky reimagined the development of its state parks. In an address to the state, then Governor Bert Combs outlined his plans for "developing Kentucky into the recreational center of America" with "the finest system of parks in the nation."<sup>8</sup> His illustration of a great park included new amenities, state of the art recreational facilities, and infrastructure to support all of it, not necessarily an emphasis on the beauty of Kentucky's scenery or the benefits to personal health. It was during this time that Kentucky unabashedly invested millions of dollars into the recreational and commercial-based development model. In the first three years of his plan, Kentucky approved nearly \$20 million in bonds to build several new lodges, renovate older ones, and build additions off others. The Commonwealth sought to invest money into commercially developing state-owned lands in the hopes that the tourism would pay back generously. In Combs' plans, "the development of the state's parks was seen as just one component of a larger tourism initiative that also included highway development and a vigorous promotional program with the goal of bolstering the private sector tourist trade alongside the state park system."<sup>9</sup> Improvements implemented during this time of massive investment included:

- Swimming pools, docks, and beach areas;
- Boat launches and water skiing facilities;
- Riding stables and associated trails;
- Golf courses;
- Campgrounds with modern amenities, such as restrooms, showers etc.;
- Modern playground equipment;
- New lodges and dining rooms;
- New cottages;
- Remodeling of existing cottages/facilities;
- Interpretive programs following the NPS model;
- Expanded trails;
- Expanded tourism programming<sup>10</sup>

State parks are widely recognized as state property and explicitly created to protect and promote a state's interest in tourism and recreation and the exploration of the natural environment specific to the state. The state's involvement in park hotels and recreation centers is a tangential impact of their ownership of the parks. Additionally, state interests rarely, if ever, extend outside the boundaries of a specific park. Often in fact, the state must be the owner and operator of such a

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<sup>7</sup> Ibid.

<sup>8</sup> Bert T. Combs, "Plans for State Park Development," in *The Public Papers of Governor Bert T. Combs: 1959-1963* (Lexington, Kentucky: The University Press of Kentucky, 2015), 159, 161.

<sup>9</sup> National Register of Historic Places, Kentucky State Parks Multiple Property Submission, Various, Kentucky, National Register #1217480:E34.

<sup>10</sup> Ibid.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

facility, because the appearance of private investment and profit in such a place would appear “unseemly” and raise questions if not handled very carefully and transparently.

### *The State’s Involvement in Private Enterprise and Development*

In most cases of the state’s involvement in the development of state-owned land, there is a significant role played by private entities. In most of these circumstances, the state remains largely in the background, only providing a cursory involvement or allowances for private enterprises to realize their projects. Of such agreements, two stand out: the implementation of Tax Increment Finance (TIF) districts and the utilization of Industrial Revenue Bonds (IRB).

#### *TIF Districts*

The first Tax Increment Financing district was created in California in 1952. With the exceptions of Arizona and Washington, D.C., every state has enabling legislation for TIF districts. A TIF plan allows a local unit of government to obtain an underdeveloped or distressed area for development, and to freeze its tax assessed value as the property is developed by private interests. Any increases in property tax revenues, due to increases in value after the development, can be used to finance improvement projects in the area. Normally, a municipality establishes a development authority and designates a geographic district for the TIF plan.<sup>11</sup> While TIF ordinances are adopted and executed by a local government, state governments are responsible for the creation of TIF districts, as they must authorize the creation of any, and enforce additional conditions on a case-by-case basis.

TIF plans have been regularly implemented on state-owned land, but more commonly simply require the government’s involvement to incentivize developers to provide much needed improvements. In these cases, the risk falls on the developers who are seeking to revitalize the blighted areas and the local municipality and state simply helps facilitate the improvements, often by using the TIF funds to construct infrastructure, rather than placing that burden on the developer.

#### *Industrial Revenue Bonds*

Industrial Revenue Bonds offer a supply of tax-exempt or taxable bond finance for projects involving significant private investment and private activity promoting new and existing businesses, encouraging employment, and expanding the tax base of a community. These bonds are backed by state and local governments; however the profits are distributed to private businesses who are in turn responsible for payment. Again, the state’s involvement is somewhat cursory as most of the risk lies with the developers.

IRBs, previously called Industrial Development Bonds, are indisputably tied to the history of public financing of private business. In most cases, historically, private business financing required relatively minimal effort and occurred on a much smaller scale yet was still utilized to spark economic growth. However, as the size of individual distributions began to grow, the government became concerned with “the negative impact the financing of private business had on the tax-

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<sup>11</sup> Laura M. Bassett, *The Urban Lawyer*, Vol. 41, No. 4 (Fall 2009), pp. 755-786  
Sections 9-end page 16



Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

exempt bond market.”<sup>12</sup> Thus, Congress enacted controls over the allocation of industrial development bonds, which included a small issue exception to protect the issuances of which the original bonds sought to fulfill.

In 1954, the IRS ruled “that bonds issued by or on behalf of a municipality to finance acquisition or construction of municipally owned industrial plants for lease to private enterprises are obligations of a political subdivision” meaning “bonds may be issued to finance projects even though the sole basis for repayment of the bonds is limited to revenues from the projects.”<sup>13</sup> This practice continued, and eventually it became commonplace for payments to be limited to the revenue of private entities. \

As Lynn Kawecki concluded in her work, “An Historical Perspective of Small Issue Bonds,”:

Throughout a period of about seventy years industrial development bonds have assisted underdeveloped communities to attract small business. This had been the original intent of industrial development bonds as they existed prior to the 1950s in private rulings. Congress believed that this type of economic subsidy was worthwhile, so it retained the subsidy at a time when the future of industrial development bonds was threatened. Since the initial legislation providing for small issue bonds first appeared there has been a tension between attempts to expand the subsidy and efforts to retain the subsidy solely for its original purpose of helping economically underdeveloped areas. From 1968 through 1988, small issue bonds were marred with false starts, re-evaluation and regular tinkering. However, after 1988, small issue provisions stabilized.

Thus, IRBs have historically been a way for a private entity to fund development with state support but without the state needing to take on any of the risk. This is a more practical and detached approach to utilizing bonds to fund private development.

## **Direct Investment and Ownership**

### *Development of Capital Plaza Project*

Frankfort’s population almost doubled from 1940 to 1970, from 11,492 to 21,902. Until after the Second World War, the city populated the low-lying land of the Kentucky River valley. During these years of economic and population growth, the City of Frankfort found the topography leading up out of the valley a challenge to expansion. The City investigated ways to foster growth within its geographic and historical boundaries.

The City Commission sought federal help to reutilize land in the old city area. Beginning around 1949, the US Government began funding urban renewal efforts which seized and demolished sizable quantities of land, both public and private, in order to improve infrastructure, modernize cities, and provide contemporary commodities that were deemed necessary for continued growth into the latter half of the twentieth century. In 1958, the Frankfort City Commission entered a

<sup>12</sup> Kawecki, Lynn, “An Historical Perspective of Small Issue Bonds” IRS, Electronic Document, <https://www.irs.gov/pub/irs-tege/part1b02.pdf>, accessed November 2023:9.

<sup>13</sup> Ibid:10

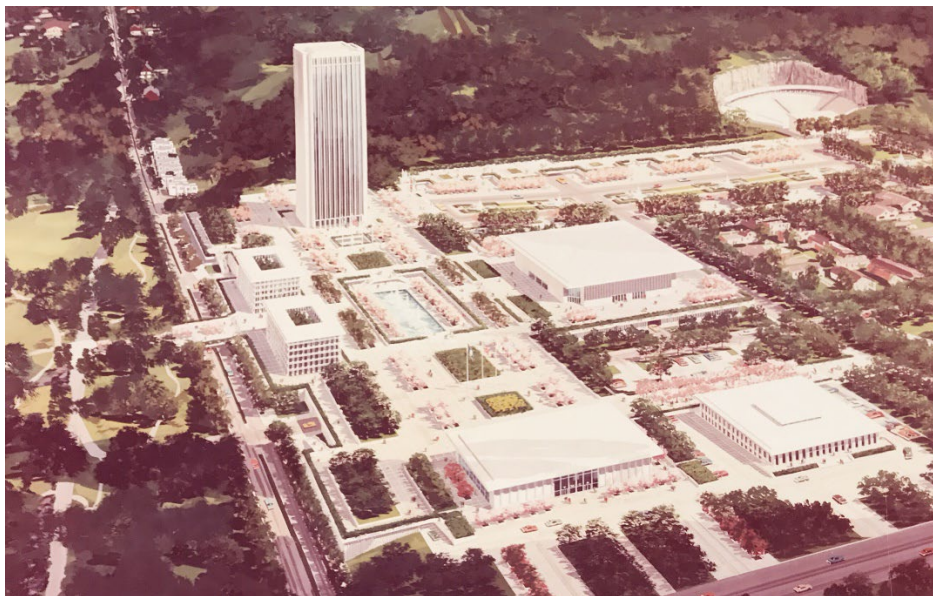
Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

contract with the federal government for urban renewal efforts in the city and they set their sights on Crawfish Bottom.

The modest housing stock in the Craw allowed it to serve as an acceptable neighborhood for those of the least economic means in the early twentieth century. However, the Flood of 1937 affected the entire Ohio River valley, and it devastated the Craw. The neighborhood did not recover substantially, and it began to be perceived as a blighted area of town. The Craw's poor condition, coupled with the negative associations that many other Frankfort residents held with the lower-income, and ethnically diverse neighborhood, led decision makers to target the area for removal under the banner of urban renewal.

Upon approval of the urban renewal plans, by 1965, almost the entirety of the fifty plus acre area, previously known as the Craw, had been cleared. Three years later, construction began on what would become the first of several urban renewal projects in the reimagined North Frankfort development which was being called the Capital Plaza. The original plan (Figure 3) featured much of what would come to fruition in the coming decade and a half, including the Capital Plaza Office Tower, the Convention Center, the YMCA building, and the John C. Watts Federal Building.



*Figure 3. 1967 Original Plan of Capital Plaza*

The urban renewal efforts that led to the construction of the Capital Plaza development resulted in an unparalleled extensive complex that dominated the Frankfort landscape. The construction on the massive complex began in 1968. The first building, the YMCA, was finished in 1969. The massive Capital Plaza Office Tower was opened in 1972. In 1973, the John C. Watts Federal Building was complete, around the same time as the Shoppes and the Convention Center. The hotel was the last aspect of the complex to get constructed, with a soft opening in December 1983 and final completion in early 1984. Although the original plans, likely configured by renowned architect Edward Durrell Stone, featured two hotels or motels in the space now occupied by the

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

Capital Plaza Hotel, a single hotel was deemed to be a necessity to the growing city and the Commonwealth's capital. Other elements of the complex included common space for pedestrians, beautification features, and even the North Frankfort Levee along the banks of the Kentucky River.

This development, coupled with Frankfort's role as the state capital, led to the desire for a hotel building to both work in tandem with the convention center to draw patrons and tourists to the city, but also to serve the state government and visiting citizens, legislators, and other interested parties. When private developers were largely uninterested, the state teamed with an influential businessman and aspiring politician to bring the hotel into being. Moreover, in order to see the project to its completion, the state utilized millions of dollars in direct state funding and nearly \$10 million in state subsidized loans, which were written at lower rate than normal, to further make the project more feasible.

#### *Development of Capital Plaza Hotel*

The financing of the Capital Plaza Hotel was accomplished differently from the other parts of the complex. The earlier buildings of the Plaza occurred with the state remaining somewhat hands-off. With the financing of the Plaza Hotel, the state did more than provide distant financing assurances, assistance through the regulatory process, or guarantees of leases. State government stepped into the development as a full partner.

The state believed that it badly needed a hotel in the Frankfort downtown area, which had been missing for many years. Most state business that required convention facilities was being directed to hotels along the highway, far away from the capital, or to Lexington or Louisville. State Finance Secretary Russell McClure claimed to the *Courier-Journal* in 1978 the state needed a hotel to complement the existing state-owned convention center and plaza complex. He went as far to claim, "I can put it at 65 percent occupancy just by administrative control."<sup>14</sup>

The belief that the state should have a direct hand in the project was not universally held. The House Finance Committee produced a memo at the same time that stated, "If the project is feasible, it should be viable in the private sector without state participation."<sup>15</sup> This tension resulted in a split development plan, where the hotel rooms would be privately financed and operated, the amenities on the first floor, including meeting rooms, a swimming pool, workout facilities, the lobby, and parking, would all be financed directly by the state.

In March of 1978 the *Courier-Journal* declared "State All Set to go into Hotel Business."<sup>16</sup> The senate approved a bill providing \$3.5 million to cover 40% of the project costs. Several years later the state approved an additional \$750,000 in loans for the project and agreed to a below market 8% interest rate to make the project more feasible. Several months later the state approved \$2 million in bonds to cover additional loans on the project. At its completion the hotel used \$3 million in direct state funding and a further \$8.5 million in government subsidized loans, including

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<sup>14</sup> Whitt, Richard, "Frankfort hotel plans proceeding with help from state." In *The Courier-Journal*. March 5, 1978.

<sup>15</sup> Ibid.

<sup>16</sup> "In the Senate: State all set to go into hotel business." In *The Courier-Journal*, March 11, 1978.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

IRBs.<sup>17</sup> Moreover, to make the deal happen, the state issued a lease in 1982, the year construction began, for 99-years to the owner of the building. This act helped solidify the direct involvement by the state in the continued existence and their investment in the hopeful success of the hotel.

Once the idea behind the hotel had been decided, private investment and involvement was needed to see the project through to fruition. From the early days of the hotel's conception, once the original model abandoned the office buildings depicted in Figure 21, Kentucky sought to attract a national hotel company to construct the anticipated hotel. However, after approximately a decade, there were no takers, despite the well-advertised, heavy-handed nature of the state's involvement and investment in seeing this enterprise through. The state had a vested interest in the success of the hotel, but it could not entice the large chain it envisioned needing. At this point, budding politician and future Kentucky Governor, Wallace Wilkinson, stepped in to accept the risk.<sup>18</sup>

Wilkinson, who made a "multi-million-dollar fortune on books, real estate, timber, coal and banks" got into real estate in the late 1970s.<sup>19</sup> He was known for his shrewd business dealings, although he was often caught taking part in questionable actions and butting heads with government agencies. None of this stopped him from making a deal with the Commonwealth of Kentucky in the construction of the Capital Plaza Hotel when no one else was interested. In addition to the \$3 million from the state and the \$8.5 million in subsidized loans, Wilkinson put \$1.15 million of his own money into the building's construction and in the beginning, he "used fancy accounting techniques to cover the hotel's start-up losses with money his textbook company otherwise would have paid in federal and state income taxes."<sup>20</sup> The creative accounting used to get the hotel built was just one of the many tricks employed in this undertaking by individuals, such as Wilkinson, continuing even as he assumed the Governorship.

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<sup>17</sup> Taylor, Livingston, "Frankfort builds up its plans for hotel in the Capital Plaza." In *The Courier-Journal*, September 11, 1982; Taylor, Livingston, "State plans \$162 million bond issue." In *The Courier-Journal*, November 16, 1982.

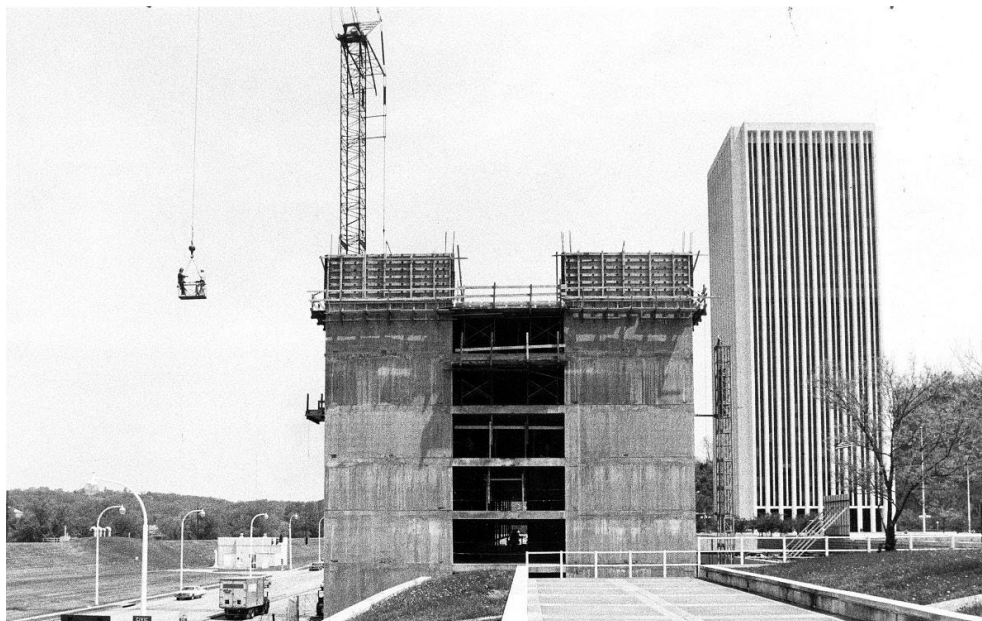
<sup>18</sup> Wagar, Kit, John Winn Miller, and Valarie Honeycutt, "Wilkinson 'works smart' to expand wealth." In the *Lexington Herald-Leader*, October 12, 1987. It should be noted that Wilkinson Street is named for one of downtown Frankfort's original landowners, General James Wilkinson, and not because of the involvement in Wallace Wilkinson in the construction of Capital Plaza Hotel. The latter is simply a coincidence.

<sup>19</sup> Wagar, Kit, John Winn Miller, and Valarie Honeycutt, "Building a million-dollar empire." In the *Lexington Herald-Leader*, October 11, 1987:A1.

<sup>20</sup> Wagar, Kit, John Winn Miller, and Valarie Honeycutt, "Wilkinson 'works smart' to expand wealth." In the *Lexington Herald-Leader*, October 12, 1987:A6

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State



**Figure 4. Construction of the Capital Plaza Hotel, facing northeast (Lexington Herald-Leader, May 14, 1983).<sup>21</sup>**

#### *The Capital Plaza Hotel: 1984 to the Present*

Shortly after the Capital Plaza Hotel opened, propaganda and advertisements proliferated, hailing the hotel “a major attraction in Frankfort and the Bluegrass.”<sup>22</sup> However, in its early years, the hotel failed to live up to the excitement and accomplishment that developers touted. While the hotel did draw conferences and advertised first rate amenities, it was reported that in each of the first 3 years, the hotel was losing an estimated \$1 million.<sup>23</sup> To compound on the issues surrounding the hotel and the questionable practices encompassing its development and those associated with it, when Wilkinson was elected as the Kentucky Governor in 1987, he sold the hotel due to a conflict of interest, and he got the state to approve refinancing the hotel’s bonds at a “greatly reduced rate.”<sup>24</sup> Wilkinson also, somehow, avoided paying taxes on the property during his tenure as owner in the mid-1980s.<sup>25</sup> Furthermore, this sale was eventually called into greater question as the buyer, Kentucky Central Life Insurance Company, asserted that Wilkinson used his role as Governor to sell the hotel at an inflated price.

<sup>21</sup> “Hotel shaping up.” In the *Lexington Herald-Leader*, May 14, 1983:A5.

<sup>22</sup> “Capital Plaza Hotel.” In the *Lexington Herald-Leader*, March 2, 1984.

<sup>23</sup> Wagar, Kit. “Wilkinson got inflated price for hotel in ’87, records suggest.” In the *Lexington Herald-Leader*, October 6, 1995.

<sup>24</sup> *Ibid*:B5.

<sup>25</sup> “Caution! Tax avoidance at work!” In the *Lexington Herald-Leader*, January 11, 1990.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State



*Figure 5. 1990 View of the Capital Plaza Hotel, facing east (Lexington Herald-Leader January 10, 1990).<sup>26</sup>*

In an effort to breathe new life into the hotel, Kentucky Central Life Insurance Company entered into a franchise agreement with Holiday Inn Inc. in 1991. Thus, the Capital Plaza Hotel became a Holiday Inn and officially operated under the new name, the Holiday Inn Capital Plaza.<sup>27</sup> This move sought to “increase the hotel’s market share” by granting it access to the Holiday Inn reservation system, its advertisement group, and its promotions.<sup>28</sup> Aggressive moves like this, while seemingly progressive and innovative, were made to reduce continued losses from the hotel. Kentucky Central continued to experience the same substantial yearly losses as their predecessor, for example, in 1989, the hotel had operating losses of \$1.8 million.<sup>29</sup>

Over the next decade, business did not improve for the Capital Plaza Hotel. Occupancy continued to be an issue as the hotel and convention space failed to live up to the supposed demand that was once so widely espoused. In 2002, thanks to a decision to sell the hotel, in an amendment to the lease, there was a clause added that states that “no property owned or controlled by the state within a mile radius of the Capital Plaza Hotel is permitted to have a hotel on it for 20 years,” a clause

<sup>26</sup> Wagar, Kit. “Wilkinson to pay \$90 in hotel taxes.” In the *Lexington Herald-Leader*, January 10, 1990:1.

<sup>27</sup> *Ibid.*

<sup>28</sup> Daykin, Tom. “Frankfort’s Capital Plaza to become Holiday Inn.” In the *Lexington Herald-Leader*, February 12, 1991:C6

<sup>29</sup> *Ibid.*

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

that was renewed in 2018 to run through the end of 2030.<sup>30</sup> This clause essentially gave the Capital Plaza Hotel a monopoly on the hospitality industry in all of downtown Frankfort, because any parcel of land in the capital big enough for a hotel would likely either be on state-owned land or be controlled by the state. This once again showed the state taking a heavy-handed approach in the affairs of private business by favoring the hotel, an undertaking that the state had a vested interest in.

Capital Plaza Hotel's reception has been mixed since the concept was first hatched in the late 1960s. As early as 1971, at a time when the only two portions of the large-scale, urban renewal project, the Capital Plaza complex had been completed, the YMCA building and the construction of the levee, a survey showed that "demand will not support a hotel or motel."<sup>31</sup> However, just five years later, then-governor Julian Carroll, described the potential hotel plan as "the critical ingredient to maintain the Capital Plaza successfully."<sup>32</sup> This sense of unfettered optimism continued in 1984, after the hotel's opening as the director of the Frankfort Tourist Center was quoted as saying that "the Capital Plaza Hotel is one of the best assets" in Frankfort and that the city is "experiencing a tremendous increase in the amount of interest people have shown in visiting."<sup>33</sup> By 1990, many people in Frankfort were coming to the realization that the Capital Plaza Hotel was not sustainable and that the city's tourism or convention business could not support that large of a facility. A newspaper article written in that year summed up the thoughts surrounding the construction of a hotel and its shortcomings, along with those of the Capital Plaza complex as a whole: "what the complex needed was a hotel, something to bring people to the area, to fill the Civic Center with conventioners...A hotel arrived, conventions did not."<sup>34</sup> The fate of the Capital Plaza Hotel is one that remains uncertain into the twenty-first century with developers in conjunction with the City of Frankfort and the Commonwealth of Kentucky seeking to find a way to make the hotel thrive.

### **Evaluation of the Significance of the Capital Plaza Hotel within the Context of State Direct Investment in Private Enterprise**

The development of the Capital Plaza Hotel is exceptionally significant in regards to the Commonwealth of Kentucky becoming inseparably involved with the private development of the hotel. The use of bonds to fund development, as was seen in the multi-faceted Capital Plaza Hotel project, was not unique and remains a viable option for financing development in underutilized areas. However, such a heavy-handed role from the state as the financier, the owner of the land, and a partner in the building itself, was a unique and self-serving gesture. The state was not only financially invested in the success of the hotel, but it also sought to utilize its presence for state business. The role the state had in the success and financing of a privately-owned and -operated hotel was so great, that when Wallace Wilkinson was elected governor in 1987, he was forced to

<sup>30</sup> Miller, Alfred, "Capital Plaza Hotel owners say 'they're not going away,'" in *Kentucky Today*, August 14, Louisville, Kentucky, 2017; Miller, Alfred, "Frankfort's Capital Plaza Hotel could extend a non-compete deal with the state through 2030," in *Northern Kentucky Tribune*, May 29, Edgewood, Kentucky, 2018.

<sup>31</sup> Taylor, Livingston, "A \$49 million question." In *The Courier-Journal*, March 1, 1971.

<sup>32</sup> "Carroll to get plans for Capital Plaza hotel." In *The Courier-Journal*, April 28, 1976.

<sup>33</sup> "Capital Plaza Hotel." In the *Lexington Herald-Leader*, March 2, 1984:Advertising Supplement 3.

<sup>34</sup> Cheligen, Mark R. "Future of Capital Plaza remains in doubt." In the *Messenger-Inquirer*, May 7, 1990.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

sell the hotel because the attorney general “ruled that it would be a conflict of interest for Wilkinson to own the hotel because the state did so much business there.”<sup>35</sup>

The Capital Plaza Hotel was bred out of a larger plan to boost Frankfort’s economy with the construction of the amenities included within the larger Capital Plaza complex. The hotel was supposed to succeed with the help of the nearby convention center, which was supposed to bring conventions to Frankfort instead of the city losing that business to Kentucky’s larger cities. With its proximity to the state capitol, the hotel was supposed to provide a consistent flow of patrons traveling for state business. While both factors led to some patronage of the hotel, they were not nearly enough to make it successful, as the hotel was regularly losing over \$1 million a year. The hotel was originally supposed to be financed privately, but after years without any private interest, the state got involved and offered to assist in the backing. The initial development of the hotel with state funding was met with pushback and skepticism from many people in Frankfort as well as influential citizens throughout the state and in state government. However, the involvement of politically motivated individuals, who would eventually run the state government, pushed to see the hotel through construction regardless. Scandal and deception followed the hotel through its first decade, but the state continued to provide funding and incentives to private investors and developers to try and save the hotel.

Overall, the Capital Plaza Hotel is the only known development project of its kind. This project involved multiple levels of state involvement, from ownership of the land, funding of the construction, and other incentives and motives around its hopeful success, despite the fact that it was ultimately a private development project. The state utilized its unique abilities to levy reduced tax rates, provide excess bonds and loans, and independently provide the project with a large portion of its eventual business, all in the hopes that the hotel would prove to be a wise investment, a financial success, and an economic boon, all of which it failed to do.

State parks were used in this nomination as an example of the traditional methods of developing state-owned land. What separates state parks and the Capital Plaza Hotel is the place of profits in either business. The underlying goal of state parks is the promotion of tourism and the state’s identity, not profit. The state government subsidizes state parks as a state service, and distributes the parks throughout the state so all Kentuckians can benefit from them. Defining state parks as a state government service relieves them of the pressure to perform profitably from guest income and other fees. By contrast, hotels are typically private developments, whose success is measured purely by their ability to generate a profit for their owners. When the state government and private interests operate with different measures of success, joint ventures can be problematic. With profit standing as the motive for private investment, a hotel which did not operate profitably would be of less interest for a private-public partnership. The fact that the Capital Plaza Hotel has been unprofitable since its construction, which was predicted from its inception and confirmed by use, makes this venture very much different from other state government investments.

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<sup>35</sup> Wagar, Kit. “Wilkinson got inflated price for hotel in ’87, records suggest.” In the *Lexington Herald-Leader*, October 6, 1995:B5.



Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

Ultimately, the Capital Plaza Hotel was supposed to benefit the state government by providing a place to do business, which it did in abundance, and as a place for visitors to reside when staying in the city. This was seen as something that a capital city should have. In addition, at the time it was conceived and ultimately constructed, the Capital Plaza Hotel was a part of a larger, state of the art complex that was intended to make Kentucky look better and provide needed functions to Frankfort. The fact that it has failed to be profitable has shown that the state put its own self-interest ahead of the traditional rationale behind for-profit private developments, and it used its unique powers to make this a reality. By ignoring predictable market analyses that showed that such a development would not work, the state pushed this through, which has resulted in a unfortunate project, and one that has not been duplicated since.

For such a nomination, one that argues significance based on events that are not typically viewed as successful, beneficial, or worthy of commemoration, it is important to acknowledge that significance does not intrinsically mean celebration. Nowhere in the National Park Service's definitions and descriptions of historical significance is it stated that a resource will only be considered significant if it is associated with positive events or actions that have only had beneficial effects. Instead, significance arises from the meaning or value ascribed to a resource based on the criteria for evaluation. As such, resources that have inherently negative stories or resources that depict cautionary tales, but still meet the criteria and retain sufficient integrity can be considered eligible. One of the most noteworthy examples of this is in the listing of the Watergate Hotel. While the Watergate was listed for architectural significance, it also derives its significance under Criterion A for the political significance on the national level. In this case, Watergate was the location of a break-in that eventually shone light on a wide campaign of political spying, sabotage, and scandal by the President's office. This resource, which was also listed before it reached 50 years old, obtains significance not from events that are worthy of celebration, but instead as a place where events that were contrary to the ideals of American politics took place. The Watergate Hotel is a resource that gained national significance; a somewhat parallel assessment is being made for the Capital Plaza Hotel on local level of significance. To have local significance, a resource must have played a noteworthy role in local events or the local community. The Capital Plaza Hotel, and the entirety of the urban renewal Capital Plaza development, whose construction was supposed to transform Frankfort's downtown into a larger metropolis, has mostly failed. Moreover, the Capital Plaza Hotel is a cautionary tale of a situation where the state government pushed a development forward, where no prior private interest lay, and they did so to their own detriment. There is a reason this has not happened in Kentucky since. Such an event has significance as an important tale of how public-private partnerships must be approached soberly.

### **Evaluation of the Significance under Criteria Consideration G as a Building less than 50-years old**

While National Register eligibility is typically limited to properties that are at least 50-years old, if a property has exceptional significance and has not met that age threshold, it can still be considered eligible under Criteria Consideration G. The Capital Plaza Hotel meets the standards required by this Criteria Consideration. In the modern history of Kentucky, such a convoluted and self-serving development between the state government and highly influential and politically

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

driven businessmen has never occurred outside of the Capital Plaza Hotel, and one is unlikely to happen again.

This property is not being evaluated for its significance as a part of the urban renewal efforts in Frankfort, but that portion of its story informs its exceptional significance. Construction of the Capital Plaza Hotel was billed as the completion of a lengthy Urban Renewal effort to revitalize downtown Frankfort. Urban Renewal occupies a relatively recent era in American history, yet it is indisputably considered to be one of the largest factors of how American cities have changed in the last 75 years. This makes the genesis of Capital Plaza Hotel part of a larger project, and a long-awaited component of that project.

However, its Area of Significance is one that lends itself to greater significance within the past fifty years, that of the development of Frankfort and the heavy-handedness and self-serving nature of participants in this particular project.

The Capital Plaza Hotel project stems from an era in Frankfort's history, which occurred in the last 40-60 years, where State Government undertook significant efforts to develop the downtown of the capital city and increase tourism, overnight stays, and entertainment instead of perpetuating the narrative of Frankfort as a waystation. The perception of Frankfort as a stopover arose from the fact that despite being the Commonwealth's capital city, it lost out to larger cities on major attractions, cities such as Louisville and Lexington. Moreover, the fact that Interstate 64 skirted the city entirely, passing by a few miles south of the city's boundary when opened, propagated this idea. The state's legislators may have agreed to this project to raise the perceptions of the importance of their workplace. Local and legislative interests were served in a powerful way by the project, despite the absence of a demonstrated demand. Thus, the development marks the intersection of mutual interests that sought a novel way to grow Frankfort through the construction of the Capital Plaza Hotel, when participants may have lost patience waiting for a private entity to construct a hotel in the Capital Plaza complex. This project is so unusual for Frankfort that it warrants exceptional significance in the history of Frankfort and its development.

### **Evaluation of Integrity between the Significance of the Capital Plaza Hotel and its Current Physical Condition**

This building has been evaluated in terms of its overall relationship to the general integrity standards and its ability to convey the significance outlined above. The task of evaluating whether a building is potentially eligible for NRHP listing means first evaluating its significance according to at least one National Register eligibility criteria, and then, in this case, a criteria consideration, and then evaluating whether there is an integrity between that resource's physical condition and the sense of significance. That will call for ". . . sometimes a subjective judgment, . . . it must always be grounded in an understanding of a property's physical features and how they relate to

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

its significance.”<sup>36</sup> There are seven aspects of integrity as identified by NPS: **Location, Design, Setting, Materials, Workmanship, Feeling, Association.**<sup>37</sup>

The Capital Plaza Hotel is highly intact. The building has had few alterations over the years, with the exception of some interior modifications to keep the hotel, which has remained in operation as such since it was built, up to date in its offerings, compliance with modern codes such as electric systems, accessibility etc., and aesthetics. The exterior, in terms of style and appearance, has not changed over the years and, most importantly, it has maintained its overall form and function. As noted above, all interior alterations have been done in an effort to stay relevant and attractive to the clientele, updates that are necessitated by the type of business the building has housed for forty years. In its current condition, the building possesses strong integrity. The original use, exterior presentation, and interior layout all remain the same as the day it was built, despite modernizations. A building which meets Criterion A, and one that is under fifty years but has achieved significance nonetheless, which possesses integrity of **Location, Design, Setting, Materials, Workmanship, Feeling, and Association** will be eligible for listing in the NRHP.

The property possesses integrity of **location**. This building has not been moved from its original site. The location is a key aspect to its significance, as it is a part of the large-scale state-funded urban renewal Capital Plaza project. In fact, the site on which the Capital Plaza Hotel sits is the last portion of the original Capital Plaza master plan to be decided on and filled. It was meant to provide much needed hospitality needs to downtown Frankfort, including the various state government activities, but also to provide rooming for the expected conferences that would utilize the newly built Convention Center. The Capital Plaza Hotel was to be the last piece to the puzzle for the plan that was supposed to reinvigorate and reimagine Frankfort’s urban landscape.

The building possesses integrity of **design**. The Modern style utilized in the design of this hotel is still prevalent and unique within the local landscape. The Capital Plaza Hotel was built as a part of the Modernist movement. The Modernism styles are characterized by simplicity, first and foremost. Minimalism and the use of new materials and techniques combine to prioritize functionality over embellishment. Similarly, the utilization of clean and sharp lines in conjunction with flat surfaces and clear delineation make these buildings stand out among the earlier high-style architecture. Modern styles, such as International and Brutalism are emblematic of the new way of approaching architecture that rose to prominence in the mid twentieth century. Collectively, these styles encouraged functionality, volume, and balance, as opposed to unnecessary ornamentation, nostalgic stylizing, and presumed symmetry. This is the school of architecture and design that the Capital Plaza Hotel was built in, and it continues to convey this integrity. Its character defining features, such as the sharp lines, resolutely vertical elements, intentional horizontal components, lack of needless ornamentation, and stratification of bays are consistent with the Modernist movement and of the contemporary aesthetic that is still prevalent today.

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<sup>36</sup> United States Department of the Interior. *National Register Bulletin #15: Guidelines for Local Surveys: A Basis for Preservation Planning*. (Washington D.C.: United States Department of the Interior, 2002.)

<sup>37</sup> United States Department of the Interior. *How to Apply the National Register Criteria for Evaluation*. (Washington D.C.: United States Department of the Interior, 1995) 46.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

The building possesses strong integrity of **setting**. Two of the other Capital Plaza buildings are still situated next door, the Watts Federal Building and the YMCA, and the North Frankfort Levee is located across the street, separating developed Frankfort from the Kentucky River. The area surrounding the Plaza, as a whole, has remained relatively unchanged, in function, character, and layout, since the original development in the mid-to-late-twentieth century. The juxtaposition of the urban renewal construction with the older buildings of North Frankfort remains the same as it did when the buildings were constructed. While there is some new construction to the north, namely the Mayo Underwood building, it is consistent with the surrounding use of this area of North Frankfort from the time the hotel was constructed.

The building also retains integrity of **materials**. The Capital Plaza Hotel still maintains the material authenticity of buildings that were built during the urban renewal efforts. While there have been some alterations, namely the replacement of some windows and the application of more resilient exterior cladding treatments, many of the materials used remain. The buildings maintains materials that are consistent with the Modernist movement in Kentucky architecture.

The building retains integrity of **workmanship**. Consistent with the Modernist movement and of the urban renewal efforts in Frankfort, the Capital Plaza Hotel is a large concrete building that is illustrative of the era of construction. This is expressed in the large, unadorned concrete building that retains little to no embellishments. The National Park Service states that workmanship can displayed “in plain finishes” just as in highly ornamental features, and this is the case with the Capital Plaza Hotel. Furthermore, the interior areas that define it as a hotel, with the first level being mostly used as shared space with modern amenities and the upper levels as dwellings, remain almost all just how they were when the building was constructed. The open-concept of the first level and the uniformity of the rooms are all illustrative of the “plain finishes” and expressive example of a high-end hotel from its time of construction.

The Capital Plaza Hotel was constructed for a very specific purpose and each room and the materials in those rooms still reflect this purpose, giving the building a strong integrity of **feeling**. Moreover, the building still serves as a hotel, the purpose for which it was initially constructed, and the layout, features, and grand nature of the interior spaces are indicative of such. Because the building retains integrity of location, materials, and design it can convey that original and specific purpose today, especially given that the purpose has not changed.

The hotel easily conveys its original purpose because it continues to serve that purpose. Additionally, due to the deals that were made in the past few decades, the building is still the only one of its kind in all of downtown Frankfort, allowing it to convey its significance and the implications outlined in the above contexts. This hotel was constructed as a part of a massive urban renewal effort in Frankfort and came into being and survived, due to the ongoing assistance from the state. The effects and results of these deals and the remnant of the urban renewal project as a whole are still readily apparent in the Capital Plaza Hotel. This building is the embodiment of the urban renewal efforts in Frankfort and the result of heavy-handed state involvement, which all gives it integrity of **association**.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

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Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

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**Previous documentation on file (NPS):**

- preliminary determination of individual listing (36 CFR 67) has been requested
- previously listed in the National Register
- previously determined eligible by the National Register

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

designated a National Historic Landmark  
 recorded by Historic American Buildings Survey # \_\_\_\_\_  
 recorded by Historic American Engineering Record # \_\_\_\_\_  
 recorded by Historic American Landscape Survey # \_\_\_\_\_

**Primary location of additional data:**

State Historic Preservation Office  
 Other State agency  
 Federal agency  
 Local government  
 University  
 Other  
Name of repository: \_\_\_\_\_

**Historic Resources Survey Number (if assigned):** FRF 577

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**10. Geographical Data**

**Acreage of Property** 1.74 acres

**Latitude/Longitude Coordinates**

Latitude: 38.202482 Longitude: -84.878435

**Verbal Boundary Description**

Beginning on the southern corner of the intersection of Wilkinson Boulevard and Mero Street, traveling southwest to the eastern corner of Wilkinson Boulevard and Clinton Street, then southeast to the northern corner of the intersection of Clinton Street and the unnamed drive that runs parallel to, and directly adjacent to, the hotel, then northeast to the western corner of the intersection of Mero Street and the unnamed drive, then northwest back to the beginning.

**Boundary Justification**

This boundary was selected to encompass the footprint of the Capital Plaza Hotel, and associated features, both historically and currently.

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**11. Form Prepared By**

name/title: Wes Cunningham, MA  
organization: Pinion Advisors  
street & number: 1131 Logan Street  
city or town: Louisville state: Kentucky zip code: 40204  
e-mail: WCunningham@PinionAdvisors.com  
telephone: 502-807-0575  
date: November 2023

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

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### Photo Log

Name of Property: Capital Plaza Hotel  
City or Vicinity: Frankfort  
County: Franklin County  
State: Kentucky  
Photographer: Wes Cunningham  
Date Photographed: October 30, 2023

- Photo 1 of 18, Capital Plaza Hotel, camera facing southeast.  
Photo 2 of 18, Capital Plaza Hotel, camera facing south.  
Photo 3 of 18, Capital Plaza Hotel, camera facing east.  
Photo 4 of 18, Capital Plaza Hotel, camera facing northeast.  
Photo 5 of 18, Capital Plaza Hotel, camera facing north.  
Photo 6 of 18, Capital Plaza Hotel, camera facing northwest.  
Photo 7 of 18, Capital Plaza Hotel, camera facing southwest.  
Photo 8 of 18, Capital Plaza Hotel entryway, camera facing southeast.  
Photo 9 of 18, Raised common space in the lobby, camera facing southeast.  
Photo 10 of 18, Interior of the indoor pool off the south end of the building, camera facing south.  
Photo 11 of 18, Interior of the hyphen, camera facing north.  
Photo 12 of 18, Main lobby, camera facing northwest.  
Photo 13 of 18, Interior hallway from the hyphen, camera facing southeast.  
Photo 14 of 18, Bar/restaurant, camera facing south.  
Photo 15 of 18, Interior bay of elevators, camera facing east.  
Photo 16 of 18, Interior hallway with rooms on either side, camera facing southwest.  
Photo 17 of 18, Hallway leading to the convention area, camera facing northeast.  
Photo 18 of 18, Inside one of the meeting rooms, camera facing southeast.



Capital Plaza Hotel  
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*Figure 6. Site Plan for the Capital Plaza Hotel.*

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

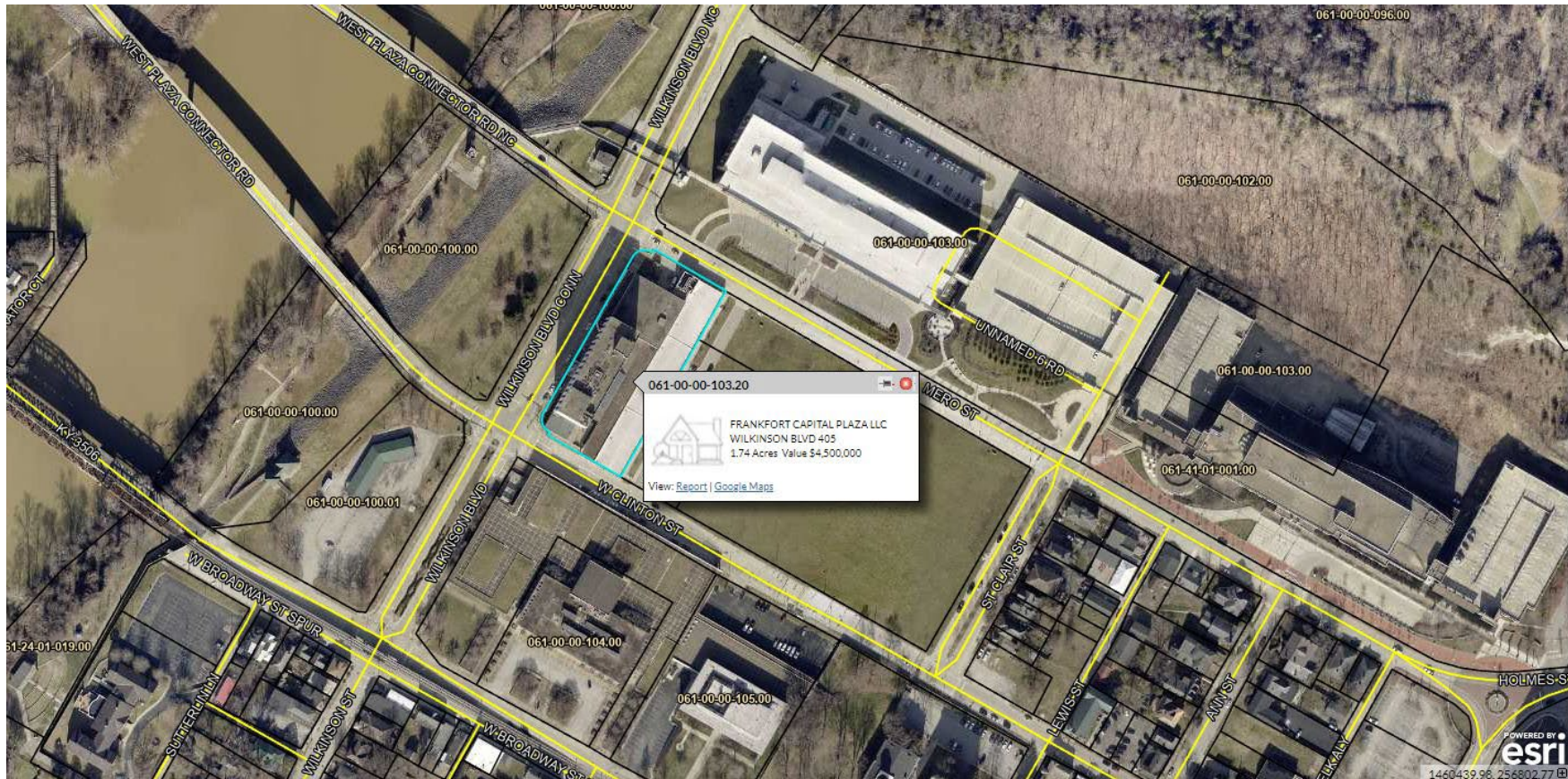


Figure 7. Official Parcel Map from the Franklin County PVA showing the parcel for the Capital Plaza Hotel.

Capital Plaza Hotel  
Name of Property

Franklin County, Kentucky  
County and State

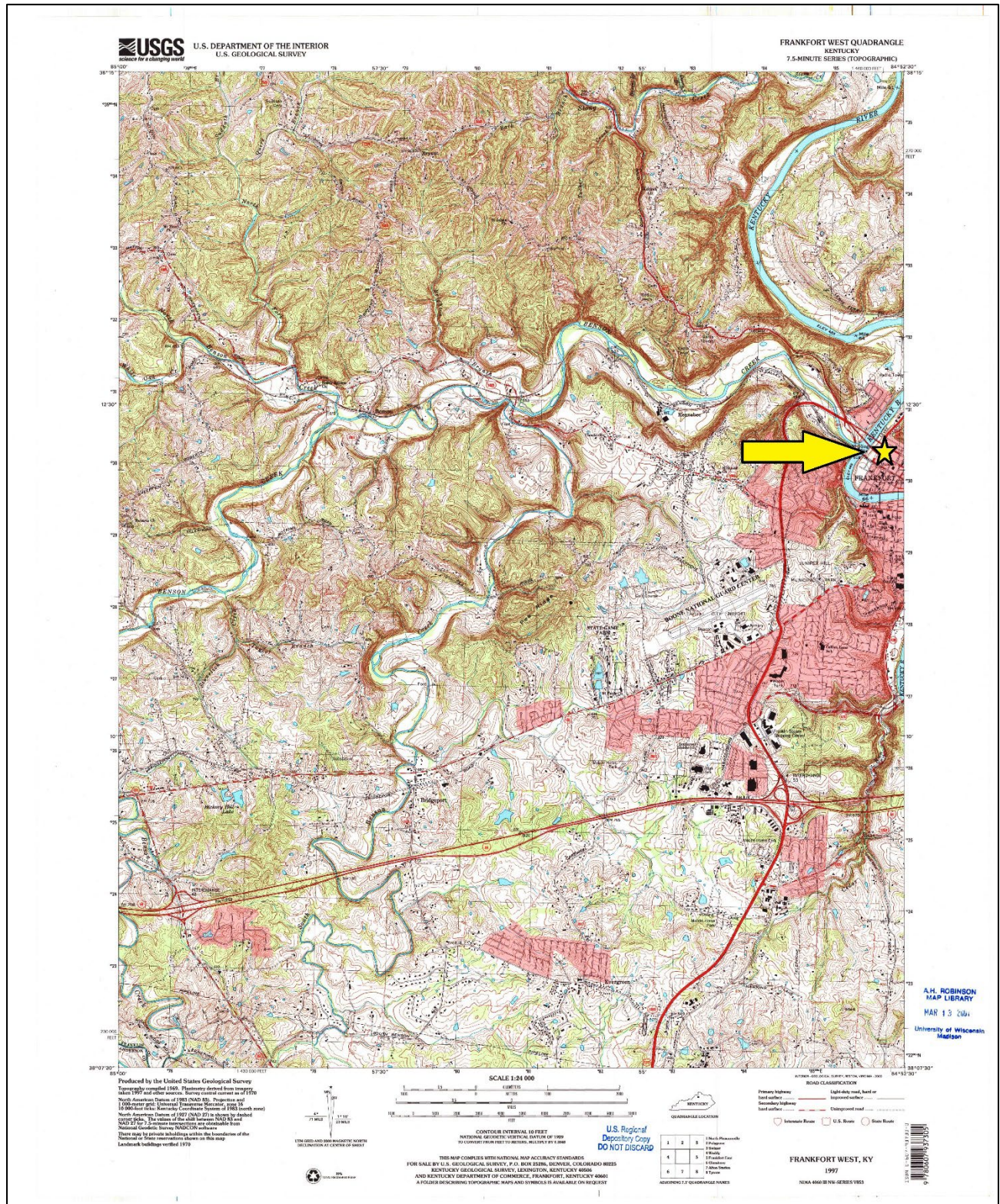


Figure 8. Location of Capital Plaza Hotel on a USGS 7.5-minute Frankfort West, KY Map