CULTURAL RESOURCE MANAGEMENT PLAN

Bent's Old Fort National Historic Site

UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE
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RESOURCE MANAGEMENT PLAN—CULTURAL COMPONENT

BENT'S OLD FORT NATIONAL HISTORIC SITE
COLORADO

United States Department of the Interior
National Park Service
Rocky Mountain Region

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I. INTRODUCTION

I-A. Plan Purpose

A Resources Management Plan: Cultural Component is an action plan, long-range in scope, which identifies, summarizes, and evaluates a park's cultural resources and related needs. As a document that works in concert with the park's General Management Plan and/or Development Concept Plan, the Resources Management Plan: Cultural Component describes for park management the known cultural resources within the park and addresses specific problems, issues, and influences that have bearing on the management of those resources. In addition to proposing solutions to identified problems, the Resources Management Plan: Cultural Component also lists specific research needs and management documents required to effectively manage cultural resources.

Developed and agreed upon by the park management and the Rocky Mountain Regional Office, this Resources Management Plan: Cultural Component proposes interim or final treatment and use of all known cultural resources within the site area. Except in unexpected emergency situations, all actions with regard to those resources are to conform to this plan. The plan is intended to be flexible enough to accommodate modifications and additions which are necessitated by changes in pertinent legislation or policy guidelines, or by changes in our state of knowledge about the resources or about threats to their continued integrity. However, all changes to the plan must be formally agreed upon by both the park management and the Regional Director. These changes must
be reviewed by the Advisory Council on Historic Preservation and the State Historic Preservation Officer. The use of a looseleaf notebook format and pagination by section will facilitate the incorporation of changes without requiring total revision of the plan.

I-B. Qualifications

I-B-1. Coordination with Current Planning

The plan is based on approved planning documents and, as others are completed, management decisions regarding park cultural resources may be changed. Decisions which are not based on approved planning documents or other decision making documents were arrived at through interdisciplinary evaluation and assessment and represent consensus between the Regional Office and the park.

I-B-2. National Register Eligibility

Since NPS-28, Cultural Resources Management Guideline, establishes policy with regard to cultural resources managed by NPS, it is expected that the superintendent and his staff will be familiar with the content of this document and, further, have copies readily available for reference. It should be noted that NPS-28 regards all properties currently included on the List of Classified Structures (LCS) as being potentially eligible for nomination to the National Register of Historic Places, until they have been officially declared ineligible by the appropriate review authorities.

I-C. Prehistory/History

I-C-1. Statement of Significance

The significance of Bent's Old Fort has been adequately illustrated in both the 1963 and 1975 master plans:
Built in 1832-33 as the mountain-plains extension of the St. Louis based American commerce and fur trade in the Southwest, Bent's Old Fort was for 15 years the frontier hub from which American trade and influence radiated south into Mexico, west into the Great Basin country (and beyond to the Pacific), and north to southern Wyoming. Bent's Old Fort, until abandoned in 1849, was the most important commercial port-of-call and depot between Independence, Missouri, and Santa Fe, New Mexico, on the mountain route of the Santa Fe trail. The fort was the major operational base for American traders and trappers in the southern and central plains and mountains of the West.

The Historic Site was also the southwestern outpost of American cultural penetration and influence, and was the principal contact point between the white citizens and government and the Southern Cheyenne, Arapaho, Ute, Northern Apache, Kiowa and Comanche Indians.

American military activity was first extended into the southwest to protect the Santa Fe trade and overland trail travel, and Bent's Old Fort often served as the southwestern pivot of such Army operations. General Stephen W. Kearney's Army of the West launched its penetration into Mexico from Bent's Old Fort in 1846; and from the ranks of the Fort's owners and employees evolved much of the early American leadership in the southwest. Bent's Old Fort was the forward bastion of American expansion into what is now the southwestern one quarter of the continental United States.¹

Located in an area of the fledgling United States long regarded as the Great American Desert and unfit for long-term "civilized" human habitation, Bent's Old Fort became a major center of activity along the Mountain Branch of the Santa Fe Trail. Approximately half-way between Independence, Missouri, and Santa Fe, New Mexico, the fort became the starting point, half-way house, and destination of fur trappers, traders, travelers, Indians, and military personnel in the evolution of the Rocky Mountain West. Together with Fort Union Trading Post and Fort Laramie, Bent's Old Fort attests to the major elements of westward expansion—exploration, colonization, and economic imperialism. "...[Bent's Old Fort's] individual contribution[...] to the continental drive should...provide the overriding point of view for [its] development and interpretation."²
I-C-2. Chronological

No detailed prehistoric archeological study of the Bent's Old Fort area has been completed, however, an archeological survey was conducted by R. K. Nickel in 1976. His study indicated that the area north of the fort did not warrant further study, but south of the river a small site (50T141) did warrant at least controlled testing and possibly complete excavation.

From approximately 10,000 to 5500 B.C. this area is associated with the Paleo-Indian culture. During this time the environment was much wetter than it is today and gave rise to big game hunting--extinct and modern bison and mammoth--and the use of fluted projectile points. Paleo-Indians also participated in a gathering type economy and this forced them to travel a wide geographical area. Social organization was probably at the band level and during the late Paleo-Indian, known as Plano, there is evidence of a well-developed trade system and/or extensive travel indicated by the existence of trade items at the site remains. No Paleo-Indian sites have been identified within the fort area, however, early and middle (Clovis and Folsom respectively) Paleo-Indian type-sites have been located within 100 miles of Bent's Old Fort in northern New Mexico.

Around 5500 to 3300 B.C. an Altithermal drought period existed in this region and a new period of aboriginal existence came into being. This Early Archaic period, as it was known, may have involved a general abandonment of much of the Great Plains followed by a movement into the mountains where precipitation would have been more dependable. This application of this theory to the area in question is unknown, however, lifeways definitely did change. The
Pleistocene bison had been replaced by modern bison; gathering became more important than hunting; and manos, mortars, and other grinding tools appeared.

The Middle and Late Archaic periods (3000 B.C.-A.D. 250) followed cessation of the drought and a reoccupation of the plains. Projectile points remained the same stemmed or corner-notched dart points. The economy was indicated by an increased dependence on plants for food and small game hunting.

About this time a third period of aboriginal occupation of the Great Plains appeared. This was the Plains Woodland (A.D. 250-1000) and pottery, the bow, and possibly maize horticulture made their appearance. Pottery and horticulture were introduced for the north and east into a culture already influenced by traits from the south and west. During this Woodland Period architecture included round stone enclosures—low, horizontally-placed dry-laid, slab foundations with probably a perishable structure on top. Most of these were small farmsteads occupied by family units. Small projectile points indicate use of the bow.

Around A.D. 1000-1300 the influence of tribes in the panhandles of Texas and Oklahoma led to a new prehistoric differentiation known as the Panhandle Aspect. Heavier-than-average rainfall during this period led to a heavy reliance on maize and beans. There was also a return to large game hunting and increased use of the bow. Greater conflict and communication is indicated by defensive works and locations and by trade ceramics from the Rio Grande Pueblos.
During the years A.D. 1300-1500 a large drought prevented agriculture and brought about abandonment of the area. The few people remaining continued as much of the Panhandle Aspect culture as possible. This period ended with the arrival of the Spanish.

The Protohistoric Period (A.D. 1550-1750) heralded the arrival of the first white men in the region and ended with regular contact with the Spanish colonies of the Southwest and the beginning of the Historic Period. The Plains Apache began to occupy the South and Central Plains. This was the "...termination of a great migration of Athabascan-speaking peoples from what is now western Canada into the plains and Southwest." Small, seasonal horticultural villages grew corn, beans, and pumpkins and hunting involved both large and small game.

During the Protohistoric Period many Spanish and other explorers traveled through the area now occupied by the reconstruction of Bent's Old Fort. In 1593 Francisco de Bonilla and Antonio Gutierrez de Humana traveled down the Arkansas on an unauthorized expedition to New Mexico. This was the ill-fated expedition that gave the Purgatoire River its name. In 1601 Juan de Onate, looking for the South Sea, probably passed along the same route as the Humana expedition. In 1706 the Ulibarri expedition began at present-day Pueblo and proceeded east along the Arkansas, past the later-day site of Bent's Old Fort, and into western Kansas. In 1719 the governor of New Mexico, Antonio de Valverde, worried about Ute and Comanche attacks on the Apaches, led an expedition against them. The party reached the Arkansas River east of La Junta. The expedition was not successful as recurring Comanche pressure finally led to the abandonment of this area by the Apache in the late 1720’s. The information that Valverde brought back to Mexico City concerning French
expansion into northern Spanish territory resulted in the Pedro de Villasur reconnaissance expedition of 1720. This French threat was not idle as three French fur traders may have passed through the area in 1750. Very little attempt was made by Spain to colonize this area as they viewed it as a place where Christianized, loyal native tribes might be settled to act as a buffer against the French.

The fear of France was erased in 1762 when France ceded her territory west of the Mississippi River to Spain. This territory was reacquired by France in 1800 and subsequently sold in 1803 to the United States. In 1806 the U.S. sent out an expedition under Zebulon Montgomery Pike who traveled down the south side of the Arkansas. His diary, published in 1810, helped to create the negative view of the plains as unfit for human habitation which would stigmatize it for several decades to come. During his expedition, Pike noted the existence of Pawnee Indians in the area.

In 1819 a military expedition under Major Stephen H. Long set out to explore the sources of the Platte, Red, and Arkansas Rivers. Near present-day Rocky Ford the group split, with Captain John Bell's group continuing east along the Arkansas past the spot where Bent's Old Fort was later built. They were the first to document the existence of Arapahoe and Cheyenne along the Arkansas.

It is from the Long expedition that the plains gained the designation "Great American Desert" which was the name used by Dr. Edwin Jones, official chronicler of the Long expedition. This appellation was reinforced by Long on his map. A fur hunting party in 1821 led by Hugh Glenn and Jacob Fowler followed the Arkansas from Ft. Smith to present-day Pueblo. They saw a large
gathering of Indians near modern-day La Junta which they identified as Comanches, Arapahoes, Kiowa Apache, Cheyennes, and Snake.

It was into this Great American Desert, little explored and much misunderstood, that the Bent brothers would come to create a commercial empire among the Indians, traders, trappers, and travelers of the Plains. The historical saga of the structure known as Bent's Old Fort encompasses only two decades, but those two decades are among the most important in the history of westward expansion.

By the late 1820s and early 1830s the Rocky Mountain fur trapping empire had fallen victim to the large monopolies and the small companies and independent trappers were having a hard time surviving economically. Bitter rivalries among the companies and problems with Indians made it an even riskier business than usual. It was about this time that two seasoned trappers from the Upper Missouri fur trade, Ceran St. Vrain and Charles Bent, formed a partnership. Their partnership did not involve fur trapping, at least not directly. Instead, it involved the development of a major commercial empire on the Great Plains.

The partnership was established about 1830 and, with the addition of Charles' brother William as a partner, it was formalized in 1833 to Bent, St. Vrain & Co. A stockade was built near present day Pueblo, possibly at the mouth of Turkey Creek, to facilitate trade with the Indians. Charles was responsible for arranging credit in St. Louis and purchasing and forwarding goods to New Mexico. This latter responsibility was taken over by Charles after he established himself in Taos.
In 1825 Congress had authorized a survey of the Santa Fe trail and, when the survey reached completion in 1826, national interest in the route and the trade it would enhance became widespread. It was to the commercial opportunities of this trail that the partners turned. It was at the suggestion of one of the Indians who traded at the stockade that the location be moved. Yellow Wolf, a Cheyenne chief, suggested a new site close to both the bison country and the hunting grounds of several southern plains tribes. Charles Bent had already concluded that they needed a massive fort similar to those along the Missouri River and the brothers took Yellow Wolf's suggestion seriously. A site was chosen about 32 miles west of where Yellow Wolf felt it should be, probably to make its location convenient to the fur trappers as well. The site was on the Arkansas River about 12 miles west of the mouth of the Purgatoire River. This placed the new fort in the advantageous position of being directly on the Mountain Branch of the Santa Fe Trail which facilitated the movement of the trading caravans. Although many felt the fort should have been built farther east at the Big Timbers (Yellow Wolf's suggested site), the advantages of the site chosen were summarized in 1853 by Lt. E. G. Beckwith:

"Here, beyond all question, would be one of the most favorable points for a military post which is anywhere presented on the Plains. There is abundance of pasturage, fuel, and building material in the neighborhood...It is of easy access from its central position, from the east, from Santa Fe, from Taos through the Sangre de Cristo Pass, and from Fort Laramie. It is on an immigrant road from southern Missouri and Arkansas...and it is in the heart of the Indian country...." 4

Although there is some debate as to the actual date of construction, 1833 is the most generally accepted date for the Fort's completion. William supervised both the construction and the maintenance of the Fort. Except for the addition of some second-story rooms in later years, the plan of the fort had been thoroughly worked out before construction began. During the construction, the
owners lived in teepees. The main part of the fort itself, with the plaza and surrounding rooms, formed only one part of the structure. The inner corral, the main corral, and the wagon room completed the fort.

The fort is composed of a series of rooms resembling casements, and forming a hollow square, the entrance on the east side. A round tower on the left, as you enter, and another diagonally opposite, constitute the flanking arrangements. The outer walls, which are nearly two feet in thickness, intersect in the axes of the others, thus permitting their faces to be completely enfiladed; the outside walls of the enceinte and towers, pierced with loopholes, are continued four feet above the flat roofs which service for the banquette, which being composed of clay cannot be fired by inflammable substances that might be cast upon it; the whole is built of "adobes," sunburnt brick, formed of clay and cut straw, in size about four times as large as our common bricks. The roofs are sustained by poles. On the west side is the cattle yard, which is surrounded by a wall so high as effectually to shelter them. The coping of the wall is planted with cacti, which bear red and white flowers. From a distance the fort appeared to many as an ancient castle floating on the plains. Most rooms in the fort contained dirt floors which had to be sprinkled several times a day to keep down the dust. Besides the living quarters for William Bent and his family and a room for Ceran St. Vrain to use on his infrequent visits to the fort, there were storage rooms, trade rooms, a meeting or council room, kitchen, dining room, boarding rooms, and workshops for those trades necessary to the maintenance of the fort and its occupants: carpenter, barber, and blacksmith. Both round towers, or bastions, were supplied with small cannon for defensive purposes. Formally named Fort William, to the trappers who traded there it was known simply as Bent's Fort. The adjective "old" was added later to differentiate it from the "new" fort William Bent would eventually build farther east.

From his plains castle William Bent oversaw the Indians bringing in their bison robes and pelts which they traded for beads, cloth, and ammunition from St. Louis and horses, blankets, and silver from New Mexico. Bent's Old Fort contained all the ingredients necessary to be a successful trading fort. It was
located on an active trail providing potential customers, a source of supply, and a future market. It was close to the hunting grounds of the Cheyenne and Arapahoe and their enemies, the Comanche. There was adequate water and forage for the animals and the structure itself was large enough to house both people and supplies and protect them as well.\footnote{\textit{}}

The Indians were not only potential customers to William Bent, but eventually his friends and family as well. To further cement his relations with the Cheyenne, William married Owl Woman, a daughter of Yellow Wolf, in 1835 and, upon her death, he married her sister, Yellow Woman, sometime between 1845 and 1848. William encouraged peace among the Indians for personal and practical reasons: Warfare hurt business. Bent's Old Fort played both a formal and informal role in maintaining the peace in its part of the Great Plains. In 1835 troops under Colonel Henry Dodge met near Bent's Old Fort with chiefs of several tribes to discuss depredations that had taken place on the Santa Fe Trail. Three miles below the fort a great peace council took place in 1840. William Bent not only helped arrange it but profited by the brisk trading that took place before and during it. Major tribes such as the Cheyenne and Comanche met and the peace concluded was never broken.

Between 1842 and 1848 John Charles Fremont led four expeditions into the West. On the third of these expeditions he traveled up the Arkansas to Bent's Old Fort. In 1846 Bent's Old Fort was chosen as headquarters for the Upper Platte and Arkansas Indian Agency with William Bent as agent. Although he did not want the position, he remained responsible to it and kept the southern plains Indians neutral during the march of the Army of the West during the Mexican War. William Bent was very aware of what white contact was doing to the
Indian culture. As both trader and Indian agent he tried to control the availability of alcohol to the Indian population and was most concerned that the destruction of the buffalo, and with it the Indians' lifestyle, would eventually prove true. The Bent's relations with the Spanish, however, were much less harmonious.

As early as 1840 Governor Manuel Armijo of New Mexico informed the Mexican government that the fort was a source of subversion. As tensions between the United States and Mexico grew over the Texas War for Independence and its eventual annexation by the U.S. in 1845, Governor Armijo became even more adament in his denunciations of the fort and of Charles Bent's activities in New Mexico. Governor Armijo's fears were justified, for in 1845 the fort was designated as the advance base for the American invasion of New Mexico and by 1846 General Stephen Watts Kearny had arrived with 1,650 Dragoons. The War Department had never taken William Bent's suggestion seriously that a military post was needed in the vicinity so now they used Bent's Fort as the substitute for the one they had failed to build. The fort rendered medical assistance during the Mexican War to wounded soldiers and it was used as a government supply depot until 1847 when the quartermaster left. Although trade was disrupted by the presence of the military, the army never paid for the supplies that Bent provided nor for the storage space utilized by the quartermaster. The lands surrounding the fort were overgrazed by the military animals to the extent that the Fort animals had difficulty foraging. The practical problems of territorial expansion became evident as "having served as a base for territorial expansion, Bent's Fort was beginning to wither as a direct result of it."
While William was trying to diplomatically handle the unwelcome presence of the military, his brother was bound up in the problems of the American take-over of New Mexico. Having been rewarded in 1846 by being appointed first American governor of New Mexico, Charles was never able to completely carry out his plans for a peaceful establishment of American rule. He was killed in the New Mexico uprising in Taos in 1847 just a few months after assuming the governorship. The only time the government ever rewarded the Bents for their role in the territorial expansion of the U.S., resulted in the death of one of them. In the meantime Ceran St. Vrain, tired of his partnership in the trading enterprise, began negotiations for the sale of the fort to the army. Nothing came of it and, in 1848, Ceran sold his share to William.

Saddened by the untimely death of his brother, frustrated by the actions of the U.S. government, concerned about the cholera epidemic in the vicinity, William Bent abandoned his fort in 1849 and moved his family eastward nearer the Big Timbers where he constructed a fort out of stone which became known as Bent's New Fort. Rumors at the time indicated that Bent blew up a portion of his old fort with the powder stored within it. Perhaps he did not intend for the army to commandeer what they would not buy. Others blamed the smoldering fort on an Indian attack. Possibly the smoke simply came from barrels of tar Bent might have lit to fumigate the fort against the cholera.

Although the story of the Bent family stops here in direct connection with the fort, the story of the fort itself does not. Whatever damage Bent or others did or did not do to the fort, it was not extensive. Even though in 1850 the U.S. government officially discontinued the Bent's Fort branch of the Santa Fe Trail, preferring to use the Cimmaron Cut-off instead, the fort continued to be
used by travelers as an overnight camping spot. Its thick walls gave them a sense of security they did not feel elsewhere. In 1855 it was rehabilitated sufficiently to open as a trading post operated by J. W. Atwood and John H. Tippetts, formerly of a downriver settlement known as St. Charles. Having tired of the Indian problems in using the Cimmaron Cut-off, the U.S. postmaster general decided to utilize the road Kearny had traveled in 1846 which crossed the Arkansas a little west of Bent's Old Fort. Officially known as the "military road," in 1861 Bent's Fort became one of several stage stations operated by the Missouri Stage Company. Its first manager was Colonel Jared L. Sanderson. Sanderson has the distinction of being the only person or agency to actually ask William Bent's permission to use his fort. In 1863 Lewis Barnum was appointed the first postmaster and between then and 1866 two others held the post. Finally, in 1867, cattlemen Daniel W. Holbrook and Philip Lander bought the fort from William Bent for their range headquarters. The land on which it set, however, still belonged to the Bent family and in 1870 Julia Bent, William's youngest child by Yellow Woman, received legal title to it. She moved in during 1872 with the post office and traveler's accommodations still in use and other men's cattle grazing on her land. In April, 1872, Julia sold her section to John W. Prowers who was establishing a large cattle ranch along the river. He continued to use it for grazing land with the fort making an excellent corral. In December, 1873, Walter H. Brown, the last postmaster, closed the United States Post Office and this may have been the end of the fort's role as a stage station as well. As the cattle range began to be broken up into smaller holdings, so did the fort begin to break up. Local ranchers took parts of it to use in their buildings until the fort became a mass of weatherbeaten and formless low mounds on the plain.
A. E. Reynolds, a Colorado mining magnate, purchased 300 acres of land including the Bent's Fort site sometime before 1900. In 1912 the Daughters of the American Revolution approached Reynolds concerning the placement of a stone marker near the remains of the fort to memorialize its contribution to American History. Reynolds not only agreed with their intentions, but paid for the gray granite marker as well. In 1920 Reynolds' daughter gave legal title to the Otero County Chapter of the DAR for one dollar, although the deed was not recorded until 1926 and DAR ownership is considered to have begun at this time.

In 1921 the Great Pueblo Flood had occurred. This 100 year flood leveled what wall sections remained. As early as the year of the flood, the La Junta Chapter of the DAR had visions of an archway placed at the entrance road. It was not until 1930 that the arch was actually dedicated at a cost of $391.32. The cobblestone arch is still in existence today, although the entrance road itself has been re-routed. The DAR maintained the site and were able to prevent any further deterioration; but, a lack of funds prevented them from doing any ambitious restoration or preservation.

The State of Colorado received title to the site in 1954, again for one dollar, in the hopes the State Historical Society could benefit from ownership of a frontier heritage site. Again, a lack of funds prevented any major preservation activities, however, an archeological dig was authorized and in 1954 it was conducted under the supervision of Herbert W. Dick of Trinidad State Junior College. In 1957 the fort walls were outlined with new adobe brick. Two years later Senate Bill #1833 authorized the establishment of Bent's Old Fort as a National Historic Site. The National Park Service Advisory Board, meeting in April of 1959, identified the site as having "exceptional value," and, when approached concerning federal ownership, Acting
Director Scoyen recommended that no objections be given to this proposal. On June 3, 1960, President Dwight D. Eisenhower signed into law the bill "Authorizing the establishment of a national historic site at Bent's Old Fort near La Junta, Colorado." The original site of 178 acres was increased by another 622 in 1978.

Between 1963 and 1968 the site was excavated under the direction of historian Dwight E. Stinson, Jr. and archeologist Jackson W. Moore, Jr. This excavation uncovered evidence of diet, trade items, ceramics, cartridges and other artifacts giving the archeologists a reasonable picture of everyday life at the fort. Two prehistoric burials were excavated in Room S7 in the southwest section of the fort. (This room is the carpenter shop in the reconstruction). These were American Indian females between 20 and 40 years of age. Both were:

...tightly flexed inhumations unaccompanied by grave offerings. Burial 1 was oriented with head to the north, face down, arms akimbo, and legs folded behind. This burial had every appearance of haste and of minimal concern. Burial 2...was a "normal" appearing flexed burial in the tradition of the aboriginal Southeast. This burial was face up, arms folded across the chest, and knees drawn up tightly. Burial 2 had been disturbed by a row of Cattle Period posts.

A proposal to rebuild the fort was made in 1961, and funds were finally made available in 1972 due to the efforts of several Colorado congressmen. Continued efforts finally garnered the full necessary amount by 1974 and reconstruction began with completion during the Bicentennial year.

Rising from the plains much the same way it did originally, the re-creation of the fort enables many more people than otherwise to visualize and, in a limited way, experience life the way it would have been on the Santa Fe Trail.
I-D. Theme Representation

The most current listing of historical themes represented by units of the National Park System, entitled "History and Prehistory in the National Park System and the National Historic Landmarks Program" (National Park Service, History Division, Washington, D.C., 1982), lists Bent's Old Fort National Historic Site as being highly important to the following interpretive themes and facets to themes:

I. The Original Inhabitants
   C. Indian Meets European
      2. Changes in Native Life Due to Contact
         a. Changes in Social and Political Organization

IV. Major American Wars
   C. The Mexican War
      3. Military Events, 1846-1848

VI. Westward Expansion, 1763-1898
   B. The Fur Trade
      4. Rocky Mountain Rendezvous Era, 1824-1839
      5. Southwest Fur Trade
   D. Western Trails and Travelers
      5. Santa Fe Trail

I-D-1. The Original Inhabitants

By the time the first Spanish conquistadors arrived in this area about 1593, the Plains Apache had already begun to occupy the South and Central Plains.
Over the next 200 years more Indians migrated into this area so that American-based fur trapping parties in the early 1800's identified Comanches, Arapahoes, Kiowa Apache, Cheyennes, and Snake. During the years the fort was in existence, Comanche often camped on the south bank of the Arkansas River across from the fort while the Cheyenne often camped in the vicinity of the fort itself and other tribes migrated in and out of the area as their nomadic wanderings took them. William Bent was often concerned about the influence of the white man on the Indian and was one of the few traders who prohibited the use of alcohol in his dealings with the Indians. Married twice to Indian women, William Bent was very aware of the growing dependence of the Indian on the white man and the destruction of the nomadic Plains Indian lifestyle with the encroachment of the whites and the destruction or altering of the subsistence base of the Indians. Caught between their own survival and maintenance of their traditional lifestyles and the "Manifest Destiny" of the whites, the Indians vacillated between warfare and reconciliation. It was William Bent's duty as an Indian agent and desire as a friend and relative of the Cheyenne to maintain this uneasy balance for as long as possible. Today Bent's Old Fort maintains the atmosphere of a trading post by display of trading rooms; the stocking of trade items, some for show and some for sale to tourists; and the use of costumed interpreters representing both Indians and traders.

I-D-2. Major American Wars

In 1845 with the outbreak of war between the United States and Mexico, Bent's Old Fort was designated as an advance base for the American invasion of New Mexico. The failure of the U. S. government to build a military fort in this area forced the government to substitute Bent's Old Fort for the one they
should have built. During the war the fort served not only as an advance base providing room and board to soldiers, but as a supply depot and hospital for the sick. In the fort today some storage and boarding rooms for barracks have been set aside to demonstrate the use of the fort by the military.

I-D-3. **Westward Expansion**

In the last years of the Rocky Mountain fur trade Bent's Old Fort provided not only a market for furs, but a supply base and R and R center for the trappers as well. Although a better site for the fort probably would have been at Big Timbers, 32 miles to the east, the Bent brothers chose the present site probably to facilitate trade with the fur trappers coming out of the Rockies to the west. As the Southwest fur trade began to supplant the Rocky Mountain trade, the fort became a pivotal point in a three way trade: Robes and pelts were brought to the fort to be traded for beads, cloth, and ammunition from St. Louis and horses, blankets, and silver from New Mexico. The trading rooms, fur press, trappers rooms, racetrack, and costumed interpreters indicate this aspect of fort life--business and the relaxation after the business is finished.

With the survey of the Santa Fe Trail in 1825-1826 an influx of traders and businessmen began moving through this area. Bent's Old Fort became a refuge from Indians and the elements for weary travelers as well as supply base for the rest of their journey. Exhausted and undernourished animals could graze in the areas adjacent to the fort or be traded for better stock recycled from previous travelers. The fort became the major civilized point between Independence and Santa Fe.
ENDNOTES


8 Ibid., pp. 38-39.
II. MANAGEMENT POLICIES

II-A. Legislation, Regulations, and National Park Service Guidelines

II-A-1. Pertinent Legislation and Regulations

The cultural resources of Bent's Old Fort National Historic Site shall be managed in conformity with the following applicable legislation, implementing regulations, executive orders, policy guidelines, and approved planning/management documents.

a. Antiquities Act (1906)

b. Uniform Rules and Regulations for carrying out the provisions of the Antiquities Act (1906)

c. Historic Sites Act (1935)


e. National Environmental Policy Act (1969)

f. Executive Order 11593 (1971)


h. Archeological Resources Protection Act (1979)


e. NPS-12, NEPA Compliance Guidelines. September 1982.

II-A-3. Approved Park Planning Documents


f. Fort Maintenance History and Guide. 1982. (Ongoing)


h. Interpretive Prospectus. 1975.


II-B. Cultural Compliance Statement

II-B-1. Archeological Compliance

As stipulated in NPS-28 and in furtherance of Executive Order 11593, any project that has the potential to impact archeological resources must be preceded by a survey of the project area, conducted by a professional archeologist, and an evaluation of all resources located for the National Register of Historic Places. The Regional Archeologist coordinates this work in response to the line item, lump sum, and other programs coordinated through the Regional Office. The park must advise the Regional Archeologist of all day labor ground disturbing activities so together they can ascertain the need for archeological compliance work and insure its implementation in a timely manner.
II-B-2. Programmatic Memorandum of Agreement and Assessment of Effect Form

Section 106 compliance is afforded by the Programmatic Memorandum of Agreement (PMOA), negotiated between the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers (SHPO). The PMOA provides that when this Resources Management Plan: Cultural Component is approved, implementing actions affecting historic properties and archeological resources as defined by NPS-28, will normally not be reviewed by the Advisory Council on Historic Preservation and will be certified as meeting NPS-28 standards by the Regional Historian, Archeologist, Historical Architect, and Curator with final approval given by the Regional Director. For these projects, the superintendent must complete the Assessment of Effect form (see Appendix) and submit it to the Regional Historic Preservation Team (RHPT) at least 30 days before the inception of a project. The SHPO usually is provided a 15-day review period.

The Programmatic Memorandum of Agreement also allows the RHPT to evaluate and certify "energy management" or "preservation maintenance" projects affecting any historic property or archeological structure in the Rocky Mountain Region. The Superintendent should first seek guidance from the Regional Office as to whether a project will qualify as energy management or preservation maintenance (i.e., like kind replacement) and then submit an Assessment of Effect form. This form should be submitted at least 15 days prior to the inception of a project. The SHPO is not usually included in this review process.

II-B-3. Section 106 Compliance Procedures

For actions not covered by this plan there is an alternative way to achieve Section 106 Compliance. When a Superintendent anticipates a project that will
If a work could potentially affect an LCS property or archeological site, he/she should immediately notify the RHPT, providing it with the information: 1) a complete description of the project; 2) the impact(s) of the project upon the resource; and 3) appropriate supporting documentation—photographs, drawings, plans. The RHPT will review the documentation and either concur or return it to the Superintendent, with an explanation as to why the project cannot be accepted or must be modified to protect the resource. If the project is accepted and the level of effect is determined, it will be submitted in a suitable format to the SHPO for his/her review and concurrence. "No effect" actions are reviewed only by the SHPO. "No adverse effect" actions require review by the SHPO and the Advisory Council on Historic Preservation (ACHP). "Adverse effect" actions require consultation with the SHPO and the ACHP to develop a "Memorandum of Agreement" that sets the appropriate level of mitigation for the adverse effect. At least 120 days should be allowed for completion of the review process.

Although the fort is a non-contributing structure, any work done must be compatible with the cultural qualities for which the rest of the site is being nominated to the National Register of Historic Places. Thus, all projects need clearance from the Regional Office and must be submitted on the Assessment of Effect form. This applies to all non-contributing structures in the park.

II-B-4. Report of Survey (DI-103)

The removal or demolition of any historic property, unless officially declared ineligible for nomination to the National Register, must be preceded by appropriate compliance procedures. Review by both the State Historic Preservation Officer and the Advisory Council on Historic Preservation is required. Preparation of a "Determination of Eligibility" for nomination to
the National Register may be necessary if not previously initiated. Requests to remove or demolish historic properties must be accompanied by the following documentation: 1) rationale for this decision; 2) pertinent data about the structure or site, including but not limited to, date of construction, date(s) of significant modifications, and significant persons or events associated with the property; 3) 35mm, black and white photographs showing all elevations and significant architectural details. Since removal or demolition is an "adverse effect," additional documentation and photographs and/or measured drawings may be required before compliance is final. The Superintendent should submit requests at least 120 days before the intended removal or demolition.

II-B-5. National Register of Historic Places Nominations

Bent's Old Fort National Historic Site was placed on the National Register of Historic Places in 1966 in response to the National Historic Preservation Act (1966; amended 1980). At that time the entire site, including the reconstructed fort, cemetary, entry arch, DAR marker, the visitor orientation building, and various maintenance buildings, were listed. Documentation on this site is presently in progress and, when completed, will list only the cemetary, the racetrack, and the site of the fort itself. All other structures, including the reconstructed fort, will be considered non-contributing.

National Register Nominations are prepared by the RHPT and/or qualified park personnel. The completed form is submited to the park, if not the originator, for review. Subsequently, it is reviewed by the Cultural Resources Management
(CRM) Office, WASO, then submitted to the SHPO for review and signature. The nomination is submitted to the CRM office for signature and submittal to the Chief of Registration of the National Register Office for inclusion.

Determinations of Eligibility usually follow a 10-day process, which usually require a longer period of time to complete, including review by the SHPO, the Washington CRM office, and the National Register assuming concurrence by the National Park Service, the SHPO, and the Chief of Registration. The regular nomination process may require up to 160 days to complete. Properties lacking significance may be determined ineligible by agreement between the NPS and the SHPO. Properties of questionable significance, where the NPS and the SHPO disagree, are determined eligible or ineligible by the Chief of Registration for the National Register.

II-C. Park Historic Structures Statement

II-C-1. LCS Survey Documentation

The LCS is an inventory of all above-grade historic and prehistoric structures in which the National Park Service owns or will acquire any legal interest, that merits preservation for their archeological, historical, architectural, or engineering values. The LCS is maintained in the Washington Office; it serves to assist park managers in planning and programming appropriate treatment and in recording decisions regarding listed structures. The full scope and provisions of the LCS are discussed in NPS-28, Chapter 3.
A survey of historic structures at Bent's Old Fort National Historic Site was conducted in 1976, and the LCS eligible structures were listed in 1976 and 1977. At that time the total number of historic structures at Bent's Old Fort National Historic Site stood at 3. Since then it has been determined that there is only one historic structure, the entry arch. The cemetery is listed as an historic site and the reconstructed fort is ineligible. The LCS status regarding historic structures is complete at this time (1984).

II-C-2. Resource Preservation Intent Statement

The primary activity of historic preservation efforts at Bent's Old Fort National Historic Site will be routine, cyclic, and emergency maintenance for those structures which have reached their ultimate level of treatment. In other words, the management philosophy for Bent's Old Fort will be to preserve the Entry Arch in its present state. Routine maintenance will consist of those maintenance activities which occur on a seasonal basis during a given year, while cyclic maintenance will consist of those activities which occur on more than an annual basis. Emergency maintenance will be provided to the structure as the need occurs.

This Resources Management Plan: Cultural Component calls for basic preservation policies for historic structures at Bent's Old Fort National Historic Site. These are:

(1) Continued Use of Resources
(2) Adaptive Use of Resources
(3) Removal of Neglect of Resources
The continued use of resources is the policy adopted for the Entry Arch. (For original fort site and cemetery, see II-D-2.)

II-C-3. Documentation Statement

II-C-3-a. National Park Service Documentation

National Park Service documentation studies dealing with cultural resources cope with a variety of subject matter. Some types of studies include:

a. **Historic Structures Report (HSR):** Provides the historical, archeological, and architectural information necessary for carrying out the appropriate level of treatment of an historic structure and its setting (preservation, restoration, and reconstruction).

**Historic Structures Report: Bent's Old Fort, Parts I-II (1975)—** Part I of this document deals with the historical data concerning the reconstruction of Bent's Old Fort. While Part II also briefly covers some administrative data, most of this section deals with historical and archeological data about the original structure.

b. **Historic Resources Study (HRS):** Identifies, evaluates, and makes recommendations concerning the historic resources of a proposed or existing area of the National Park System.

There are several documents which serve much the same purpose in reference to the reconstruction.

**Bent's Fort, by David Lavender (1954):** This is a comprehensive book tracing the history of the Bent family from the boyhood of William and Charles in St.
Louis, through their economic empire on the Santa Fe Trail and the eventual death of Charles in New Mexico, to the abandonment of the fort and the later years of William and his children.

**Bent's Old Fort, by Enid Thompson, et. al. (1979):** This is a compilation of articles by several authors concerning the history of the original Bent's Old Fort, the lifestyle of its inhabitants, and the architectural and furnishing challenges of the reconstruction.

**Bent's Old Fort: An Archeological Study, by Jackson W. Moore, Jr. (1973):** This is a much less technical version of his actual archeological report that has been published for the public consumption. With photographs and descriptions it gives a room by room excavation of the fort and explanation of the findings.

c. **Historic Structure Preservation Guide (HSPG):** A specific guide for conducting routine and cyclical maintenance on a structure that has reached its intended ultimate level of treatment. HPSG's are normally written for Management Category A and B structures only.

Not Applicable. Because Bent's Old Fort as it presently exists in a reconstruction, a HSPG is not applicable. Other documents have been substituted which cover routine and cyclical maintenance on a reconstruction:

- **Maintenance History and Guide for Reconstructed Fort (1982)--**This traces the maintenance history of the fort on a room by room basis indicating the materials used for repair work, photographs to document the problem and the solution, and suggestions for the future maintenance of the structure.

- **Second Report/Mud Plaster Preservation Research/Bent's Old Fort National Historic Site (1977)--**This report was done in response to a serious mud-plaster erosion problem at Bent's Old Fort. It documents the research done on the problem and recommends a workable solution for this problem.
d. **Historic Furnishings Study**: Provides documented evidence of the furnishings of a historic structure at a particular time in its history and guides the accurate refurnishing of that structure.

**Furnishing Study for Bent's Old Fort Historic Site Colorado (1973)**—This study takes what is known about the furnishings of private homes, hotels, and other structures from the 1840's and makes recommendations, based on these findings, for the furnishing of the Bent's Old Fort reconstruction.

**Furnishing Plan for Bent's Old Fort National Historic Site (1974)** An analysis of the furnishings and architectural details chosen for Bent's Old Fort on a room by room basis with suggestions for their appearance, placement, interpretation, and, in some cases, elimination based on known historical data concerning the time period being interpreted.

e. **Construction Documents** in the form of plans and specifications are an excellent form of structural documentation. These may represent original conditions or later modifications, depending upon when these documents were produced.

Since the present structure called Bent's Old Fort is a reconstruction, documentation falls into two categories: a) Those documents which were drawn or written by historic figures concerning the original fort and whose accuracy may vary according to the observer and b) those documents concerning the reconstructed fort, while accurate for the reconstruction, may deviate slightly in historical accuracy from the original fort.

Category A—Maps and descriptions of the fort drawn by Lt. J. W. Abert in 1846-1847; map drawn by William Boggs based on his memory of the fort; map drawn by Charles Bent in 1908 based on memory; and others.
Category B--Architectural Study (1963): Drawings; Construction drawings, Project No. 1310-2681 (1974): Architectural, electrical, and mechanical details of fort reconstruction - 35 pages. Bent's Old Fort Project Data Sheet (No Date Given): Specifications. Bent's Old Fort (1973): A document showing the research behind the reconstruction, the preliminary design, and the working out of the problems of putting as historically accurate a reconstruction as possible to modern use. There is also a section of the materials used and standards met along with a cost estimate framework.

II-C-3-b. Existing Conditions Documentation

Statement for Management (1984)
Interim Collection Management Plan (1982)
Annual Statement for Interpretation and Visitor Services (1983)

This is an historic landscape plan which analyzes the flora observed by Lt. J. W. Abert in 1846-1847; assesses the present condition of the landscape at Bent's Old Fort; and proposes a plan for returning the area to its pre-agricultural setting.

II-D. Historic Sites Statement

Other than the cemetery there are no sites of historic significance at Bent's Old Fort, National Historic Site. The fort, because of its status as a reconstruction, has no historic value in and of itself. Various farm buildings acquired as individual tracts of land were purchased for the park were determined to be of no historic significance and razed. The DAR marker,
because it contains no intrinsic historic value and because it has been moved
will not be considered. Only the site of the fort itself, the entry arch, and
the cemetery adjacent are considered to have historic value.

The cemetery, several yards northwest of the reconstructed fort, has been
determined to contain thirteen graves, only one of which can be identified.
This is marked by a tombstone dedicated to the memory of Edward Dorris who was
buried on June 21, 1865, and postdates the period of occupation by the Bent brothers.

Although at the time the Bent brothers began building their fort it would have
been on a virgin prairie of blue grama buffalo grass, within the next few years
the area would have been denuded by overgrazing of the fort livestock as well
as those of the Indians, travelers, and the army. The area around the fort
would have looked much as it looks today after a century of farming and
livestock raising. Cottonwoods would have lined the banks of the Arkansas much
as they do today although the exotic tamarisk plant would not have been a
problem in the 1800s as it is today. Study has determined that the channel of
the Arkansas River has not varied that much over the past 150 years and would
have looked much as it does today. With the exception of the modern buildings
that can be seen in the distance, the site, in many ways, is very similar to
the one a traveler would have seen in 1846.

Routine management of the historic scene should be directed toward maintaining
the present situation wherein there are very few non-historic intrusions. It
should be remembered that the historic scene is an important historical component at Bent's Old Fort and should be preserved to enhance the historic fabric of the fort.

II-D-2. Preservation Intent

The immediate site of the original fort was irreparably altered by the reconstruction. However, extensive archeological and basic historical research was done before and during reconstruction. The cemetery was investigated archeologically and restored to the condition in which it was found when the site was acquired by the National Park Service. In 1978 Congress authorized the acquisition of additional lands to protect the historic site and scene. Intrusive structures have been removed and the land is being maintained in as historically accurate a state as possible. The cemetery is maintained on an annual basis by mowing, weeding, and resetting the stones. (Refer to Vegetation/Grazing Management Plan.) A plan to relocate the entry road will not damage the site or any archeological resources.

II-D-3. Documentation

The 1984 Statement for Management addressed several problems in relation to the routine maintenance preservation of the Bent's Old Fort National Historic Site.

In 1982 a Management Plan and Environmental Assessment study was done on the Vegetation/Grazing at Bent's Old Fort to determine problems and solutions in connection with grazing, erosion, soil compaction, and vista impact problems associated with plant use and stock grazing activities.
II-E. Archeological Statement

II-E-1. Survey Status and Description

Only archeological resources in the vicinity of the original fort structure are definitely known as archeological excavation has been limited to this area. A general survey of the area immediately bordering on the original fort structure, and adjacent lands using intensive inventory as well as black and white and color infrared photography has been completed. A few sites were located, only one of which, a lithic scatter (50T141), is believed to warrant controlled testing and possibly complete excavation.

Surface archeological remains of the original Bent's Old Fort are limited due to weathering, flooding, and the proclivity of the locals to carry off parts of the original fort to use in their own farm buildings. There is a small section of the original wall which has been incorporated into a section of reconstructed wall in the rebuilt fort. Historic maps and early drawings of the fort, as well as archeological excavations done in 1954 and the mid-1960s have indicated the position of walls, rooms, corrals, trash heaps, and a subterranean room outside the walls of the fort. A comprehensive archeological study is needed to determine more precisely the location and the importance of the subterranean remains for a more expansive interpretive story of Bent's Old Fort.

II-E-2. Documentation

In 1954, while under the ownership of the State of Colorado, Herbert W. Dick of
Trinidad State Junior College was authorized to conduct an archeological dig on the site of Bent's Old Fort. Fort walls were determined and measurements taken. This information was used in 1957 to outline the walls.

National Park Service Midwest Regional Office archeologist, Jackson W. Moore, Jr., excavated at the fort site between 1963 and 1966, after it had been obtained by the National Park Service. A much more thorough excavation was conducted than in 1954 and the walls were again established as well as many artifacts found in connection with the everyday life of the fort. Due to the proposed reconstruction of the fort it was necessary to determine "all possible information concerning construction, historic grade levels, and artifacts associated with specific features and periods...."1

In June, 1975, a two person team from the Midwest Archeological Center under the direction of R. K. Nickel surveyed lands adjacent to and within Bent's Old Fort National Historic Site. No new sites were observed, but a single site (50T141) and six find spots were recorded for lands under consideration for acquisition.

An archeological investigation including trash dump excavations, an area survey, and monitoring of fort construction and landscaping was conducted in 1976 by Douglas C. Comer. This study is presently being typed and will be available for distribution in 1985.

II-F. Park Scope of Collections Statement
II-F-1. Introduction

The park museum collection is identified as being those objects determined to be of such relevance to the park story and its significance to this nation's past that they shall receive the care necessary to preserve them in perpetuity. The "museum collection" is restricted to those objects as catalogued into the National Park Service museum records system.

The National Park Service permits and encourages the acquisition of museum objects by field collecting, gift, loan, exchange, or purchase in accordance with established procedures when these objects are clearly significant to Service areas.

The successful execution of this policy requires that the day-to-day decisions on what museum objects to acquire, and which to reject or eliminate, be wise and well planned. This Statement is a guide to sound growth and is a guard against the random expansion of the museum collection.

The goal of this collection is that it will not contain anymore or any less than is both useful and necessary.

II-F-2. Theme Representation

II-F-2-b. Historical

Bent's Old Fort National Historic Site was established to preserve and interpret the site of one of the most important fur trading outposts of the early far west. Bent's Old Fort has chosen to replace the acquisition of
historic object which cannot be used or cared for properly in the fort environment, in favor of historically accurate reproductions. Only original objects with a firm provenience to the fort, its occupants, the Indians, or the fur trade will be accepted. The purpose of historical interpretation at Bent's Old Fort will be to promote its living history program which involves 900 items purchased for use at the fort by interpreters.

II-F-3. Archival Collection

Park Records

The park's official operating records will be under the control of the File Management (March 1977); its Records Scheduling and Disposition supplement, and the General Series Administration General Records Schedules, Regulation 3, Appendix B. Museum and library collection records will be exempt from this plan.

Library Collection

The park library books are catalogued by the Dewey Decimal System. They are classified and shelved under this system. A card file is also maintained. The library consists of over 500 volumes of many topics relating to the fur trade, the Bent St. Vrain Company, Westward Expansion, the National Park Service, and others. The library contains a few rare volumes, but most of the books are rare because they are out of print rather than because they are first edition. The library is located in the fort's conference room. The books are in good condition and because of the lack of humidity require minimal maintenance at this time.
The library is used mostly for in-house research on the fur trade and related information. On occasion a person doing research for personal or professional reasons will request to use the library. The library is primarily for the use of the park staff members or institutions approved by the Superintendent which may check out books for removal from the fort premises.

The library is far from complete. In order to be more effective, more volumes on the fur trade topics will be systemically acquired. Bent's Old Fort needs to have the best fur trade research library that can be afforded.

Photo and Slide Collection

There are numerous slides, photographs and negatives in the fort files. Most have never been sorted or catalogued. This task will be completed sometime in 1985. The contents number more than 2,000 items.

The items in the slide and photo file include photos of Bent's Old Fort before, during, and after reconstruction; fort personnel; Indians; archeological excavation; and photos of other parks and historic sites as well. These photos were taken by employees while others have been donated from various outside sources.

At present the photographs and slides are in good condition, but need care and organization to be of use to the park in the long range. The disarray makes the collection nearly useless.
The photo files can be used to document the various phases of the fort's history, the appearance of the fort during these phases, and the appearance of the fort's inhabitants and owners. Photographs of sketches and paintings have been used to document and implement changes in the fort design.

II-F-4. Museum Collection

The museum collection will be managed according to NPS-28, NPS-6-Interpretation and Visitor Services Guidelines, the approved Scope of Collections Statement of April 1989, and the approved Collection Preservation Guide. Ralph H. Lewis' Manual for Museums and the National Park Service's Museum Handbook will be used, also.

The fort's museum objects have been assembled from all across the country. Many will be transferred due to problems already discussed. These objects presently number over 800 and were bought, donated or transferred to the park.

Previously the museum collection contained original historic objects as well as reproductions. The park is transferring all of the reproduction objects to the living history collection. All of these items were acquired to furnish the reconstructed Bent's Fort.

Most of the objects in this category are still in good shape. The chief enemies of these objects are heat, direct sunlight, insects, rodents, and especially dust.
The museum objects are on exhibit for the visiting public in the various rooms of the fort. Objects are available for transfer to other parts of the fort to enhance their interpretive uses. Modification of these items is, of course, not allowed.

The objects are used to illustrate important points of the park's interpretive mission. When use of physical handling is called for, a living history (reproduction object) is used.

The museum objects at Bent's Old Fort are used to create an impression for the visitor and to create the proper historic atmosphere. The proper choice and use of objects can leave a visitor with a more correct impression of the era or spark questions that lead to further research.

**Archeology Collection**

The contents of the archeological collection number more than 20,000 items. The objects were recovered during the three sanctioned archeological excavations at the Bent's Old Fort site.

The artifacts consist of many bone, charcoal, and wood fragments. The collection also contains beads, bottles, glass fragments, pot sherds, cartridge cases, gun parts, projectile parts, metal objects, tools and leather. Of particular interest are the beads, clay pipes, human skeletons, lock parts, and components of Henry and Diniger rifles and northwest guns.

The artifacts in the Archaeological collection are used as a study collection for the park. The kinds of amounts of items found in the collection along with
documentary evidence provides the park with information for purchasing correct living history items. The amount, sizes and colors of beads, for instance, allows the park to make intelligent decisions when buying beads for display or demonstration. The collection is also used for employee training and is available for inspection and study by qualified researchers. The collection has been used to compare and contrast those found at the fort with objects reported to have been found at the fort site before Park Service administration and in local museum collections.

II-F-5. Study Collection
The study or living collection is made up of more than 900 items that were purchased specifically for use at the fort by interpreters. The number of objects in the collection will increase as the fort converts "museum" reproductions to living history use and also purchases new reproductions to slowly replace original pieces. These objects deserve and receive a good standard of fare, however, since these objects are to represent objects used every day, they are used and receive "honest wear." While these items are not "antiqued" or made to look old or worn before their time, neither are they protected from being "shop worn." These objects were purchased from numerous sources including many museum and reproduction suppliers. Living history objects include everything from rifles to dish cloths and from clothing to pocket watches. Living history objects may even include items like bacon, hams, and jerky for interpretive demonstrations and consumption by costumed interpreters.
The living history objects are issued to the seasonal and permanent interpretive staff at the beginning of the park season when costumed living history starts. The objects are worn or used until the end of the season when they are turned back in. The staff is held accountable for objects and records are kept on issued items. The use of designated living history items eliminates the need to use original or museum objects.

II-F-6. Acquisition

There shall be no indiscriminate collecting permitted within the park. All collecting must be done in accordance with established rules and regulations. Donations must be unconditional gifts. The loans must be for a specific purpose and for a definite length of time. Objects left at the park for possible acquisition shall be receipted and either accepted or returned within 30 days.

If an item is found or turned in as a potential museum specimen, it will be considered for its potential value to the museum collection. If it is determined to be of value to the collection, all the data will be gathered on the item including date, who found it, where it was found, condition of the object, and history on the object (if known), name of receiver and any other pertinent information. The item and attached information will be delivered to the Chief Interpreter. The Chief Interpreter will then determine whether the item is needed in the collection and if it fits into the scope of collections.
ENDNOTES

III. CULTURAL RESOURCE INVENTORY

III-A. Historic Structures Inventory, LCS Matrix Form

The list of Classified Structures Survey Matrix is a management tool that has been developed and included in this Cultural Resources Management Plan. Its purpose is to indicate to Park Management the current status and intended treatment of any particular historic structure covered under this plan, current DCPs and GMPs. The scope and rationale of historic preservation at Bent's Old Fort National Historic Site were discussed in the previous section, and the LCS Survey Matrix summarizes that information on a building-specific basis. The categories of information found on the matrix will be briefly discussed.

III-A.1. Resource

The first item of information found on the matrix is the particular name of the resource and its location, if it is in an easily identified area or district. If the location has not been indicated then the List of Classified Structures Base Map in the Appendices should be consulted.

III-A.2. LCS Number

The LCS number indicated after the name of each structure is also the official building number established by the park. Since a park building is usually referred to by its building number, all resource on the matrix are listed in numerical order for easy reference. The "HS" designation denotes historic structure status, and should always be used in conjunction with the number in all correspondence regarding such a building.

Each cultural resource entered on the List of Classified Structures has none of four Management Category designations assigned to it. The four Management Category designations are described in NPS-28, Chapter 3, and it is recommended that Park Management be familiar with them. Note that all structures listed on the LCS are eligible or potentially eligible, unless otherwise determined, and appropriate compliance procedures must be followed. These category designations are listed and briefly described below:

A - structure must be preserved and maintained
B - structure should be preserved and maintained
C - structure may be preserved and maintained
D - structure can be demolished, disposed of, or altered for some other management purpose.

III-A-4. National Register Status

Following the Management Category designation on the Matrix is information regarding the National Register status of each listed historic structure. This information included:

a. Level of significance—either local, state, or national
b. Eligibility—there are seven possible entries
   (1) Listed and documented
   (2) Listed and undocumented
   (3) Determined eligible by Chief of Registration
   (4) Determined eligible by State Historic Preservation Officer
(5) Determined potentially eligible by Regional Historic Preservation Team and park

(6) Undetermined; no action initiated

(7) Determined ineligible by State Historic Preservation Officer

c. Nomination status--date of action


This category specifies the course of action agreed upon between the park and the region which will guide present and future actions affecting any listed structure. The alternatives include preservation, restoration, adaptive use, removal, and natural deterioration (moldering ruin). In some cases it is possible for the exterior of a structure to have one management policy while the interior has another.

III-A-6. Treatment

There are a number of possible treatments that may be necessary to carry out the management policies for historic structures listed on the matrix. These include:

a. Routine and Cyclic Maintenance
b. Continuation of Present Use
c. Health-Life Safety Modifications
d. Stabilization
e. Upgrade Interior
f. Restore/Preserve Exterior
III-A-7. **Requirements**

The agreed upon management policy for a particular historic structure listed on the matrix may necessitate additional measures before it can be implemented.

The requirements listed below are discussed in greater detail in Section II: "Management Policies Affecting Cultural Resources."

a. National Park Service Documentation
   (1) Historic Structures Report
   (2) Historic Resources Study
   (3) Historic Structures Preservation Guide
   (4) Historic Furnishings Study

b. HBS recording

c. Construction documents

d. Compliance requirements

III-A-8. **Decision Assessment**

Decisions regarding cultural properties were made based on approved planning documents, other approved decision making documents, or after evaluation and assessment by an Interdisciplinary Team in the Regional Office and park. This supporting documentation is identified in the matrix as either CMP, DCP, or Interdisciplinary Team (known as IT).


The "Remarks" column on the matrix is for noting anything pertinent to the ongoing or ultimate treatment of any historic structure listed. The suggested list below deals with planning, construction, and funding issues.
a. Completed documentation
b. Completed treatment
c. "D" management category explanation
d. Programmed requirements:
   (1) PRIP
   (2) Construction Package
   (3) Cultural Resource Program Package
   (4) Other
e. Funding requirements
   (1) 10-237 base funding
   (2) 10-238 project funding
   (3) PRIP package

III-B. Archeological Inventory

III-B-1. Archeological Inventory

The park's archeological inventory consists of all recorded sites in the park and is added to whenever new sites are located. Isolated artifacts are not included in the listing, but are considered a part of the park's archeological materials.

a. Site 50T141: Possible late prehistoric campsite; ca. 100'EW x 50'NS

III-B-2. Priority Listing

Because the original site of Bent's Old Fort has already been excavated and studied and the reconstruction has irreparably altered the site, it would be impossible to consider further excavation as a priority item except for a subterranean room located outside the walls of the fort on the west side.
This, along with an "early construction phase" refuse pit, were uncovered in 1975 while the Laboratory of Public Archaeology at Colorado State University was monitoring earth moving operations in connection with the Bent's Old Fort reconstruction. Further excavation of this room would be advisable. The archeological survey conducted by R. K. Nickel in 1976 of the site and later purchased adjacent lands indicated that Site 50T141 also qualified for systematic testing.

III-B-3. Planning Document Analysis
Planning documents do not indicate any new archeological work at Bent's Old Fort nor will any future park development presently proposed interfere with any archeological sites. Planning documents indicate a need for further archeological investigation but a lack of funding has postponed this indefinitely.

III-B-4. Treatment
All archeological sites within the park are protected by Federal legislation (Antiquities Act of 1906, 1979 Archeological Resource Protection Act, Executive Order 11593) and Park Service Historic Preservation policies (NPS-28). New archeological sites should be avoided during construction activities of any kind (programmed, day labor), and all future plans should be designed to avoid potential impacts. Thorough evaluation of potential impacts to these sites should be undertaken prior to any rehabilitation, repair, or upgrading. Appropriate mitigation work should be carried out, and the presence of any archeologist during construction may be necessary.
Preservation of these remains is the goal whether it be through avoidance, education of the public, or archeological mitigation if there is no feasible alternative to site disturbance.

III-B-5. Legislative Compliance

No archeological sites, other than the site of the original fort itself, are listed on, determined eligible for, or appear to meet the Criteria of Significance for listing on the National Register of Historic Places. Further survey and evaluation of the park's archeological resources may yield archeological remains that warrant nomination to the National Register.
<table>
<thead>
<tr>
<th>RESOURCE</th>
<th>LCS No.</th>
<th>MGT. CAT.</th>
<th>SIG.</th>
<th>ELIGIBILITY*</th>
<th>NOMINATION STATUS</th>
<th>MANAGEMENT POLICY</th>
<th>TREATMENT</th>
<th>REQUIREMENTS</th>
<th>DECISION ASSESSMENT</th>
<th>REMARKS</th>
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<tr>
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<td>Preservation</td>
<td>Routine and Cyclic Maintenance</td>
<td>HSR, HSPG</td>
<td>SFM Problem Statement</td>
<td>Reconstruction built on actual archeological site—will be listed on CSI</td>
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<td>HSR, HPS</td>
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<td>IV-C</td>
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<td>BEOL-2</td>
<td>A</td>
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<td>SFM Problem Statement</td>
<td>IV-C</td>
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<td>Routine and Cyclic Maintenance</td>
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<td>HSR, HSPG</td>
<td>SFM Problem Statement</td>
<td>IV-C</td>
</tr>
</tbody>
</table>

*Entered according to NPA of 1966—draft park-wide nomination has been completed—eligibility should be determined in mid-1983.

**Total reconstruction of original fort building which is maintained as an historic structure must be and is the central focus of the historic site. Legislative mandate to reconstruct and maintain it.
IV. CULTURAL RESOURCES MANAGEMENT PROBLEMS ASSESSMENT

IV-A. Problem: Arkansas River Channelization

A proposal of the Army Corps of Engineers to channelize the Arkansas River would affect the historical integrity of the site. An agreement reached in 1966 provides for some water to continue in the old channel, if a new channel is constructed. This project has not been implemented yet.

Alternatives

1. No Action. Rely on Army Corps of Engineers to hold to 1966 agreement in the hope that the effect on the historical integrity of the site would be minimal.

2. Renegotiation of agreement with Army Corps of Engineers. Under this alternative the agreement with the Corps of Engineers would be re-negotiated taking into account advanced methods of flood control showing specific effects on the site.

3. Negation of present agreement. The present agreement between Bent's Old Fort and the Army Corps of Engineers would be negated and the latter would be free to do their project as they wish which would irreparably damage the historic site and scene.

Selected Alternative

2. This would allow Bent's Old Fort to review and update the agreement based on current thinking about flood control and the increased economic value of the site, i.e. the reconstructed fort building and other physical improvements.

Recommended: [Signature]

Approved: [Signature]
IV-B. Problem: Growth of Exotic Tamarisk Plants (Tamarix pentandra)

Along the banks of the Arkansas River exotic Tamarisk plants are continuing to replace the native plants and erode the historic scene.

Alternatives

1. No Action. Tamarisk plants would be allowed to continue growing and eventually replace native plants cutting off the view of the river from the fort.

2. Cyclic Maintenance. In areas on the north bank where eradication procedures have previously been carried out on a one-time basis, establish a cyclic maintenance program which would continue on a 6-year cycle.

3. Radical Eradication. Eradication would be carried out on both sides of the Arkansas River for the full length of the property which would contribute to the historic scene. This would be very expensive and not too cost effective or practical.

Selected Alternative

2. A cyclic program of this size would be most cost effective given the size of the project and the benefits to the continuing maintenance of the historic scene.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Regional Director
IV-C. Problem: Vegetation Management Program

The vegetation on the 800 acres comprising Bent's Old Fort National Historic Site is mostly unmanaged with the exception of the area immediately surrounding the fort. The goal of the proposed vegetation management program would be to bring the vegetation to a close approximation of the general conditions that existed during the year 1846.

Alternatives

1. No Action. Allow land to do what it will permitting the growth of exotic plants and noxious weeds which will cause problems with the agricultural neighbors surrounding the fort site.

2. Present Plan. This alternative would maintain the present Vegetation/Grazing Management Plan.

3. Restore Historic Scene. Under this alternative the present scene (or ground cover) would be literally denuded with overgrazing and cattle drives across it. Most of the trees presently growing in the area would be removed. This would approximate the 1846 scene.

Selected Alternative

2. This plan was developed recently and is valid for our objectives.

Recommended: [Signature] Superintendent

Approved: [Signature] Acting Regional Director
IV-D. Problem: Historical Integrity of Man-Made Landscape Viewed from the Fort

Farm buildings and farming activities can be viewed from the reconstructed fort. Commercial development of land surrounding the site would further deteriorate the historic scene.

Alternatives

1. No Action. This would mean opposing commercial development and use of the surrounding fort lands which would destroy the historical integrity of the view by the only means available: County zoning.

2. Negotiate. An historic zone 1/4 to 2 miles wide would be negotiated with the county as a buffer between the site and the surrounding farms. (This would be in addition to the zoning as above).

3. Acquisition. Additional land would be acquired through easement or in fee so there would be no further commercial development in those areas visible from the fort.

Selected Alternative

2. The purchase and upkeep of additional lands of scenic easements would present an unnecessary burden on the taxpayer if other activities are feasible. Sometimes zoning changes are made without the knowledge of all concerned, but with the addition of an historic buffer zone in the county land use plan we would have a better chance to oppose unwanted changes in land status.

Recommended: [Signature]

Approved: [Signature]
IV-E. Problem: Military Aircraft Overflights of Site

Flight patterns of B-52 military aircraft on training flights over the fort site destroy historical integrity in both sight and sound.

Alternatives

1. No Action. Military overflights will continue at the site.
2. Negotiation. An agreement would be negotiated with the Strategic Air Command to instruct aircraft commanders to avoid the Bent's Old Fort site.
3. Relocation. Pursue the possibility with the Department of Defense of relocating training routes and facilities away from this area.

Selected Alternative

2. It is not practical or feasible to ask the Department of Defense to move the training route (however, it might happen for some other reason in the future) so it would seem reasonable to try to enlist the cooperation of the Strategic Air Command in instructing their pilots to avoid the fort as it is at the far edge of the training route.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Acting Regional Director
IV-F. Problem: Flood Potential of Arkansas River

The fort site is in the Arkansas River flood plain and, although the Pueblo Dam and Reservoir were built in the 1960s to provide water storage and flood control, three major contributors to the Arkansas River system lie between the fort and the dam. The worst flood occurred in 1921 and is considered to be a 100-year flood. A 50-year flood occurred in 1965. Flood potential needs to be re-evaluated and defined to provide resource protection and visitor safety with minimal impact on the historic scene.

Alternatives

1. No Action. If no action is taken, the possibility of the site being destroyed or severely damaged is great.

2. Re-evaluation. The flood control plan done in 1968 should be re-evaluated and new or additional methods of flood control be determined, if possible.

3. New Plan. The Army Corps of Engineers, under this alternative, would come up with a new flood safety plan for Bent's Old Fort which could lead to intrusions on the historic scene (see IV-A).

Selected Alternative

2. While this may be similar to IV-A, the site could be severely damaged by a flood. (This is always a problem with trying to preserve a static point in time in a dynamic world.) But to do nothing, thereby endangering a large capital investment, or to allow a large scene-destroying channelization project seems improper. Therefore, new study and thinking appears to be the answer.

Recommended: [Signature]

Approved: [Signature]
IV-G. Problem: Deterioration of Archeological Resources in Storage

Presently the archeological collection is stored in a portion of the fort building. Because this is not a controlled environment, resources are subject to deterioration.

Alternatives

1. No Action. Allow continued deterioration where there is already serious deterioration.

2. Removal. This alternative would remove the collection and place it in proper storage facilities in a newly proposed office/storage building to be built near the present maintenance building.

3. Relocation. Collection would be crated and sent to the Midwest Archeological Center for storage.

Selected Alternative

2. Bent's Old Fort has been mandated to preserve the collection so something must be done. To remove the collection from the site would destroy a certain flavor of the site and make it difficult for the materials to be viewed or studied by visitors.

Recommended: [Signature]

Approved: [Signature]
IV-H. Problem: Water Rights

Well Number 3, located in the maintenance building, must maintain a minimum of 10-gallons per minute to meet current and future park needs for sanitary services and 75 pounds pressure for minimum fire protection. The well is under adjudication by the State of Colorado and there is not sufficient water pressure on the system to provide good fire protection.

Alternatives

1. No Action. This would lead to the loss of water rights due to adjudication by the State of Colorado and the inability to maintain water pressure necessary for fire protection.

2. Continue water rights litigation and devise adequate pressurization for this system. This would allow Bent’s Old Fort to maintain an adequate water supply. Install equipment necessary to maintain water pressure for fire protection.

3. Abandon the well and tie the system to the potable system serviced by the Bent’s Fort Water Company.

Selected Alternative

2. Bent's Old Fort has invested a considerable amount of time and money in the present system and with a small amount of additional effort the system will meet the site's needs. The other alternatives would either not provide the service needed (1) or not be cost effective (3).

Recommended: [Signature]
Superintendent

Approved: [Signature]
Regional Director
IV-I. Problem: Mineral Rights

Future mineral exploration and/or development can occur within the boundaries of Bent's Old Fort as the fort does not own or control any of the mineral rights.

Alternatives

1. No Action. Some gold panning and mineral exploration (e.g. hydraulic mining) has already occurred on the Arkansas River. Even without discovering anything of value, the exploration itself can be destructive of the historic scene in both sight and sound.

2. Obtain mineral rights. The present ownership of mineral rights on the historic site should be researched and an attempt be made to acquire through donation or purchase those that have high potential for exploration as covered under the Land Protection Plan.

3. Injunction. Bent's Old Fort should obtain through injunction and/or legislation a way of preventing access to minerals on the site.

Selected Alternative

2. The Land Protection Plan will provide direction in the acquisition of the necessary mineral rights. There will be the continuing problem of funds to acquire these rights.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Regional Director
IV-J. Problem: Insects

Stinging insects such as bees and wasps are a major concern during much of the visitor season due to the agricultural setting of the site and the attraction the insects have for adobe buildings.

Alternatives

1. No Action. To do nothing would continually cause a hazard to the visitor and staff and interfere with the enjoyment of the site.

2. Revise pest management plan to include a method of localized control of bees and wasps. This would protect visitors and staff from stinging insects during excessive outbreaks and provide a warning to visitors in their initial orientation.

3. Eradication. This would require a county-wide plan to eradicate insects during excessive outbreaks. This would also affect the agricultural future of the Arkansas Valley as many of this type of insect are necessary for propagation of plants.

Selected Alternative

2. This would provide a reasonable method of dealing with this problem without undue harm to the surrounding environment.

Recommended: [Signature]

Approved: [Signature]
IV-K. **Problem: Lack of Adequate Staffing during High Visitation Periods**

Inadequate staffing increases the security problems associated with handling large numbers of people. Historic objects cannot be under surveillance at all times. Even secured objects have been stolen.

**Alternatives**

1. **No Action.** This would cause the fort to continue to experience losses and damage to cultural resources.
2. **Increase staff during high visitor use season.**
3. **Close areas of fort.** This alternative would close designated areas of the fort to public access and therefore decrease enjoyment of the site.

**Selected Alternative**

2. **Would provide security for cultural resources while allowing the visitor complete access to all the fort areas thereby providing a good interpretive program.**

**Recommended:***

**Approved:***
IV-1. Problem: No Established Cyclic Replacement Program

The constant use of reproduction objects for historical interpretation programs causes them to wear out and need to be replaced. There is presently no cyclic replacement program. Many of the items are expensive and it is not practical to buy them from operating funds. Also, the same amount of funds are not needed each year, therefore, a specific schedule and program needs to be developed.

Alternatives

1. No Action. As reproductions wear out there would be fewer and fewer furnishings to be used in our interpretive program, thereby making our programs less effective to the visitor.

2. To establish an adequate cyclic replacement program.

3. To periodically ask for an appropriation to replace worn-out objects en masse or replace objects from regular operating funds.

Selected Alternative

2. This alternative would establish a long range program for replacement and acquisition of reproduction furnishings for the fort with an estimation of the useful life of each object and schedule for replacement.

Recommended: [Signature]

Approved: [Signature]

[Position]

[Position]
IV-M. Problem: Creation of New Park Entrance on Highway 50

A new entrance into the site has been proposed off Highway 50 with a footbridge across the Arkansas River. The proposal has been approved but no construction funds have been made available.

Alternatives

1. No Action. The present road providing access to Bent's Old Fort is Colorado 194 which is designated a farm-to-market road containing slow moving equipment and other farm vehicles. This is viewed unsafe for park visitor use and for the farmer.

2. New access. A new access would be constructed off Highway 50 with a parking area on the south side of the Arkansas. A non-intrusive foot bridge would allow visitors and staff to reach the fort site.

3. Improve 194. Working with the State Highway Department the present entrance to the site off Colorado 194 would be improved with the addition of passing lanes.

Selected Alternative

2. This alternative would relieve the congestion and traffic conflicts on Highway 194 with no expense to the State of Colorado and, in addition, make the site easier to locate and more accessible to a larger number of the visiting public.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Acting Regional Director
IV-14

IV-N. Problem: Location of Park Offices

Presently a portion of the fort (wagon shed) is used for park administrative offices and storage for the archeological collection. This detracts from the historic integrity of the fort and limits the areas of the fort open to visitors as well as providing improper and inadequate storage. Separation of these offices from the maintenance building near Colorado 194 is inefficient.

Alternatives

1. No Action. This would continue the present problems of inefficiency, limited access, and intrusion of the historic scene.

2. Relocation. Offices would be relocated and proper archeological storage created in a new building utilizing the latest in passive and active solar systems to continually support management efficiency.

3. A new visitor center/restroom complex would be built near the entrance and the offices and storage relocated to this building.

Selected Alternative

2. The present location presents the problems of trying to fit the 20th Century into a 19th Century building. The problems of modern utilities, particularly heating and communications, are practically unsolvable plus the intrusion of the sights and sounds of the 20th Century (air conditioner running, trucks delivering supplies, etc.) detract from the historic scene. A small office/storage building would alleviate these problems.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Acting Regional Director
IV-0. **Problem: Lack of Continuing Historic Research**

Even though historic and prehistoric surveys have indicated a need for continuing basic research about the site, only some has been done.

**Alternatives**

1. **No Action.** This would continue the problem of little public knowledge of the site and reduce the resources available to both the staff and visitor. Present staff would continue to do basic research on a time-available basis.

2. Interest outside academic involvement in research concerning the site, possibly with a scholarship program.

3. Hire a research historian as a permanent member of the staff.

**Selected Alternative**

2. A seasonal position, perhaps on some type of internship program with a university, would solve the need for continuing research in the most economical manner.

**Recommended:**

[Signature]

**Approved:**

[Signature]

Superintendent

Regional Director
IV-P. Problem: Need for More Storage Space for Supplies and Equipment

Present storage space for maintenance equipment and materials is insufficient for fort needs.

Alternatives

1. No Action. Continue to store valuable supplies and equipment outside under adverse weather conditions.

2. Expansion. The present maintenance area would be expanded by building open sheds and an additional 4,000 square feet of enclosed storage.

3. Rebuilding. The entire maintenance building would be rebuilt into a facility more appropriate to the fort's present operational needs.

Selected Alternative

2. The addition of this type of storage would allow the discontinuance of using an open pit near the fort for storage of scaffolding and other similar equipment in the open and replacement of an old semi-trailer for enclosed storage of supplies.

Recommended: 

Approved:
IV-Q. Problem: Handicap Access

Although transportation from the parking lot to the reconstructed fort is provided for the handicapped by fort staff, once the person is at the fort very little more can be done. Stairways and parapets without handrails make it dangerous or impossible for many handicapped persons to enjoy all the reconstruction has to offer. (Rest rooms and closed captioning of A. V. program are available.)

Alternatives
1. No Action. Continued inability by the physically handicapped to see upper level of the fort and some of the lower level rooms not accessible by wheelchairs.
2. Modification. Portable door ramps would be provided to allow for wheelchair access of lower level rooms and a modification of the interpretive approach to those barred from the upper level.
3. Construction. Hoists, elevators, and other access facilities would be constructed. These would be detrimental to the historic scene and not cost-effective with the small number of handicapped visitors at Bent's Old Fort.

Selected Alternative
2. These steps would be the most practical solution to the problem. The methods outlined in Alternative 3 would not be cost-effective for the number of
handicapped visiting the fort. In discussing this problem with an expert from
the Veterans Administration and many disabled persons, the steps outlined in
Alternative 2 would be best.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Regional Director
IV-R. Problem: Affirmative Action Plan/Minority Recruitment

Due to the size and location of the area and the low grade structure of the jobs, it is difficult to find qualified minority persons willing to take a position at the fort.

Alternatives

1. No Action. Continued lack of involvement by minorities in the interpretive program detracts from the historical authenticity of the fort scene.

2. Increase grade and recruitment efforts that would lead to a historically accurate interpretive program.

3. Designate a person for a specific time for the purpose of recruiting qualified minority persons for staff positions.

Selected Alternative

2. Re-evaluate the interpretive positions to make sure the responsibilities are recognized and the grades are at the proper level and change the already ongoing recruitment program to reflect this.

Recommended: [Signature]

Approved: [Signature]
IV-S. Problem: Noxious Weeds

A lack of funds has prevented the removal of noxious weeds as recommended in the Vegetation Management Plan. Mowing done periodically is a preferable method to chemicals, but cost is a factor.

Alternatives

1. No Action. Weeds would destroy historical integrity of the site as well as conflict with the agricultural interests of the surrounding farms.
2. Follow a recommended range management program with the U. S. D. A. soil Conservation Program.
3. Non-specific chemical spraying.

Selected Alternative

2. The Soil Conservation Service is going to provide Bent's Old Fort with a range management plan for the fort in addition to the proposed reseeding funds already in the cyclic maintenance. A 10-238 will be submitted to implement this plan if additional funding is necessary.

Recommended: [Signature]

Approved: [Signature]
IV-T. Problem: Additional Maintenance

There is an insufficient maintenance staff to keep the historical integrity of the fort building at an optimum level for visitor enjoyment during the heavy use season.

Alternatives

1. No Action. Fort will be in a constant state of repair with the necessary modern methods of construction intruding on the historic scene during high visitor use seasons.

2. Increase FTEs for the maintenance staff to a point that would allow projects to be finished in a more timely manner.

3. Pay overtime to present staff until job in concluded (non cost-effective).

Selected Alternatives

2. By using this method, the part of the maintenance staff that is permanent, but part-time would be converted to full-time and could complete many projects during the off season allowing the impact on the historic scene to be less.

Recommended: [Signature]

Superintendent

Approved: [Signature]

Regional Director
IV-U. Problem: Administrative History

There has been no administrative history written for the Bent's Old Fort National Historic Site which would provide background information concerning the ownership of the site by the National Park Service and its subsequent development. All histories written heretofore have concerned themselves with the chronological history of the area and the original fort or with the series of events which brought about National Park Service ownership and development.

Alternatives

1. No Action. A continuation of the present problem and its lack of concise and easily referenced information would take place.

2. Authorization of an administrative history. This would provide both the park and the regional office with a guide to the development of the park, its problems, and its administrative philosophies and actions.

Selected Alternative

2. Along with the published chronological histories, the Statements for Management, the Resources Management Plan—Cultural Component, and other documents, an administrative history would provide the "missing link" to a thorough understanding of the park, its resources and its needs.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Regional Director
IV-V. Problem: Dispersement of Archeological Collection

Archeological excavations have been conducted at Bent's Old Fort by a number of archeologists from a variety of institutions and organizations. A complete inventory of materials collected and organizations where these materials are stored does not exist.

Alternatives

1. No Action. Materials will not be available for interpretation, items may be lost, and/or deterioration may occur.

2. An inventory of the Bent's Old Fort materials and storage facilities should be conducted. This would allow informed management decisions regarding the materials available for interpretation, storage requirements, stabilization needs, and the possible consolidation of the collection from multiple locations.

Selected Alternative

2. This inventory will provide data necessary for informed management decisions and should be conducted prior to other work being done on or with the collection. An incomplete inventory limits materials available for study, for viewing by visitors, and deterioration of certain items may occur.

Recommended: [Signature]

Approved: [Signature]
IV-W. Problem: Use of Non-Historic Materials and Methods for Maintenance and Repair

Although Bent's Old Fort is a reconstruction, maintenance and repair of the reconstructed building fabric presents potential problems in perpetuating authenticity for interpretive purposes.

Alternatives

1. No Action. Adobe structures, particularly when coupled with modern structural materials, have a limited life span and failure to maintain and repair would make complete deterioration inevitable.

2. Use of only historically accurate materials and methods in fort maintenance and repair.

3. Use of non-historic materials and methods whenever historic ones are not practical or economically feasible and when they do not interfere with interpretive authenticity.

Selected Alternative

3. The maintenance problems at Bent's Old Fort stem from the fact that it is a structure which by law must be "perpetuated in perpetuity," but is constructed of materials which are extremely temporal. Originally the intent was to utilize maintenance procedures as part of the interpretive program, since adobe structures would have had maintenance performed on a regular basis anyway. Unfortunately, this use of maintenance in interpretation was never funded. However, regular maintenance and repair is necessary to prolong the life of the structure. Where practical, historically accurate materials will be used (e.g. replacement of wood members such as vigas, latias, and door and
window frames). In some instances modern materials and methods may be more practical and cost-effective. Care will be given in how these materials and methods are applied. They will be used only when authenticity for interpretive purposes can be maintained. Modern roof systems will continue to be used and electrical systems will continue to be maintained to meet health, life and safety codes. Adobe walls will continue to be replaced with concrete block and concrete stucco. In all instances care will be exercised to make sure that new materials will replicate or be hidden to insure that the structure will be historically accurate for interpretation.

Recommended: [signature]

Superintendent

Approved: [signature]

Regional Director
IV-X. Problem: Special Use Permits for Agricultural Purposes

At present, Surface Tracts #01-105 and #01-108 are being utilized through the Special Use Permits program. Before these permits expire in 1987 and 1993 respectively, the future uses of these lands should be studied.

Alternatives

1. Continue Special Use Permits and study the uses of these tracts. This allows for uses (e.g. haying and growing of grain crops) which may be inappropriate to the historic scene and therefore have a somewhat adverse impact on that scene. At the same time, agricultural products from one of these tracts (e.g. hay) are used as payment and form a large part of the feed necessary to maintain the park Living History livestock. Other uses (e.g. grazing) may be compatible with and therefore enhance the historic scene.

2. Historic Property Leasing. This would entail the conversion of the Special Use Permits to Historic Property Leasing under the current structures of the program. As the tracts under study are not presently part of the revised National Register Nomination boundaries, they would not qualify for Historic Property Leasing. If these boundaries were adjusted for appropriate reasons, any and all leases would have to be for historically compatible uses.

3. Historic Zoning. Under this, the land would be included by management in its historic zone and follow a Range Management Program (see Vegetative Management Plan). This would help add to the historic scene designed to protect the view from the fort from land uses incompatible with the fort's interpretation.
Selected Alternative

1. By the time the permits expire a long time rationale for use of these tracts will be developed based on economic need, value to the historic scene, and political considerations.

Recommended: [Signature]
Superintendent

Approved: [Signature]
Regional Director
V. APPENDICES

V-A. Bibliography

V-A-1. Anthropological/Archeological References

V-A-1-a. Published


V-A-2. Historical/Architectural References

V-A-2-a. Published


ASSESSMENT OF EFFECT FORM

ASSESSMENT OF ACTIONS HAVING AN EFFECT ON CULTURAL RESOURCES
(Attach continuation sheets as necessary)

This form is required for all actions that have the potential to affect cultural properties.

1. PARK: __________________________

2. PROJECT TITLE AND NUMBER: ____________________________________________

3. PREPARED BY: ______________________ PHONE: ______________________
   (This is to be prepared by the park resource specialist)

   Preservation Maintenance ___ Energy Retrofit ___

5. Cultural resource(s) affected by proposed action/name and LCS or CSI (archeological site) number(s), if applicable:

6. The proposed action will (check as many as apply):
   ___ Destroy historic fabric.
   ___ Remove historic fabric.
   ___ Replace historic fabric in kind.
   ___ Add nonhistoric elements to a historic structure.
   ___ Remove nonhistoric elements from a historic structure.
   ___ Alter historic terrain, groundcover, or vegetation.
   ___ Introduce nonhistoric elements (visible, audible, or atmospheric) into a historic setting or environment.
   ___ Reintroduce historic elements in a historic setting or environment.
   ___ Remove historic elements from a historic environment.
   ___ Remove nonhistoric elements from a historic environment.
   ___ Disturb, destroy, impair, or render inaccessible archeological (surface or subsurface) resources.
   ___ Possibly disturb presently unidentified archeological resources or historic fabric.
   ___ Incur gradual deterioration of historic fabric, terrain, or setting.
   ___ Other (Describe briefly):
7. Description of proposed action(s) and effect(s): (Include date and location of project and intensity of effects to each structure or archeological site.) Use additional sheet if necessary.

8. Explain why the action is needed:

9. Documentation (attach): (1) photographs of existing conditions, (2) site plans, (3) preliminary designs or construction documents.

10. Has area been surveyed for historic and archeological remains?

    ___ No: Source of Information ________________________________
    Is survey scheduled? ___ No ___ Yes: Date ____________

    ___ Yes:

        1) Results of Survey ________________________________

        2) Do Base Maps exist? ___ No ___ Yes: Where? ____________

        3) Report(s) Reference(s) ________________________________

        Level of Archeological Work: ___ Reconnaissance ___ Sample
        ___ Intensive ___ Tested ___ excavated

        ___ N/A.

11. Has area been disturbed in the past? ___ No ___ Yes ___ N/A:
    Explain nature and intensity of disturbance.

12. ( ) Implementing action included in plan under PMOA.

    (Title, Section)

    ( ) Other PMOA Action.  (Title, Section)

    ( ) Resource Management Plan (RMP) Number.

    ( ) Action not under PMOA.
13. Recommended Determination of Effect.

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<th>No Adverse Effect</th>
<th>Adverse Effect</th>
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</tbody>
</table>

14. Proposed mitigation and any additional needs:

15. Is the mitigation work scheduled? ___ No ___ Yes:
   with REGION ______
   with ARCHEOLOGICAL CENTER ______

I certify that the work proposed meets the guidelines contained in NPS-28 and that the proposal incorporates all feasible measures to minimize adverse effects to cultural resources.

________________________________________  ________________________
Superintendent                         Date
Concur: __________________________
Regional Historian

_______________________________
Regional Archeologist

_______________________________
Regional Architect

_______________________________
Regional Curator

106 Necessary: _____ No _____ Yes: __________________________
Determined by

Concur: __________________________
Regional Director Date

Unresolved Dispute: __________________________
Regional Director

Sustained Proposed Action: __________________________
Associate Director, Cultural Resources Management

Overrule Proposed Action: __________________________
Associate Director, Cultural Resources Management
V-D. Planning Team

Jerry R. Phillips, Park Superintendent; Thomas J. Cox, Jr., Chief of Maintenance; Nancy Jane Cushing, Chief of Interpretation; Alexandra Aldred, Living History Supervisor; Barton H. Barbour, Museum Technician; Susan A. Tenney, Historian.