



History Colorado

September 4, 2025

Eric Leonard
Superintendent
National Park Service
High Plains Group
35110 Highway 194 East
La Junta, CO 81050
dominic_henry@nps.gov

RE: Section 110 Determination of National Register Eligibility, Bent's Old Fort (5OT.149), Otero County (HC #85784)

Dear Mr. Leonard:

Thank you for your recent correspondence dated July 31, 2025, received by our office July 31, 2025, requesting review of the above referenced materials under Section 110 of the National Historic Preservation Act (NHPA). Our office has reviewed the submitted materials, and we offer the following comment.

Identification of Historic Properties

In our letter dated March 24, 2025, we found that the reconstructed Bent's Old Fort is eligible for listing on the National Register of Historic Places. Your office concurred with this determination of eligibility in the revised Architectural Inventory Form #1403 submitted with your July 31, 2025 letter. However, while we concur with the ultimate finding of National Register eligibility, we do not concur with some of the positions and conclusions presented within the body of the form.

The Fort is eligible for the National Register under Criterion A for "its contribution to evolving ideas pertaining to the historic preservation movement in the United States throughout the 1910s-1970s." Its construction was specifically timed to fall between the nation's bicentennial on July 4th and the state's Centennial on August 1st (the dedication ceremony was held on July 25th).

Colorado, located far from what the Thirteen Colonies considered "The West," had no direct connection to the events and battles that constituted the American Revolution; "(d)espite George Washington's reputation for having slept in many different places," wrote Yale University's Howard Lamar in 1976, "he never spent a night in Colorado." Accordingly, state and local leaders concentrated instead on "finding new ways to commemorate the birth of the Republic," such as highlighting local examples of 'pioneer spirit,' exploration, nation-building, unity, and freedom. The reconstructed Fort, then, represents the attitudes, spirit, and events of 1976, itself a historical year centered on a historical event, and not the 19th century. As we stated in our March 24, 2025 letter, "whether the fort, in NPS's current opinion, evokes an accurate sense of 19th century frontier life is irrelevant," as a "bystander from the year 1976" would easily be able to recognize the Fort "upon being transported to the year 2025."

However, the revised form spends a great deal of time and effort expounding on the idea that the Fort is somehow inferior: that it includes "significant guesswork"; was based on "an incomplete picture"; and

“conveyed ‘authenticity’ at the cost of accuracy.” As in our previous letter, we reject this argument as being irrelevant. The Fort is properly evaluated as a product of 1976, not 1833.

In its evaluation for eligibility under Criterion C, NPS writes that “as a reconstruction, Bent’s Old Fort is not a significant example of a particular type or method of construction.” We do not concur. After stating that “the reconstruction... is an example of practical methods of incorporating modern building systems into a historically inspired shell,” the section concludes, contradictorily, that “it does not display the distinctive characteristics that would enable it to be considered a true representation of a specific type, period, or method of construction.” If the Fort is significant as an example of “mid-century heritage tourism practices,” which merged historical research with the needs of safely operating and maintaining a busy historic site- and we concur that it is- then the Fort’s design, engineering, and materials should likewise be recognized as a good example of that very sort of mid-century heritage design.

To this point, we encourage NPS to consider evaluating the Fort’s design and engineering in comparison with other NPS reconstructions of the era, with the goal of determining whether or not it is a good example of its type when compared with its peers.

Finally, we wish to note for the record that there is nothing inherent in the Fort’s design, engineering, or use that necessitated the “removal of the second-floor porches, cistern, and livestock shelter,” among other alterations enumerated by NPS in Section 44 of the form.

Adobe has, since the beginning of human civilization, been recognized as a dynamic building material that is easy to utilize, easy to repair, and very durable when properly and regularly maintained. Indeed, early plans for the Fort envisioned a vigorous campaign of yearly maintenance, itself integrated into the larger educational mission of the site as a means of explaining adobe as a building material to the general public. While we concede that a lack of proper funding has, at times, resulted in deferred or poor maintenance, and has led to the deterioration of building elements, there is no reason to suspect that a properly-funded and maintained Fort would suffer the same fate. Other adobe complexes in Colorado, such as History Colorado’s own Fort Garland, are regularly and successfully maintained and rehabilitated in spite of challenges such as low budgets, harsh weather, and changing trends in museums.

In conclusion, we do concur with NPS’s finding that the reconstructed Bent’s Old Fort is eligible for listing on the National Register of Historic Places.

Thank you for providing the opportunity to comment. If you have any questions, please feel free to contact Joseph Saldibar, Architectural Services Manager at (303) 842-5619 or by email at joseph.saldibar@state.co.us.

Sincerely,

Dr. Holly Kathryn Norton

(for) Dawn DiPrince

State Historic Preservation Officer

Digitally signed by Dr. Holly Kathryn Norton
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