## 1 NAME

| HISTORIC: Bent's Old Fort or Fort William |
| AND/OR COMMON: Bent's Old Fort National Historic Site |

## 2 LOCATION

| STREET & NUMBER: Eight miles east from LaJunta, Colorado to entrance on State Highway 194 |
| CITY, TOWN: La Junta |
| STATE: Colorado |

## 3 CLASSIFICATION

<table>
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<th>OWNERSHIP</th>
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<th>PRESENT USE</th>
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<tr>
<td>—DISTRICT</td>
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<td>X OCCUPIED</td>
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<td>_UNOCCUPIED</td>
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<td>—STRUCTURE</td>
<td>_BOTH</td>
<td>_WORK IN PROGRESS</td>
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<td>ACCESSIBLE</td>
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<td>_YES: UNRESTRICTED</td>
<td>_GOVERNMENT</td>
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<td>_NO</td>
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<td>_MILITARY</td>
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<td>OTHER:</td>
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## 4 AGENCY

Regional Headquarters: National Park Service—Rocky Mountain Regional Office

| STREET & NUMBER: 655 Parfet, Box 25287 |
| CITY, TOWN: Denver |
| STATE: Colorado |

## 5 LOCATION OF LEGAL DESCRIPTION

| COURTHOUSE, REGISTRY OF DEEDS, ETC: Otero County Courthouse |
| STREET & NUMBER: Third Street at Colorado, P.O. Box 511 |
| CITY, TOWN: La Junta |
| STATE: Colorado |

## 6 REPRESENTATION IN EXISTING SURVEYS

| TITLE: List of Classified Structures Inventory, 1976-77 |
| DATE: 1976-77 |
| DEPOSITORY FOR SURVEY RECORDS: National Park Service, Rocky Mountain Regional Office |
| CITY, TOWN: Denver |
| STATE: Colorado |
The Act of June 3, 1960 (16USC 461nt), authorized the establishment of Bent's Old Fort National Historic Site "as a public memorial to commemorate the historic role of such fort in the opening of the West." Approximately 178 acres were acquired under the Act of November 10, 1978 (16USC 1nt.), to protect the integrity of the historic scene. Bent's Old Fort is in Otero County, in southeastern Colorado, 7.5 miles northeast of the town of La Junta, Colorado.

The historic zone within the boundaries of Bent's Old Fort National Historic Site encompasses 178 acres. The remaining area comprising the site, while important for maintaining the site's integrity and the historical scene, is not deemed significant enough to warrant inclusion within the historic zone.

There are two contributing features within the historic zone. The reconstructed adobe fort, the most prominent feature, is a noncontributing structure built during the mid-1970s. It is an important interpretive feature, and does not adversely impact the historic site.

The graveyard, delineated by stones, is a contributing feature. All of the burials, save one, date from the Bent period. The bodies of George and Robert Bent, brothers of William and Charles, were interred here for several months, before being removed for burial in St. Louis. The grave with the tombstone is the only burial to date from a later time. It is the resting place of Edward Dorris, a Civil War soldier who died in 1865.

The stone arch at the old entrance to the park, erected in 1930 by the Daughters of the American Revolution, is a contributing structure. The rubblestone arch is 22' in length and 13'6" in height. In 1984 the Daughters of the American Revolution granite monument, erected in 1912, was relocated under the arch.

The maintenance buildings are noncontributing. These are the modern structures necessary to operate and maintain the historic site, including the maintenance area, visitor contact station, and parking area. Their impact on the historic scene has been minimized by the use of compatible materials and visual buffers.

The area of the race track has never been precisely determined and therefore should be considered a noncontributing feature within the historic zone. The Bent-St. Vrain Company made much use of the facility for sport and entertainment.

Historical Setting

William Bent began constructing Bent's Old Fort sometime in the early 1830s. He built with adobe, both because it was fire resistant and because there was little timber available on the plains. By 1834, the massive fort stood completed amid a virgin prairie of blue grama and buffalo grass.
The fragile prairie ecosystem could not long withstand man's onslaught, however. During peak summer months there could be several thousand people around Bent's Fort. Many had to camp some distance away to find forage for their animals. The ground near the fort was most likely eroded and the dry climate would have prevented rapid regeneration. It is doubtful that much vegetation existed for a mile or two in any direction.

Bent, St. Vrain, and Company reached the height of its influence, both commercially and politically around 1846. Just three years later, the Company's fort lay ruined, abandoned by William Bent and partially destroyed by an explosion and fire.

By 1861, after a decade of disuse, the fort's adobe walls served as a home station and repair shop for the Barlow-Sanderson Overland Mail and Express Company, which ran from Kansas City to Santa Fe. After railroads replaced the stagecoach, the buildings served as cattle corrals, from 1881 to 1884.

Gradually the fort collapsed. Materials were carried away by settlers and ranchers, and the remains deteriorated unchecked. Part of the old walls were still standing as late at 1915. Elsewhere, only mounds outlined the fort's dimensions.

In 1920, after nearly 70 years of disuse, and relentless assault by rain, wind, and hail, the site of Bent's Old Fort was acquired by the Daughters of the American Revolution. In 1921, the "Great Pueblo Flood" crested above the level of the fort grounds, completely the destruction of the adobe structure. For more than thirty years, the Daughters of the American Revolution simply protected the ruins and appropriately marked the site.

The fort's title was transferred to the State of Colorado in 1954, under the care of the State Historical Society. That same year preliminary archeological explorations were undertaken. Bent's Old Fort remained under Colorado's jurisdiction until it was established as a National Historic Site on June 3, 1960. The National Park Service assumed administration of the site in 1963, undertaking a comprehensive archeological study, and in 1975, the reconstruction of Bent's Old Fort began. The dedication ceremony took place the next year, on June 25, 1976.

### Integrity of the Site's Setting Today

Many of the plant species recorded by Lt. John J. Abert on his visit at Bent's Old Fort in 1846-1847 are the same ones found there today. However, while the flat plains surrounding the fort still display stands of blue grama, and a few of the other low-growing plants that were associated with the Bent's time, post-period exotic weeds have encroached upon the land as a result of the natural vegetation being disturbed through cultivation and overgrazing. An environmental management plan is currently being implemented to replace the exotic species of vegetation, primarily tamarisk, with the native varieties of plants. Toward the river, cottonwoods lining the banks of the Arkansas provide a scenic backdrop, and effectively buffer the site from noise generated by U.S. Highway 50 and a nearby railroad. The area is rich in wildlife, and they act as "subtle contributors to the integrity of the historic scene."
Today, very little of the "Great American Desert," upon which Bent's Old Fort was a lone fort, still displays the vast expanses that distinguished the plains as a "barrier as formidable as the mountains." The fort no longer sits amidst virgin prairie, but enough of the region's integrity remains to summon forth an appreciation of the site's historic importance.
SIGNIFICANCE

PERIOD

- PREHISTORIC
- 1400-1499
- 1500-1599
- 1600-1699
- 1700-1799
- 1800-1899
- 1900-

AREAS OF SIGNIFICANCE -- CHECK AND JUSTIFY BELOW

- ARCHEOLOGY-PREHISTORIC
- ARCHEOLOGY-HISTORIC
- AGRICULTURE
- ARCHITECTURE
- ART
- COMMUNICATIONS
- COMMERCE
- COMMUNITY PLANNING
- CONSERVATION
- ECONOMICS
- EDUCATION
- ENGINEERING
- EXPLORATION/SETTLEMENT
- INDUSTRY
- INVENTION
- LANDSCAPE ARCHITECTURE
- LAW
- LITERATURE
- MILITARY
- MUSIC
- PHILOSOPHY
- POLITICS/GOVERNMENT
- RELIGION
- SCIENCE
- SCULPTURE
- SOCIAL/HUMANITARIAN
- THEATER
- TRANSPORTATION
- OTHER (SPECIFY)

SPECIFIC DATES

c. 1833-1849
1930

STATEMENT OF SIGNIFICANCE

Introduction

The site of Bent's Old Fort is of national significance to the history of the United States because of important contributions to the commerce, exploration and settlement, and military conquest of the nineteenth century American west. The stone entrance arch is of local significance under Criteria A for early 20th Century recognition of the importance of the site.

Historical Setting

In 1803 with the purchase of the Louisiana Territory from France, the American Frontier was pushed westward, from the Mississippi River to the Rocky Mountains. One of the earliest and most important developments that occurred in the newly acquired territory was the advent of the fur trade. The mountain men or trappers, along with the early explorers, were among the first white men to appear in the region, and paved the way for subsequent settlement in the American southwest by people of European descent.

In 1821, as the fur trade was gaining strength, Mexico won her independence from Spain. Under Spanish rule, American trade in Mexico had been greatly discouraged. After gaining her freedom, however, Mexico welcomed trade, and many American frontiersmen were eager for the business Mexico could provide.

The Santa Fe Trail, between Independence, Missouri, and Santa Fe, New Mexico, was quickly established as a trade route. Trade was a very lucrative venture, but also at times dangerous, as the barren countryside and hostile Plains Indians presented major difficulties. It soon became evident that those men who would profit most from the new trading opportunities were those who could establish relations not only with the Mexicans, but with the various Indian tribes as well; men such as Charles and William Bent, and Ceran St. Vrain.

The Bent Brothers and Ceran St. Vrain

Charles Bent, born November 11, 1799, in today's West Virginia, was the eldest of Silas and Martha Bent's eleven children. His younger brother, William, was born on the 23rd of May 1809, three years after the family had moved to the fur trade capital of St. Louis. There is little documentation regarding the brothers' early involvement in the fur trade. By the end of the 1820s, however, both Charles and William were experienced trappers, and had traveled extensively on the Santa Fe Trail.

Ceran St. Vrain was born May 5, 1802, in present-day St. Louis, Missouri. St. Vrain worked as a trapping outfitter in St. Louis and later in Taos, New Mexico, during the 1820s.
MAJOR BIBLIOGRAPHICAL REFERENCES

(See continuation sheet)

GEOGRAPHICAL DATA

ACREAGE OF NOMINATED PROPERTY 178

UTM REFERENCES

ZONE EASTING NORTHING
A 13 637 18 0 B 13 637 18 0
C 13 637 18 0 D 13 637 18 0

VERBAL BOUNDARY DESCRIPTION

(See continuation sheet)

LIST ALL STATES AND COUNTIES FOR PROPERTIES OVERLAPPING STATE OR COUNTY BOUNDARIES

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FORM PREPARED BY

NAME / TITLE
Carl McWilliams and Karen Johnson - Interns

ORGANIZATION
National Park Service — Rocky Mountain Regional Office

DATE
April 20, 1984

STREET & NUMBER
655 Parfet Street, POB 25287

TELEPHONE
(303) 236-8675 FTS 776-8675

CITY OR TOWN
Denver

STATE
Colorado 80225-0297

CERTIFICATION OF NOMINATION

STATE HISTORIC PRESERVATION OFFICER RECOMMENDATION

YES X NO __ N/A __

FEDERAL REPRESENTATIVE SIGNATURE

For NPS use only

I HEREBY CERTIFY THAT THIS PROPERTY IS INCLUDED IN THE NATIONAL REGISTER

DATE
May 15, 1984

DIRECTOR, OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION

DATE
2/5/85

KEEPER OF THE NATIONAL REGISTER

DATE
Like the Bent brothers, St. Vrain became an experienced trader on the Santa Fe Trail.

The years in which Charles Bent and Ceran St. Vrain entered partnership and subsequently began building the adobe structure known at Bent's Old Fort have never been ascertained with absolute certainty. Leroy R. Hafen, a noted Colorado Historian, and former executive director of the State Historical Society of Colorado, explains the issue of dating in detail in his article "When was Bent's Fort Built?" As a result of Hafen's work, and of research by other historians, it has been determined that the partnership between Bent and St. Vrain was most likely formed in 1831, and that the fort was constructed sometime between 1832 and 1834. During the winter of 1852-53, William Bent constructed Bent's New Fort a few miles east of the "Old Fort."

Bent's Old Fort, originally named Fort William for William Bent, was built by the Bents and St. Vrain for the purpose of establishing a mercantile trade service with fur trappers, Plains Indians, and the newly independent nation of Mexico. Consequently, this adobe fort became one of the foci where Spanish-American, Anglo-American, and the various Plains Indian cultures, of which the Cheyenne, Kiowa, Arapahoe, and the Comanche were the most prominent, interacted.

The fort was built in a strategic location on the Arkansas River, which, at that time, was the boundary between the United States and Mexico. Bent's Fort was positioned near enough to the southern Rocky Mountains to attract the business of the mountain men, while at the same time it was in a choice location for potential trade with Indians.

Although other trading posts, such as Fort Vasquez and Fort Lupton on the South Platt River, were eventually built as competitors for the lucrative trade, Bent's Old Fort on the Arkansas was unique in its role of bringing diverse cultures together. The fort stimulated the Plains Indians' dependence on manufactured trade items, such as cloth, beads, gunpowder, coffee, Hudson Bay blankets, knives, and tobacco, many of which were shipped from as far away as Europe. For these goods, tanned buffalo hides, skins, and other items were exchanged. The hides were then transported to both Mexican and St. Louis merchants, where they were traded for supplies and money, as well as the trinkets desired by the Indians.

Exploration and Settlement

In its role as a trading post, Bent's Fort played an important part in pushing the American Frontier ever westward. In the process, the fort helped to bring about its own demise as eventually it was no longer on the frontier. The fort was an outpost of civilization and a base of supply for many of the American West's best known personalities, including Kit Carson, John C. Fremont, Col. Stephen Watts Kearny, Thomas Fitzpatrick, and James Beckwourth. Through those persons who visited it, Bent's Old Fort dispersed not only trade goods, but American culture and influence as well. Such influence included the end of Mexican rule in what today is the American Southwest, the displacement of several Indian tribes, and the near extinction of the Bison.
Military

The use of Bent's Old Fort by the military is not only an important chapter in the history of the fort, but in the history of America's westward expansion as well. United States military presence in the region was directed along two main courses, the Plains Indians, and the country of Mexico.

In 1835, the Federal government took advantage of the fort's location to try to improve relations with the Indians. During that summer, Col. Henry Dodge led a contingent of 135 soldiers on an expedition among the Plains Indian people. The purpose of the campaign was to demonstrate American military strength, and to end conflict among the skirmishing tribes. Dodge and his troops met with representatives from various tribes in a large peace council at Bent's Fort on August 11, 1835.

Five years later, in 1840, peace was established between the Cheyenne and Comanche who had long been engaged in hostilities. Bent's Fort, and particularly William Bent, were instrumental in creating the peace. William, who had married a Cheyenne woman who was highly respected by her people, encouraged peace with the Comanche at every opportunity. His intention was to increase the fort's trade by decreasing the hostilities which kept the Indians away. In 1840 the tribes met three miles below the fort on the Arkansas River and established peace. The Federal government took note of the fact that the Indians considered the fort a common meeting ground for peace talks, and as a consequence, in 1846, selected it as headquarters for the Upper Platt and Arkansas Indian Agency.

The fort was perhaps even more significant in its contribution to American military efforts during the war with Mexico. In 1839, when the United States officially recognized Texas as an independent nation, relations with Mexico became increasingly strained. Subsequently after annexing Texas in 1845, the United States formally declared war on Mexico on May 13, 1846. Three years previously, in preparation for a possible war, the Federal government contracted with Bent St. Vrain and Company to provide for the storage of army provisions at the post. Following this, in 1845, two military expeditions led by John C. Fremont, and one expedition led by Stephen Watts Kearny gathered supplies at the fort before continuing on to the southwest.

During the war itself, Bent's Fort served as a military hospital and as a base for the invasion into Mexico by Kearny's Army of the West. William Bent, in addition, served as a scout for Colonel Kearny's troops.

The arrival of the military contributed to the decline of the fort as a trading post. Trade with Mexico was ruined due to the war, and the presence of soldiers kept many Indians away. The soldiers and the large quantities of military supplies took up precious space and disrupted the daily routine.

1 Leroy R. Hafen, "When Was Bent's Fort Built?" Colorado Magazine, April 1954, pp. 105-119.
Prior to 1900, A.E. Reynolds, a Colorado mining magnate, purchased 300 acres including the Bent's Fort site. The Daughters of the American Revolution approached Reynolds in 1912, concerning the placement of a stone marker near the remains of the fort to memorialize its contribution to American history. Reynolds agreed with the recommendation. He had a gray granite marker placed near the remains of the fort. In 1920 the Otero County Chapter of the Daughters of the American Revolution received title to the land from Reynolds' daughter. The deed was recorded in 1926. In 1930 the Daughters of the American Revolution erected the stone arch. The arch has local significance under Criteria A because it reflects the concern, appreciation, and recognition by a local group of the significance of Bent's Fort to American history.

The nomination of this historic site did not consider significance under Criteria D. We do not consider the dumps created by the archeological investigations prior to construction of the fort to be important. A surface survey was conducted within the boundaries and no significant cultural material was found. A separate nomination for archeological resources will be prepared if any further investigation reveals significant resources.
**NATIONAL REGISTER OF HISTORIC PLACES INVENTORY -- NOMINATION FORM**

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**MAJOR CONTINUATION SHEET REFERENCES**

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<td>National Park Service, Midwest Regional Office.</td>
<td>n.d.</td>
<td>&quot;Historical Synopsis.&quot; (Bent's Old Fort National Historic Site.)</td>
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The nomination follows the original boundaries of Bent's Old Fort National Historic Site as established by Congress in 1960. The boundary begins at Point A which is situated next to State Highway 194 approximately 200 feet west of the west corner of the maintenance building. The line proceeds 200 feet southeast to Point B which is its intersection with the maintenance road. From Point B the line proceeds south along the maintenance road until it intersects with the Arkansas River 2600 feet from Point B. From Point C the line follows the meanderings of the Arkansas River for approximately 7000 feet (2500 feet in an easterly direction and 3500 feet in a northerly direction) to Point D which is where the river once again heads eastward. Point D is 200 feet south of State Highway 194. From Point D the boundary proceeds southwest for 2800 feet paralleling State Highway 194 until its intersection with Point A.
NAME: Terrain surrounding Bent's Old Fort
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, Colorado
VIEW: To south of surrounding vegetation and terrain. Fort in background
PHOTO NUMBER: 1
NAME: Fort and Surrounding Terrain
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To north
PHOTO NUMBER: 2
NAME: Fort and Surrounding Terrain
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To north
PHOTO NUMBER: 3
NAME: Bent's Old Fort
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To southeast, showing part of racetrack
PHOTO NUMBER: 4
NAME: Bent's Old Fort
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To south of front -- north side of fort
PHOTO NUMBER: 5
NAME: Bent's Old Fort
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To southwest
PHOTO NUMBER: 6
NAME: Bent's Old Fort
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service Denver, Colorado
VIEW: To west
PHOTO NUMBER: 7
NAME: Interior of Bent's Old Fort
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, Colorado
VIEW: To north
PHOTO NUMBER: 8
NAME: Bent's Old Fort and Cemetery
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, Colorado
VIEW: To southeast
PHOTO NUMBER: 9
NAME: Cemetery
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, Colorado
VIEW: To southeast
PHOTO NUMBER: 10
NAME: Bent's Old Fort Cemetery
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: Of grave of Edward Dorris to northwest
PHOTO NUMBER: 11
NAME: View of surrounding terrain
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: North from fort
PHOTO NUMBER: 12
NAME: Fort and surrounding terrain
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: West of fort
PHOTO NUMBER: 13
NAME: Arkansas River
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: South of river
PHOTO NUMBER: 14
NAME: Arkansas River
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: Southeast of river
PHOTO NUMBER: 15
NAME: Maintenance area
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To northwest
PHOTO NUMBER: 16
NAME: Maintenance area
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To south
PHOTO NUMBER: 17
NAME: Visitor Contact Station
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service Denver, Colorado
VIEW: To northeast
PHOTO NUMBER: 18
NAME: Visitor Contact Station
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To east
PHOTO NUMBER: 19
NAME: Visitor Contact Station
LOCATION: Bent's Old Fort National Historic Site, Colorado
PHOTOGRAPHER: Carl W. McWilliams
DATE: November 1983
LOCATION OF NEGATIVE: Rocky Mountain Regional Office, National Park Service, Denver, CO
VIEW: To northeast
PHOTO NUMBER: 20