

**American Flat Mill Safety Hazard Abatement
Environmental Assessment**

Scoping Report

August 16, 2010

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Acronyms

AFM	American Flat Mill
BLM	U.S. Bureau of Land Management
DOI	U.S. Department of the Interior
EA	Environmental Assessment
EIS	Environmental Impact Statement
FR	Federal Register
NEPA	National Environmental Policy Act
NOI	Notice of Intent
SFFO	Sierra Front Field Office

1.0 Introduction

The US Department of the Interior (DOI), Bureau of Land Management's (BLM's) Sierra Front Field Office (SFFO), is preparing an Environmental Assessment (EA) (to evaluate the impacts to the natural and human environment from a proposed action to mitigate hazards to human health from the American Flat Mill (AFM)).

The National Environmental Policy Act (NEPA) requires that Federal agencies hold an open and early process for determining the scope of issues to be addressed in an EA, to identify the significant issues that could be associated with the proposed action. This report summarizes the comments received by the BLM during the scoping period.

1.1 Description of the American Flat Mill

The AFM is located in Storey County, southwestern Nevada as shown on Figure 1. The site is located within the northeast quarter of Section 7, Township 16 North, Range 21 East, of the Mt. Diablo Meridian, Storey County, Nevada. The site is located approximately 1.25 miles northwest of Silver City, Nevada, and 12 road miles northeast of Carson City, Nevada. The site is approximately 7 acres in size and consists of 8 buildings and associated materials (USACE 2010).

The AMF (the United Comstock Merger Mill) was built in 1922 to process local gold and silver ore utilizing cyanide solution and Merrill-Crowe process (a separation technique for removing gold from a cyanide solution). The mill operated from 1922 to about 1926 and produced \$7.5 million worth of silver and gold. Over its short life the mill was owned by two different corporate entities, the United Comstock Mines and the Comstock Merger Mines. At the time it operated, AFM was considered the largest, most modern and sophisticated mill of its type in the U.S. The mill was shut down due to metallurgical problems and the dropping price of silver. When the site was closed all equipment, metal, and wood materials were scrapped and salvaged. During the salvaging process little care was taken in the removal of equipment and other materials and concrete structural components were cut and broken as required to facilitate the removal process. This salvage process resulted in a great deal of damage including large holes/void left in the concrete, cut reinforcing steel, and broken concrete structural members. This along with years on decay and vandalism has taken a toll of the once impressive structures (USACE 2010).

Today the existing structures of the site consist of badly decaying concrete, exposed reinforcing steel, broken structural members, and large holes in the concrete floors leaving only the deteriorated concrete skeletons of the structures remaining. Beginning in 1998, the mill site has repeatedly been fenced, gated, signed, and access roads scarified for public safety reasons. In response to a fatality at the site, the BLM officially closed the property to public entry in February 1997. Even with the closure, the site receives an estimated sixty visitors a week, mainly juveniles who climb on the structures to post graffiti and hold parties. According to the Storey Co. Sheriff's Department, police officers and emergency vehicles respond to issues associated with the site several times a month (USACE 2010).

2.0 The Scoping Process

The BLM SFFO has completed the scoping process to determine the relevant issues that will influence the scope of the environmental analysis and alternatives that will be analyzed in the American Flat Mill Hazard Abatement EA. Scoping is conducted in the early phase of the NEPA planning process and is used to determine the breadth and depth of the EA. The SFFO will use the comments received during the scoping period to determine:

- Significant issues to be addressed;
- Depth of the analysis;
- Alternatives to be assessed; and
- Potential environmental and socioeconomic effects of the various alternatives.

The formal scoping period began on April 27, 2010. Written comments on the proposed RMPA/EA were accepted through May 27, 2010.

During the scoping period, the SFFO held two public scoping meetings in Nevada as shown in Table 1.

Table 1 Public Scoping Meetings		
Town	Date	Location
Carson City	Tuesday, April 27, 2010	BLM Carson City District Office
Virginia City	Wednesday, April 28, 2010	Storey County Senior Citizens Center

The informal format of the scoping meetings allowed meeting participants to review displays, maps, and literature and to meet members of the EA project team, agency staff, and contractors to discuss the project. Repositories were provided to receive written comments. Approximately 13 people attended the meeting in Carson City and 8 people in Virginia City. These estimates are approximate because not all participants who attended the meetings signed-in.

In addition to the public scoping meetings, scoping activities included:

- Publishing press releases regarding public scoping and the public scoping meetings in the Record Courier;
- Mailing the scoping news release to interested parties including: landowners; conservation organizations; Storey County, and the State of Nevada.
- Posting information about the site and the scoping meetings on the BLM’s SFFO website http://www.blm.gov/nv/st/en/fo/carson_city_field/blm_information/nepa/comstock_merger_mill.html.

Public scoping documents are included in Appendix A.

2.1 Cooperating Agencies

Cooperating agencies formally contacted during the scoping process included:

- Nevada State Historic Preservation Office (SHPO)

- Comstock Historic District Commission (CHDC),
- Storey County,
- State of Nevada, Division of Minerals,
- Bureau of Corrective Actions, Nevada Division of Environmental Protection,
- Nevada Commission for the Reconstruction of the V&T Railroad.

2.2 Collaboration With Tribes

Tribes formally contacted during the public scoping process included: the Yerington Paiute Tribe and the Washoe Tribe of Nevada and California.

3.0 Scoping Issue Summary

All public documents were compiled in a database for analysis. A total of 22 formal comments were received during the public scoping period. These comments and the BLM response are shown in Appendix B. Table 2 provides a summary of comments received:

Organization Type	Number of Comments	Name/Title
Agency	1	Advisory Council on Historic Preservation
Private Citizen	21	Unique Comments

The majority of the unique comments received are in favor of retaining the historical significance of the AFM; however, there was also support for demolishing the site. The primary issues identified were historic preservation, access to recreation, and safety. Specific issues identified include:

- The community enjoys going to the site;
- Artistic nature of the graffiti;
- The importance of the AFM to the history of Storey County;
- The danger that the site poses to visitors; and
- Providing secure fencing and other security at the site;

Several responses suggested alternatives, including:

- Making the site a recreational site;
- Turning the site into a State Park; and
- Publish a booklet of the history and a pictorial record of the site

Appendix A – Public Scoping Documents

**Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office**

Circle meeting attended: Carson City – Virginia City

Name: B. Bane

Affiliation (if applicable): Carson City resident, VC visitor

Email: [REDACTED]

Address: _____

Would you like to be on the American Flat Mill mailing list? Y or (circle answer)

BLM is seeking information about the American Flat Mill site and is requesting public comments/concerns to help develop alternative approaches to abate public safety hazards at the site.

Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

I suggest the Demolition Alternative for the following reasons:

1) 24 hr monitoring and security guard service doesn't seem realistic over the long haul. What happens a decade from now if budget cuts force the curtailment of monitoring? Then we have the same problem as now - an open attractive nuisance

2) Stabilization alternative is way more expensive and leaves only a few ramped up low walls to look at. The weird

(additional space on back of sheet)

Completed comment forms may be submitted at the public meetings or mailed to:

BLM Carson City District, Sierra Front Field Office

Attn: Dan Jacquet

5665 Morgan Mill Road

Carson City, Nevada 89703

Comments may also be submitted electronically via: AmericanFlat_EA@blm.gov

Beauty of this place is the large industrial spaces & voids. Those big walls and voids will either be off limits or lowered to nothing under any of the alternatives, so we might as well just demo it all, make an open space, and save some money that might go somewhere (not here?) for other worthy projects.

In other words, it's doomed, so why not do it in a big way?

PS What about a big implosion party?
One last big blow out here.

**Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office**

Circle meeting attended: Carson City - Virginia City

Name: Judie Fisher - Crowley

Affiliation (if applicable): _____

Email: [REDACTED]

Address: [REDACTED]

Would you like to be on the American Flat Mill mailing list? Y or N (circle answer)

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Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

American Flat Cyanide mill is a piece of mining history. at one time there was legislation to make American Flat the Nev. State Capital. the mill is also the only cement cyanide mill in the country.

Another important factor of the mill is the graffiti art, which dates back to the 30's.

I would recommend we make this into a State Park maybe using Super-fund money. I believe we could receive Senator Reid's support. Nevada can not afford to lose any more of its history.
one

(additional space on back of sheet)

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Attn: Dan Jacquet

5665 Morgan Mill Road

Carson City, Nevada 89703

Comments may also be submitted electronically via: AmericanFlat_EA@blm.gov

I would gladly help in any way to make this
a Park.

Thank you.

Frenchu_4-21-10.txt

From: Richards, William [REDACTED]
Sent: Friday, April 23, 2010 11:54 AM
To: Maureen Oshea-Stone
Subject: FW: Comstock Merger Mill at American Flat - Environmental Assessment 2010

-----Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Wednesday, April 21, 2010 1:39 PM
To: [REDACTED]
Subject: Re: Comstock Merger Mill at American Flat - Environmental Assessment 2010

Thank you Mr. Frenchu for your detailed comments. We will consider them in our scoping process and keep you apprised of the next steps.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

Robert Frenchu

[REDACTED]

[REDACTED]

To

Daniel_Jacquet@blm.gov

cc

04/21/2010 12:43

PM

Subject

Comstock Merger Mill at American

Please respond to

Flat - Environmental Assessment

[REDACTED]

[REDACTED]

[REDACTED]

Page 1

This is in response to a request for comments regarding the mill site at American Flat.

I'd like to see the site saved, if possible. I agree that it is historically significant, although the vandals have reduced its significance somewhat. With that in mind, I would like to see the issue handled (in order of preference from most desirable to least desirable and probably cost) thus:

1. FENCE, PERMIT SYSTEM, AND WARNING SIGNS

Place warning and informational signs* and fence around the area advising visitors that they need to have a permit from the BLM to enter; otherwise, no trespassing. Issuance of the permit would enable BLM to advise visitors of the various hazards, sign a waiver, and maybe even collect a little money. Probably won't go over very well with BLM due to extra work involved, liability, etc.

2. FENCE, WARNING SIGNS, AND SITE SECURITY

Place warning and information signs and fence around the IMMEDIATE area (i.e. the large mill building itself) advising visitors that the area is dangerous and that trespassers will be prosecuted. Don't know what "site security" might be if it's not fences, though. Laser beams and web cams?

3. REMEDIATION OF HAZARDOUS AREAS ONLY

Probably impossible to do

4. DEMOLITION

* Mentioning that it was a cyanide mill might be enough to scare off many visitors.

I will say that the only way to prevent idiots from hurting themselves is to remove the mill entirely, scrape the site clean, and plant nice, soft grass. As long as you have someone dumb enough to try to climb the stairs on an ATV (OIG-AML Report 7-08.pdf) there will be injuries which no amount of fencing, signs, guard dogs, or fines will prevent.

Being somewhat interested in Nevada mining history myself, I have visited the site on a few enjoyable occasions, and emerged unscathed, probably because I didn't go anywhere it was obviously unsafe. In fact, I have traveled many thousands of miles throughout the Nevada outback, encountering many abandoned mines, mill sites, and other potentially dangerous places. I easily eluded Death's clutches by observing warning signs, using common sense, and respecting other people's property rights.

I really dislike the idea of destroying the site because of a few morons who are too stupid to not see the potential dangers of riding an ATV up the stairs. I've always thought that educating people is better than trying to prevent everyone from hurting

Frenchu_4-21-10.txt

themselves. The theories of Darwin come to mind, although it might end the career of any BLM employee who mentioned it.

But, if you decide to blow it up, let us all know when, because I'd like to film it.

Kind regards,

Robert Frenchu



Hopkins_4-19-10.txt

From: Richards, William [REDACTED]
Sent: Friday, April 23, 2010 11:54 AM
To: Maureen Oshea-Stone
Subject: FW: Long Live The Mill

-----Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Wednesday, April 21, 2010 1:44 PM
To: [REDACTED]
Subject: Re: Long Live The Mill

Thank you for your detailed comments. We will consider your comments in the scoping process and keep you apprised of the next steps.

[REDACTED]
[REDACTED]

To: 04/19/2010 09:04 AM
cc: AmericanFlat_EA@blm.gov
Subject: Long Live The Mill

My family and I love driving out to the old mill every few months to check out the new graffiti and just walk around the ruins.

Each time we go, we go with camera's in hand and spend a few hours just taking photographs. We always knew someday someone would want to take this away and I'm asking the BLM to leave it in alone.

Yes, it can be dangerous walking around and it does require one to be cautious. But it's no more dangerous than hiking a narrow mountain trail, or jumping a sandrail off the saddle at Sand Mountain. How many people have been killed riding ATV's? How many people have been killed skiing? How many people have drowned in Lake Tahoe or Pyramid Lake? There are inherent

Hopkins_4-19-10.txt

hazards in this world, one must choose the risks he takes.

Please leave this relic for those of us who enjoy the history of our area.

Feel free to place warning signs, and historical markers and remove debris but leave the mill as a historical place for our families to continue to enjoy.

Brigitta Hopkins

**Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office**

Circle meeting attended: Carson City – Virginia City

Name: JA JARO

Affiliation (if applicable): _____

Email: _____

Address: _____

Would you like to be on the American Flat Mill mailing list? Y or N (circle answer)

BLM is seeking information about the American Flat Mill site and is requesting public comments/concerns to help develop alternative approaches to abate public safety hazards at the site.

Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

EITHER OPTION #1 DO NOTHING

OR
OPTION FOR INSTITUTIONAL CONTROL

(additional space on back of sheet)

Completed comment forms may be submitted at the public meetings or mailed to:
BLM Carson City District, Sierra Front Field Office
Attn: Dan Jacquet
5665 Morgan Mill Road
Carson City, Nevada 89703

Comments may also be submitted electronically via: AmericanFlat_EA@blm.gov

Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office

Circle meeting attended: Carson City – Virginia City

Name: LARRY PRATER

Affiliation (if applicable): STOREY CO. PLANNING COMMISSION

Email: [REDACTED]

Address: [REDACTED]

Would you like to be on the American Flat Mill mailing list? Y or N (circle answer)

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Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

I FEEL STRONGLY THAT THE MILL IS AN HISTORICAL ASSET TO THE COMSTOCK MINING DISTRICT, AND SHOULD BE PRESERVED AS MUCH AS POSSIBLE. IT IS VERY VISIBLE FROM THE NEWLY RESTORED V & T RAILWAY, AND SHOULD BE PRESERVED AS AN ASSET TO THAT ENTERPRISE, ALSO.

(additional space on back of sheet)

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Carson City, Nevada 89703

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Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office

Circle meeting attended: Carson City – Virginia City

Name: Alan Preissler

Affiliation (if applicable): —

Email: [REDACTED]

Address: [REDACTED]

Would you like to be on the American Flat Mill mailing list? Y or N (circle answer)

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Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

Fence off the hazardous parts of the mill site.

1. This option would be probably the least expensive option; the cost saved vs. ~~and~~ any destructive measures would pay for the fence's maintenance for probably decades.

2. The mill and its historical and cultural significance is preserved.

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Attn: Dan Jacquet

5665 Morgan Mill Road

Carson City, Nevada 89703

Comments may also be submitted electronically via: AmericanFlat_EA@blm.gov

Waclo_4-22-10.txt

From: [REDACTED]
Sent: Friday, April 23, 2010 11:54 AM
To: Maureen Oshea-Stone
Subject: FW: U. C. Merger Mill / American Flat

-----Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Thursday, April 22, 2010 7:47 AM
To: Steve & Zita Waclo
Subject: Re: U. C. Merger Mill / American Flat

Thank you for your detailed comments. We will consider your comments in the scoping process and keep you apprised of the next steps

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Daniel_Jacquet@blm.gov

cc

04/22/2010 02:12

Subject

AM

U. C. Merger Mill / American Flat

From: [REDACTED]
Subject: U. C. Merger Mill /American Flat
To: AmericanFlat_EA@blm.gov
Cc: [REDACTED]
Date: Thursday, April 22, 2010, 2:09 AM

Hello:

Thanks for providing an opportunity to comment on disposition of United Comstock Merger Mill at American Flat.

The closest I've been to the Mill is when it was pointed out to me by our leader as we hiked along the V&T tracks from Virginia City to Moundhouse. I'm not an attorney, but I believe the legal term for the complex may be "attractive nuisance" and, as stated in the media release, it's continued existence almost certainly places the US Government in a position of having to defend itself (malfeasance?) for allowing the continued presence of what by all accounts is a good place to visit if you want to become seriously messed up... or dead.

I don't agree with the description of the structure being "responsible for a death", any more than any inanimate object can be responsible for anything.

That being said, efforts to restrict access through a variety of means have apparently been unsuccessful, and I suspect determined trespassers, eager to prove Darwin correct, will always stay one step ahead of any future efforts to secure the area. Short of 24/7 patrols, or other extremely expensive measures, I doubt it is possible to completely eliminate visitors.

Historical significance has been mentioned as a justification for maintaining the facility, and while I grudgingly concede the point, I believe a comprehensive digital photographic record would suffice to memorialize the facility for posterity (perhaps the graffiti could be photo-shopped). Maybe a nice plaque at the site, as well.

Frankly, as I travel through the Comstock, I can't help notice what a fine mess past generations have made of the area (although the current generation appears to be determined to do their part as well), and I see this Mill as just another monument to short-sighted business interests that despoiled the area and moved on, leaving the detritus of their efforts for future generations to ponder, and ultimately, deal with. There are more than enough structures littering the landscape that provide only minimal opportunities for careless people to injure themselves and I believe those artifacts should provide ample remembrance of the way things used to be.

I vote for having the place declared a Superfund site (lots of mercury and cyanide about, I'm sure) and demolished...short term expensive; long term, a bargain.

And don't forget the plaque...something bronze on a short pedestal might be appropriate.

Again, thanks for the opportunity to comment.

Steve Wacl o
Carson Ci ty

Waclo_4-22-10.txt

**Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office**

Circle meeting attended: Carson City – Virginia City

Name: Mathew Stearns

Affiliation (if applicable): Northern Nevada Paintball Association

Email: [REDACTED]

Address: [REDACTED]

Would you like to be on the American Flat Mill mailing list? Y or N (circle answer)

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Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

all the buildings need the vaults and tunnels filled for safety. In addition the rebar needs to be cut out and any other holes could be covered with a mesh or sheet metal. Once this is done the area could be opened for recreational use w/ a permit to recoup the cost along w/ fines for litter and defacement. With a road for better access, law enforcement would have better access and ability to enforce the permits and or fines.

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Attn: Dan Jacquet

5665 Morgan Mill Road

Carson City, Nevada 89703

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Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office

Circle meeting attended: Carson City → Virginia City

Name: DALE VERNER

Affiliation (if applicable): _____

Email: _____

Address: _____

Would you like to be on the American Flat Mill mailing list? Y or N (circle answer)

BLM is seeking information about the American Flat Mill site and is requesting public comments/concerns to help develop alternative approaches to abate public safety hazards at the site.

Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

- ① Please try to save or record the many artistic efforts throughout the structure.
- ② If there was any money available, tours would be helpful.
- ③ Would you please publish a booklet of the history and pictorial record of the site?
- ④ Thank you for having the meeting. The speakers were very helpful and instructive.

(additional space on back of sheet)

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BLM Carson City District, Sierra Front Field Office
Attn: Dan Jacquet
5665 Morgan Mill Road
Carson City, Nevada 89703

Comments may also be submitted electronically via: AmericanFlat_EA@blm.gov

**Scoping Comments On Proposal to Abate Public Safety Hazards
American Flat Mill, Storey County, Nevada
BLM Carson City District – Sierra Front Field Office**

Circle meeting attended: Carson City – Virginia City

Name: Keith Work

Affiliation (if applicable): /

Email: /

Address: [REDACTED]

Would you like to be on the American Flat Mill mailing list? Y or N (circle answer)

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Useful comments are those that are specific, identify alternatives, and/or inform the scope of possible alternatives.

Institutional Controls Alternative is my preference
- to preserve history - Local taxpayers and state/federal gov't.
decided to spend money to support re-construction of the
U&T railway - - seeing the mill structures is part of the history
to be viewed from the train ride.
Public safety may be desired, but it cannot be guaranteed.
Determined persons will avoid protective and security measures.
All safety hazards can never be removed, which applies to all
BLM property.
Please remember the old U&T RR engine house in Carson - - torn
down when it became inconvenient to have it sitting empty. People
come to the area to visit and see old buildings, not pictures of them.

(additional space on back of sheet)

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Attn: Dan Jacquet
5665 Morgan Mill Road
Carson City, Nevada 89703

Comments may also be submitted electronically via: AmericanFlat_EA@blm.gov

**SCOPING COMMENTS ON PROPOSAL TO ABATE PUBLIC SAFETY HAZARDS
AMERICAN FLAT MILL, STOREY COUNTY, NEVADA**

April 29, 2010

TO:

Daniel L. Jacquet, Community Liaison, Bureau of Land Management

5665 Morgan Mill Road, Carson City, Nevada 89703

AmericanFlat_EA@blm.gov

FROM:

Joseph L. Curtis, [REDACTED]

Director, Storey County Emergency Management, Virginia City, NV 89440

Chair, Storey County Local Emergency Planning Committee

Owner, Mark Twain Bookstore, Virginia City, Nevada

Historian of the Comstock area

Author: *American Flat, Stepchild of the Comstock*

Vice Chair, Comstock Historic District Commission Board

Former member (15 years) Virginia City Convention and Tourism Authority

Chief, Virginia City District, Storey County Volunteer Fire Department

Chair, Storey County Board of Equalization

Family businesses for the past 51 years in Virginia City

Retired (1995), Carson City Sheriff's Department (Assistant Sheriff) 20 years

CONCERNS:

My primary concern is that decisions have already been made or ordered within the Bureau of Land Management (BLM) at high levels to raze the entire structure and the history be damned. Further, that the comments made by the public are of little importance or impact to the goals of the federal Inspector General's Office and the high level orders of the BLM.

Since this meeting in Virginia City I have heard on the news (Reno TV) that the BLM plans to demo the structure entirely. I have also heard it while on the V&T RR train on 4-29-10 during a special ride it was so announced. I have heard it from the County offices as well.

So, did I waste my time going to this meeting? Are those of us that care about the history just whistling in the wind? Is BLM going to disregard public concerns regardless? Is more our history going to disappear without regard to maintain historical fabric so as to provide support for the tourism economy upon which Virginia City exists?

OBSERVATIONS AND STATEMENT OF THE RECOGNIZED PROBLEM:

The Comstock Merger Mill, commonly known as the "American Flat Mill" is a **genuine historical structure** located well within the confines of the Comstock Historic District. This is well established via BLM's own documents as presented at the public meeting of April 28, 2010 in Virginia City. This historical mill, during its short period of operation, had local, state, national and international impact pursuant to its processing of both silver and gold ores from the Comstock Lode.

Over the last thirty plus years I have witnessed the gradual natural decay as well as the intentional destruction of many historical structures, artifacts and icons of the magnificent history of the Comstock Lode, the birthplace of the great State of Nevada. If there is a way to sanitize an historical structure to such a point that it is safe to be around and does not pose a potential danger to the public then such should be done so as to preserve as much of the historical fabric of the Historic District as possible for the future generations.

The BLM has a responsibility, duty, and an inherent task to do just that and has, in the past been quite successful and effective in doing so to the point of commendation.

It is recognized that all such projects require funding and that poses problems. However, if funding is available for demolition (which is not cheap), then funding should be available (or able to be diverted) for the sanitizing and protection of this historical structure.

While I wholly support and defend the need to save some portions of the structure for its historical relevance, I can authoritatively speak to the historical dangers of the structure over the past 30 or more years. I have personally responded to untold numbers of injured persons, stabbings, shootings, bonfires, abandoned and stolen vehicles, vehicle fires, fights, juvenile drinking parties, wild-land fires and fatalities occurring at the site. Para-military enactors and re-enactors, paint ball players, graffiti artists and others bent on vandalizing or disrespecting

the facility are common to the site. However, also common to the site are history enthusiasts, researchers, authors, tourists, outdoor enthusiasts, hunters, ATV and motorcycle riders, hikers, bicyclists, walkers, site seers, family outings and the like that respect and enjoy the structure for its historical significance. This activity, legal, illegal, improper and proper, impacts both local Law Enforcement and Fire/EMS within the county for which BLM provides no assistance in mitigating. Granted, BLM is not afforded the needed law enforcement personnel and equipment necessary to deal with the matters that are left to the locals.

These incidents alone, **do not** cry out for destruction of the structure or the general historical site. They merely bring to the forefront the need to **clean the place up, properly and effectively limit access thereto and preserve and interpret the location as the historical structure that it is**. An on-site watchman or caretaker is necessary to protect BLM's interests and had such been placed on-site many years ago, the money used to do these hazard studies and potentially contract the demolition of the site would have been much more effectively and intelligently used and we would have a wonderful historical resource site to this day and into the future.

The structure has visual historical significance to the outdoor people, people on the train and others. It must be preserved for those people. This is not just some old concrete structure that with its disappearance nothing will be missed. It will be missed. It is part of the visual historical impact that must be preserved to some degree. If we take out all these aged and deteriorated structures then we will have nothing to show the public as to the history of the area. Since 1900 the structures, equipment, artifacts and materials have been leaving the Comstock for various reasons leaving us with very little to illustrate this national historic district.

MY SOLUTION:

Instead of razing the entire structure, core areas should be saved for their historical significance. The dollars committed to a potential razing should be redirected to preservation and interpretation. BLM should do a solid cost benefit analysis as to demolition and removal versus sanitizing and interpreting. I would bet you lunch the cost of clean-up and preservation (arrested decay) and interpretation would far less expensive. Refer to your cost/benefit analysis of the matter.

There is a lot of hanging and displaced concrete, rebar and other materials that will have to be removed from the site to make it safe. Holes will have to be covered over or filled in with concrete. Certain accesses will have to be covered over to prevent access. Access to unsafe areas will have to be closed off. Certain buildings and structures will have to be razed, but not all of them.

However core structures need to be saved for visual historical value and fenced off with 12 foot fences. An interpretive center, kiosk, or other structure should be put together to provide for historical interpretation. You would probably spend less money doing this than the razing

process where you will have to contract with a demolition outfit, then haul away the remains and pay to dump the residue in a landfill. Use those dollars more wisely.

I personally would be willing to assist in the interpretive work.

CONSIDERATIONS:

Don't remove the history, sanitize it and interpret it for the public. Use your dollars wisely. Removal of Nevada's historical fabric benefits no-one and denies future generations the ability to enjoy and appreciate the history of the Comstock Lode, once known as "*The Richest Place on Earth.*"

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Fri 5/21/2010 6:48 PM
To: Terri Sutor
Cc: Maureen Oshea-Stone
Subject: Re: American Flat concrete structure

Thanks for your comment. We are developing our alternatives for analysis at this time. We will keep you informed of our progress. Thanks.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

"Terri Sutor" [REDACTED]
To "Daniel Jacquet"
05/21/2010 05:02
<Daniel_Jacquet@blm.gov>
PM
cc
Subject
American Flat concrete structure

Dear Mr. Jacquet,

I'm sending this message to voice my opinion as to what should happen to the unique mining mill structure in the American Flat area. Please, leave it as is!!! It's such an interesting enigma and should be preserved since I've been told that it is the largest construction of concrete in the U.S. My only suggestion is to post some signage indicating the history of the structure which would enlighten the public who come across it. Otherwise, let it stand!

Sincerely,

Terri Sutor
Minden, NV

-----Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Monday, May 24, 2010 10:16 AM
To: Eileen Angelucci
Cc: Maureen Oshea-Stone
Subject: Re: American Flat mining structure

Thank you for your comment. We will keep you informed of our progress.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

Eileen Angelucci [REDACTED]
To: <daniel_jacquet@blm.gov>
05/22/2010 11:13AM
Subject
American Flat mining structure

I have been following the proceedings regarding options for the mining mill structure in American Flat in the Comstock. I would like to voice my opinion that the structure should be left as is. It is part of our heritage and can be seen from the V&T. It would be a shame to see this go.

Thanks.

Eileen
[REDACTED]

Hotmail is redefining busy with tools for the New Busy. Get more from your inbox. See how.

Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Monday, May 24, 2010 10:12 AM
To: [REDACTED]
Cc: Maureen Oshea-Stone
Subject: Re: American Flat - United Comstock Merger Mill

Thank you for your comment. We will keep you informed of our progress.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

[REDACTED]
To Daniel_jacquet@blm.gov
05/21/2010 06:48 PM
cc
Subject American Flat - United Comstock Merger Mill

Mr. Jacquet: I believe that the mill structures at American Flat should be preserved. True, the site can be termed an 'attractive nuisance,' but then so could El Capitan for BASE jumpers - Yellowstone abounds with many dangerous spots - People need to take some responsibility for themselves - ALL of the country can not, and should not become a 'Disneyland'

This is part of 'our' local history, and needs to be preserved for future generations.

Sincerely

T A Taro

Who dares, wins

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Monday, May 24, 2010 10:14 AM
To: [REDACTED]
Cc: Maureen Oshea-Stone
Subject: Re: United Comstock Merger Mill at American Flat.

Thank you for your comments. We will keep you informed of our progress.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

[REDACTED]
05/22/2010 02:55 AM
To Daniel_jacquet@blm.gov
cc
Subject United Comstock Merger Mill at American Flat.

Saturday, May 22nd, 2010

Dear Daniel Jacque

The United Comstock Merger Mill at American Flat should be FLATTENED
to the GROUND.

A specialist Earthquake Engineer once stated that:

" Any Structure designed before 1973, or, that was built before 1976, has little or no earthquake design built into it. "

The above statement would make the United Comstock Merger Mill a very dangerous structure that could not survive a significant Earthquake.

If you want more proof of this, scratch the surface of the concrete with a hard steel nail or with a hardened spike or screwdriver.

If the concrete falls away like sand, this is an even more dangerous structure.

Good concrete should be GLASS Hard and Steel-Like Solid and the steel nail should not penetrate below the surface of the concrete.

Core Samples can also be taken and analyzed.

A Civil Engineer can confirm this.

If so, demolish the United Comstock Merger Mill at American Flat.

██████████ █████

Norman . Dumont

Definition of:

Analyze - Analysis is the process of breaking a complex substance into smaller parts to gain a better understanding of it.

Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Wednesday, May 26, 2010 9:52 AM
To: Dan Zampirro
Cc: Maureen Oshea-Stone
Subject: Re: Merger Mill

Thank you for your thoughtful comments. We will keep you informed of our progress. Thanks.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

Dan Zampirro [REDACTED]
To "'daniel_jacquet@blm.gov'"<daniel_jacquet@blm.gov>
05/25/2010 04:45 PM
cc
Subject Merger Mill

Dear Mr. Jacquet,

It is my belief the mill should remain as it is. I dislike the graffiti and abuse to the structure, but it is very significant in its historical presence on the Comstock in American Flat. If a few people have been injured and one died there in 20 years, that is unfortunate. However, for the number of visitors to the site in that many years, these are not such bad statistics. Being out on the highway is probably less safe. It would cost the government(s) a small fortune to tear that structure down and haul it away, creating an environmental mess/headache. It is fine as it is, no need to recreate the wheel there. Same with the Carson River/mercury issue.

Thanks

Danny Zampirro

Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Friday, May 28, 2010 10:00 AM
To: Mr Leon Henifin
Cc: Maureen Oshea-Stone
Subject: Re: American Flats

Thank you for your comments. We will keep you informed of our progress.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

Mr Leon Henifin [REDACTED]
To Daniel_jacquet@blm.gov
05/27/2010 05:23 PM
Subject American Flats

My Son in law just had to take us to American Flats. I agree that this place is a huge government liability. Not only is the place dangerous with all the holes and deteriorating concrete, but you can tell there is all kinds of activities going on there. Shotgun shells, spay cans, peoples clothes, and I even found a 45 bullet. I heard that there were witchcraft sacrifices going on there. It should be dynamited and demolished. If not, it would make a good military training facility.

It should be fenced off and the road made impassable.

(See attached file: april may 067.JPG)



Preserving America's Heritage

June 2, 2010

Ms. Linda J. Kelly
Field Manager
Sierra Front Field Office
Bureau of Land Management
5665 Morgan Mill Road
Carson City, NV 89701-1448

**Ref: *Comstock Merger Mill at American Flat
Virginia City, Nevada***

Dear Ms. Kelly:

On May 14, 2010, the Advisory Council on Historic Preservation (ACHP) received the Bureau of Land Management (BLM) letter for the referenced undertaking, requesting our comments pursuant to the National Environmental Policy Act of 1969 (NEPA). We have no comments pursuant to NEPA at this time.

We appreciate the early acknowledgement in the documentation you provided that the proposed undertaking will adversely affect historic properties. We request formal notification of adverse effects once they have been determined, as required under our regulations, "Protection of Historic Properties" (36 CFR Part 800). Please provide the required notification and documentation to the ACHP in accordance with 36 CFR § 800.6 and § 800.11(e). At that time we will make a determination as to whether we will participate in the Section 106 consultation.

If you have any questions or would like to discuss this issue, please contact Nancy J. Brown, ACHP liaison to the BLM, by telephone at (202) 606-8582, or by e-mail at nbrown@achp.gov.

Sincerely,

Caroline D. Hall
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

Forwarded by Daniel Jacquet/CCFO/NV/BLM/DOI on 05/20/2010 02:57 PM

Ray Robbins

[REDACTED]

To Daniel_jacquet@blm.gov

05/20/2010 11:21

cc AM

Subject

American Flats BLM comments

Dear Dan,

I'd like to submit a simple proposal that the area that the old mill facility be completely demolished, removed, decontaminated, and reused. I realize the historical significance of the site, however I believe this to be far outweighed by the extreme danger it presents. A few suggestions would be to make the site a historical stop, complete with a picnic area. Another use of the land could possibly be excavated into a local recreation area open to horseback, off road vehicles, mt. bikes, and trails. Maybe both could be accomplished.

Regards,
Ray Robbins.

Same commenter, slightly different comment.

-----Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Monday, June 28, 2010 12:13 PM
To: Maureen Oshea-Stone
Subject: Fw: United Comstock Merger Mill

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

----- Forwarded by Daniel Jacquet/CCFO/NV/BLM/DOI on 06/28/2010 11:12 AM

"Doug Elmer"

[REDACTED]

06/28/2010 09:43
AM

<Daniel_Jacquet@blm.gov>

To

cc

Subject

RE: United Comstock Merger Mill

Best of luck with this issue. Being considered historic but since quite a bit of it is deteriorated and treacherous, especially to those who are stupid enough to run around inside, makes for a difficult balancing act. Having signs that say "Government Property" and "Trespassers will be prosecuted" will carry a lot of weight, however, even if it isn't feasible to enforce vigorously.

Doug Elmer
Virginia City

-----Original Message-----

From: Daniel_Jacquet@blm.gov [mailto:Daniel_Jacquet@blm.gov]
Sent: Monday, June 28, 2010 8:29 AM
To: Doug Elmer
Cc: [REDACTED]
Subject: Re: United Comstock Merger Mill

Thank you for your thoughtful comments. You basically selected the "No

Action" alternative where BLM would repair the existing fences and sign the property. We will keep you informed of the process. Thanks.

Daniel L. Jacquet
Community Liaison
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Rd, Carson City, NV 89701
775-885-6116 (w)
775-885-6147 (fax)
775-230-8107 (cell)

"Doug Elmer"



06/27/2010 05:35
PM

[<Daniel_jacquet@blm.gov>](mailto:Daniel_jacquet@blm.gov)

To

cc

Subject

United Comstock Merger Mill

Dan,

Sorry but I only just ran across the request for comments today, so you are welcome to ignore my comments.

Here goes:

To me, having a full-time guard would be an expensive long-term proposition (guard house, 3 people on shifts, 24/7/365, etc). Demolition and clean-up is also costly.

Putting up a security fence with razor wire long enough to go completely around the site would be expensive, also. Besides, determined trespassers will cut through whatever is installed - no matter what.

I suggest simply just repairing/replacing the existing fencing and put up warning signs every 50 feet around the perimeter with wording such as: "Government Property. DANGER: Unstable and treacherous structure. Trespassers will be fined and/or jail sentence. You have been warned." Then have another sign next to that describing the history and technical details of the remains. Maybe create a walking trail that goes all around the perimeter fence.

Regards,

Doug Elmer

Appendix B – Comments and Responses



ID	Name/Organization	Comment	Response
15	Terri Sutor	<p>I'm sending this message to voice my opinion as to what should happen to the unique mining mill structure in the American Flat area. Please, leave it as is!!! It's such an interesting enigma and should be preserved since I've been told that it is the largest construction of concrete in the U.S. My only suggestion is to post some signage indicating the history of the structure which would enlighten the public who come across it. Otherwise, let it stand!</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p>
16	Eileen Angelucci	<p>I have been following the proceedings regarding options for the mining mill structure in American Flat in the Comstock. I would like to voice my opinion that the structure should be left as is. It is part of our heritage and can be seen from the V&T. It would be a shame to see this go.</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p>
17	T.A. Taro	<p>Mr. Jacquet: I believe that the mill structures at American Flat should be preserved. True, the site can be termed an 'attractive nuisance,' but them so could El Capitan for BASE jumpers - Yellowstone abounds with many dangerous spots - People need to take some responsibly for themselves - ALL of the country can not, and should not become a 'Disneyland'</p> <p>This is part of 'our' local history, and needs to be preserved for future generations.</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p>

ID	Name/Organization	Comment	Response
18	Norman Dumont	<p>The United Comstock Merger Mill at American Flat should be FLATTENED to the GROUND.</p> <p>A specialist Earthquake Engineer once stated that:</p> <p>" Any Structure designed before 1973, or, that was built before 1976, has little or no earthquake design built into it. "</p> <p>The above statement would make the United Comstock Merger Mill a very dangerous structure that could not survive a significant Earthquake.</p> <p>If you want more proof of this, scratch the surface of the concrete with a hard steel nail or with a hardened spike or screwdriver.</p> <p>If the concrete falls away like sand, this is an even more dangerous structure.</p> <p>Good concrete should be GLASS Hard and Steel-Like Solid and the steel nail should not penetrate below the surface of the concrete.</p> <p>Core Samples can also be taken and analyzed.</p> <p>A Civil Engineer can confirm this.</p> <p>If so, demolish the United Comstock Merger Mill at American Flat.</p> <p>IN VANCOUVER, B.C.</p> <p>Norman . Dumont</p> <p>Definition of:</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site one of which is site demolition.</p>

ID	Name/Organization	Comment	Response
18		Analyze - Analysis is the process of breaking a complex substance into smaller parts to gain a better understanding of it.	
19	Dan Zampirro	It is my belief the mill should remain as it is. I dislike the graffiti and abuse to the structure, but it is very significant in its historical presence on the Comstock in American Flat. If a few people have been injured and one died there in 20 years, that is unfortunate. However, for the number of visitors to the site in that many years, these are not such bad statistics. Being out on the highway is probably less safe. It would cost the government(s) a small fortune to tear that structure down and haul it away, creating an environmental mess/headache. It is fine as it is, no need to recreate the wheel there. Same with the Carson River/mercury issue.	BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site one of which is site demolition. As part of these options, BLM will also evaluate protection of the site and recordation of site features.
20	Leon Henifin	My Son in law just had to take us to American Flats. I agree that this place is a huge government liability. Not only is the place dangerous with all the holes and deteriorating concrete, but you can tell there is all kinds of activities going on there. Shotgun shells, spay cans, peoples clothes, and I even found a 45 bullet. I heard that there were witchcraft sacrifices going on there. It should be dynamited and demolished. If not, it would make a good military training facility. It should be fenced off and the road made impassable.	BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site. Alternative 1 is current management, Alternative 2 is destruction of the facility, Alternative 3, Institutional controls would provide some mitigation of hazards while otherwise leaving the site as is. Alternative 4 - Selected Building Preservation would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.

ID	Name/Organization	Comment	Response
21	Caroline D. Hall, Advisory Council on Historic Preservation	<p>On May 14, 2010, the Advisory Council on Historic Preservation (ACHP) received the Bureau of Land Management (BLM) letter for the referenced undertaking, requesting our comments pursuant to the National Environmental Policy Act of 1969 (NEPA). We have no comments pursuant to NEPA at this time.</p> <p>We appreciate the early acknowledgement in the documentation you provided that the proposed undertaking will adversely affect historic properties. We request formal notification of adverse effects once they have been determined, as required under our regulations, "Protection of Historic Properties" (36 CFR Part 800). Please provide the required notification and documentation to the ACHP in accordance with 36 CFR § 800.6 and § 800.11(e). At that time we will make a determination as to whether we will participate in the Section 106 consultation.</p> <p>If you have any questions or would like to discuss this issue, please contact Nancy J. Brown, ACHP liaison to the BLM by telephone at (202) 606-8582, or by e-mail at nbrown@achp.gov.</p>	Thank you for your comment.
22	Ray Robbins	<p>I'd like to submit a simple proposal that the area that the old mill facility be completely demolished, removed, decontaminated, and reused. I realize the historical significance of the site, however I believe this to be far outweighed by the extreme danger it presents. A few suggestions would be to make the site a historical stop, complete with a picnic area. Another use of the land could possibly be excavated into a local recreation area open to horseback, off road vehicles, mt. bikes, and trails. Maybe both could be accomplished.</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site one of which is site demolition.</p>

ID	Name/Organization	Comment	Response
23	Doug Elmer	<p data-bbox="800 123 1297 212">Sorry but I only just ran across the request for comments today, so you are welcome to ignore my comments.</p> <p data-bbox="800 253 1360 626">Here goes: To me, having a full-time guard would be an expensive long-term proposition (guard house, 3 people on shifts, 24/7/365, etc). Demolition and clean-up is also costly. Putting up a security fence with razor wire long enough to go completely around the site would be expensive, also. Besides, determined trespassers will cut through whatever is installed - no matter what.</p> <p data-bbox="800 667 1360 1076">I suggest simply just repairing/replacing the existing fencing and put up warning signs every 50 feet around the perimeter with wording such as: "Government Property. DANGER: Unstable and treacherous structure. Trespassers will be fined and/or jail sentence. You have been warned." Then have another sign next to that describing the history and technical details of the remains. Maybe create a walking trail that goes all around the perimeter fence.</p>	<p data-bbox="1413 123 2001 402">BLM will evaluate a range of options to mitigate hazards at the site. Alternative 1 is current management, Alternative 2 is destruction of the facility, Alternative 3, Institutional controls would provide some mitigation of hazards while otherwise leaving the site as is. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p>

ID	Name/Organization	Comment	Response
24	Doug Elmer	<p>Best of luck with this issue. Being considered historic but since quite a bit of it is deteriorated and treacherous, especially to those who are stupid enough to run around inside, makes for a difficult balancing act. Having signs that say "Government Property" and "Trespassers will be prosecuted" will carry a lot of weight, however, even if it isn't feasible to enforce vigorously.</p>	<p>BLM will evaluate a range of options to mitigate hazards at the site. Alternative 1 is current management, Alternative 2 is destruction of the facility, Alternative 3, Institutional controls would provide some mitigation of hazards while otherwise leaving the site as is. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p>
		<p>Doug Elmer Virginia City</p>	
2	B. Bane	<p>I suggest the demolition alternative for the following reasons:</p> <p>1) 24 hour monitoring and security guard service doesn't seem realistic over the long haul. What happens a decade from now if budget cuts force the curtailment of monitoring? Then we have the same problem as now - an open attractive nuisance.</p> <p>2) Stabilization alternative is way more expensive and leaves only a few ramped up low walls to look at. The weird beauty of this place is the large industrial spaces & voids. Those big walls and voids will either be off limits or lowered to nothing under any of the alternatives, so we might as well just demo it all, make an open space, and save some money that might go somewhere (not here?) for other worthy projects. In other words, its doomed, so why not do it in a big way?</p> <p>P.S. What about a big implosion party? Our last big blowout there.</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site one of which is site demolition.</p>

ID	Name/Organization	Comment	Response
3	Judie Fisher-Crowley	<p data-bbox="800 123 1377 245">American Flat Cyanide Mill is a piece of mining history. At one time there was legislation to make American Flat the Nev. State Capital. The mill is also the only cement cyanide mill in the country.</p> <p data-bbox="800 285 1377 337">Another important factor of the mill is the graffiti art, which dates back to the 30's.</p> <p data-bbox="800 378 1377 532">I would recommend we make this into a State Park. Maybe using super-funded money. I believe we could receive Senator Reid's support. Nevada cannot afford to lose anymore of its history. I would gladly help in any way to make this a Park. Thank you.</p>	<p data-bbox="1413 123 1980 277">BLM has discussed the option of transferring the site to state control for the past decade. To date, the State of Nevada has not approached BLM with a proposal to acquire AFM. This action would not necessarily</p>

ID	Name/Organization	Comment	Response
4	Robert Frenchu	<p>This is in response to a request for comments regarding the mill site at American Flat.</p> <p>I'd like to see the site saved, if possible. I agree that it is historically significant, although the vandals have reduced its significance somewhat. With that in mind, I would like to see the issue handled (in order of preference from most desirable to least desirable and probably cost) thus:</p> <ol style="list-style-type: none"> 1. FENCE, PERMIT SYSTEM, AND WARNING SIGNS Place warning and informational signs* and fence around the area advising visitors that they need to have a permit from the BLM to enter; otherwise, no trespassing. Issuance of the permit would enable BLM to advise visitors of the various hazards, sign a waiver, and maybe even collect a little money. Probably won't go over very well with BLM due to extra work involved, liability, etc. 2. FENCE, WARNING SIGNS, AND SITE SECURITY Place warning and information signs and fence around the IMMEDIATE area (i.e. the large mill building itself) advising visitors that the area is dangerous and that trespassers will be prosecuted. Don't know what "site security" might be if it's not fences, though. Laser beams and web cams? 3. REMEDIATION OF HAZARDOUS AREAS ONLY Probably impossible to do 4. DEMOLITION <p>* Mentioning that it was a cyanide mill might be enough to scare off many visitors.</p>	<p>BLM understands the challenges of protecting the public while not unduly limiting access to public lands. Draft Alternative 4 - Selected Building Retention would result in demolition of three buildings and modifications to enhance public health and safety at the remaining structures. Buildings would be fenced and signed, but permits for entry are not currently part of any alternative.</p>

4

I will say that the only way to prevent idiots from hurting themselves is to remove the mill entirely, scrape the site clean, and plant nice, soft grass. As long as you have someone dumb enough to try to climb the stairs on an ATV (OIG-AML Report 7-08.pdf) there will be injuries which no amount of fencing, signs, guard dogs, or fines will prevent.

Being somewhat interested in Nevada mining history myself, I have visited the site on a few enjoyable occasions, and emerged unscathed, probably because I didn't go anywhere it was obviously unsafe. In fact, I have traveled many thousands of miles throughout the Nevada outback, encountering many abandoned mines, mill sites, and other potentially dangerous places. I easily eluded Death's clutches by observing warning signs, using common sense, and respecting other people's property rights.

I really dislike the idea of destroying the site because of a few morons who are too stupid to not see the potential dangers of riding an ATV up the stairs. I've always thought that educating people is better than trying to prevent everyone from hurting themselves. The theories of Darwin come to mind, although it might end the career of any BLM employee who mentioned it.

But, if you decide to blow it up, let us all know when, because I'd like to film it.

ID	Name/Organization	Comment	Response
6	Brigitta Hopkins	<p>My family and I love driving out to the old mill every few months to check out the new graffiti and just walk around the ruins.</p> <p>Each time we go, we go with camera's in hand and spend a few hours just taking photographs. We always knew someday someone would want to take this away and I'm asking the BLM to leave it in alone.</p> <p>Yes, it can be dangerous walking around and it does require one to be cautious. But it's no more dangerous than hiking a narrow mountain trail, or jumping a sandrail off the saddle at Sand Mountain. How many people have been killed riding ATV's? How many people have been killed skiing?</p> <p>How many people have drowned in Lake Tahoe or Pyramid Lake? There are inherent hazards in this world, one must choose the risks he takes.</p> <p>Please leave this relic for those of us who enjoy the history of our area.</p> <p>Feel free to place warning signs, and historical markers and remove debris but leave the mill as a historical place for our families to continue to enjoy.</p> <p>Brigitta Hopkins</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site.</p>
7	TA Taro	<p>Either Option #1 Do nothing or Option for Institutional Control</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site.</p>

ID	Name/Organization	Comment	Response
8	Larry Prater	I feel strongly that the mill is an historical asset to the Comstock Mining District, and should be preserved as much as possible. It is very visable from the newly restored V&T railway, and should be preserved as an asset to that enterprise.	BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.
9	Alan Preissler	Fence off the hazardous parts of the mill site. 1. This option would be probably the least expensive option; the cost saved vs. any destructive measures would pay for the fence's maintenance for probably decades. 2. The mill and its historical and cultural significance is preserved.	BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures. The relative costs of the alternatives will be evaluated to define reasonable and feasible options. This was completed as part of the U.S. Army Corp of Engineers (COE) report (COE 2010).

ID	Name/Organization	Comment	Response
10	Steve Walco	<p data-bbox="800 123 863 142">Hello:</p> <p data-bbox="800 253 1371 305">Thanks for providing an opportunity to comment on disposition of United</p> <p data-bbox="800 350 1234 370">Comstock Merger Mill at American Flat.</p> <p data-bbox="800 480 1371 850">The closest I've been to the Mill is when it was pointed out to me by our leader as we hiked along the V&T tracks from Virginia City to Moundhouse. I'm not an attorney, but I believe the legal term for the complex may be "attractive nuisance" and, as stated in the media release, it's continued existence almost certainly places the US Government in a position of having to defend itself (malfeasance?) for allowing the continued presence of what by all accounts is a good place to visit if you want to become seriously messed up...or dead.</p> <p data-bbox="800 896 1371 980">I don't agree with the description of the structure being "responsible for a death", any more than any inanimate object can be responsible for anything.</p> <p data-bbox="800 1026 1371 1305">That being said, efforts to restrict access through a variety of means have apparently been unsuccessful, and I suspect determined trespassers, eager to prove Darwin correct, will always stay one step ahead of any future efforts to secure the area. Short of 24/7 patrols, or other extremely expensive measures, I doubt it is possible to completely eliminate visitors.</p> <p data-bbox="800 1351 1371 1494">Historical significance has been mentioned as a justification for maintaining the facility, and while I grudgingly concede the point, I believe a comprehensive digital photographic record would suffice to memorialize the facility for posterity</p>	<p data-bbox="1413 123 2001 402">BLM will evaluate a range of options to mitigate hazards at the site. Alternative 1 is current management, Alternative 2 is destruction of the facility, Alternative 3, Institutional controls would provide some mitigation of hazards while otherwise leaving the site as is. Alternative 4 - Selected Building Retention would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p> <p data-bbox="1413 448 2001 532">As part of the project, site characterization will occur to define contamination. Action levels will be addressed under other actions.</p>

ID	Name/Organization	Comment	Response
10		<p>(perhaps the graffiti could be photo-shopped). Maybe a nice plaque at the site, as well. Frankly, as I travel through the Comstock, I can't help notice what a fine mess past generations have made of the area (although the current generation appears to be determined to do their part as well), and I see this Mill as just another monument to short-sighted business interests that despoiled the area and moved on, leaving the detritus of their efforts for future generations to ponder, and ultimately, deal with. There are more than enough structures littering the landscape that provide only minimal opportunities for careless people to injure themselves and I believe those artifacts should provide ample remembrance of the way things used to be.</p> <p>I vote for having the place declared a Superfund site (lots of mercury and cyanide about, I'm sure) and demolished...short term expensive; long term, a bargain.</p> <p>And don't forget the plaque...something bronze on a short pedestal might be appropriate.</p> <p>Again, thanks for the opportunity to comment.</p>	
11	Mathew Stearns	<p>All the buildings need the vaults and tunnels filled for safety. In addition the rebar needs to be cut out and any other holes could be covered with a mesh or sheet metal. Once this is done the area could be opened for recreational use w/ a permit to recoup the cost along w/ fines for litter and defacement. With a road for better access, law enforcement would have better access and ability to enforce the permits and or fines.</p>	<p>Alternatives 3 and 4 would include filling vaults, tunnels, voids, and other holes along with removing rebar. Recreation is not a designated use of this site eventhough it has been unofficially used as a recreational site. Recreation use is not considered in any of the alternatives.</p>

ID	Name/Organization	Comment	Response
12	Dale Verner	<p>1. Please try to save or record the many artistic efforts througout the structure. 2. If there was any money available, tours would be helpful. 3. Would you please publish a booklet of the history and pictorial record of the site? 4. Thank you for having the meeing. The speakers were very helpful and instructive.</p>	<p>Recordation of the graffitti art is a component of the three action alternatives and would be implemented in any action other than "no action".</p>
13	Keith Work	<p>Institutional Controls Alternative is my preference - to preserve history - local taxpayers and state/federal gov't decided to spend money to support re-construction of the V&T railway - seeing the mill structures is part of the history to be viewed from the train ride. Public safety may be desired, but it cannot be guaranteed. Determined persons will avoid protective and security measures. All safety hazards can never be removed, which applies to all BLM property. Please remember the old V&T RR engine house in Carson - torn down when it became inconvient to have it sitting emply. People come to the area to visit and see old buildings, not pictures of them.</p>	<p>BLM has initiated this project in response to the DOI Inspector General's Audit, which stated, "Longstanding hazardous conditions and excessive delays in mitigation at the American Flat Mill site present serious and unacceptable risks to the public health and safety." (DOI 2008). BLM understands the challenges of protecting the public while not unduly limiting access to public lands and will evaluate a range of options to mitigate hazards at the site. Alternative 1 is current management, Alternative 2 is destruction of the facility, Alternative 3, Institutional controls would provide some mitigation of hazards while otherwise leaving the site as is. Alternative 4 - Selected Building Preservation would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p>

ID	Name/Organization	Comment	Response
14	Joseph L. Curtis	<p>Director, Storey County Emergency Management, Virginia City, NV 89440 Chair, Storey County Local Emergency Planning Committee Owner, Mark Twain Bookstore, Virginia City, Nevada Historian of the Comstock area Author: American Flat, Stepchild of the Comstock Vice Chair, Comstock Historic District Commission Board Former member (15 years) Virginia City Convention and Tourism Authority Chief, Virginia City District, Storey County Volunteer Fire Department Chair, Storey County Board of Equalization Family businesses for the past 51 years in Virginia City Retired (1995), Carson City Sheriff's Department (Assistant Sheriff) 20 years</p> <p>CONCERNS: My primary concern is that decisions have already been made or ordered within the Bureau of Land Management (BLM) at high levels to raze the entire structure and the history be damned. Further, that the comments made by the public are of little importance or impact to the goals of the federal Inspector General's Office and the high level orders of the BLM. Since this meeting in Virginia City I have heard on the news (Reno TV) that the BLM plans to demo the structure entirely. I have also heard it while on the V&T RR train on 4-29-10 during a special ride it was so announced. I have heard if from the County offices as well. So, did I waste my time going to this meeting? Are those of us that care about the history just whistling in the wind? Is BLM going to disregard public concerns regardless? Is more our history going to disappear without regard to maintain historical fabric so as to provide support for the tourism economy upon which Virginia City exists?</p>	<p>The BLM has not made a decision to demolish the entire site. BLM will evaluate a range of alternatives from contuining current management to demolition, to preserving the most historic parts of the site. Alternative 4 -Selected Building Preservation, would result in demolition of five buildings and modifications to enhance public health and safety at the remaining structures.</p>

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OBSERVATIONS AND STATEMENT OF THE
RECOGNIZED PROBLEM:

The Comstock Merger Mill, commonly known as the "American Flat Mill" is a genuine historical structure located well within the confines of the Comstock Historic District. This is well established via BLM's own documents as presented at the public meeting of April 28, 2010 in Virginia City. This historical mill, during its short period of operation, had local, state, national and international impact pursuant to its processing of both silver and gold ores from the Comstock Lode.

Over the last thirty plus years I have witnessed the gradual natural decay as well as the intentional destruction of many historical structures, artifacts and icons of the magnificent history of the Comstock Lode, the birthplace of the great State of Nevada. If there is a way to sanitize an historical structure to such a point that it is safe to be around and does not pose a potential danger to the public then such should be done so as to preserve as much of the historical fabric of the Historic District as possible for the future generations.

The BLM has a responsibility, duty, and an inherent task to do just that and has, in the past been quite successful and effective in doing so to the point of commendation.

It is recognized that all such projects require funding and that poses problems. However, if funding is available for demolition (which is not cheap), then funding should be available (or able to be diverted) for the sanitizing and protection of this historical structure.

While I wholly support and defend the need to safe some portions of the structure for its historical relevance, I can authoritatively speak to the historical dangers of the structure over the past 30 or more years. I have personally responded to untold numbers of injured persons, stabbings, shootings, bonfires, abandoned and stolen vehicles, vehicle fires, fights, juvenile drinking parties, wild-land fires and fatalities occurring at the site. Para-military enactors and re-enactors, paint ball players, graffiti artists and others bent on vandalizing or disrespecting the facility

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are common to the site. However, also common to the site are history enthusiasts, researchers, authors, tourists, outdoor enthusiasts, hunters, ATV and motorcycle riders, hikers, bicyclists, walkers, site seers, family outings and the like that respect and enjoy the structure for its historical significance. This activity, legal, illegal, improper and proper, impacts both local Law Enforcement and Fire/EMS within the county for which BLM provides no assistance in mitigating. Granted, BLM is not afforded the needed law enforcement personnel and equipment necessary to deal with the matters that are left to the locals. These incidents alone, do not cry out for destruction of the structure or the general historical site. They merely bring to the forefront the need to clean the place up, properly and effectively limit access thereto and preserve and interpret the location as the historical structure that it is. An on-site watchman or caretaker is necessary to protect BLM's interests and had such been placed on-site many years ago, the money used to do these hazard studies and potentially contract the demolition of the site would have been much more effectively and intelligently used and we would have a wonderful historical resource site to this day and into the future. The structure has visual historical significance to the outdoor people, people on the train and others. It must be preserved for those people. This is not just some old concrete structure that with its disappearance nothing will be missed. It will be missed. It is part of the visual historical impact that must be preserved to some degree. If we take out all these aged and deteriorated structures then we will have nothing to show the public as to the history of the area. Since 1900 the structures, equipment, artifacts and materials have been leaving the Comstock for various reasons leaving us with very little to illustrate this national historic district.

MY SOLUTION:

Instead of razing the entire structure, core areas should be saved for their historical significance. The dollars committed to a potential razing should be redirected to preservation and interpretation. BLM

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should do a solid cost benefit analysis as to demolition and removal versus sanitizing and interpreting. I would bet you lunch the cost of clean-up and preservation (arrested decay) and interpretation would far less expensive. Refer to your cost/benefit analysis of the matter.

There is a lot of hanging and displaced concrete, rebar and other materials that will have to be removed from the site to make it safe. Holes will have to be covered over or filled in with concrete. Certain accesses will have to be covered over to prevent access. Access to unsafe areas will have to be closed off. Certain buildings and structures will have to be razed, but not all of them.

However core structures need to be saved for visual historical value and fenced off with 12 foot fences. An interpretive center, kiosk, or other structure should be put together to provide for historical interpretation. You would probably spend less money doing this than the razing process where you will have to contract with a demolition outfit, then haul away the remains and pay to dump the residue in a landfill. Use those dollars more wisely.

I personally would be willing to assist in the interpretive work.

CONSIDERATIONS:

Don't remove the history, sanitize it and interpret it for the public. Use your dollars wisely. Removal of Nevada's historical fabric benefits no-one and denies future generations the ability to enjoy and appreciate the history of the Comstock Lode, once known as "The Richest Place on Earth."

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