

P. O. Box 143, Carson City, Nevada 89702-0143

2013 JAN -9 PM 1:18
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BUREAU OF LAND MGMT
CARSON CITY
DISTRICT OFFICE

December 31, 2012

Mr. Brian L. Buttazoni
Sierra Front Field Office
U.S. Bureau of Land Management
5665 Morgan Mill Road
Carson City, NV 89701

Dear Mr. Buttazoni:

The purpose of this letter is to strongly object to the tri-party agreement between the BLM, the Advisory Council on Historic Preservation, and the Nevada State Historic Preservation Officer to completely demolish the very significant remains of the historic United Comstock Merger Mill on American Flat.

Built between 1920 and 1922, the \$4 million project was the largest cyanide-process mill in the world. More than 1,000 men worked on building the mill; a complete city with hotels, offices, stores, saloons, and a movie theater; and a tunnel almost two miles long to deliver Comstock ore via an ingenious underground railway. It was the largest concrete mill in the United States and could process 3,000 tons of gold and silver ore a day. The facility has local, regional, statewide, national, and international significance.

With the fall of the price of silver approaching the stock market crash of 1929, the thriving 250-employee plant was closed about five years after its opening. Most of the massive machinery was sold for scrap but a surprising number of the imposing poured-in-place concrete structures have stood for more than 90 years.

The American Flat mill was served via specially-constructed spur and side tracks totaling 2-1/2 miles in length by Nevada's fabled Virginia & Truckee Railway. The Comstock Merger Mill was the last major industrial site constructed along the V&T. The Comstock Merger often fed the V&T train crew, as they could be switching cars at the mill quite late at night. Often the train crew tied up in Virginia City for the night and the train crew slept in the original 1870 V&T Passenger Station which still stands in the shadow of St. Mary's in the Mountains.

Today the significant ruins of the vast mill and neighboring city of Comstock are major historical and cultural resources. They are eagerly viewed by the nearly 80,000 annual riders on the revived Virginia & Truckee Railroad – a major regional tourist attraction. The history and significance of the mill is orally interpreted on-board for riders as well as in the railroad's official printed guidebook.

BLM's proposal to remove all of the structures and re-vegetate the seven-acre property would destroy a major cultural and historical asset. BLM's "Finding of No Significant Impact" for the draft environmental study is not realistic. We are aware of the public safety hazards some of the concrete structures pose but total demolition is only one of the proposed solutions.

We strongly urge the BLM to reconsider its current position.

We urge the BLM to save at least some portion of the structure(s) and safely secure some vestige of this important facility for the Virginia & Truckee Railroad's current and future 80,000 annual riders and as a setting for other visitors to see and enjoy. The facility is an important and highly visible piece of Nevada history.

By way of introduction, the Virginia & Truckee Railroad Historical Society is a non-profit Nevada Corporation dedicated to the research and dissemination of V&T history through its illustrated quarterly newsletter, the **V&T Telegraph**, special publications, and its annual V&T History Conference in Western Nevada. The Society has a strong and vocal constituency with membership throughout 23 states and five foreign countries.

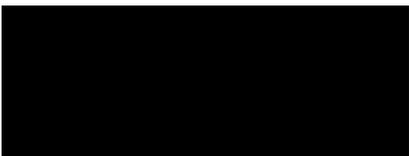
We strongly urge reconsideration of your decision to demolish everything that still remains from this significant 90-year old facility.

Some historical images of the Comstock Merger Mill are enclosed. Please contact us if we can assist in any way with your reconsideration of this important issue.

Sincerely,



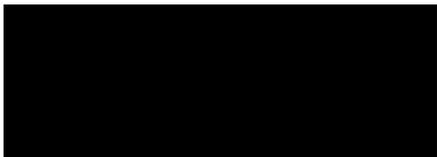
Michael A. Collins



Stephen E. Drew



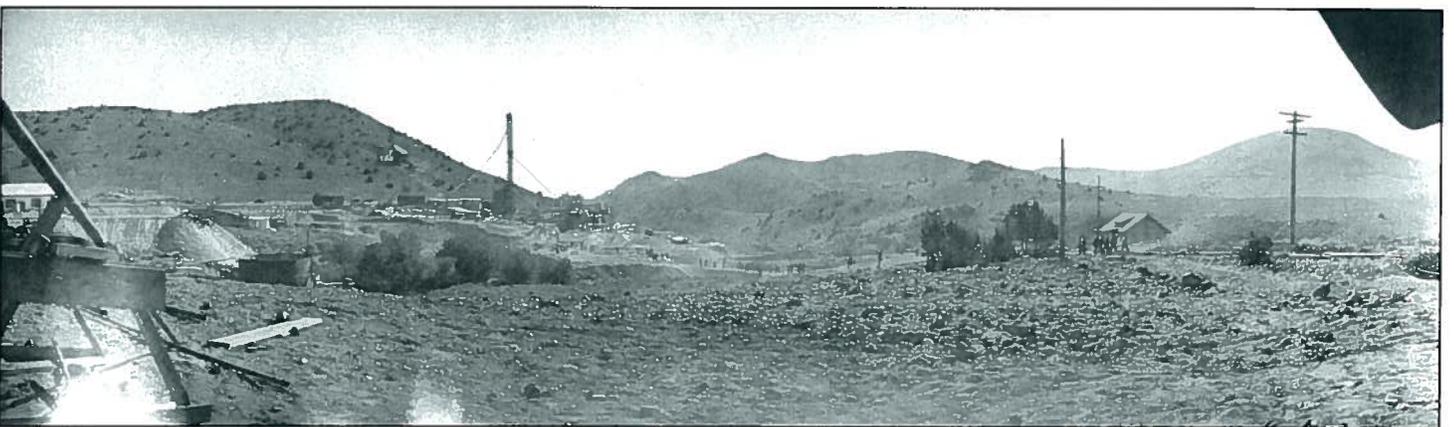
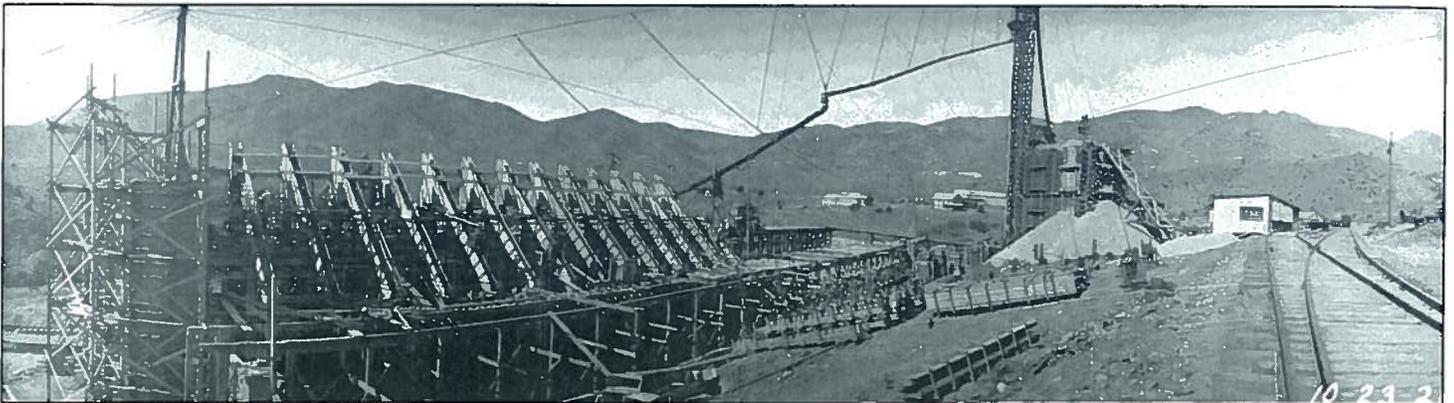
Enclosures



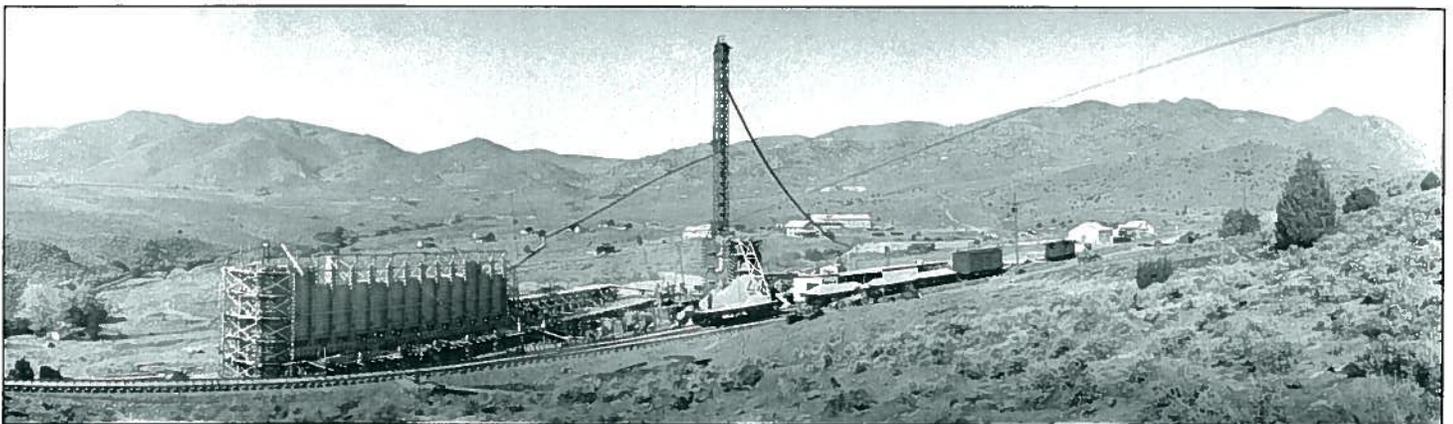
United Comstock Merger Mill



Above: September 8, 1921. Below: October 23, 1921.



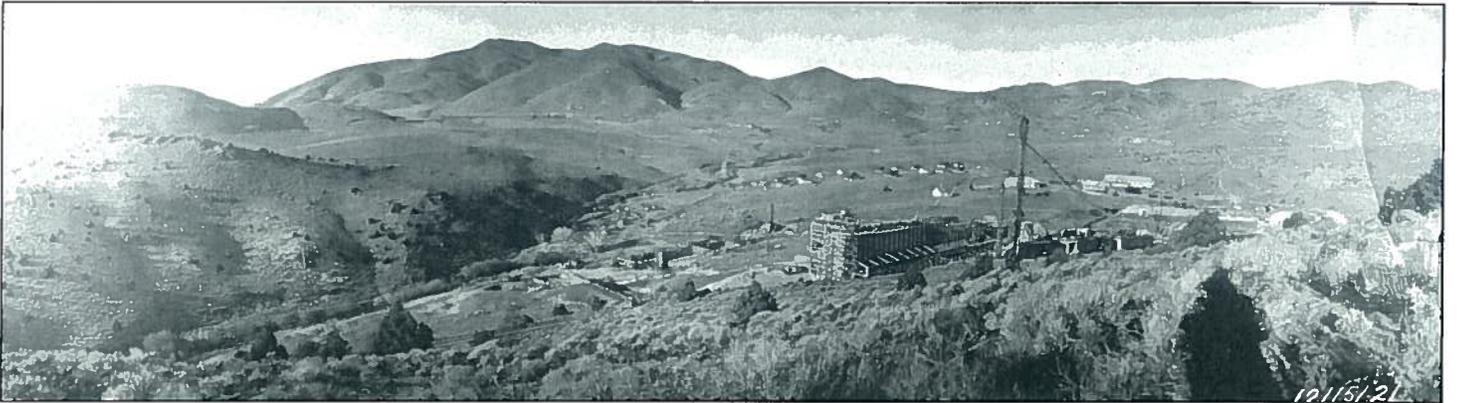
Above and below: October 31, 1921. (Stephen E. Drew collection)



United Comstock Merger Mill



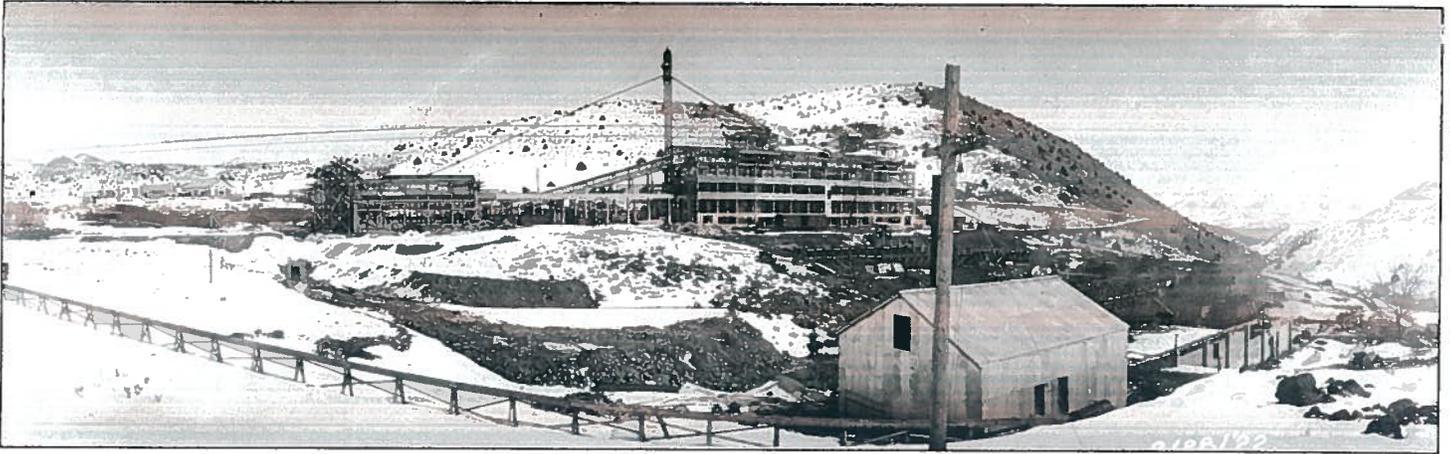
Above: December 14, 1921. Below: December 15, 1921.



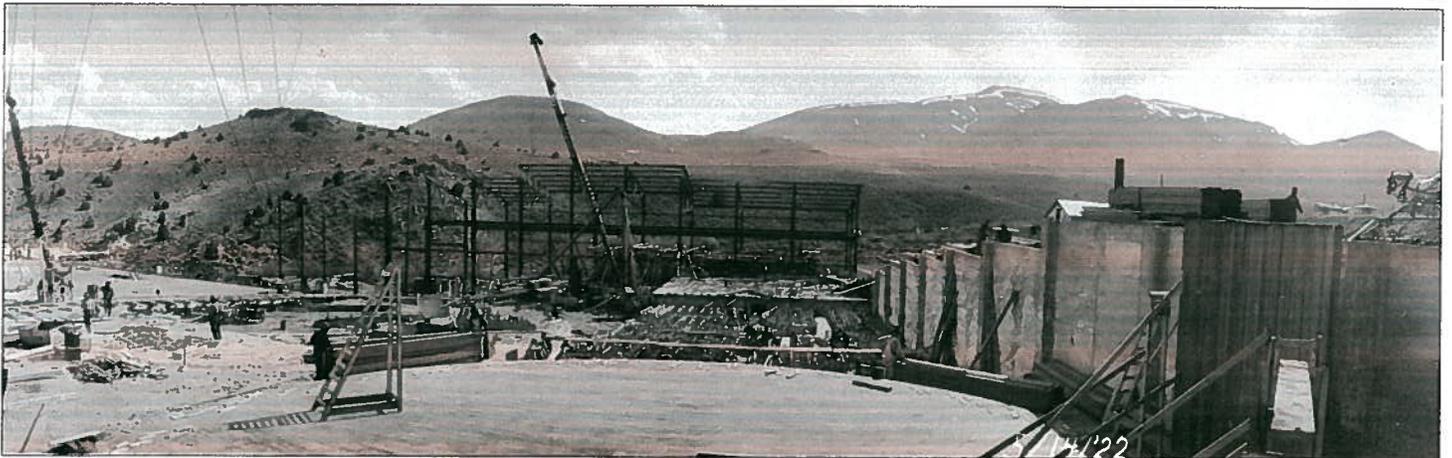
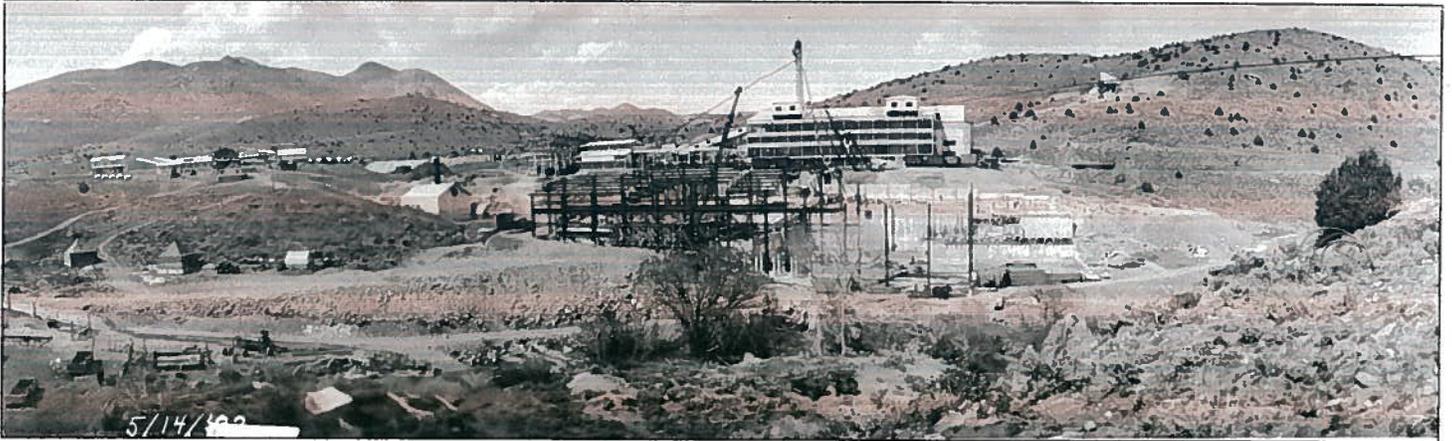
Above and below: January 8, 1922. (Stephen E. Drew collection)



United Comstock Merger Mill



Above: February 28, 1922. Below: May 14, 1922.

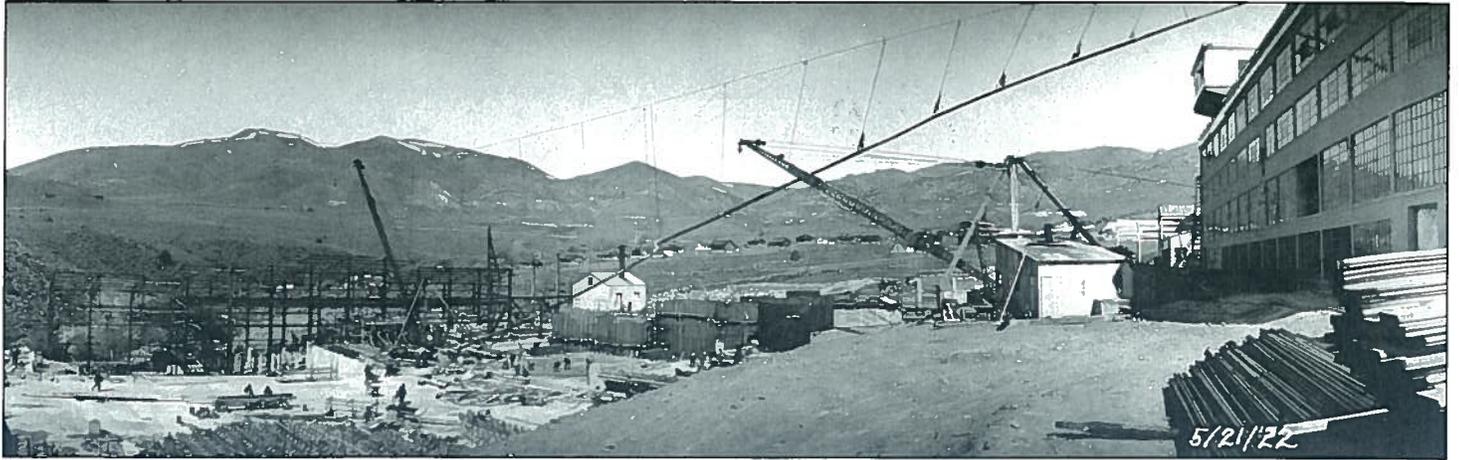


Above: May 14, 1922. (Stephen E. Drew collection)

I hereby certify that the above is a true and correct copy of the original as shown to me by the
DELIVERY RECEIPT *May 3 1922*
COMSTOCK MERGER MINES, Inc. *1074*
 DESTINATION: *Virginia & Truckee Railway, Inc.*
 RECEIVED BY: *Virginia & Truckee Railway, Inc.*
 BY: *W. H. G. S. T. H. S.*
 SPECIAL AGENT: *T. J. H. C. W. H. S.*
 WEIGHT: *6200* BARS: *53* PERCENT: *90.45* ASSAYS: *4310* TOTAL: *2670*
 MAY 5 - 1922
 TOTAL TONNAGE: *6304*
 SPECIAL AGENT: *W. H. G. S. T. H. S.*
 SIGNATURE: *W. H. G. S. T. H. S.*

REPLICATES APR 1 1924
 THE UNITED COMSTOCK MINES CO.
 AMERICAN RAILWAY EXPRESS CO. INC.
 THE UNITED STATES OF AMERICA
 Quantity: *16 BARS* Value Marked by Shipper to be: *15,400.00* COMMERCE TO: *Smelting* DESTINATION: *Elko Nevada*
 Article: *Ballion Smelting* Prepaid Charges: *2.10*
 Lot # *68* Ref. # *20* Freight: *2.10*
 Total: *15,402.10* Insurance: *2.10*
 Total: *15,404.20*

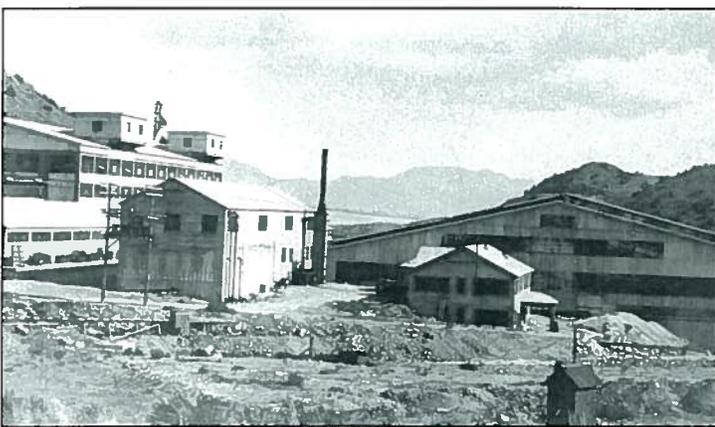
United Comstock Merger Mill



Above: May 21, 1922.



Both above: (Mackay School of Mines)

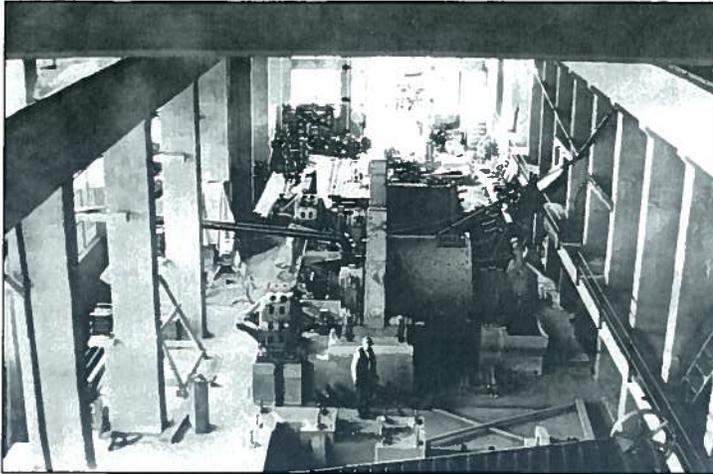


(Ronald J. Allen collection)

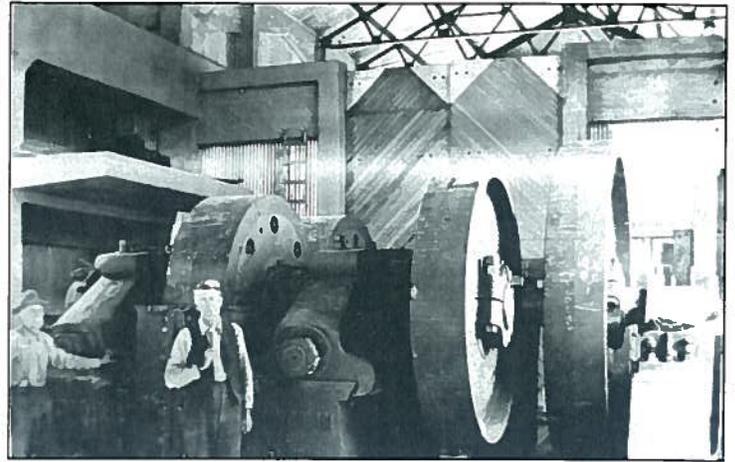
THE UNITED COMSTOCK MINES CO.,

W. A. Winter
Manager.

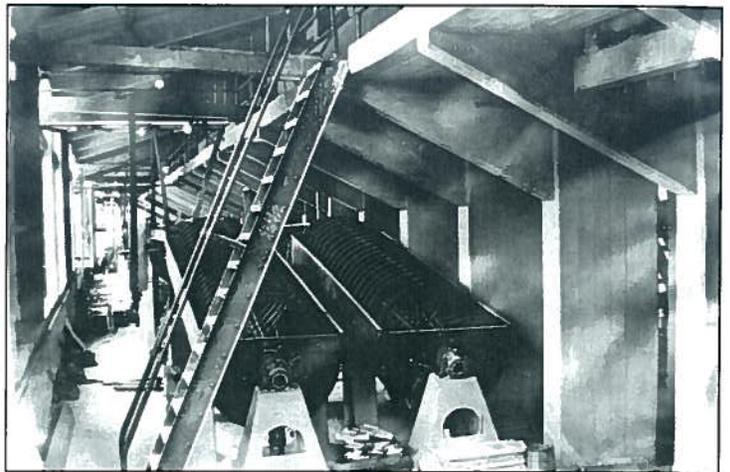
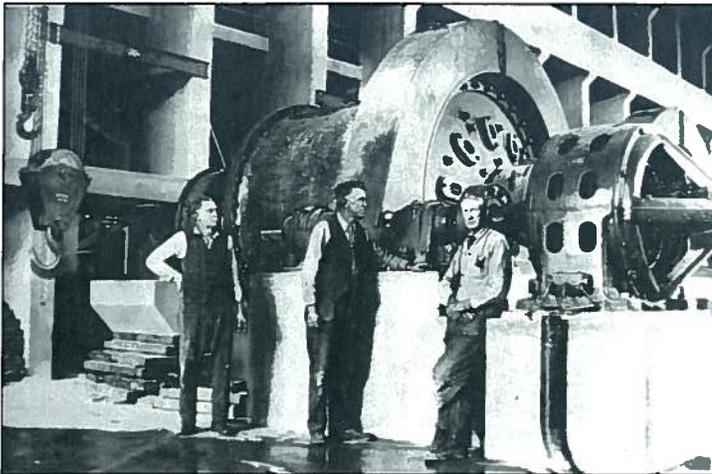
United Comstock Merger Mill



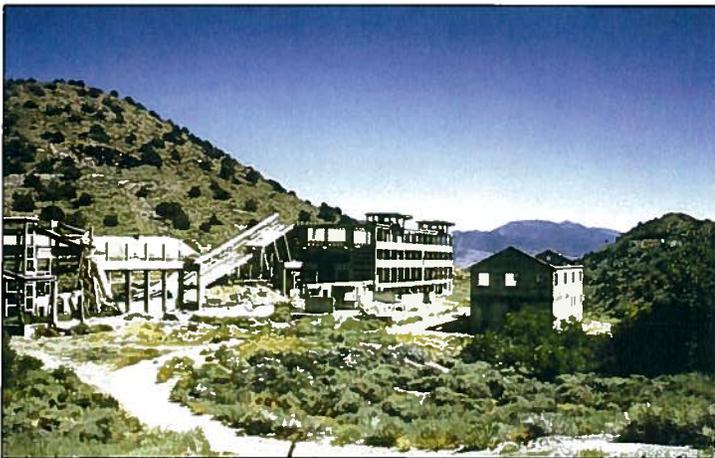
Concentrate de-waterer in foreground.



210,000 lb. 72-inch coarse crusher. (Mackay School of Mines)



Two of the AITKENS set up on washer floor. (Mackay School of Mines)



September 1962. (Richard C. Datin, Jr. photo)



2010. (BLM photo)

BLM Project Manager Brian Buttazoni
Sierra Front Field Office
5665 Morgan Mill Road
Carson City, Nevada 89701

Re: 1620 (NVC0200)

Dear Mr. Buttazoni:

I read with dismay your letter of 12-5-2012 relating the audit of the Inspector General's office regarding the American Flat Mill site. I live in American Flat with a clear view of the mill. I have NEVER seen or heard an ambulance or police car there.

The mill site is an historic feature that has been used by many hundreds of people. It is a major cultural artifact that is important for people of four counties: Lyon, Storey, Carson City, and Washoe. It is a major attraction for the Virginia and Truckee Railroad, which traverses American Flat and pauses for about 1/2 hour on the tracks opposite the building for photographs and a small commentary on the mill.

The designation "high liability public safety hazard" is certainly an inflammatory phrase. Of the hundreds, more likely thousands, using this facility for recreation, one person has died, a man riding an ATV up a flight of stairs inside the building. The machine fell, taking him with it. His family accepted this as ridiculous behavior on his part and brought NO action against the BLM.

Why not rip up highways when someone dies on them? The logic is the same. The liability issue is a red herring, a decision easy to make from a distance of thousands of miles. It ignores the impact on all of us who cherish their adventures there and see the mill as an icon of their youthful spirit. "Interpretations" are a mighty poor substitute.

Instead of destroying this tiny piece of our cultural heritage, why not spend the money stabilizing the structure? Install signage warning individuals they enter the grounds AT THEIR OWN RISK and disclaim responsibility. As an archaeologist, I have done survey throughout Nevada, and have seen such signs on public lands, warning people that they investigate lands beyond the sign AT THEIR OWN RISK.

I also know the BLM is MANDATED BY LAW to preserve historic resources. The many historic sites in private hands are deteriorating at a rapid pace, as everyone who drives the route to Virginia City clearly sees. The BLM must HONOR its mandate.

This decision is a huge insult to Nevadans. Implementing it would be a major mistake.

I'd appreciate a response.



Susan Stornetta



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12-16-2012
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Brian Buttazoni
Sierra Front Field Office
Carson City District
5665 Morgan Hill Rd.
Carson City, NV 89701
Email: AmericanFlatEA@blm.gov

BUREAU OF LAND MANAGEMENT
CARSON CITY DISTRICT OFFICE
5665 MORGAN MILL ROAD
CARSON CITY, NV 89701-1448

RE: Comments regarding the 2012 Environmental Assessment of the United Comstock Merger Mill in American Flat (AMF), Storey County Nevada.

Brian Buttazoni,

I believe the FONSI issued by BLM regarding the AMF property is based on an EA which contains inadequate/incomplete information, mischaracterized data, as well as false and contradictory conclusions. The BLM, SHPO, ACHP Programmatic Agreement (PA) associated with the 2012 EA is not consistent with the language of CFR 800.10 (a) regarding the treatment of NHL's. The PA fails to provide for public participation at a level consistent with the public's interest in the project. The 2012 EA is flawed in many of the same ways as the 2010 EA.

The AMF site is a significantly contributing element within the Virginia City National Landmark Historic District (VCNLHD) which has been determined by the National Park Service (NPS) to be "endangered". The EA fails to acknowledge this "endangered" status and fails to comprehensively assess the significance of the AMF within the context of the district as a whole. The proposed action alternative 2 will further the loss of integrity to the NHL thus exacerbating this endangered status. The EA fails to address this issue in a comprehensive manner as directed under sect. 110(f) of the NHPA.

The EA fails to recognize the lack of available data regarding all the cultural resources within the district. In particular, there is currently no Historic American Landscape Survey (HALS) of the VCNLHD. The lack of a HALS inventory of the VCNLHD prevents the BLM from fully analyzing any adverse effects. The EA is therefore inadequate. The loss of the AMF will have a cumulative adverse effect on the VCNLHD.

I believe the mitigation measures outlined in the draft FONSI are short term, inadequate, and do not fully mitigate the loss of the AMF as a visual and structural historic resource. The long term effect of Alternative 2 will be the sterilization of the American Flat area of all structural historic resources. The previous actions of Houston Oil and Mineral coupled with the current actions of Comstock Mining Inc. will result in a visual landscape devoid of historical context. The remaining landscape will no longer be capable of conveying any expression of historic mining.

The AFM is a unique resource on a national and local level. It is the only remaining 20th century resource the visitor can experience that emotes the scale of mining and milling of the Comstock Lode. It is the only milling complex of its size remaining in the Virginia City/Gold Hill area of the

District and it is the one of the few resources within the VCNLHD held in public ownership. It is the only resource within the VCNLHD representative of the International Architectural style. The AFM was once one of those places within the district known only to locals. The AFM has become more important as a result of the reconstruction of the V & T Railroad from Gold Hill to Carson City. The AFM is easily one of the most prominent and important visual resources riders of the V & T experience. The EA fails to adequately recognize these elements in the analysis. Under the proposed Alternative 2 the AMF will become a memory documented by picture in a brochure, a video, and a museum model.

The report prepared by Walter and Green and submitted by the NV SHPO provides an additional alternative than any of the proposed 4 alternatives in the EA. This alternative seems to be the most in keeping with the spirit of the NHPA. The report contains methodology for conservation, cost estimates, and an assessment of the value for retaining the AFM as a historic resource within the VCNLHD.

On Page 23-24 of EA The BLM responds to the report as follows:

“This alternative’s “interpretation” and “visitor management” programs are vague in nature, without enough detail to provide for an evaluation of effectiveness in meeting the project’s purpose and need – especially in regards to mitigating public safety hazards. While the study identifies new measures to stabilize the buildings, it does not provide sufficient detail about associated public use, access control, interpretation, and site safety measures to fully evaluate all resources, or the effects to the human environment. As such, this alternative was eliminated from further analysis and consideration in this EA.”

I would challenge this assessment and conclusion. The contents of the 2012 AFM EA does not provide any more detail regarding methodology, mitigation measures, or assessment of impacts in regards to any proposed alternative than the Walters and Green report. The 2010 EA included cost estimates for the various alternatives, the 2012 does not. It seems inappropriate for the BLM to criticize the Walters and Green report as insufficient and not include any cost estimates in the 2012 EA.

The Area Potential Effects (APE) delineated in the EA fails to consider the importance of the AFM within the context of the NHL as a district. The APE should include the entire VCNLHD. Attachment A “Map of Project Area” delineates both the National Register Historic District boundary as well as the National Landmark boundary. In the text of the EA however, when discussing potential affects, only the immediate area surrounding the AFM is considered. This is a serious flaw which taints all conclusions regarding the importance of the AFM as significant contributing element of the Landmark as well as all conclusions regarding adverse and beneficial effects of any action alternatives.

It is my hope that the BLM will reconsider the conclusions contained in the EA and the FONSI. The AMF site is of great value to the historic district as a physical resource and worthy of much more than documentation and demolition.

Larry Wahrenbrock



NOTES:

CFR§ 800.10 Special requirements for protecting National Historic Landmarks.

(a) *Statutory requirement.* Section 110(f) of the act requires that the agency official, *to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.* When commenting on such undertakings, the Council shall use the process set forth in §§ 800.6 through 800.7 and give special consideration to protecting National Historic Landmarks as specified in this section. (Emphasis added)

From http://www.nps.gov/hps/fapa_110.htm

“In addition to complying with the requirements of Section 106, Agencies should consider the revised guidance set forth in the Section 110 Guidelines published by the National Park Service (NPS).¹ Standard 4 of the guidance applies to the Federal agency project planning, and provides a very useful summary of factors that should be considered when planning undertakings that involve NHL’s.”

STANDARD 4. An agency gives historic properties full consideration when planning or considering approval of any action that might affect such properties. [Sec. 110(a)(2)(B),(C), and (E), and Sec. 402 (16 U.S.C. 470a-2)].
National Historic Landmarks

(j) National Historic Landmarks (NHL) are designated by the Secretary under the authority of the Historic Sites Act of 1935, which authorizes the Secretary to identify historic and archaeological sites, buildings, and objects which "possess exceptional value as commemorating or illustrating the history of the United States." Section 110(f) of the NHPA requires that Federal agencies exercise a higher standard of care when considering undertakings that may directly and adversely affect NHLs. The law requires that agencies, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark." In those cases when an agency's undertaking directly and adversely affects an NHL, or when Federal permits, licenses, grants, and other programs and projects under its jurisdiction or carried out by a state or local government pursuant to a Federal delegation or approval so affect an NHL, the agency should consider all prudent and feasible alternatives to avoid an adverse effect on the NHL. [Sec. 110(a)(2)(B) and Sec. 110(f)].

(k) Where such alternatives appear to require undue cost or to compromise the undertaking's goals and objectives, the agency must balance those goals and objectives with the intent of section 110(f). In doing so, the agency should consider:

(1) the magnitude of the undertaking's harm to the historical, archaeological and cultural qualities of the NHL;

(2) the public interest in the NHL and in the undertaking as proposed, and,

(3) the effect a mitigation action would have on meeting the goals and objectives of the undertaking.



College of Liberal Arts
University of Nevada, Reno

2013 JAN 24 PM 1:06

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20 January 2013

Brian Buttazoni
Sierra Front Field Office
Carson City District
5665 Morgan Hill Rd.
Carson City, NV 89701

Dear Mr. Buttazoni,

Elizabeth Raymond and I have conducted both visual and historical research on, and about, American Flat, and herein include one of our reports published in a scholarly text reader; 1997 or 1998, thereabouts. We would like to contribute to the public comment section, as we think that the mill continues to be important historically and alternatives to its demolition should be actively sought.

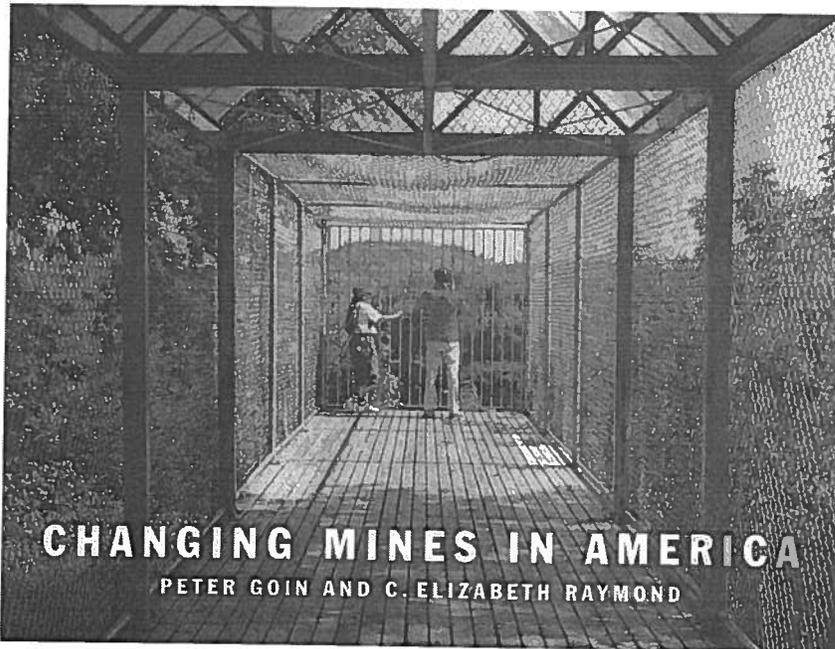
With best wishes,

Peter Goin
Foundation Professor of Art

Department of Art
School of the Arts
University of Nevada, Reno/224
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(775) 784-6655 fax
www.unr.edu/art

CHANGING MINES IN AMERICA

PETER GOIN AND C. ELIZABETH RAYMOND



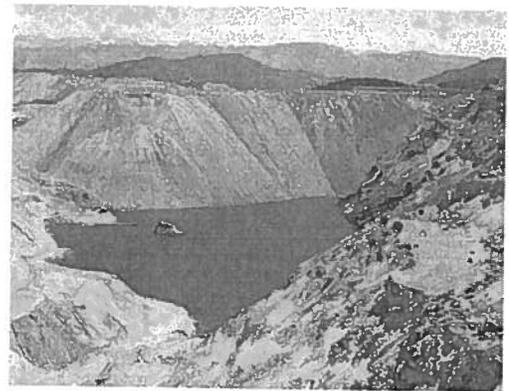
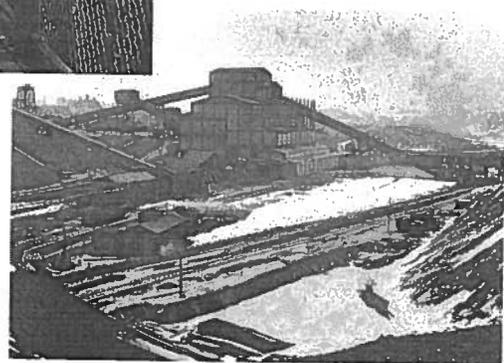
240 p., 34 duotones 101 color plates

"This compelling new book lures in with a synergistic blend of fine art photography and landscape history. The images starkly realistic, sometimes dreamlike and unworldly, complement a text that informs and tells a good story."

Thomas C. Hunt,
Director of Reclamation, Environment, and Conservation,
University of Wisconsin-Platteville

Most Americans today view mines as little more than ugly scars on the landscapes, places with no connection to an American way of life. This creative new work by Peter Goin and C. Elizabeth Raymond, however, will force many to rethink that impression. The authors present eight visual and historical essays that examine eight mining sites across the United States and their roles in American history and culture. The volume's engaging writing and striking photographs show how mines are not simply physical degradations, but rather unique cultural artifacts of the American landscape.

Published by the



**PHYSICAL GRAFFITI:
Mining Legacies at American Flat**

**Peter Goin and Elizabeth Raymond
University of Nevada, Reno**

When the wife of nineteenth-century publishing magnate Frank Leslie visited the Comstock Lode in 1877, she was appalled by what she saw. The towns were dreary and the terrain daunting: "Nowhere does one find a level . . . the vision loses itself among the crowding brown peaks and waving mountain ranges, never coming to any resting point of level or of greenery, before the horizon line closes the dreary scene . . . like a magnified Yosemite trail with all the attractiveness left out." Despite being graciously entertained by her host, and seeing numerous sights in the company of luminaries, she did not tour the mines themselves. The descent by elevator into the shaft of the California Mine reminded her too much of death. The whole experience was one of chaos and disruption: "We saw machinery enough to drive one crazy, and were almost suffocated with its hot, oily smell and steam."¹

Other travelers were more intrigued by what they saw on the Comstock. Grace Greenwood, writing four years earlier than Mrs. Leslie, was at first put off by the "great brown hills" that seemed "gashed and scarred and marred and maltreated in every way. But in happier days succeeding, these same bleak hills grew to

have for me a sort of grim grandeur and savage attractiveness." Indeed, for Greenwood, the boldness and daring of the mining enterprise was exhilarating. Visiting in the early days of the 1870s boom period that came to be known as the Big Bonanza, she witnessed a heady renewal of mining excitement on the Comstock, when "the talk [was] constantly of new discoveries." Unlike Leslie, Greenwood actually climbed down into the Chollar-Potosi mine and clambered around its workings. After the fact, she reported the experience was rather like visiting the Roman catacombs, without the latter's characteristic musty smell.²

The ambivalence about mining represented by these two nineteenth-century women is hardly surprising. Contemporary observers of mining landscapes note the prevailing tendency to characterize them as waste places, "a kind of elitism that prevents us from understanding what such places really mean to the people who create and inhabit them." Such meanings, obviously, change over time and vary among inhabitants. They are often more difficult to recover than the impressions of tourists and visitors. Sometimes, however, the physical contours of a place give evidence of its meaning and uses. One striking modern example is located on the Comstock Lode, in the subdistrict known as American Flat.³

Part of the area that both Leslie and Greenwood visited in the 1870s, American Flat has had a long, sporadic history as a mining site. Approximately one mile square, it is located west of the main Comstock mines, and was first worked in the 1860s, shortly after the discovery of the lode. Reportedly the place received its name because the miners who labored there were American, rather than the Mexicans and Chinese who predominated elsewhere in Gold Canyon at that time.⁴

The district was formally established in 1864 and the settlement of American City grew up around it. Available water, always a scarce commodity on the Comstock, was among its attractions; and it briefly competed to become the capital of the new state of Nevada in the mid-1860s. The American Flat mines proved disappointing, however, and American City remained small. Its post office was discontinued in 1868; and the last mines closed in the late 1880s, after they flooded. The buildings were removed or decayed in place. It was not a place featured on either Greenwood's or Leslie's tour.

In the early twentieth century, American Flat enjoyed a revival. At the beginning of the nineteenth-century Nevada silver boom, Americans lacked "the same subtlety to extract all the metal which Welsh and German mills have attained." So considerable

value was left in the remaining dumps of waste rock. Seeking to recover this value, a group of Nevada mining engineers organized the United Comstock Mines Company and bought up rights to mines throughout the district. Their goal was to re-process both low-grade ore deposits and tailings on the Comstock.⁵

In 1921, in order to recover this metal, the new company built at American Flat what was reputed to be the largest cyanide mill in the world. The United Comstock Merger Mill had the capacity to process two thousand tons per day. The massive complex is shown in the accompanying photo, as it appeared at its opening in 1922. Clearly anticipating a long and prosperous

{insert photo #1 about here}

future, the owners built with the newest materials and techniques. The mill's concrete and steel construction was at the time unique, designed to be both solid and permanent. A new company town grew up around the mill to house, feed, and entertain its workers.⁶

Unfortunately as short-lived as its predecessor, the second town of American Flat disappeared by the end of the decade, after the price of silver collapsed during the 1920s. Hovering around \$1 per ounce at the time the mill was completed, it dropped to 60 cents by 1926, and 25 cents in 1929. The impact was predictable. The post office closed in 1927 and the machinery of the

magnificent plant was dismantled and sold for scrap. By the 1970s, the site had again subsided into ruin, and people came to American Flat to use the concrete remains as a shooting gallery or a hideaway, a canvas for graffiti. While no written descriptions of American Flat remain, there is mute evidence of its changing functions and meanings in the photographic record, and in the physical evolution of the structure itself.

More recently in the 1980s, American Flat was revived for a third time as a milling site. Houston International Mineral Corporation began operations on the Comstock in the late 1970s, including an open pit mine at Gold Hill and some underground exploration. Its sodium-cyanide mill--this time a less substantial structure designed to be dismantled--began operating at American Flat in 1980. Shortly thereafter, the properties were sold to United Mining Company. In a familiar story, the latter company stopped production in 1985, and put the American Flat mill up for sale. All mining and milling operations there have once again ceased. This time the remains of a cyanide processing pond have been added to the landscape of American Flat.⁷

Today, as in the 1970s, American Flat is a popular site for various semi-illicit amusements, including motorcycle gang gatherings, paint ball games, and a phantasmagoric collection of

graffiti, some of which is included as part of this photoessay. Adaptive reuse here gains new meaning, as the seventy-year-old remains of the mill buildings have become a popular place for various alternative recreations, including performance art. Two movies were even filmed amidst the colorful industrial ruins, which are located on public land.⁸

The terrain is contested, however. The 1996 death of a visitor whose rented ATV (all-terrain vehicle) flipped over while he was attempting to climb the ruins, triggered public outcry about the mill ruins and epitomized the difficulty. A place that the Storey County Sheriff denounces as an "attractive nuisance" is also eligible for listing on the National Register of Historic Sites. The Bureau of Land Management, which has official responsibility for the site, struggles to develop a suitable management plan for a place to which, as the agency observes, "the public is attracted . . . both for its historical and visual features and for non traditional uses such as paint ball games, graffiti, climbing, medieval warfare games, parties, etc."⁹

Residents are similarly divided. Some vigorously deplore the mill's reputation as a party place. Others recall its history as a working landscape and celebrate its graffiti as art. A travel writer describes American Flat as "a fascinating place to

explore":

The multi-story main building looks more like an abandoned parking garage and there are other strange and intriguing shapes in the twisted, hulking concrete ruins. . . . Standing under the graffiti-covered cement archways adjacent to the creek, there is a kind of disquiet and unease in the air--as if the site knows it deserves a better afterlife than the one it has been given.

And yet, many are attracted to the site at American Flat precisely **because** of the outlaw afterlife it has assumed.¹⁰

Amidst such ambiguity, and worried about its legal liability in the event of future accidents, the BLM in 1996 began the process of restricting access to the American Flat millsite. The Federal Register notice of the proposed closure disapprovingly described a place "popular for numerous undesirable public uses and unlawful activities." On the list of prohibited activities were campfires, possession or use of paint and spray paint, offroad use of motorized vehicles, detonation of explosives and rockets, and discharge of firearms. Instead, a draft version of a 1997 site guide suggested visitor activities such as picnicking, walking, historic study, and photography.

At the same time, the agency internally conceded the inadvisability of "chain link or high protection fencing," because "any fencing without extraordinary measures such as guard dogs or electricity will not keep out those that choose to willfully

violate the closure." The subtlety of the signage strategy they ultimately chose to employ is perhaps lost on adherents of the old style of open access to American Flat.

As the BLM struggles to "interpret" this multi-faceted mining site, the various cultural meanings of American Flat continue to jostle uneasily against each other, as they have for decades. In more ways than one, the ruins at American Flat have become a kind of physical graffiti, the record of an ongoing, popular cultural debate about the control, uses, and meanings of mining's legacy in the Nevada landscape.

In 1995, in an ironic twist, there were proposals to develop American Flat a fourth time, this time as a conventional amusement park. Developers announced plans to build the Silver Spur Heritage Cultural Center, a "theme-town/movie studio" that would combine commercial recreation for tourists with a wild west theme town available to movie production companies in "a living history lesson." To date, no construction has commenced and residents' informal use of the site continues unabated. If the Silver Spur Center is ever built, however, the Comstock Lode will have spawned its own historical simulacrum, and previous meanings of American Flat--both as a working mining landscape and as a free expression zone--will once again risk erasure.¹¹

This visual exploration of American Flat is part of a larger collaborative study by the authors, respectively a landscape photographer and historian, that will combine visual and historical analysis to examine and question prevailing contemporary notions of mining landscapes as waste places. Other topics include Minnesota's Mesabi Range, the anthracite coal district of northeastern Pennsylvania, and the modern gold-mining operation at Rawhide, Nevada.

Notes