



Brian Sandoval
Governor

Leo M. Drozdoff, P.E.
Director

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
COMSTOCK HISTORIC DISTRICT COMMISSION
P.O. Box 128, 20 North "E" Street
Virginia City, Nevada 89440
PH (775) 847-0281, FAX (775) 847-0653

2013 JAN 22 PM 2:06
RECEIVED
BUREAU OF LAND
MANAGEMENT
CARSON CITY
DISTRICT OFFICE

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

Re: Final Draft Environmental Assessment, United Comstock Merger Mill, Storey County, NV

January 17, 2012

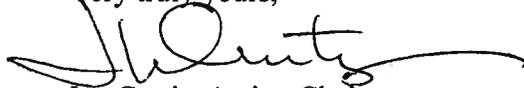
Dear Mr. Buttazoni:

Thank you for notifying the Comstock Historic District Commission (CHDC) that the Bureau of Land Management (BLM) is presently seeking public comment on the final draft of the Environmental Assessment (EA) for the United Comstock Merger Mill complex located in American Flat, Storey County, Nevada. The CHDC wishes to object in the strongest possible terms to the selection of total demolition as the BLM's preferred alternative for treatment of this important historic resource. The CHDC is in favor of stabilization and mothballing this site as outlined in the report written by Green and Walters that is appended to the draft EA. This option is both affordable and, with minimal management activities on the part of the BLM, would result in both mitigation of the present public safety issues at the site and retain an historic mill complex critically important to the integrity of the Virginia City National Historic Landmark and the Comstock Historic District. Rest assured that if this nationally significant property, and the BLM, were subject to the requirements of NRS 384, the proposed demolition would not be approved by the CHDC. History is our livelihood on the Comstock and to short-sightedly destroy this site is not in either the cultural or economic interests of the people of Nevada and the Nation as a whole.

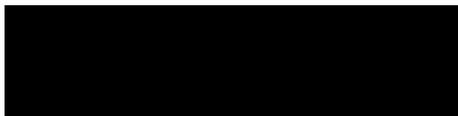
In reviewing the draft EA, CHDC staff has identified one possible omission that could significantly impact your decision regarding the site. In the sections on Hazardous Materials, you state that the site, including the concrete that is the primary material for the structural ruins of the mill buildings, has been analyzed for assorted hazardous elements. The report lists metals, cyanide, dioxins and petroleum hydrocarbons. There is no mention of asbestos. In the 1920s, when these buildings were built, it was a common practice to mix fibrous asbestos into concrete prior to pouring in order to enhance fire resistance. This practice was particularly prevalent in industrial construction. If this was done at American Flat there is no mention of it in the draft EA. Given the significant probability that there is asbestos in the concrete, it would be prudent for an analysis to be done prior to issuing the final EA. Needless to say, if there is asbestos in the concrete, estimated demolition costs could change dramatically.

Thank you for the opportunity to express our views and your kind attention to them.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Joe Curtis". The signature is fluid and extends to the right with a long tail.

Joe Curtis, Acting Chair





Brian Sandoval
Governor

Leo M. Drozdoff, P.E.
Director

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
COMSTOCK HISTORIC DISTRICT COMMISSION
P.O. Box 128, 20 North "E" Street
Virginia City, Nevada 89440
PH (775) 847-0281, FAX (775) 847-0653

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

Re: Final Draft Environmental Assessment, United Comstock Merger Mill, Storey County, NV

January 17, 2012

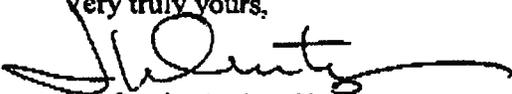
Dear Mr. Buttazoni:

Thank you for notifying the Comstock Historic District Commission (CHDC) that the Bureau of Land Management (BLM) is presently seeking public comment on the final draft of the Environmental Assessment (EA) for the United Comstock Merger Mill complex located in American Flat, Storey County, Nevada. The CHDC wishes to object in the strongest possible terms to the selection of total demolition as the BLM's preferred alternative for treatment of this important historic resource. The CHDC is in favor of stabilization and mothballing this site as outlined in the report written by Green and Walters that is appended to the draft EA. This option is both affordable and, with minimal management activities on the part of the BLM, would result in both mitigation of the present public safety issues at the site and retain an historic mill complex critically important to the integrity of the Virginia City National Historic Landmark and the Comstock Historic District. Rest assured that if this nationally significant property, and the BLM, were subject to the requirements of NRS 384, the proposed demolition would not be approved by the CHDC. History is our livelihood on the Comstock and to short-sightedly destroy this site is not in either the cultural or economic interests of the people of Nevada and the Nation as a whole.

In reviewing the draft EA, CHDC staff has identified one possible omission that could significantly impact your decision regarding the site. In the sections on Hazardous Materials, you state that the site, including the concrete that is the primary material for the structural ruins of the mill buildings, has been analyzed for assorted hazardous elements. The report lists metals, cyanide, dioxins and petroleum hydrocarbons. There is no mention of asbestos. In the 1920s, when these buildings were built, it was a common practice to mix fibrous asbestos into concrete prior to pouring in order to enhance fire resistance. This practice was particularly prevalent in industrial construction. If this was done at American Flat there is no mention of it in the draft EA. Given the significant probability that there is asbestos in the concrete, it would be prudent for an analysis to be done prior to issuing the final EA. Needless to say, if there is asbestos in the concrete, estimated demolition costs could change dramatically.

Thank you for the opportunity to express our views and your kind attention to them.

Very truly yours,



Joe Curtis, Acting Chair



STATE OF NEVADA

COMSTOCK HISTORIC DISTRICT
COMMISSION

P.O. BOX 128

VIRGINIA CITY, NEVADA 89440

(775) 847-0281 PH

(775) 847-0653 FAX

FAX COVER SHEET

TO: Brian Bethzani

FAX#: 885-6147

DATE: 1/18/13

OF PAGES INCLUDING COVER: 3

FROM: CHDC

FAX#: (775) 847-0653

MESSAGE: Comment on AmFlat EA

Had copy to follow via

snail mail.

-Bet

If all pages not received please phone Bet at (775) 847-0281



BRIAN SANDOVAL
Governor

STATE OF NEVADA
COMMISSION ON MINERAL RESOURCES
DIVISION OF MINERALS
400 W. King Street, Suite 106
Carson City, Nevada 89703
(775) 684-7040 • Fax (775) 684-7052
<http://minerals.state.nv.us/>

Las Vegas Branch:
2030 E. Flamingo Rd.
Suite #220
Las Vegas, Nevada 89119
(702) 486-4343
Fax (702) 486-4345

ALAN R. COYNER
Administrator

January 17, 2013

Brian Buttazoni
Planning and Environmental Coordinator
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Road
Carson City, NV 89701

2013 JAN 24 PM 1:18
RECEIVED
BUREAU OF LAND MGMT
CARSON CITY
DISTRICT OFFICE

Re: United Comstock Merger Mill EA

I am writing on behalf of the Nevada Division of Minerals (NDOM) to provide comments on the United Comstock Merger Mill at American Flat Environmental Assessment (DOI-BLM-NV-C020-2012-0040-EA). In 1987, the Nevada Legislature created the Nevada Abandoned Mine Lands (AML) program within the Division of Minerals and mandated two primary functions: 1) Investigation and inventory of mining-related openings and structures at mining sites that are currently idle or abandoned, and 2) Development and maintenance of an aggressive public awareness campaign to educate the public about dangerous conditions that exist as a result of historic mining activities.

Following the 1996 fatality at American Flat, 13 AML features on or within the historic structures were inventoried by NDOM staff pursuant to the AML program and determined to be "dangerous conditions", as defined by Nevada Administrative Code (NAC) 513.230. The BLM and NDOM have been working diligently ever since to address the AML hazards present at the site. Unfortunately, the BLM fencing and warning signage at American Flat have been subjected to repeated destruction and vandalism.

Despite numerous multi-agency cooperative efforts to protect the public from the physical safety hazards posed by the ever-deteriorating structures, injuries and incidents, as well as the burden on public safety and law enforcement agencies to respond, have continued at American Flat. Only under the Proposed Action (Alternative 2 – Demolition) would public safety be of paramount concern and permanently addressed. The Nevada Division of Minerals supports Alternative 2 as outlined in the above-referenced environmental assessment.

Sincerely,

Alan R. Coyner
Administrator



Buttazoni, Brian <bbuttazoni@blm.gov>

American Flat EA - NDOM comments

1 message

Alan Coyner [REDACTED]
To: "bbuttazoni@blm.gov" <bbuttazoni@blm.gov>
[REDACTED]

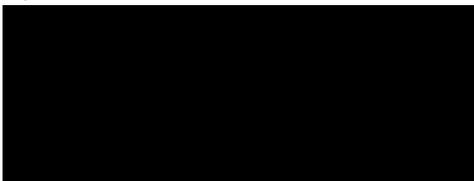
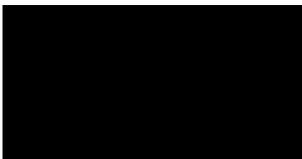
Tue, Jan 22, 2013 at 2:34 PM

Please see attached.

Alan R. Coyner

Nevada Division of Minerals

Commission on Mineral Resources



AmFlat_comment_011713.pdf
96K



BRIAN SANDOVAL
Governor

STATE OF NEVADA
COMMISSION ON MINERAL RESOURCES
DIVISION OF MINERALS
400 W. King Street, Suite 106
Carson City, Nevada 89703
(775) 684-7040 • Fax (775) 684-7052
<http://minerals.state.nv.us/>

Las Vegas Branch:
2030 E. Flamingo Rd.
Suite #220
Las Vegas, Nevada 89119
(702) 486-4343
Fax (702) 486-4345

ALAN R. COYNER
Administrator

January 17, 2013

Brian Buttazoni
Planning and Environmental Coordinator
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Road
Carson City, NV 89701

Re: United Comstock Merger Mill EA

I am writing on behalf of the Nevada Division of Minerals (NDOM) to provide comments on the United Comstock Merger Mill at American Flat Environmental Assessment (DOI-BLM-NV-C020-2012-0040-EA). In 1987, the Nevada Legislature created the Nevada Abandoned Mine Lands (AML) program within the Division of Minerals and mandated two primary functions: 1) Investigation and inventory of mining-related openings and structures at mining sites that are currently idle or abandoned, and 2) Development and maintenance of an aggressive public awareness campaign to educate the public about dangerous conditions that exist as a result of historic mining activities.

Following the 1996 fatality at American Flat, 13 AML features on or within the historic structures were inventoried by NDOM staff pursuant to the AML program and determined to be "dangerous conditions", as defined by Nevada Administrative Code (NAC) 513.230. The BLM and NDOM have been working diligently ever since to address the AML hazards present at the site. Unfortunately, the BLM fencing and warning signage at American Flat have been subjected to repeated destruction and vandalism.

Despite numerous multi-agency cooperative efforts to protect the public from the physical safety hazards posed by the ever-deteriorating structures, injuries and incidents, as well as the burden on public safety and law enforcement agencies to respond, have continued at American Flat. Only under the Proposed Action (Alternative 2 – Demolition) would public safety be of paramount concern and permanently addressed. The Nevada Division of Minerals supports Alternative 2 as outlined in the above-referenced environmental assessment.

Sincerely,

Alan R. Coyner
Administrator



BRIAN SANDOVAL
Governor

STATE OF NEVADA
COMMISSION ON MINERAL RESOURCES
DIVISION OF MINERALS
400 W. King Street, Suite 106
Carson City, Nevada 89703
(775) 684-7040 • Fax (775) 684-7052
<http://minerals.state.nv.us/>

Las Vegas Branch:
2030 E. Flamingo Rd.
Suite #220
Las Vegas, Nevada 89119
(702) 486-4343
Fax (702) 486-4345

ALAN R. COYNER
Administrator

FACSIMILE TRANSMITTAL SHEET

Date: 2/19/13

TO: Company/Organization: BLM - Carson City District

Individual: Brian Buttaioni

Fax Number: 775 - 885 - 6147

Phone Number: _____

Number of pages (including cover-sheet): 2

SENDER: Nevada Division of Minerals, Carson City Office

Individual: Alan Coyner

REMARKS:

American Flat EA comments



BRIAN SANDOVAL
Governor

STATE OF NEVADA
COMMISSION ON MINERAL RESOURCES
DIVISION OF MINERALS
400 W. King Street, Suite 106
Carson City, Nevada 89703
(775) 684-7040 • Fax (775) 684-7052
<http://minerals.state.nv.us/>

Las Vegas Branch:
2030 E. Flamingo Rd.
Suite #220
Las Vegas, Nevada 89119
(702) 486-4343
Fax (702) 486-4345

ALAN R. COYNER
Administrator

January 17, 2013

Brian Buttazoni
Planning and Environmental Coordinator
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Road
Carson City, NV 89701

Re: United Comstock Merger Mill EA

I am writing on behalf of the Nevada Division of Minerals (NDOM) to provide comments on the United Comstock Merger Mill at American Flat Environmental Assessment (DOI-BLM-NV-C020-2012-0040-EA). In 1987, the Nevada Legislature created the Nevada Abandoned Mine Lands (AML) program within the Division of Minerals and mandated two primary functions: 1) Investigation and inventory of mining-related openings and structures at mining sites that are currently idle or abandoned, and 2) Development and maintenance of an aggressive public awareness campaign to educate the public about dangerous conditions that exist as a result of historic mining activities.

Following the 1996 fatality at American Flat, 13 AML features on or within the historic structures were inventoried by NDOM staff pursuant to the AML program and determined to be "dangerous conditions", as defined by Nevada Administrative Code (NAC) 513.230. The BLM and NDOM have been working diligently ever since to address the AML hazards present at the site. Unfortunately, the BLM fencing and warning signage at American Flat have been subjected to repeated destruction and vandalism.

Despite numerous multi-agency cooperative efforts to protect the public from the physical safety hazards posed by the ever-deteriorating structures, injuries and incidents, as well as the burden on public safety and law enforcement agencies to respond, have continued at American Flat. Only under the Proposed Action (Alternative 2 – Demolition) would public safety be of paramount concern and permanently addressed. The Nevada Division of Minerals supports Alternative 2 as outlined in the above-referenced environmental assessment.

Sincerely,

Alan R. Coyner
Administrator

LEO M. DROZDOFF, P.E.
Director
Department of Conservation and
Natural Resources

RONALD M. JAMES
State Historic Preservation Officer

BRIAN SANDOVAL
Governor

STATE OF NEVADA



Address Reply to:
901 S. Stewart Street, Suite 5004
Carson City, NV 89701-5248
Phone: (775) 684-3448
Fax: (775) 684-3442

www.nvshpo.org

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION OFFICE

January 18, 2013

Brian Buttazoni
Sierra Field Office
Bureau of Land Management
5665 Morgan Mill Road
Carson City NV 89701

RE: United Comstock Merger Mill at American Flat Environmental Assessment,
Storey County (Undertaking #2010-209).

Dear Mr. Buttazoni:

The SHPO has reviewed the subject Environmental Assessment for the undertaking.

The SHPO does not support the Proposed Action as described in the Environmental Assessment made available for public review on December 6, 2012. We believe this action does not adequately consider the historic, cultural, and economic significance of this complex within the National Historic Landmark as demonstrated by the unprecedented public opposition to its demolition.

The SHPO continues to believe that in an environment of scarce taxpayer dollars, the report provided by our office (Walters 2012) represents the foundation for an affordable, balanced alternative that both meets the purpose and need for action and preserves this significant element of the Landmark for future generations.

If you have any questions concerning this correspondence, please feel free to contact me at [REDACTED]

Sincerely,


Rebecca Lynn Palmer
Acting State Historic Preservation Officer