

American Flats – Historic Treasure or Trashy Deathtrap?

Cultural Preservation vs. Public Safety

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The American Flats Mill (United Comstock Merger Mill) consists of eight decaying concrete buildings high in the mountains on 27 acres of BLM-managed land near the edge of Virginia City, Nevada. It was built in 1922 to process Comstock Lode ore in cyanide vats and was the largest concrete structure in the world at that time. It operated only briefly before it was shut down because of process inefficiencies and low silver prices. All equipment, related metal and wood was salvaged, leaving only poorly reinforced concrete structures. It has become a notorious recreational spot; parties, paintball wars, and other unauthorized activities are now common at the graffiti-covered site. Two fatalities and numerous injuries prompted closure of the site to public access in 1997, but it still gets 60 or more visitors weekly according to local law enforcement. The massive structures are characterized by large holes in the floor, falling concrete, unprotected drop-offs, flooded tunnels and subterranean vaults, party debris, burned vehicles, and other hazards. The millsite was the subject of very negative commentary in the 2008 Office of the Inspector General (OIG) audit of abandoned mine lands in the Department of Interior. The Nevada BLM concurs that elimination of these threats to public safety is a high priority. Nevertheless, the site maintains a dramatic beauty and has attracted much attention from photographers, historic preservationists, and even MTV music video producers, which has thwarted past mitigation efforts. These problems are not uncommon to public land management in the west – dredges and shaft headframes in the far north and west often share them. While valued as elements of the cultural landscape, they are physically impossible to preserve or stabilize. The BLM is now addressing the challenge of documenting and interpreting the site in a way that will satisfy historic preservationists and regulatory demands without compromising the several historic district designations and still permit its eventual removal. This process is complicated by the poor access and short field season that the near-7000 foot elevation and the adjacent Sierra Nevada entail.

The American Recovery and Reinvestment Act of 2009 provided the opportunity to fund a comprehensive analysis of the site, leading to an Environmental Assessment and pending agreement with the State Historic Preservation Office to demolish the site, contingent on extensive cultural mitigation. The Nevada BLM is now developing a detailed demolition and disposal plan while it completes cultural documentation and mitigation in compliance with the

National Historic Preservation Act. With a final plan, we plan to solicit assistance from a wide variety of industry, agency, and military entities including the Nevada Mining Association and its members, the U.S. Army Corps of Engineers, the Nevada National Guard, the Nevada Division of Minerals, and other potential partners.

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