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INTRODUCTION

The Board of County Commissioners for Storey County, Nevada (Commissioners) recognized a need to summarize previous planning documents for the portion of Storey County which lies within the Comstock Historic District, to update these planning documents and to prepare the information in a way that is accessible for making management decisions. A request for proposals to undertake this task was distributed on November 13, 1989, and modified on November 22, 1989. Archaeological Research Services, Inc. (ARS) was selected to carry out the contract. This planning summary takes two forms. Most important is a series of sensitivity maps on clear overlays suitable for use in public planning meetings. This set contains five maps: Landscape Sensitivity, Historic Archaeological Sensitivity, Prehistoric Archaeological Sensitivity, Architectural Concentration and Integrity, and Mineral Resources Sensitivity. This map set is supplemented with a written report containing background data, documentation of methods, a review of recommendations made in previous planning documents, and updated recommendations for the management of landscape, archaeological, architectural, and mineral resources. Included in the recommendations for the management of archaeological resources is an annotated outline of *A Plan to Mitigate Adverse Impacts on Cultural Resources in the Storey County Portion of the Comstock Historic District*. Finally, the report of an archaeological inventory which was conducted to test one of the archaeological sensitivity zones is included.

This report is not an attempt to duplicate all of the exhaustive documentation available in earlier studies, but to summarize previous data in a more accessible manner, and to update previous material where appropriate.

SENSITIVITY MAPS

Section 1 of the scope of work requires production of a set of sensitivity maps reflecting areas of significant history, archaeology, mining and landscape features. It was determined in subsequent communications among ARS, the Commissioners, the Nevada Division of Historic Preservation and Archaeology (NDHPA) and the Comstock Historic District Commission (CHDC) that these topics would be shown on a series of five maps, all of which were to be prepared as overlays on a transparent medium. The base map for all of these overlays is a composite of the U.S.G.S. Steamboat, Chalk Hills, Virginia City, and Flowery Peak 7.5' topographic maps.

The sensitivity map set provides a means to quickly gain a general idea of what resources are in an area and of their importance. From these, potential developers can anticipate problems they might encounter, to a certain degree. Within each map, higher sensitivity ratings imply greater potential costs, both in time in gaining permission to conduct a development, and in monetary costs involved in mitigating adverse impacts to significant resources. It should be emphasized that the maps are general--there are significant sites in low sensitivity areas and there are small areas of low sensitivity in zones mapped as being highly sensitive.

LANDSCAPE SENSITIVITY

The importance of landforms was recognized by the 1980 Comstock Project:

The environmental setting of the Comstock historic sites and structures contributes an important part of what we perceive about the area's character. The land features of the Comstock influenced patterns of prehistoric and historic settlement, create the visual setting for the historic towns we see today, serve as landmarks to its people and symbols of the Comstock to visitors. Any change or destruction of these features could irreversibly change the character of the district and diminish its historic integrity.

Landforms need to be recognized in preservation planning in the same way as historic sites, by being inventoried and recorded so that planners can set priorities for preservation and measure the future impact of change against some benchmark (HCRS 1980c:64)

Landforms which were considered significant by the 1980 Comstock Project fall into five categories: Unique, Imageable, Typical, Linked with the District's History, and A Significant Part of the District's Natural Environment. Landforms which were determined by the Comstock Project to be significant in one or more of the above categories are Sixmile Canyon, Sevenmile Canyon, mine pits, dumps (dredge tailings, mill tailings, waste rock dumps), Flowery Ridge (including Kate Peak, Mt. Grosh, Rose Peak, Emma Peak, Flowery Peak), Sugarloaf Mountain, the Virginia Range (including Mt. Bullion, Butler Peak, Wakefield Peak, Mt. Davidson, Cedar Hill), The Divide/Greiner's Bend, Gold Canyon, American Ravine, American Flat, Basalt Mesa, Devil's Gate, and Hartford Hill. These landforms were documented on NAER inventory cards (HCRS 1980c:66-67. Some of the more prominent cultural landscape features have been recorded in various inventories but recording was not uniformly done throughout the district. There are no specific guidelines for managing these resources.

The emphasis of the current project is to divide the overall landscape into three distinct elements, and then to prepare a sensitivity map regarding landscape features for the entire project area. These elements are a) location and characterization of visual corridors or "viewsheds," b) identification and characterization of natural landscape features, and c) identification and characterization of cultural landscape features.

Visual Corridors

Visual corridors or viewsheds are of importance primarily for the consideration of the integrity of location, setting, feeling, and association of significant properties in the Comstock Historic District. This integrity is an essential part of all such properties. Identification and sensitivity ratings of visual corridors are oriented toward the maintenance of this integrity as viewed by visitors to the district. Visual corridors were identified using topographic maps and field checked with an automobile reconnaissance of the study area. Areas on the maps were ranked in descending

order of significance as follows: A) visible from Virginia City and Gold Hill, B) visible from main approaches to the Comstock on SR 341 or SR 342, C) visible from major secondary routes in the district to historic areas such as Sixmile Canyon and American Flat, and D) not visible from these areas. Viewsheds outside the boundaries of the Storey County segment of the Comstock Historic District were not be considered, though areas within the study area visible from approaches to the Comstock that are outside the study area but that have to be traversed by travelers approaching the Comstock were included in zones B or C where appropriate. The capital letter A-D denoting the viewshed forms the first half of the key for each landscape zone shown on Map 1.

Recommendations

Developments that would be visually obtrusive should be carefully regulated in Corridor A, with decreasing levels of regulation in Corridors B and C. Highly obtrusive developments should be encouraged to locate in Corridor D, preferably in areas of that corridor which have already been developed sufficiently to alter the natural visual environment. If visually obtrusive developments are undertaken in highly visible areas, the impacts of these developments should be lessened by minimizing grading and trying to match existing contours, use of low-visibility colors for structures which cannot be made to look like part of the historic built environment, and use of designs that comply with CHDC guidelines.

Cultural Landscape Features

Human alterations on the landscape resulting from mining and related activities dominate most views of the district. These alterations, i.e., the mine dumps, open pits, roads, terraces, septic ponds, sanitary landfills, and so on, comprise the cultural landscape of the district. Due to the massive number of individual features that have been created over time, data for the sensitivity maps have been somewhat generalized. The emphasis is on identifying zones of related landscape features rather than identifying single features.

Preliminary identification of cultural landscape features was done during an automobile tour of the project area. Once identified, the features were categorized according to function and major time period from dated historic photographs, Historic American Engineering Record data, limited documentary review, and further field inspection. Sensitivity ranking is highest for early landscape features and lowest for features less than 50 years old which do not contribute to the significance of the historic district. Another term for these recent cultural landscapes is "disturbance". Cultural landscapes were assigned a two character code for mapping purposes. The first character is a "c" followed by a 3 for relatively pure nineteenth century landscapes, a 2 for landscapes from the period 1900-1940 or areas with infilled nineteenth century landscape features, or a 1 for landscapes which are generally less than 50 years old.

Recommendations

Cultural landscapes are a critical part of the setting of the historic district. Remnants of nineteenth-century cultural landscapes are a scarce resource and should be carefully protected. Since the great underground mines of the Comstock are hidden, the old mine dumps are critical to convey the feeling that this is a major mining area, not just a picturesque residential town.

Most cultural landscape areas are a combination of features from many different time periods. These areas, which are primarily in Sensitivity Zone C2, require case-by-case evaluations of impacts on cultural landscapes including mine and mill dumps, tailings, terraces, streets, earthworks, introduced woodlands, and so on.

Natural Landscape Features

Natural landscape features were also identified from an automobile reconnaissance of the district. Only areas with minimal disturbance were considered natural landscape features. It should be noted that there are many significant archaeological sites and small features within natural landscape areas--but these sites do not dominate the landscape. Ranking of the significance of natural landscape features was dependent on the prominence of the features as part of the setting of the district. It was felt that the profusion of landscape features identified by the Comstock Project made too little distinction between a highly significant natural landscape feature versus the rest of the natural landscape. Thus, only Sugarloaf and Mount Davidson were assigned the higher natural landmark rating of 2. The rest of the natural landscape was assigned a rating of 1. On the Landscape Sensitivity Map, natural landscapes are identified by an "n" followed by a 1 (lower) or 2 (higher) rating as appropriate.

Recommendations

As mentioned above, the degree of concern for the integrity of landscape features depends largely on which visual corridor is affected. Natural landmark features (Zone N2) should be protected from development. Though the rest of the natural landscape is rated N1, it should always be remembered that the natural setting of the Comstock is limited, and once developed it is not likely to ever return to a pristine condition.

ARCHAEOLOGY

Data Acquisition

Previously recorded archaeological data was acquired at the Nevada State Museum, Bureau of Land Management Carson City District Office, and the Department of Anthropology, University of Nevada, Reno. Archaeological projects are summarized in Appendix A. Archaeological sites are summarized in

Appendix B. Many of the architectural features recorded in building inventories of the Comstock also have archaeological components, but documentation of these features is not duplicated here.

Development of Archaeological Sensitivity Zones

Archaeological sensitivity zones have been rated on a scale of 1 to 5, with 1 having low sensitivity and 5 having high sensitivity. These ratings are based on three related characteristics of the archaeological resources. These characteristics are density, quality, and rarity. In general, the higher the density, quality and rarity of archaeological resources, the greater the sensitivity. A general model of the attributes of different sensitivity zones is presented in Table 1. A more detailed discussion of sensitivity and how it relates to site significance is in Hardesty et al. (1982:57-59). In the discussions that follow, a prefix of "H" before the numeric rating refers to a historic sensitivity zone. A prefix of "P" refers to a prehistoric sensitivity zone.

 Table 1. Characteristics of Archaeological Sensitivity Zones.

ZONE	SENSITIVITY	<u>RECORDED OR MODELED SITE DISTRIBUTION</u>		
		DENSITY	QUALITY	RARITY
1	Low (L)	L	L	L
2	Moderately Low (ML)	ML	ML	ML
3	Moderate (M)	M	M	M
4	Moderately High (MH)	MH	MH	MH
5	High (H)	H	H	H

Historic Archaeological Sensitivity

Historic archaeological sensitivity zones are based primarily on those developed by Hardesty et al. (1982, Map 2). The most significant modifications that have been made to the previous sensitivity scheme are the ratings of urban centers and cemeteries, both of which have been assigned the highest significance rating of H5 compared to the moderate rating of S3 previously assigned. The change in rating recognizes the wealth and complexity of historic archaeological resources within these areas. Two Master of Arts Theses projects utilizing historic archaeological data from the Comstock demonstrate the research potential of the urban zone. One of these projects concerns a Paiute encampment (Hattori 1975) and the other, which is in preparation, concerns the Chinese community in Virginia City (Donald L.

Hardesty, personal communication).

A study of historic sites recorded in the project area was used to expand the sensitivity map beyond the limits of the 1982 map and to serve as a basis for confirming or modifying the 1982 sensitivity mapping effort as appropriate. The distribution of formally recorded historic archaeological sites by sensitivity zone is summarized in Table 2. These sites are summarized in Appendix B.

Table 2. Summary of Previously Recorded Historic Site Types by Sensitivity Zone.

Site Type	Sensitivity Zone						Total
	H1	H2	H3	H4	H5	N/A*	
Cemetery	--	--	--	1	1	--	2
Mill	--	--	2	4	1	--	7
Mine	1	4	12	5	9	--	31
Monument	--	--	1	--	--	--	1
Pipeline	--	--	--	--	--	1	1
Placer	--	--	--	1	--	--	1
R.R. Station	--	--	--	1	--	--	1
Racetrack	--	--	--	1	--	--	1
Railroad	--	--	--	--	--	1	1
Ranch	--	--	--	1	--	--	1
Residence	--	1	--	3	1	--	5
Road	--	--	--	1	--	--	1
Station	--	--	1	1	--	--	2
Toll House	--	--	1	--	--	--	1
Town	--	--	1	1	2	--	4
Trestle	--	--	--	--	2	--	2
Total	1	5	18	20	16	2	62

* Site extends through multiple zones

As noted by Hardesty et al. (1982), there is a large gap between the quantities of archaeological sites found in the hinterland zones (H1 and H2) versus the intensively used zones. Relatively few archaeological sites are recorded in the most significant zone (H5) because small sites were recorded individually in zones H3 and H4, while extensive complexes of features and artifacts have been recorded as single sites in the H5 zone. Virginia City, for example, is recorded as a single site. The emphasis on mining sites versus habitation or other kinds of sites in the table of recorded archaeological sites is a result of the methods used in the BLM overview (Pendleton et al. 1982), which recorded features identified on topographic maps as part of a literature search. Only a very small percentage of the historic archaeological sites in the project area have been formally recorded.

Recommendations

In the hinterland (Sensitivity Zones H1 and H2), it should normally be possible for developers to avoid the scattered significant historic sites after their locations are identified by an archaeological survey. Most hinterland historic sites are sufficiently redundant and non-complex that potential adverse impacts due to development can be adequately mitigated by the level of recording done during archaeological survey although additional steps of archival documentation, testing, and excavation may be appropriate under some circumstances.

There is greater potential for finding increasingly complex and significant historic archaeological sites in progressively more sensitive zones (Zones H3 - H5). This represents a potential for increased costs in time and money to developers. A phased approach to the archaeological resources is recommended in these areas. The set of sensitivity maps plus detail maps in HCRS (1980b; 1980c) should first be consulted to gain a general idea of probable site densities and types, and hence archaeological survey costs. The proposed development area should then be surveyed for archaeological sites. If there are areas that have a high probability of significant buried archaeological materials, these areas should be avoided. If avoidance is not possible, these areas should be tested or monitored during construction as appropriate. In rare cases, additional excavation may be required to reduce adverse impacts to archaeological sites resulting from proposed development.

Prehistoric Archaeological Sensitivity

Archival review indicates that little additional archaeological data is available for the portion of the study area covered by the 1980 Comstock project and the follow-up archaeological survey (HCRS 1980b; Hardesty et al. 1982). The archaeological sensitivity map produced by Hardesty et al. (1982 Map 2) is a composite of both the historic and prehistoric periods. Unfortunately, prehistoric sensitivity is masked in this map by the dominant historic materials. Thus, with some modifications, the map of Native American Land Use produced by HCRS (1980b, Map 1) was used as the basis for the sensitivity map for the portion of the project area covered by HCRS. The archaeological and ethnographic model that serves as the basis for the Native American Land Use map is discussed in HCRS (1980b: 2-10). This model of Native American Land Use was extended to the northern end of the project area, and checked against the few recorded archaeological sites there.

From least to most sensitive, the prehistoric archaeological zones plotted on Map 3 are P1 to P5. Zone P1 is comprised of Native American Land Use Zone (NALUZ) A2, which is modeled as containing task sites for deer/mountain sheep hunting and pine nut gathering, and NALUZ A6, which the model suggests contains remains of seasonal mountain sheep hunting camps and task sites. Zone P2 was not used in this portion of the Comstock Historic District. Zone P3 corresponds to NALUZ A1, which the Comstock Model suggests contains evidence of seasonal camps for deer/mountain sheep hunting and pine nut gathering. Zone P4 is comprised of springs and NALUZ A3, which are areas of intensive multi-

purpose prehistoric utilization. Zone P5 consists of NALUZ zones A4, characterized by the presence of rock art sites, and A5, characterized by the presence of toolstone quarrying sites, both of which are rare in the project area.

Recorded prehistoric archaeological site types within these sensitivity zones are summarized in Table 3 and Appendix B. Table 3 shows that only 14 prehistoric sites have been recorded in the Storey County portion of the Comstock Historic District. The Comstock Model predicts the maximum number of camps will be found in Zone P3. This is confirmed, with 71.4 percent of all camps occurring in this zone. All task loci are also within Zone P3. Quarry and rock art sites are included in Zone P5 by definition. Zone P1, despite its large size, contains only four sites, one of which is an urban scavenging site not related to aboriginal resource procurement strategies. Although, with the exception of American Flat, there are not previously recorded prehistoric sites at the springs (Zone P4), it is highly probable that relatively complex sites occur at or near these locations. The archaeological survey documented in Appendix E was conducted to test this supposition. [Results of this to be included in final report]

Table 3. Summary of Prehistoric Site Types by Sensitivity Zone.

Site Type	Sensitivity Zone (Native American Land Use Zone)					Total
	P1 (A2,A6)	P2 (N/A)	P3 (A1)	P4 (Spring,A3)	P5 (A4,A5)	
Camp Site	2	-	5	-	-	7
Lithic Scatter	1	-	-	-	-	1
Quarry	-	-	-	-	1	1
Rock Art	-	-	-	-	1	1
Rock Shelter	1	-	-	-	-	1
Task Site	-	-	3	-	-	3
Total	4	0	8	0	2	14

Recommendations

If possible, developments in the few highly sensitive prehistoric areas (Sensitivity Zones P4 and P5) should be avoided. In the other areas, prehistoric sites are generally small enough that the degree of recording done during an archaeological survey is adequate mitigation of adverse impacts that may occur to the archaeological site as a result of development. Occasionally more significant sites will be found; they should be dealt with on a case-by-case basis in consultation with the NDHPA.

ARCHITECTURAL SENSITIVITY by Rebecca Bernstein

The distribution of architectural resources in the project area has been adequately recorded in previous surveys. Rebecca Bernstein (CHDC) prepared the Architectural Concentration and Integrity map from this data.

Architectural sensitivity zones are indicated on Map 4 with the prefix "A." The following number ranges from 1 to 6. A rating of A1 corresponds to the lowest concentration and integrity of historic architecture; A6 corresponds to the highest.

Recommendations

The ratings also reflect the type of consideration the CHDC will give a project area. Zone A1 will be considered marginal and will see liberal interpretation of CHDC regulations; strict application of the criteria for compatibility will be done in Zone A6.

Detailed maps showing blocks and lots of some areas are located in the CHDC office. These maps should be consulted for more precise definition of zones in Virginia City and Gold Hill.

MINERAL RESOURCES SENSITIVITY

The mineral resources sensitivity map is a reproduction of the *Preliminary Geologic Map of the Comstock Lode District, Nevada* (Calkins and Thayer 1945) which covers the main mineralized portions of the study area.

Recommendations

Surface mineralization may occur along the fault lines represented on the map. Subsurface mineral concentrations also tend to occur along faults. Placer deposits are found in canyons downslope of the lode deposits. These mineralized areas can be considered highly sensitive to future mining development. It is highly probable that there will be ongoing attempts to extract minerals from these areas.

SUMMARY OF PREVIOUS PLANNING DOCUMENTS

The purpose and recommendations of other planning documents relevant to the current project are summarized here. Recommendations regarding other topics such as economic development and tourism are not summarized. Recommendations excerpted from these documents are included in Appendix C.

THE COMSTOCK PROJECT, 1980

Purpose

Reporting on this project is divided into three volumes. *An Inventory of Historic and Natural Sites* (HCRS 1980a) contains inventory cards for every site, structure, or major landform over 40 years old within the National Historic Landmark boundary. This compilation was designed to serve as a guide to the historic resources on the Comstock, provide the foundation for defining sensitivity zones, provide a basic tool for preservation planning, and provide benchmark documentation to gauge change in the district.

Managing Archaeological Resources on the Comstock (HCRS 1980b) attempts to identify what kinds of archaeological sites are to be expected on the Comstock, where they are likely to be found, and how the significance of these sites should be assessed.

A Search for Balance; Conservation and Development on the Historic Comstock (HCRS 1980c) is the summary volume for the project. Its stated purpose is to attempt to explore methods of balancing preservation and development in a historically sensitive area. Recommendations summarized below and included in Appendix C are from this volume.

Recommendations

Planning for Development

The inventory cards and archaeological land use maps allow anyone involved in physical activities on the Comstock to be aware of protected sites. These sites are not rated by importance in the document. It suggests that importance must be determined by local and state authorities using the provided information (HCRS 1980c:48-49).

Archaeology

The archaeological zones developed in HCRS (1980b) should be developed into sensitivity zones for use as planning tools (HCRS 1980c:62-63).

Landforms

"Any change or destruction of these features could irreversibly change the character of the district and diminish its historic integrity.... Landforms need to be recognized in preservation planning in the same way as historic sites, by being inventoried and recorded so that planners can set priorities for preservation and measure future impact of change against some benchmark" (HCRS 1980c:64). A listing of significant landforms recognized by the 1980 project is in Appendix C.

ARCHAEOLOGICAL SURVEY OF THE VIRGINIA CITY NATIONAL HISTORIC LANDMARK, 1982

Purpose

The survey was conducted to test the documents-based "Comstock Model" with field studies.

Recommendations

Recommendations from this report are sufficiently succinct to reproduce in full:

1. The county commissioners should issue a special permit for development, mining, or other high impact projects proposed in archaeological zones with high sensitivity ratings. Before the permit is issued, a clearance report must be prepared by professionally qualified archaeologists. The report must demonstrate either that the impact area contains no significant archaeological resources or that appropriate mitigation procedures have been taken.

2. The boundaries of the Comstock Historic District should be changed to make the state and federal districts coincide, to eliminate most of the low significance hinterland zone, and to include lower Gold Canyon, the Carson River Valley, Long Valley-Lagomarsino Canyon, and possibly Washoe Valley (Hardesty et al. 1982).

COMSTOCK PROJECT 85

Purpose

This project produced three volumes. Volume 1 is an inventory of all structures in Virginia City. Volume 2 consists of case studies of selected city blocks. Volume 3 contains a history of Virginia City from 1900 to 1940 written as an amendment to the National Historic Landmark nomination. It also contains a revised Overall Economic Development Plan, a marketing plan, and a management plan for the historic district which promotes historic preservation, economic development and community values.

Recommendations

The report recommends establishing the same level and quality of documentation for the complete Comstock. Additional detailed case studies are recommended. More detailed historic documentation of selected buildings is also recommended (Koval et al. 1985 vol 1:9).

Recommendations, suggestions and observations which the authors intend to be understood as recommendations are scattered throughout volume 3. Portions of volume 3 primarily concerning historic preservation are included in Appendix C.

COMSTOCK PROJECT 87

Purpose

This project expands the geographic scope of detailed building recordation to the Divide, Gold Hill, Silver City and Dayton. It expands the cutoff date of significant contributing properties from 1900 to 1942 (Comstock Project 87 1987).

Recommendations

The 1900 to 1942 period on the Comstock is significant, and numerous structures exist that need to be considered as contributing to that significance.

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