

APPENDIX D
A PLAN TO MITIGATE ADVERSE IMPACTS TO ARCHAEOLOGICAL RESOURCES IN THE STOREY
COUNTY PORTION OF THE COMSTOCK HISTORIC DISTRICT
(Annotated Outline)



I. Function or Use

Historic Functions (enter categories from instructions)

Current Functions (enter categories from instructions)

Commerce: business
Domestic: single dwelling/secondary structure
Industry: extractive and processing
Government: courthouse : public works
Education: school

Commerce: business
Domestic: single family/secondary structure
Government: courthouse
Vacant/not in use
Work in progress

II. Description Transportation: railroad

Architectural Classification
(enter categories from instructions)

Materials (enter categories from instructions)

Mixed:
Late Victorian
Other: vernacular
mining & mill buildings
Late 19th Century & Early 20th
Century: Bungalow

foundation Brick
walls Brick
Wood
roof Wood
other Metal
Stone

Describe present and historic physical appearance.

Part I
reface

The intent of this nomination is to amend the Virginia City National Historic Landmark designation approved in 1961. Whereas the nomination form prepared more than twenty-five years ago described the historical significance of the Landmark District from 1859 to 1900, this amendment extends the period of significance to 1942, a date that serves as a critical benchmark in the mining history of the Comstock. Although inventories completed in the last decade have noted the potential significance of archaeological resources in the Landmark District, this amended nomination focuses on building resources and their immediate setting. It is not the purpose of this amendment to propose alterations to the existing federal Landmark District boundaries (certified in 1978): USGS Quad maps delineating these boundaries and citing UTM references accompany this nomination. This amendment will not repeat, but only build, and occasionally expand, on statements made in the physical description and history and significance sections of the 1961 nomination: new information about the pre-1900 era will be introduced only if it contributes to a better understanding of the 1900-1942 period of significance or when it accommodates recent updated National Register standards and guidelines, including those that accompany the 1986 revised National Register form. "Decline and Survival: Virginia City 1180-1945: by Allan Comp and "Mining History on the Comstock" by Elizabeth Beckham, both chapters in Project 85: Virginia City, Nevada (1985), are narrative histories supporting judgments made regarding the 1900 to 1942 period of historical significance and are appended to this nomination.

Summary

Located on the eastern slopes of the Virginia Range of the Sierra Nevada Mountains, the 14,750-acre Virginia City Historic Landmark District includes the five distinct communities of Virginia City, the Divide, Gold Hill, Silver City, and Dayton along with hundreds of acres of cultural landscape which, between 1859 and 1942, played an integral role in the history of mining on the Comstock. Between 1900 and 1942, a decline in the Comstock mining

ARCHAEOLOGICAL
RESEARCH
SERVICES, INC.

ASSOCIATES FOR CULTURAL RESOURCE STUDIES

AN ANNOTATED OUTLINE

for

AN ARCHAEOLOGICAL PRESERVATION PLAN
for the
STOREY COUNTY PORTION OF THE COMSTOCK HISTORIC DISTRICT

by

Thomas D. Burke

INTRODUCTION

The Storey County Commissioners (SCC) retained Archaeological Research Services, Inc. (ARS) to prepare an annotated outline for an Archaeological Preservation Plan (APP) for the Storey County portion of the Comstock Historic District (CHD). By adopting the APP, the SCC adopts and encourages the goal of preserving archaeological sites and their information on private land within the boundaries of the CHD in Storey County, although the SCC also extends this goal to privately held lands in Storey County outside the CHD. This is made possible by virtue of the County's participation as a Certified Local Government (CLG), by means of a cooperative arrangement with the Nevada State Historic Preservation Office/Division of Historic Preservation and Archaeology (SHPO) under terms of the *National Historic Preservation Act*, as amended (USC §§ 470-470w-6 and Public Law 96-515). Storey County, through its commissioners, is a qualified CLG because, in part, it has established an adequate and qualified historic preservation review commission (HPRC) comprising members of the Comstock Historic District Commission. However, the Storey County CLG (SCCLG) encompasses the Storey County portion of the CHD and beyond to the County's borders. Within this area, the SCCLG meets those minimum requirements for a CLG as defined in appropriate federal regulations (Code of Federal Regulations [CFR] Part 61.5[c], published in the *Federal Register*, Vol. 49, No. 73, pp. 14890-14906, April 13, 1984). As an approved CLG, the County has met the following minimum requirements: (1) enforce appropriate State or local legislation for designation and protection of historic properties; (2) establish an adequate and qualified historic preservation review commission; (3) maintain a system for the survey and inventory of historic properties; (4) provide for adequate public participation in the historic preservation program; and (5) satisfactorily perform responsibilities delegated to the CLG under the federal Act.

GOALS AND PURPOSES

By adopting this APP, the SCC adopts the primary goal of preserving archaeological sites and their information within the bounds of Storey County as they are found on private land. This is a particularly appropriate goal since the SCC recognizes the value of archaeological resources for their contribution to the public's knowledge of and appreciation for the past.

The purpose of the APP is to provide a means for the SCC to protect and preserve archaeological resources on private land within Storey County. This is appropriate for two primary reasons. First, significant archaeological resources have been inadvertently destroyed or seriously disturbed in the past without efforts to document and protect their important information. Second, while there are laws and regulations pertaining to such protection on federal and state (i.e., public) property, or for actions under the state or federal sponsorship, there has been no similar mechanism for recognizing the value of archaeological sites on private property or for ensuring their protection. This is of particular importance in Storey County, which has the highest percentage of private land in Nevada.

PROGRAM NEEDS

By adoption of this APP, and by means of existing authorities vested in the SCC as elected representatives of the public, the SCC recognizes its commitment to expand its existing historic preservation program to more effectively protect significant archaeological resources found on private land within Storey County. One objective is to institutionalize protection of archaeological sites within the existing County practices for prior review of projects and activities which could damage or destroy these sensitive cultural resources. Another objective is to expand and maintain a county-wide program of archaeological inventory and evaluation which will identify those significant resources meriting protection. A third objective is to recognize and, to some degree, codify threshold standards for significant archaeological properties within the SCC jurisdiction area. A fourth objective is to define standards for the personal qualifications and conduct of archaeological investigations occurring on private land and under purview of the SCC. A final objective is to protect significant archaeological sites through avoidance, stabilization, or data recovery.

MEANS AND WAYS

PRIOR REVIEW OF PERMIT APPLICATIONS BY THE SCC

The review of permit applications submitted to Storey County is one means of addressing potentially adverse impacts on important archaeological sites in the planning area. Consideration of permits allows for utilization of an existing administrative system, although the possibilities for working within such an administrative system are variable, as discussed here. At present, three possibilities are envisioned which enhance protection and preservation of archaeological resources on private land within Storey County. These entail various degrees of commitment in terms of organization, information flow, and financing on the part of the Storey County government, as well as variable financial and other commitments on the part of members of the general public who must seek approval of the SCC for certain activities.

Discussion of the three possibilities is prefaced by consideration of some work activities or components that would be essential under any review system. First, those activities need to be defined which could pose a threat to the condition of fragile, nonrenewable resources such as archaeological sites. These include, but are not necessarily limited to, the following ground disturbing activities: excavation, grading, dumping of materials, borrow pits, demolition of existing buildings or renovations involving subsurface disturbance in the vicinity of buildings, and replacement or upgrading of subsurface services such as water lines. Second, those ground disturbing activities which involve prior review and/or approval by the SCC must be entered into an information flow system and reach the attention of the SCC for its consideration.

EXAMPLE 1

This is the simplest alternative for prior review, although it lacks participation by qualified professionals during the review process and is limited to the CHD. Under this system, the Storey County Planning Commission (SCPC) reviews projects to determine if ground disturbance is involved. If there is project-related ground disturbance, the SCPC compares the project location with archaeological sensitivity maps and related documents prepared previously for the CHD (Hardesty et al. 1982; Reno 1990). If the proposed project occurs within the CHD, the SCPC would determine which sensitivity zone is being affected and would recommend action accordingly. For example, if the proposed project is in an area with an archaeological sensitivity ranking of 3 or greater, the SCPC should recommend that an inventory and evaluation be completed prior to or as a component of permit approval. However, and in all cases, the SCPC should evaluate the potential project effects and convey some form of recommendation to the SCC. The SCC would then make its own decision concerning permit approval. Under this system, the responsibility for fulfilling permit conditions related to archaeological resources remains with the permit applicant.

EXAMPLE 2

This example develops participation by a professional archaeologist (here referred to as the County Archaeologist, or CA) in permit review and recommendations, as a member of the Storey County Planning Commission. The proposal entails increased cost to the County for a staff position, clerical assistance, office space and related materials, and other costs for the conduct of archaeological work. All permits would be examined to determine whether ground disturbance was involved and the potential sensitivity of the permit area. If a sensitive zone is involved, the County Archaeologist would make a recommendation through the SCPC to the SCC requesting a period of time (a minimum of 60 days is recommended) to accomplish a field investigation and prepare a report. The SCC would then act on the request. If granted, the CA would complete the work and return a report concerning the significance of any archaeological sites and recommendations (with justifications) for additional investigation, if any. The report and recommendations would be forwarded to the SCC for further action, if any, including a stipulation for additional time to complete necessary archaeological work (e.g., testing, data recovery) prior to allowing permissible work to proceed.

There are advantages to this system. First, permit applicants do not necessarily have to bear any financial responsibility for the archaeological investigations, although they might choose to do so. However, permit applicants are faced with possible time delays. Second, development of the position of County Archaeologist would permit more informed decision making during the review process and otherwise. In particular, the CA would be able to make informed decisions about sensitivity in areas outside the CHD boundary. Third, any time the CA has which is not taken by review or fieldwork related to permit review could be invested in furthering the other objectives of the SCCLG, especially in inventorying and evaluating archaeological sites. This

person could seek additional grants or coordinate volunteer assistance to expand an on-going program of inventory and evaluation.

One potential difficulty under this example concerns the granting of access to a piece of property by the permit applicant or the applicant's representative for the purposes of completing the archaeological investigation. In such cases where access is denied, the SCC could refuse to issue the permit or could issue the permit with restrictions on the locations or types of activities to be allowed, based on knowledge of known resources or the suspected location of resources in sensitive areas.

It is also important to remember that archaeological artifacts recovered from private land remain the property of the landowner. In keeping with generally accepted policies concerning preservation of artifacts from archaeological sites, the SCC should adopt a policy encouraging curation of artifacts at the Nevada State Museum, Carson City, or a similar approved repository such as the Anthropology Museum, Department of Anthropology, University of Nevada, Reno. Private land owners should be encouraged to waive ownership in writing of collected archaeological specimens on a voluntary basis. Alternatively, and as recognized by the permit applicant's written acceptance of permit conditions stipulated by the SCC, a permit condition could serve as a written waiver by the applicant for ownership of the artifacts. Or, if the land owner wishes to retain the artifacts, the permit should be conditioned to include a stipulation that the permit applicant agrees to allow release of the artifacts for a specified period of time in order to complete analysis; artifacts would be returned at the end of that time period.

EXAMPLE 3

This example includes components of the first two, but places greater responsibility (including financial) on the permit applicant while providing more time for the CA to conduct activities other than review, particularly a continued program of inventory and evaluation within Storey County. Under this proposed system, the CA is a member of the SCPC and makes recommendations through that body to the SCC concerning the archaeological sensitivity of an area involved in a permit application. The recommendations include statements as to the need for and type of archaeological investigation. The SCC would then choose whether to make these recommendations from the SCPC a permit requirement. These requirements would be made the obligation of the permit applicant who would secure the services of a third party archaeological consultant meeting standards contained in this APP. The consultant would complete the archaeological investigation and submit a final report to the SCPC which would review the document and consider any recommendations within the report for further work. The CA, through the SCPC, would make recommendations to the SCC concerning acceptance of the report and the need for any further archaeological investigations which might then be encumbered as part of the permit conditions.

As noted previously, this proposal would also entail costs to Storey County, in accordance with the description in Example 2. However, under Example 3 the CA should have more time to organize and accomplish systematic

archaeological investigations of the county, rather than the "hit or miss" effort that would be prompted by permit applications.

SUMMARY

The current administrative system of Storey County government allows for increased protection and preservation of archaeological remains through the permit application review system. The types of activities which endanger archaeological sites need to be recognized and steps need to be taken to try to preserve these cultural resources. Three options are outlined involving variable degrees of financial commitment on the part of the SCC and permit applicants, although other systems probably could be developed. The hiring of a County Archaeologist is encouraged.

STANDARDS FOR THE ARCHAEOLOGICAL PRESERVATION PLAN

PROFESSIONAL QUALIFICATIONS

Professional qualifications standards for persons conducting archaeological activities pursuant to terms of this APP are presented here. In general, qualified, trained individuals must be engaged to identify, evaluate, register and treat historic properties on the within Storey County. Professional qualifications have been adopted from the the federal Secretary of the Interior to help ensure that appropriate kinds of knowledge and experience are brought to achieve timely, cost effective compliance with the APP.

Archaeology. Minimum professional qualifications are:

1. A graduate degree in archaeology, anthropology or a closely related field plus:
 - a. At least one year of full-time professional experience or equivalent specialized training in archaeological research, administration or management; and
 - b. At least four months of supervised field and analytic experience in general North American archaeology; and
 - c. Demonstrated ability to carry research to completion; and one or both of the following:
 - (1) In the field of prehistoric archaeology, a professional shall have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources of the prehistoric period;
 - (2) In the field of historic archaeology, a professional shall have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources of the historic period.

Any archaeologist or third party contractor must have, in addition to qualifications expressed above, a current permit from the Nevada State Museum.

WORK STANDARDS

Inventory Standards

An inventory will identify properties to a degree sufficient to judge significance. This process involves locating and evaluating cultural resources. Efforts to locate and evaluate historic properties must be systematic, and evaluations must be related to appropriate historic contexts. If located properties are considered to be outside the range of extant historic contexts, appropriate contexts and ensuing evaluations must be developed within any report prepared by or submitted to the SCC using the Secretary of the Interior's standards and guidelines for preservation planning, unless superseded here by other standards and guidelines.

Inventories must meet the Secretary's standards for identification and evaluation. In Nevada, the SHPO can be consulted in regard to activities that might affect cultural resources. One federal agency, the Nevada State Office, Bureau of Land Management, has issued written guidelines for the conduct of archaeological inventories (*Cultural Resource Inventory Guidelines*, Fourth Edition, January 1989). Comparable guidelines have been developed for by the SHPO for non-federal projects such as might occur within Storey County under terms of this APP. Appropriate portions of the BLM/SHPO guidelines are incorporated here for application on the Comstock Historic District, as described below. If the SHPO subsequently adopts guidelines with different requirements, the new guidelines should be substituted.

Methods and Report Standards for Archaeological Investigations Within the CHD

For all projects conducted in accordance with this APP, a Class III inventory shall be conducted. A Class III inventory is conducted by professionals and is intended to locate and record all cultural resources having surface or exposed-profile indications within the area of potential effect (APE). The inventory must be conducted on foot within the entire APE by means of parallel transects separated by no more than 30 meters. Wider intervals may be acceptable under some circumstances with prior approval of the SCC. Surface visibility in the APE must be at least 70 percent (that is, snow or other materials obscuring the surface must not exceed 30 percent). The Class III inventory must include a records search, must relocate and evaluate previously recorded properties, must include preparation of accurate site records for all newly recorded properties, must update site records on all previously recorded properties, and must result in an inventory report acceptable to the SCC.

The inventory report shall contain:

General Information: This section identifies, locates and describes the proposed land use motivating the inventory. The APE and the inventory area

relative to the APE must be defined. Summaries should be provided of field techniques, crew size, crew membership and dates of field work. Any problems relating to the reliability of the inventory should be identified.

Environmental Information: This section provides a brief summary of environmental characteristics in the inventory area and should discuss any factors which might have prevented identification of cultural properties. Any environmental factors related to establishing significance of cultural resources should be identified. This section should not be limited to a general regional summary, but should focus on description of local environmental characteristics relevant to the inventory.

Field Methods: This section describes the strategy used to locate and evaluate cultural resources as implemented in the field. Deviations from any established inventory standards must be defined. The field methods section should include discussion of the likelihood that all cultural properties in the inventory area were located and assess the potential for the presence of undiscovered buried cultural properties. Locations of any subsurface tests must be discussed and shown on appropriate site maps.

Results: Cultural resources found during the inventory should be described as to location, environmental setting, extent, depth, condition, cultural or historic affiliation, chronology and function. The significance of each resource must be related to the National Register of Historic Places criteria for integrity and significance, including reference to specific historic contexts relating to the CHD (Hardesty et al. 1982, Reno 1990). All properties considered eligible for the NRHP must be identified and discussed in the report text, including justifications for NRHP inclusion using the historic contexts. For each eligible property, the report must include a finding of effect. Subsurface investigations may be required during the inventory phase; results should be reported thoroughly.

Summary: The results of the inventory should be discussed in terms of expectations with regard to the regional data base, significant research questions, the need for further investigations and the likely effects from the proposed land use. For archaeological sites, the report must document whether the historic property is valuable only for its potential for research and whether this value can be substantially preserved through the conduct of appropriate research.

Conclusions: This section identifies data limitations, significant properties, effects on significant properties and recommendations to mitigate adverse effects.

Maps, Graphics and Records: An original map or maps showing the entire project area, the APE, the area inventoried and locations of all resources located or relocated will be included with the report. An appropriate complete site record will be included for each property located or relocated. Other graphics to illustrate the characteristics of properties and effects relevant to significance determinations and mitigation recommendations will be included as needed. Negatives for all photographs used in the report must be included.

After submission of the inventory report to the SCC, the SCC evaluates the report and requests any necessary changes in the document. If no further work is required by the SCC, the project may proceed. Under some circumstances, and based on the recommendation of the SCC, it may be necessary to conduct limited subsurface investigations to complete evaluation.

All cultural resources will be recorded on Intermountain Antiquities Computer System (IMACS) site record forms, unless the SHPO specifies an alternative form. IMACS short forms should be used for small sites (i.e., 20 artifacts or less) unless the site is considered eligible for the NRHP.

Evaluation Standards

As noted elsewhere in this APP, the inventory process must result in sufficient information to judge significance of each property. Evaluation constitutes those efforts necessary to judge significance. Significance in American history, architecture, archaeology and culture is present in districts, sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association and:

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of person significant in our past; or
- C. that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history.

As noted elsewhere in this APP, there are documents prepared for the CHD which serve to identify historic contexts within which resources may be evaluated (Hardesty et al. 1982, Reno 1990). However, those resources cannot necessarily be considered comprehensive, especially for areas outside the CHD proper. Therefore, available federal guidelines regarding application of the National Register evaluation criteria (*National Register Bulletin 15*, "Guidelines for Applying the National Register Criteria for Evaluation," June 1, 1982) are adopted by reference for guidance in other situations. These are paraphrased in the following brief discussion of historic contexts. The Secretary's standards for preservation planning require development of an appropriate historic context which is "an organizational format that groups information about related historic properties, based on a theme (also referred to as a concept), geographic limits, and chronological period. The scale of historic contexts is highly variable with respect to geography and several contexts may overlap. Portions of comprehensive state plans have been

developed in Nevada and include Lyneis (1982) and Hardesty (1986), which are discussed below. As noted previously, the primary documents specifically regarding archaeological and other cultural resources on the Comstock Historic District include HCRS (1980), Hardesty et al. (1982) and Reno (1990).

Curation Standards

The SCC should coordinate with museums and universities, among others, on historic preservation activities, plans and projects. In general, this means that the Storey County Commissioners will need to initiate some actions such as arrangements for curation.

A primary concern of the SCC is to ensure that adequate space is made available to store historic preservation documents, artifacts and other materials in secure, fire-safe locations sufficient for their perpetual care. At present, it is not proposed that the SCC undertake to develop such a facility, since an appropriate and adequate facility would likely be very expensive to set up and maintain. However, it is proposed that the SCC make available adequate working space for historic preservation staff to conduct work under terms of the APP.

Care of Materials

Non-Artifactual Materials

The historic preservation staff of the SCC should be provided adequate space for all reports, studies, maps, plans and other documentation resulting from historic preservation activities or necessary for the on-going conduct of historic preservation responsibilities. This documentation should not include copies of archaeological site forms or other information about site locations that may be subject to vandalism unless the SCC historic preservation staff includes qualified professionals in the discipline using the documents.

Copies of "formal" reports, studies and plans making a "substantial contribution" to historic preservation knowledge or that are of general public interest should be distributed to various state and local groups. For the SCC, the "must" list for recipients of historic preservation reports includes the CHDC and the SHPO, who ultimately will curate such reports in-house or will forward them to the Nevada State Museum, Carson City. Copies submitted to the SHPO must include all site record forms. However, copies of reports distributed to the general public or to any other agency must not include specific archaeological site location information unless that agency has a need to know and/or has qualified professional staff.

If photographs and/or negatives are to be curated, they should be handled and stored properly, including the use of acid-free photographic paper and storage envelopes when necessary. Photographic records associated with archaeological investigations should be submitted for curation with artifacts and other specimens. The National Park Service or SHPO can provide more information about photographic preservation.

Archaeological site records should be available only on a need-to-know basis. Procedures for decisions regarding dissemination of potentially sensitive information during any solicitation of public concerns should be developed in consultation with the CHDC and the SHPO. The archaeological site records will be curated at the Nevada State Museum, Carson City, Nevada, and will be made accessible to qualified persons under criteria established by the museum. Archaeological or other sensitive site locations may become known to the SCC historic preservation staff, as well as the SCC and SCPC members as a result of reviewing either in house (i.e., the CA) reports or those received from qualified third party archaeologists acting as consultants. Any maps or other specific site location information resulting from such studies and included in reports or other documents filed with the SCC should be treated as confidential; should be kept in secure, locked cabinets; and should be accessible only to persons with a defined need-to-know.

Artifactual Materials.

This section addresses the treatment of remains recovered from archaeological sites during removal, analysis and curation.

Artifacts recovered during work phases identified in the APP or under terms of any other treatment procedures within the jurisdiction of the SCC and occurring under auspices of this APP shall be handled according to standard procedures established for the discipline. However, neither Storey County nor the SCC currently has a certified repository for the permanent curation of artifacts or other physical remains taken from archaeological sites. Artifacts and other physical remains should be curated at the Nevada State Museum, Carson City, Nevada, or a similar acceptable repository. This agency provides permanent curation at a rate of \$540.00 per cubic foot (as of May 1989). Either the permit applicant or the SCC must pay for all curation of artifacts and specimens recovered under requirements of the APP. A qualified private contractor must hold a valid permit from the Nevada State Museum to ensure proper handling and cataloging of materials in order to have the materials accepted.

If a curatorial facility is added to the proposed mining museum, it will be possible to collect larger archaeological samples than would be feasible to send to the Nevada State Museum. These items would be available for local interpretive display purposes. Before deciding to include a curatorial facility, the SCC should thoroughly investigate the responsibilities incumbent on constructing and maintaining a curatorial facility (U.S. Department of the Interior 1980).

Archaeological remains shall be appropriately documented as to site location and other provenience, if applicable (e.g., test unit, level). Recovered items will be organized and labeled so as to maintain this provenience during processes of recovery, transportation, analysis and curation. A complete catalog of remains recovered during any type of project shall be submitted with the report of findings; the catalog shall be appropriately descriptive and, as necessary, reflect analytical results. During cataloging and preparation for analysis, standard procedures shall guide

treatment of perishable and non-perishable artifact categories and samples. All results of analysis will be included in the report of findings.

Human Remains

All human remains encountered on private land during any phase of archaeological investigation conducted pursuant to this APP shall be handled in accordance with appropriate Nevada laws and regulations.

WORKS CITED

Advisory Council on Historic Preservation

- 1980 Treatment of Archaeological Properties: A Handbook (draft).
Washington, D.C.
- 1989 Public Participation in Section 106 Review: A Guide for Agency
Officials. Washington, D.C.

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- 1982 An Archaeological Element for the Nevada Historic Preservation Plan.
Nevada Division of Historic Preservation and Archaeology, Carson
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Reno, R. L.

- 1990 Sensitivity Study of the Storey County Portion of the Comstock
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D.C.
- 1989 Cultural Resource Inventory General Guidelines, Fourth Edition.
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