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December 20, 2008

New Comstock EIS Project Manager  
BLM – Carson City District – Sierra Front Field Office  
5665 Morgan Mill Road  
Carson City, Nevada 89701

Dear Project Manager:

I have been associated with the Comstock for most of my life. I visited it many times with my parents during the 1950s and 1960s, did my first historical archaeological work here in 1970, and have been involved in the history of the place ever since. I have worked on or advised numerous professional and volunteer archaeological and preservation projects here and have served on the Comstock Historic District Commission. In recent years I have coordinated volunteer efforts related to reconstructing the historic Silver City Schoolhouse Community Center.

Based on my knowledge of the national, state, and local significance of the Virginia City National Landmark District and on my experience in evaluating the magnitude of potential project effects from the perspective of the NEPA process and implementation of the National Historic Preservation Act, I have grave concerns about the New Comstock Wind Energy Project as it is presently designed.

1: The Virginia City National Historic Landmark is of unique importance in Nevada history, the mining history of the American West, and the course of settlement of the western frontier. It is difficult to overemphasize the significance of the Comstock. Eminent Nevada historian Russell Elliott expressed this importance succinctly. He felt that the history of the Comstock *is* the history of Nevada from 1859 to 1880. Regarding the relatively few national landmarks in the country (Nevada has seven, most of which are very small), according to the National Park Service, “National Historic Landmarks are exceptional places. They form a common bond between all Americans. While there are many historic places across the nation, only a small number have meaning to all Americans – these we call our National Historic Landmarks.” What this means for the present process is that analyses and evaluations that would suffice for ordinary mining districts or other places are not adequate here. There is far more at stake. This concern is basic to all of my other more specific concerns.

2: The Virginia City National Historic Landmark is already in a perilous condition. Due to previous development projects, particularly open pit mining but also a variety of other changes, the landmark is presently rated as “threatened” by the National Park Service National Historic Landmarks Program. This means that a project that degrades the integrity of Design, Setting, Materials, Feeling, and Association of the landmark must be evaluated in relation to the cumulative prior impacts. Mitigation measures that work in other places may not work here.

3: The EIS contractor must have prior experience in evaluating impacts of all kinds to National Landmarks or National Parks. BLM should contact references given by possible contractors within the agencies responsible for prior EIS projects to ensure that the individuals responsible for the present project have produced satisfactory results in the past.

4: Visual impacts must be evaluated from many vistas within and on the principal entries into the National Landmark. Mining sites, support communities, cemeteries, and historic transportation routes cover a large and topographically complex area. As presently designed, the project will be highly visible from the principal entries into the area by visitors, including the ridge south of Silver City, Occidental Grade (now the Truck Route), the Divide, Geiger Summit, the highway in Gold Canyon just above Devils Gate, and the Virginia & Truckee Railroad particularly in the vicinity of Tunnel 2, and Fort Homestead. It will also be highly visible from most of Gold Hill, the Combination Shaft, and the very highly visited complex of cemeteries northeast of Virginia City. Due to this complexity and the overriding importance of visual impacts, the study will likely require evaluation from considerably more vantage points than would be required for a study in other circumstances.

5: The nature of the proposed project components makes it an intrusion into the historic landscape that is both qualitatively and quantitatively different than anything that has happened before. In my travels through wind farm developments I have found myself completely enthralled by the things to the extent that my driving is to say the least, erratic. They visually overwhelm any landscape they are placed on.

The sheer size of the turbines dwarfs in scale all previous human constructions. This makes it difficult for a visitor to be impressed by the historic significance of the buildings, headframes, and other historic elements of the district.

The design and materials of the turbines are ultra-modern. They contrast starkly with everything else that has ever been installed in the area. This makes the proposed project different from open pit mines (at least in outlying parts of the landmark), buildings, or smaller structures. All of these have some sort of precedent in the area, and can be made to blend in with the historic elements of the landmark

The turbine blades move. This attracts attention in a way that a stationary structure does not. In effect it increases their prominence far beyond what is indicated by a still mockup.

The turbines form a series of repetitive elements, homogenizing the visual landscape.

The turbines are on ridge tops, inherently the most visually intrusive of all possible locations. In the past, the distinctive skyline with Sun Mountain and the city clinging to its sides was a prominent landmark and guide from the historic approaches to the Comstock along the Carson River Route of the California Trail. This will be replaced by a skyline of wind turbines.

The major roads which will be built or improved to build and service the turbines are on ridge tops. This is in an extremely visible location, altering landscape features which provide the setting for the historic resources in the area. The impact goes beyond the flattening effect of the roads themselves. In the steep and rocky terrain extremely large berms will be formed and boulder fall will traverse the slopes and accumulate all the way to drainage bottoms in some areas.

6. If wind energy proves viable here, it is likely that additional projects will be proposed surrounding the present one. The analysis should consider the cumulative impacts from an envisioned maximum build-out regardless of the specific plans of the current developer. Among my concerns regarding the Virginia City National Historic Landmark is that once its integrity is degraded by construction of the first wind farm, the smaller incremental degradations of subsequent projects will be accepted piecemeal, ultimately ending up with an unplanned but much greater impact.

7. The project is partially within the state Comstock Historic District. The proponent will need to follow the published design guidelines for construction within the district. My concern is that it defeats the intent of that district if BLM should allow construction of facilities that do not meet these guidelines in areas that are immediately adjacent to the state historic district, but that are still extremely visible from key visual corridors of the district. Here it is important to remember that everyone who resides or has a business in the Comstock Historic District has paid, often a great deal, to help promote the continuing survival of the Comstock as a historic area. Construction and maintenance costs are greater and people are restricted on the kinds of designs they can construct. They would not be allowed to build a small wind generator on their property but every day would gaze upward at the wind turbines on the ridge top. I am afraid that the inequity of this situation would undermine support for the Comstock Historic District. If the populace were to give up on the state district, the adverse impact on the Virginia City National Landmark would be catastrophic.

8. Presently there is a disturbing lack of project alternatives. The proponent claims that the only viable location is where he presently proposes it. However, the only meteorological towers that either exist or are proposed are within the project footprint. Meteorological information should also be gathered to determine whether an alternative that moves the project eastward far enough to be out of sight of the heavily visited parts of the Virginia City National Landmark is viable. Such an alternative would satisfy all of the concerns I have expressed thus far.

9. Northern Nevada in general and the communities of Virginia City, Gold Hill, and Dayton in particular rely heavily on tourism to support the economy. The EIS must include a cost-benefit analysis of the power income provided by the wind farm compared with the possible loss of tourist income should a significant proportion of potential visitors decide that the Comstock is no longer authentic enough to warrant a visit. The Comstock is a popular day-trip for visitors from

the Truckee Meadows, Lake Tahoe, and Carson City as well as a scheduled stop on many bus tours through the region. Therefore, not only the potential income loss to local businesses must be considered, but also the effect on surrounding areas should one of the major tourist destinations in the region be degraded. It must also be considered that major taxpayer funds have recently been committed to enhancing the Comstock as a tourist destination by reconstruction of the V&T Railroad.

I have one concern that does not relate to the Historic Landmark. If the project is built, what happens if the company fails or moves on to another technology in a few years? Will the BLM require a demolition bond so the taxpayers are not stuck with trying to dispose of these immense objects or with watching them gradually fall apart for the rest of our lives?

Finally, I live in Silver City, which is a dark-sky community. We still have reasonably dark night skies and go to great lengths locally to preserve them despite many a stumble. Therefore I am concerned about adding a row of flashing red lights to our western skyline.

If you have any questions, please do not hesitate to contact me. Many people have asked me about my concerns regarding the project, so I will be distributing this document freely.

Sincerely,

Ron Reno