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July 26, 2021

**RECEIVED**

**JUL 29 2021**

**STATE HISTORIC  
PRESERVATION OFFICE**

Dear Ms. Cloud,

Attached please find the rehabilitation plan for the Comstock Cemetery Foundation's visitor center.

As you know we have asked for a CCCHP board review of two of the items proposed in our plan. We felt that perhaps a written background of the history, rationale, and design foundations of the plan would be helpful for all involved.

It is such a wonderful interpretative opportunity for us to education the public on the four cycles of salvage and reuse. Afterall, it became an architectural style on the Comstock defining the character of numerous historic structures.

This significant style has not been widely researched or given the attention it deserves. We hope that by sharing the research, and details of salvage and reuse on the Comstock it will help us all better select what is, and what is not appropriate for this unique structure.

Should you want an executive summary and/or a PowerPoint overview for the board review, just let us know.

Sincerely,

Candace Wheeler  
Executive Director  
Comstock Cemetery Foundation

Ross Bevans  
President  
Comstock Cemetery Foundation

## Introduction

The Comstock Cemetery Foundation (CCF) has worked with the *Secretary of the Interiors Standards for the Treatment of Historic Landscapes (Standards)* for over twenty years. As we applied our analytical skills and experience to the rehabilitation design for the small (250 square foot) miner's cabin we discovered our past expertise has served us well. The cabin has more in common with our historic burial grounds than one might imagine. Those commonalities are in sync with areas that typically give preservationists numerous frustrations: introduction of modern features, changes over time, alterations done by numerous individuals in multiple time periods with a multitude of inappropriate materials. We were truly at home. A headache for most, but for the CCF a gift.

The purpose of this brief is to detail the causal factors contributing to the rehabilitation design. The CCF has a practice of "checking" itself by seeking out experts prior to formalizing plans. Due to the uniqueness of the cabin, we reached out to experts in the *Standards*, interior design, architectural history and structural engineering fields. In addition, the CCF worked with elementary school teachers on interpretation plans.

The best advice we received was from an expert in the *Standards*: "Don't do this structure a disservice by ignoring its architectural and cultural characteristics just because it's not a sexy story. And, remember, you are working with *guidelines* for a reason-structures are unique-let them guide your plan, not define it."

## Mission

To tell the stories of Comstock mining, residential living, and cemeteries through the rehabilitation process, the use of architectural features, and decorative features.

## Miner's Cabin Context

The birth of the miner's cabin most likely occurred during the 1870s in a small community on the Comstock known as American Flat. This area was sparsely populated with farms, residential cabins, and mining. The cabin's board and batten construction was the original structure, covered over at a later date. The CCF created a "window" on the side of the house so visitors could see the first construct of the cabin even though the exterior siding had been altered numerous times.



The cabin was home to a family unit. By the 1870s many families lived on the Comstock in similar housing (Fleiss). The original wood burning stove chimney opening can still be seen on the side of the cabin. The initial floor was dirt, the ceiling was open to the rafters. One roughhewn wall was added during this time period for privacy with evidence of four different wallpaper layers. A roughhewn floor was added at some point during its use in American Flat.

When the cabin was built, the Comstock was a busy place with a population nearing 20,000 people and hundreds of active mining operations. New lumber, supplies, and building materials streamed into the area in record amounts (Lord).

As is the nature of many a mining camp, fortunes would rise and fall. The population would dramatically drop around the 1890s and continue until well below 1000 people lived on the Comstock. American Flat would be nearly uninhabited by 1890. Many structures were abandoned and left to decay. This is the start of a significant cultural change in people's relationship to architectural structures: *Salvage and Reuse*.

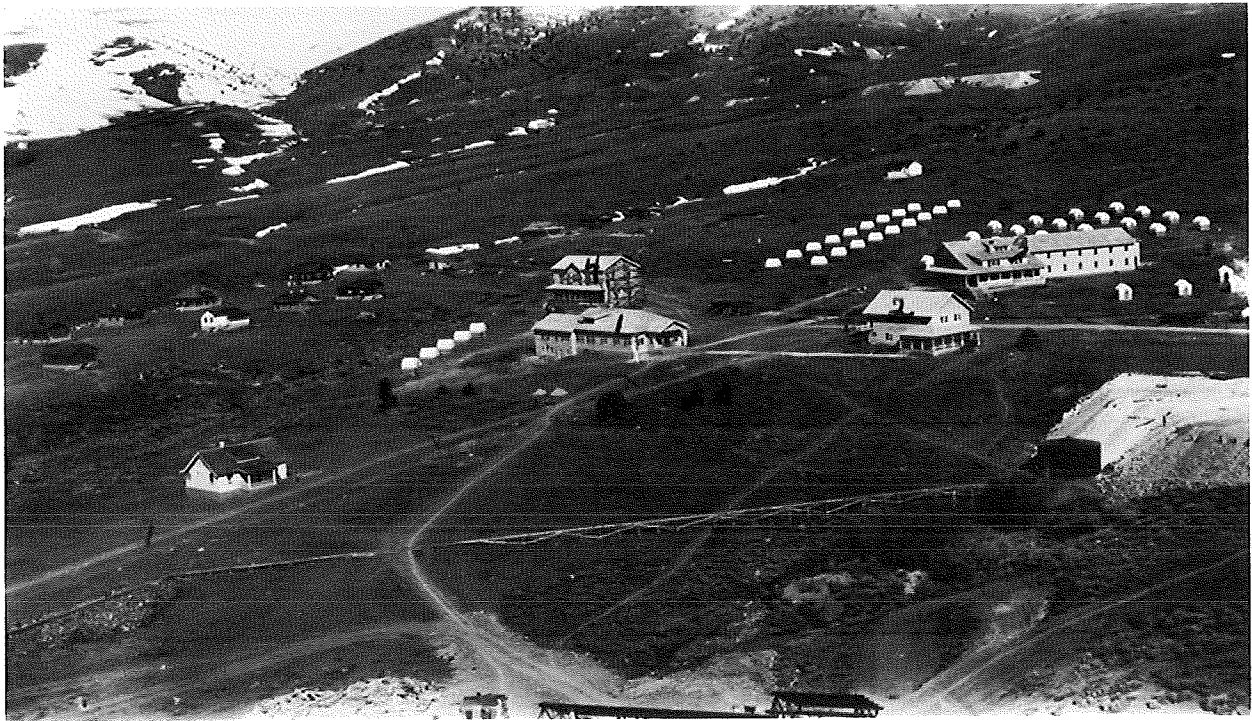
While salvage and reuse may be a preservationist's nightmare, it represents significant times of varying architectural style and character both in what was taken *from* and what was added *to* the Comstock structures. Over the years different social issues drove the practice of salvage and reuse: dereliction, the depression, world war, and entertainment. Supply lines slowed dramatically driving the impulse to liberate architectural features for reuse. The miner's cabin witnessed all four cycles. Salvage and reuse on the Comstock has not been widely explored, researched, and/or shared with the public.

The cabin was born in American Flat, and may have spent a decade or longer unoccupied. Much like the cemetery, its wood degraded, stone fell away, windows broke, it sagged, became derelict. During what should have been its prime, it fell victim to scavengers that removed bits and pieces, until a much more aggressive vulture came to town, swept it off its feet to serve the wheels of industry. In its middle age, a horse driven carriage arrived and whisked it up a steep winding hill to a new home which offered continuous make-overs. Finally, as it neared its old age, it found a new place to rest in the local cemetery-the end of a life's journey.

### *The Derelict*

Mining attempts were made in American Flat where the cabin still resided. In the 1910s and 1920s mining engineers Roy Hardy and Alex Wise sought to take advantage of a new technology to extract gold and silver from ore. The Merger Mill was constructed in 1922. Houses, building materials, mining equipment, and other supplies were transported to American Flat for mill workers. During this time the cabin was conscripted as company housing for local miners. It was spiffed up by the salvage and reuse of building materials from surrounding structures. It was given a new floor (second) and some new windows fitted from other structures.

The mill was short-lived, closing in 1926. All of the machinery and items of value from the mill site were sold off, leaving only concrete ruins. Two years later, no doubt after further deterioration, the miner's cabin would make its second journey. A journey that would result in the loss of some architectural features and the addition of new, albeit salvaged, enhancements.



### *The Depression*

In 1928 nearing the start of the Great Depression, George Wilson, local teamster, uprooted four former American Mill employee houses and relocated them to B Street as rental properties. The cabin was one of the four and it was subjected to a serious makeover using salvaged finery from other structures; another floor, a paneled (wainscoting) ceiling, a few windows, a door from here and there, and a salvaged roof. The depression heralded in more salvaging opportunities which also became less covert. Residents would buy abandoned property for a few pennies, and then strip it of its features for reuse. Anything leftover was burnt to keep warm during the winter months. The cabin benefited from these and other salvage opportunities, filling its basket with a wealth of different and varied architectural materials spirited away from other structures. As we move toward the 1940s salvage and reuse became sanctioned, encouraged, and even patriotic.

### *The War*

On October 8, 1942 the United States government announced its "Scrap for Victory" program to support the metal needs of World War II. The cannibalization of the Comstock began in earnest. The cabin was occupied but no doubt benefited from any salvage materials that did not go to the war effort. Nearly all the mining and



milling structures were obliterated. Metal roofs, machinery parts, and scrap iron were all collected and donated to help the war effort.



Poster for Salvage and Reuse; Library of Congress

### *Recreation-Salvage for Family Fun*

In the 1950-70s a different type of thief in the night appeared - the recreational collector. Many Nevada families considered salvaging, bottle collecting, and architectural *acquisition* part of their family recreation (Nygren). The Comstock had a reputation for being rich in all of these artifacts. In addition, the Comstock had a small population (fewer watching eyes), limited police and little in the way of legal protections. It was ripe for the picking, and the picking, and more picking. Of course, George Wilson's family still owned the rental properties and they were geographically well located to get the best picks first and the cabin was the beneficiary.

Salvage and reuse has been an unofficial building method employed on the Comstock for over 130 years. It has achieved an architectural character all its own. And, practicality has played a large role in its use as a method to save money, even stay warm. The use of architectural materials from other buildings has long been considered a down grading of the structures' context, its very integrity. For the mining cabin, the opposite is true. Salvage and reuse is its keystone and evolutionary character defining feature. This is the foundation of the cabin's built environment and it must be maintained within the rehabilitation plan in order to maintain visual compatibility.

*What the people are within, the buildings express without.*  
-Louis Sullivan, American Architect

## Structure History

Ron Gallagher, prior owner and landlord, documented names of the renters, and work on the cabin. Three other similar houses were owned by his family during his childhood up through the move to the cemetery. There are two local handymen, one still living, who periodically did work on the rental properties. They were interviewed in 2018. Ron's family managed the property for nearly 90 years, and he took over direct management in the 1980s following his father's death. Mr. Gallagher is still living and completed a full oral history, numerous walk throughs, and continues to consult on the project. While the CCF has detailed each main area of the cabin and its associated treatment plan, we will just address the highlights in this document.

It is more than profound and cannot be stated more definitively than to say, salvage and rescue of other architectural features, are mandatory for this rehabilitation plan. Almost 95% of the cabin's structure is, or has been built using materials from other buildings. That is significant and represents the single most important character defining feature. In order to be compatible in use, and preserve the cabin's cultural and architectural values the rehabilitation plan must include salvage and reuse.

The salvage and reuse of materials will be focused in a way to complement the historic nature of the cabin; residential living; mining on the Comstock; and cemetery lands. For example, it would not be appropriate to integrate a collection of bottles from 1789 Boston as part of the cabin's wall. But to use a barn door to secure more space, or a savaged mining pulley to hold a plant would be appropriate.

We are conscious of the need offset any concerns about "misleading the public" so, we will explain, we will educate, we will interpret.

## Overview by Areas

There are detailed write-ups available by room which includes the treatment plans. Below is a short overview of each area, the evolution of alterations, and the epidemic of salvaged and reused architectural features. We have identified materials, most salvaged from other structures, and documented all spatial relationships.

### *Exterior of the cabin*

- Siding is a mix of wood from at least two others structures
- Porch lumber taken from at least two other structures

- Roof was wood shakes, a replacement layer was placed on top of the original, and those were removed from another building. Sometime in the 1980 a tin roof was taken from another structure and placed on top of the wooden shake layers
- Chimney opening changed three times and various reused material was installed
- All windows come from different structures, salvaged as needed, at different times
- Bathroom window opening created late 1980s
- Both exterior doors were taken from the same building and the current ones are the second installment
- Transom window is not original and the window casing was salvaged
- Decorative touches made of plywood fell off during move, they were created by a tenant

#### ***Front Room*** (ceiling and floor addressed later)

- 1870s structure was left open with no interior walls for a time
- Hard board was used as walls - salvaged from elsewhere
- 1950c first installation of dry wall which had 3-4 different paint layers
- 1980s another installation of dry wall
- Molding was salvaged and often did not extend the entire length of the wall and sometimes a 4" piece would be placed up against a 2" piece, sometimes painted in different colors
- 2 rail spikes used to block holes in main room walls

#### ***Kitchen Area***

- Two shutters and a stained-glass window from other structures used as cupboard fronts: stored in attic, will be reused
- Last installed cupboards were homemade units given to the owners by a local resident changing his garage storage out.
- Shelving was created using a variety of old iron rods from some type of equipment
- Wood was the primary material, save for metal-tin backsplash, reused metal for hardware, and possibly some metal at counter ends or elsewhere for decorative touches or water protection
- One of the counter tops was made of wood, and fragments were found still attached to dividing wall
- Small linoleum fragments remained stuck to the subfloor



- Under first subfloor, remnants of stone-ceramic tile (similar to bathroom)
- Two interior doors were removed prior to the move, and one was disposed of - doors were not historic nor original to the cabin-all salvaged
- Most of the drywall fell off the dividing wall during the move. Underneath layers of wallpaper were exposed. Remaining drywall removed in 2019. The dividing wall that remains is of interest. It is made of 4" x 12" hand hewn, rough pine planks. The planks are lagged together with small metal strapping- it is possible this is the only historic feature original to the cabin (1870s). However, it would not be uncommon for a 16' x 30' cabin to have no dividing wall depending on the family unit
- Two rail spikes were found along the base of the window to plug open holes (not very effectively)

### *Bathroom-storage area, non-public use*

In part, the bathroom will be altered for a new use. It will not be a public use toilet, but the public can view the room. Storage of records and materials will be needed and the bathroom will serve that purpose without altering its defining characteristics: salvage and reuse.

The bathroom construct is not original to the structure and is a new modern creation therefore giving us the most flexibility. By using décor, paint, and "exhibits" worked in the architecture, we will create a room to focus on mining and fulfill the functional need for storage. Modern silver pressed tin will be added and give the room a fully ore-metal look. This makes sense given the golden-bronze paint fragments used in the past and matched. As with all rooms it will tie into our interpretive plan. A top sliding door will be installed to provide more room for shelves and storage.

- At some point the floor was covered in salvaged slate-like earth tone tiles (1960c)
- Dry wall was added to walls (1960c) and then redone 1980c (1960s it was still part of the bedroom area)
- Paint samples from the first addition of dry wall was a family grouping of gold-bronze
- Salvaged molding-crown and base (1960c) was a blue color
- Pressed tin fragments were discovered in the back corner-South wall
- Three rail spikes were used on floor (2) and by the window (1)
- The window was added in the late 1980s when the bathroom was created from part of the bedroom area. The opening and the window, which was salvaged, are not historic
- The entrance wall into bathroom from the bedroom is not original

- The salvaged door has fallen off and cracked
- By opening the door into the bathroom, we lose 12 square feet of bathroom space. The same is true if we reverse the door and open it into the meeting room (bedroom). In the bedroom it would open against the backdoor and we lose space in an already small room. In the bathroom, when using the toilet, the door would bump up against the occupant's knees.
- We think the first bathroom door used in that space may have been from the old outhouse

### *Ceiling*

- The ceiling drywall installation from the 1980s remained intact in the bedroom and bathroom area. However, it fell off in the kitchen and main room area before and during the move
- There was no ceiling originally but soon after its move to B Street as rental property, salvaged wainscoting was added to create a ceiling, complete with the various paint colors of the other buildings from which it was salvaged (at least three other structures based on plank size and paint color)
- The ceiling in the bedroom and bathroom is covered in drywall and during patching of the drywall, which remained largely intact, wallpaper was discovered in the bedroom area; it was blue with a night time sky or star theme.
- Claw feet from a bathtub were discovered in the attic and the electrician was able to remove them safely
- Various holes are in the wainscoting which had been covered in dry wall showing one of the wood stove locations
- Handwritten measurements from the initial installation of the wainscoting are still present and will be preserved

### *Floor*

- The floor was originally dirt, later roughhewn lumber which was relatively standard and may actually have been made for the cabin during its time as company housing. It is very similar in color and texture to the dividing wall
- Later, various wood pieces were salvaged and used as flooring, then a subfloor. A carpet was the final installation sometime in the 1990s -even the carpet was taken from elsewhere
- One interesting observation: the north side of the floor is filled in with the same wainscoting that was salvaged and used as a ceiling. It is possible that moving the structure to B Street damaged part of the floor, or the building was derelict for a period of time and that impacted a section of the flooring

## Rehabilitation: Adaptive Reuse Identify and Retain Historic Features: Salvage and Reuse

The miners' cabin will become a visitors center providing opportunities to learn about residential living, mining, and of course, the cemetery. Visitors will be able to get help in researching burials and genealogy. We will store files, photographs, and office supply items. It will become the home for the CCF's operations and board functions. It will provide additional security for the site.

The oldest historic feature is the roughhewn dividing wall which is now exposed on one side due to the collapse of the drywall. It will be preserved. The ceiling is the next oldest feature, but not historic to the cabin, but rather to 2 or 3 other unknown structures. However, after the drywall collapse, it is now exposed and will be preserved in the kitchen-main room area. The bedroom and modern bathroom has its dry wall intact. There were numerous items preserved in the attic area that were used in the cabin and removed over the past 10 years. Those items will be reused as part of the rehabilitation plan.

There are few truly historic features associated directly with any of the historic periods of the cabin, but that is not its character defining feature. What defines this cabin is its direct involvement with the four phases of salvage and reuse. It presents us with a revolutionary opportunity to convey the historical and cultural relationships people had with architecture here on the Comstock. The cabin is a standing reminder of the significant periods of historic salvage and reuse. To not carry that baton onward would be dishonest, an attempt to fool the public.

### Features Convey Historical, Cultural, and Architectural Values: Salvage and Reuse

The planning group actually started with interpretation plans before designing the actual rooms. The relationship between architectural features, historic buildings and human need has not been explored in any detail on the Comstock. It is obvious that the retention of its character is dependent on salvage and reuse as part of the adaptive reuse plan. However, without interpretation, this design may tend to look like a thrown together meaningless exercise.

We started with our mission; the cabin will tell its own story of salvage and reuse by focusing on its history of residential living, mining, and burial practices. Instead of just randomly reusing architectural features we would select items that would fall into one of those three areas and interpret the item.

The attic contained some of the salvaged items that were used in the cabin prior to its move. Thanks to the prior owner we know the outdoor shutters were taken from a house in Virginia City sometime in the 1940s and used as cabinet doors on the lower part of the kitchen cupboard system. A stained-glass window was taken from a house in Silver City and used as a cabinet front in the upper cupboards of the kitchen. Bathtub claw feet, railroad spikes, old books (used to hold up the porch), newspaper (insulation) and other assorted items have been retained. These items have been reused in our design and will be interpreted for the public. This will accomplish our goal of conveying the relationship between architecture and cultural behavior over time.

Three years ago, we had a UNR art student install abandoned wood from the cemetery along the north interior wall of the cabin. The wood was selected by experts to highlight craftsmanship and ensure that only unusable wood was selected. This was all wood that could not be preserved, including three wood grave markers that had been previously stolen and were unable to return to the cemetery. The wall in and of itself would be confusing to a visitor - but there will be 18 different interpretive plaques starting at the entrance and extending to the end of the wall.

The first plaque starts with an explanation of the Tahoe region and discusses the trees and lumber extraction process. As the visitor walks along the wall they will “move” from the Tahoe tree, to the lumber jacks, transportation methods (horse, donkey, wagon, water, etc.), lumber brokers on the Comstock, tradesmen and the tools they welded, use of wood in mining, and various uses by the consumer. The wall is a character defining feature as an example of salvage and reuse, but one that is focused on the sharing of history and the relationship between people and architectural features.

We will give you some examples of how these architectural features will be used, integrated in the rehabilitation plan, to celebrate the cycle of salvage-reuse, and share the stories with the public. All of the salvage and reuse items can be removed without damage to anything historic - of which there isn't much historic-to-the-cabin materials remaining. (See examples in Attachment Section)

### **Interpretation of Salvage and Reuse** **Focused on Residential Living, Mining, and Burial Practices**

The CCF has always maintained a strict policy regarding the use, or more specifically, the overuse of “plaques” or framed informational material stuck on structures or in landscapes. In 21 years and within 65 acres of cemetery lands, the

CCF has only installed one plaque. For the cabin, the use of 5" x 7" framed explanations are a short-term solution. In the future, an audio-visual explanation of some type will be created to replace all plaques and explain the architectural "exhibits".

Our interpretive plan is a two-pronged attack; one for the general visitor and one specifically for school groups. The general visitor will be able to read the interpretative information which the school groups will have a more suitable method. Our rehabilitation plan had to be accompanied by a succinct interpretive plan to avoid misunderstanding and increase public knowledge. Upon entrance, the visitor will receive information about the cycles of salvage and reuse in order to frame all that they see within. But, let's us start with the unseen.

### *The Unseen*

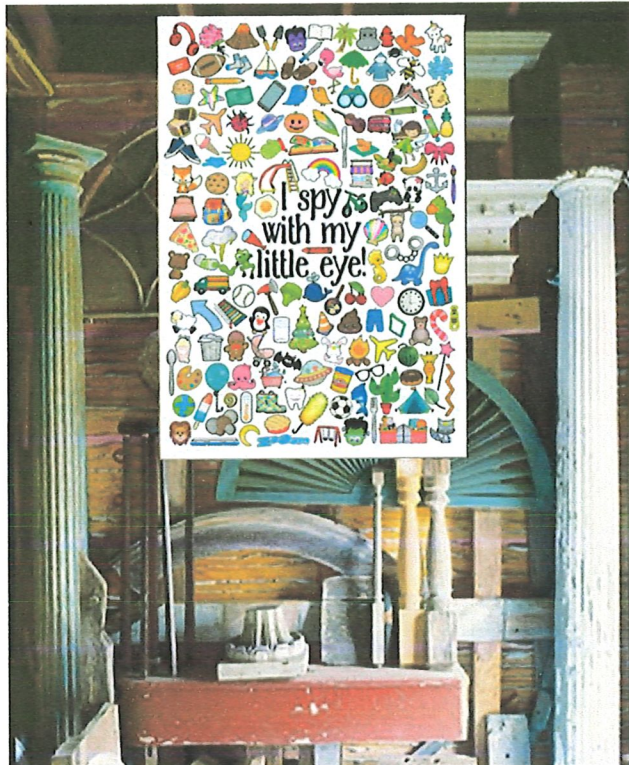
In some cases, our discoveries can't be readily integrated and/or seen. For example, the four layers of wallpaper on the roughhewn dividing wall is of interest; both in type and application. The first layer was a simple pattern printed on material and adhered to a layer of canvas. We removed as much of the remnants of the four layers as we could before installation of the cupboards and created a shadow box display. The wall will be exposed however, kitchen cupboards will be re-installed and as in the past the cupboards will cover a good portion of the wall.



There are other unseen items such as the books used for stabilization of the porch and newsprint as an insulation technique that will not be integrated into the structure and therefore will require a different approach in sharing information with the public.



## I Spy with My Little Eye



Something used in mining  
Something used in a house  
Something used in the cemetery

We collaborate with all sorts of professionals. Given that a large number of our visitors to the cemetery are elementary school groups we tapped two retired school teachers to help us craft an interpretive method to introduce the miner's cabin and learn about history. Our mission:

**To tell the stories of Comstock mining, residential living, and cemeteries through the rehabilitation process, the use of architectural features, and decorative items.**

School groups would be given a category: mining, residential living or cemetery. They would be told that there are, for example, 18 items in the visitor center that have to do with the cemetery. Can they spy them? Can they find all 18? There are 14 items that have to do with mining. Can they spy them? Can they find all 14? Both by finding the items, and by not finding the items, the school groups will learn a variety of historic information about the history of salvage and reuse, mining, home life, and the cemetery.

## Summary

“Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or elements from other historic properties, will not be undertaken...” *Standards*

It is a blessing that the *Standards* were created as guidelines. When they were written a clairvoyant team of people must have envisioned a little miner's cabin on the Comstock. If the *Standards* were a law the little miner's cabin would lose its voice, unable to tell its story. If the *Standards* were a law the little miner's cabin would be unable to preserve its cultural and architectural values. If the *Standards* were a law its character defining features would be forever lost. But, the *Standards* are not laws.

Salvage and reuse has been an unofficial building method employed on the Comstock for over 130 years. It has achieved an architectural character all its own. And, practicality has played a large role in its use as a method to save money, even stay warm. The use of architectural materials from other buildings has long been considered a down grading of the structures' context, its very integrity. For the mining cabin, the opposite is true. Salvage and reuse is its keystone and evolutionary character defining feature. This is the foundation of the cabin's built environment and it must be maintained within the rehabilitation plan in order to maintain visual compatibility.



# Attachment Examples

Attached are selected examples of interpretation plaques (shown in text frames) and architectural “exhibits” for the cabin.



## Rail Spike

**Rail spike is a large nail with offset head, used to secure rails and base plates to railroad ties.**

**Robert Stevens invented the rail spike first used in 1832.**

***Six rail spikes were found in the miner's cabin during rehabilitation, used to plug holes in the floor, window joints, and walls.***

**What is the *Four Special Spikes* and how was Nevada involved?**

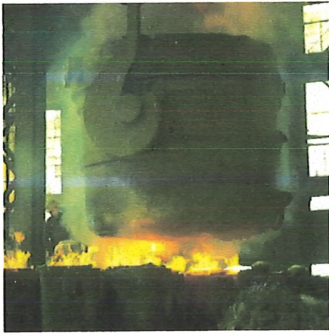


**Meeting Room Windows-curtains are hanging from the rail spikes found within the cabin.**

### **Wrought Iron**

*Wrought* means to work, literally “worked iron” which is used to decorate grave sites. While extremely popular in the Victorian period due to its workability, it is no longer made commercially.

In the 1980s a California newspaper suggested that people could go to Virginia City cemetery and steal the historic wrought iron to reuse in their houses. In 1997 two young men hacked off wrought iron pieces and fences from Comstock and Carson City cemeteries. They planned to sell their cache to a Tahoe antique dealer. These pieces were recovered but we were unable to restore given the severity of the extraction.



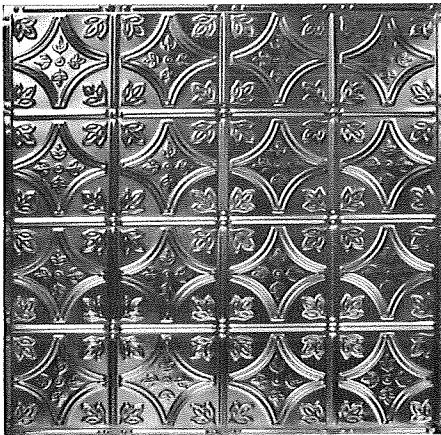
Main room-wrought iron as crown molding, is tacked on-this “exhibit” with explain the history of theft in the cemetery



## **Controversial Pressed Tin**

Pressed tin was popular in the American Victorian period as a less expensive decorative alternative to the integrate plasterwork used in Europe. There were critics, or perhaps one could say snobs, that felt pressed tin was “faking it”- seen as a faux version of “real” plasterwork. Pressed tin was affordable opening the decorative market to the American middle class, but some felt it was “morally wrong” to imitate the “real thing” even though it was durable, fireproof and not expensive.

This wall is made from modern pressed tin and is a fitting addition to our “Ode or Ore” themed bathroom. A fragment of historic tin was found in this room in the upper corner and could have been used on the ceiling or wall in the newly created bathroom (1980c).

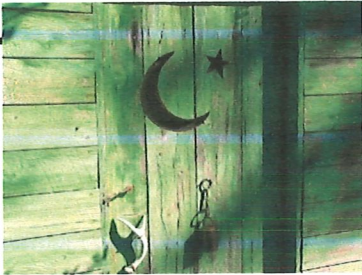


**Modern pressed tin exhibit, installed on one bathroom wall, using upholstery tacks-if you multiply the size of the bathroom by 3, it is approximately the height and width of John Mackay's first ore vein**

### **The Outhouse**

Outhouses were used on the Comstock until outlawed in the late 1980s. The miners cabin had an outhouse. The bathroom was created in 1989 by putting in a modern wall in the bedroom area, adding a door, and a window. There is some oral history that suggested they reused the outhouse door for the interior bathroom door.

A common design element for outhouse is a star and/or a moon. The origin of this motif is not clear but the functional purpose was for ventilation. The screen on this design was the original screen used for an outhouse located in the cemetery. There were at least three outhouses on the property. Nothing remains save the fragment of ventilation screen.



**This exhibit will hang, with a picture hanger, on the back of the bathroom door**



## **Sliding Door-Adaptive Reuse**

Sliding doors are hardly a new invention, evidence of use is found as early as the first century in Rome. Nor was a sliding door new to the Comstock. The mechanism by which a door slides is called a sliding door gear. They can either have a top or bottom gear. The advantage here is obvious. We need space. Using a regular door we lose 12 square feet, using a top sliding door, we can have extra room for storage.

Pictured here is a Comstock door; with hardware missing-it was salvaged, and reused elsewhere.



**Sample of door planned on non-historic wall, entrance to bathroom (1980c)  
Saves 12 square feet of space**