



Doing better than "unnecessary and undue degradation":

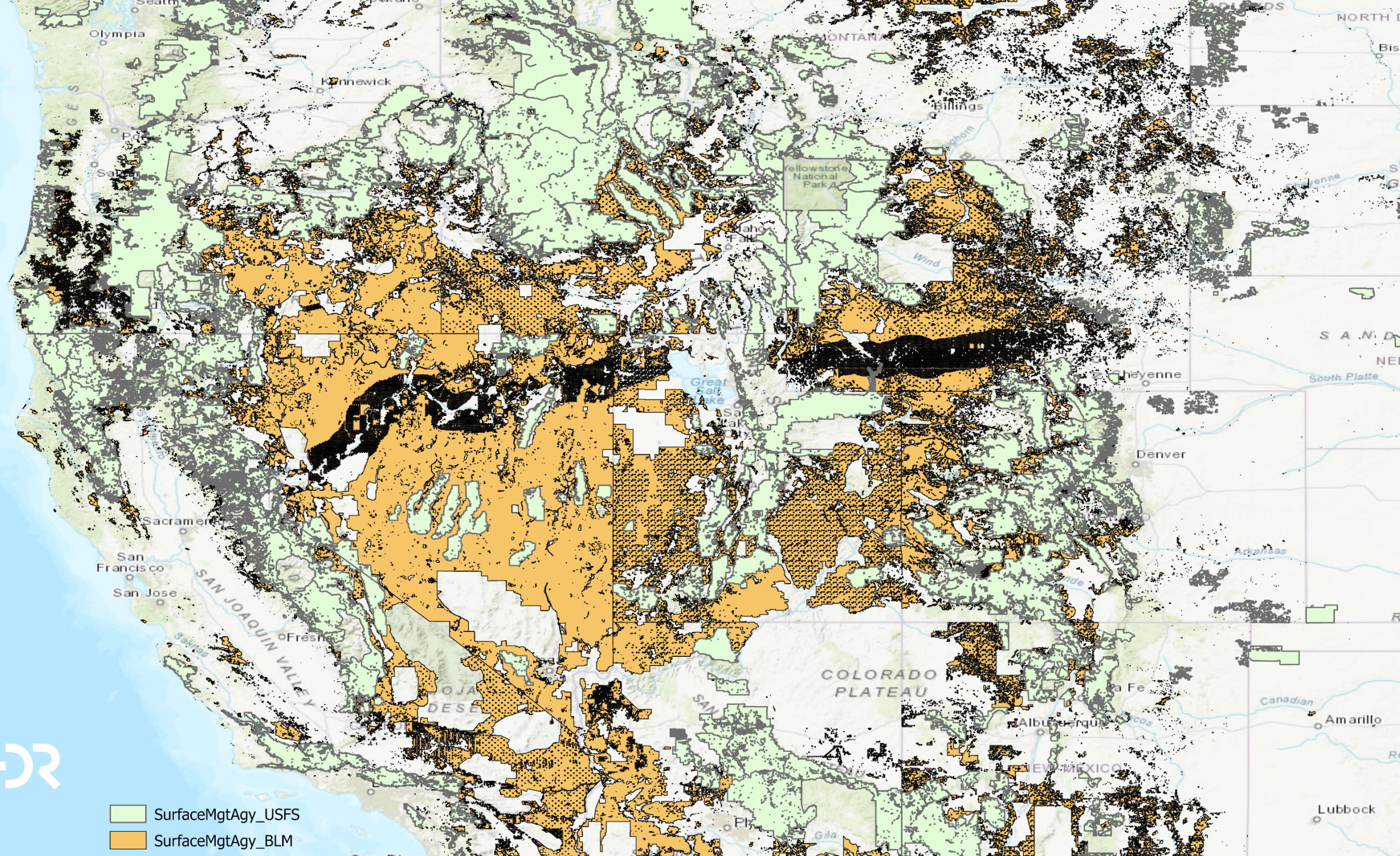
Working within Federal law on Federal land



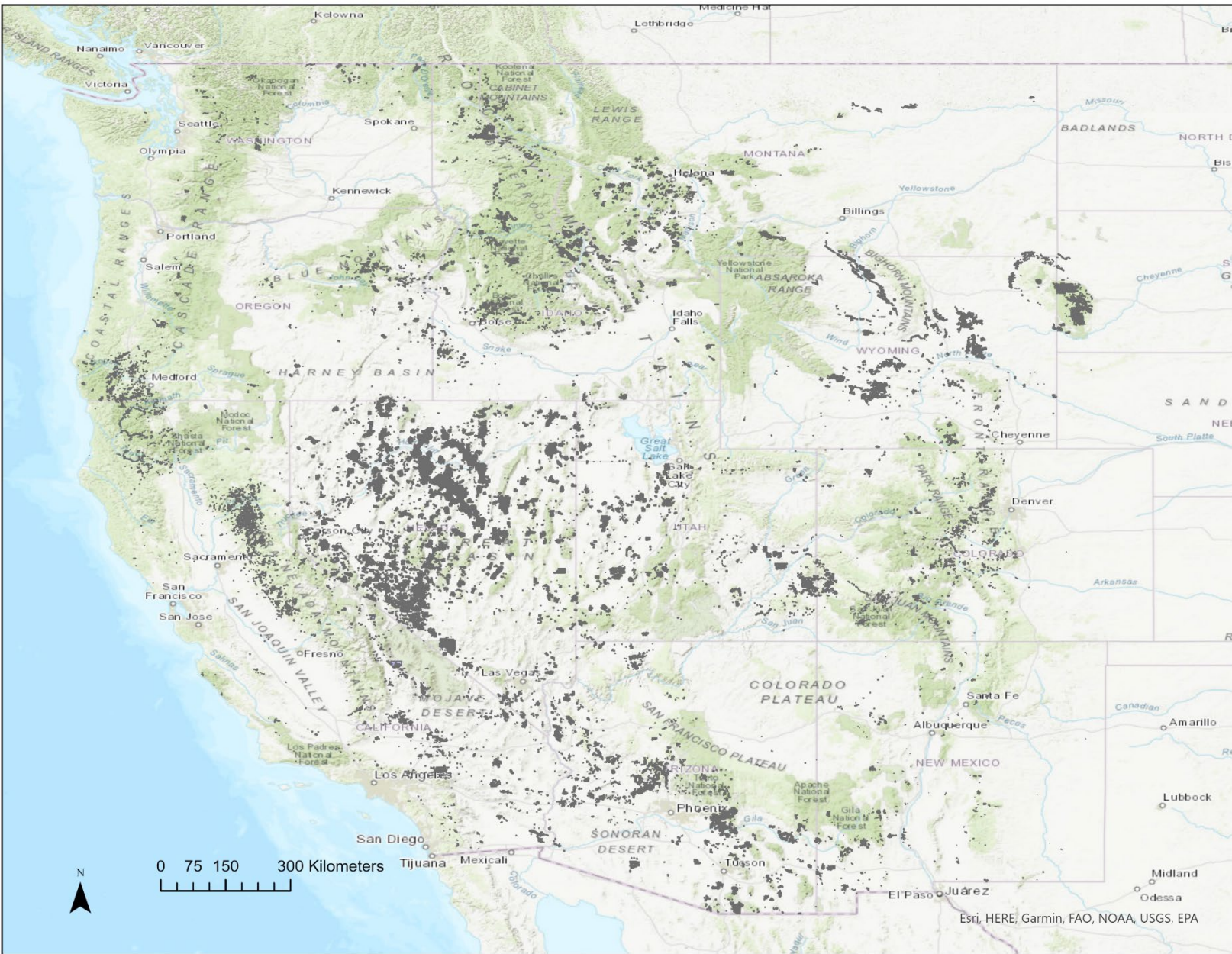
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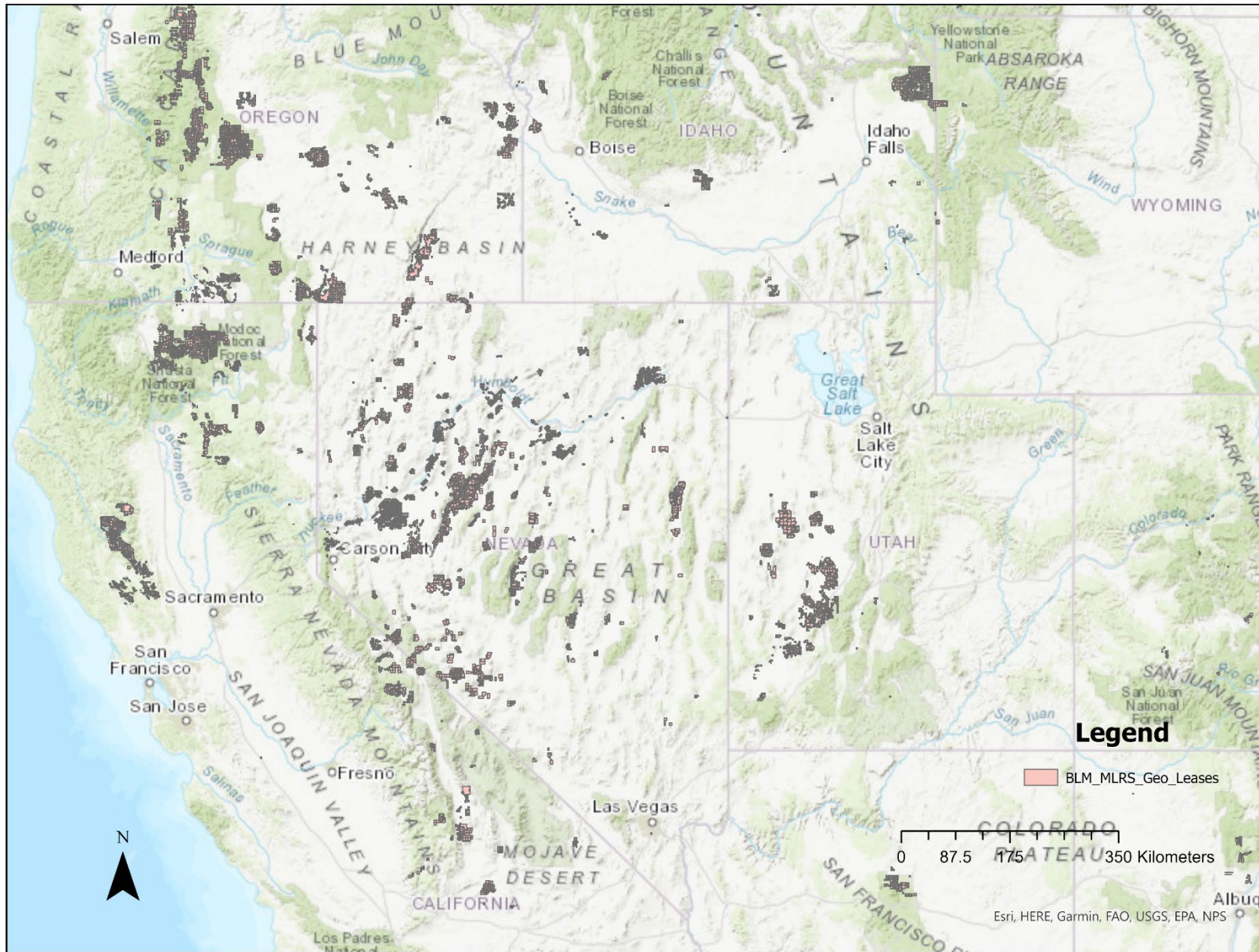
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- SurfaceMgtAgy_USFS
- SurfaceMgtAgy_BLM



- Map of open mining claims in the Western US



- Map of valid geothermal leases in the Western US



Hycroft Mine, NV

General Mining Act of 1872

Federal Land Policy
Management Act (FLPMA)

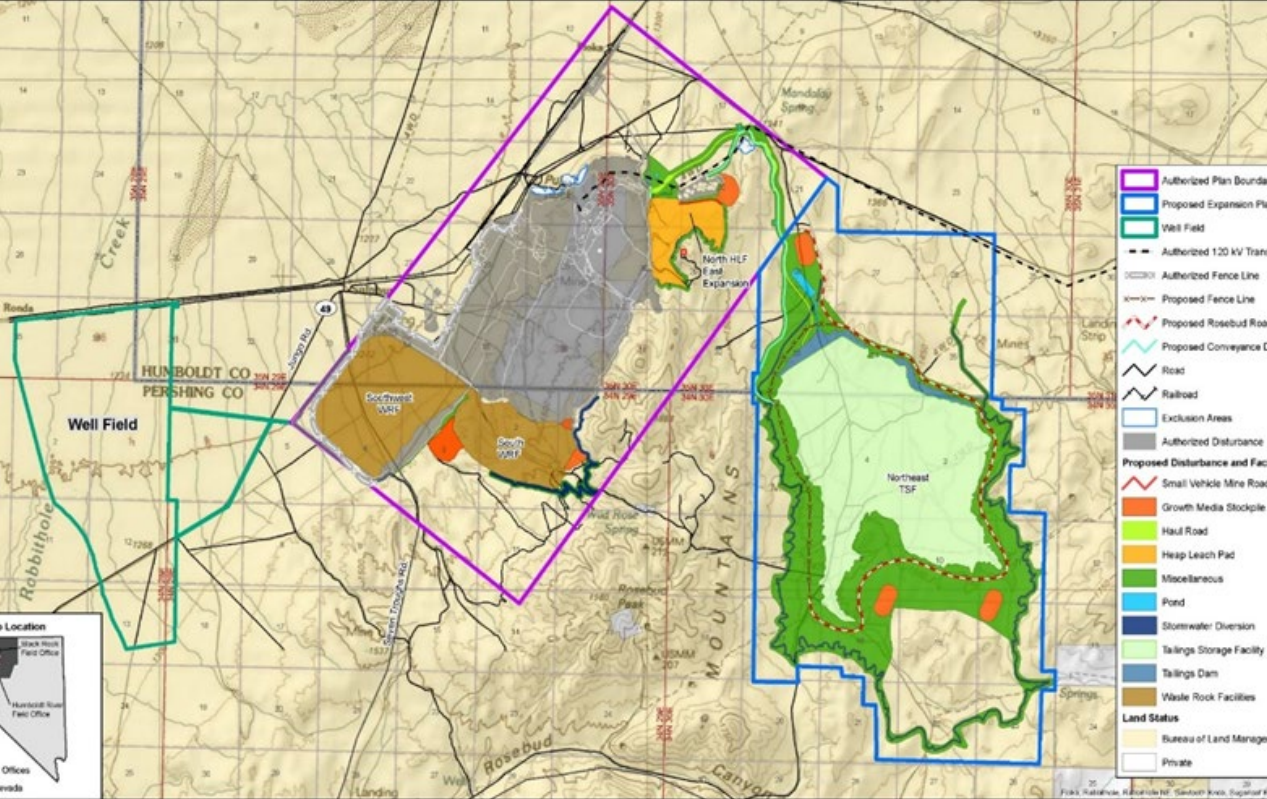
Mining & Mineral Policy Act of
1970

Steam Act of 1970

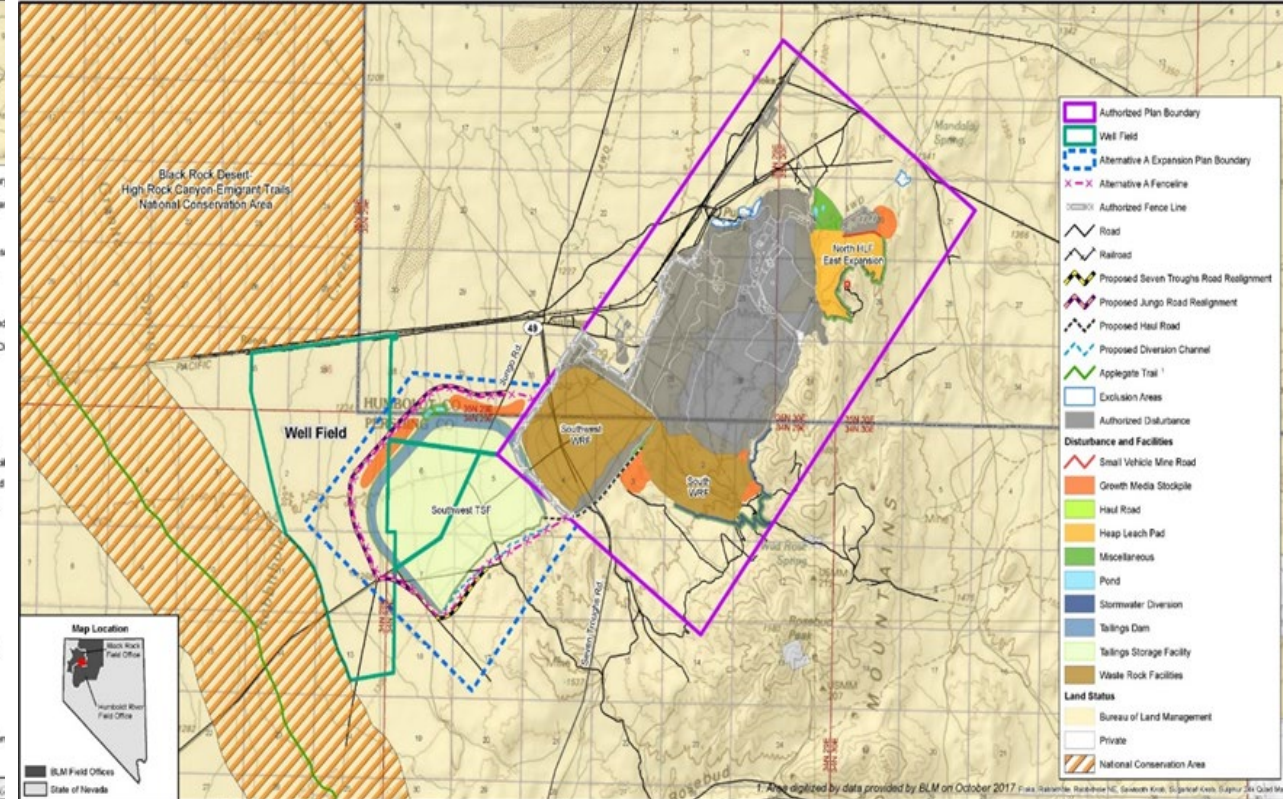
Various Mineral and Energy
Policy Acts

Concept of “unnecessary and
undue degradation” (UUD)

Environmental impact analysis
carried out under NEPA



Hycroft mine existing footprint and proposed action



Hycroft mine existing footprint and alternative action

San Emido Phase 2/North Valley geothermal project

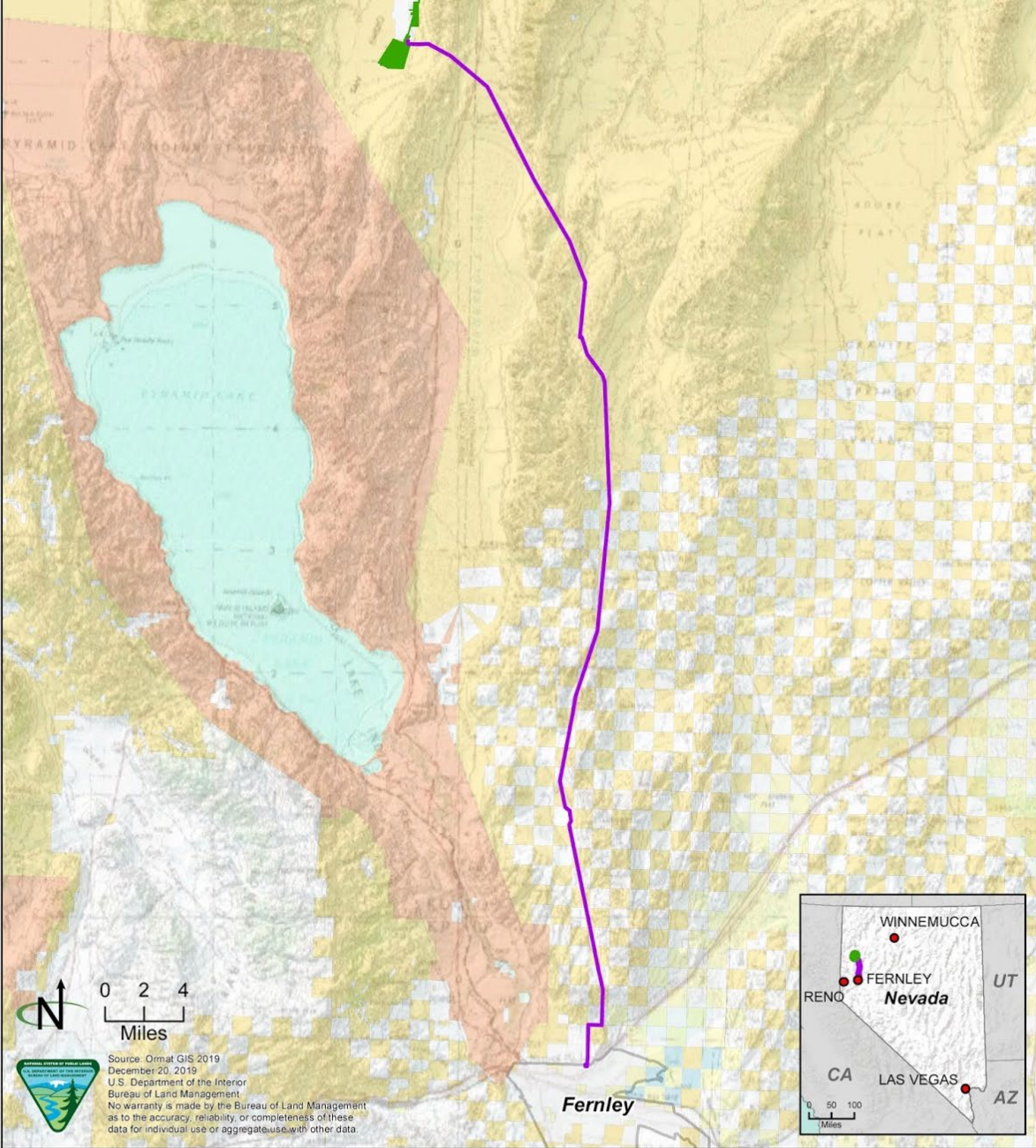
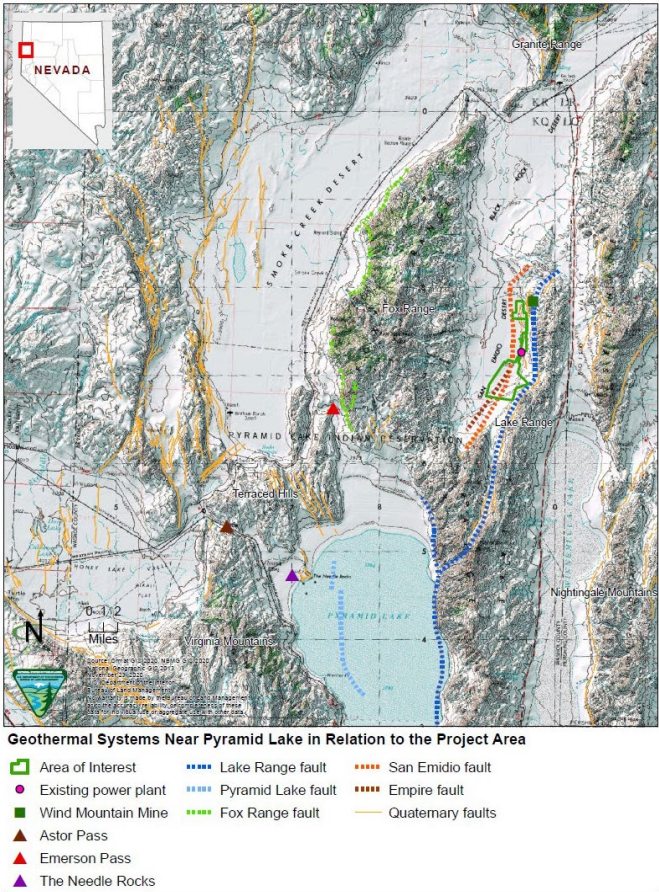


Figure 1: San Emido II – North Valley Geothermal Development Project Area

Closing notes

- NEPA is procedural
- UUD is not a desired outcome for permitting decision
- Pre-planning and critical issue analysis can help inform the NEPA alternative process
- Pre-scoping is a way to engage with publics sooner

San Emidio geothermal powerplant

