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September 21, 2012

Bureau of Land Management  
Adrian Garcia, Project Manager  
SunZia Transmission Line Project  
P.O Box 27115  
Santa Fe, NM 87502-0115

Re: Comments on SunZia Transmission Line Project Draft EIS/RMPA

Dear Mr. Garcia:

We appreciate the opportunity to provide comments on the SunZia Transmission Line Project Draft Environmental Impact Statement. We are a private property owner along the proposed line alternatives defined as Sulphur Springs Valley (4B) and North of Mt. Graham (4A). We plan to transfer these lands to the Bureau of Land Management (BLM) upon completion of a Federal Land Exchange, pending before Congress. As such, it is important for the BLM to understand the biological and cultural features of private lands that are part of that exchange.

Resolution Copper Mining (RCM) is a limited liability company owned 55 percent by Resolution Copper Company, a Rio Tinto PLC subsidiary, and 45 percent by BHP Copper, Inc., a BHP-Billiton LC subsidiary. Resolution Copper Company is the manager of RCM. Rio Tinto is a world leader in mining and exploration that discovers, mines, processes and supplies metals and minerals.

The Resolution Copper project is located roughly three miles east of Superior, Arizona, and is one of the largest copper ore bodies ever found. This enormous resource is expected to yield more than 1 billion pounds of copper per year when in full production and meet more than a quarter of the United States' anticipated copper demand – based on today's usage – for several decades.

Prior to developing the mine, Resolution Copper will spend about \$1 billion to complete extensive environmental, cultural, engineering and other studies, and exploratory activities. To better facilitate construction and operation of the mine, we are seeking to obtain title to about 2,400 acres of U.S. Forest Service land at Oak Flat, under which the ore body lies, in exchange for about 5,300 acres of high-quality Arizona conservation lands owned by Resolution Copper. *The Southeast Arizona Land Exchange and Conservation Act* was drafted to do just that. The exchange will provide us the necessary access to develop the mine and allow the Resolution

Project to move forward, providing long-term economic and social benefits to the people of Arizona while preserving and protecting key conservation areas throughout the state.

*The Southeast Arizona Land Exchange and Conservation Act* has passed the US House of Representatives with the leadership of Congressman Paul Gosar and is awaiting passage in the US Senate with Senators John McCain and Jon Kyl as co-sponsors.

One of the key parcels in *The Southeast Arizona Land Exchange and Conservation Act* is 3,073 acres known as the 7B Ranch on the San Pedro River. This parcel which contains what is possibly the largest remaining mesquite bosque in the Southwest, will be conveyed to the Bureau of Land Management, and become a new unit of the San Pedro Riparian National Conservation Area. The Bureau of Land Management's San Pedro Ecosystem Acquisition Plan called the 7B Ranch one of the three highest remaining priority conservation sites along the nearly 90 miles of the lower San Pedro River.

The San Pedro River Valley constitutes one of the most important corridors for migrating birds in North America, and the lower San Pedro (including the 7B) has been identified as a Globally Important Bird Area.

The 7B Ranch also includes 21 known archeological sites, found during surveys by the Center for Desert Archaeology. These include four platform mound village compounds, artifact scatters, and dry land farming features.

Resolution Copper has purchased this land and has worked with The Nature Conservancy to restore and improve habitat before we convey it to the federal government as part of the land exchange.

Specific to the SunZia Transmission Line Project Draft Environmental Impact Statement, Link C592 is part of both routes 4A and 4B and would cross the San Pedro River at the 7B Ranch. We are concerned that the Sulphur Springs Valley (4B) and North of Mt. Graham (4A) alternative routes could adversely impact conservation values and migratory bird populations at the 7B Ranch. Given the significant ecological importance of the property as described in various Federal, State, and NGO studies and plans we urge you to consider a transmission line route that avoids the 7B Ranch

Thank you for your consideration of our comments and we look forward to further involvement in this process.

Sincerely,



General Manager  
Environment, Legal and External Affairs