



Foreign Affairs and
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Northwest Area Water Supply Project EIS
Bureau of Reclamation
Dakotas Area Office
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Att : Alicia Waters

Dear Ms. Waters:

The Government of Canada would like to take this opportunity to comment on the scope of the proposed Supplemental Environmental Impact Statement regarding the Northwest Area Water Supply Project (NAWS).

The Government of Canada has been engaged during each stage of the environmental assessment process due to concerns about the threat of invasive species being transferred from the Gulf of Mexico basin to the Hudson Bay basin. The Government of Canada has advocated exercising caution regarding the need for major inter-basin transfers given the potential for irreversible harm from invasive species transfer.

The Bureau of Reclamation, in its Final Environmental Impact Statement, stated that the impact of the project on Canadian resources was "outside the scope of the EIS". The Government of Canada objected to this conclusion and filed an amicus brief that articulated this position.

Article IV of the *Boundary Waters Treaty* of 1909 contains a prohibition on transboundary pollution and certain U.S. statutes, including the one authorizing the NAWS project, mandate a consideration of transboundary impacts of a project. The Government of Canada was pleased with the U.S. District Court decision to remand the case to the Bureau of Reclamation to, among other things, take a hard look at the consequences of biota transfer into the Hudson Bay basin, including Canada.

Given this project's potentially significant environmental and economic impacts on Canada, a careful analysis is essential. We are prepared to work with the Bureau of Reclamation to look at appropriate ways to study these impacts and to make available existing studies and other data that may assist in completing this analysis.

Once again, we thank you for the opportunity to provide comments. We see this work as important in ensuring that the transboundary implications of this project are fully assessed.

Yours sincerely,

Heather Grant

Heather Grant
Director General
North America General Relations