

First Nation of Na-Cho Nyäk Dun

P.O. Box 220
Mayo, Yukon Y0B 1M0
Tel: (867) 996-2265
Fax: (867) 996-2267
E-mail: main@nndfn.com
Website: www.nndfn.com



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YESAB Mayo Designated Office

PO box 297, Mayo, YT

Y0B 1M0

Telephone: 867-996-4040

Fax: 867-996-4049

RE: YESAB #2023-0090—Mayo Secondary Thermal Generation Project

Introduction:

The First Nation of Na-Cho Nyäk Dun (FNNND) has reviewed project number 2023-0090 (the “Proposed Project”) which involves the installation of backup diesel generators for thermal generation proposed by the Yukon Energy Corporation. The project takes place at the existing hydroelectric generation facility near Wareham Dam outside Mayo within the Traditional Territory of FNNND.

FNNND wishes to raise the ongoing issue that regional land use planning has not occurred for this area. No finalized land use plan and associated policy and management processes are in place for the Mayo area at this time. FNNND therefore maintains that major projects and developments that may undermine FNNND rights and interests cannot move forward in the absence of a land use plan at this point in time. With that being said, FNNND recognizes that certain critical infrastructure projects cannot be delayed when their need is crucial. The purpose of the Proposed Project is to provide enough generating capacity to the Yukon grid to meet demand during peak periods (primarily in the winter).

In general, FNNND does not have significant issues with the planned design and operation of the project within its intended purpose. Below are outlined a number of concerns and suggested actions with respect to activities as they are proposed in the assessment documents.

- ***Timeline:*** There is no clear indication from the proposal documents what the intended lifespan of the project is (i.e. continued need for diesel power generation going forward). FNNND views the installation of diesel generators as a short-term necessity while implementation of adequate energy security planning and integration of long-term, non-fossil-fuel-dependent solutions is underway. While FNNND and YEC continue to engage formally in discussions including ongoing and future energy needs, it will still be important to set target timeframes to work towards eventually phasing out the need for diesel generation.
- ***Increased Fuel Transport:*** The use of the diesel generators will require fuel delivery of up to 1 B-train per week. The increased fuel transport can contribute to multiple effects including increased industrial traffic on the Wareham Lake Road which is increasingly becoming a residential access location with occupancy of the new subdivision. More fuel

truck traffic also increases the potential risk of spills or accidents along the transport route which could affect waterways and habitats nearby.

- **Noise Levels:** There are no actual mitigations listed for potential increase in noise levels. From the discussion provided in the proposal documents, noise levels in relation to residences was not expected to be particularly high. However, the area is increasingly becoming a residential location with the development of the nearby subdivision. It may be prudent to allow potential for monitoring, including gauging local residents' perceptions of noise levels, with potential for follow-up action if necessary.
- **Socio-economic Benefits:** The acquisition, operation and decommissioning of these generators may provide opportunity for economic benefit through partnership and planning. Furthermore, any potential for future site use post-decommissioning, including potential installation of solar panels and/or battery storage, may give rise to further economic benefits locally. It is expected that this project is not seen in isolation as a distinct response to an immediate need but rather an evolving opportunity with steps ultimately towards non-fossil-fuel power generation to meet future needs and benefit communities. FNNND requests that development of a project agreement with the Nation be initiated to facilitate some of these benefits and forward-looking planning.
- **Generation Capacity Clarity:** Through response to an information request, it is understood that while the total generation capacity of the generators to be installed will be well over 5MW, they will never be run to exceed 4.9MW. FNNND expects this output limitation to be binding through regulatory requirements. The context of thorough energy planning within a timeframe is necessary here to ensure we do not approach a situation where more than 4.9MW is required from this backup system without effects having been assessed and regulated at that scale beforehand.

Conclusion:

FNNND does not have significant issues with the proposed project within the parameters of its current and projected need. Climate change continues to be the major issue of our time, impacting our communities in myriad ways. FNNND sees this project as a temporary backup solution within the context of continued energy planning and development for long-term, reliable, renewable solutions which benefit the local communities.

Mussi Cho,

Stephan Walke
Environmental Assessment Officer,
Lands and Resources
Nän-yę Yétsiyóhoyän
First Nation of Na-Cho Nyäk Dun
867-996-2265 Ext. 152
stephan.walke@nndfn.com