



**association to protect  
AMHERST ISLAND**

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November 23, 2012

Mr. Tadeusz (Ted) Wieclawek, Fire Marshal  
Ministry of Community Safety and Correctional Services  
5775 Yonge Street, 7th Floor  
Toronto, ON, M2M 4J1

Dear Mr. Wieclawek,

On Saturday November 3, 2012, Amherst Island's volunteer fire department responded to a call concerning a fire in a marsh. The fire was reported at 2:40 p.m. A call for additional fire-fighting teams from the mainland towns of Bath and Odessa was made shortly before 3:00 p.m.  
<http://www.thewhig.com/2012/11/05/amherst-island-fire-scorches-marsh-area>

The first off-island fire team arrived about an hour after the call. The time in getting off-island help is determined by how long it takes to get the responding team(s) to the ferry dock, where the ferry is when the call is made and how long it takes for the ferry to get to the mainland dock, by the 20 minute trip to the island and then by the time needed for the off-island team(s) to get to the location of the fire on the island.

The teams for this fire had to call for directions once they were on the island. They were talked through the hard-to-find twists, turns and unpaved roads leading to the fire. This is not a problem for the Amherst Island team, but is for those not fully familiar with the island.

The Amherst Island fire team was called out at 2:40 pm on Sunday. The fire was declared under control at 10:00 am on Monday. It burned for over 19 hours.

This fire destroyed 200 acres of marsh and took place AFTER approximately 3 weeks where there had been some rains, a few quite heavy in conjunction with Hurricane Sandy. For the 4 months prior to that, there was a drought, which is not uncommon on Amherst Island.

There was also no appreciable wind for the duration of the fire. Thanks to the 3 weeks of some rain and no real wind, there were no injuries or property damage. Had the fire occurred before the rain or with any wind, the consequences might have been far different.

There are 2 attached images from the Nov 3 - 4 marsh-fire on Amherst Island:

- The first is of the firefighters heading to the fire in a pick-up truck with their plastic tank of water which they must fill up from the tanker at the road. The pick-up truck was used because of the difficulty of larger vehicles accessing this fire.

- The second is the map of the proposed siting of the wind turbines on Amherst Island, showing their placement across the entire island.

As you can see from this story about the recent marsh fire, Amherst Island has a unique fire situation.

- Amherst Island traditionally has very dry summers; farmers rarely get a second cutting of hay because of the drought conditions.
- Amherst Island has a volunteer fire department of about 12 members.
- The minimum number of firefighters needed to respond to a fire on A.I. is three. Because this is a volunteer fire department, there is no requirement that any number of volunteers be on the island at any given time.
- Amherst Island's fire equipment consists of one pumper and one tanker. The pumper has approximately 15 minutes of water. With the tanker, to keep water flowing, a "tanker relay" is set up to go back and forth to the nearest water source. That takes 15 minutes or more, depending on where the fire is in relation to the water source. (This relay had to be used by the 3 fire teams in fighting the marsh fire on Saturday Nov 3.)

The most common incident from industrial wind turbines is blade failure; the second most common incident is fire. <http://www.caithnesswindfarms.co.uk/accidents.pdf>

If wind turbines are installed on Amherst Island, a very serious situation could arise in the event of a fire from one of them.

The Nov. 3-4 marsh fire was started on the ground by 2 ATVs that were stuck in the marsh and trying to get out. A fire that started in a 50-storey turbine would have a far-reaching "umbrella" of sparks 526' in the air, which could descend in multiple directions over a considerable area.

If fires ignited in several places and there was any wind and/or the typical Amherst Island drought conditions were present, the entire island and its residents would be at risk. Amherst Island's unique set of circumstances was clearly defined by the Nov. 3-4 marsh fire; the lives, health and property of those living on Amherst Island must be protected.

The outstanding questions are:

- What specific fire-fighting capability is Algonquin Power obliged by law to have to ensure Amherst Island residents the protection of life and property from wind-turbine fires?
- What specific mandates or requirements does Algonquin power need to put in place to protect the property and lives of the residents of Amherst Island?

The Technical Guide to Renewable Energy Approvals provides rather disturbing information. "The proponent of a renewable energy project must create plans to manage emergencies at the project location and to provide channels for communication to the public, Aboriginal communities and municipalities, relevant Ministries of the Ontario Government including the Ministry of the Environment, local road boards and local service boards."

The Guide further states that the Emergency Response Plan should include the following components:

- A plan for communications in the event of an emergency including a description of the chain of communications between the proponent and relevant stakeholders under emergency scenarios applicable to the project.
- A description of how the information will be disseminated to all relevant stakeholders such as the local fire department.
- The emergency response plan should refer to obligations under the Environmental Protection Act with respect to spills.

Clearly, per the requirements of the Green Energy Act, Algonquin Power's responsibility, with regards to managing emergencies, ends with the dissemination of information. This is not acceptable.

Given the difficulty of providing effective fire protection on Amherst Island, and in light of the Fire Marshall's power to advise ministries and agencies of government in fire prevention and fire protection problems, will you advise the Ministry of the Environment and the Ministry of Community Safety and Correctional Services that any wind-turbine installation on Amherst Island is not advisable?

Yours faithfully,

Peter G. S. Large, P Eng,  
President, APAl - Association to Protect Amherst Island

cc:  
Mr. Wayne Calver, Fire Chief, Loyalist Township  
Fred Stephenson, Deputy Fire Chief, Loyalist Township  
Mayor Bill Lowry, Loyalist Township  
Hon. Madeleine Meilleur, Minister of Community Safety  
Hon. Jim Bradley, Minister of the Environment  
Ms. Doris Dumais, Ministry of the Environment