

Daniel Scholey, RFT  
Authorizations Specialist  
West Coast Region  
Ministry of Water, Lands & Resource Stewardship  
Nov. 19, 2024

Dear Daniel Scholey,

As an award-winning Canadian journalist reporting wireless hazards since publication of my book, *Scorched Earth* (New Society Publishers, 1991) — and as a 24-year Hornby Island resident who submitted suggestions to our Local Trust Committee (LTC) for consideration in their recent referral to you — I read with some dismay the Nov. 1, 2024 response by Rogers Communications Inc. to our local government’s July 2024 unanimous vote of nonconcurrency regarding their proposed cell tower in our central district.

Seven key points made by consultant Brian Gregg on behalf of his Toronto-based client, and subsequently posted on the Islands Trust website, repeated identical misrepresentations made by him over the past 27 months of our much abused tower siting process. Surprisingly we learn:

**Rogers would like to encourage further dialogue on this proposal to ensure that the results of the entire consultation process are taken into account.**

Many of us here on Hornby say, “It’s about time.” In this spirit of more dialogue, let’s start with Mr Gregg’s initial response to our LTC’s consensus vote of nonconcurrency:

**1. ...it is materially incorrect for the LTC and Islands Trust to conclude that there is overwhelming ‘community opposition’ in relation to the subject proposal. (39)**

As evidence of this claim, Mr Gregg references a May 3, 2023, Rogers report on the results of two rounds of mail-outs. Of 121 written replies from Hornby residents...

- **62% indicated either support or were merely seeking information about the proposal but did not take a position;**
- **38% indicated concerns or non-support**

It is immediately apparent that Mr Gregg has falsely conflated those residents seeking additional information (due to the lack of a public meeting) with those indicating support for these additional electromagnetic field (EMF) connections.

And exposures.

Even worse, his representation to you *omitted mention of a petition* submitted to Rogers and the Islands Trust. Collected in just four hours during the winter holidays, 19 Petition sheets were signed by 278 remaining “resident voters of Hornby Island.” Noting how “a selfsame earlier request by Telus.ca was equally voted down!” hundreds of petitioners declared that the undersigned “Do not provide written or verbal consent to this proposal!” (petition emphasis)

Additionally, at least 50 additional respondents expressed their tower opposition, but were afraid to make their views publicly known. Mr Gregg’s statement would more correctly read: “There continues to be overwhelming community opposition to cell towers on Hornby Island.”

Concerning Brian Gregg and his client’s egregious bad faith, Trustee Chair Tim Peterson noted that our disregarded “petitions were a very good indicator.”

Such underhanded tactics were exposed as early as Nov 23, 2022, when trustee Alex Allen was alerted to a notice of the Rogers tower proposal appearing in an off-island newspaper. As FOIA documents obtained by this reporter disclosed, Mr Allen immediately emailed Brian Gregg:

*Dear Brian,*

*First, I am quite dismayed that I and my fellow local government representative, Grant Scott, have only just heard of the Rogers Cell Tower proposal from community members in the last two days. This is completely unacceptable.*

*The timing is so wrong and way too fast tracked. So many people are now traveling off island in the next month. A virtual meeting in December and the deadline for comments January 13? That is, with all due respect, ridiculous. And the virtual information meeting is December 6 where Grant and I have a Zoom Trust Council for three days starting on that day. No communication let alone consultation with either of us.*

*I am asking you to delay this whole proposal process until at least March 2023.*

The Executive Director of the Hornby Island Residents & Ratepayers Association also responded to Brian Gregg’s unwelcome surprise. After emphasizing how *Many year-round residents are away at this time of year*, Daniel Siegel continued: *There have been too many places where correct protocol has not produced the desired results. This includes the fact that our trustees had not been informed of the application when you went to the Islands Trust staff.*

Regarding this “inopportune” timing, Mr Siegel observed: *Many year-round residents are away at this time of year. Further, our community is dealing with many profound changes already (including a housing shortage, the pending arrival of fibre optics, and significant proposed changes to our OCP). It therefore seems that this is not the right time or approach and I suggest that Rogers withdraw the application for now and allow our community to work on the issues we are already facing.*

The Concerned Residents of Hornby Island (CRHI), of which I am a founding member, pointed to 4,000+ STARLINK satellites passing overhead. Elon Musk's orbiting "constellations" are currently offering full wireless connectivity to Hornby Island and Rogers' BC customers.

CRHI also pointed out: *Cell phone coverage is already available in many areas throughout Hornby Island, via off-island already installed towers. In addition, CityWest is in the process of bringing vastly improved internet coverage, via fiber optic cable, to every Hornby Island residence that wants it. Our community voted 94% in favor of fibre optic over a cell tower.*

Mr Gregg's response: "I think the best course of action at this stage is to proceed."

Tellingly, by November 2022, the Islands Trust planning staff and Brian Gregg had notified ISED, Comox Valley Regional District (CVRD), K'ómoks and Homalco Nations, RCMP, WLRS, Telus, FOR:EX, two Islands Planning directors, and others of the Rogers tower application. But Hornby residents and our own LTC *were not informed of a problematic industrial structure intended to dominate the heart of our island.*

Only those few households who received Rogers' second (Trust-ordered) mail-out learned that this 205-foot (65 meter) tower would incorporate flashing white and red beacons, as well as "two steady burning" red lights more than 100-feet up — thereby ruining forever our prized nighttime views, in addition to blighting the daytime viewscapes that attract so many visitors to Hornby. Brian Gregg had earlier assured this community that no such lighting would be required.

There is nothing unusual in Rogers violating local bylaws. Indeed, as many island communities can attest, it is standard procedure. Teri wrote from Qualicum Beach to say: *Brian Gregg did not follow requirements to get the consent from some neighbours whose homes are very close to the site, where BG's new tower is erected, in Qualicum Beach, off the Old Island Highway. People fought back on this, but the tower went up.*

According to Teri, Mr Gregg did hold a public meeting, but it *was hard to find in the paper, and was unexpected. I understand it was a meeting where Brian Gregg took control, and people were not heard.* In an assertion to which many Gulf Islanders — including this writer — can relate, Teri further stated: *BG ignored most of my letters, and those he read, he always had an excuse/reply. It seems he put the onus on me, claiming I did not follow the rules that he had set.*

*He repeatedly misinformed the public. For example, he 'rallied' support through fear that people couldn't contact emergency services, so needed this tower. He did not inform people that they could get emergency services on their phones, as other providers covered the area.*

Longtime Salt Spring Island resident Oona McOuatt complained how "Rogers falsified their application to construct a cell tower in the midst of our medium density residential neighbourhood."

Writing on behalf of the Concerned Residents of Channel Ridge, lawyer Julian Clark added: *This supposed premiere company has not only bullied the local Channel Ridge community, but also run rough shod over the local government to avoid having to play by the rules.*

Setting arbitrary rules to stifle public participation is a tactic favoured by Rogers and their now notorious consultant, Brian Gregg. As Teri recounted, *When I realized what was going on, and wrote to BG, he told me that it was too late.*

Ditto, Hornby's 278 petitioners.

## **2. “Rogers will work with the province and ISED to ensure compliance with all applicable regulations.” (41)**

Now forced into our *third year* of this unwanted corporate assault, many here would like to know when this compliance might commence.

Mr Gregg states that he takes his direction from Industry, Science and Economic Development Canada (ISED). Yet, in his response to your office, this industry consultant failed to mention that Rogers and SitePath is in violation of ISED's own “minimum” [PUBLIC CONSULTATION REQUIREMENTS](#) mandated by the Comox Valley Regional District (CVRD), whose jurisdiction includes Hornby Island. (ISED's uppercase emphasis)

As set forth in the CVRD's [Telecommunication and Antenna Systems Application and Consultation Process](#): “The Proponent is to host a public information meeting in order to share relevant information with members of the public who may be affected by the proposed development. The public information meeting: *Should be hosted in-person.*” (my emphasis)

Empowered to “authorize telecommunications tower siting permits” under BC's Local Government Act, our LTC's siting protocols stipulate that for a tower exceeding 15 meters in height, “[A public information meeting](#)” is required.

Conveniently misconstrued by Mr Gregg to require only “virtual” online teleconferencing, public access to these technically flawed “consultations” was so restricted our own local government representatives were unable to log onto the first presentation. Subsequent difficult-to-access, glitch-prone Zoom video calls proved no substitute for the “public information meeting” required by our Model Antenna Strategy.

As Trust Regional Planning Manager, Kauer noted for the record on September 9, 2022: “The Model Strategy federally compels companies to engage in extensive public consultation before installation of cell towers.” Unhappily, Ms Kauer “forgot” to inform that public meeting of the Rogers application by Brian Gregg, with whom she was in email communication that same day.

Mr Gregg and Rogers Communications have to date held no public information meetings here, as required by ISED, the CVRD, Islands Trust, and our own Official Community Plan (OCP). Until this requirement is met, Rogers remains out of compliance with the required public notification process set down by four separate governing bodies and has no basis to request concurrence by the Crown.

This Rogers fixer explains his shyness by claiming that he “faced a lot of aggression” during his 2017 Telus presentation here. Paid handsomely to appear before the island communities he insults, slanders and misleads, Brian Gregg later wrote that he was upset over Hornby attendees “refusing to respect” his attempts to control the gathering “by setting up chairs in the middle of the room to host their own discussion” with other Telus reps. The senior who dared amend two of his posters with a Magic Marker later told me that Mr Gregg had okayed her corrections.

Brian Gregg claims that fears for his “personal safety” have kept him from performing an Telus encore here. Yet, he did not file a police complaint, nor express his concerns in 2017. Only after submitting his new client’s tower application *five years later* did Mr Gregg write that he had been advised by unnamed “leadership figures in your community that our security and safety cannot be ensured at such a meeting given some of the people potentially involved.”

Certain people? Some people? Potentially involved in what exactly? He cannot say. Fearing renewed public embarrassment in front of this well-informed community, Brian Gregg repeated his unsubstantiated assertions in a Feb 14, 2023 email. Questioned about this during a subsequent (taped) Zoom call, the Rogers consultant admitted that his personal safety was never threatened.

**3. “Rogers’ footprint on the land is minimal with a fenced compound of approximately 20 m x 20 m.” (39)**

In response to our objections that his proposed telecommunications tower would supplant critically needed worker housing, Mr Gregg has repeatedly stated, “The subject property is very large so there is plenty of space for housing or other uses.”

In fact, housing of any kind cannot be safely situated within the electromagnetic shadow of a continuously radiating cell tower. Section 59 of our OCP stipulates: “For safety, no dwellings permitted within... a maximum of (3) times the height” — 615 feet before tower extensions.

Many North American communities prohibit cell towers within [1,500 feet](#) of homes. Here on Hornby, the actual “coverage footprint” of the proposed Rogers cell tower would reach our community school, community hall, ballpark, recycling depot, credit union and health clinic.

**4. “Indeed, there is already a communication site from the local radio station and fire hall in the directly adjacent area.”**

Our permitted local “Radio Station” was cited no fewer than four times in Mr Gregg’s reply (39, 40, 41, 42) to justify his client’s intended EMF emissions. In fact, there is no equivalency between CHFR’s smooth [96.5 MHz](#) radio waves — broadcast at power levels equivalent to a 50-watt lightbulb — and Rogers’ proposed 2.4 GHz microwave tower omni-radiating 2.4 billion sawtooth pulses *every second*. Unlike our low-power community FM radio station, all this silent “cellular” jackhammering cumulatively disrupts the subtle electrical bio-signals regulating the life processes in all living beings, including humans.

Not until Sept 8, 2023 did we learn from an Islands Trust Staff Report that Rogers intends to provide tower space to eight mobile service providers — Telus, Koodo, Public Mobile, Bell, Virgin Mobile, Rogers, Fido and Chatter. As Trust planner Margot Thomaidis enthused, “Nearly every service provider other than Freedom Mobile could be serviced.”

To borrow Mr Gregg’s frenetic formatting: **An 8-antenna cell tower is NOT a neighbourhood radio station.**

5. **“Given that Rogers is a company regulated by the *Radiocommunication Act*; the subject proposed facility is intended to service Hornby Island; and the proposed use appears to be permitted in the Hornby Island Land Use Bylaw...”** (41)

Not so.

Section 5.5.4 of our Official Community Plan, does stipulate: “All public service and utility installations on the Island should be for servicing Hornby Island only.” But the 4G LTE antennas on the same tower could blanket [50 square miles](#), reaching out across the Salish Sea, as Mr Gregg has boasted. Local resident Gina-Rae wrote to him, saying, “Hornby Island is NOT the place for your tower. We are a tiny rural island. We are about 6 km wide, and we have NO place for your Rogers tower anywhere.”

6. **“The Rogers’ facility as proposed will readily comply with Health Canada’s Safety Code 6.”**

This endlessly repeated industry incantation is cause for real alarm. As Safety Code 6 concernedly warns, “*electric and magnetic field exposures can induce internal electric fields (voltage gradients) within biological tissue.*” (my emphasis) Health Canada further informs us that the resulting “spontaneous depolarization” from wireless signals up to [300 GHz](#) can *reverse* the polarity of the bio-electrical whispers regulating human cells... at just 62 to 88 Hz.

How is this “safe”?

A Report by the Standing Committee on Health, [RADIOFREQUENCY ELECTROMAGNETIC RADIATION AND THE HEALTH OF CANADIANS](#), submitted to Parliament in June 2015 (shortly after the most recent Safety Code 6 revision), cited “a number of witnesses” who expressed concerns that the panel lacked a single biologist and “had insufficient expertise in epidemiology.”

Peer reviewer, Dr. Anthony Miller further noted: “the panel was conflicted,” “did not have adequate time to do a full review of the data,” and “did not do a detailed evaluation of the studies” — a situation which, according to Dr. Miller, led them to “false conclusions.”

An explanation for these oversights was provided by Prof. Dariusz Leszczynski, who informed the Standing Committee: “Some of the experts [on the panel] are known to advise the telecom industry. This is a serious potential conflict of interest.”

Parliamentary material provided by Canadians For Safe Technology revealed: *Some members turn out to have [financial relationships with companies, industry associations and lobby groups](#) which are directly affected by the outcome of this panel review. At the same time, some of them have consistently published material and statements demonstrating predetermined viewpoints that they don't believe [published evidence](#) showing that humans are in danger well below the existing safety threshold published in Safety Code 6.*

Indeed, Dr. Meg Sears, Adjunct Investigator at the Children's Hospital of Eastern Ontario Research Institute, declared, *[a] lot of the recent research demonstrating potential harm was omitted from reports that supported Safety Code 6.* In fact, while preparing its 2015 Safety Code 6 “update,” [Health Canada ignored more than 130 studies](#) demonstrating how invisible “electrosmog” from wireless devices at very low levels can cause biological harm.

Of special concern, Europe's Building Biology scientists report, “[No country's RF guidelines provide less protection than Canada.](#) China, Russia, Italy and Switzerland have wireless radiation safety limits 100 times safer.” At least [40% of the world's population lives in countries with codes safer than Canada.](#)

While admitting “the induction of internal electric fields” in the human body from wireless radiation as slight as [100 kilohertz](#) (kHz), Health Canada assures us that inconvenient test results are “averaged” or “filtered” out before arriving at “the maximum induced electric field strength in the body or organ of interest.” Such as brains, eyes, wombs and hearts.

Is Rogers concerned about these health impacts?

Appearing before Quebec's Superior Court on February 20, 2013, Rogers corporate attorneys attempted to get expert witness testimony and all other references to health thrown out of court.

**7. “Rogers has been advised by the Impact Assessment Agency that the *Impact Assessment Act* (IAA) sets out the federal process for assessing the impacts of certain major projects [including] National Parks and Protected Areas.”**

In excusing his client from conducting an Environmental Impact Assessment, Mr Gregg evidently forgot to mention that Rogers’ proposed site on Crown Land abuts Mt. Geoffrey Provincial Park and is located within Area IIA. Considered an “Environmentally Sensitive Area” in our OCP, Area IIA is listed as a region of “high vulnerability”.

Not coincidentally, on Jan. 13, 2021, the US Court of Appeals in the District of Columbia ordered the US Federal Communications Commission to explain why it ignored scientific evidence finding harm to trees and wildlife from wireless radiation. Unfortunately for our beekeepers and bird lovers, the ruling cited a 150 page metastudy of [more than 1,200 peer reviewed studies](#) showing that birds, bees, butterflies, insects and animals are especially sensitive to wireless pollution.

Another meta-analysis of 45 peer-reviewed scientific publications concluded that nine-in-ten plants exposed to wireless radiation show [“physiological and/or morphological effects.”](#) [“These effects have been observed in birds, insects, amphibians, reptiles, microbes and many species of flora.”](#) a subsequent study noted. “Wildlife loss is often unseen and undocumented until tipping points are reached.”

Worryingly, wildlife [research on Radiofrequency Radiation](#) details abnormalities in reproduction and behavior of birds nesting near cell towers, as well as the magnetic compass orientation in migrating birds encountering the same electromagnetic fields. Bees are especially susceptible because of their small size, their inability to thermo-regulate when heated from electromagnetic radiation, and the way RFR interferes with their magnetoreception for navigation.

Trees also act as receiving antennas for cell tower frequencies. EMF-conducting forests surrounding the proposed Rogers tower include sap-filled Douglas fir, Western red cedar, western hemlock, lodgepole pine, maples, alder, dogwood and others.

A German tree study conducted over 16 years (2005 to 2021) catalogues disturbing before-and-after illustrations of [Tree Damage Caused by Radiofrequency Radiation](#). In St. Ingbert, for example, damage was shown on the side of a tree facing a mobile phone mast 656 feet (200 meters) away. The leaves of a linden tree in front of Seehof Palace were crisped by a tower 920 feet (280 meters) away. Trees in Frankenwald were severely wilted at an exposure distance 2,460 feet (750 meters). And so on.

“In the vicinity of *all* mobile phone base stations we visited, we found RF radiation-related tree damage,” reported Cornelia Waldmann-Selsam. (my emphasis) “We found crown damage on all four sides of trees” at distances up to 230 feet from a mobile mast (page 13). The eight transmitters slated for the proposed Rogers cell tower would radiate at or above crown height.




Despite having performed zero Environmental Impact Assessments of continuous electromagnetic radiation exposure to surrounding forests, wildlife and Hornby hikers, ISED blithely assures us that this industry lobby [“considers the effects on the environment and local land use before towers are installed.”](#)

In their dreams perhaps. As Suzanne Schiller reminded Bernie Reis on behalf of the Vancouver Island Safe Technology Alliance on March 23, 2023, *How can ISED consider effects on the environment when it doesn't know what RF-EMR exposure limits are safe for the environment and for wildlife because no safety limits have been established?*

All living creatures are highly conductive antennas. If a mobile phone is receiving a cell tower signal pulsating at 24, 36 or 50 billion-times-per-second — so are we. And so are Hornby Island's trees, birds and insects.

Who will act for them?

In closing, I wish to thank you again for your time and attention to a matter crucial to all inhabitants of Hornby Island.

Respectfully,  
*William Thomas*  
Hornby Island  


cc: Robyn Thomson, Natural Resource Specialist, FrontCounter BC  
Ian Cox, Islands Trust Northern Region Planner 2  
Hornby trustees: Tim Peterson, Alex Allen, Grant Scott