

**Date:** February 21, 2020 at 11:42:23 AM PST

**To:** [bobrogers4areaE@telus.net](mailto:bobrogers4areaE@telus.net)

**Subject:** Moorcroft

Neil Westmacott asked me to forward this to you as “late correspondence” for the Feb 25 RDN meeting.

Thank you  
Bob Gougeon  
Nanoose Bay

Feb 19/2020

**Re a proposal by the RDN to permit homeless people to camp in select RDN parks**

First and foremost, it must be understood that a Supreme Court determination states that it is the right of all to have a safe place to sleep, and that public parks may be used by someone who has no other recourse.

Second, various levels of government have to be proactive in addressing the possibility that someone needs a place to sleep, or anarchy and confrontation might ensue. It is absolutely correct for the RDN to consider a bylaw concerning where and when someone may utilize select parks for shelter. The question which begs an answer is “What parks, when and what monitoring is needed, and what resources must be allocated?”

Regional district parks are set up for a variety of purposes: walking parks, dog off-leash parks, sports parks, protected areas and so on. Not all parks have illuminated washroom facilities, and thus cannot be safely used for camping.

In our backyard, Moorcroft has had a history as a camp owned by the United Church, and has pit toilets, and so at first glance might seem a natural for homeless camping. However, it falls short on many levels.

Moorcroft is primarily a reserve, and preservation of what could be loosely be called “nature” is at its core. There are covenanted areas where no one is permitted to enter, and trails are closely controlled to avoid having random *ad hoc* trails creating stress for wildlife and plants in sensitive areas. Permitting camping, especially camping without on-site supervisors will result in a degraded park in short order.

Moorcroft is off the beaten track. This means that it would not be readily accessible to someone who needs overnight shelter, unless that person has a vehicle. Anyone who sets up camp in Moorcroft would find it very difficult to remove their personal property, leave and then find their way back again in the evening. As there would not be any restriction on someone being in the park or nearby Crown Land without their shelter being up, my guess is that some people would take up residency at one of the tables or nearby Crown Land and just wait for 7 pm to set up a shelter again. Unless there were RDN patrols to ensure that shelters were not set up early, there would be consistent pushing of the time envelope, especially in rainy weather. In other words, campers would be permanent residents in short order.

There is a significant history, as evidenced in Beacon Hill and Stanley Park and others, of excavated semi-permanent dwellings occurring, with significant potential for erosion and contamination. These excavations are always hidden and are a source of pollution and fire risk and have even become criminal operations.

Moorcroft's isolation means that a camper would have difficulty in feeding himself. There are no grocery stores anywhere near the park, meaning that anyone without some sort of transportation could not get even the most basic provisions. It would be a burden for campers and expose neighbours to potential theft and/or begging. Cooking facilities in Moorcroft are non-existent, and open fires would immediately become a danger.

Moorcroft Park is part of a Georgia Strait Forest, consisting of arbutus, fir, Garry Oak, cedar, alder, salal and so on, and is characterized by dry, and becoming drier, summers. For the past decade or so, there has been consistent die-off of the park's cedar, leaving behind a legacy of tinder-dry standing and fallen trees which constitute a huge potential for fire. BC Forest Service, Nanoose Bay Volunteer Fire Department and neighbours will not be able to contain any fire which breaks out in Moorcroft before there is widespread devastation of the park and neighbouring houses. This cannot be emphasized enough. This jewel of a park is very fragile and should be shut down completely in the driest of seasons, and must never be at risk from anyone who might start a cooking, heating or "ceremonial" fire. Even enforcing a ban on smoking would be impossible if homeless people are occupying the park, despite the fact that smoking of any sort is routinely banned in the summer.

Part of the reality of a Georgia Strait Forest next to the ocean is wind. There is often a wind, strongest near the water, which is cold, even in summer. The result is that the best locations for a sheltered campsite would be inland. However, the nature of the dying cedars and the fragility of Douglas Fir means that any strong wind renders the whole park dangerous due to branches and whole trees falling. Nobody should be walking in the park during a wind storm, and the liability of the RDN for injuries would be significant.

The Regional District of Nanaimo does not have the manpower in its Bylaw Enforcement department to provide the level of supervision needed for even the most controlled of locations. Moorcroft is a large park with a multitude of places a determined person can utilize to avoid detection while not following any rules the RDN might impose. Similarly, it may be a shock for many to realize that the RCMP usually has about four nighttime single-officer patrol vehicles and no canine units spread out between Nanoose Bay and Qualicum Bay. No one can rely on the RCMP for regular patrols, or, indeed for timely intervention if someone is refusing to obey the rules or if local residents and residences are at risk from trespassers. The Nanoose Bay Volunteer Fire Department consists of a limited number of private individuals, and cannot be expected to intervene as the Nanaimo Fire Department did in attempting to control fire hazards from the "tent city" which sprung up there.

It is unnecessary for me to go on at length about the abuse of alcohol or drugs which exists whenever people are without resources and who are dealing with possible emotional or mental problems. Moorcroft isn't a safe or suitable place for anyone with such needs.

I would not wish anyone to consider that I or my neighbours do not have compassion for homeless people. Just providing some place to camp without ensuring that campers and neighbours are safe from harm, harassment, fire, theft, or violence would be an abrogation of the responsibility which any

government has, whether local, provincial or federal. If the RDN is serious about providing needed relief to homeless people, there must be a significant allocation of resources.

Any chosen park must have illuminated washrooms, provide safe cooking facilities which do not require cutting firewood, supervise campers all night to ensure their safety and the safety of all, be readily accessible to ambulance, professional fire departments and police without any easy escape routes for troublemakers to flee while still providing safe emergence exits, and provision of mental health professionals on-site. In other words, don't assume that just providing a space is all that the RDN needs to do. Properly providing temporary housing, be it tents or shelters isn't cheap and the RDN must provide a safe alternative to sleeping rough on the streets. A bylaw permitting camping in a park is inadequate without the budget and determination to make it a success.

Whatever the RDN decides to do, Moorcroft Park isn't a safe or suitable location.