



## Interior Health

March 27, 2023

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Sent via email: [tvandewiel@rdek.bc.ca](mailto:tvandewiel@rdek.bc.ca)

Ms. Tracy Van de Wiel:

**Re: OCP and Zoning Amendment, Lizard Creek / CH Nelson Holdings - Galloway. File No - P 723 101**

Thank you for the opportunity to provide feedback on the OCP and Zoning Bylaw amendments for the most recent proposal for development of the Galloway Lands. We understand the applicant is seeking these amendments to facilitate subdivision of approximately 90 residential acreages and the creation of a large conservation/recreation lot that will be transferred to a conservation group for ownership and management. It is clear that this new proposal considers many of the issues that were raised by community partners and other agencies in relation to the proponent's earlier applications, however the local housing crisis has still not been addressed.

As previously, we do not feel comfortable endorsing the proposed OCP designation and zoning amendments because of a fundamental disconnect between the current and projected housing needs in the area, and the suggested development. As stated in our other two letters pertaining to prior versions of this referral, dated December 15, 2021 and May 6, 2022, Interior Health supports community development that aligns with [healthy built environment principles](#) – principles that have evidence-based links to positive population health outcomes and healthy communities.

In the [Regional District of East Kootenay Elk Valley Rural Subregion Electoral Areas Housing Needs Report \(2021\)](#), the following themes emerged throughout the engagement process: **lack of affordable rental and ownership options and stock; increasing costs of maintenance, utilities, and materials; lack of housing for tourism and hospitality sector employees; and lack of seniors' and low-income housing options.** The proposed development does not address any of these very real and mounting concerns.

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.

Housing plays a significant role in influencing people’s health – living in affordable, safe, and stable housing is associated with many positive physical and mental health outcomes. Complete and connected neighbourhoods with more diverse housing options are principles for creating healthier, more equitable and more sustainable communities. The proposed development does not contribute well to either the Elk Valley or the greater Fernie area achieving Healthy Built Environment principles because it includes a relatively high number of low-density, single-family homes in ‘green-field’ development that require a vehicle to access daily amenities.

When a dweller is required to pay more than 30% of their gross monthly income on housing, it is unaffordable because there is not enough money left over to pay for other building blocks of health such as nutritious food, child care, or health-related activities like dental care or physiotherapy. People who cannot afford suitable, stable housing have higher rates of chronic disease, mental health issues, and hospitalization. Housing and health go hand-in-hand.

The [2020 City of Fernie Housing Needs Report](#) states that, “**Housing affordability was the biggest concern for nearly all respondents.**” The type of housing needed in the Elk Valley and the Fernie area is affordable for those who live and work in the region. Employers are struggling to hire and keep their businesses running because they cannot attract and retain staff who can’t find a place to live. Even large employers are facing staffing challenges related to the housing crisis. [The Elk Valley Business Retention and Expansion Report](#) states that the lack of low-cost housing is deemed, “**a huge barrier to economic growth.**”

The applicant has proposed connection to the Fernie Alpine Resort Utility to provide potable water to the development lands. To ensure compliance with the *BC Drinking Water Protection Act*, the water supplier must provide an updated capacity report which determines peak pumping rates and daily extraction volume available from the existing groundwater wells. This capacity report must also indicate if the current treatment equipment is capable of the additional flows and the reservoir has sufficient storage capacity. An Interior Health construction permit must be obtained before commencing alterations or extensions to the water supply system.

In closing, there are still some concerns that would need to be addressed before IH could fully support this proposal. We are conflicted because although improvements have been made in this updated proposal, the development does not address the fundamental housing needs in the area. Interior Health is committed to working collaboratively with the RDEK to support healthy, sustainable rural community development and land use planning and policy creation. In rural settings, we recommend clustering density toward settlement areas, and maintaining the integrity of large parcels of land.

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Sincerely,



Kerri Wall, MA  
Community Health Facilitator  
Healthy Communities, Healthy Families



Jennifer Beverley, CPHI(C)  
Specialist Environmental Health Officer  
Drinking Water Systems Program

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