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March 19, 2026

To: Comox Valley Regional District Directors and Staff

**The Island Rail Corridor Shared Vision Process  
and South Extension of Water/Sewer Lines**

Dear CVRD Staff and Directors,

**The Issue**

The Comox Valley Cycling Coalition ("CVCCo") is writing to express its concern regarding current plans to utilize significant portions of key roadways (including Highway 19A and Cliffe Ave) for the construction of water and sewer lines southward to Royston, Union Bay and K'omoks First Nation Lands. Both pipelines are very critical and necessary projects; however, the current routing will cause severe traffic disruptions as they move into construction phases in 2027 and beyond.

We note that the CVRD is also working on a shared vision process to gather input on possible alternate uses for the Island Rail Corridor ("IRC"). **We would propose that the rail corridor provides the opportunity to move two major utility lines away from a busy traffic corridor as well as the extension of a Multi-Use AT Pathway southward from 29<sup>th</sup> Street.**

CVCCo would respectfully request that the CVRD move to immediately open a public consultation on the Shared Vision project for the rail corridor. There is a short time window to bring these projects together and ensure that traffic disruptions and project capital costs are minimized. Placing these pipelines along the rail corridor would also ensure that active transportation needs connecting Area A and the City of Courtenay are addressed.

**Background**

- The rail corridor is currently unutilized, in poor condition and severely overgrown. There is no plan to revitalize or use the corridor.
- The CVRD received a \$600,000 grant from MOTT in 2023 to instigate studies and evaluate alternate uses for the rail corridor. To date, a Background Report has been developed and the CVRD website states that public engagement was to have been completed this past winter. To our knowledge, this has not yet occurred, and the grant funds will be expiring soon - it is imperative that studies be initiated asap.
- The CVRD Water South Extension Project is in design phase with construction planned for 2027. This project will link the new water plant supply to Royston (replacing the Cumberland System) and the KFN south lands near Union Bay. The proposed routing is on the attached map which also indicates the south sewer line route and rail corridor.
- The south sewer line extension is proposed to be built out in several phases which, combined with the water line work, will result in major traffic issues on Highway 19A

- over many years in the near future.
- In the past few years, the 5<sup>th</sup> St Bridge Rehab and Sewer Conveyance Forcemain projects have resulted in serious disruptions of traffic for Comox Valley residents and visitors. Residents realize that infrastructure needs to be built but they are extremely tired of traffic issues – especially ones that can be virtually alleviated by moving the utilities onto the rail corridor.
  - Residents are widely in favor of an active transportation trail within the rail corridor south of its current terminus at 29<sup>th</sup> St. The only question remaining is whether it is better to build the trail beside, or on, the rail bed.
  - With water line design ongoing and MOTT grant funds having a short fuse, time is of the essence to investigate how the rail corridor can be best utilized.

### **Ideas to Utilize MOTT Shared Vision Grant Funds**

In order to allow a full analysis and make knowledgeable decisions regarding future use(s) of the rail corridor, additional information is required. This critical work could be funded by the \$600,000 MOTT grant that was provided in 2023. Following are suggested areas of expenditure that require evaluation to assist in decision making.

1. **Public Consultation** – immediately open up to gather public input as to best uses for the rail corridor. This is especially important in the areas adjacent to the corridor within CVRD.
2. **Clearing** - The rail corridor within the CVRD is seriously overgrown with trees, grass, Scotch Broom and other invasive materials. This presents a dangerous fire hazard and may also encourage encroachments or illegal use of the corridor. No matter what use the corridor will be serving, it is critical that the ROW gets cleared at the earliest opportunity. Using Shared Vision and/or Fire Smart funds to make that happen would be a very visible and sensible action. This step is required no matter how the corridor is to be utilized and should be prioritized before drier weather restricts work access.
3. **Suitability for Utilities** – An engineering assessment of using the rail corridor routing for the proposed sewer and water line extensions needs to be completed. How can water and sewer lines be accommodated along with an AT trail? The WSP Engineering report of 2024 to CVRD suggested that there were uncertainties the sewer line using the rail corridor such as: unknown ground conditions, jurisdictional requirements, access issues and environmental impacts due to extensive tree clearing. Concerns have also been raised regarding slight line pressure requirements due to elevation differences. These “uncertainties” can all be understood with some suitable due diligence and are likely not material enough to deter re-assessing the routing onto the rail corridor as compared to the benefits associated with moving off major roadways.
4. **Trail Routing and Construction Costs** – In 2010, Lanarc completed a detailed study of trail construction feasibility beside the rail bed within the CVRD which identified six bridge crossings where it was not practical to install a separate footbridge. This resulted in a total of 8km of detours (back to Highway 19A) on 30% of the trail route. The Lanarc Report needs to be reviewed and updated for current costs, and also to add costs for surveying, engineering, project management, footbridges and detours. The feasibility,

usefulness and safety of an AT trail with this number of diversions needs to be understood.

5. **Process Required to Convert Rail Bed for Trail Use** – If the rail bed is used for a trail surface, the rails and ties need to be removed and any contaminated sites require suitable remediation. Phase 1 and 2 Environmental Site Assessments are critical to clarify if any areas require remediation and estimate those costs. A review of other similar rail trails can be undertaken to better understand the processes and costs of converting a rail bed to an AT trail. This information, in combination with #4 above, will assist in determining where the trail should be located within the ROW.

The rail corridor provides incredible opportunities that need to be understood as soon as possible in order to take advantage of the benefits. We do see this as an urgent matter due to project and grant timelines and are hopeful it can be prioritized accordingly.

The Comox Valley Cycling Coalition is very grateful for the opportunity to express our thoughts on this complex project, and we would be happy to help in any manner you may deem appropriate. If you have any questions or comments, you can reach us at [cyclecv@gmail.com](mailto:cyclecv@gmail.com).

Sincerely,

Comox Valley Cycling Coalition  
Board of Directors

c.c. City of Courtenay Council and Staff  
K'omoks First Nation

Attachment – Map of Water/Sewer Pipeline Routes

