



TOWN OF
COMOX

Town of Comox Accessibility Assessment and Action Plan

February 2025

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INTRODUCTION

The *Accessible BC Act*, passed by the Province of British Columbia in 2021, requires local governments to establish an accessibility committee, create an accessibility plan, and obtain public input on accessibility.

The Town of Comox Accessibility Assessment and Action Plan serves as a roadmap for identifying, eliminating, and preventing barriers within the Town. It aims to align with the requirements of the *Accessible BC Act*.

The Comox Valley Local Government Accessibility Framework (the Framework) was created in collaboration with local government staff, the Comox Valley Social Planning Society, and the Comox Valley Accessibility Committee. It outlines common principles, guides local government plans, and designates the Comox Valley Accessibility Committee as the official regional committee. This Committee is run by the Comox Valley Social Planning Society and funded through the CVRD's general administration service, in which the Town is a participant.

The Town of Comox plan was crafted in consultation with the Comox Valley Accessibility Committee. Feedback on this initial plan will be used to update or amend the plan and assist with prioritizing items. Throughout its development, the principles of inclusion, adaptability, diversity, collaboration, self-determination, and universal design, as outlined in the *Accessible BC Act*, were carefully considered. Recognizing that the plan will evolve, regular reviews will be conducted, guided by input from individuals with lived experience and/or expertise in accessibility issues.

The Town encourages continuous engagement and feedback regarding the plan and accessibility concerns in general.

Territorial Acknowledgement

The Town of Comox respectfully acknowledges that the land on which we gather and work is on the unceded Traditional Territory of the K'ómoks First Nation, the traditional keepers of this land.

About the Town of Comox

Comox, a coastal town on Vancouver Island, BC, Canada, is known for its vibrant community, stunning scenery, and diverse amenities. With a population of around 15,000, it offers an active, bustling downtown, beautiful marina, green spaces, and beaches. Situated in an area rich in agriculture and seafood, Comox enjoys a mild climate and provides ample recreational and

culinary opportunities, enhancing its reputation as a desirable place to live and visit. As part of the Comox Valley regional district, it is home to Canadian Forces Base 19 Wing Comox and the Comox Valley Airport (YQQ), adding to its appeal as a central hub in the region.

Demographics and Accessibility

The average age in Comox, according to the 2021 Census, is 48.9, with 31.9% of residents aged 65 and over, and 5% aged 85 and over. Statistics Canada's 2017 Survey on Disability revealed that 22.3% of Canadians aged 15 and over reported having a disability, with rates increasing significantly among older age groups. Specifically, the disability rate rose to 37.8% for those aged 65 and older, and 47.4% for those aged 75 and older. Given the correlation between age and disability prevalence, ensuring accessibility is vital to meet the needs of Comox's aging population and community demands.

Commitment to Accessibility

Comox is committed to fostering inclusivity by identifying, and striving to remove and prevent, accessibility barriers. The Town will do this through community engagement, working with the Accessibility Committee and implementing customized accessibility plans, which will demonstrate its dedication to creating an inclusive environment for all residents, visitors and workers.

This Accessibility Assessment and Action Plan builds on the foundation set by [Council's Strategic Plan](#), which states:

"Accessibility - We will support and embrace diversity and strive to make our community and services accessible and inclusive for everyone regardless of ability or background."

"Embracing Diversity – We support diversity and strive to make our community and services accessible and inclusive."

"Customer Service - Enhance customer service standards within our organization by providing better access to information, training tools and resources for staff."

"Parks - Our parks and greenspace connectivity enhances livability and walkability in the town and ensures seaside access for all."

"Recreation"

- *"We believe recreation is critical to community vibrancy, belonging, connection and health (safety) at all ages."*

- *“Focus on providing equitable access to community recreation through the LEAP and TRIP programs.”*
- *“Deliver youth recreation opportunities and continue to support the Comox Youth Council.”*
- *“Further enhance youth recreation opportunities through the construction of a pump track and development of skate park plans.”*

Definitions

Accessibility is the degree to which a product, service, program or environment is available to all.

The aim of accessibility is to consider whether a program, service or environment can be used by everyone however they may encounter it. (move up with accessibility)

A **barrier** is anything that prevents the full and equal participation in society of people living with disabilities. Barriers come in many forms, but some of them might be physical, architectural, attitudinal, technological.

Equity is the policy or practice of treating everyone fairly by; acknowledging each unique situation and person, accounting for the differences in each person’s starting point, ensuring equal opportunity, allocating the exact resources or support based on the need of the person that is required to reach an equal outcome.

The aim of equity is to ensure that every person has equal access to benefits or outcomes based on the specific needs of that person.

Inclusion is the practice or policy of involving and integrating all groups, especially those who have been historically excluded, who suffer discrimination or who live with disabilities.

Inclusion is the extent to which a person feels a sense of belonging and value within their community. Inclusion is a universal human right.

The aim of inclusion is to create, foster and sustain conditions that allow every person to be fully themselves, feel accepted and be treated equally.

Belonging is a feeling of being happy and comfortable as part of a group. Belonging is a positive relationship with other members of a group because they welcome you and accommodate you. Belonging is one of the most basic human needs and is crucial for good mental health.

The aim of belonging is to create space for people to be safe, seen, accepted, valued and connected.

KEY ACHIEVEMENTS TO DATE

Even though this is the Town's first formal accessibility plan, significant steps have already been taken in recent years to create and support a community where everyone is included. Notable initiatives include seeking funding through programs like the Measuring Up Program, supporting grant applications for projects such as those proposed by the Filberg Heritage Lodge and Park Association, and incorporating age-friendly community planning into the Official Community Plan (OCP). Efforts have also focused on specific areas like Kye Bay Park, where requests for improved accessibility have been acknowledged.

Recent developments include participation in programs like the Leisure for Everyone Accessibility Program (LEAP), which provides subsidized recreation access for youth and adults from low-income families. Additionally, there is an ongoing commitment to address accessibility concerns in various aspects of municipal operations, such as snow plowing policies and the creation of sidewalk snow-clearing assistance plans.

Policies:

- CCL-025 Property Tax Exemption Policy
- CCL-038 Town of Comox Wood Burning Policy
- CCL-042 Municipal Snow Plowing Policy
- CCL-048 Municipal Idling Control Policy
- CCL-050 Employee Wellness Policy
- CCL-051 Traffic Calming Policy
- CCL-056 Community Centre Visitor Code of Conduct Policy
- CCL-060 Council Meeting Video Recording Policy
- CCL-069.03 Affordable Housing Policy
- CCL-075 Warming and Cooling Centre Procedures Policy

Plans:

- Transportation Master Plan
- Official Community Plan
- Comox Building Bylaw 1472 (Age Friendly Planning & Resources)
- Comox Zoning Bylaw 1850 (Age Friendly Planning & Resources)
- Housing Affordability Strategy

Past and Ongoing Initiatives and Projects:

2007	Advisory Design Panel Representation	Comox applied for funding through the Measuring Up Program and collaborated with other local governments in the Comox Valley on accessibility matters. Additionally, development permit applications were forwarded to the Comox Valley Accessibility Committee for feedback on accessibility concerns.
2011	Filberg Heritage Lodge and Park Association: Support necessary to complete grant application process.	Assistance in finalizing a grant application to the federal government's Enabling Accessibility Fund, and a letter of support was provided to bolster the application.
2011	Official Community Plan	Age-Friendly Community Planning
2019	Recreation Building Assessment for Accessibility	In 2019, the Recreation Department secured a grant for a free Rick Hansen Foundation accessibility assessment. The building qualified for Accessibility Certification. Not listed in the registry due to associated fees.
2021	Recreation Access Program for Comox Valley Youth	One-year pilot of the regional Leisure for Everyone Accessibility Program (LEAP) to provide subsidized recreation access to youth (18 years and younger) from low-income families, in accordance with the program's guidelines.
2021	Downtown Vitalization Program	One goal of the Downtown Vitalization Program is to promote the development of high-quality residential spaces that are conducive to citizens "aging in place."
2022	Leisure for Everyone Accessibility Program Adults	One-year trial of the regional Leisure for Everyone Accessibility Program (LEAP) for adults, commencing January 1, 2023.
2023	Regional Recreation Assistance Program: LEAP – Youth	Council formalized the establishment of the regional Leisure for Everyone Accessibility Program (LEAP) to offer subsidized recreation for youth (18 years and younger) in low-income families subsidized, based on the one-year pilot program.
2024	Regional Recreation Assistance Program: LEAP-Adult	

2023	Solid Waste Assistance	Provisions to allow additional waste and assisted set-out service.
2023	Municipal Snow Plowing, Sanding, and De-icing Policy	Creation of Snow Angels Program, a sidewalk snow clearing assistance plan taking into account community connections and accessibility issues.
2023	Marine Services Building	
2023	Comox Valley Accessibility Framework	
2024	Website updates	Interactive map, links to commonly accessed documents to establish a centralized location for all accessibility information on the Town's website.
2024	Delegation - Increasing accessibility within the Town of Comox	Concerns about elevation changes without visual cues for individuals with visual impairments will be sent to the Accessibility Committee, the business community, and the downtown Business Improvement Association (BIA).
2025	Parks and Trails Master Plan	Update in progress
2025	Official Community Plan	Update in progress

BACKGROUND

Legislative Framework

In 2021, the *Accessible B.C. Act* was passed in the province to enhance accessibility throughout the region, requiring local governments to establish an accessibility committee, develop an accessibility plan, and create a mechanism for gathering public feedback on accessibility matters. In developing and updating the accessibility plan, the local governments must consult with its accessibility committee and consider the following principles: inclusion, adaptability, diversity, collaboration, self-determination and universal design.

Comox Valley Local Governments Accessibility Framework

On November 1, 2023, the Town of Comox Council adopted the Comox Valley Local Governments Accessibility Framework, developed in partnership with the Comox Valley Accessibility Committee, the Comox Valley Regional District, the City of Courtenay, and the Village of Cumberland. The framework aims to help local governments collect community

feedback to enhance fairness and accessibility in policies, bylaws, and infrastructure. It focuses on identifying and removing barriers to ensure that all programs, services, and infrastructure are inclusive for everyone, regardless of ability. The framework outlines common principles, guides local government plans, and designates the Comox Valley Accessibility Committee as the official regional committee.

Each local government will use the framework to create tailored accessibility plans and assessments, with the Accessibility Committee offering advice on identifying challenges and suggesting solutions.

About our Committee

To meet the requirements of the Accessible British Columbia Act and through collaboration with the Comox Valley Social Planning Society, the Comox Valley local governments and the Comox Valley Accessibility Committee have established a formal relationship and structure. Under this arrangement, the Comox Valley Accessibility Committee will serve as the Town's accessibility committee and advise and help the Town develop and update action plans and assessments based on the framework.

PLANNING METHODOLOGY

According to the 2021 Survey on Accessibility in Federal Sector Organizations, 75% of British Columbians with disabilities, difficulties or long-term conditions encountered at least one barrier related to accessibility (Statistics Canada, 2021). Although data from local governments is not available, Town of Comox residents with disabilities, difficulties or long-term conditions likely experience similar barriers in accessing Town facilities, services and information.

Disability Alliance BC identifies that barriers prevent a person from participating fully in their community. Disability type and severity can also impact a person's experience of barriers (Government of Canada, 2022). BC's Accessibility Plan identifies the following barriers (Disability Alliance BC, 2020):

Attitudinal – when people think and act based on false ideas, such as:

- making decisions about people with disabilities without including them
- not believing that a person with a disability can contribute to the workforce

Physical – when obstacles make access difficult, such as:

- a washroom with an accessible stall but no automatic door opener
- a meeting or public event in a space with no wheelchair access

Information or communication – when communication methods do not reach people with disabilities, such as:

- using small print or not providing large-print versions of materials
- videos, events, or meetings that do not have captions

Systemic – when an organization’s policies or procedures aren’t inclusive, such as:

- not providing an America Sign Language interpreter or captioning
- requiring a driver’s license for a position when another form of transportation could be used

Technology – when technology can’t be accessed by people with disabilities, such as:

- websites, documents, or databases that are not accessible for screen readers
- website graphs and charts that do not have text to explain them

Sensory – when lights, sounds or smells prevent participation in the environment, such as:

- co-workers wearing perfume in the workplace
- fluorescent lighting in public event spaces

THREE YEAR ACTION PLAN – Recommendations

Education and Awareness	
No.	Action
1	<i>Increase Town of Comox staff awareness about local disability support organizations.</i>
2	<i>Develop / implement educational materials on accessibility for staff training.</i>
Built Environment	
Built Environment - Facilities	
No.	Action
2	<i>Support agencies, organizations, businesses, and residents to promote accessibility for businesses.</i>
3	<i>Pursue funding for accessibility improvements.</i>
4	<i>Assess the accessibility of town buildings, including features such as automatic doors and public restrooms, and implement upgrades as resources allow.</i>

Built Environment - Parking	
No.	Action
5	<i>Review Accessible Parking spaces for Town facilities and downtown businesses. Develop accessible parking requirements and ensure parking spaces meet legislative requirements where practicable and feasible.</i>
Built Environment - Sidewalks / Crosswalks	
No.	Action
6	<i>Develop barrier-free sidewalk and crosswalk standards, ensuring new sidewalks and crosswalks meet these standards, and improve existing sidewalks and crosswalks to comply with these requirements.</i>
7	<i>Sidewalk on both sides of Beaufort Avenue, formalized parking areas and a shared bike/vehicle lane (CV Sewer Conveyance Project).</i>
8	<i>A new sidewalk on the south side of Balmoral Avenue from Stewart Street to Pritchard Street (CV Sewer Conveyance Project).</i>
Built Environment - Signage	
No.	Action
9	<i>Improve community signage to meet accessibility standards as resources allow (tactile surface indicators, indoor/outdoor, accessible paths of travel, wayfinding cues, lighting, audible beacons, large fonts & symbols).</i>
Built Environment - Parks	
No.	Action
10	<i>Assess & improve surfacing at high use nature parks (McDonald Park, Brooklyn Creek Greenway).</i>
11	<i>Assess and improve pathways within Parks for access from the street to the playground.</i>
12	<i>Provide pathway improvements at Highland Park Pickleball Courts.</i>
13	<i>Continue to install accessible picnic tables, benches and seating areas with ample space for wheelchairs.</i>

14	<i>Compile information about accessible infrastructure in parks, at pedestrian crossings, and at public facilities and integrate the information into the Town of Comox Interactive GIS map layer on the website.</i>
Built Environment - Transit	
No.	Action
15	<i>Coordinate with BC Transit to provide barrier-free bus stops on all accessible routes.</i>
Built Environment - Transportation	
No.	Action
16	<i>Incorporate accessibility in the next Transportation Master Plan review.</i>
17	<i>Upgrade, improve, and modify accessibility routes based on use, demand and proximity to common destinations for people with disabilities.</i>
18	<i>Continue to provide notice where feasible for operations that impact movement so others can plan their routes, and account for alternate routes for mobility during operations.</i>
Information and Communication Technologies	
No.	Action
19	<i>Establish a centralized list of accessible Town of Comox services and programs to be included on the Town's website.</i>
20	<i>Provide status updates on the progress of the 2025 Town of Comox Accessibility Assessment and Action Plan on an annual basis and ensure updates are posted on the Town's website.</i>
21	<i>Investigate and implement new and updated website content that complies with Web Content Accessibility Guidelines (WCAG).</i>
Governance and Services	
No.	Action
22	<i>Encourage and consider accessibility feedback when developing, delivering, seeking input on, or promoting Town services.</i>

23	<i>Continue to explore support options for residents, such as the existing Medical Waste Exemption and Assisted Cart Set-Out Service, alongside the Town's Automated Curbside service.</i>
24	<i>Apply an accessibility lens to updates and renewals of major public documents, policies and communications.</i>
25	<i>Continue to promote neighbours helping neighbours through initiatives and programs such as the existing Snow Angels program.</i>
26	<i>Collaborate with the Comox Valley Accessibility Committee to promote their material during AccessAbility Week.</i>
27	<i>Seek to understand the demographics of the users of Town services to promote greater participation and inclusion.</i>

IMPLEMENTATION AND REVIEW PROCESS

The Comox Accessibility Assessment and Action Plan 2025 will be reviewed annually and updated at least once every three years in accordance with the *Accessible British Columbia Act*. Updates will be guided by barrier-free design standards and input from the Comox Valley Accessibility Committee and the public.

The Town will provide updates on the Plan through its website and Council reports. Feedback from the public and Council will be shared with the Accessibility Committee as appropriate.

Recommendations from the Plan will be integrated into the Town's budgeting process, with implementation phased based on resource availability and alignment with scheduled maintenance or construction. The Plan will remain dynamic, reflecting community priorities through regular reviews.

NEXT STEPS

Looking ahead, the municipality is actively involved in initiatives like the Parks and Recreation Master Plan and the ongoing development of the Official Community Plan. These initiatives offer an opportunity for continued improvement to accessibility within the Town of Comox.

Grant funding is available from SPARC BC for implementing identified projects aimed at reducing barriers for individuals with disabilities. The Town will be applying for this funding after Council adoption of this Accessibility and Action Plan.

PROVIDING FEEDBACK

How to Provide Feedback

Feedback on the plan is welcome and can be submitted as follows:

- Online engagement Platform - <https://www.comox.ca/town-hall/corporate-services/accessibility>
- Email to Town@comox.ca
- Website comment forms on comox.ca
- Telephone 250 339 2202

RESOURCES

- [**Comox Valley Local Governments Accessibility Framework**](#)
- [**Comox Valley Accessibility Committee & SPARC BC Accessibility Review \(March, 2024 draft\)**](#)
- [**Accessible British Columbia Act**](#)
- [**Accessible British Columbia Regulation**](#)
- [**Accessible Canada Act**](#)
- [**United Nations Convention on the Rights of Persons with Disabilities**](#)