

July 18, 2012

Dear Mr. Brown,

I am writing in response to your request for comments with regard to the budgetary reductions proposed by Parks Canada and their impact on the Rideau Canal National Historic Site.

First, I would like to express appreciation for your efforts, along with those of your colleagues, in urging Minister Kent and the Parks Canada Agency to delay implementation of the reductions proposed for the Rideau Canal. I also appreciate your efforts now to solicit input from various stakeholders. It has provided an opportunity for the public to express our concerns about the impact of the proposed reductions in service and management of the heritage assets on this important National Historic Site and World Heritage Site.

I would like as well to re-iterate my general position with regard to the budgetary reductions. As you know from my previous correspondence, I have recognized that the current government has adopted as a key policy objective, the reduction of the Federal Government's deficit and I have not argued against this. However I have serious concerns about how Parks Canada management has chosen to distribute reductions through its mandated programs to the detriment of National Historic Sites and related programs

You are also aware that I anticipated well before the release of the budget, that Parks Canada would levy reductions disproportionately against the National Historic Sites, including historic canals, and related programs within its portfolio. From what I have been able to determine from information available to me, this has indeed occurred. You have focused in your inquiry on the proposed reduction in hours and season on the canals. But, this is only part of the overall picture. Parks Canada has significantly reduced -- by as much as 50% to 60%-- its Service Centre staff, the cultural resource specialist staff such as historians, archaeologists, conservators, and others responsible for ensuring the appropriate care of historical resources entrusted to its care. This is a particular concern for the Rideau Canal where there is some question as to whether Parks Canada will have the expertise, capacity and even the will to perform its stewardship responsibilities with regard to the world heritage site. In short, if the Parks Canada reductions go ahead as proposed, the Rideau Canal will not only experience a decline in service to the public but will also suffer from a diminished capacity to care for the resources of national and international significance entrusted to its care.

The proposed reductions have significant implications for the Rideau Canal National Historic Site and its surrounding communities:

- By proposing to cut back on canal operations, Parks Canada challenges the very basis underpinning the Rideau Canal's designation as a world heritage site. The "Statement of Outstanding Universal Value" emphasized the fact that the canal was still operational as one of the key reasons for its designation: eg. " It is the only canal dating from the great North American canal-building era of the early 19th century that **remains operational** along its original line with most of its original structures intact"[italics mine]. And " The Rideau Canal has fulfilled its original dynamic function as an **operating waterway without interruptions** since its construction" [italics mine]. There have been periods in the past when diminished

traffic may have led to thoughts of closure but because operations continued, the canal has survived -- through navigation is a key element of the canal's significance. It would be ironic if Parks Canada, a heritage agency, was responsible for its demise.

- Anticipating a reduction in hours and in the length of season, Parks Canada has sent out "affected letters" to most if not all lock station staff which means that their terms of employment may be changed. I am not aware of what the Agency wishes to achieve, but one concern is that it intends to convert lock masters and other lock staff to part time status. Certainly this is happening at other National Historic Sites across the system. The successful operation of the canal depends upon an experienced, mature and capable staff. I invite you to observe lockages at the Narrows Lock on a busy summer day with a heavy west wind to see how lock staff are challenged -- and meet that challenge. Or, observe how the staff manage lockages at any of the flights, in Ottawa, Merrickville, Jones Falls or Kingston Mills. It is a demanding job and I worry that if positions are converted to part time they will not attract the staff required to meet the challenges posed. Existing staff will leave to take up opportunities elsewhere.
- The cutting of cultural resource management staff at the Service Centres will severely hamper the ability of Parks Canada to maintain the resources on the Rideau Canal National Historic Site. For over a year Parks Canada has not been filling many of the vacancies created among its specialist staff located in the Service Centres, including that in Cornwall which provides support to the Rideau Canal, and with the follow-up to the budget has sent out affected letters to many of the remaining staff. As noted above, a key reason for the designation of the canal as a world heritage site was the fact that many of the original structures were still intact. Parks Canada was able to access "Canada's Action Plan" funding because it had many "shovel ready" projects and the specialist staff to guide the appropriate use of funds. Unfortunately many "shovel ready" projects remain unfunded -- see the photo essay on Jones Falls Lockstation on www.SaveOurRideau.ca. Previous reports by the Auditor General have documented the chronic under funding of the Rideau Canal capital budget. Further reductions in specialist staff and capital/operational budgets will jeopardize the integrity of the resources situated in the National Historic Site.
- The proposal to reduce hours and the length of the season contradicts efforts made by Parks Canada over the past several years to work with the private sector to encourage use of the canal in the shoulder seasons, thereby maximizing use of heritage assets, increasing visitation to the canal and more fully realizing its tourism potential. With this encouragement, private operators, both land based and water based, have made significant investments on the assumption that they would be able to realize a return over a full operating season; if anything, they were led to believe that the operating season and hours would be longer rather than shorter. The announcement that hours may be reduced and the season curtailed has already had negative impact on the market place as potential users hold plans in abeyance. Actual implementation of major reductions will lead to a permanent decrease in use; it will become the new reality.
- Municipal leaders from communities along the Rideau waterway have been participating in the development of a Landscape Strategy for the Rideau Canal sponsored by Parks Canada

and designed to elicit their support for the protection of significant resources under their jurisdiction, a follow-up requirement of the World Heritage designation. They view the historically significant Rideau Canal as an important social, cultural and economic contributor to their communities and therefore have been prepared to be actively involved in the landscape study. With Parks Canada threatening to cut back on canal operations and to reduce their capacity to manage and protect those cultural/historical resources under their direct jurisdiction, municipal leaders may question their own involvement.

The above factors represent important reasons to reconsider a decision to reduce the hours of operation and the season on the Rideau Canal and the capacity of the Agency to care for its heritage resources.

I would also add that I am a bit puzzled by your use of the term "mandate" in your press release of 10 July in which you point out: "The Rideau Canal has three mandates: water management, maintenance and locking boats. I am seeking solutions within these areas as well as ideas for the future that may include changing the mandates of the canal". I am not sure what you mean. The Parks Canada Charter, reflecting the legislation establishing the Parks Canada Agency, clearly identifies its mandate:

"On behalf of the people of Canada, we protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of those places for present and future generations."

Surely protection and presentation of the nationally significant Rideau Canal and its heritage assets represent the core mandate for Parks Canada. "Water management, maintenance and locking boats" are essential contributors to that end

Finally, I would like to comment as well on the way you have framed the situation presented to the public in your letter published in the Review-Mirror and in the EMC. In it you state: "However, this does not solve the *problem* [italics mine] for the future. The canal must find a way to reduce its expenditures or increase revenue". And elsewhere: "If you have any suggestions about how the Rideau Canal can *reduce its deficit*, [italics mine] or increase its income, I would appreciate receiving those as well." The reason there is a "problem" on the Rideau Canal or a need to "reduce its deficit" is because Parks Canada has chosen to levy a disproportionate reduction against the Rideau Canal. One solution therefore, is to revise the manner in which Parks Canada has applied reductions within its organization.

A very obvious alternative source of funds is the proposed Rouge Valley National Park. The Budget which announced cuts of 29.2 million dollars to Parks Canada announced the creation of the Rouge Valley National Park at a cost of \$143.7 million over 10 years with a budget of \$7.6 million per year thereafter. (Figures taken from the press release and background on the Parks Canada website) The rationale for the Park's creation was declining visitation at National Parks across the country. And so in the face of this declining visitation at its national parks, Parks Canada is spending significant funding on a "near urban park", a national park which does not meet the criteria outlined in the Parks Canada Systems Plan which guides priorities for acquisition; in fact the creation of the urban park threatens to involve the Parks Canada Agency

in the operation of what I would be tempted to consider a major municipal park instead of a part of the national legacy. Surely a more appropriate use of the funding would be the sustenance of an existing National Historic Site, recognized to be of world heritage significance, with its operating infrastructure already in place.

I hope that you will find these comments helpful.

I should also add that I have not yet received the information requested from Parks Canada through your office. As I have explained, the information would be indispensable in measuring the impact of budget reductions on the National Historic Sites and related programs within the Parks Canada portfolio. I had hoped that your personal intervention would lead to more success than my previous efforts. The fact that the information has not been forthcoming has only confirmed my suspicions about the disproportionate levy of budget reductions within the Agency. I am still hopeful that your efforts to get the requested information will be successful.

Yours sincerely,

George C. Ingram

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Township of Rideau Lakes