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Ron Hallman
President & Chief Executive Officer
Parks Canada Agency
30 Victoria Street
Gatineau, QC J8X 0B3

September 24, 2019

Re: Rideau Canal Issues including lack of Commemorative Integrity

Dear Mr. Hallman,

I am writing with deep concerns about the lack of commemorative integrity of the Rideau Canal National Historic Site and other issues relating to Parks Canada's management of the canal. The Rideau Canal has suffered since the re-organization into a waterways unit in 2012, including issues related to a lack of senior management based on the Rideau Canal, a lack of heritage presentation of the canal and a lack of public engagement with residents and stakeholders along the canal.

Lack of Senior Management on the Rideau Canal – the Rideau Canal has been, quite literally, under part-time management since the removal of a Superintendent for the Rideau Canal, replaced with a Director for both the Rideau Canal and Trent-Severn Waterway. This massive re-organization was done in 2012 with absolutely no public consultation and apparently with very little real-world understanding of the requirements of a large and complex system such as the Rideau Canal. The Director, has, since 2013, been located in Peterborough and this long-distance management has not worked. The first casualty was public engagement; something that was done prior to 2012 using several mechanisms including the Rideau Canal Advisory Committee (disbanded by Parks Canada in 2011 ahead of the 2012 re-organization). The second casualty was heritage since Ontario Waterways is not structured and lacks the resources to meet its commemorative integrity requirements. The Rideau Canal is not being managed as a National Historic of Canada, much less a UNESCO World Heritage Site.

The Rideau Canal needs a Superintendent equivalent position in residence in the Smiths Falls Office of the Rideau Canal. The person should be willing and able to do proper on-going public engagement regarding the many issues facing the Rideau Canal. It should be someone who has an understanding of commemorative integrity, someone who can properly deal with issues related to Parks Canada's core mandates of maintaining the ecological and commemorative integrity of the Rideau Canal NHS.

Commemorative Integrity – Public Education – the Rideau Canal NHS is currently not in state of commemorative integrity, mostly due to issues related to heritage landscapes and the lack of public education, both key components of commemorative integrity. Despite the Minister's directive to Parks Canada in early 2018 for "*an emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs*", it has only gotten worse on the Rideau Canal. There is no effective heritage

interpretation program, no public education program, the Rideau Canal doesn't even have resources to develop and implement any sort of program that would meet those commemorative integrity requirements. You've to look no further than Parks Canada's Rideau Canal website to see the problem – the tiny bit of history they have included (posted almost two years after their new website went up – their original website contained no history, no public education) is simply fluff history (with errors) and their website still does not contain any information about the National Historic Site designation of the Rideau Canal, a fundamental requirement of public education. UNESCO has similar public awareness obligations when it comes to World Heritage Sites, something that is not being done for the Rideau Canal World Heritage Site.

Commemorative Integrity – Heritage Landscapes – the integrity of the heritage landscapes of the Rideau Canal is a significant issue and a major component of commemorative integrity. Parks Canada lacks basic information about many of the Rideau's heritage landscapes, only a few sites have been cursorily studied and a Statement of Heritage Value is lacking for several lockstations (never done) and is out of date with incorrect and incomplete information for several others. You cannot protect landscapes if you haven't properly defined and documented all the heritage character elements of those sites.

Visual Values of the Rideau Canal – an ICOMOS recommendation in 2006, in the World Heritage evaluation report for the Rideau Canal, was to "protect the visual values of the Rideau Canal." By protection the author of that report meant legislated protection. This has not been done. In 2013 a consultant's report to identify the visual values of the Rideau Canal was released. This highly flawed report (Parks Canada has an expert review of that report detailing those flaws) is still being cited even though it falls far short and contains numerous errors. The Rideau Corridor Landscape Strategy, which was created by Parks Canada in 2009 to address the ICOMOS protection recommendation, has been allowed to lapse with the issues brought up by ICOMOS still outstanding. This lack of visual value protection is a looming threat to our status as a UNESCO World Heritage Site.

Science – directly related to commemorative integrity is an in-depth knowledge of the site, based on historical documentation and scientific research. Some of the most important sites on the Rideau Canal, including the engineering marvel of the Jones Falls Lockstation, have had no terrestrial archaeology done on them. Well documented facts are the basis of good decision making, particularly when it comes to commemorative integrity. Those significant gaps in our knowledge of the Rideau Canal NHS should be addressed by Parks Canada.

Public Engagement – as noted under Lack of Management, a casualty of the 2012 re-organization has been public engagement, with senior management not even willing to sit down and discuss heritage issues affecting the canal. As noted in the 1999 State of Protected areas "*Management at such sites [Dawson & Rideau] must rely on education and cooperative work with stakeholders in the larger community to ensure the commemorative integrity of the site.*" That statement remains relevant today, however this form of cooperation does not exist on the Rideau Canal. In 2010, a senior executive in Parks Canada stated, in reference to sites such as the Rideau Canal, that "*the agency must be willing to engage citizens both on their terms and on the basis of their needs and interests, as well as our own.*" It shouldn't be a foreign concept that Parks Canada should be willing and able to do continuous public engagement with citizens and stakeholders on the Rideau Canal.

Lack of Transparency – there is a serious lack of transparency when it comes to the management of the Rideau Canal. Simple questions often go unanswered and for others I have been forced to use Access to Information, a mechanism I really dislike having to use. Examples of ATI requests that shouldn't have been needed include a refused request for an organizational chart of Ontario Waterways and for the CRM evaluations of several sites related to the present infrastructure work. That information should be available to the public on the basis of a simple request. It's a symptom of an inward looking bureaucratic culture – something that needs to be changed.

Management Plan – in 2012, with the reorganization into Ontario Waterways, Parks Canada effectively threw out the 2005 management plan for the Rideau Canal. A new plan should have been done at that time since the re-organization brought in a new management structure and a new policy direction. Parks Canada has effectively been operating the Rideau Canal since 2012 without a management plan. We should have had a new plan in 2015 based on the new 10-year cycle of the plan, but that didn't happen. An on again, off again management process was started in 2016. Public consultations of a draft plan have been variously proposed by Parks Canada for 2017, 2018, 2019 and now, for 2020.

Currently the management plan is the only venue for public input. While one can be cynical about Parks Canada's management plans, given the fact that Parks Canada can apparently abandon them at will (as evidenced on the Rideau Canal in 2012), they remain a significant mechanism for public input. It is sincerely hoped that the consultations regarding a new draft plan, whenever that draft plan is made public, will be robust, meaningful and properly incorporate informed public input.

Working Group Recommendations – I trust that Parks Canada will take the recently released recommendations of the Minister's Working Group seriously, including the recommendation to make commemorative integrity a first priority in decision making, just as ecological integrity is supposed to be. The Rideau Canal needs an organizational structure that can ensure the commemorative integrity of the site, a structure that places commemorative integrity as a first priority in decision making. The Rideau Canal must be properly resourced with people that have a working knowledge and understanding of commemorative integrity, particularly as it applies to heritage landscapes and public education.

I would appreciate receiving a substantive reply from your office regarding the issues I've raised, something I've yet to receive from Parks Canada Agency. You can find an in-depth look at these and other issues on my Save Our Rideau website (www.SaveOurRideau.ca). I've also attached my latest report card regarding the heritage management of the canal (presently with an overall grade of D-) that I have posted on the home page of my Save Our Rideau website.

Yours truly,

<signed>

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cc. Hunter McGill, Chair, Friends of the Rideau
Save Our Rideau

RIDEAU CANAL HERITAGE REPORT CARD – September 2019

By Ken W. Watson

Item	Grade	Notes
<u>Site Management</u>	D	In 2012, the Rideau Canal and the Trent-Severn Waterway were merged under a single management unit. It was an experiment done under the false premise of cost saving that hasn't worked. Both the Rideau and Trent-Severn are very large multi-layered canal systems, with different needs, particularly when it comes to heritage. The Rideau continues to suffer from a lack of dedicated management and improper staffing. Read more ...
<u>Operating Canal</u>	B	Upgraded from a C in 2014 with the addition of extra hours. But still short of 2011 (pre-cuts) hours, particularly during the summer season. Lockstation staff service continues to be excellent (Lockstation staff get an A). Boats going through locks are a key component of heritage presentation of the Rideau Canal. Read more ...
<u>Heritage Interpretation</u>	D	Interpretation on the Rideau including physical (heritage landscapes, signage, brochures), personal (interpreters), and electronic (apps, web), is poor. The signage, brochures and limited personal interpretation that are available are generally good, elevating the rank from F to D. Read more ...
<u>Site Appearance</u>	C	Many of the lockstations look rundown. Peeling paint, excessive vegetation growth, spalling concrete and other issues serve to detract from the visitor experience at many lockstation. At the other end of the spectrum, some of recent restoration work has been done with a very modern appearance, degrading the heritage landscapes at those lockstation (and contravening Parks Canada's own Commemorative Integrity policies). Read more ...
<u>Maintaining Heritage Structures</u>	B	Upgraded from a D in May 2016 with the announcement of \$57 million (over 4 years) in additional infrastructure funding (on top of the \$46 million announced in 2015). Upgraded again to B+ in August 2016 with clarification by Parks Canada about all the projects being done (which weren't initially listed in public releases). Downgraded to B in February 2017 after frustrating Cultural Resource Management (CRM) discussions with Parks Canada. No "A" because: a) Not all Deferred Work is being done (i.e. Davis Lock, monoliths at Jones Falls), b) Parks Canada's Commemorative Integrity policies for heritage landscapes are not always being followed and c) The Rideau Canal still does not have sustainable capital funding as part of its base budget. Read more ...

<u>Heritage Landscape Protection</u>	D+	There are two components to this, the heritage landscapes of the lockstations (a Parks Canada Commemorative Integrity requirement) and the visual character of the entire Rideau Canal (a UNESCO World Heritage Site recommendation). The rank of D+ is a combination of a C for heritage landscapes but a D- when it comes to the identification and protection of the visual values of the canal. Read more ...
<u>Public Engagement</u>	F	Parks Canada does not consult with the heritage public on anything it does on the canal. This was a change from the 1990s and early 2000s when it did a very good job at public consultation (including a formal mechanism, the Rideau Canal Advisory Committee - which Parks Canada disbanded in 2011). This rating was upgraded briefly in 2016/17 with the arrival of a new Associate Director who did make an effort at some consultation. However, he left the Rideau in February 2018 and there has been no consultation since that time. Read more ...
<u>Public Education</u>	F	Public Education is a key policy component of Parks Canada's Commemorative Integrity of the site and also a significant requirement Parks Canada's management of the site as a UNESCO World Heritage Site. However, essentially no educational or heritage awareness programs about the Rideau Canal are being done. Read more ...
<u>Research & Archaeology</u>	F	Parks Canada does not do any heritage research or archaeology (as opposed to the 70s and 80s when much was done). In 2012 they surpluses (fired/let go) much of their heritage and archaeological staff (for the entire organization). They also shut down (removed) two local Parks Canada Rideau Canal libraries that aided local researchers. There remains a lot to do on the Rideau Canal, sites such as Jones Falls have had no significant archaeological work ever done on them. Read more ...
OVERALL - Parks Canada scores a solid D- (a score of 2.3 out of 5) when it comes to the heritage management of the Rideau Canal. It's part of their core mandate that they've been completely ignoring since 2012 (and partially ignoring since 1995). Parks Canada's stated focus for the Rideau Canal is on revenue generation, not on following their legislated requirements, and certainly not on heritage.		

For more information see: www.SaveOurRideau.ca

Comments can be directed to Ken Watson at rideauken@gmail.com