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The Honourable Catherine McKenna  
Minister of the Environment and Climate Change  
House of Commons  
Ottawa, Ontario K1A 0A6

June 26, 2018

***Re: Let's Talk Parks Canada: Rideau Canal response from Parks Canada***

Dear Minister McKenna,

I received an entirely unsatisfactory response from Parks Canada on June 21, 2018 (see attached copy) in response to my letter to you, dated May 27, 2018. That letter from Parks Canada reflects poorly on the Minister since it implies that Parks Canada plans to ignore your clear directive for "an emphasis on commemorative integrity at national historic sites together with the need to dedicate additional resources to education and interpretive programs" on the Rideau Canal National Historic Site. The letter is also highly misleading; it doesn't reflect the actual state of commemorative integrity of the Rideau Canal.

The Rideau Canal is not currently in a state of commemorative integrity primarily due to weaknesses in heritage landscape protection and lack of public education – both are requirements of Parks Canada's own legislation and commemorative integrity policies. You've to look no further than Parks Canada's Rideau Canal website to see the problem. I've attached the only page on that website (printed on June 26, 2018) that deals with heritage, in this case a very brief bit about natural heritage, there is nothing on their website about the cultural heritage of the Rideau Canal, nothing that would serve the public education component of commemorative integrity.

The public education component of commemorative integrity is a requirement to inform the public of the reasons for the site's National Historic Site designation. UNESCO has similar public education requirements for its World Heritage Site designation. Both are notable by their complete absence on Parks Canada's Rideau Canal website. That's been the case since their new website went up in April, 2017, now well over a year ago. Their old website had information about both designations (NHS and WHS) and a modest bit of history, including that of each lockstation. All of that was abandoned with the new website. It's a clear illustration that Parks Canada managers either don't understand commemorative integrity or have chosen to ignore it. You should ask Parks Canada why a significant public presence such as their Rideau Canal website doesn't contain any cultural heritage information.

Director Cunningham states that Visitor Services addresses commemorative integrity which is only true to a small degree. Visitor services is not (and never has been) designed as an interpretation unit and does not have the required expertise to develop and deliver public

education programming that would meet the requirements of commemorative integrity. Parks Canada must properly resource the Rideau Canal to develop and deliver a robust public education program, one that fully meets their legislated requirements to protect and present the Rideau Canal, their own commemorative integrity policies and UNESCO's public education requirements. To do that requires Parks Canada to put the required heritage expertise into the Rideau Canal Office, it needs to follow your directive to dedicate additional resources to education and interpretive programs.

The letter from Parks Canada is scraping the bottom of the barrel when it uses the example of oTentiks and former lockmaster residences as something they are doing to foster commemorative integrity. oTentiks actually have a negative impact on commemorative integrity since their angular alpine chalet lines, designed for National Parks such as Banff, clash with the soft heritage landscape of a Rideau Canal lockstation. The integrity of the heritage character of those landscapes is part of the commemorative integrity of the site. oTentiks serve commemorative integrity the same way a parking lot does in facilitating land based visitation. The lockmaster houses, redone with modern interiors, don't provide much of a cultural heritage experience. Neither of course in any way serve the public education requirements of commemorative integrity.

In addressing my complaint over the fact that there is presently no Parks Canada senior management located on the Rideau Canal (and even when there was, it was only a single manager), Director Cunningham's letter makes the case that the merger of the two very large heritage waterway systems has increased the profile of the Rideau Canal within Parks Canada, citing infrastructure funding as an example. I respectfully disagree since the Rideau Canal got short-changed on infrastructure funding, not all the problems identified in the 2012 National Asset Review are being addressed. My belief is that we would have received more funding if we'd had a dedicated Rideau management team. In addition, there have been issues brought up by myself and others regarding the Cultural Resource Management (CRM) of the infrastructure work. Much of the work has been well done, but there have been several CRM issues.

Also, clearly my reading of your Let's Talk Parks Canada report differs from what was indicated in the letter from Director Cunningham, which references the priorities as "to sustain the ecological and economic value" with no reference to the cultural heritage value which is what commemorative integrity is all about. The absence of any indication that cultural heritage is a priority is the root of the present problem. Certainly on the Rideau Canal the focus in recent years has been on revenue generation with Parks Canada devoting significant resources in personnel and funding to that end. While I question the actual value of that (are we as Canadians actually getting value for these large expenditures of public dollars?), it is being done at the expense of cultural heritage. An example of that is the fact that the heritage planner in the Rideau Canal office answers to the head of business development and was at one point tasked with furnishing the Davis Lockmaster's house (with modern furnishings), taking her away from her actual job as a heritage planner. This is yet another clear indication of the low priority Parks Canada presently places on cultural heritage.

The fact is that Parks Canada is not managing the Rideau Canal as a heritage site, commemorative integrity is not a priority. You need look no further than their website to see a

highly visible example of that. Public education is very weak, UNESCO requirements are not being met and heritage landscape issues at sites such as Jones Falls are not being addressed by Parks Canada.

I could go on, but bottom line is that Parks Canada apparently has not heard the message from the Let's Talk Parks Canada consultations. I know from recent press reports than many environmental groups are also sceptical that Parks Canada will do anything substantive to address your directives. The cuts in 2012 devastated the ecological and cultural heritage voices that used to be part of Parks Canada's senior management structure. Until those voices are returned to both the senior management and field unit management levels we're going to continue to have significant problems in how Parks Canada manages sites such as the Rideau Canal National Historic Site.

I would like to hear from your office regarding what you are doing to ensure that Parks Canada actually makes the required changes, given that Parks Canada apparently has no plans to do that for the Rideau Canal. Since the Rideau Canal runs through the Minister's riding, it is a good litmus test to see whether or not Parks Canada will make commemorative integrity a priority, something that is clearly not happening today.

Yours truly,



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cc. Rt. Hon. Justin Trudeau, Prime Minister of Canada  
Daniel Watson, CEO, Parks Canada Agency  
Jewel Cunningham, Director, Ontario Waterways Field Unit, Parks Canada Agency  
Hunter McGill, Chair, Friends of the Rideau  
Save Our Rideau

## Parks Canada

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# Rideau Canal National Historic Site

## Discover

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Along its 202 km route from Ottawa to Kingston, the Rideau Canal passes through four distinct natural landscapes, each of which possesses its own particular scenic beauty:

1. The Ottawa Clay Plain between Ottawa and Merrickville is a flat, glacial till plain.
2. Between Merrickville and Rideau Ferry lies the Smiths Falls Limestone Plain, an area of shallow soil and exposed limestone.
3. The Frontenac Axis extension of the Canadian Shield creates a rugged landscape between Rideau Ferry and Kingston Mills, characterised by a wild and untamed appearance.
4. The final landscape is the Napanee Plain, another area of shallow soil and exposed limestone, lying to the south of Kingston Mills.

The Rideau Canal is actually two separate river systems:

1. The Rideau River originating in Big Rideau Lake and flowing north-easterly to Ottawa,
2. The Cataraqui River starting at Newboro Lake and flowing south-westerly to Kingston.

The lift from Kingston to Upper Rideau Lake (the highest point on the system) is 50 m (164 ft.) in 14 locks. The lift from Ottawa to Upper Rideau Lake is 83.2 m (273 ft.) in 31 locks. The watershed of the Rideau is much the larger of the two rivers, 4,000 square km, compared to the 910 square km drained by the Cataraqui.

To create a navigable waterway, the builders of the canal significantly altered the natural environment through which it passed. In particular, the construction of a number of dams and weirs to control water levels resulted in drowned lands along the length of the canal, providing ideal conditions for fish such as largemouth bass and creating extensive wetland areas which have become a rich environment for a wide variety of plants and animals. The canal's wetlands are home to 42 rare plant species and rare animals like the small-footed bat. The waterways are home to one of the most diverse fish communities in Canada.

The Rideau is still an operating canal. Boaters travelling between Kingston and Ottawa pass along the rivers and lakes of the waterway, their journey made possible by the 47 locks of the system. Control of water levels to ensure sufficient draft in the navigation channel is vital to safe boating and this is accomplished through a series of reservoir lakes where, in the springtime, water from the

winter snows is captured as a source of supply to the canal when necessary. Water management is a delicate balancing act to maintain adequate navigation levels while avoiding harm to the natural environment.

The Rideau Canal ecosystem, although generally healthy, is subject to a variety of ecological stresses resulting from its increased use for boating and fishing and from increased pressure for shoreline development. The long term cumulative impact is estimated to be significant as many of these impacts are expected to continue or increase over time. The Rideau Canal works in close contact with the municipalities of the area, with other government agencies, and with concerned citizens to protect the natural heritage of the waterway.

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