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March 27, 2021

via email

Mr. David Britton, Director of Ontario Waterways

Mr. Ron Hallman, CEO, Parks Canada

Mr. Jonathan Wilkinson, Minister of Environment & Climate Change

Dear Sirs:

Since 1972, the Frontenac Heritage Foundation has worked on a volunteer basis to protect the heritage of the Kingston region, and while our primary focus is on the built heritage, we support all efforts to protect our incredible natural heritage across the region. Both built heritage and natural heritage are exemplified by the UNESCO World Heritage Site designation on the Rideau Canal. The Canal, the oldest operating canal on the continent, is a National Historic Site, a World Heritage Site recognized by UNESCO and deserves a comprehensive management plan that meets the guidelines, criteria and funding model for a National Heritage and World Heritage site.

The Frontenac Heritage Foundation has reviewed the online draft management plan by Parks Canada for feedback from the community. The Foundation has also read the comprehensive review, critique/comments of the draft management plan by Ken Watson (See Save Our Rideau.ca) The Foundation agrees with Mr. Watson's recommendations that there is a need to produce a more detailed, clearer, implementable document that is worthy of a National Heritage and UNESCO site. Mr. Watson has a 25-year record of involvement on all levels of the Rideau Canal including past management plans and is a well-known expert on the history of the Canal.

The draft plan fails to undertake the mandate of Parks Canada which is to preserve and protect heritage landscapes and built heritage for the benefit and enjoyment of future generations. The plan fails to follow guidelines set by UNESCO for master plans, and is deficient on community consultation and details on the implementation of the plan. The plan is vague and does not contain any measurable objectives or a vision to address the historic nature of the Canal.

In his review Mr. Watson identified the following deficiencies, and the Foundation acknowledges these, and notes a comprehensive management model should address these requirements.

- 1) The priorities in the Plan are not properly balanced: the draft plan is tourism based and trends based, not based on the core overall mandate of Parks Canada to preserve and protect.
- 2) The Foundation sees a lack of recognition for the commemorative integrity of the resource: the document does not adhere to the Parks Canada mandate.
- 3) Public Clarity and Accountability is missing: The plan is vague and lacks any measurable targets which are critical if local municipalities are to use the Plan to evaluate development applications along the length of the Canal.
- 4) Presenting Cultural Heritage: there are no objectives or targets established.

- 5) Presenting Natural Heritage: there are no objectives or targets established.
- 6) In terms of protecting Built Heritage, we see that engineering works are provided for, but not provisions for all historic structures.
- 7) The matter of protecting Heritage Landscapes is not adequately addressed: there are no detailed evaluations of the canal areas, but rather just protection of the lock stations. This is not acceptable in terms of long term protection of these cultural heritage landscapes.
- 8) Protecting Ecological Integrity is insufficient, as it is missing clear objectives with measurable targets specific to maintaining the ecological integrity of the Rideau Canal. With growing concerns about impacts resulting from climate change, this is a significant oversight.
- 9) The Plan does not meet UNESCO World Heritage Site requirements, as outlined in Appendix A of K. Watson letter, part of which follows:

*“Appendix A UNESCO Management Plan Guidelines - The principal objective of the management planning process is the strategic long-term protection of cultural heritage sites. A fundamental part of this is developing a framework for decision-making and for managing change at a particular cultural heritage property. When this framework is documented, along with the management goals, objectives and actions that are determined by the collective effort of those involved in managing the cultural heritage property, it is referred to as a ‘management plan’. Essentially, a management plan is the guidance document developed within, and describing, a particular management system. It is an important tool for all phases of the management cycle (planning, implementation, monitoring) of a cultural heritage property and needs to be periodically reviewed and renewed.”*

- 10) The Plan should acknowledge the need for adequate funding to meet its future needs.
- 11) Public engagement on this matter has been lacking. Even with Co-vid, more effort should have been made to circulate this important document to the broader public.

The Frontenac Heritage Foundation therefore agrees with the recommendations set forth in the letter written by Ken Watson. The draft management plan needs a significant re-write and there is a need for forward-looking, comprehensive, implementable Plan, one that meets local, national and UNESCO requirements. Thank you for your attention to this important document.

Sincerely,



Shirley Bailey, President  
Frontenac Heritage Foundation

cc. Mark Gerretsen, MPP, Kingston & the Islands  
Mayor Bryan Paterson and Members of Kingston Council