

**Submission to Parks Canada  
Regarding the  
Rideau Canal Draft Management Plan**

**by**

**Ken W. Watson**

**March 31, 2021**



## About the author

I have a background in geology and moved to the shores of the Rideau Canal in 1995. At that time I was looking to work from my house and building websites seemed to be the way to do that. In 1996 I started my Rideau website, [www.rideau-info.com](http://www.rideau-info.com), as a personal hobby (still is). It soon became the largest source of Rideau information (contemporary and historical) on the Internet and remains that way today. I also did various commercial websites from 1997 to my retirement in 2015.

I have been active with my local lake association since 1996, first as President and then, for the last 20 years, as Lake Steward and newsletter editor.

I'm a heritage researcher; I've authored four heritage books about the Rideau Canal, edited another and I have done hundreds of newsletter articles. I can quite factually state that I know more about the history of the Rideau Canal, particularly the period 1783 to 1832, than anyone living today. I also make all that information freely available on the Internet.

I deal with contemporary enjoyment of the Rideau, in addition to the large amount of information regarding present day enjoyment of the canal on my Rideau website, my Guide to the Rideau Canal has been freely available since 1998 and my free Paddling Guide to the Rideau Canal has been providing paddlers with detailed route and historical information since 2012. My website has sections dealing with fishing, hiking, cycling, driving, skating, and sightseeing in addition to boating.

I'm a photographer (advanced hobby) and share my photos in my publications and on the Internet.

I volunteer with several heritage organizations including as a board member of Friends of the Rideau since 1997 and a board member of the Delta Mill Society since 2001 (presently VP of the DMS). As a website builder I've volunteered my time over the year to build websites for the Kingston Historical Society, the Merrickville and District Historical Society, the Chaffey's Lock and Area Historical Society, The Rideau Heritage Network, the Perth & District Historical Society, the Delta Mill Society, the Rideau Roundtable and Friends of the Rideau. I continue with the latter four to this day.

With Parks Canada, I sat on the Rideau Canal Advisory Committee from 1997 to when it was terminated in 2011. I worked collaboratively with people in Parks Canada from 1997 to 2008 on my own heritage projects (all put into the public domain) and also on Friends of the Rideau projects, including brochures for use by Parks Canada such as "How A Lock Works" and "Be Rideau Loon Aware". I also volunteered my time and heritage skills to help Parks Canada with lockstation heritage information signage (2001) and with the nomination of the Rideau Canal as a UNESCO World Heritage Site. That volunteer work with Parks Canada lasted until 2008 when Parks Canada started to shut the door on that type of collaborative activity.

In 2012, after the massive re-organization changes and the total loss of heritage, I started up a new website, Save Our Rideau ([www.SaveOurRideau.ca](http://www.SaveOurRideau.ca)) – which I will continue until Parks Canada returns to serving their legislated heritage mandate on the Rideau Canal NHS and WHS.

I am first and foremost an advocate for the Rideau Canal. I have no vested interests in the Rideau Canal – I do this since I'm passionate about the Rideau, its contemporary use and fascinating history – my only goal is to share the wonders of the Rideau with the public at large, exactly what Parks Canada should be doing, but isn't.

## About this Document

This review is based on my 25 years of being involved with the Rideau Canal and of Parks Canada's management of the Rideau Canal. Based on that experience alone, I do speak with some authority on all these issues.

I also have had, and continue to have, the opportunity to do volunteer work with many different Rideau heritage and environmental groups which has provided me with a broad range of views of the Rideau Canal. In addition, in my Rideau commercial work, prior to retirement in 2015, I interacted directly with many businesses, including marinas, lodges, B&Bs, and realty firms. I even did a municipal website for 15 years. That work helped to provide me with a direct understanding of their Rideau wants and needs.

Versions of this document have been widely shared with individuals and organizations related to heritage and environment on the Rideau Canal. Their feedback is incorporated into this document. I've yet to have anyone disagree with what I'm saying in this review.

Of note, I am not asking Parks Canada to do anything outside of its legislated responsibilities. That is the core of the problem, Parks Canada is not following its legislated requirements on the Rideau Canal. That is, in essence, what my submission is all about, to have Parks Canada follow all of their legal requirements on the Rideau Canal. In support, in Section 1, I have listed various legislated requirements, ministerial directives and Parks Canada's own guidelines and policies that apply to the Rideau Canal as a National Historic Site of Canada and as a UNESCO World Heritage Site.

In addition, for those of us highly engaged with the Rideau Canal, there truly is a shared vision regarding what we wish to see for the Rideau Canal as we move further into the 21<sup>st</sup> century. This document presents much of that vision.

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## Executive Summary

In 2012, Parks Canada rolled the Rideau Canal back 50 years, to when the Department of Transport was running the canal, with a management framework re-structuring and a shift in priorities that put tourism and revenue generation (for Parks Canada) as its main, and in many cases, sole priorities. It was a decision to operate the Rideau Canal as a simple recreational waterway rather than as a heritage site. This large change in the management and policy direction on the canal was done with no public consultation. Significant sections of its existing (2005) management plan were abandoned. Parks Canada has effectively been operating the Rideau Canal without a management plan for the last 9 years.

This shift in priorities from operating the Rideau Canal as a heritage site (cultural and natural) is fully reflected in the draft management plan which is significantly imbalanced when it comes to legislated priorities. Parks Canada also made the decision in 2012 not to resource the Rideau (human, financial, intellectual) to even have the capacity to meet its heritage and ecological legislated requirements. That remains the case today and it is reflected in the draft management plan.

A brief listing of the issues, which are detailed in this document includes:

- 1) Parks Canada is not operating the Rideau Canal as a heritage site. It is not meeting its own legislated requirements (requirements of the Parks Canada Agency Act), it is not following recent Ministerial Directives with regards to commemorative and ecological integrity and it is not meeting UNESCO World Heritage Site requirements. This imbalance of priorities and not following its legal legislated requirements on the Rideau Canal are the main foundational issues.
- 2) The new “high level” format is not actually a management plan. It doesn’t meet the basic requirements of a management plan and it does not meet any of the international standards for a heritage site management plan, including UNESCO’s guidelines for what is required in a management plan for a World Heritage Site.
- 3) The plan does not provide for public clarity and accountability of how Parks Canada will manage the Rideau Canal. These are requirements of any Parks Canada management plan.
- 4) Current site management and the draft plan make no commitments to doing public engagement, a key component of operating a complex site such as Rideau Canal which has thousands of residents along its shores, many of whom are involved in serving Parks Canada’s mandate (individuals such as myself and NGOs such as Friends of the Rideau, local heritage organizations and lake associations). Engagement with local citizenry on matters related to the management of the site is also a UNESCO requirement. This was one of the significant casualties of the 2012 re-organization, Section 12.0 of the existing 2005 management plan was abandoned.
- 5) The management structure is not addressed (a requirement of any management plan). It would show a single senior manager (Director) located in Peterborough (Trent-Severn Waterway). The Rideau Canal is, quite literally, under remote part-time management. This has, and continues to have, severe negative impacts on the Rideau Canal. The learning curve for any manager is very long (my estimate is 3 years before they become good at their job in managing the complexities of the Rideau Canal, no matter what their background experience). We had one senior manager located on the Rideau (an Associate Director in the Smiths Falls office) for less than 2 years, he left in early 2018. That is now over 3 years ago and there has yet to be permanent staffing of that

position. The present management structure also has the planner answering to the head of the business development unit, a clear conflict of heritage interest and a power imbalance when it comes to heritage versus revenue generation.

- 6) Parks Canada has not resourced the Rideau Canal to even have the capacity to meet its heritage obligations. Resourcing in this regard is characterized by UNESCO as human, financial and intellectual. Parks Canada's heritage management of the Rideau Canal falls short on all three. It has no heritage unit, it has no heritage interpretation staff, it has no interpretive programs and it has no public education programs. Parks Canada has not provided the resourcing to meet these requirements; national as a National Historic Site of Canada and international as a UNESCO World Heritage Site. These are fundamental legal requirements for Parks Canada and they must be core funded to a level that will meet all of its national and international requirements.

The crux of the many problems with the current management of the Rideau Canal is that it doesn't fit into the models used by Parks Canada for site management. It has cultural and natural heritage elements, both of which must be addressed by Parks Canada. The Rideau Canal is one of Canada's most significant cultural heritage sites, but it's also a major waterway (less than 10% is what people would think of as a "canal", the rest are rivers and lakes), with all the environmental issues that come with that. It received its National Historic Site of Canada designation in 1925. In 1972 it was handed over from the Department of Transport to Parks Canada with a government directive for "*a shift in emphasis in the management of the canal systems from "transportation" to historic restoration, preservation and interpretation; natural environment preservation and interpretation and the optimum use of federal lands.*" In 2000, the waterway, from Kingston to Ottawa, was designated a Canadian Heritage River. In 2007 it was inscribed as a UNESCO World Heritage Site. These all show the incredible significance of the Rideau Canal to Canada. Yet Parks Canada is not managing and resourcing the canal to meet the requirements of those designations, in fact it is perpetuating the myth that the Rideau Canal is simply a recreational waterway.

Parks Canada did try to manage the Rideau Canal as a heritage site with environmental overlays up until 2008 when they made a policy shift to start operating the canal as just a recreational waterway, part of its new Visitor Experience program. They formalized this significant management shift with the management restructuring into Waterway in 2012.

Bottom line is that the Rideau Canal is supposed be managed as a cultural and natural heritage site. Canada, through its national designations of the Rideau Canal (NHS & CHR) and international designation as a World Heritage Site, has a commitment to fully resource the Rideau Canal to meet all the requirements of those designations. But heritage canals have never been a priority within Parks Canada and this is reflected today with Parks Canada's refusal to supply the Rideau with the resources required to run the canal as a heritage site and to fully meet its cultural heritage and ecological integrity requirements, much less its international obligations as a World Heritage Site.

Parks Canada is now compounding the simplified view of the Rideau Canal as only a recreational waterway. Its mandate and legislation clearly state that it must be presenting the heritage values of the Canal, to make people aware of the cultural and natural values of the canal, to have people understand the canal as much more than just a recreational waterway. That public awareness is also a UNESCO WHS requirement. It's not being done on the Rideau Canal.

## Parks Canada Management Plans

My comments regarding some of the main overarching issues (Section 1) and the detailed review of the plan (Section 2) are based on the current format of the plan, which is fundamentally flawed. I am aware that the Director of Ontario Waterways, who is ultimately responsible for the initial creation and the implementation of this plan, has no control over the format. But there are serious and substantive problems with what Parks Canada is today calling a management plan.

- The format of the plan is not the definition of a management plan by anyone outside the Parks Canada Agency. It is a highly stripped down format (see chronology below for how that developed), designed not for management guidance and accountability, but as a simplified version designed to meet a legislated requirement to create a plan, as easily as possible.
- It does not meet international guidelines for protected heritage area management plans, including UNESCO guidelines for a World Heritage Site Management Plan (see: <https://whc.unesco.org/en/managing-cultural-world-heritage/>)
- In whatever format, there is the extremely serious issue in that Parks Canada does not actually follow its management plans, at least not on the Rideau Canal. We have a very well documented example of this, the 2012 dramatic change in management structure and policy direction which resulted in the abandonment of significant portions of the 2005 NHS plan with no accountability (internal or external). There are similar issues with the WHS (2005) plan.
- The draft plan has many other substantive issues, including a complete lack of public clarity and accountability (see Purpose of a Management Plan below)

Please note that Mr. Manuel Stevens, a retired Parks Canada planner for the Rideau Canal, has provided a review of this “management plan” format to Parks Canada, based on his expertise and a thorough review of international protected area management plans. He has pointed out in detail the many deficiencies of this new plan format and how it fails to meet even minimum guidelines for a protected heritage area management plan. I fully support Mr. Stevens in all he has stated in that regard.

## Chronology of Rideau Canal Management Plans

**1996** – First management plan for the Rideau Canal released. Very inclusive, included broad public consultation. Very detailed.

**2005** – Second management plan released. Much improved over the 1996 version with well defined goals and actionable items and presented with clear wording in an easy to understand format. The Rideau Canal Advisory Committee was used for extensive early public consultation, plus the normal wide round of consultations on the draft document. This plan format and level of detail stands the test of time today as a very well written Parks Canada management plan.

**2008** – Parks Canada makes an internal decision to strip down its management plans and releases a new Guide to Management Planning (100 pages in length). Accountability is now restricted to internal Parks Canada (field unit to CEO and CEO to Minister). Public participation in the creation of the plan is characterized as a “legal obligation.”

**2008** – The Visitor Experience Opportunity Concept, a tourism program developed by Parks Canada, is rolled out on the Rideau Canal. The change in the management plan format in 2008 is no coincidence, it is very much in line with the concepts of the VEOC, a simplified tourism view of running a complex heritage site, including downgrading cultural and natural heritage interpretation and placing “visitor experience” as the top, and in many cases the only, priority.

**2010** – work starts on a new Rideau Canal management plan as per then legislated 5-year cycle. But that work was stopped due to an internal decision to change the management structure of Parks Canada’s heritage canals.

**2012** – Parks Canada’s historic canals are merged into a new Waterways Unit. Complete change in management structure and a formalization of the 2008 policy change to put tourism and revenue generation (for Parks Canada) as the new management direction for the heritage canals. No new management plan was done even though the management change resulted in the abandonment of significant sections of the 2005 plan. No public consultation regarding this significant change in management was ever done. Parks Canada at about that time wrote a new vision statement for the Rideau Canal (see Section 12.0 of this review), abandoning the shared vision for the canal shown in the 2005 plan.

**2012** – The Parks Canada Agency Act was changed to extend the management plan review cycle from 5 years to 10 years. This change sets a 2015 date for a new Rideau Canal Management plan according to the legal letter of the Act.

**2013** – Parks Canada issues a “Directive on Management Planning and Reporting” (21 pages) which further strips down the 2008 Guide to Management Planning document, making plans fully into simplified “high level” documents.

**2014** – Parks Canada issues a new “Guidelines for Management Planning and Reporting” (33 pages) which formalizes the severely stripped down management plan format.

**2015** – The ten year legislated management plan renewal date for the Rideau Canal comes and goes with no action taken by Parks Canada.

**2016** – Parks Canada starts the management plan process for the Rideau Canal with a series of open houses. That reveals a number of issues. Parks states that main consultations are to start in 2017.

**2017** – Management plan consultations delayed due to Canada 150.

**2018** – Focus group consultations held on the scoping document in January 2018. Main public consultations are now scheduled to be held in the fall of 2018. In the fall 2018, Parks stated that consultations would now take place in 2019.

**2019** – No word from Parks regarding the new plan. Public consultations are re-scheduled for spring/summer 2020 (no reasons given for the delay).

**2020** – COVID delays management plan consultations. In early December, various public groups receive a letter, with a copy of the partial (section 7.0 missing) draft plan (copy dated February 2020), stating “Parks Canada will officially launch Let’s Talk Rideau Canal! in January 2021.”

**2021** – January 26 – Parks Canada officially starts consultations (their rideauplan site goes live).

## Purpose of a Management Plan

A basic definition of a management plan is a document that defines and assesses the organization's goals and contains a realistic, detailed plan of action for meeting those goals.

In terms of goals, it starts with the mandate of the Parks Canada Agency:

*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 their ecological and commemorative integrity for present and future generations*

At its core, any Parks Canada management plan must clearly show how it plans to meet its mandate on any given site. The Parks Canada mandate shows that its priority must be to ecological and commemorative integrity. Those two items should be main focus of any management plan. In addition, as pointed out in UNESCO's management planning guidelines, any management plan must address the legal framework under which site is being managed, the institutional framework of the organization (Parks Canada) managing the site and the resources; human, financial and intellectual that create the operational capability to meet the goals of the management plan.

The following is a list of some of the items a Parks Canada management plan should address:

- a) Clearly show how Parks Canada will meet the all the requirements of a management plan under the Parks Canada Agency Act which is to ensure the commemorative integrity\* of a national historic site, to guide appropriate public use, to ensure the application of cultural resource management principles and practices in decision making, to present the natural and cultural heritage of the canal, and to conserve the natural values and maintain the ecological integrity of the Rideau Canal. \*Commemorative integrity is the integrity of the site's built heritage, the protection and authenticity of its heritage landscapes, and public education requirements for the reasons it was designated a National Historic Site.
- b) Just an emphasis on the above, the plan must clearly show how commemorative and ecological integrity are the first priority in decision making, that commemorative and ecological integrity are pre-requisites to visitor use of the site.
- c) Since this is a combined NHS and WHS management plan, it must also include all of UNESCO's management plan requirements, including detailing the Canadian legal framework of the Rideau Canal (detail the complex jurisdictional issues), the Parks Canada management framework for the Rideau Canal, and the resourcing (human, financial and intellectual) required to meet all WHS requirements.
- d) Provide public clarity on how the Rideau Canal is being managed by Parks Canada on behalf of all Canadians. The plan must allow an average citizen to gain a good understanding of how Parks Canada is managing the canal and how it is following all of its legislated requirements.
- e) Provide clarity on how the site management will engage with public stakeholders and local citizenry. Both UNESCO and Parks Canada have clear statements that the management of a complex site such as the Rideau Canal requires the engagement of local citizenry. This must be clearly shown as a commitment in the management plan.

- f) Provide a clearly defined policy framework for decision making, or management objectives, to guide managers and other interested parties on how the Canal should be managed today and in the future. That decision making process must be clearly detailed.
- g) Must show full accountability (internal and external) for Parks Canada's management of the Rideau Canal.
- h) Must clearly show Parks Canada's interests in adjacent land use and development matters and show the policies and management objectives that will guide Parks Canada's involvement therein (i.e. UNESCO visual values identification and protection).

### **Management Plan Format Conclusions:**

- **Parks Canada does not follow its management plans:** The most significant problem is that Parks Canada has no workable systems that ensure that a management plan is actually followed. Internal accountability is ineffective and there is no external accountability. We have an exact example of this problem on the Rideau Canal with the abandonment of significant sections of the 2005 plan in 2012. This is an issue no matter the format of the plan. In 2012, significant sections of the 2005 plan were simply dropped and much was not done (and most of those incomplete items have not shown up in the new plan). Parks Canada has effectively been operating the Rideau Canal without a management plan for the last 9 years with no accountability.
- **It is not a Management Plan:** The simplified “high level” plan is not actually a management plan by anyone’s definition outside of Parks Canada. It fails to meet even the basic requirements of a management plan for a significant heritage site.
- **Complexities of the Rideau Canal:** The restrictive format and the Parks Canada requirement for brevity, actually specifying length restrictions, such as only to 2 to 5 pages for all the Key Strategies and objectives, cannot capture the complexities of Rideau Canal. In the draft plan, there are only 11 pages (+ 2 simplified maps) to capture the management complexities of the Rideau Canal. The draft plan does not have the required level of detail.
- **Does not meet the Purpose of a Parks Canada Management Plan:** Most of the purposes of a management plan, listed above (Purpose of a Management Plan) are not included in the present draft plan.
- **Does not meet the requirements of a UNESCO WHS Management Plan:** The original Rideau Canal WHS plan (2005) is obsolete and Parks Canada has stated that this draft plan will be the only management plan for the Rideau, covering both NHS and WHS requirements. UNESCO WHS issues are presently entirely absent from this plan and the plan format does not meet UNESCO guidelines.
- **Does not provide Public Clarity and Accountability:** The ambiguous language and the use of Parks Canada jargon with no examples or definitions, contribute to a lack of public clarity of the plan. The format of the plan, including the severe brevity, also contributes to lack of public clarity.

## SYNOPSIS of OVERALL RIDEAU CANAL MANAGEMENT ISSUES

This is a listing of some main issues, directly related to Parks Canada's management of the Rideau Canal NHS & WHS. These must be directly addressed in any new management plan for the Rideau Canal. They are not addressed in the draft management plan.

### Vision for the Rideau Canal

The vision by which Parks Canada's is presently operating the canal and presented in the draft management plan is **not a shared vision**, it is the Parks Canada vision, one solely focused on tourism and revenue generation. It reflects an old Parks Canada vision implemented with the 2012 restructuring into Waterways, which was done with no public consultation. A shared vision would a forward looking vision that would include strong statements about maintaining the authenticity of the Rideau Canal, about the presentation (public understanding) of the cultural heritage of the canal, about the protection of cultural landscapes and the visual setting of the canal, about the environmental health of Rideau waters, and about the protection of Rideau ecosystems. Those are all significant cultural heritage and environmental challenges for the Rideau Canal as we move further into the 21<sup>st</sup> century. Those are absent in the draft plan. It's to be noted that Parks Canada's own management plan guidelines clearly states that a vision, must present "in a balanced fashion all mandate elements: heritage protection, public appreciation and understanding and visitor experience." See Section 12 for details.

### Imbalance of Priorities

The Rideau Canal is a large and complex system. At its fundamental level it is an operating canal during the summer and a managed water system (levels, flood mitigation and power generation) all year-round. It is also a significant recreational waterway and a significant economic contributor for the communities in the Rideau Corridor. This is how it was managed by the Department of Transport. It was handed over to Parks Canada in 1972 with a directive for "***a shift in emphasis in the management of the canal systems from "transportation" to historic restoration, preservation and interpretation; natural environment preservation and interpretation and the optimum use of federal lands.***"

Since 2012 with the re-organization into a combined Waterways unit, which included a major change of management direction, Parks Canada went back to the old 1960s Department of Transport era (recreational waterway) with the added wrinkle of revenue generation (for Parks Canada) as a priority over heritage and ecology. Heritage and ecology are two of the three fundamental pillars of Parks Canada, with visitors (tourism) being the third. The Parks Canada Agency Act clearly states that commemorative and ecological integrity are prerequisites to visitor use of the site. This has not been the case on the Rideau Canal since 2012. A balance between tourism, cultural heritage protection and presentation, and ecological integrity, with commemorative and ecological integrity clearly shown as priorities, are not in the plan. See Section 1 for details.

### Commemorative Integrity

The Rideau Canal is currently **not in a state of commemorative integrity** due to many problems with the erosion of the built heritage fabric, problems with cultural landscapes, and the lack of pubic education regarding the designation of the site. These are also requirements of the Rideau Canal as a World

Heritage Site, to protect and present the Outstanding Universal Value (OUV) of the site. In 2019 UNESCO rebuked the Government of Canada for failing to protect the OUV of the Rideau Canal World Heritage Site, specifically stating that the management system of the site did not adequately protect those values. Commemorative integrity must be shown as a clear priority on the Rideau Canal. This is not shown in the current plan. See section 2.0 for details

### **Ecological Integrity**

The Rideau Canal is currently **not in a state of ecological integrity**. The Rideau Canal contains a variety of ecosystems, all now under significant threats from many sources including inappropriate development, inappropriate visitor use, invasive species, habitat loss and climate change. The setting of the Rideau Canal, with thousands of residents along its shorelines means that the public plays a huge role in the ecological health of the waterway. The lack of public engagement with public groups such as lake associations, and the highly complex jurisdictional issues and Parks Canada's general "not our jurisdiction" as an excuse for inaction, are significant contributors to the erosion of ecological integrity. The lack of public awareness about the many environmental issues, a role where Parks Canada should be providing leadership, is also a significant contributor to the loss of ecological integrity. Ecological integrity is not addressed in the current plan.

A significant issue is that Parks Canada has stated that its legislated obligations to ecological integrity do not apply to the Rideau Canal. The Rideau Canal is a federally owned waterway under the management of Parks Canada. Parks Canada has a clear obligation to maintain the ecological integrity of the natural regions under its control. The waters and wetlands of the Rideau Canal are significant natural regions containing a variety of ecosystems, now under threat due to ever increasing development and climate change. Parks Canada clearly has a direct responsibility to the ecological integrity of the Rideau Canal. See section 8.0 for details.

### **Public Engagement**

Parks Canada **does not do public engagement** on the Rideau Canal. Public engagement means the direct engagement by senior managers (policy issues) and also directly with the staff responsible for heritage and environmental issues, with key public stakeholders such as myself and NGOs such as Friends of the Rideau, the Rideau Roundtable, local heritage organizations and lake associations. It means relationship building and meaningful co-operation with the engaged public. A formal engagement mechanism to do part of this, the Rideau Canal Advisory Committee (a committee of the Superintendent), was terminated by Parks Canada in 2011 and has never been reformed. Working cooperatively with local citizens is critical as the Rideau Canal faces the many challenges, including threats to its cultural heritage and ecological integrity, of the 21<sup>st</sup> century. There is no commitment to public engagement in the current plan. It's to be noted that meaningful engagement with local citizens is both a Parks Canada policy requirement and a UNESCO guideline. See section 11 for details.

### **Resourcing**

Parks Canada has **not resourced the Rideau Canal** to meet its legislated obligations under the Parks Canada Agency Act and its international obligations as UNESCO World Heritage Site. UNESCO categorizes this resourcing as human, financial and intellectual. This failing is two-fold, one is the lack of human, financial and intellectual resources to be able to meet its heritage obligations to site knowledge and presentation, and the other is the lack of sustainable capital funding to maintain its heritage assets, both

built heritage and cultural landscapes. The most significant issue with human resourcing is the lack of qualified heritage staff to meet its National Historic Site and World Heritage Site requirements to public education (interpretation) and the proper maintenance of the heritage fabric of the site. At present the only heritage staff is a single planner (for both the Rideau and the Trent-Severn) and no staff at all with historical/heritage expertise and public education skills. There is no heritage manager, no heritage unit, no heritage team. The management plan is silent on human resourcing other than to say, in the heritage protection and presentation section, that “resources are limited” (the only resource limitation mentioned in the entire plan).

Sustainable capital funding is required to maintain all of its heritage assets in at least fair to good condition. Parks Canada has not supplied such funding for the Rideau Canal and the infrastructure program has only dealt with some of the worst issues. The plan has no commitment to heritage resourcing of any sort and with the built heritage fabric, shows that it intends to leave up to 30% of the engineering structures in very poor to poor condition and has no commitments to the rest of the built heritage fabric. See Section 10.0 for details.

### **Focus on Camping over Boating & Visitation**

A National Park priority to camping is being placed on the heritage canals including a focus on camping over boating and land based visitors. This is being done on a site that is already well served with many camping and accommodation facilities. Significant resources are going into this at a time when Parks Canada says it does not have the resources to meet its heritage mandates for the Rideau Canal. Boats going through locks are part of core heritage (when properly interpreted), since it's only when a boat goes through a lock that a visitor see a 19<sup>th</sup> century lock in operation. Operating locks are the largest land based tourism draw, visitors want to see a lock in operation which only happens when a boat is going through. Boaters making use of the locks should be a marketing priority on the Rideau Canal. Visitors coming to the locks to see them in operation should also be a marketing priority. Unfortunately they aren't. We see a focus on camping in social media and marketing of accommodations such as oTENTiks, or converted lockmaster houses, not on boaters who will make use of the locks or visitors to the locks. This problem is reflected in the current draft plan.

It is having a negative heritage impact, both in the how camping is being developed on the site and the large amount of resources being put into camping and accommodations at a time when Parks Canada says it doesn't have the resources to do heritage.

It is understood that getting Canadians camping is a priority of the Government of Canada, and therefore a priority of Parks Canada, and I have no issues with that. It is how it is being inappropriately applied to the Rideau Canal NHS/WHS. Our heritage canals should not be a focus for a national camping initiative, particularly at a time when Parks Canada says it does not have the resources to properly deliver its natural and cultural heritage mandates on the Rideau Canal. Limited resources for the Rideau must be first applied to Parks Canada's primary mandates. See Section 1 and detailed review section.

### **Active Transportation**

Parks Canada started an initiative back in 2012 to make the Rideau paddling friendly through the use of purpose paddling friendly dockage and defined portages at lockstations. That was initiated by Don MacKay (Parks Canada, now retired), an active paddler. Since then the only initiative has been half price on a season pass for a paddler (making it about the same price as regular transit pass). The management

plan does show a new paddling initiative, but there is no one in Waterways that I am aware of that knows how to do properly do this and the objectives and targets are very vague. Parks Canada does not work with the Rideau paddling community or work with existing paddling resources. As a paddler and the author of the most comprehensive paddling guide to the Rideau Canal (provided for free to the public), this is a very serious concern. There are also several barriers to transit paddling on the Rideau Canal that should be addressed by Parks Canada and there are no commitments to that in the draft plan. See the detailed review section.

### **Rideau Canal Awareness**

With the merger into Waterways in 2012 and the loss of the central Rideau tourism organization (Rideau Heritage Route Tourism organization), the Rideau Canal is not being well promoted. A visible example of that is the lack of signage on either the 401 or 416 directing people to the Rideau Canal. Other sites (i.e. Fort Wellington) have prominent signage. Quebec canals have huge overhead signs on major highways. But the Rideau Canal has no signage from major road access points. The steady decline in boaters using locks on the Rideau Canal since 2007, is also due, in part, to the shift in marketing focus away from boaters. For the Rideau Canal to remain relevant we need both on-water and land based visitors. Site awareness and marketing of the Rideau Canal are two major tools that should be used to do this.

Parks Canada used to have its own Rideau Canal marketing unit. That was eliminated when the Rideau Heritage Route Tourism Association was formed in 2005. Parks Canada then provided some funding to the RHRRA, up until 2012, and then stopped that funding. The Rideau Heritage Route Tourism Association fell apart in 2015 and it has left a large gap in the middle in the Rideau Corridor (the takeover of the RHRRA by Leeds & Grenville Economic Development has not replaced an active tourism organization for the Rideau Corridor). Parks Canada should take leadership by reinvigorating the process and to replace what has been lost. Of note, Provincial regional tourism organizations split the Rideau Corridor into three zones and have not been effective in marketing the Rideau Canal.

Parks Canada, by directly marketing, also has the opportunity to target the type of visitor it wants to see on the Rideau Canal, visitors that will appreciate the natural and cultural values of the canal.

### **Public Accountability**

Parks Canada is supposed to be managing the Rideau Canal on behalf of all Canadians. As such, how it manages the canal must include accountability, both internal (to the Government of Canada) and external (public). On the Rideau Canal, we saw significant sections of an existing management plan (the 2005 plan) abandoned in 2012 with no accountability. Parks Canada has a legislated requirement to create management plans, but clearly, as we've seen directly on the Rideau Canal, no requirements to actually follow them. Up to now on the Rideau we've had no public accountability regarding the existing (2005) plan even though that plan did specify public accountability. For instance it is stated in that plan that Parks Canada will "*Prepare an annual assessment of the progress of implementing the plan and inform the public.*" This has not been done. There are no public accountability systems in place in their management system for the canal. The new draft plan doesn't provide any details regarding public accountability. Parks Canada public accountability methods must be clearly defined in the plan and then actually followed. Public accountability is absent from this plan.

### **External Accountability:**

Part of the accountability problem is how Parks Canada is set up as an Agency with no external oversight. We've seen this problem directly on the Rideau Canal. Parks Canada picks and chooses which of its own legislated requirements (PCA Act) it wishes to follow on any given NHS site. For instance, within Ontario Waterways, it has 8 people in an environmental services section, even though Ecological Integrity, which is a PCA Act requirement, it isn't even a listed objective in this management plan. It has those people since Parks Canada is responsible for external legislation, such as those dealing with environmental impact assessments, species at risk, contaminated sites management and management of invasive species. It has no choice with those. But, when it comes to Parks Canada's own legislation, Parks Canada, as an Agency, gets to choose which ones it decides to follow, a reason it has no interpretive heritage staff, even though, if it were to follow the PCA Act, it would have a Manager of Heritage and dedicated heritage staff on the Rideau Canal.

This problem was recently pointed out with another agency, the Public Health Agency of Canada (PHAC), and how it wasn't ready for COVID ("Federal documents show sharp decline of Canada's pandemic warning system, and debate over who was to blame", Globe & Mail, February 25, 2021). The PMO pointed out that PHAC, "as an Agency, gets to decide, to an extent, their own priorities - those would be internal, bureaucratic decisions ..." This appears to be exactly the problem with the Parks Canada Agency and the Rideau Canal. PCA chooses which of its legislated requirements it will follow on the Rideau Canal and which ones it will ignore. With no oversight, Parks Canada is simply accountable to itself and, on the Rideau Canal, it is not holding itself to account. This significant problem needs to be addressed by the Government of Canada, to have some serious oversight of Parks Canada, including external reviews of their actions with respect to following management plans.

### **Meaningful Consultations**

There is a lack of incorporating public input into this draft plan. In January 2018, roundtable sessions were held to provide public and other government agencies input into the scoping document for this plan. The many cultural heritage and environmental issues that were brought up during those very well done sessions are not in the draft plan. Parks Canada appears to have simply ignored that public input. The reasons for that have not been made clear, but a worry is that it may have to do with the significant upper level reviews of the plan, which includes the Executive Director of Ontario and Waterways; the Senior Vice President of Operations; and the President and Chief Executive Officer of Parks Canada, none of whom have been involved in the public consultation process. Were the results from the January 2018 consultations not incorporated into the draft plan to begin with, or were they stripped from the plan during senior management review of the draft plan?

An ask by myself and others is to see a Draft 2 of this draft plan before it is finalized. Outside of significant missing issues (i.e. UNESCO (all the WHS issues), heritage resourcing, jurisdictional clarity, public engagement, etc.), the new draft must reflect a shared vision and the many concerns brought up during these consultations. Substantive changes will have to be made to the plan to incorporate the present consultations. It will of course be an expectation that a Draft 2 will in fact reflect the present public input and that any draft version of the plan, last seen by the public, will be substantively what the Minister tables in Parliament.

It's to be noted that other Parks Canada sites, such as the Mountain Parks, are doing a 2 stage process. They produced a "What We Heard" from initial consultations so that the draft plans for each specific park can be measured against the "What We Heard." They specifically reference it as a 2 stage process, for instance: "Stage one of public engagement is now complete for Waterton Lakes National Park. These discussions helped to identify key visions and priorities to be considered in the park's draft management plan." On the Rideau, we got no such "What We Heard" from the January 2018 consultations and the results of those consultations are not in the draft plan.

A "What We Heard" will be produced from this consultation process, but, unless a Draft 2 is made available for public review, there is no assurance that these consultations will be any more meaningful than the January 2018 consultations. There is a significant concern that the production of a "What We Heard" document is simply a bureaucratic exercise. That it is just a perceptual exercise to show that Parks Canada does value and incorporate public input, when in fact it does not. There is a significant worry that Parks Canada is simply conducting a pro-forma process when it comes to a new management plan for the Rideau Canal.

We need, at minimum, what some other major Parks Canada sites have received, an opportunity to review a plan that incorporates public consultations. We need to be able to see, and comment on, the management plan that Parks Canada intends to submit to the Minister of Environment and Climate Change.

It is a public expectation and a need that the last version of the plan seen by the public will be substantively the plan that is signed by the Minister and tabled in Parliament.

### **Public Trust**

A key factor for any government department or agency that deals directly with the public is the public trust of the institution. That trust has to be built on open and honest relationships. We haven't had those on the Rideau Canal in quite some time. It also requires that those relationships be with the people who actually administer and control policy on the site. The engaged public understands limitations of government – what Parks Canada does on the Rideau Canal has to be legislation and policy based, but that doesn't preclude open and honest engagement, the key component of public trust.

We see the problem directly with draft management plan, a significant amount of obtuse and ambiguous wording that appears designed to create a false impression rather than an honest presentation of the management of the site. What the management plan says is happening on the Rideau Canal is not what the public on the canal sees in real life.

The plan should commit to a new era of engagement, to truly listen to public stakeholders, those that are working on the Rideau Canal to directly serve Parks Canada's mandate with regards to cultural heritage protection and presentation, ecological integrity and the environmental health of Rideau waters. Words from Parks Canada must lead to actions on the ground, trust is not built from words, it is built from tangible actions.

As it stands right now on the Rideau Canal, Parks Canada has lost the public trust.

## SECTION 1 – MAIN ISSUES

This section is a high level look at the plan, measuring the plan against Parks Canada's mandate and its direct legislated requirements including The Parks Canada Agency Act, the Species at Risk Act and other federal acts that are a responsibility of Parks Canada on the Rideau Canal. In addition there are Parks Canada's International obligations to UNESCO under the World Heritage Convention that must be addressed in any management plan developed for the site.

The main litmus test for any Parks Canada management plan is whether it meets the requirement to deliver its mandate to the site it is managing. The following is the Mandate of Parks Canada:

*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 their ecological and commemorative integrity for present and future generations*

Using that main measure, the draft management plan clearly **does not** meet Parks Canada's mandate. It does not address many of the requirements of this mandate. In addition, it's an expectation that any Parks Canada management plan would have this mandate front and center in the plan. It is not in the draft plan. Everything Parks Canada does on the Rideau Canal must serve to meet this mandate.

The Parks Canada Agency Act, Parks Canada internal policies (i.e. Cultural Resource Management policies), and resourcing requirements (qualified staff to meet that mandate on each site), all flow from this mandate. Any Parks Canada management plan must clearly deliver that mandate in its management of the Rideau Canal. Those management requirements must be presented in the plan in a manner that provides for public clarity and accountability of how Parks Canada will meet its mandate and manage the Rideau Canal on behalf of all Canadians.

The following is a list of the main issues:

- 1) Imbalance of Priorities**
- 2) Commemorative Integrity**
- 3) Public Clarity and Accountability**
- 4) Presenting Cultural Heritage**
- 5) Presenting Natural Heritage**
- 6) Protecting Built Heritage**
- 7) Protecting Heritage Landscapes**
- 8) Protecting Ecological Integrity**
- 9) Meeting UNESCO World Heritage Site requirements**
- 10) Resourcing capacity to meet NHS and WHS requirements**
- 11) Public Engagement in the management of the Rideau Canal**
- 12) Providing a Shared Vision**

## 1.0 Imbalance of Priorities

### 1.1 Legislative Requirements:

The Parks Canada Agency Act states that "it is in the national interest ... to ensure the commemorative integrity of national historic sites" and "to maintain ecological and commemorative integrity as a prerequisite to the use of national parks and national historic sites" and "to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity."

In 1972, the Rideau Canal and other historic canals changed hands from being run by the Department of Transport to Parks Canada with a directive for "*a shift in emphasis in the management of the canal systems from "transportation" to historic restoration, preservation and interpretation; natural environment preservation and interpretation and the optimum use of federal lands.*"

### 1.2 Ministerial Directives

In 2017, as a result of the Let's Talk Parks Canada consultations, the Minister issued a directive to Parks Canada for "*An emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs.*"

In addition, in December 2018, the Minister formed a working group stating "*Following the largest ever consultation on Parks Canada [2017 Let's Talk Parks Canada consultations], a working group of experts in many fields will help us implement one of the recommendation from Lets Talk Parks, Canada, making sure that ecological/commemorative integrity is at the forefront of our decisions.*"

### 1.3 Foundational Requirements

The primary value of the Rideau Canal is of an intact, continuously operating canal, one that dates back to a dynamic period in Canadian history. The designations it has received as both a National Historic Site of Canada and as a UNESCO World Heritage Site, speak to those core values of the canal. It is the most significant heritage canal in Canada. The historic designations speak to its authenticity, its engineering design, the military purpose for which it was built, its role in nation building, and its role in the cultural development of the Rideau corridor.

Parks Canada has both national and international obligations to protect these core values, including authenticity, and to present the canal, to foster public understanding of the values of the canal. Those are legislated priorities for Parks Canada's management of the Rideau Canal. Parks Canada is obligated, by its own legislation and international agreements, to make those values as priorities, including resourcing to support those priorities in its management of the Rideau Canal.

### 1.4 Synopsis

The Rideau Canal today is being run as simple recreational waterway with revenue generation as the main decision driver. Commemorative and ecological integrity are lower priorities in decision making. Cultural heritage is not resourced, outside of a single planner for both the Rideau and Trent-Severn there is no

heritage staff. There are no educational and interpretive programs related to either commemorative integrity or ecological integrity. There is no public engagement with the public who are working on Rideau Canal commemorative and ecological integrity. This imbalance of priorities is directly reflected in the current draft plan.

In 2008, Parks Canada made a fundamental shift in its management of the Rideau Canal, making tourism (“visitor experience program”) a priority over heritage and ecology. The visitor experience program was developed outside of their heritage and ecology interpretation programming and does not include any substantive interpretation or public education. At the same time, Parks Canada shifted public engagement, from direct engagement with policy makers and implementers, to done by communications staff, which effectively ended meaningful public engagement. A formal engagement mechanism, the Rideau Canal Advisory Committee, a public advisory committee of the Superintendent, was abandoned in 2008. It was briefly reinstated in 2010 by a new Superintendent, for 2 meetings, before being completely disbanded in 2011.

In 2012 a completely new management structure was imposed on the Rideau Canal, merging it with the Trent-Severn Waterway, creating an under managed situation by combining two Superintendents into a single Director (located in Peterborough). It also formalized the management structure into one that made tourism and revenue generation a priority over cultural heritage and ecological integrity. It was done with no public consultation and it formalized the loss of essentially all heritage resources from the Rideau Canal. It also formalized the abandonment of significant sections of the 2005 management plan.

The present draft management plan, as written, reflects this imbalanced management of the Rideau Canal, one that places cultural heritage and ecology as a much lower priorities to tourism and revenue generation. This is in direct contravention to the requirements of the Parks Canada Agency Act and the World Heritage Convention. The imbalance of priorities has been embedded into this plan. The plan does reflect how the Rideau Canal has been operated since 2012, including stripping all heritage resources from the management of the canal.

It is now 9 years after than change was done, with the public finally being able to provide input into what is essentially a 2012 management plan. A plan that is badly out of skew in terms of legislated priorities and resourcing. Parks Canada is not running, and clearly does not want to run, its heritage canals as heritage canals, including the most significant one it administers, the Rideau Canal. It does not apply all the requirements of the Parks Canada Agency Act to its heritage canals (i.e. cultural heritage and ecological integrity) and it does not sufficiently resource its heritage canals. Those are priority and budget choices made by Parks Canada HQ. It's not a new problem. The draft management plan has been written with those resourcing limitations in place.

The Rideau Canal also remains severely undermanaged. The situation for the last 3 years has had a single senior manager, the Director of Ontario Waterways, in Peterborough. That puts the Rideau Canal, quite literally under part-time management. Since 2013, we've only had 2 years with a senior manager in place in Smiths Falls, an Associate Director, a person with responsibilities for both the Rideau Canal and Trent-Severn Waterway. It has now been over 3 years since the Rideau Canal last had an Associate Director, we still have no permanent staffing of that position. The management plan is silent on this serious management issue.

These severe management problems directly impact on priorities, since the corporate culture of Ontario Waterways and resourcing decisions at the field level come from the Director. While the Director works within the constraints placed upon that position by senior managers in Parks Canada, it is up to the Director to ensure that all the requirements of the Parks Canada Agency Act are applied at the field level. The non-legislated requirement for revenue generation is clearly a major driving force today, field units are pressured to try to do everything they can to earn more revenue for themselves. This further skews the imbalance of priorities, including a concept that core requirements of Parks Canada, such as cultural heritage and ecological integrity, need to be funded through revenue generation. That's an extremely severe problem and it is directly reflected in the draft plan.

## **1.5 Detailed Evaluation**

### **Priorities to Commemorative and Ecological Integrity**

The plan does reflect how the Rideau Canal is being run today, with a severe imbalance of priorities. This is how Parks Canada structured and resourced Ontario Waterways. Much of the required re-balancing could be done with existing resources, but that would require a significant shift in management direction. Parks Canada has done this in the recent past, the very quick decision to merge the Rideau Canal NHS & WHS and the Trent-Severn Waterways NHS, into a single Ontario Waterways unit. It could just as easily go the other way, restoring independent NHS site management but maintaining synergies between waterways with common things such as engineering and water management. This would be a much more logical and efficient management structure for these large and complex sites (Rideau and Trent-Severn, each with their own specific needs and issues). The amount of constant re-jigging of the structure since 2012 shows that it was not well thought in the first place and the Rideau Canal has suffered, and continues to suffer, because of that. The severe challenges Parks Canada seems to face in staffing positions, the now over 3 year gap in getting an Associate Director into the Rideau Canal office for instance and the complete lack of creating and staffing heritage positions, means that required priorities to cultural heritage cannot be met.

Given that the plan is going to have to start with what is in place now, it needs to provide a clear vision and commitment to placing commemorative and ecological integrity as priorities. The plan must be changed to reflect a balance of priorities and resourcing evenly split between tourism, cultural heritage and ecological integrity. I've been told by the Director of Ontario Waterways that the Key Strategies don't reflect the order of priority. However the public, including myself, see the current priorities for Parks Canada shown in the order of the Key Strategy listings. But if that wasn't the intent, then Key Strategy #3 should be changed to Key Strategy #1, Key Strategy #2 can stay where it is and Key Strategy #1 should be dropped down to the bottom of the list.

Current Key Strategies #2 and #3 will need to include the many required additions and changes noted in this document. UNESCO WHS requirements should be listed out as a separate Key Strategy – Meeting UNESCO WHS Requirements on the Rideau Canal. In which case that would be Key Strategy #3, with Tourism shown as Key Strategy #4.

### Revenue Generation

The real thorny issue is revenue generation which is one of the most serious issues putting the priorities out of balance. It certainly doesn't belong as a priority in the plan and wherever it is shown, it also must be shown that it has to be done as a secondary consideration to ecological and commemorative integrity. That is a legislated requirement. It goes to the core of the argument of whether significant examples of Canadian heritage, such as the Rideau Canal, should be funded by the Canadian government or funded through revenue generation on the site. This is not the question of visitor use, and how much visitors should pay for their use of the canal, it is the question of funding the core maintenance of the commemorative integrity and ecological integrity of the Rideau Canal.

As noted, it is only under Key Strategy #2, the Protection and Presentation of the Canal, that we see a mention of a resource limitation. This is the last place where a resource limitation should be shown. Canadian cultural heritage protection and presentation should be funded by the Canadian government. For some reason they've chosen not to do so for the Rideau Canal. The Chair of Friends of the Rideau, Hunter McGill, noted in a recent consultation session on the management plan, that in other countries, such as France, this isn't even a question. They don't try to make their heritage pay for itself, the preservation and presentation of their national heritage receives core government support. That should be the same for us in Canada.

My personal observation is that the corporate culture of Waterways is completely focussed on revenue generation, it is a main driver in decision making, including priorities. Even during consultations with Friends of the Rideau on this plan, which was a high level discussion on topics such as the imbalance of priorities, the need for the protection and presentation of cultural landscapes, the need for public education, the need for public engagement, and the need to meet UNESCO WHS requirements, Parks Canada asked Friends for ideas about revenue generation. That shows how deep seated this concept is embedded in the current management of the canal, that Parks Canada must do revenue generation to support its heritage mandate on the Rideau Canal.

Revenue generation in and of itself is not a bad thing. The big ticket items in terms of revenue, things such as power generation and the leasing of commercial use of the canal, were being done long before the restructuring into Waterways and the introduction of business development unit. But the problem is compounded today by several issues.

One problem is issues arising from Government of Canada decisions such as price freezes on lockage fees. Those have never been a good idea. Those fees are now back to being inflation indexed, a type of gradual increase that has broad public support and which should have been the case from day one. The worry in this regard has been example from the past of the playing catch-up after a prolonged freeze since sudden price increases dramatically decrease the use of the locks. The present system of indexed increases should be maintained. Since the Government of Canada is responsible for this loss of revenue to Waterways (decisions to price freeze), they should make up for it with funding for that loss of revenue.

The most significant problem we see now is that a priority is placed on revenue generation over pretty much everything else, including cultural heritage. That includes the fact that the planner answers to the head of the Business Development Unit, which is a clear conflict of heritage interest. The planner duties include management planning, representing the waterways in regional planning initiatives, interfacing with municipalities and other jurisdictions on developments on neighbouring lands that could impact the

waterways. The planner also coordinates cultural resources management services for the field unit, presently supplied by Parks HQ (in itself an issue due to their unfamiliarity of the CRM details of the Rideau). The planner must be independent from business development. As structured, it is a power imbalance that automatically places business development ahead of heritage.

The first question asked by Parks Canada in any heritage initiative discussion is not “how will this initiative serve our mandate?” it is “how much will this cost us and can it generate revenue?” This is shown time and again in Parks Canada’s actions on the canal. In my volunteer work with Friends of the Rideau, this is a problem we constantly encounter, whether it be to try to get heritage interpretation material, such as our How A Lock Works brochures, addressed by Parks, to heritage initiatives such as the Rideau Passport, a Rideau Speakers’ Bureau, or an interpretive plan for the abandoned Smiths Falls Combined locks. All of those initiatives would help to serve Parks Canada’s core heritage mandate. They will also all cost Parks Canada money and so are stopped in their tracks since Parks Canada has not placed heritage as a priority and has no funding allocated for heritage interpretation. Rather it has a concept that heritage interpretation initiatives should be paid for through revenue generation.

Another issue are the false economies seen on the Rideau, due to a large part to National Park priorities being applied to the Rideau Canal, particularly those to encourage land based camping. Camping in and of itself is not a bad idea, the Rideau Canal has a very long history of camping, dating back thousands of years, from indigenous use of the canal right through to the present day. Paddlers and those in small power boats have always used the lockstations as camping spots, that on-demand availability (camping on the grounds of a lockstation without requiring an advance reservation) is a boon to those travelling the Rideau Canal. There are many external camping opportunities on the Rideau Canal including two provincial parks and many private campgrounds. Expensive initiatives such as oTENTiks and lockmaster house conversions do little to improve visitor numbers or even general camping on/near the Rideau Canal.

The significant problem is that these expensive undertakings and their use of Parks Canada resources are being done at the expense of cultural and natural heritage. We’ve seen those problems with the introduction of oTENTiks and the conversion of historic lockmaster houses into upscale rental offerings (modern interiors). These are very expensive for Parks Canada and resource intensive. We’ve seen examples of the resources Parks is willing to put into that, including Parks Canada going to the large expense and effort of setting up an oTENTik at the Toronto Boat Show. On their social media feeds in the last few years, camping opportunities are the #1 mention ahead of boating, land based visitation, heritage and ecology. At the same time, Parks Canada chooses not to resource the Rideau to meet its cultural heritage obligations, citing in the plan that “resources are finite.” But the real problem is the imbalance of existing resources, which goes to the imbalance in priorities.

The root of the problem goes back to the fact the Rideau Canal is being underfunded by Parks Canada and that revenue generated by a field unit, goes back to the field unit (started in the early 2000s – prior to that revenues went to the Canadian government in general, not back to Parks Canada). So field units, such as Ontario Waterways, are under intense pressure to do revenue generation and this is putting priorities badly out of skew. This is a problem embedded in the system, which goes beyond Waterways. It’s a major issue that skews Parks Canada’s priorities in general.

**Recommendations:**

- 1) Overall resourcing must place commemorative and ecological integrity, and international obligations (WHS), as core resourcing priorities. The draft plan shows that Parks Canada is placing a much higher priority on resourcing what should be lower priority items (based on priorities shown in Parks Canada's legislation), such as the conversion of 5 lockmaster houses, into rental accommodations. If resources are finite, as stated in the plan, then those existing resources should first be applied to Parks Canada's legislated requirements to cultural heritage, which would includes heritage staff and robust interpretive and public education programs.
- 2) This resourcing issue also applies to our international obligations, specifically to the World Heritage Convention which has the presentation (interpretation and public education) and transmission to future generations as key requirements, the same as Parks Canada's requirements under commemorative integrity to interpretation and public education. By putting cultural heritage as the lowest priority with Waterways, we are in contravention of our international obligations. In addition, the specific 2019 UNESCO requests are going to require significant new resourcing on the part of Parks Canada. This must be shown in the plan.
- 3) The plan must be re-written to show the concepts of Key Strategy #3, Managing a 19<sup>th</sup> Century Canal in the 21<sup>st</sup> Century as Key Strategy #1 (with the changes/addition shown in this document). Maintaining the authenticity of the canal, maintaining the environmental health of our waters, ensuring that the Rideau Canal is a sustainable site in terms of cultural and ecological integrity, should be the overriding priority of Parks Canada's management of the Rideau Canal.
- 4) Key Strategy #2, the Protection and Presentation of the Canal, with the changes and additions show in this document can remain as Key Strategy #2.
- 5) A New Key Strategy #3, Meeting UNESCO World Heritage Site Requirements, needs to be included. See the UNESCO section for details.
- 6) Key Strategy #1 should be moved to Key Strategy #4, with the required changes to show that in all of those initiatives, commemorative and ecological integrity will be a first priority in decision making regarding tourism and visitor use of the site. If resourcing is limited, then items in this section that are taking resources away from cultural and ecological integrity requirements, should be removed.
- 7) The planning position should answer to a senior manager who has a clear mandate for heritage. Either to a senior heritage manager (as recommended in the resourcing section) or, in the present structure, directly to the Director of Ontario Waterways. That position should be independent from power influence to business development.
- 8) Any work on a Visitor Experience Program, which at present is a simply a pure tourism program, should be reviewed by qualified heritage staff. For Parks Canada to meet its own legislated and policy requirements, any visitor experience program should be fully integrated into interpretation and public education programming. It also needs to be subject to a full CRM equivalent review which would include both its impact on the site in terms of commemorative and ecological integrity and how well it serves Parks Canada's NHS and WHS obligations to interpretation and public education. A commitment to do a commemorative and ecological integrity review of all visitor experience initiatives should be in the plan.

## 2.0 Commemorative Integrity

### 2.1 Legislative & Policy Requirements:

Section 32 of the Parks Canada Agency Act states that any national historic site management plan **must include commemorative and ecological integrity.**

In addition, the Parks Canada Agency Act states that "*it is in the national interest ... to ensure the commemorative integrity of national historic sites*" and "*to maintain ecological and commemorative integrity as a prerequisite to the use of national parks and national historic sites*" and "*to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity*"

Parks Canada Guiding Principles and Operational Policy:

#### ***Ecological And Commemorative Integrity***

*Protecting ecological integrity and ensuring commemorative integrity take precedence in acquiring, managing, and administering heritage places and programs. In every application of policy, this guiding principle is paramount. The integrity of natural and cultural heritage is maintained by striving to ensure that management decisions affecting these special places are made on sound cultural resource management and ecosystem-based management practices.*

*It is recognized that these places are not islands, but are part of larger ecosystems and cultural landscapes. Therefore, decision-making must be based on an understanding of surrounding environments and their management.*

### 2.2 Ministerial Directives

In 2017, as a result of the Let's Talk Parks Canada consultations, the Minister issued a directive to Parks Canada for "***An emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs.***"

In addition, in December 2018, the Minister formed a working group stating "*Following the largest ever consultation on Parks Canada [2017 Let's Talk Parks Canada consultations], a working group of experts in many fields will help us implement one of the recommendation from Lets Talk Parks, Canada, making sure that ecological/commemorative integrity is at the forefront of our decisions.*"

### 2.3 Synopsis

Clearly a main measure of the plan must be how it serves to maintain the commemorative integrity of the Rideau Canal and how it shows that commemorative integrity is at the forefront of decision making on the Rideau Canal. There are five direct references in the draft plan to commemorative integrity, two are simply perceptual references (no meaning references in sections 3.4 and 4.0), and three are semi-substantive references (in sections 2 and 3) with only one listed in an objective (heritage landscapes). This immediately shows a significant problem with the plan, the imbalance of priorities, directly counter to the Parks Canada Agency Act and Ministerial Directives. The plan does not meet the requirement for Parks Canada to maintain the site in a state of commemorative integrity. Commemorative Integrity must

be a central theme of the plan, it is not. Every reference must also be backed up by objectives and targets within the document, presently they are not.

## 2.4 Detailed Evaluation

Since the management plan is a public document that requires public clarity and understanding, and since the term Commemorative Integrity is misused in some sections of the draft plan, I'll start with a brief review of what Commemorative Integrity actually means. The plan itself will also have to make this definition clear since a) the term is clearly being misused in some sections of the plan and b) the definition is needed for public clarity, "commemorative integrity" is not a term understood by the general public. I have a letter from the former Director of Ontario Waterways that uses the example of oTENTiks as evidence of how Parks supports commemorative integrity. This shows a clear misunderstanding within the present administration of the Rideau Canal of what commemorative integrity actually means.

Commemorative integrity is a cultural heritage concept dealing with the authenticity of a National Historic Site of Canada and how the heritage values of the NHS are communicated to the general public. Of note, while Parks Canada developed the term, it now part of any modern heritage lexicon.

It has 3 main components:

- 1) **Built Heritage** – the condition of the heritage works on the site. On the Rideau this includes things such as the locks themselves, associated buildings (lockmaster houses, blockhouses) and engineering works such as dams and weirs. An allowed exception is with matters of significant public safety, so we see modern dams and weirs at critical places such as Poonamalie and Hogs Back. Even there, any changes must be fully reviewed against Parks Canada's cultural resource policies (CRM) and be as conformable as possible to the heritage values of the site.
- 2) **Heritage Landscapes** – the authenticity of heritage landscapes is a key component of commemorative integrity. This is particularly critical for the Rideau Canal which is, in essence, one large heritage landscape. It is most clearly applied to the lockstations themselves, each a heritage landscape of its own (each lockstation has different heritage characteristics).
- 3) **Public Education** – that the reasons for the NHS designation are effectively communicated to the public to create a public awareness of the heritage values of the site.

Another good definition, directly from Parks Canada, is that:

A national historic site possesses commemorative integrity when:

- **the resources directly related to the reasons for designation as a national historic site are not impaired or under threat,**
- **the reasons for designation as a national historic site are effectively communicated to the public, and**
- **the site's heritage values (including those not related to the reasons for designation as a national historic site) are respected in all decisions and actions affecting the site.**

By that measure alone, the Rideau Canal is currently **not** in a state of commemorative integrity. The term is also mostly used in the plan solely in reference to built heritage, which is only one of the three components of commemorative integrity.

It is to be noted here that UNESCO has essentially these exact same three requirements: the protection and maintenance of built heritage, protection of heritage landscapes and the visual character of the canal, and public education regarding the Outstanding Universal Values (the reasons for the designation) of the site. As noted in the UNESCO section, this management plan must directly address WHS issues since there is only one management system for the site and UNESCO, in 2019, quite clearly stated to the Government of Canada that the management system for the Rideau Canal does not adequately protect the outstanding universal values of the site. Parks Canada has stated that no new separate WHS plan will be created for the Rideau Canal, so this plan must cover all WHS requirements, including the integrity of the landscapes and public education regarding the OUV of the site.

Fully addressing commemorative integrity for the Rideau Canal is needed for both its NHS and WHS designations.

## 2.5 Imbalance of Priorities

A fundamental problem of the plan, which will require a significant re-write to correct, is that **commemorative integrity is not shown as being a priority**, counter to the Parks Canada Agency Act, Ministerial Directives and UNESCO requirements. Some of this has been detailed in Section 1.0.

However, to show a specific example of the imbalance of priorities related to commemorative integrity is Objective 1.2 under Key Strategy #1 (tourism), which states “By 2024, two (2) master plans are developed, in collaboration with key stakeholders, for strategic lock stations (and/or groups of lock stations), that outline priorities for future site improvements to support visitor experience and canal operations.” Examples cited are Kingston Mills, Jones Falls or Ottawa. Under Key Strategy #2 (commemorative integrity) we see under Objective 2.1 “By 2030, the cultural landscapes at 5 key lock stations are described and documented to support the commemorative integrity of the waterway as well as visitor experience opportunities that support heritage connections.”

In order to maintain the commemorative integrity of those lockstations, Objective 2.1 has to be completed before Objective 1.2. I know for a fact that Parks Canada does not presently know the commemorative integrity values of those three lockstations. You cannot do a recreational tourism plan without first knowing all the commemorative values of the site.

If Parks Canada is to meet commemorative integrity requirements on the Rideau Canal, those Key Strategies must be reversed. Key Strategy #2 has to be the priority over Key Strategy #1. That's stated right in the Parks Canada Agency Act, “**to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity** and a quality experience in such heritage and natural areas for this and future generations.”

Bottom line is that this management plan must clearly show that ecological and commemorative integrity are at the forefront of Parks Canada decision making on the Rideau Canal. That requirement, founded in

legislated and emphasised with ministerial directives, must be clearly reflected in any new management plan. This requirement is not met in the current draft plan.

Commemorative integrity will be dealt with in more detail under sections that directly deal with this issue, including the sections on the presentation of cultural heritage, the protection of built heritage and the protection of cultural landscapes.

## 3.0 Public Clarity and Accountability

### 3.1 Legislative Requirements:

Section 32 of the Parks Canada Agency Act states that Parks Canada will “provide the Minister with a management plan for that national historic site or other protected heritage area in respect of any matter that the Minister deems appropriate, including, but not limited to, commemorative and ecological integrity, resource protection or visitor use, and that plan **shall be tabled in each House of Parliament**.

This means the management plan is a public document which therefore must be written with public clarity in mind. In addition to clarity, it's a public document tabled in parliament in order to show accountability of how Parks Canada is managing the site on behalf of all Canadians.

There is also the UNESCO requirement that management plans: “Be accessible and easily understood by all stakeholders, avoiding excessive use of jargon.” In terms of accountability, a focus of UNESCO is on outcomes (achieving objectives). Those are required in any management plan for a World Heritage Site.

### 3.2 Synopsis

The plan, as written, fails to deliver on both public clarity and public accountability. The obtuse language in the plan and the use of Parks Canada lexicon terms (jargon) without definition, serve to make the plan very vague. The wording in several sections makes the plan open to ambiguous interpretations and creates a false impression of Parks Canada’s current management of the site. This is not public clarity.

Public clarity also requires a full explanation of Parks Canada’s mandate on the Rideau Canal, including a clear public explanation of the complex jurisdictional issues. Section 3.1 (Geopolitical) notes that there are jurisdictional complexities, but those are not described anywhere in the document (or anywhere in the public domain, ie. Parks Canada’s website).

The failure of accountability is a four fold. One is the lack of hard, result oriented, measurable objectives and targets in the plan itself. Two is the complete lack of implementation information – either as ancillary documents or as defined systems that would provide that information to the public. Three is the lack of clearly defined and measurable outcomes. Four is the lack of public accountability mechanisms, clearly described in detail, and embedded in this plan.

### 3.3 Detailed Evaluation

#### Definition of terms

The use of terms such as “key stakeholders”, “partners”, “master plans”, “Visitors Experience Strategy,” “learning indicators” and “Annual Implementation Updates” are meaningless without a definition of who/what these are in the context of how they are used in the plan. You will see these noted against their use in the plan in Section 2 of this review. But the general point is that these are terms not understood by the public and in many cases ambiguous in terms of meaning and many don’t reflect what is seen on the canal itself. They are, to quote UNESCO, excessive use of jargon. There are lots of

references for instance to engagement with key stakeholders and partners. I am a key public stakeholder, lake associations are key stakeholders, some NGOs such as Friends of the Rideau are technically a partner. But Parks Canada doesn't engage with us, so to who/what are these terms referencing? Some can be inferred from the section they are in, so stakeholders in Key Strategy #1 would, one assumes, be to tourism stakeholders. But it is very unclear. The use of those terms in this document contributes to a lack of public clarity and often creates a false impression.

Another example is the term "Master Plan" which shows up in the tourism section (Key Strategy #1) so one would assume it's a tourism plan for the site. But it's not defined. Since commemorative and ecological integrity are supposed to be core components of any site plan, how are those requirements addressed in a "Master Plan." That information needs to be known in order to make the plan in any way accountable. This is where an ancillary document should be included, detailing what a Master Plan actually is.

Parks Canada's "Visitor Experience Program" does not contain any substantive public education regarding the cultural heritage and ecological values of the site since that program was developed outside of its ecological and cultural heritage interpretation programs. So while an expectation is that any "master plan" for a lockstation will contain robust public interpretation, unless the term is fully defined, we don't know.

Objective 1.2 states that "By 2022, a Visitor Experience Strategy is developed for the Rideau Canal." That phrase, in and of itself is meaningless unless "Visitor Experience Strategy" is clearly defined. It's listed under tourism so we might assume it's simply a tourism plan for the Rideau Canal. But since any such tourism plan must fully address commemorative and ecological integrity, for public (or any) clarity, the details of what a "Visitor Experience Strategy" actual is needs to be in this document.

What is an "Annual Implementation Update"? A detailed definition is required to allow the public to see if it will provide accountability. Is it a one page listing of metrics or a detailed annual review of the implementation of the management plan that provides public accountability? It needs to be fully described.

### **Jurisdictional Complexities**

This is one of the most significant issues when it comes to public understanding of Parks Canada's management of the Rideau Canal and inter-government understanding of the roles they all play. There are multiple pieces of federal legislation that apply as well as provincial legislation. It's administered by a host of government organizations; Parks Canada Agency, Canadian Coast Guard, Province of Ontario, Ontario Ministry of Natural Resources, Counties, Municipalities, Indigenous Governance, and Conservation Authorities, to name a few.

A significant point of public confusion is the lack of any clear explanation of this highly complex jurisdictional regime. What exactly is Parks Canada responsible for on the Rideau Canal? What has it devolved to other government organizations? What are the responsibilities of those other government organizations when it comes to the Rideau Canal? We have, in recent years, seen lots of "it's not our jurisdiction" from Parks Canada. That jurisdiction, both Parks Canada's direct responsibilities and those of

other governments and government organizations must be detailed in this plan. Without it, there is no public clarity or accountability.

A new section is required in the plan detailing the entire jurisdictional regime of the Rideau Canal to a level detail required for full public clarity. This should also be public information, posted to Parks Canada's Rideau Canal website.

#### **Lack of Actions** (measurable or otherwise accountable)

A key component of accountability is what happens on the site, the results of actions taken to meet strategies and objectives. To be accountable, items in the management plan must be result oriented actions on the site. That is mostly lacking from this plan. We see many processes, but few actions related to those processes. It's to be noted that a process is not an action or result – it's the means to developing actions and achieving results. It's the latter two that are lacking in this plan.

In example, under Key Strategy #1, there is an objective to create master plans for some lockstations. But there is nothing in the plan about implementing those plans within the 10 year timeframe of the plan.

Part of this problem goes back to the restrictive “high level” format which doesn't allow for detailed actions that will support accountability to be included in the plan.

Actions must also be substantive. Simply collecting metrics for instance, is supposed to be a means to achieving a result and often is not a good accountability indicator (quantitative rather than qualitative). So we see “an increase in our learning indicators” (presumably metrics), which carries no public meaning and contains no substantive accountability. We also see this Parks' surveys and other metric collection mechanisms (how many visitors to the website, etc.). Accountability can only be achieved with substantive measures of how Parks Canada is meeting its mandate on the Rideau Canal. These are not in this plan.

## 4.0 Presenting Cultural Heritage

### 4.1 Legislative Requirements:

Parks Canada Agency Mandate: "*foster public understanding*" and "*ensure commemorative integrity*."

Parks Canada Agency Act:

- *to present that [natural and cultural] heritage through interpretive and educational programs*
- *to carry out Canada's international obligations and agreements* [UNESCO requirements for public education to foster understanding of the OUV of the site]

Ministerial Directive: for Parks Canada to place: "*An emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs.*"

World Heritage Convention: "protection, conservation, **presentation, and transmission to future generations of the cultural and natural heritage ...**"

Parks Canada's Framework for History and Commemoration (2019): "*As a federal cultural institution that is a trusted authority, Parks Canada has an obligation to share and present well researched history, including traditional knowledge and oral traditions, at its heritage places.*"

Parks Canada Guiding Principles and Operational Policies:

#### **Education and Presentation**

*The long-term success of efforts to commemorate, protect, and present Canada's natural and cultural heritage depends on the ability of all Canadians to understand and appreciate this heritage, and to personally adopt practices which are sensitive to heritage and the environment. This is encouraged through a variety of communication, interpretation and outreach programs and demonstrated leadership at the local, national and international levels.*

### 4.2 Foundational Requirements

Public understanding of the heritage values of the site, for them to value the Rideau Canal as more than a simple recreation waterway, is the main reason for cultural heritage presentation and the reason it's embedded into the Parks Canada Agency Act and into heritage concepts such as commemorative integrity. That public understanding of the heritage values of the site is also a UNESCO requirement, for exactly the same reasons. Non-understanding of those values has real world consequences such as the funding battles in 2012-13, where MPs were characterizing the Rideau as simply a "recreational waterway for rich boaters." Parks Canada can and should change that perception, all that is required is to follow their legislated heritage mandate in the management of the Rideau Canal. The draft plan, as written, actually fosters the incorrect and dangerous view that the Rideau Canal is simply a recreational waterway.

World heritage sites, such as the Dresden Elbe Valley have been delisted as World Heritage Sites due to the State Party's (country) failure to convey the heritage values of the site to local residents, to foster

their understanding of Outstanding Universal Value of the site, to make them care about those. That's very much a real-world reason to do cultural heritage presentation and public education.

Those foundational requirements for a public understanding of the cultural values of the site, including the reasons for its NHS and WHS designations, are a core requirement of Parks Canada's administration of the Rideau Canal. The valuing of the cultural heritage of the Rideau Canal by Canadians is one of the most important heritage protection mechanisms for the canal. The same applies with regard to protecting ecological integrity.

### 4.3 Current State of Site

Parks Canada has been running the Rideau Canal, since 2012, with no substantive public education programs or heritage interpretation programs and has no qualified heritage staff to be able to create these or deliver them. As previously noted, the visitor experience program does not contain any robust public education or heritage interpretation. The most obvious and clear example of the problem is the Rideau Canal website, which was re-designed in 2017, stripping all previous heritage components from the site. It took intense lobbying to get any heritage put on the site, the first bit appeared after the site had been up for 687 days. To see where the Rideau was in 2017, just look at History and Culture section on the Trent-Severn Waterway website which is run by the same management team ([www.pc.gc.ca/en/lhn-nhs/on/trentsevern/histoire-history](http://www.pc.gc.ca/en/lhn-nhs/on/trentsevern/histoire-history)).

Heritage information that has appeared on the Rideau website has been full of errors of historical fact, a clear well documented indication that Parks Canada has no internal resources capable of accurate content creation. This is in direct contravention of the 2019 Parks Canada Framework for History and Commemoration which specifically states that "***Parks Canada has an obligation to share and present well researched history.***" It doesn't do this on the Rideau Canal. UNESCO has similar requirements, noting that a component of resourcing is intellectual resourcing, providing the knowledge and skill capabilities to be able to create and deliver public awareness programs regarding the OUV of the site. The Rideau Canal does not have those resources. I have recently helped out Parks to correct some of their website issues, but the process has not been what I would term a collaborative one, Parks Canada makes the process of helping them very difficult (see Public Engagement).

### 4.4 Synopsis of the Draft Plan

Key Strategy #2 is the section that deals specifically with presentation. The first thing to note is in the preamble where it states "***The Rideau Canal must find a way to work within its means as resources are finite.***" It's the only resourcing limitation mentioned in the entire plan and it is in the heritage section. It goes directly counter to the 2017 ministerial directive of "***the need to dedicate additional resources to education and interpretive programs.***"

Secondly there is nothing, other than Objective 2.3, which deals at all with presentation. Objective 2.3 is a fluff tourism statement (no substance), which includes a restrictive statement "through the use of new and emerging technologies" and does not deal with heritage interpretation and public education. I am a technology person and well understand the use and also the limitations of new technologies. Too often

these references are used by the layperson as a perceptual indication of “modern and innovative” rather than being “the most effective tools.” That appears to be the case with this reference.

Educational and interpretive programming (which the visitor experience program is not) must be shown as clear objectives with measurable targets, including a commitment to resourcing.

It's to be noted here that the presentation of cultural heritage goes beyond human interpretation and education (of whatever form – signage, brochures, live interpretation, internet, apps, etc.) it also extends to how the heritage landscapes are managed. In particular, significant problems with key heritage viewscapes such as clear views of original engineering structures (ie. the Great Stone Arch Dam at Jones Falls) and clear views to and from built heritage features such as blockhouses and defensible lockmaster houses, now obscured by vegetation, must be addressed. Those viewscapes are a significant site presentation issues that must be addressed in the management plan (see Heritage Landscapes for more details).

#### **4.5 Detailed Evaluation**

This is more of what's not in the plan to what is in the plan. The sole objective related to presentation is:

**Objective 2.3: Ecological and Cultural Aspects of the Rideau Canal Are presented to visitors and Integrated in Tourism**

Target: The next Visitor Information Program survey shows an increase in its learning indicator as visitors at the Rideau Canal are educated about the cultural and natural heritage of the Rideau Canal through the use of new and emerging technologies.

The target is completely unsubstantive. It's a pure tourism statement that contains a significant restriction that limits presentation to the “use of new and emerging technologies” – a statement on its own that carries no meaning. Those often aren't the most effective interpretation tools, and as noted previously, all interpretive and presentation methodologies should be used, under an integrated program created, implemented and managed by qualified heritage staff.

Objective 2.3 should be removed since it is actually two separate things. The first is the presentation of cultural heritage and ecology which would require the creation and implementation of a robust interpretation and public education program by qualified heritage (cultural and natural) staff and then, in addition to those interpretation and pubic education programs, components of those would be integrated with tourism under the direction of heritage staff.

For Parks Canada to meet its cultural heritage presentation obligations, Key Objective #2 must include **the following additional objectives**, each with measurable targets:

- 1) An objective to properly resource the Rideau Canal to be able to develop (content creation) and implement interpretation and public education programs. This means qualified heritage staff.\*
- 2) An objective to undertake a robust integrated interpretation and public education program specifically designed to meet both the PCA Act and UNESCO WHS public awareness requirements of the NHS values and the OUV of the site.

- 3) An objective to work with public stakeholders who have expertise in the cultural heritage of the Rideau Canal and engage them in a meaningful and fully co-operative way.
  - 4) An objective to provide basic heritage training to lock staff.\*\*
  - 5) An objective to open up key cultural viewscapes at lockstations as part of passive heritage presentation.\*\*\*
  - 6) An objective to engage local schools with the Rideau Canal, to develop programs that will involve local children/young adults, to provide them with an understanding of the cultural heritage of the Rideau Canal and how that relates to the communities they live in.
- \* Qualified means a heritage background and prior experience with heritage at Parks Canada National Historic Sites (seasoned Parks Canada heritage staff). The heritage of the Rideau Canal is so vast and complex that it takes years for even an experienced heritage person or historian to become in any way familiar with the Rideau. This knowledge is not transferrable to the Trent-Severn which has its own, very different, history. Those heritage people must also be people who are willing and tasked with directly engaging with local Rideau cultural heritage experts, in order to assist Parks Canada in achieving an accurate and substantive heritage presentation of the site.
- \*\* Lockstation staff should know the basic heritage story of any lockstation they are on. In addition, some basic heritage information about the overall history and engineering of the Rideau Canal is required for them to properly answer questions from the public. Last (2020) summer I had an email from a paddler who tried to find the answer from lockstaff about how to identify original lock stones. Some lock staff seemed to know but weren't sure why, most didn't know. It's an easy answer that all lockstaff should know in addition to all the other heritage details of the lockstation they are serving at. In this case the paddler came away confused and emailed me, I provide him with the answer.
- \*\*\* I tried to get this initiative started in 2008. This is a passive heritage presentation concept (a well established heritage presentation principle). The concept was approved by Parks Canada who noted that several Rideau Canal sites had "***significant cultural viewscapes that needed to be recovered and a clear viewscape maintained.***" A start was made for Upper Brewers, Davis, Jones Falls and Newboro, including all the Parks Canada required environmental clearances for this work. At Upper Brewers it was done by the new lease holder of the lockmaster's house (not with Parks Canada's knowledge), at Davis it was partially (one side) done by the lockmaster, at Jones Falls the environmental clearance of trees to provide a clear full view of the stone arch dam was obtained as well as the clearance of a viewscape from Sweeney House to Whitefish Lake, but no work was done. At Newboro, there were environmental clearances to restore the view of the Blockhouse to/from Newboro Lake, but no work was done. There are very specific heritage presentation reasons why this must be done to help foster public understanding of the site. This is detailed under Protecting Heritage Landscapes. Of note, the work was not done, and remains not done due to the shift in management and policy direction away from heritage at that time. It remains another tangible example of Parks Canada's ignoring its heritage mandate on the Rideau Canal. See Section 7.0, Protecting Heritage Landscapes for details.

## 4.6 Presenting Indigenous Cultural Heritage

The above comments relate to Parks Canada direct legislated requirements to Commemorative Integrity and the presentation of cultural heritage related to the NHS and WHS designations of the canal. But Parks Canada also has a responsibility to present indigenous history. The policy requirement for this is shown in Parks Canada's Framework for History and Commemoration: National Historic Sites System Plan 2019, including:

**3. Seek opportunities for Indigenous peoples to share and communicate their history, on their own terms**

*Parks Canada will continue to build strong relationships with Indigenous peoples. The Agency will seek out opportunities for co-development of historical research, interpretation and programming. This includes ensuring that Indigenous histories, in the voices of Indigenous peoples, are better shared with, and communicated to, visitors at heritage places.*

In the plan, Section 3.3 Indigenous Peoples and the Rideau Canal, speaks, with several errors, to indigenous involvement. The problem evident in section 3.3 is trying to inappropriately fit the indigenous story into the story of the construction of the canal, rather than looking at the long and rich history of indigenous use of the Rideau route. As noted in several Parks Canada policy documents, including the above referenced Framework, history at historic sites should be all encompassing, not just related to the designation of the site. It should also be well researched and accurate.

In addition, with indigenous history, an opportunity must be provided for indigenous communities to tell their own stories in their own words. This can be built into an overall heritage presentation framework for the Rideau Canal (such a framework does not presently exist). While Parks Canada has the specific mandate to present the cultural heritage represented by the sites designations (NHS and WHS), it should, in the 21<sup>st</sup> century, be providing formal avenues for those indigenous stories. Since a heritage unit for the Rideau Canal will have to be built from scratch, this is in fact a very good opportunity to set up systems and processes that will allow the indigenous stories of the Rideau to be properly communicated to the general public.

The indigenous story is not being told by Parks Canada and all the arguments shown in this document about lack of heritage staff, lack of heritage resourcing and lack of cultural heritage presentation and public education apply here. Ontario Waterways does not have the heritage skill sets in place to design and deliver a comprehensive story of indigenous use. The only objective is Objective 2.2

**Objective 2.2: Indigenous Peoples Have Meaningful Opportunities to Connect with traditionally used lands and waters and Share Their Cultures**

Targets:

The Algonquins of Ontario and the Mohawks of Akwesasne are engaged on an annual basis to discuss initiatives related to presentation of Indigenous cultures, histories and perspectives on the Canal.

Firstly this is shown as only being on an annual basis and there are no targets to actually incorporate the “presentation of Indigenous cultures, histories and perspectives on the Canal” into a needed Rideau Canal

interpretive and public education program. The indigenous story needs the same depth of presentation as NHS and WHS public education requirements.

Similar to the issues regarding public engagement with the Rideau public, public engagement with the indigenous community should be meaningful and on-going. It should involve relationship building. Recent reports regarding the problems with Parks Canada's management of Wood Buffalo National Park have had the very legitimate complaint by indigenous communities of Parks Canada's top down approach to engagement. It doesn't work there, it doesn't work here (or anywhere).

Parks Canada needs to have historians and archaeologists directly working with the local indigenous communities to build up the cultural heritage knowledge base of indigenous use of the lands and waters of the Rideau route. It is that type of engagement needed to properly create any sort of meaningful indigenous cultural heritage presentation of the Rideau. An annual meeting is not an effective methodology to do this.

## 5.0 Presenting Natural Heritage

### 5.1 Legislative Requirements:

Parks Canada Agency Mandate: “*foster public understanding*” and “*ensure their ecological and commemorative integrity.*”

Parks Canada Agency Act:

- *to present that [natural and cultural] heritage through interpretive and educational programs*
- *to maintain ecological and commemorative integrity*

Parks Canada Guiding Principles and Operational Policies:

#### Education and Presentation

*The long-term success of efforts to commemorate, protect, and present Canada's natural and cultural heritage depends on the ability of all Canadians to understand and appreciate this heritage, and to personally adopt practices which are sensitive to heritage and the environment. This is encouraged through a variety of communication, interpretation and outreach programs and demonstrated leadership at the local, national and international levels.*

### 5.2 Foundational Requirements

The Rideau Canal is a human altered waterway (flooded) with only 10% being “man-made” in terms of what people think of as being a canal (excavated ditch). It is a significant natural environment and contains a number of important ecosystems for the region. It goes through many different types of human development, from low density cottage and summer home development to urban centers. That development is now accelerating in the 21<sup>st</sup> century. Those people all play a role, whether they know it or not, regarding the environmental health of the waterway. Public understanding of their actions with respect to the natural environment is a key component of maintaining ecological integrity. Ecological integrity cannot be achieved without the co-operation of these residents, and that requires public understanding. Parks Canada, can, and should play a strong role in this, in co-operation with other agencies (i.e. conservation authorities, municipalities, provincial agencies) and the general public (individual waterfront owners and NGOs such as lake associations).

### 5.3 Current State of Site

Parks Canada does essentially no interpretive or educational programs when it comes to ecological integrity. It does not foster public understanding to ensure the ecological integrity of the Rideau Canal. One needs to look no further than the Nature and Science section of their Rideau Canal website to see the problem ([www.pc.gc.ca/en/lhn-nhs/on/rideau/decouvrir-discover](http://www.pc.gc.ca/en/lhn-nhs/on/rideau/decouvrir-discover)). It should contain a robust description of the Rideau’s ecosystems, including, but not limited to, species at risk. It should contain information about the role waterfront owners can and do play, including best practises when it comes to permitting requirements such as in water and near shore work. Parks Canada used to do this, but those initiatives were abandoned in the mid-2000s.

## 5.4 Synopsis of the Draft Plan

The word “ecological” appears once in the draft plan, in objective 2.3. Section 3.5 in the previous section of this review details the problems with that objective (simply an unsubstantive tourism statement).

There are no objectives or targets dealing with the maintenance of ecological integrity.

Section 3.5 of the plan, Nature Legacy, provides (with several significant errors and omissions) a précis review of the natural environment. But there are no Key Strategies, no Objectives, no Targets that deal with the maintenance of ecological integrity and nothing dealing with the need to foster public understanding and to present the natural heritage of the Rideau Canal through interpretive and educational programs. All of those are legislated requirements. They are also required, as noted in Foundational Requirements, as critical requirements if the ecological integrity of the Rideau Canal is to be maintained.

## 5.5 Detailed Evaluation

As with the presentation of cultural heritage, this is about what is not in the plan (since there is nothing in the plan dealing with ecological integrity).

For Parks Canada to meet its natural heritage presentation obligations, several objectives must be added under Key Strategy #2 which deals with sustainability (which must include ecological integrity) and presentation.

Key Objective #2 must include **the following additional objectives**, each with measurable targets:

- 1) An objective to properly resource the Rideau Canal to be able to develop (content creation) and implement public education programs. This means qualified ecological interpretation staff.\*
- 2) An objective to undertake a robust integrated interpretation and public education program specifically designed to meet both the PCA Act and Species at Risk Act requirements for public awareness of the ecological issues and the role residents, visitors and others play in maintaining ecological integrity and species at risk habitat protection.
- 3) An objective to populate the Nature and Science section of the Rideau Canal website with a full description of the Rideau’s ecosystems, species at risk (species & habitat), and Parks Canada scientific data related to ecological integrity.
- 4) An objective to include public awareness and best practises as part of the permitting process and to publish this information on the Rideau Canal website.
- 5) An objective to work with public stakeholders who have expertise in the ecological integrity of the Rideau Canal, including NGO organizations such as lake associations, and engage them in a meaningful and fully co-operative way. To assist them with the presentation of the natural values, and best practises required to maintain ecological integrity.

- 6) An objective to work with local schools, to develop field programs that will help to teach local children/young adults the natural heritage of the Rideau Canal and their role as citizens located in the watersheds of the canal, of the impact of their actions and those of others on the ecological integrity of the Rideau Canal and why it's important to maintain the ecological integrity of the canal.
- \* Qualified means a environmental background and prior experience with ecology at Parks Canada sites (seasoned Parks Canada ecological staff). Parks Canada does have some of this staff, but they are invisible on the Rideau Canal. A requirement for this is environmental staff with good public communication skills and a willingness to work in a meaningful co-operative manner with the engaged public and NGOs such as lake associations.

## 6.0 Protecting Built Heritage

### 6.1 Legislative Requirements:

Parks Canada Agency Act:

- to **protect** the nationally significant examples of **Canada's natural and cultural heritage** in national parks, national historic sites, national marine conservation areas and related heritage areas in view of their special role in the lives of Canadians and the fabric of the nation,
- to **carry out Canada's international obligations and agreements to protect, conserve** and present that **heritage** and to contribute towards the protection and presentation of the global heritage and biodiversity

In addition, the Act requires that any Parks Canada management plan must include **commemorative and ecological integrity** and **resource protection**.

Policy requirements to maintain historical sites in a state of commemorative integrity, a significant component of which is the integrity of built heritage on the site.

### 6.2 Foundational Requirements

Sheila Fraser, in her 2003 Auditor General of Canada's report on built heritage, which led to Parks Canada's 2012 National Asset Review and the current infrastructure program, provided a reason why we see the protection of built heritage embedded into legislation, such as the Parks Canada Agency Act:

*These places recall the lives and history of the men and women who built this country, and they foster awareness of how Canadian society evolved. They help us to better understand the present and prepare for the future. They contribute in important ways to Canadians' sense of belonging to their community.*

The other foundational point is that once a piece of built heritage is lost, it can't be replaced. It can be rebuilt, but its original heritage value is gone. Part of the reason for many National Historic Site of Canada designations are original buildings/structures on their original landscapes. That's the case with the Rideau Canal. To prevent loss, heritage structures must be protected and maintained.

### 6.3 Current State of Site

The infrastructure program is taking care of many (but not all) of the larger engineering works issues identified in the 2012 National Asset Review. However the Rideau remains severely undercapitalized and many smaller problems, such as crumbling masonry at lockstations and in approach channels, are being ignored. Other built heritage, such as lockmaster houses and blockhouses, which were identified in the 2012 national asset review, are not being dealt with other than to convert some of those (i.e. Davis Lockmaster's house) with a modern, non-heritage, interior (as an upscale rental offering). Some other significant built heritage issues, such as the modern cement "short term repair" (2007) of the monoliths at

Jones Falls, remain unaddressed. There is no sustainable capital budget to ensure the adequate maintenance of the current built heritage.

We also don't know the current state of the site when it comes to the condition of built heritage since Parks Canada, in the draft plan, only cites (incorrectly) the total value of the heritage assets based on the 2012 National Asset Review.

#### **6.4 Synopsis of the Draft Plan**

A fundamental flaw with the Draft Plan is that the only protection objectives and actions deal only with engineering structures. A commitment under Objective 2.1 to maintain by 2029, at least 70% of the engineering works of national significance to fair or good condition is a statement that Parks Canada intends to leave up to 30% of those assets in poor or very poor condition. That's not acceptable.

In addition, there is no mention of other built heritage, other than Objective 1.2 with plans to convert heritage structures at five (5) lockstations into accommodation offerings. We see the example with the Davis Lockmaster's house of Parks Canada, converting the interior of a heritage structure with a very modern interior. That's a major problem. Any conversion has to be heritage appropriate to the structure.

There is also a point of confusion on the part of Ontario Waterways regarding what is built heritage on the Rideau. In Section 3.1 it puts only engineering structures into the total value of \$929 million (2012\$ - the National Asset Review Rideau total) and then lists "other structures, like blockhouses and lockmaster's houses" as separate items. The \$929 million includes blockhouses and lockmaster's houses. The National Asset Review wasn't restricted to just engineering structures. While that may be a restriction of the current infrastructure program, the original problem is with all built heritage, not just the engineering structures. It's also not an up to date number, the current valuation of all the built heritage on the Rideau Canal should be in the plan, not the 2012 ballpark estimate.

#### **6.5 Detailed Review**

Objective 2.1, Target:

By 2029, at least 70% of engineering works of national significance are maintained in fair or good condition.

I'm aware that Waterways is between a rock and hard place on this with the significant problem of under-capitalization of the Rideau Canal. Parks Canada has put heritage canals at the bottom of its priority list (a long standing problem). Parks Canada is unwilling to fund the Rideau Canal at a level that will allow it to meet its heritage (built or otherwise) mandate. That's a matter of internal Parks Canada priorities.

As a heritage advocate for the Rideau Canal, I would like to see a commitment to 100% of **all the built heritage** on the Rideau Canal, not just the engineering works, being in fair to good condition by 2030 as an objective. This is also a requirement under the World Heritage Convention. Our UNESCO WHS designation is based, in part, on the fact the Rideau Canal "*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.*" In seeking a World Heritage designation for the Rideau Canal,

Canada made the commitment to maintaining those original structures. It is not meeting this commitment on the Rideau Canal and the draft management plan now quite clearly states that it does not intend to meet that commitment over at least the next 10 years.

It is to be noted that in Parks Canada's 2016-17 Report on Plans and Priorities it committed to:

**Expected Result:** Condition of heritage canal, highway and townsite assets in poor or very poor condition is improved to fair or good.

**Performance Indicator:** Percentage of assets assessed to be in poor or very poor condition that have improved to fair or good.

**Target:** 100%

**Target Date:** March 2020

Now, in the draft plan, we see that a much lower objective of only 70% of the engineering works to be maintained in fair or good condition with a target date of 2029. It's another example of what Parks Canada says and what it does being two different things. This is very worrying in terms of the current draft plan.

If the lower objective of 70% of the engineering works of national significance are maintained in fair or good condition is a reflection of expected capital & maintenance funding levels by Parks Canada, then I'd like to see a much stronger statement regarding under-capitalization. Senior managers on a site such as the Rideau Canal should be advocates for their sites. We've seen this in the past with some of the Superintendents who were strong advocates for the Rideau Canal, this should be the case now.

Objective 2.1, Target:

Long term asset management plans that protect and maintain the cultural and natural significance of the Rideau Canal are developed by 2025 and are reviewed annually.

As a semantic point, the creation of a plan is a process, the implementation of a plan is a result. Plans don't do protection on their own, the funding and implementation of those plans is the protection and maintenance part.

So my recommendation for a wording change would be “

Long term asset management plans that, if sufficiently funded and implemented, will protect and maintain the cultural and natural significance of the Rideau Canal, are developed by 2025 and are reviewed annually.

While plans are needed, we've run into problems before due to plans with no implementation, the monoliths at Jones Falls a textbook example of that. Those monoliths were clad in modern cement in 2006/07 as part of a “short term repair” as opposed to a proper heritage repair. The Chief Engineer at the time explained that Parks Canada can do this type of modern repair, which doesn't conform to Parks' CRM policies, if a heritage appropriate repair is planned. Such a heritage appropriate repair was apparently contained in a long term asset management plan. Forward to 2021, those monoliths remain clad in heritage inappropriate cement, and are not part of the infrastructure work at Jones Falls. This is a clear CRM fail on the part of Parks Canada. This leads to another protection of built heritage problem, Statements of Heritage Values.

### **Statement of Heritage Values (SHVs)**

SHVs have been the foundational heritage documents for the infrastructure work in terms of the CRM reviews of the proposed work. But they have never been done for several lockstations and the ones that are done, even those updated to 2017, are incomplete and contain fundamental errors and omissions. An example is again Jones Falls, which a) shows the swing bridge, which was removed from the site over 30 years ago, to be still in place and b) only shows the 1930s cement block repair to the monoliths, no mention of the 2006/07 “short term” repairs.

A new target under 2.1 should be:

By 2025, Statements of Heritage Values for all the lockstation will be completed and brought up to date for all lockstations in collaboration with local heritage stakeholders.

Working with local heritage stakeholders is key since it is clear from existing “updated” SHVs that Parks Canada does not presently have the internal expertise to properly do these. These could be done as part of the cultural landscape reviews, although it’s critical that all SHVs be updated sooner than later. This goes for any heritage inventory for the Rideau Canal – the incomplete nature of the SHVs, call into question any system that will allow proper CRM reviews. Those systems must clearly be updated.

### **Public Reporting of Built Asset Condition**

Another required objective is a public reporting system of the current state of built heritage on the Rideau Canal, essentially what was in the 2012 National Asset Review, but in a form that is easily understood by the public and meets both Parks Canada and UNESCO requirements for the monitoring and reporting of the state of built heritage. As previously noted, the 2012 National Asset Review included all built heritage, not just engineering structures plus other assets such as roads, wharves, parking lots and non-heritage buildings.

Under Objective 2.1, an existing target is that a long term asset management plan will be prepared by 2025. To do such a plan requires exact knowledge of the current state of all assets. So a new objective with that same 2025 target date would be:

By 2025, a public reporting system, showing the state (condition) of all built assets, together with target dates for maintenance/rehabilitation work of those that are in poor or very poor condition, to bring them to fair or good condition, is in place in conjunction with the long term asset management plan and that this report be updated on an annual basis.

As noted, that type of reporting system is also a UNESCO World Heritage Site requirement. Section 8.0 of the 2005 WHS Management Plan for the Rideau Canal states “Conduct regular monitoring of all cultural resources on a cycle not to exceed three years, in accordance with the Parks Canada Agency’s policies, and record and report the condition of assets in the Asset Management System of the Eastern Ontario Field Unit.” That means that, if Parks Canada is actually following its WHS management plan, it must presently have an up to date “Condition of Cultural Resources” list. The 2005 WHS plan provided a full listing of those as 2005 baseline data. This new plan, which Parks Canada has stated will also be the new WHS management plan, must provide a new 2020 or 2021 baseline. Asset condition (whether 70% or the desired 100%) can only be measured against the condition of assets at the starting date of the plan. That list needs to be in this new management plan.

## 7.0 Protecting Heritage Landscapes

### 7.1 Legislative Requirements:

Requirements revolve around commemorative integrity (PCA Act) and UNESCO visual character and maintain the heritage fabric requirements, which include the integrity of heritage landscapes. Integrity and authenticity of heritage landscapes is a key component of Commemorative Integrity.

Parks Canada Agency Act: *it is in the national interest ... to ensure the commemorative integrity of national historic sites*" and "*to maintain ecological and commemorative integrity as a prerequisite to the use of national parks and national historic sites*" and "*to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity*".

### 7.2 Synopsis

Parks Canada has no detailed evaluations of the heritage character of its landscapes. That was officially recognized in a recent State of the Site report and is recognized in the management plan under Key Strategy #2, Objective 2.1. On significant issue relates to priorities and timing since Objective 1.2 under Key Strategy #1 includes developing "master plans" for key lockstations. If the PCA Act is followed, those tourism plans can't be done until the commemorative integrity values of those landscapes are properly documented. There are known issues in this regard at sites such as Jones Falls. To prevent future issues, all the heritage characteristics of the lockstations need to be fully documented first before any visitor plan is created.

In addition, the UNESCO requirement to protect the visual setting of the canal, including their 2019 requests, is not contained in this plan. That visual setting includes heritage landscapes along the entire canal (not just at lockstations), which have not been properly defined (the 2012 consultant's report did not properly define these). This is detailed in the UNESCO section.

### 7.3 Detailed Evaluation

Clearly the cultural landscape Objective 2.1 must be completed before Objective 1.2 is done, those two objectives must be linked both to show commemorative integrity as a priority and to be able to manage visitor use on the site to maintain the commemorative integrity of those landscapes.

The content of the landscape evaluations must be all encompassing, not just the landscapes themselves, but the uses over time of those landscapes, from indigenous use, to the construction of the lockstations, to subsequent use. It should be a full documentation of all the aspects of the site, in order to meet commemorative integrity requirements, which aren't just to the built heritage and the landscape fabric, but also the stories of the site, the information needed for accurate interpretation and public education. This should be a goal of the studies, a thorough documentation of each site. In some cases there is foundation research done by Parks Canada, such as a manuscript report, for other sites, such as Jones Falls, that type of research has never been done by Parks Canada. That's another reason for a need to work collaboratively with local heritage expertise.

The cultural landscapes evaluations shown as a target in Objective 2.1 must include a commitment to public heritage stakeholder involvement since Parks Canada does not contain this internal expertise, particularly with regard to the full heritage values of its lockstation landscapes. These should be shown in the new management plan as collaborative studies using public Rideau heritage expertise.

Parks Canada should also commit to developing a rating system for its heritage landscapes, similar to that used for built heritage. Ratings were given in 2015 for the cursory landscape studies of four lockstations (all rated “good”), but Parks Canada was unable to provide documentation of that rating system, so presumably it does not exist (a rigorous and measurable rating system). That type of rating system is needed both for internal use and for public accountability.

As noted in section 3.0 of this review, a heritage landscape maintenance plan is required in addition to the studies. The studies should lead to actions on the ground, including recovering significant heritage viewscapes. That concept was approved by Parks Canada in 2008 and it was stated by Parks Canada that the Rideau Canal had ***“significant cultural viewscapes that needed to be recovered and a clear viewscape maintained.”*** That must be a listed objective in the management plan.



**The Great Stone Arch Dam at Jones Falls**

Arguably the most spectacular 19<sup>th</sup> century engineering feat on the Rideau Canal, the geographic placement of the dam and how it locks into bedrock on either side of the dam is a significant part of the cultural interpretation of the site. For many years, this view has been obscured by inappropriate vegetation growth. Visitors to the site cannot see the full dam or its placement on the landscape. It was one of the ***“significant cultural viewscapes that needed to be recovered and clear viewscape maintained”*** identified in 2008. All the environmental clearances for the removal of the inappropriate vegetation were obtained by Parks Canada in 2008, but no work was ever done at Jones Falls. It’s a significant problem that I continue to point out to Rideau Canal management. It remains that way today. Parks Canada simply has no one that actually understands cultural landscapes, cultural heritage presentation or even what they would call the “visitor experience” of the site.

**Objective 2.1 needs the following additions:**

1. A commitment to **work with public heritage stakeholders** as part of the heritage landscape evaluation process. Park Canada does not have the internal expertise (detailed heritage knowledge of the site) to be able to do these on their own.
2. A commitment to developing a **measurable heritage landscape rating system** that will serve both for internal and public accountability.
3. A commitment to **actionable results in terms of heritage landscape maintenance and restoration**, including the development of a heritage landscape recovery and maintenance plan for each lockstation.
4. A commitment to including a **comprehensive viewscape analysis** as part of any landscape study that will include mapping significant cultural lockstation viewscapes, both on the lockstation site itself and to/from the lockstations. The latter is also a UNESCO requirement.
5. A commitment to **recover the significant cultural viewscapes at each lockstation** and to include those in a heritage landscape maintenance plan for each lockstation.
6. Implement **protection of viewscapes impacted by adjacent private land use** by encouraging landowners and municipalities to protect these values through private land stewardship, the implementation of appropriate planning tools such as heritage district designation under the provisions of the Ontario Heritage Act, open space policies, heritage easements and zoning bylaws.
7. **UNESCO WHS requirements** with regards to heritage landscapes along the entire corridor, in addition to at the lockstations, must be specifically addressed (visual character, inappropriate development, etc. See UNESCO section for details).

#### **7.4 Identifying and Protecting Indigenous Landscapes**

Part of the landscape studies should include the identification and documentation of indigenous use of those sites. But it should go beyond just the lockstation to include the entire Rideau Canal. While many original indigenous use sites were flooded by the building of the Rideau Canal, there are a few physical vestiges left of indigenous use such as the long portage around Jones Falls, which was re-purposed by the Royal Engineers as an access route to the site. Such sites on the Rideau should be identified, protected and interpreted.

Parks Canada has access to information in that regard including its own submerged cultural resource inventory for the Rideau Canal and many archaeological reports by the Rideau archaeological community dealing with indigenous use of the waterway. However, the problem with lack of heritage resources applies here, Ontario Waterways presently has no internal expertise to do this, that should be a requirement of a new heritage section. This work should be tied into the work to present indigenous cultural heritage as shown in section 4.6 of this critique.

A new objective under Key Strategy #2 would be:

**Objective: Physical remnants of indigenous use of the Rideau route are documented, protected and presented.**

Target:

By 2025, physical remnants of indigenous use of the route of the canal are documented.

By xxxx, physical remnants of indigenous use of the route of the canal, within the control of Parks Canada, are protected.

By xxxx, physical remnants of indigenous use of the route of the canal are interpreted and presented.

## 8.0 Protecting Ecological Integrity

### 8.1 Legislative & Policy Requirements:

Requirements revolve around ecology integrity in the Parks Canada Agency Act. This includes the requirements "*to maintain ecological and commemorative integrity as a prerequisite to the use of national parks and national historic sites*" and "*to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity*".

**PCA Act, Section 32** (Management Plans): "*a management plan for that national historic site or other protected heritage area in respect of any matter that the Minister deems appropriate, including, but not limited to, commemorative and ecological integrity ...*"

**Commemorative Integrity Statement:** The CIS for the Rideau Canal ties the natural environment to the historic fabric due to the slackwater design of the canal. This is shown in detail in the 2005 management plan. While not as strong as the term ecological integrity, it does show a requirement to protect the natural values of the canal. Of note the CIS is limiting in that it does not recognize that virtually 100% of the canal was flooded, even the pre-canal lakes, such as Big Rideau Lake, have ecosystems created by the slackwater design. The CIS references "drowned lands", but all the shorelines of the Rideau Canal, including those of the pre-canal lakes, are technically drowned lands. Parks Canada's environmental responsibility, based on the CIS alone, is to the entire Rideau waterway.

### Parks Canada Guiding Principles and Operational Policy:

#### *Ecological And Commemorative Integrity*

*Protecting ecological integrity and ensuring commemorative integrity take precedence in acquiring, managing, and administering heritage places and programs. In every application of policy, this guiding principle is paramount. The integrity of natural and cultural heritage is maintained by striving to ensure that management decisions affecting these special places are made on sound cultural resource management and ecosystem-based management practices.*

*It is recognized that these places are not islands, but are part of larger ecosystems and cultural landscapes. Therefore, decision-making must be based on an understanding of surrounding environments and their management.*

There are other federal acts that Parks Canada is responsible for such as the Species at Risk Act and the Impact Assessment Act. Other legislation such as the Canada Waters Act also plays a role.

### 8.2 Foundational Requirements

Ecological integrity is a core requirement at all Parks Canada sites, one that has taken on a more significant role in recent years with greater public awareness of environmental issues, including water quality and wildlife habitat protection. It also relates to sustainable development which contains core principles such as water quality, wildlife habit (above and below the water), addressing climate change, and making sure that what we do now doesn't negatively impact on future generations.

The Rideau Canal is a large and complex waterway, containing a variety of ecosystems. As a federally owned waterway, it is a requirement of the federal government to maintain the environmental health of

all the waters under its jurisdiction. There is also a requirement to work with the public since the maintenance of ecological integrity cannot be done by Parks Canada alone, it requires the co-operation of all the residents who live on the shores of the Rideau Canal.

### **8.3 Synopsis**

There are no objectives in the draft plan that deal specifically with the ecological integrity of the Rideau Canal. Even general natural resource protection objectives, which were detailed in the 2005 management plan, are absent from this plan. So that is a huge omission. Clear objectives with measurable targets, specific to maintaining the ecological integrity of the Rideau Canal, need to be added. There are significant issues that need to be addressed, including a full public description of the jurisdictional and regulatory regime related to ecological integrity – a commitment to engaging and working with public stakeholders – Parks Canada actions related to the maintenance of habitat, including species at risk habitat – a commitment to ecological/environmental data sharing with the public – a commitment to addressing environmental issues related to development – and a commitment to public education regarding the public's role (i.e. waterfront owners) in maintaining the ecological integrity of the Rideau Canal. Many of these existed in the 2005 management plan, based primarily on the CIS statement for the Rideau Canal. Even though most of those commitments have not been done, the 2005 plan shows that there is a requirement for Parks Canada to be doing these.

### **8.4 Detailed Evaluation**

Objective 3.1 is the only section with objectives and targets that deals with ecological integrity. The first two deal with updating the regulatory framework and enforcement, but since these are undefined, it's unclear whether and how those two targets will deal with ecological integrity. Those targets need to be clearly defined, in particular regarding their direct role in maintaining ecological integrity.

The last target in Objective 3.1 is: "A review of in-water and shoreline works policies is completed by 2023 and changes that strengthen the protection of natural and cultural resources are implemented by 2024"

This is a good target but it is **missing a critical component, public input**. The original in-water and shoreline work policies included a round of public consultations. This target should contain a commitment to public input, including the direct involvement with public stakeholders such as Lake Associations. Broad public consultation would also serve to raise the public's awareness of these issues.

To directly address ecological integrity, a **new Objective** containing several targets should be added under Key Strategy #2:

#### **Objective: Maintain the Ecological Integrity of the Rideau Canal**

Targets in this section should include:

1. By xxxx, that the jurisdictional and regulatory regimes related to the environmental health of the Rideau Canal, including detailing the government agencies responsible for each of those, are clearly defined, to a level of full public understanding, and posted on the Rideau Canal website.

2. By xxxx, a commitment for full and meaningful engagement with public stakeholders such as lake associations, with both Parks Canada policy makers (senior managers) and environmental staff specifically tasked with the ecological integrity of the Rideau Canal.
3. By xxxx, a commitment to share scientific data regarding ecological integrity of the Rideau Canal with public stakeholders, including lake associations.
4. By xxxx, a commitment to share other collected data, such as that referenced in section 3.5, “Conservation management actions, such as inventories, research, monitoring and impact analysis, are undertaken on an annual basis” with public stakeholders and also post those results on the Rideau Canal website
5. By xxxx, a commitment to develop actionable environmental protection programs that will support the maintenance of ecological integrity on the Rideau Canal.
6. By xxxx, a commitment to public education to all waterfront owners regarding the role they can and should play in the maintenance of the ecological integrity of the Rideau Canal
7. By xxxx, a commitment to clearly defining the permitting system for any on water and near shore activity, including the roles of other agencies that are part of overall the permitting process.
8. By xxxx, integrate public education with the permitting and enforcement system (soft approach first, then hard approach if no compliance).

In addition, given the long standing involvement with university research regarding the ecology of the Rideau, including the recent excellent research work that has come from a Parks Canada supported NSERC grant, it is strongly recommended that this sort of financial support be continued using a sustainable funding model. Work being done by Queen’s University, the University of Ottawa and Carleton University has greatly increased our knowledge of the ecology and environmental aspects of the Rideau Canal, information needed to be able to properly manage the canal in this era of climate change and every increasing development pressures on the Rideau Canal. Those universities can bring scientific resources to bear on these problems.

So, an additional recommendation is:

By 2021, implement a sustainable funding pool for university research into environmental aspects of the Rideau Canal as they apply to Parks Canada’s mandate.

**UPDATE: Parks Canada Says No to the Ecological Integrity of the Rideau Canal**

Parks Canada, during consultations with a group of Rideau lake associations on March 11, 2021, stated that the requirement for ecological integrity did not apply to the Rideau Canal since it is a National Historic Site. This was a stunning statement given that the Rideau Canal is a federally owned waterway and that Section 32 of the Parks Canada Agency Act clearly states that a management plan for a national historic site must include ecological integrity.

Parks Canada stated in relation to the Parks Canada Agency Act “that section makes a general statement of the varied matters that may be included in a management plan.” That statement from Parks Canada is incorrect; I’ll re-quote the relevant part of Section 32: *“a management plan for that national historic site or other protected heritage area in respect of any matter that the Minister deems appropriate, including, but not limited to, commemorative and ecological integrity ...”* It’s not optional, there is no “may be included” – commemorative and ecological integrity must be included. Other items, in addition to that, may be included, but those two are requirements. The French version of Section 32 is even clearer, stating it’s an obligation to include commemorative and ecological integrity in any management plan.

Parks Canada core principles, shown in its Charter, in its Mandate, in its legislation and in its operational policies are to the commemorative and ecological integrity of all its sites. These two terms are always used together; they form a basis for everything that Parks Canada does. To quote from Parks Canada’s Guiding Principles: *“Protecting ecological integrity and ensuring commemorative integrity take precedence in acquiring, managing, and administering heritage places and programs. In every application of policy, this guiding principle is paramount.”* Note that it’s shown as a single guiding principle, “protecting ecological integrity and ensuring commemorative integrity.” That guiding principle must be applied to all the sites under the control of Parks Canada. Clearly it is intended to be applied as appropriate, but given the vast amount of natural regions (all the waters and wetlands) of the Rideau Canal, ecological integrity clearly must be a core principle of managing the Rideau Canal.

We’ve also been told by Parks Canada that ecological integrity is restricted to national parks as per the Canada National Parks Act, but that’s also incorrect since the new Rouge National Urban Park Act also includes ecological integrity and the Rouge Urban Park has many more similarities to the Rideau Canal than to a National Park. That fact that the Rouge has it clearly shows that the Rideau (and Trent-Severn) should also have it. The definition of ecological integrity for the Rouge is, *“ecological integrity means, with respect to the Park, a condition that is determined to be characteristic of its natural region and likely to persist, including abiotic components and the composition and abundance of native species and biological communities, rates of change and supporting processes.”* The only change needed for the Rideau Canal (and Trent-Severn) is to change “its natural region” to “its natural regions” since the Rideau hosts a variety of ecosystems.

Since the only Parks Canada legislation governing National Historic Sites is the Parks Canada Agency Act and since that act specifically mentions ecological integrity in reference to National Historic Site management plans, it clearly applies. It appears to be another example of Parks Canada, as an Agency, picking and choosing which portions of its legislation it wishes to follow.

If this remains Parks Canada stand on the matter, then it is clearly a gap in the regulatory framework that needs to be fixed. Objective 3.1, Target 1 states: “An analysis of gaps in the current statutory, regulatory and policy framework is completed and needed improvements within the Agency’s control are identified by 2021.” This then in an identified gap, it is clearly within the Agency’s control and it could clearly be easily fixed.

The foundational issue here, outside of the fact that the Parks Canada Agency Act is in fact quite clear on this issue, is that the Rideau Canal is a federally owned waterway with very large natural regions (all of its waters and wetlands). Parks Canada is the sole government organization positioned to take a leadership role in maintaining the ecological integrity of the canal. They have the mandate to it and, in theory, the

internal expertise to be able to do it. It is something they do at other sites they manage, including urban sites, but they've deliberately chosen not to accept their responsibility in that regard for the Rideau Canal.

The question has to be asked, if not Parks Canada, then who? We are in an era of climate change and ecosystems, such as those found on the Rideau Canal, are vulnerable to these changes. The Government of Canada has made a commitment to meet the challenges faced by climate change, yet, here we are on the Rideau Canal, a federally owned waterway with a variety of vulnerable ecosystems, with the federal government saying they will not take leadership in this matter. That's simply wrong on many levels. Parks Canada must step up and assume their responsibility to protecting the waters and ecosystems of the Rideau Canal.

## 9.0 UNESCO World Heritage Site requirements

### 9.1 Legislative Requirements:

World Heritage Convention states that the state party, the Government of Canada, must ensure the "**protection, conservation, presentation and transmission to future generations of the cultural and natural heritage**" of the site "**to the utmost of its own resources.**"

That's pretty clear, key requirements are protection, conservation, presentation, transmission and to support those to the utmost of its own resources. Canada is a rich country, we should be able to properly resource the Rideau Canal to meet all of its World Heritage Site obligations.

Canada's decision to nominate the Rideau Canal a World Heritage Site came with a commitment to meet the UNESCO requirements and to properly resource the site to be able to fully meet those commitments.

### 9.2 UNESCO's Specific Requirements for the Rideau Canal

In addition to its basic requirements for any world heritage site to protect and present the outstanding universal values of the site, ICOMOS in its 2006 evaluation of the Rideau's nomination as a World Heritage Site, included a requirement to also identify and protect the visual setting of the canal. "*ICOMOS however considers that the visual setting of the canal needs clearer definition and appropriate protection to ensure the visual values of the setting are protected alongside the environmental values.*" Of note, the word protection, in the context used by ICOMOS, means legal protection.

The above has not been achieved and, in 2019, due to problems related to this, two inappropriate developments adjacent to the canal, which were inadequately addressed by Parks Canada, led to a severe rebuke to the Government of Canada from UNESCO. In a November 2019 letter concern from UNESCO, it stated that "**the management system for the property does not currently provide adequate protection to the OUV or the setting thereof.**" ICOMOS then made very specific requests, to quote:

ICOMOS therefore advises that the State Party:

- Institute a process of review of the management system, including management plan, and address the legislative position of the property custodian in the decision-making processes regarding spatial planning in the setting of the property.
- The State Party proactively create a dynamic database of tangible and intangible attributes that contribute to the OUV of the Rideau Canal World Heritage property and ensure that the protection of these attributes are embedded in federal and municipal policies.
- Embed procedures in legislative, spatial planning and management systems that mandate full Heritage Impact Assessment following the best intercalation practice for World Heritage properties for all projects that may negatively affect the OUV of the Rideau Canal World Heritage property, considering that attributes may be located both within the property and its buffer zone and in its setting.

### **9.3 Current Status**

The many National Historic Site issues in relation to the lack of public awareness, the lack of public education and problems with the conservation of the heritage fabric, detailed under Sections 1, 2, 3, 4, 6, 7, 10 and 11 of this submission, are also UNESCO World Heritage Site issues. I won't repeat those here. Suffice to say that the presentation of the OUV of the site is essentially non-existent. There are also issues with the conservation of the heritage fabric, including such things as the conversion of a manually operated weir to electric-hydraulic (Old Sly). There are also many issues with the cultural landscapes of the lockstations themselves (see 7.0 Protecting Heritage Landscapes) and also with the built heritage (see 6.0 Protecting Built Heritage).

In addition to the above, the 2006 UNESCO request to identify and protect the visual setting of the canal led to the Rideau Corridor Landscape Strategy (RCLS), a process started in 2009 to meet the UNESCO requirement to identify and protect the visual setting of the canal, which has yet to be achieved, has not been addressed in the draft plan. In early 2013, a flawed consultant's report, that was supposed to identify the visual values of the Rideau Canal, the "Rideau Corridor Landscape Strategy: Landscape Character Assessment & Planning and Management" report, prepared by Dillon Consulting, was released. In June 2013, Parks Canada was provided with an expert critique of that report, detailing the many flaws of the report, including significant errors in mapping. The largest flaw is that the report does not contain precise identification of the visual characteristics of the Canal and their natural, cultural and scenic values, at a scale and substance that would provide defendable policy and legal protection mechanisms such as bylaws that local municipalities could implement.

We now see that report cited in this draft management plan. The goal of the RCLS process, of properly identifying and protecting the visual setting of the canal, remains unresolved. The 2019 ICOMOS request to create a dynamic database of tangible and intangible attributes that contribute to the outstanding universal values of the Rideau Canal World Heritage property and ensure that the protection of these attributes are embedded in federal and municipal policies, speaks to this problem. That very specific 2019 request has also not been addressed by Parks Canada and is not in the draft plan.

Resourcing is a major issue, including the complete lack of interpretive heritage staff on the Rideau Canal and the significant under resourcing of planning capacity. Parks Canada does not have qualified staff that can meet the needs of content creation to meet the UNESCO requirements for the presentation and transmission of the OUV of the site. It has not allocated the planning capacity to meet the basic UNESCO and NHS obligations of the site much less meet the additional 2019 ICOMOS requests. Parks Canada used to have a planner dedicated to the Rideau Canal, now there is a single planner with responsibility for both the Rideau Canal and the Trent-Severn Waterway, two large and highly complex sites. A UNESCO requirement is for the designated site to supply the required human, financial and intellectual resources to fully meet all the requirements of the designation. That requirement is not being met on the Rideau Canal WHS.

#### 9.4 Rideau Corridor Landscape Strategy

There is a misconception about the Rideau Corridor Landscape Strategy (RCLS) fostered by the draft management plan. So it requires some background to properly understand what the RCLS was supposed to be.

I was one of the public members when the Rideau Corridor Landscape Strategy was first set up in 2009, so I am very familiar with the reasons for which it was set up and the goals it was supposed to achieve. The strategy was set up to meet the 2006 UNESCO request: "*ICOMOS however considers that the visual setting of the canal needs clearer definition and appropriate protection to ensure the visual values of the setting are protected alongside the environmental values.*"

Prior to 2009, Parks Canada looked at ways of achieving the UNESCO request, including working directly with the Province of Ontario to achieve the required legal protection. Models looked at included the Niagara Escarpment Commission whose mission is to "conserve the UNESCO-designated Niagara Escarpment Biosphere Reserve as a continuous natural environment and scenic, working countryside."

In the end, Parks Canada decided to do its own project which it termed the "Rideau Corridor Landscape Strategy". The RCLS had two main objectives, 1) to define the visual values of the canal, particularly the areas outside the buffer zone and 2) to implement the legal protection of those visual values.

In 2009, Parks Canada convened a group of government and public representatives to craft an RFP for the initial required study to determine what exactly were the Rideau Canal's visual values. The system set up was a public/government committee, chaired by the Mayor of Merrickville, Doug Struthers. Parks Canada's role, after setting up the RCLS committee, was to provide a secretariat and fund the process.

A few months into the process, due to a complaint from the mayor of a township who had not been included on the committee, a new governance model for the process was proposed. The new model was for an all government main committee, with two advisory subcommittees, a planners technical committee and a public advisory committee. The planners committee was formed, but, in 2011, the main government group voted against forming the public advisory committee. Parks Canada did not object to this.

This new group took the work the public/government committee had done and crafted a new, less robust RFP for a visual values study, at one-third of the budget that had been proposed for the original RFP. The original larger budget was based on what was needed to do a proper study. The new RFP did require that each consulting firm have an outside public expert. In the case of the winning bid, that of Dillon Consulting, their proposed advisor, Herb Stovel, passed away before the project started and was never replaced.

In early 2013, the Dillon consulting report "Rideau Corridor Landscape Strategy: Landscape Character Assessment & Planning and Management," was released. It was highly flawed, including significant errors in landscape character mapping and a failure to identify the visual values of the Canal, at a scale and substance that would allow local municipalities to implement legal protection mechanisms that would be defendable to developer appeals. In June 2013 Parks Canada was provided with an expert critique of the Dillon report pointing out these errors.

The RCLS committee continues to meet, however it has only achieved one substantive accomplishment, a result of the work by their planners subcommittee, that of getting mentions of the RCLS into several official plans. The problem is that those official plans tie it into being an on-going process of actively working to achieve legal protection of the visual values of the Rideau Canal. And as pointed out, the draft management plan is silent on this issue, there are no strategies, objectives or targets regarding the implementation of the RCLS.

The most important objective of the RCLS, the legal protection of the visual values of the Rideau Canal has not been achieved. This is what UNESCO pointed out in their 2019 rebuke of the Government of Canada.

It is now 14 years since Parks Canada was made aware of the UNESCO requirement. It is now time for Parks Canada to take a leadership role in the process. This is also a municipal expectation. A commitment to a renewed and rethought RCLS, with Parks Canada taking a leadership role, should be front and centre in any new management plan.

In the Township of Rideau Lakes Draft Official Plan (2021-02-23) it states that the Township: "Will work with Parks Canada to identify the cultural heritage, natural heritage and scenic features and vistas of the Rideau Canal landscape, and will protect those values through appropriate land use policies and designations, land division policies, cultural and natural heritage policies, design guidelines and view protection policies." Those are very good words, but unless there is a robust Parks Canada led and funded process to tie into, they will remain that way, as just nice words.

The clock is ticking on this. In the 14 years since ICOMOS first asked for protection of the visual setting of the canal there have been ever increasing development pressures along the Rideau Canal, robust protection mechanisms are needed now. The recent examples of inappropriate development proposals for the Château Laurier Hotel in Ottawa and the Rideau Marina re-development in Kingston are just the tips of the icebergs. These types of inappropriate development can, and will, pop up at any time along the Rideau unless protection is put in place. It's to be pointed out that if Parks Canada had a substantive visual character study and well defined policies regarding those, it would have been able to make strong interventions into these types of inappropriate development.

**UPDATE to RCLS** – It was noted during consultations with some planners that Ontario's Provincial Policy Statement was changed in May 2020. The definition of "significant cultural heritage landscapes" was changed from "...determined to have cultural heritage value or interest for the important contribution they make to our understanding of the history of the place, an event, or a people" to a simple reference to the Ontario Heritage Act, a document which does not appear to have any relevance to federal agencies or jurisdictions. This has implications for the RCLS, since much of the visual values are based on cultural heritage landscapes as opposed to protected heritage property (the latter was not changed in the PPS). My understanding is that Parks Canada did not provide any input to the Province regarding this change and the negative implications of that change for the Rideau Canal WHS.

That apparent weakening of the PPS when it comes to the Rideau Canal makes it more important than even for a renewed RCLS, led and resourced by Parks Canada, to come up with protection of the visual character (values) of the Rideau Canal.

## 9.5 Existing (2005) UNESCO World Heritage Site Management Plan

Parks Canada has specifically stated that there will be no new stand-alone WHS management plan as was done in 2005, that this new plan will serve as both the NHS and the WHS management plan. That means that all the items in the 2005 WHS management plan, commitments made to UNESCO, must be addressed in this new plan. Similar to the 2005 NHS plan, there are many sections in the 2005 WHS plan that have been abandoned in recent years (particularly post-2012), significant portions of the 2005 WHS plan are no longer being followed. All of those must be addressed in any new plan, either that Canada (via Parks Canada) has decided not to meet those international obligations or as listed objectives in the new plan showing that it will.

## 9.6 Synopsis of Plan

There are a few references to UNESCO in the document, none substantive and several providing a misleading impression of Parks Canada's heritage management of the Rideau Canal. None address the basic UNESCO requirements for any World Heritage Site to protect, conserve and present the site, exactly the same issues outlined above with commemorative integrity (built heritage, heritage landscapes and public education regarding the reasons for the designation of the site). There are no commitments to the Rideau Corridor Landscape Strategy. In addition, the very specific UNESCO requests of 2019, shown above, are absent in the draft plan.

The absence of anything in the plan to address any of UNESCO's overall requirements is particularly troubling given that Parks Canada, in a letter to UNESCO dated February 5, 2020, stated: "*With respect to ICOMOS's recommendations for updated management planning, I am pleased to confirm that Parks Canada is in the process of renewing the Rideau Canal National Historic Site Management Plan (completed in 1996, updated in 2005, and slated for renewal by December 2020).*" That letter was written by Joëlle Montminy, Vice President Indigenous Affairs and Cultural Heritage, Parks Canada Agency and Head of Canadian Delegation to the World Heritage Committee. Parks Canada assured UNESCO that its concerns would be addressed in the new management plan and yet the plan, released to the public nine (9) months later is completely silent on that issue. That's a significant problem both in terms of the plan and of Canada's relationship with UNESCO.

Parks Canada has also stated that this new NHS plan will also serve as the new WHS plan. That means that all the aspects of WHS management shown in the 2005 WHS plan for the Rideau Canal must be incorporated into this plan. A review of the 2005 WHS management plan shows that many items remain incomplete or were never done. All those elements must be included in this new Rideau Canal NHS & WHS management plan.

## 9.7 Detailed Review

There are several UNESCO references:

Section 2.0 – Significance – reasons for designation are listed. There is an error in that statement that the Rideau Canal WHS is Ontario's only WHS site. It is not. It's the first, but not the only.

Section 3.0 – Planning context contains the highly misleading statement:

As an example, the Rideau Corridor Landscape Strategy (2012) demonstrates Parks Canada’s leadership and recognition towards heritage protection. Developed to guide the multiple jurisdictions along the waterway to address the UNESCO’s recommendations for protection of the canal’s visual values, the Landscape Strategy is the result of collaborative efforts from 13 local municipalities, three counties and many related jurisdictions

This statement is problematic in several ways. As noted above in section 9.4, the Rideau Corridor Landscape Strategy (RCLS) was a process, started in 2009, to address a specific 2006 ICOMOS concern about the lack of legal protection for the visual values of the canal. The 2012 reference is not to the RCLS, it’s to the flawed consultant’s report (the Dillon Report). The RCLS was a process that was supposed to provide the required legal protection of the visual setting of the canal, it not has achieved that goal. The 2019 rebuke by UNESCO to the Government of Canada is directly related to what the RCLS was supposed to, but failed, to achieve, the legal protection of the visual values of the Rideau Canal. Given the many factual errors in that paragraph, it must be removed

Section 3.4 – Living History – under this section the reasons for WHS designation are listed. For clarification, since UNESCO and ICOMOS refer to the Outstanding Universal Value (OUV) of the site, that terminology should be used in either section 2.0 or 3.4, clearly identifying the OUV of the site.

Key Strategy #1 (tourism), Objective 1.3 – “Relationships with Strategic Partners are Developed and Strengthened to Manage the Rideau Canal in a Collaborative Way” This includes direct reference to branding : “with a consistent approach that effectively leverages the Rideau Canal brand and the National Historic Site and UNESCO World Heritage Site designations” and a non-substantive reference to “working with the World Heritage Centre on matters relating to the UNESCO World Heritage Site designation.” Since it’s in the tourism section and not in Section #2, the Protection and Presentation section – the last reference is unclear – presumably issues with WHS branding. Clarification of this section is clearly needed.

The very specific 2019 UNESCO request to: “Institute a process of review of the management system, including management plan, and **address the legislative position of the property custodian in the decision-making processes regarding spatial planning in the setting of the property**” is not in the plan. This also goes to the fundamental need, beyond the UNESCO request, to show the entire jurisdictional regime, with full public clarity, in this draft plan (see Public Clarity & Accountability section). This must be added to the plan.

In addition, the state of the buffer zone is not mentioned. This is a normal part of WHS management plans, this plan should address the buffer zone, its current status and the present state of the legal protection mechanisms in place for the buffer zone along the length of the canal.

Since the many World Heritage Site requirements with regard to heritage protection and presentation are not being met on the Rideau Canal, a new Key Strategy must be added:

### **Key Strategy – Meeting UNESCO World Heritage Site Obligations and Requirements**

Objectives & Actions in this section should include:

1. By xxxx, the Rideau Canal will have a robust public education/interpretation program, supported by sufficient human, financial and intellectual resourcing, to fully meet UNESCO's requirements for the presentation and transmission to future generations of the cultural heritage of the site and to properly foster a public understanding of the Outstanding Universal Values of the site.
2. By 2022, the Rideau Canal will be resourced with sufficient dedicated planning capacity to meet the visual character and OUV protection requirement of UNESCO.
3. By 2022 Parks Canada will take a leadership role in a renewed Rideau Corridor Landscape Strategy and undertake a proper study of the landscape and visual character of the Rideau Canal in partnership with municipalities, other government bodies, and public heritage and environmental stakeholders, to a level of detail that will allow for defendable municipal protection mechanisms to be put in place. The study will also provide recommendations on planning, land management and architectural design guidelines to conserve the heritage character of the canal landscape and its visual values as required by UNESCO.
4. By xxxx, Parks Canada, in a leadership role as part of a renewed Rideau Corridor Landscape Strategy, will work with the Province of Ontario and municipalities to achieve legal protection of the visual values of the Rideau Canal.
5. By xxxx, the Rideau Canal will create a dynamic database of tangible and intangible attributes that contribute to the OUV of the Rideau Canal World Heritage property. [2019 specific UNESCO request]
6. By xxxx, the Rideau Canal will ensure that the protection of these [items in 3 & 4 above] are embedded in federal and municipal policies [2019 specific UNESCO request]
7. By xxxx, the Rideau Canal will embed procedures in legislative, spatial planning and management systems that mandate full Heritage Impact Assessment following the best intercalation practice for World Heritage properties for all projects that may negatively affect the OUV of the Rideau Canal World Heritage property, considering that attributes may be located both within the property and its buffer zone and in its setting [2019 specific UNESCO request]

### **Update**

In a mid-February 2021 consultation with Friends of the Rideau on the draft plan, Parks Canada stated that UNESCO's request were not incorporated into this plan since their request was received too late to be included. However the February 5, 2020 letter to UNESCO from Joëlle Montminy, a VP of Parks Canada, which included "*I am pleased to confirm that Parks Canada is in the process of renewing the Rideau Canal National Historic Site Management Plan*", doesn't support that statement. The draft plan received its first public release in December 2020 which is a 10 month timeline between the letter to UNESCO and a draft plan that doesn't address any of UNESCO's specific requirements. It also doesn't explain the lack of all the other UNESCO WHS requirements in the draft plan.

On March 4, 2021, Director David Britton, in response to a request for an update on how Parks Canada intends to address UNESCO WHS requirements, stated “We base our approach on the Operational Guidelines for the Implementation of the World Heritage Convention which state that the management plan and management system for WH sites need to be relevant and appropriate for each nominated property, and a separate stand-alone WHS management plan is not a requirement. We also understand that UNESCO expects assurances of the effective implementation of a management plan or other management system. We have informed the World Heritage Centre of our NHS management plan review process underway. Once the management plan is complete, we'll be working with our colleagues in Parks Canada's International Affairs Branch to communicate management plan implementation to UNESCO via the Agency's existing management planning and reporting framework, including annual work plans, annual implementation reports, and state of conservation reports.”

If UNESCO were to do a review of Parks Canada's management of the Rideau Canal as a World Heritage Site since it was inscribed in 2007, particularly after the 2012 management change and shift in policy direction on the Rideau Canal, it would find that significant WHS requirement are not in fact being met (see rest of this document for details) and that Parks Canada's reporting mechanisms are non-substantive and inadequate to reflect the reality of Parks Canada's WHS management of the Rideau Canal.

Also, as noted under format, it is clear that just adding UNESCO to this plan will not meet UNESCO's request for a new plan, the format of this plan does not meet UNESCO management plan guidelines. Any new management plan for the Rideau Canal, must, at minimum, fully conform to UNESCO management planning guidelines; it must be an actual management plan.

Parks Canada should already be working on addressing all UNESCO requirements, including meeting all UNESCO management plan guidelines, in a new draft of this management plan.

#### **“Not Our Jurisdiction”**

I'm including this here since I've heard this time and again from Parks Canada, as recently as in a March 11, 2021 video consultation, when the Director of Ontario Waterway pointed out that land ownership and what is done on that land is provincial jurisdiction. Yes it is and we are all well aware of that. That was the major point of discussion when the RCLS committee was formed in 2009 and also a major point as Parks Canada looked at how to the UNESCO requirement to protect the visual values of the Rideau Canal prior to that. But, as UNESCO has pointed out, meeting the requirements of the World Heritage Convention is a federal responsibility; it is up to the State Party (Canada) to figure out how to do it. It's a difficult, but not insurmountable problem.

In addition, the jurisdictional issue in no way precludes Parks Canada from making strong statements with regard of what happens outside of its direct jurisdiction for issues that will negatively impact the World Heritage Site, including negative impacts to the visual setting of the canal. It was this lack of strong intervention that triggered the 2019 UNESCO rebuke. While Parks Canada cannot directly dictate what happens outside of its direct jurisdiction, it can make its position known. Those positions must be backed up by strong written policies and clear statements in the management plan.

Parks Canada has been aware since 2006 of the need to protect the visual values of the canal and is of course very aware of the problem that all of that is provincial jurisdiction, so it must work with the

province to achieve that goal. That is why Parks started off trying to work with the province, including getting World Heritage Sites as a defined protected heritage area added to the Provincial Policy Statement. Unfortunately another section of the PPS dealing with significant cultural heritage landscapes, has been watered down in the most recent version of the PPS – something that Parks Canada unfortunately did not intervene on (see “significant cultural heritage landscapes” in section 9.4 above).

This jurisdictional problem is why there is a strong need, which should be embedded in the new management plan, for a renewal of the RCLS with Parks Canada taking a leadership role. Protecting the visual values of the Rideau Canal is a federal responsibility, Parks Canada cannot simply abrogate that responsibility by using the “not our jurisdiction” excuse.

The goal of achieving legal protection for the visual values of the Rideau Canal is achievable – Parks Canada now needs to build on the work already done, to renew the process, to take a leadership role and to provide the needed resources to meet that goal.

Of note, this was a significant point of discussion during the January 2018 consultations on the scoping document. There were several very good suggestions of how to do an RCLS renewal. It is again worth noting that none of the results of those public consultations showed up in the draft plan.

## 10.0 Providing Heritage Resourcing Capacity

### 10.1 Legislative Requirements:

Parks Canada Agency Act Requirements: the Parks Canada Agency Act states that "*it is in the national interest ... to ensure the commemorative integrity of national historic sites*" and "*to maintain ecological and commemorative integrity as a prerequisite to the use of national parks and national historic sites*" and "*to manage visitor use and tourism to ensure both the maintenance of ecological and commemorative integrity*"

Parks Canada Agency Act:

- *to present that [natural and cultural] heritage through interpretive and educational programs*
- *to carry out Canada's international obligations and agreements* [UNESCO requirements for public education to foster understanding of the OUV of the site]

Ministerial Directive: for Parks Canada to place: "*An emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs.*"

World Heritage Convention states that the state party, the Government of Canada, must ensure the "*protection, conservation, presentation and transmission to future generations of the cultural and natural heritage*" of the site "*to the utmost of its own resources.*"

Parks Canada's Framework for History and Commemoration (2019): "*As a federal cultural institution that is a trusted authority, Parks Canada has an obligation to share and present well researched history, including traditional knowledge and oral traditions, at its heritage places.*"

UNESCO Managing Cultural World Heritage, Resource Manual : "*A heritage management system is a framework, often permanent, made up of three important elements: a legal framework which defines the reasons for its existence, an institution which gives form to its organizational needs and decision-making, and resources (human, financial and intellectual) which are used to make it operative.*"

### 10.2 Foundational Requirements

Detailed heritage knowledge of the site is a foundational requirement for Parks Canada to meet its mandate to foster public understanding of the site, to be able to accurately present the heritage of the site. To maintain the site in a state of commemorative integrity requires the both human resources and also the resourcing to be able to properly present the sites heritage. The main requirements are heritage staff who understand the heritage of the site to a depth that allows the creation of accurate heritage and public education programs that will foster public understanding of why it was designated as a National Historic Site and why it was designated as a UNESCO World Heritage Site.

### 10.3 Current Status

There are currently no qualified heritage staff in Parks Canada in relation to detailed site knowledge of the Rideau Canal and how to present that information to the public. This is clearly evident in recent postings of history to the Rideau website which contained a significant number of factual errors of history. I've

also seen similar errors in CRM evaluations and even the draft plan contains factual errors of history. There are no dedicated cultural heritage staff at all in Ontario Waterways. The Rideau Canal has a Manager of Environmental Services with 8 staff, but there is no Manager of Cultural Heritage Services (and no such services) and no heritage staff. That's an extremely serious resourcing issue for one of Canada's most significant cultural heritage sites, a site with both an NHS and WHS designation based on its cultural values.

The complex history of the Rideau Canal takes years for even a seasoned historian to properly understand. That level of understanding it required to properly present both the NHS and WHS heritage values of the site. As of this writing, there are only two people in the world that I'm aware of with that level of knowledge, a retired Parks Canada historian and myself. I can definitively say that there is no person working for Parks Canada today with that knowledge. Content creation and presentation require that level knowledge. You can't simply read about it and try to repackage that into presentation content, there is lots of evidence, most notably the Rideau Canal website and now in the draft management plan, showing that doesn't work. As Parks Canada itself noted its 2019 Framework for History and Commemoration, "*Parks Canada has an obligation to share and present well researched history ...*"

The heritage values of the Rideau Canal are supposed to be presented to the public using mechanisms such as a robust interpretation and public education programs. These do not exist today. Parks Canada has no resourcing capacity to do it and, despite a clear legislated requirement, has not resourced the Rideau to be able to do it. That was part of the structural change from a Rideau Canal NHS run by a Superintendent to the 2012 change into a combined Waterways unit under a Director. That structural change stripped the Rideau of its heritage resourcing and made tourism and revenue generation as priorities over cultural heritage and ecology. That remains the status today and that status is clearly reflected in the draft plan.

#### **10.4 Synopsis of Plan**

Key Strategy #2 related to this issue. In the preamble it states "The Rideau Canal must find a way to work within its means as resources are finite" – that is the only resource limitation mentioned in the plan, no other section shows a resource limitation. It's a highly misleading statement implying that Parks Canada doesn't have the choice, that it has no resources to provide the Rideau Canal with its needed heritage resourcing. Of course it has the resources, it has simply chosen not to provide those resources to the Rideau Canal. This is a budget choice that Parks Canada made many years ago. It was a decision to make tourism and revenue generation priorities over cultural and ecological integrity. It was a decision on the part of Parks Canada to run the Rideau Canal as a simple recreational waterway.

Parks Canada could easily make a choice to resource a heritage section that would meet their legislated requirements and international obligations, they have simply chosen not to for the Rideau Canal. Some of that could easily be done through a rebalancing of existing resources. However, if Parks Canada wishes to maintain its existing resources, then it will have to add significant new resources to meet all of its cultural heritage obligations.

The choice Parks Canada needs to make now and be reflected in this plan is to operate the Rideau Canal as a cultural heritage site, as they do with some of their other cultural sites (i.e. Fortress of Louisbourg NHS). When Parks Canada was given control of its heritage canals in 1972, it came with a directive for "*a*

*shift in emphasis in the management of the canal systems from "transportation" to historic restoration, preservation and interpretation; natural environment preservation and interpretation and the optimum use of federal lands."*

## 10.5 Detailed Review

A commitment to heritage resourcing, sufficient to meet their national (PCA Act) and International (WHS) requirements, must be included in this plan. It has to be viewed for the long term since there aren't any qualified staff available (people with a heritage background and detailed heritage knowledge specific to the Rideau Canal). The model for how to do that already exists in the history of Parks Canada, its how they did it when they took over the heritage canals in 1972. Parks Canada started with a senior manager of heritage who built up a team skilled in research, heritage content creation and heritage content presentation for its heritage canals. The 20:20 hindsight mistake that was made in that process was making this group HQ (Ottawa) based, those skill sets didn't flow to the field units. When Parks Canada started to "surplus" its heritage staff, starting in the 1990s, it left no heritage capacity at the field level.

Since, even if heritage staff was hired today, it will take years for them to build up sufficient site knowledge to meet commemorative integrity requirements, there must be a commitment for existing staff and new heritage staff to work with the knowledgeable heritage public.

A new Objective is needed under Key Strategy #2 that Parks Canada will resource the Rideau Canal at a sufficient level to fully meet its National Historic Site and UNESCO World Heritage Site obligations.

**Objective:** the Rideau Canal Field Unit will have sufficient heritage resourcing, qualified staff and financial resources, to be able to create and deliver heritage interpretation and public education programs sufficient to meet its NHS commemorative integrity requirements and WHS presentation and transmission to future generations requirements.

Targets in this section should include:

1. By xxxx, the Rideau Canal will have a senior Manager of Heritage\* in place, one tasked with building a heritage team and also tasked with working co-operatively with public heritage stakeholders (meaningful and ongoing engagement) to regain sufficient heritage site knowledge to properly meet its NHS, WHS and CRM obligations.
2. By xxxx, the Rideau Canal organizational structure will be changed to place heritage as a priority in decision making. This means that the heritage manager must answer directly to the Director and/or Associate Director, and other heritage services such as planning and CRM are placed under the heritage manager.
3. By 2021, the planning position will be moved from being under business development to answer directly to the Director of Ontario Waterways. This is a temporary measure until a new integrated heritage section can be developed within Ontario Waterways to deal with all heritage items facing the heritage canals as a first priority in decision making.
4. By xxxx, sufficient resourcing, human, financial and intellectual, will be provided in terms of presentation and public education, to be able to deliver a robust program that meets all of its NHS and WHS requirements.

5. By 2021 Parks will commit to working in close cooperation with the knowledgeable heritage public in all things related to heritage content creation and presentation.

\* I use the term “Manager of Heritage” simply to mean someone senior enough in the management structure to be able to ensure the enforcement of heritage as a priority. It should be a position, similar to the Manager, Environmental Services, who reports to the Director. The planner should report to this new position. CRM requirements should also be a responsibility of this position.

## 11.0 Public Engagement

### 11.1 Legislative Requirements:

Quite simply this deals with the legislated requirements under the Parks Canada Agency Act to maintain the site in a state of commemorative and ecological integrity. Those two items cannot be accomplished on the Rideau Canal without public engagement. From those legislated obligations flow policy related to those requirements.

Parks Canada Guiding Principles, Vision for Parks Canada includes:

- *providing opportunities for the public to get involved; and*
- *working with others to support heritage areas*

*"Stewardship of heritage areas is a shared responsibility. Canadian citizens must be more aware and involved in decision-making and in the delivery of heritage programs."*

Parks Canada Guiding Principles and Operational Policies:

#### Public Involvement

*Public involvement is a cornerstone of policy, planning and management practices to help ensure sound decision-making, build public understanding, and provide opportunities for Canadians to contribute their knowledge, expertise and suggestions.*

UNESCO Managing Cultural World Heritage Resource Manual: There are many references in the manual showing the need for public engagement when managing heritage sites. They note that, in particular for complex sites, the “top down” approach is not the best approach, that there must be “*a more inclusive approach to heritage management and to a greater emphasis on community engagement.*”

### 11.2 What does Public Engagement Mean?

The term Public Engagement in this context means meaningful and on-going engagement with the engaged public including key stakeholders such as myself and NGOs such as heritage organizations and environmental groups (i.e. lake associations). It means engaging directly with the public on matters of policy and management of the site. It means co-operative collaboration on projects that serve to meet Parks Canada’s mandate on the Rideau Canal. It means the direct engagement by senior managers (in charge of policy) and implementers (creation and delivery of programs) being the main points of engagement with the key heritage public stakeholders.

Section 12.0 of the existing (2005) management plan detailed it quite well.

### 11.3 Foundational Requirements

I will list here some of Parks Canada’s own words on the topic:

The 1999 State of Protected Heritage Areas report quite clearly pointed out the need for public engagement for the Rideau Canal: ***"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."***

In 2010, Larry Ostola, then Vice-President of Heritage Conservation and Commemoration at Parks Canada expanded on this, writing (emphasis mine):

*"Greater efforts will also have to be made to engage both local communities as well as communities of interest to make national historic sites focal points for community activity and community life and, ultimately, accessible community resources. Traditionally, staff at many sites have chosen both how and when to engage and involve these communities. At times, they have been largely excluded from site operations and activities and called upon only to participate in a given site initiative on the basis of meeting a particular requirement of Parks Canada's, such as consultation related to management planning. For meaningful engagement of these communities to take place, this must change, and 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."*

The 2008 Parks Canada Guide to Management Planning addressed this issue:

*"The Agency is now moving beyond consultation to more fully engaging and involving Canadians in shaping the vision for managing protected heritage places. This means maintaining an organizational culture that fully embraces internal and external engagement."*

And, as previously noted, Parks Canada Guiding Principles and Operational Policies are quite clear on this issue:

#### **Public Involvement**

*Public involvement is a cornerstone of policy, planning and management practices to help ensure sound decision-making, build public understanding, and provide opportunities for Canadians to contribute their knowledge, expertise and suggestions.*

### **11.4 Current Status**

Ontario Waterways does not do any meaningful and on-going public engagement. It simply doesn't exist. Existing systems make volunteer support for Parks Canada's management of the Rideau Canal very difficult, almost impossible. In most cases, Parks Canada is simply absent; it does no pro-active engagement on issues related to commemorative or ecological integrity.

The only apparent engagement that is done is related to business (revenue to Parks Canada) and tourism development, some of which is actually a threat to the commemorative and ecological integrity of the Rideau Canal, in contravention of the Parks Canada Agency Act.

### **11.5 Synopsis of Plan**

There are no commitments in the draft plan to do any public engagement in relation to either commemorative integrity or ecological integrity. The only reference to engagement is under Key Strategy #1 (the tourism section), where the stakeholder references (undefined) are presumably other government organizations and business people. This is an extremely serious omission in the plan.

## 11.6 Detailed Evaluation

The need for public engagement lies mainly with Key Strategies #2 and #3 – the only sections that deal with commemorative and ecological integrity.

There must be a clear commitment in the plan for public engagement by senior managers (policy, management, resourcing) and by staff working directly on matters affecting commemorative integrity (CRM, interpretation, public education) and ecological integrity (research, inventories, protection and public education activities).

In addition, since we've seen with many examples that ad-hoc public engagement does not work (it's been tried and failed several times), there must be a commitment to formal engagement processes that are on-going and meaningful.

This will require a significant shift in the present corporate culture of Waterways which does not foster public engagement.

A new Objective is required under Key Strategy #2 that **Parks Canada will commit to meaningful and on-going engagement with the public, by senior managers and implementation staff, on all matters relating to commemorative and ecological integrity.**

Targets in this section should include:

- By xxxx, the Rideau Canal will reform the Rideau Canal Advisory Committee as a committee of the Director of Ontario Waterways. The makeup will be no more than 12 members of the public, evenly divided between tourism, cultural heritage and ecology. This committee will meet with the Director at least 4 times a years to discuss matters related to policy and management of the Rideau Canal.
- By xxxx, the Director and/or Associate Director will commit to attending every board meeting of Friends of the Rideau, a Parks Canada partner, one of the original Parks Canada co-operating associations.
- By xxxx, the Director and/or Associate director will commit to seeking a seat on established area committees, such as the Township of Rideau Lakes Lake Association Committee, which has representatives from the two conservation authorities, but no one from Parks Canada.
- By xxxx, Parks Canada will commit to having ecological staff engage directly with lake associations in an on-going and meaningful manner to co-operatively work on issues related to the environmental health and the ecological integrity of Rideau waters.
- By xxxx, Parks Canada will commit to having heritage staff engage directly with heritage associations and engaged heritage stakeholders, in an on-going and meaningful manner, on all matters related to commemorative integrity.

## 12.0 A Shared and Forward Looking Vision

### 12.1 Legislative Requirements:

It's stated in Parks Canada's charter: "**On behalf of the people of Canada, we protect and present nationally significant examples of natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for present and future generations.**" The key here is "the people of Canada." The Rideau Canal belongs to the people of Canada. Any vision of the canal must be a shared vision.

Parks Canada's own vision and guiding principles (from Vision for Parks Canada on the Parks Canada website) are:

**Parks Canada's leadership in the management of protected heritage areas aims at promoting sound principles of stewardship and citizen awareness, and ecological and commemorative integrity. This is done by:**

- **adhering to international conventions such as the World Heritage Convention and the Convention on Biological Diversity;**
- **responsibly managing a system of national heritage areas and programs (e.g., national parks, national historic sites, historic canals, heritage rivers and heritage railway stations);**
- **providing opportunities for the public to get involved; and**
- **working with others to support heritage areas.**

### 12.2 Current Status & Synopsis of Plan

The vision presented in the draft management plan is Parks Canada's old 2012 vision of the canal when it was transformed from separate National Historic sites to a single Ontario Waterways unit, removing heritage and ecology as priorities, replacing them with tourism and revenue generation. It is Parks Canada's vision of its heritage canals being run as simple recreational waterways, as simple tourism sites, just as the Department of Transport used to run the canals back in the 1960s, with the added dimension of revenue generation being done at the expense of heritage and ecology.

It's to be noted that when Parks Canada abandoned significant sections of the the 2005 Management Plan in 2012, they actually wrote a new vision for themselves:

Parks Canada will work in partnership with others to transform the Rideau Canal and Trent-Severn Waterway into world class sites, vibrant and animated, fostering recreation, tourism and economic development, while preserving the natural, historic and cultural environment of these waterways and the adjacent communities.

Compare this statement with section 3.1 ("Vision for the Future") in the 2005 plan, which was a well thought out and shared vision for the Rideau Canal. As with the vision in the draft plan, this 2012 vision was not a shared vision and contains no mention of presentation of the site, nothing about fostering public understanding of the site, and it clearly places a priority of tourism over heritage and ecology. The "work in partnership with others" has not, to this point, included public heritage and ecology stakeholders. They have not been part of Parks Canada's vision for Ontario Waterways.

The vision shown in the draft plan has similar problems. It does not incorporate any of the visioning from the January 2018 public consultations on the scoping document which would have shown a strong emphasis on cultural heritage and ecological integrity. It is not a shared public vision.

The vision in the draft plan is not even a true Parks Canada vision, which, as shown in Parks Canada's own vision statement (12.1 above) would include a commitment to stewardship and citizen awareness and ecological and commemorative integrity of the Rideau Canal. It would include commitments to international conventions, to providing opportunities for the public to get involved and to working with others to support heritage. None of those are happening on the Rideau Canal today and none of those are in the vision shown in the draft plan.

It's not a forward looking vision that would address, up front, the challenges facing a 19<sup>th</sup> century canal in the 21<sup>st</sup> century. A vision that would show Parks Canada meeting the challenge to maintain the authenticity of the canal, to protect and present the core values of the canal, its cultural and ecological integrity. The challenge of getting people to value those attributes that, once lost, can never be recovered.

### **12.3 Detailed Evaluation**

1<sup>st</sup> Paragraph – isn't actually a visioning statement. It doesn't belong here.

2<sup>nd</sup> paragraph – “*Managed by Parks Canada as a premiere heritage waterway and World Heritage Site, the Rideau Canal strives for excellence in the delivery of unforgettable experiences that immerse visitors in the living history and natural beauty it embodies.*” With no interpretation and public education programs, there is very little “living history” and Parks Canada is not managing the Rideau as a heritage waterway, it is managing solely as a recreational waterway. For that statement to remain it needs to be backed up by concrete objectives and targets in the management plan dealing with natural and cultural heritage.

“*where its engineering works, heritage landscapes and historic buildings are well protected and appreciated.*” The infrastructure program exists because Parks Canada was not looking after its engineering works and historic building. The Rideau Canal remains badly undercapitalized which will continue to compound that problem. There are many current problems with its heritage landscapes, they are not well protected, that's not just my opinion, it is also UNESCO's opinion. The draft management plan itself shows that Parks Canada intends to leave up to 30% of its engineering works in poor or very poor condition. That doesn't classify as “well protected.” To be appreciated means to be understood, and with no heritage staff, with no interpretation programs, with no public education programs, there can only be a superficial appreciation, Parks Canada's mandate is to “foster public understanding” – that's not in the vision.

“*Parks Canada has transformed the Rideau Canal into a sustainable historic site through meaningful cooperation with Indigenous partners, collaboration with organizations that share its values,*” As seen under Public Engagement, we have a huge problem on the Rideau with the lack of meaningful collaboration with organizations that share its values with regards to heritage and ecology. That's a significant problem with Parks Canada's present management of the canal. It is not a sustainable historic site, that's one of the greatest challenges facing the Rideau Canal today, and it's not addressed in the management plan.

The rest of the 3<sup>rd</sup> paragraph is not a visioning statement.

*"In the years to come, Parks Canada will continue to work with its partners to elevate the Rideau Canal, both nationally and internationally, into a world-renowned, welcoming and lively site that inspires people to discover and connect with Canada's natural and cultural heritage."* That is a pure tourism statement, partners in this context refers to tourism partners. There is nothing wrong with tourism, we need visitors to the canal, but the core values of the Rideau Canal are its cultural heritage and ecological values, and those must be front and center in any vision statement. They are the both the foundation for tourism and pre-requisites for visitor use of the site. The largest tourism demographic in the world is cultural tourism. It's the cultural heritage values of the canal that draw many to the Rideau Canal. They come to see an authentic canal and are looking for a learning experience. On the Rideau, another huge tourism draw is our waters, the recreational side of the canal, general boating, fishing and other on-water activities. The environmental health of our water and integrity of our ecosystems play a huge role in that. This goes back to the current imbalance of priorities. For that statement to remain, the plan needs strong commitments both in the vision and in the strategies to natural and cultural heritage.

The phrase "*connect with Canada's natural and cultural heritage*" is unsupported by the management plan. This is where interpretation, public education and public awareness of the heritage and ecological values of the site come in. Fine to say it and it is a good visioning goal, but it must be supported by tangible objectives and targets in the plan. They are currently absent in the plan.

### **Where does the vision come from?**

I happen to know where some of this vision comes from, it comes from Scottish Canals, which is not the vision the Rideau Canal should be pursuing. The situation with Scottish Canals is very different than the Rideau Canal. They've lost much of their canal heritage (sections abandoned, sections filled-in) and are now trying to re-establish canals as simple tourism draws. As such, they don't have to worry about authenticity; they've lost most of that. What the current Parks Canada seems to have forgotten is that this was discussed at the first Rideau Canal Symposium in 2001, where the featured speaker was Jim Stirling, Director, British Waterways, Scotland. That included the first views of the Falkirk Wheel which was being built at that time. Discussion afterwards included whether something like that would be appropriate on the Rideau Canal. The answer was clearly no, it was fine for Scotland, since they'd lost authenticity and were just trying to restore canals as economic draws into the region. But the Rideau has authenticity, that's what draws visitors here, it is those values we must protect and present.

In the spring of 2018, at a tourism visioning workshop in Smiths Falls, the Director of Parks Canada Ontario Waterways, invited Richard Millar, Director of Infrastructure, Scottish Canals, to give a live presentation via video. Much talk was about public art and other tourism draws, of "livening up" the canal – words we now see reflected in the draft management plan. This was also a central theme of the Director of Parks Canada Ontario Waterways' talk in that session. So clearly this is model Parks Canada is pursuing, but it's not the model for the Rideau Canal, our vision for the canal should be our own. Our vision must be a forward looking vision, one based on maintaining its cultural heritage and ecological values and providing the people of Canada with an understanding of those values, all significant needs and significant challenges as we move further into the 21<sup>st</sup> century.

**What should be in the vision?**

- 1) **It must be a shared vision:** It must reflect the public consultations. A significant worry is that the visioning done in the January 2018 consultations is completely absent from the vision in this plan. Parks Canada did not incorporate those public consultations on the scoping document into its vision. It must do so, in a meaningful manner, in this round of consultations.
- 2) **It must conform to Parks Canada's own vision:** The concepts in Parks Canada's vision of itself must be incorporated into the vision for the Rideau Canal. That would include statements that it will adhere to the World Heritage Convention, that it will provide opportunities for the public to get involved and that it will work with others to support heritage. It must show a clear commitment to "*fostering and advocating heritage protection and presentation.*" It must "*clearly articulate Parks Canada's leadership role in working with Canadians to support these [heritage] areas.*" Those are direct quotes from Parks Canada's own vision, those concepts must be applied to the Rideau Canal and embedded in any Vision for the canal.
- 3) **It must conform to the requirements of the Parks Canada Agency Act:** It must show, in clear language, a commitment to make cultural heritage and ecology as priorities in decision making and to show a commitment to sufficient resourcing to make that happen.
- 4) **It must conform to Parks Canada Guiding Principles:** Those principles include main themes such as Ecological and Commemorative Integrity, Education and Presentation, Research and Science, Public Involvement, and Accountability. Those should all be addressed in any vision statement, they are absent in the current vision.
- 5) **It must show a forward looking vision with cultural heritage and ecology as priorities:** Maintaining the authenticity, the commemorative integrity, and the ecological integrity of the Rideau Canal in the 2020s is one of the greatest challenges facing Parks Canada as the stewards of this remarkable Canadian heritage site. The title of Key Strategy #3 does show this challenge "Managing a 19<sup>th</sup> Century Canal in the 21<sup>st</sup> Century" – we need a clear vision that incorporates how the values of the canal, its cultural heritage and ecological integrity, will be protected and presented as we move further into the 21<sup>st</sup> century.

## SECTION 2 – Detailed Draft Plan Review

This section is a detailed line by line review of the February 2020 draft plan. The plan contains a great deal of ambiguous wording with soft, unquantifiable targets. It's to be noted that one purpose of the management plan is to provide the general public with clarity in how Parks Canada plans to manage the Rideau Canal over the next 10 years. That required clarity and accountability is absent from this plan.

### Section 1.0 – Introduction

Para 3 states “*... ensures Parks Canada’s accountability to Canadians, outlining how historic site management will achieve measurable results in support of the Agency’s mandate.*” While it is true that this is a requirement of a management plan the significant problem with the draft plan is that it does not provide this required accountability, see “Public Clarity and Accountability” in Section 1 of this review.

Para 5 “*Parks Canada will maintain an open dialogue on the implementation of the management plan, to ensure that it remains relevant and meaningful.*” That dialogue is not defined in the plan. Presently there is no such dialogue and the plan does not include any strategies or targets to achieve it. See “Public Engagement” in Section 1 of this review.

Bottom line is that statements in this section must be supported by key strategies and measurable targets within the management plan.

### Map of the Rideau Canal

Location naming of Clowes and Nicholsons misleading – visually implies that Clowes is east of Nicholsons. Labelling should be switched – Clowes on Left, Nicholsons on right to clarify.

Since the canal is all about the locks and water, additional labelling should be added to include Colonel By Lake, Indian Lake, Mosquito Lake and Loon Lake.

The Tay Canal, which is specifically mentioned in the management plan and is officially part of the Rideau Canal NHS, must be labelled on the map.

### Section 2.0 – Significance of Rideau Canal NHS & Merrickville Blockhouse NHS

“*With considerable foresight, Lieutenant Colonel By advocated for a larger lock system that would accommodate the new steamboats which were beginning to ply the Great Lakes.*” In terms of factual history, that statement is incorrect. Colonel By was looking specifically at the military’s adoption of steamboat technology, not those being used for general commerce. This goes to the military roots of the canal. For accuracy, an easy fix is simply to end the sentence with “the naval steamboats which were beginning to be used by the British military”.

“*Plans were also made to establish fortified lockmaster houses and blockhouses at lock stations.*” That statement is factually incorrect. Plans by Colonel By were for blockhouses, not “fortified” lockmaster’s

houses he planned to have many blockhouses but only got 4 ½ built before he was shut down by the British government. Of note, the term “fortified” is incorrect, lockmaster houses were not fortified. The term for military lockmaster houses (all built post-1837) is “defensible lockmaster houses,” lockmaster houses built of stone with loopholes incorporated into the structure (loopholes are the defensive part). Other lockmaster houses, stone or otherwise, are just “lockmaster houses.” In this case the fix for the sentence is to remove the words “fortified lockmaster houses and”.

It was after the Upper Canada rebellion of 1837 that defensible lockmaster’s houses were introduced. That’s a significant point of Canadian history. So a suggested change in this section is “Plans were made to establish blockhouses at lockstations and four were built, the largest at Merrickville.” Then in the 4<sup>th</sup> para, to maintain chronology, between officially opened (1832) and the Tay Canal (late 1880s) add something like “As a result of the Upper Canada rebellion of 1837, defensible lockmaster’s houses were added at many lockstations to bolster the defence of the Rideau Canal.”

“*... through unsettled wilderness*” is incorrect. I used to think this as well but research shows that the Rideau was in fact a sparsely settled frontier (a phrase I now generally use), there were settlers in place along the length of the Rideau. It’s to be remembered that the entire length of the Rideau route was land granted to loyalists in the late 1700s. While many never occupied their grants, many settlers did arrive and settle prior to 1826.

“flatiron” – not actually a word – should be “flat iron”.

“swing bridges” in reference to 1832. That is incorrect. In 1832 there was a draw bridge, a couple of rolling bridges and couple of fixed high level bridges, there were no swing bridges. Swing bridges came much later. The easy fix is to just remove the word “swing”.

“*Tay Canal connected the town of Perth to the Rideau Canal in 1887*” – also technically incorrect. The Beveridges locks were completed by 1887, but full access into Perth wasn’t achieved until dredging was completed in 1891. It wasn’t until 1890 that the Tay Canal was transferred to the Rideau Canal through an Order in Council and dredging was continuing to create the channel into Perth and to deepen the Perth basin. So 1887 should be changed to 1891.

“*Most recently, in 2007, the Rideau Canal was inscribed as Canada’s 14th and Ontario’s only World Heritage Site.*” This is incorrect since part of the Pimachiowin Aki World Heritage Site is in Ontario. Perhaps change to “Ontario’s first World Heritage Site.”

## Section 3.0 – Planning Context

### 3.1 Geopolitical

3.1 “*winding its way through wilderness, towns and urban centres*” is incorrect. For one, there is no “wilderness” on the Rideau Canal. That word is defined as “a natural environment that has not been significantly modified by human activity.” Given the slackwater design of the canal, and extensive activity including logging and farming on virtually 100% of the land adjacent to and on (islands) the canal for its first 100 years, means there is no wilderness left (hasn’t been for a very long time). The term “natural areas” would be more appropriate. Secondly the low density waterfront development on all the lakes,

which makes up the largest portion of the Rideau Canal, is missing from this statement as are agricultural lands, and hamlets and villages (i.e. Chaffeys, Newboro). A potential fix is “*winding its way through natural areas, agricultural lands, low density waterfront cottage/residential, villages, towns and urban centres.*”

3.1 a reference to the Tay Canal is missing (202 km doesn’t include the Tay). Perhaps, before sentence “The Canal overlaps ...” add something like “In addition, the 10 km Tay Canal, which is administratively part of the Rideau Canal, connects the Town of Perth with the Rideau Canal.”

3.1 – “*three (3) regional tourism organizations*”. Which is the 3rd? There is Ottawa and Kingston. The Rideau Heritage Route Tourism Association which used to cover the area between Ottawa and Kingston is defunct as a separate organization – there is no tourism organization directly looking after tourism in the area between the Ottawa and Kingston. The United Counties of Leeds and Grenville which initially took over is not a tourism organization and does not directly promote Rideau tourism (it promotes business development as opposed to attracting visitors to the Rideau Corridor). As noted in Section 1, the Rideau Canal is fragmented into three Provincial RTOs and that continues to be a problem, the Rideau Canal is not being effectively marketed.

3.1 – “*Parks Canada works closely with each of these authorities to ensure activities adjacent to the Canal, most notably new development, do not negatively impact the Canal’s commemorative integrity and outstanding universal value.*” This statement is misleading at best. A major issue on the Rideau is that Parks Canada has under-resourced the planning capacity of Ontario Waterways with only a single planner responsible for both the Rideau Canal and Trent-Severn Waterway, two large and highly complex systems. So the words “works closely” is incorrect given the realities in the field. The 2019 UNESCO rebuke also goes directly counter to this statement. There is no fix other than to remove the statement.

3.1 – “*As an example, the Rideau Corridor Landscape Strategy (2012) demonstrates Parks Canada’s leadership and recognition towards heritage protection. Developed to guide the multiple jurisdictions along the waterway to address the UNESCO’s recommendations for protection of the canal’s visual values, the Landscape Strategy is the result of collaborative efforts from 13 local municipalities, three counties and many related jurisdictions.*”

That entire statement is both incorrect and highly misleading. The RCLS was a process officially started by Parks Canada in 2009. The flawed Dillon consulting report was released in 2012, which is presumably the 2012 reference, but it was not the Rideau Corridor Landscape Strategy. Parks Canada has an expert critique of that consultant’s report presented to them in 2013 and is well aware of the deficiencies of that report. Parks Canada did not take a leadership role, it took a backseat role as secretariat to the process. The paragraph implies that it has successfully addressed the UNESCO recommendations, when in fact it hasn’t, we have the 2019 UNESCO letter of concern to the Government of Canada that goes directly counter to the statement in 3.1. It’s very troubling to see a clearly misleading statement from Parks Canada given the fact that they have a UNESCO letter clearly stating that they have not in any way met UNESCO’s request to protect the canal’s visual values. See the UNESCO section in Part 1 of this critique for full information.

### 3.2 Socioeconomic

**3.2 Last para** – misleading wording – “*Parks Canada is well placed to bring all these disparate groups together to celebrate, promote and enhance the corridor to become a world-renowned destination.*” While technically correct it implies that Parks Canada presently works to bring these groups together, which is incorrect. So, yes, Parks Canada is well placed to bring those groups together – but it hasn’t been doing that for over a decade now. Parks Canada has been noticeably absent in recent years from many events in the corridor and I’ve not seen any evidence that Parks Canada is doing any work to bring these groups (and I belong to several of those) together.

### 3.3 Indigenous Peoples and the Rideau Canal

Given the political sensitivity of this section, it’s perhaps okay to leave it as is. There are several factual errors in this section (i.e. indigenous people were not part of the construction labour force), but given that history is, to a degree, perceptual, it’s fine if this section reflects an indigenous perception of Rideau history since it’s important that indigenous peoples be able to tell their own stories in their own words. However, if this is a Parks Canada perception of indigenous involvement, then it should be changed to reflect the actual, very interesting indigenous history.

Of note, Parks Canada does not need to use revisionist history, the actual story of indigenous use of the canal route is a fascinating one, one that Parks Canada is not telling due having no focus on this issue and the overall lack of heritage presentation and the lack of research and content creation skill sets within Parks Canada today. Research into such things stopped in the mid-1980s on the Rideau Canal. And for some very significant sites, such as Jones Falls, which has a very long history of indigenous use, heritage research and archaeological work have never been done.

In addition, there is a need to identify and protect some of the last tangible vestiges of indigenous use, such as the portage around the Jones Falls rapids, which was used for thousands of years and re-purposed by the Royal Engineers as one of their main access routes to the site. Parks Canada is not doing this, despite some specific requests by myself to do so. There are also underwater sites and known near/on-shore indigenous sites, including at lockstations (i.e. Newboro). Parks Canada should know these (have them properly documented) and be actively engaged in the protection and presentation of them. A commitment to do that should be in the new management plan.

The statements in this section of the management plan create an impression that there is much more indigenous engagement than is in fact is happening on the Rideau Canal today. This plan should include objectives and targets on the topic of Indigenous Peoples and the Rideau Canal, including a commitment to research indigenous use of the waterway, a commitment incorporating the indigenous story into the overall story of the Rideau Canal and including that information in a robust interpretive and public education program. (see sections 4.6 and 7.4 of this review).

### **3.4 Living History**

I'll start here with the Oxford Dictionary definition of Living History: "*A method of presenting information on history and culture, in which the living conditions, working methods, styles of dress, etc., of past eras are recreated and often re-enacted by performers, typically in a museum setting or as part of an educational programme; frequently attributive as "living history museum", "living history re-enactment", etc.*"

So much of this section has nothing to do with living history (ie. Skateway reference). It appears to be a perceptual misdirection that Parks Canada is fostering a heritage experience for visitors on the Rideau Canal. With a few limited exceptions (i.e. Blacksmith's Shop and Sweeney House at Jones Falls), it does not.

**3.4** "*The survival of a high number of original structures positions the Rideau Canal well to be an international symbol of commemorative integrity and authenticity.*" Misleading since it implies that "original structures" are the sole factors in "commemorative integrity and authenticity." A significant part of commemorative integrity and authenticity are heritage landscapes, many which have significant issues on the Rideau Canal. We are not in fact an "international symbol of commemorative integrity and authenticity" other than perceptual. The word "positions" is correct, we could be an international symbol of commemorative integrity and authenticity, but only if issues with heritage landscapes, the visual values of the Rideau Canal and public education are dealt with.

The authenticity of the canal has been negatively impacted by some of the infrastructure work by Parks Canada in recent years, such as the weir replacement at Jones Falls and replacing manual stop log mechanisms at Old Slys with electric-hydraulic mechanisms. Cultural landscapes in the Rideau Corridor remain under threat from inappropriate development.

**3.4** "*As custodians of this World Heritage Site, Parks Canada is committed to protecting the Outstanding Universal Value for which the Rideau Canal was designated.*" In November 2019, UNESCO stated directly otherwise, "*the management system for the property **does not** currently provide adequate protection to the OUV or the setting thereof*". So, unless the management plan is re-written to fully address all of UNESCO's issues, this statement must be removed since it is currently untrue. I assume this was written prior to UNESCO's Letter of Concern to the Government of Canada, but it does show the perceptual misdirection that Parks Canada has embedded in the draft plan. Parks Canada clearly knows it is not resourcing the Rideau Canal to able to protect the OUV of the site, so that statement, similar to many others, is a less than honest evaluation by Parks Canada of its heritage management of the site. That's a real problem, the management plan, should, at minimum, present a real and honest evaluation of Parks Canada's heritage management of the Rideau Canal.

**3.4** "*Parks Canada works with not-for-profit organizations who operate museums from historic canal buildings including the Bytown Museum, Merrickville Blockhouse Museum, and the Chaffey's Lockmaster's House Museum.*" A misleading statement, "*works with not-for-profit organizations*" implies that Parks Canada has a close working relationship with these groups. This is untrue. As both the Chaffeys Lock and Area Heritage Society (Lockmaster's House Museum) and the Merrickville and District Historical Society (Merrickville Blockhouse) have told me, there is no working relationship at present. Parks Canada, as the landlord of the building, responds to things such as maintenance issues. Since these sites are at lockstations, lock staff are available to help with small issues. That's the real relationship, a landlord –

tenant relationship. In the Merrickville Blockhouse NHS draft plan it states “By 2025, a dialogue is initiated to identify opportunities for collaboration in visitor experiences.” – meaning that dialogue does not exist today. “Works with” implies on-going dialogue with these groups on substantive issues which is not true. So that incorrect statement should be removed.

**3.4** *“The Canal serves as a venue for a range of important events and celebrations, for example, during the winter, the National Capital Commission transforms the canal from Ottawa Locks to Hartwells Locks into the world’s largest outdoor skating rink.”* This has absolutely nothing to do with history, living or otherwise. It simply doesn’t belong here and should be removed.

**3.4** – missing entirely for this section is any mention of heritage presentation or public education – only recreation opportunities are listed. A section about Living History must include Parks Canada’s commitment to presenting that history to all visitors (part of living history is making those visitors aware of the history of the canal). Parks Canada Agency Charter clearly states “we are storytellers, recounting the history of our lands and people.” Parks Canada is not doing this on the Rideau Canal today. There must be a commitment in the plan to do heritage presentation and public education. A commitment to that should be included in this section.

### **3.5 Nature Legacy**

**3.5** – *“The landscape of the corridor is a mosaic of agricultural land, wood lots, forests, wetlands, lakes and rivers, scenic shore-lands and urban settlements.”* Again, as with section 3.1, low density waterfront development, the largest single landscape component and one of the most important on the Rideau in terms of natural impact is missing from this statement. It’s a significant point given the length of Rideau bounded by this type of development. The fix is just to add “low density waterfront cottage/residential” to the listing. “Wood lots” is now out of date, it could be dropped (just leave forests).

**3.5** – *“Conservation management actions, such as inventories, research, monitoring and impact analysis, are undertaken on an annual basis to ensure Rideau Canal effectively protects its biodiversity conservation value.”* The list contains no “actions” it contains “processes”. Inventories, research, monitoring and impact analysis are processes that are supposed to lead to actions. Protection of biodiversity and conservation value only comes through actions on the site. There is no evidence on the Rideau lakes for instance that Parks Canada is taking any conservation management actions. There are none are listed as objectives with targets in this draft plan. See the Ecological Integrity section in Section 1 of this review. It’s a huge problem in this era of climate change. This section needs to be backed up with objectives and targets in the plan.

**3.5 – Species at Risk** – part of the legislated requirement for species at risk is to protect the habitat of those species. Parks Canada does no pro-active work on the Rideau Canal in that regard and they are noticeably absent from the many efforts (by lake associations, NGOs and municipalities) along the corridor to do so.

### **3.6 Operational Realities**

**3.6** “*In the 2019 season, over 61,000 vessels passed through one or more locks.*” That statement is incorrect. In 2019 there were over 61,000 (61,145) **vessel passages**, not vessels. A vessel passage is the count of each passage of a boat through a lock. If I do a day trip from my place to Big Rideau Lake and back, my single (1) vessel generates 8 vessel passages (Davis, Chaffeys, Newboro and Narrows, twice). While I don’t mind perpetuating the myth that the Rideau sees more boats than it really does, in the management plan, the correct vernacular should be used. A statement that “In the 2019 season, there were over 61,000 vessel passages through the locks” would be a correct statement.

**3.6** “*The built assets found across the Rideau waterway, such as locks, dams, weirs, canal walls and bridges, are valued at \$929 million. These assets are integral to the ongoing operations of an enduring, modern and working canal. Parks Canada is also the custodian of other structures, like blockhouses and lockmaster’s houses.*”

That statement is incorrect. It implies that the \$929 doesn’t include non-engineering structures such as blockhouses and lockmaster’s houses, when it in fact does. That number is the total from the 2012 National Asset Review, which included both engineering and non-engineering structures. I think this point of apparent confusion from Ontario Waterways comes from the fact that the infrastructure program only deals with engineering works, not other built heritage. But the 2012 National Asset Review did include lockmaster houses and blockhouses, they are part of the \$929 million number.

It should also be made clear that the \$929 million are 2012, not 2021 dollars. On a straight inflation index calculator, \$929 million in 2012 = \$1.05 billion in 2020.

In addition, given the known costs of the infrastructure work from 2015 to present, and the fact that the 2012 National Asset Review was simply a ballpark estimate, there is presumably a much more accurate asset value (for all built heritage assets on the Rideau Canal) available today. That is the value that should be quoted in a 2021 management plan, not the 2012 estimate. If Parks Canada does not have the current value of all of its built heritage assets on the Rideau Canal, then there needs to be an objective in the plan to obtain that number and keep it current (see section 7 of this review). Also note that a UNESCO requirement is to list the “Condition of Cultural Resources” on the site (see the 2005 WHS management plan). That listing should be included with this plan (a method would be as an ancillary document to this plan).

**3.6** “*The protection and presentation of these engineering works and buildings require sufficient and stable capital investments, ongoing corrective and preventative maintenance, and adequate resources to manage them effectively.*” Just a thumbs up on this one. The Rideau remains severely undercapitalized – several places such as retaining walls at Chaffeys and Poonamalie continue to deteriorate with no work being done to properly fix them. The infrastructure program has dealt with about 80% of the big ticket items, but many of these smaller items remain, making the Rideau look “run down” in several spots. The Rideau Canal needs a sustainable capital budget large enough to maintain all of its heritage structures and other built assets in at least fair to good condition.

**3.6** “*Today, Parks Canada responsibilities for the Rideau Canal include responding to tourism trends, managing economic growth and development responsibly, carrying out enforcement activities, and protecting the natural and cultural resources.*” Missing completely is a commitment to operate the canal

as a heritage waterway – which must include interpretation and public education. And while it is a responsibility, there are no commitments in the management plan to actually manage economic growth and encourage responsible development. There are many example of non-responsible development, particularly in the northern Rideau, but also on many of the lakes, those need to be addressed in the management plan. Parks Canada must take a leadership role in maintaining the cultural and ecological integrity of the Rideau Canal and that should be fully reflected in the new management plan.

## **Section 4.0 – Vision**

Section 12.0 in the main issues of list in this critique deals with the Vision at length, there are a number of incorrect and/or misleading statements and significant parts of a true vision for the Rideau Canal in the 21<sup>st</sup> century are missing. The most critical problem is that it is not a shared vision. The vision fails to address the need for heritage and ecological interpretation and cultural and ecological protection as primary mandates of Parks Canada. The Vision must include strong statements about Parks Canada's role in providing those elements. These should be leading commitments in the Vision. These were main themes during the January 2018 consultation on the scoping document, yet they were not incorporated into the vision in this draft plan.

It also needs to be a forward looking vision, one that directly addresses the challenges of maintaining the authenticity of the canal, of making Canadian aware of the cultural and ecological values of the canal. This is the main challenge for the Rideau Canal in the 21<sup>st</sup> century. Yes, the vision may still include the Rideau as a “world-renowned, welcoming and lively site,” but the foundational base for that is an authentic, well looked after and well interpreted and presented site, those must be front and centre in any vision for the Rideau Canal.

Bottom line is that new Vision must be written, one done to incorporate the collective vision of the public and one that incorporates Parks Canada's own corporate vision (see Section 12.0), and one that is a forward looking vision, directly addressing the challenges of protecting and presenting a 19<sup>th</sup> century canal in the 21<sup>st</sup> century. As noted in Section 12 of this review, the present vision is a 2012 Parks Canada vision for the canal.

## Section 5.0 – Key Strategies

### KEY STRATEGY #1 - REALIZING THE WATERWAY'S FULL POTENTIAL AS A GREAT CANADIAN OUTDOOR DESTINATION

Key strategies are out of order, see Section 1.0, Imbalance of Priorities, for a full discussion of this problem. Parks Canada's legislative requirements require that commemorative and ecological integrity are pre-requisites to visitor use of the site and that's not reflected in this section.

A fundamental problem, related to Parks Canada a whole, is that their Visitor Experience program was developed outside of their heritage and ecological interpretation programs, rather than being integrated with them. This is critical problem that Parks Canada as a whole needs to fix, the significant problems with the present structure of the Visitor Experience Program is not restricted to just the Rideau. We do see directly on the Rideau Canal that Parks Canada's visitor experience program contains no meaningful heritage or ecological interpretation and public education. The resourcing used to develop it does not include the human and intellectual resources required to be able to properly incorporate the required natural and cultural heritage elements.

The other issue, specific to Ontario Waterways and the Rideau Canal is that site "development" decisions are being made by the business development unit with visitor numbers and revenue generation as prime drivers, not commemorative and ecology integrity. That is also detailed in Section 1.0, Imbalance of Priorities.

In addition to a robust heritage interpretation and public education program, there should be a commitment to fully integrating heritage and ecology into the visitor experience program, as key priorities of that program and managed by qualified natural and cultural heritage staff (note that Objective 2.3 does not in any way address this requirement). Parks Canada's mandate and legislation are very clear that commemorative and ecological integrity are pre-requisites to visitor use of any site. So they must be shown as first priorities and any visitor experience program should be thoroughly reviewed by qualified heritage staff (similar to CRM reviews of any capital work).

*"Strategically expanding the Rideau Canal's World Heritage Site image and profile, by connecting visitors with more opportunities to experience its natural and cultural heritage, will enhance its reputation as a relevant and sustainable heritage waterway."* This is a good example of sentence that lacks public clarity with unsubstantive words that carry no real meaning. It should be re-written with public clarity in mind. The main action in the sentence is "connecting visitors with more opportunities ..." but what does Parks Canada mean by that? It could be a simply a reference to getting people to rent a boat and explore the Rideau or it could be direct actions taken by Parks Canada to provide the visitor with those opportunities. Is Parks Canada's role as a facilitator or an implementer? It is also an unsupported statement since there are no objectives and targets in the plan to support those words.

**Key Strategy #1 – Objective 1.1: Visitation Is Diversified through More Opportunities for Authentic Canadian Experiences like Paddling, Camping, Cycling and Hiking**

*“Trip planning tools (e.g. routes, brochures, guides, outfitters) and amenities/facilities (e.g. docks, showers, camping sites) for paddlers, hikers and campers are developed by 2025 in partnership with stakeholders.”*

While the general concept is laudable, it should be pointed out that Rideau Canal Trip planning tools, including information about paddling, camping, cycling and hiking, have existed for the last 25 years on my website, including, for paddling, a highly comprehensive guide, kept up to date and made freely available to the public. But with the latter for instance, Parks Canada doesn't even link to it. So there is some worry about wasting limited resources, particularly at a time when Parks Canada says that it has no resources to do heritage. In the 1990s, Parks Canada also used to do this type of tourism information. It requires a commitment and resources to bring all that information together (it used to be done by a marketing section in the Rideau Canal office with a very healthy budget). It's also to be noted that this type of exercise cannot be a “one off” project – it requires an ongoing commitment to keep the information up to date. That requirement commitment is missing from the Targets.

Camping is a bit of a red flag, given the current push to allocate space at lockstations to land based visitor camping (ie. “equipped” camping). The issue here is to ensure that there is always sufficient space at lockstations to provide for on-demand camping (“boaters camping”), particularly for the paddler who needs this type of on-demand (no reservation) system when doing stretches of, or all of the Rideau. As noted in the initial issues list, national camping initiatives should not be applied to the Rideau Canal, it's not appropriate. An “Authentic Canadian Experience” on the Rideau Canal is an on-water experience – that should be Parks Canada's focus here. There is the caveat that there are limits, since there are environment issues with excess visitation – visitation must be balanced with ecology.

The date of 2025 is too far out, the paddling initiative on the part of Parks Canada started in 2012 with the installation of paddling docks and defined portage routes. This should be a priority initiative to encourage active on-water transportation.

*A visitor offer targeting paddlers locking through the Rideau Canal is developed and implemented by 2023.*

This is very simple to do, there has already been much discussion by Parks Canada in the past on this topic. Initial discussion about promoting paddling on the Rideau Canal centred around discount offerings for all types lock passes (a general paddling discount). This was in fact a proposal put on the table by Parks Canada in 2012/13 (a general paddling discount to encourage active transportation). A proposal later withdrawn. In the end, the least expensive and least useful option was chosen, a 50% discount on a season pass, bringing the cost down to very slightly below the cost of a transit pass.

Parks Canada collects metrics, and a real question is how paddlers use the canal – how many do a straight transit, how many do weekend or week trips, how many portage vs locking through, how many do multiple trips during a season? This was discussed with Associate Director Festerini back in 2016 as needed information to properly position Parks Canada to know exactly who paddlers using the Rideau Canal are, and how to encourage more paddling use of the canal. Presumably that information now exists

(it apparently didn't when I asked as recently as 2018), it should be used to develop a comprehensive paddling strategy, not just a single visitor offer.

Parks Canada should also be doing marketing targeted to paddlers. For instance, is there a brochure or other information in Thousand Islands National Park, which has an overabundance of paddlers, letting them know of the great paddling opportunities next door on the Rideau Canal?

This is also where innovative ideas, such as the Rideau Canal Passport (tied to a reward system), comes in, as a very effective methodology to encourage paddlers (and all boaters) to travel through the locks. Parks Canada should be doing this type of innovative thinking. This again points to the need for public engagement, to put those ideas on the table, to properly discuss them.

### **Key Strategy #1 – Objective 1.2: Land-based Visitation to Lock Stations is Increased and Visitors are More Engaged with the Canal**

*“By 2024, two (2) master plans are developed, in collaboration with key stakeholders, for strategic lock stations (and/or groups of lock stations), that outline priorities for future site improvements to support visitor experience and canal operations. Examples could include Kingston Mills lock station, Jones Falls lock station, or the lock stations within the City of Ottawa. By 2030, an additional three (3) master plans are developed. ”*

Firstly, as previously noted under imbalance of priorities, a “master plan”, which in the context of this section is a tourism/visitor plan, cannot be done until Objective 2.1 (landscape studies) are completed for those sites. The landscape studies, which are supposed to be designed to capture all the commemorative integrity values of the site, are a required prerequisite to any visitor use plan (as per the Parks Canada Agency Act). Those two objectives have to be tied together, Objective 2.1 has to be done prior to Objective 1.2 for any lockstation.

The term “master plan” must be defined. What is a “master plan”? How will Parks Canada serve its legislative and policy mandates within these plans? How will it elevate the Rideau Canal on the world stage? How will they respect the commemorative and ecological integrity of these sites? A full definition of all the elements of a Parks Canada master plan for a lockstation is needed for public clarity and accountability. A previously noted, any “Master Plan” must be subject to the equivalent of a CRM review to ensure that it does not negatively impact on the commemorative integrity of the site.

Parks Canada currently has an excellent blueprint for what should be done at Jones Falls done in 2018 by Don MacKay (now retired), the only person that Parks Canada had with a deep heritage knowledge of the site. Don developed the plan in 2017 and I toured the site that summer with Don, his ideas are excellent and well thought out. I had nothing to add (which in and of itself is a testament to what Don did). His plan included covered all the bases with tourism, cultural heritage, ecological heritage and indigenous components. That's the model that should be followed. Objective 2.1 for Jones Falls still needs to be completed first, but it will confirm the ideas put forward in Don's plan.

It is to be noted that nowhere in this section are objectives to actually implement the plans. That's a serious omission. Plans are easy to create, but plans have to lead to actions on the site itself, a plan isn't a result, the implementation of a plan is. There is no commitment to implementation this in the Draft plan.

*“By 2030, improvements to land-based programs and service offers are implemented (such as heritage accommodation) at five (5) lock stations.”* I’m very worried about this statement. As we’ve seen with the modern upscale interior conversion of the Davis Lockmaster’s House, these conversions are not being done to provide a heritage experience for the visitor or conformable to the heritage character of the building. A true heritage offering can be done without going back to the 19<sup>th</sup> century (ie. Sweeney House), combining modern conveniences with heritage. It’s another tangible example of revenue generation being done at the expense of heritage on the Rideau Canal. Any new conversion must be done with heritage in mind; they must be fully conformable to the heritage character of those buildings.

In addition, there are significant financial resources going this while at the same time Parks Canada has stated (directly in this draft plan) that it cannot resource heritage. This goes back to imbalance of priorities. If “resources are finite” then those finite resources should first be applied to Parks Canada’s legislated priorities, maintaining commemorative and ecological integrity, not to revenue generation.

*“Land-based Visitation to Lock Stations is Increased and Visitors are More Engaged with the Canal.”*

The latter half of the sentence needs definition (what is meant in this context by “engaged with the canal?”). I would want it to mean that visitors would be provided with a learning experience, that engagement would mean an understanding of the role of the canal in the history of Canada, to the story of our nation building. But I suspect that not what is meant here – so, unless defined, what does “more engaged with the canal” mean? That needs to be clarified in the plan, otherwise these are just meaningless words.

A missing target in this section is a commitment to increasing boater use of locks since, as previously noted, land based visitors want to see locks in operation. Full interpretation of the operation of the locks and the heritage of each lockstation is needed to properly engage the visitor with the canal.

Note that this doesn’t have to be done just with marketing to boaters (which is needed), it can be done to take advantage of the large number of existing boaters, to encourage more movement through the canal. Two things were shown in 2017 that were effective in doing this. The Rideau Passport, an initiative of Friends of the Rideau, and implemented by Parks Canada in 2017, was an effective and inexpensive way of encouraging boaters to use locks in all sections of the canal (they were offered a reward for doing this). It can also be used to encourage land based visitation of the entire Rideau Corridor. Friends of the Rideau has, since 2017, tried to get that effective program as a permanent one, to no success. It could easily be tailored for both boaters and land based visitors. It’s an easy, inexpensive and effective method of achieving multiple goals.

The second thing shown in 2017 was the price sensitivity of local boaters. Lockage was free and although a wet year (which dropped numbers during spring and summer), the lockage numbers in the warm and sunny September of that year, which were mostly local boaters, shows that they can be incentivized by pricing. This has been suggested in the past, initiatives such as reduced shoulder season pricing, reduced pricing for residents, free lockage weekends and other methods to encourage the local boating population to use the locks. This “outside the box” thinking needs to be applied to the Rideau Canal, the “one size fits all” model in use by Parks Canada is not the most effective model.

The shoulder season hours, particularly in the fall, should be reconsidered. Rental operators such as Le Boat have clientele that prefer travelling outside the busy summer season. But the restrictive shoulder

season hours, particularly the weekday hours, make travel and itineraries very challenging (I've dealt with many trying to work out itineraries – it's difficult to do with the restrictive fall hours).

The draft plan lacks these more dynamic visions of what can be done. This also goes back to public engagement, since the engaged public, particularly those intimately familiar with the canal, have many good ideas that Parks Canada should be considering.

*"By 2022, a Visitor Experience Strategy is developed for the Rideau Canal."*

As noted under imbalance of priorities, any visitor experience strategy must be subject to a CRM type review to ensure "both the maintenance of ecological and commemorative integrity" as required by the Parks Canada Agency Act for any visitor use of the site. That strategy also needs to incorporate interpretation and public education as a priority. The statement on its own carries no meaning, the plan must define what a "visitor experience strategy" is and how it will meet Parks Canada's legislated requirement to manage visitor use of the site with commemorative and ecological integrity as prerequisites to visitor use of the site. There must also be a commitment to public engagement as part of developing any visitor strategy, an insular Parks Canada strategy will not be as effective as a strategy that incorporates a wide variety of public input. So, at minimum, this statement must include a commitment to work with stakeholders, including public stakeholders.

### **Key Strategy #1 - Objective 1.3: Relationships with Strategic Partners are Developed and Strengthened to Manage the Rideau Canal in a Collaborative Way**

Target: *"Parks Canada meets annually with partners, stakeholders, organizations, local communities and the tourism industry to discuss ongoing management of the Rideau and to explore new initiatives and opportunities for the Canal."*

Target: *"Parks Canada meets annually with key regional and municipal tourism organizations to ensure the Rideau corridor ..."*

Since partners, stakeholders and organizations are undefined, this statement has been very misleading to many who have read it, thinking that it is a reference to public stakeholders and organizations (NGOs), when it is in fact a reference to business and municipal stakeholders.

There is no definition of "collaboration" or "relationships" that involve only a single yearly meeting. For collaboration to exist and relationships developed, engagement must be meaningful and on-going. Collaboration and a relationship with places such as the Township of Rideau Lakes, which could very much use its support in developing economic draws, doesn't presently exist. A target should be to develop these relationships through local and on-going engagement.

Annual meetings are often problematic, unless structured properly. Many don't allow for meaningful and substantive engagement with the stakeholder. Plus they only work if they are used in addition to on-going collaboration.

Missing in this statement is the public component, anything that Parks Canada does involving "partners and stakeholders" must include public stakeholders.

*“working with the World Heritage Centre on matters relating to the UNESCO World Heritage Site designation.”* Given UNESCO’s 2019 concerns and the lack of anything to address those concerns in this plan, I assume this is reference to the WHS branding of the canal, which is presently lacking.

## **KEY STRATEGY #2: DEMONSTRATING EXCELLENCE IN SUSTAINABILITY, PROTECTION AND PRESENTATION**

This is the section that deals with commemorative and ecological integrity – except that objectives and targets related to that are mostly missing from this Key Strategy. Section 1 of this review details those many issues, including suggested new objectives and associated targets. This section does not properly address “sustainability, protection and presentation.”

*“has increased public expectations of Parks Canada to improve visitor experience, levels of service, and heritage and natural conservation.”* Missing from this statement is **presentation**. As a member of the public involved in the World Heritage designation process, I can tell you that there was a huge expectation that presentation (interpretation and public education) would be a significant result of the World Heritage Site designation. It’s a requirement under the World Heritage Convention – so the expectation was that presentation would be significantly boosted, rather than removed.

The Parks Canada Agency Act is also very clear. Parks Canada must foster public understanding of the site and presentation/public education is a key component of Commemorative Integrity.

The most egregious statement is: *“The Rideau Canal must find a way to work within its means as resources are finite.”* This is only statement in the document about finite resources and it falls under “sustainability, protection and presentation”. Outside of the fact that it doesn’t belong in this document and must be removed, it goes directly counter to the 2017 Ministerial directive *“An emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs.”* In addition, the World Heritage Convention states that Canada must meet its WHS obligations, which includes **protection** and **presention**, to **“to the utmost of its own resources.”** We’re a rich country, we should be able to fund our World Heritage Sites so that they meet our obligations to properly protect and present these sites. Clearly the sentence about finite resources must be removed. Section 1 of this critique deals with this issue in detail.

### **Objective 2.1: The Rideau Canal’s Engineering Marvels, Heritage Landscapes, and Natural Beauty Are Protected**

Missing from this Objective is some of the built heritage on the site (i.e. lockmasters houses, blockhouses) which are not “engineering structures” (locks, dams, weirs). A simple fix is to change the term “Engineering Marvels” to “Built Heritage”. This needs to be done anyway since the protection of built heritage is a legislated requirement. If tourism vernacular is to be used, then “Built Heritage Wonders (or Marvels)” could be used, but it is not needed in a Parks Canada management plan.

## Targets

*“By 2030, the cultural landscapes at 5 key lock stations are described and documented to support the commemorative integrity of the waterway as well as visitor experience opportunities that support heritage connections.”* This is both a good and a required initiative, in fact one of the most important initiatives in this entire document. Parks Canada does not presently have proper documentation of its lockstations. As noted previously, this Objective must be completed prior to Objective 1.2 for each lockstation. Missing is the required (and promised by Parks Canada) commitment to public engagement, to involve people such as myself and other local heritage people and organizations in this process.

The history of why this is in the plan should be pointed out. There were four “Landscape evaluations” done in 2015 which rated all the sites they looked as “good” even though Parks Canada doesn’t actually have a landscape rating system. Those studies were cursory and incomplete. I was told later that these were simply high level looks, they weren’t meant to be thorough (although that was not indicated in the write-ups). But, since they ended up on public panels during original open houses for the management plan back in 2016, placed on their website, were also cited in their cursory State of the Site report, and all given ratings (all “good”), the perception was that they were supposed to be actual heritage landscape evaluations (which they aren’t).

Manuel Stevens (former Parks Canada planner for the Eastern Ontario field unit) and myself presented ideas of what an actual lockstation landscape study should look like. At the time, we obtained both a commitment to doing them and that it would involve the participation of local public stakeholders – people such as myself and Manuel Stevens as well as local heritage individuals (i.e. Sue Warren) and organizations (CLAHS, MDHS, etc.). Our skill sets are required as part of this process since Parks Canada currently does not have those heritage skill sets. Thorough landscape evaluations cannot be done without public help.

In addition to just the landscapes, these studies were also to document the stories of those landscapes, their uses of over time going back to indigenous use and through to modern day, to build up a full knowledge base that would then be used to design interpretation and public education programs for those sites.

So this section needs an ancillary document detailing what exactly is planned, what constitutes a cultural landscape study. It also needs a commitment to public participation in the process. And only 5 in 10 years is insufficient, there should be a commitment to doing at least 1 per year – it should be a well resourced, dedicated project. With ever increasing 21<sup>st</sup> century pressures on the Rideau Canal – this type of full evaluation is long overdue.

There must also be a commitment in this section to update the “Statement of Heritage Values” for each of those sites. Those are documents that are being actively used for the CRM evaluations of the Infrastructure Program work. Updating these is actually required for all the lockstations, including the several lockstations for which a “Statement of Heritage Values” has never been done (Hogs Back, Clowes, Kilmarnock, Chaffeys, Davis, Upper Brewers, Lower Brewers, and Beveridges do not have SHVs). Existing SHVs, even the updated ones, are both incomplete and contain errors of fact. These documents are used as a foundational base for CRM evaluations (i.e. infrastructure work). Even the ones that have been “updated” as part of the current infrastructure program are incomplete and contain errors. A

commitment to update existing ones and do one for lockstations that don't have them is a missing target from this section.

*“By 2029, at least 70% of engineering works of national significance are maintained in fair or good condition.”* That statement means that Parks Canada intends to leave upwards of 30% of *engineering works of national significance* in poor or very poor condition (the two ratings below fair). That's not acceptable. It's also limiting. Engineering works are things such as the locks, dams, and weirs. Where do other built heritage assets such as lockmaster houses fit in? This should be a commitment to ALL the built heritage assets on the Rideau Canal. This is missing in the draft plan.

It should also be pointed out that the part of the 2020 Let's Talk Parks Canada consultations was looking at unified legislation to protect all built heritage under federal control. So, on the one hand we have a Canadian legislative initiative to improve protection, and a Parks Canada management plan that is stating that Parks will leave up to 30% of its heritage engineering works in poor or very poor condition and fails to mention the heritage protection of its other built heritage. That's a significant problem in the current draft plan. See section 6.0 of this review for more detail.

### **Objective 2.3: Ecological and Cultural Aspects of the Rideau Canal Are presented to visitors and Integrated in Tourism**

Single Target states:

*“The next Visitor Information Program survey shows an increase in its learning indicator as visitors at the Rideau Canal are educated about the cultural and natural heritage of the Rideau Canal through the use of new and emerging technologies.”*

Targets in this section must include a commitment to have a robust cultural heritage and ecological interpretation program – something not presently being done by Parks Canada today.

The Visitor Information Program survey is not set up to properly capture visitor's learning experience – that needs to be fixed before it's used as a target. The term “learning indicator” must be defined – what exactly is it, how is it measured, how does it qualitatively capture a visitor's learning experience? That's needed for any public clarity and accountability. My present understanding of these is that they are not an actual “learning indicator” that would satisfy commemorative integrity requirements.

*“through the use of new and emerging technologies.”* That line must be removed. Firstly, it's a restrictive statement, all methodologies should be employed, including “old school” signage, physical take always such as brochures, and of course, on-site live interpretation at key sites. It's very easy to get caught up in the shiny bobble of “new and emerging technologies” but these often aren't the most effective form of communicating this information. The backbone of an educational program is content creation, and Parks Canada currently doesn't have that capability in Ontario Waterways. Without qualified staff skilled in heritage content creation and presentation, this is just a non-expert, layperson view of how to deliver culture and natural heritage education. It's not presently being done and there are no skill sets within the current structure of Ontario Waterways to be able to do it.

**Content creation** – Section 10 of this critique deals with the fundamental issue of providing heritage resourcing. It is those skill sets that are the backbone of any kind of education and learning experience and this must be addressed in the management plan. Parks Canada's Framework for History and Commemoration specifically states that "*Parks Canada has an obligation to share and present well researched history.*" – that means the ability to share and present well researched history – an ability that Parks Canada lacks on the Rideau Canal today. UNESCO also has the same requirement, under resourcing it lists human, financial and **intellectual**. It's that latter skill set for heritage that is missing from the current management of the Rideau Canal.

New targets shown in Section 10 of this critique should be incorporated into this section.

Meaningful public engagement with the local heritage community is also crucial to help fill in this heritage knowledge gap within Parks Canada of the Rideau Canal NHS & WHS. This has been detailed under Public Engagement in Section 1 of this review.

It's not just the lack of expertise, it's the will to present this type of accurate and detailed information. This can be seen on the Rideau Canal website today in the Nature and Science section which doesn't have any substantive information on the ecology of the Rideau Canal. Compare this to other Parks Canada sites where this is an extensive section. The Rideau as a waterway and significant regional ecosystem must have the same and the management plan should commit to that. Waterways does have environmental staff, so presumably the knowledge base required to do this does in fact exist, there just has to be the will to present the natural heritage of the Rideau Canal.

### KEY STRATEGY #3: MANAGING A 19th CENTURY CANAL IN THE 21st CENTURY

The overarching issue of this section, how to manage a 19<sup>th</sup> century canal in the 21<sup>st</sup> century, is the main challenge facing Parks Canada today. How to maintain the authenticity, how to create public awareness of the heritage values of the canal, how to maintain the visual character of the canal, all these are significant 21<sup>st</sup> century challenges.

There are some issues with this section, I'll start with the most troubling:

(1) "*Sustainable business development represents an opportunity for the Rideau Canal to generate revenue, off-set costs, and to reinvest in Canal assets and cultural resources, while enhancing visitor services and activities, and conserving and interpreting cultural resources in new, innovative, and exciting ways.*"

Implied in this is the concept that the Rideau Canal's heritage assets and cultural resources, and conserving and interpreting cultural resources, requires revenue generation rather than being core funded by Parks Canada. That's a very dangerous concept. Visitor services, yes, but Parks Canada's priority requirements to commemorative and ecological integrity should be core funded and not have to rely on revenue generation. This is presently a huge problem on the Rideau Canal, revenue generation, has, since 2012, been the main driver of decision making, trumping both commemorative and ecological integrity on the Rideau Canal. Commemorative and ecological integrity are not being core funded (see the resourcing section for details).

Business development is a priority in the management structure of the Rideau Canal, including the fact that the planner answers to business development, a clear conflict of heritage interest. There are also issues with “sustainable business development” since some of the initiatives (i.e conversion of Davis Lockmaster’s House) appear to be overall revenue negative for Parks Canada given the capital costs incurred in the conversion. There also appears to be little CRM oversight of business development. That’s also a significant issue and it’s not addressed in the draft plan.

In addition, the words in that paragraph *“new, innovative, and exciting ways”* are both a restrictive statement (all ways should be done), and a meaningless statement unless defined. What is this referring to? What new, innovative and exciting ways? – examples need to be provided. There are no objectives or targets in the plan dealing with this statement. It appears to be placed simply a perceptual statement, a misleading one given the many issues with conserving and interpreting cultural resources.

(2) Managing a 19th Century Canal In The 21st Century – missing entirely in this section is a substantive commitment to maintain the authenticity of the site, the biggest 21<sup>st</sup> century challenges facing the Rideau Canal (and many other NHSs and WHSs). It’s obliquely referenced but there should be a strong statement here with a commitment to maintaining authenticity, which includes everything from commemorative integrity (in its full form, built heritage, landscapes and public education) to the protection of visual values and heritage character of the canal as a whole, which is a specific UNESCO requirement, and, which as UNESCO pointed out in 2019, the Rideau Canal has failed to achieve.

On the topic of authenticity, everything Parks Canada and other agencies do in term of tourism initiatives and such depend on the **golden eggs** of the goose that is the Rideau Canal. That includes the authenticity of the site, the charm of the visual character, the quality of its waters, and the integrity of its ecosystems just to name four key eggs. These are key to visitation and site use – some of the fundamental reasons visitors are attracted to the Rideau. Whether visitors come for fishing or to have lovely rental boat vacation, those foundational aspect of authenticity of the Rideau Canal needs to be protected. It’s mentioned in passing, but there is no strong paragraph that should deal with this issue in an up-front manner.

Heritage aspects that contribute to the charm and character of the canal, including built heritage and landscapes, once eroded cannot be replaced. The same goes for ecosystems. The old adage, an ounce of prevention is worth a pound of cure directly applies.

### **Objective 3.1: Administrative Tools are Modernized to Comprehensively and Effectively Address the Complexities of an Operational Canal**

**Target** – *“An analysis of gaps in the current statutory, regulatory and policy framework is completed and needed improvements within the Agency’s control are identified by 2021.”*

As noted in Section 8.0 of this review, Protecting Ecological Integrity, a clear gap based on Parks Canada’s present interpretation of the Parks Canada Agency Act, is the lack of the application of the principle of ecological integrity to the Rideau Canal, a federally owned waterway containing large natural regions (all

of our waters and wetlands). This is fully within the Agency's control and it should be clearly identified and dealt with.

**Target** – “*Compliance and enforcement capabilities*” – these need to be defined. What exactly will this new in-house law enforcement capacity actually enforce? Is it just for boating issues such as speed and wake, or will it include enforcement of things such as Parks Canada’s in-water and shoreline works policies? That information is needed in this document to provide public clarity.

**Target** - “*A review of in-water and shoreline works policies ...*” This must include a commitment to work with engaged local citizens and NGOs such as the larger lake associations who are very concerned about these issues. This should be meaningful consultation; local concerns must be addressed in any new policies. Broader public consultation is also needed to address issues that Parks Canada is unaware of, or problems that are created as a by-blow of the policies. So this target must include a commitment to full public consultation as part of the review process. Municipalities should also be given the opportunity to review these policies. This type of review also accomplishes a goal of a broader public awareness of these policies. A robust public consultation program related to these would significantly heighten public awareness that these policies exist.

A real-world example is with the current policies. The planner (now retired) who helped develop them ran into a problem with a policy regarding boathouses that he helped develop. The restrictions on size and shape, which were put in place to avoid the Rideau looking like the Muskokas, meant that only a “garage on the water” could be built. Items such as different roof lines that would add to the aesthetic appeal of a boathouse cannot be done. Many of the charming, beautifully designed boathouses on the Rideau cannot be replicated, due to policy restrictions. In trying to solve a problem (i.e. living quarters in boathouses), they created a new problem. This is an item that should be addressed in the policy review. Parks Canada likely isn’t aware at the moment that this is an issue.

It’s also to be noted that policies in and of themselves does NOT offer protection. Only the enforcement of those policies does. The main issue with the in-water and shoreline work policies is not that they need updating, it is that they need enforcement.

### **Objective 3.2: Sustainable Sources of Revenue Are Developed and Enhanced**

*Targets:*

*By 2025, the implementation of business licencing is expanded to include all commercial operators who use Parks Canada’s lands and facilities or the bed of the Canal in support of their business operations.*

Another real world problem is Parks Canada’s heavy handed approach to licensing and permitting. The phrase “to include all commercial operators ...” is worrying since it shouldn’t be a one size fits all item. Some consideration should be placed on the size of the operation and how the commercial operation serves (or doesn’t serve) the heritage and ecological mandates of Parks Canada. For instance, does Parks Canada want to drive a small boat rental place, or small tour operator out of business? Does a B&B that offers canoe and kayak rentals as part of its offering require a commercial licence for its dock?

I do understand that, similar to reality, Parks Canada’s arms are tied by overarching federal policy. But still, Parks Canada should be sensitive to commercial realities on the Rideau regarding small operations (often very small margins) on the Rideau Canal and how those commercial operations serve its mandate. They should receive a soft co-operative approach rather than a heavy handed regulatory approach. We have

examples from the recent past when boat tour operators were driven off the Rideau due to a heavy handed approach by Parks Canada.

Again, this goes back to priorities. Is commemorative integrity (including public education) a priority, or is revenue generation? As the Draft Plan is currently written, revenue generation has a priority over commemorative and ecological integrity.

### **Objective 3.3: Water Management Decisions Are Made Using a System-Wide Approach Based On Data**

*“A formal communications protocol for communicating Parks Canada water management information to stakeholders is in place by 2022”*

Of note here is that we have many issues on the Rideau with the lack of public clarity in government communications. Public clarity is not at the forefront of present day Parks Canada’s communications.

A real-world example is with the current “Water Management Infonet.” Measurement locations given are to the name of the gauge station, rather than to the water body the levels refer to. For instance, there is a Jones Falls gauge and a Davis Lock gauge. Does Jones Falls refer to the level of Whitefish Lake or Sand Lake? Does Davis refer to the level of Sand Lake or Opinicon Lake? I’ve informed Parks Canada of that public clarity problem four times now, it still hasn’t been changed (a quick and simple job). Most troubling is the fact that Parks Canada does not appear to recognize it as a public clarity issue.

Any “formal communications protocol” must include a commitment to public clarity. Other government departments that deal with the public, such as Revenue Canada, have people specifically tasked to ensure that government communications are clearly understandable to the general public. I don’t think Parks Canada has to go that far, but it is a current issue, Parks Canada needs people skilled in clear public communication.

This is another example where public engagement is critical. Plans for a “formal communications protocol” should undergo a round of public consultation, particularly with NGO groups such as lake associations. This should be included in this target. Since the purpose of the protocol is presumably clear and effective public communication, then the public should be consulted prior to a protocol being put in place. That’s just common sense. A commitment to public review of any new “communications protocol” must be included in the plan.

## Section 7.0 – Summary of Strategic Environmental Assessment

Of note, this section **was not included** in the original release of the Draft Management Plan and I was not made aware of this section until a virtual consultation meeting with Parks Canada and a group of lake association representatives on March 11, 2021. Those sent the original versions of the Draft Plan with this section missing were never notified of this change. This lack of communication on the part of Parks Canada is disappointing. It also goes directly counter to the 4<sup>th</sup> paragraph in this section, to quote:

*Indigenous partners, stakeholders and the public will be consulted on the draft management plan, including a summary of the draft strategic environmental assessment. Feedback will be considered and incorporated into the strategic environmental assessment and management plan as appropriate.*

Since Parks Canada did not inform those sent the initial distribution of the draft management plan, the version that did not include the Strategic Environmental Assessment, they are already in violation of the requirement to consult the public regarding this assessment. Most, such as myself, would assume that the draft plan sent to us in December, was in fact the full draft plan. The plan that we were sent is the plan that most people reviewed, a plan without the late addition of a Section 7.0.

There are several issues that reflect that this is not an honest evaluation of Parks Canada's environmental management of the canal:

*“The management plan will help connect Canadians with nature”* – that statement is untrue. See Section 5.0 of this review, Presenting Natural Heritage, for details.

*“The Management Plan also supports the Federal Sustainable Development Strategy goals of Healthy Coasts and Oceans, and Pristine Lakes and Rivers.”* – misleading at best. Parks Canada's stated position is that their clear mandate to Ecological Integrity does not apply to the Rideau Canal. The draft plan does not contain any strategies and objectives related to the ecological integrity of the Rideau Canal. There are no specific key strategies and objectives related to the environmental health of the lakes and rivers that make up the Rideau Canal. Parks Canada's lack of public engagement with those working on the environmental health of the Rideau Canal, such as lake associations and public environmental groups, goes counter to sustainable development objectives. See Section 8, Protecting Ecological Integrity.

*“The development of new land-based programs and service offers at strategic lock stations; and development of new amenities and facilities for paddlers, hikers, and campers.”* – the imbalance of priorities in the draft plan, which places visitor services and revenue generation ahead of ecological integrity (which, as noted, isn't even included in the plan), makes this statement problematic. See Section 1.0, Imbalance of Priorities, of this review for details.

*“Indigenous partners, stakeholders and the public will be consulted on the draft management plan, including a summary of the draft strategic environmental assessment. Feedback will be considered and incorporated into the strategic environmental assessment and management plan as appropriate.”* As noted at the beginning of this section, Parks Canada has already failed to meet this commitment.

## CONCLUSIONS

### Need for a significant re-write and public consultations on a Draft 2

This draft plan has so many substantive issues, that a major re-write of the plan is required. As written, this is a 2012 plan, reflecting the internal decisions (no public consultation) that Parks Canada made in 2010-11 in changing the management structure of the Rideau Canal NHS (the merger of management into a single Ontario Waterways unit), with a sole focus on tourism and revenue generation. It does not reflect how the Canal should be run in the 2020s, in an era of climate change and ever increasing development threats to the authenticity of the site.

Very worrying as well is the fact that the many cultural heritage and ecological issues brought up in the detailed roundtable consultations done on the scoping document in January 2018, were not included in this plan. Those were the main topics/recommendations in the first two roundtable sessions. The fact that Parks Canada held public consultations, but didn't incorporate the results of those into this plan, means there is no public trust that these consultations will be any different. It's to be noted that the Mountain Parks have done a 2 stage process, producing a "What We Heard" from their first round of consultations so that the draft plan for each park can be measured against the public consultations that were held. We got no such "What We Heard" from those (January 2018) on the Rideau Canal.

UNESCO World Heritage Site requirements are completely absent in the plan. Parks Canada has stated that this will also serve as the new WHS management plan, so all the WHS management requirements, including those specifically requested by UNESCO in 2019, must be included in a new draft of the plan and be made available for public review.

To show that Parks Canada will in fact create a management plan for the Rideau Canal that reflects significant public expectations, ones that are also clear legislated requirements of Parks Canada, a Draft 2 of the plan must be prepared that incorporates all the issues brought up during this round of consultations and be made available for meaningful public review prior to a final plan being prepared for the Minister. That final plan must fully reflect public engagement results as well as fully incorporating all UNESCO WHS requirements.

In addition, as noted in the review of Section 7.0, Summary of Strategic Environmental Assessment, of the Draft Plan, since this section was not part of the initial distribution of the Draft Plan in December, and since Parks Canada did not send those groups the final version of the Draft Plan that included the Summary of Strategic Environmental Assessment, Parks Canada is in violation of the requirement to consult the public on this section. It is yet another reason that a Draft 2 must be made available for a formal public review.

**UPDATE (March 18):** Director Britton, after first agreeing (Feb 16, video consultation with Friends of the Rideau) that a significant re-write was needed, based on the imbalance of priorities and the complete lack of UNESCO WHS management issues in the current plan, and alluding that groups such as Friends of the Rideau would be able to review a Draft 2, backed off on that at a later session (March 11) with the Lake Associations' Group. To quote Director Britton, "We will be producing a "What we Heard" document from these consultations and sharing it with you in advance of any follow-up conversation we have later

in the spring, as the foundation for that discussion. I expect that that this document will contain an overview of the full spectrum of what we hear from stakeholders during the consultation.”

There really is no purpose to having discussions of a “What We Heard” document – the only thing that matters is what of that ends up in the plan that the Minister of Environment and Climate Change signs off on and how that is applied to the real world management of the Rideau Canal. What would have been productive is to have a “What We Heard” from the January 2018 consultations and to able to use that as a measure of what from that ended up in the plan. Unlike the Mountain Parks, we didn’t get that for the Rideau Canal, and now, according to the Director, we will not be allowed to see a Draft 2, which must be a substantial re-write of the plan.

So the request remains, that, given the large number of substantive issues with the current plan, there must be a formal opportunity for a Draft 2 to be properly reviewed by the public prior to a version being finalized for the Minister. The current direction Parks Canada is taking is of a pro-forma process, that they plan to write the “management plan” they internally wish to write, ignoring informed public input and ignoring the many failings when it comes to the requirements of a proper protected site management plan (see Public Trust in the listing of issues).

The bottom line is that the public has a right, and Parks Canada has an obligation, to provide a full public review of the Rideau Canal Management Plan that will be substantively what is presented to the Minister and tabled in Parliament. Since this draft plan clearly isn’t that plan and that substantive changes will have to be made, Parks Canada must provide the opportunity for a meaningful public review of the plan that Parks Canada will be submitting to the Minister.

### **Need for a Forward Looking Plan**

A significant problem is that this is not a forward looking plan, it reflects the Rideau Canal going back to the Department of Transport era of the 1960s. It is not a plan that addresses the significant challenge of maintaining the authenticity of the canal. It does not address the equally significant challenges of making Canadians aware of the cultural and ecological values of the canal, for residents, visitors and Canadians in general to value the Rideau Canal as more than a simple recreational waterway. It does not address the ecological integrity of the Rideau Canal, under threat by ever increasing development pressures and the negative impacts on the lakes and rivers of the canal due to climate change. These are direct responsibilities of Parks Canada and are needed now, more than ever, with the ever increasing pressures put on the canal in the 21<sup>st</sup> century.

### **Need for an actual Management Plan**

The comments in this document are based on the current format of the plan. But there are significant issues with the stripped down format itself, basically that it is not an actual management plan. The Rideau Canal needs a management plan that covers off all the requirements of a heritage site management plan (international guidelines). Former (retired), Parks Canada Rideau planner, Mr. Manuel Stevens, has provided a submission dealing directly with this topic. I have appended the UNESCO appendix with their guidelines in outline form just to show this point. The Rideau Canal needs an actual

management plan that will fully address the complexities of the site and provide for full public clarity and accountability.

It's of course not just the Rideau Canal, Parks Canada as a whole must return to actually creating management plans that are management plans. The current format appears to be designed as the minimum to achieve a bureaucratic exercise of creating a plan (a legislated requirement). But Parks Canada does put a lot of resources into creating one. That effort should go into creating a true management plan, one that actually clearly details the site management, including its natural and cultural heritage, otherwise it's just a very expensive bureaucratic exercise.

### **Need to Follow A Management Plan**

As has been made very clear on the Rideau Canal, Parks Canada does not follow its own management plans and has no mechanisms in place to ensure that they do, or, when a significant change in policy is applied to a site (i.e. Rideau Canal in 2012), that a pre-requisite is a new management plan with a full round of public consultations. At the moment we're being asked to rubber stamp what is essentially the plan that Parks Canada would have written in 2011 as they were planning the massive organizational change to Waterways. Public comments at that time would be very similar to what Parks is now getting, ten years later, in 2021.

There are no meaningful internal accountability methods. The most recent State of the Site report and the only (2017), "Evaluation of the Implementation of the 2005 Management Plan" are incomplete and neither were an honest evaluation of the actual implementation of the 2005 management plan to the site. Similar to the work on this plan, they appear to be a simple bureaucratic exercise to say that a review was done. Since the many "incomplete" and "ongoing" status listings in the 2005 plan evaluation have not been carried over into this plan, it shows that the 2017 evaluation was simply done as a bureaucratic exercise to do an evaluation.

While it is implied in Parks Canada Agency Act that Parks Canada will actually follow its management plan, or, if not, create a new plan to reflect a change in management, Parks Canada does not in fact do this. It means that there is no internal accountability; Parks Canada does not take its management plans, or ensuring the accountability of a plan, seriously.

The fact that Parks Canada does not hold itself accountable means that external accountability is needed. In the current governance, this would be by the federal department of Environment and Climate Change Canada. But, in addition, it points to the need for a significant change to legislation requiring Parks Canada to actually follow its management plans.

### **UNESCO Requirements**

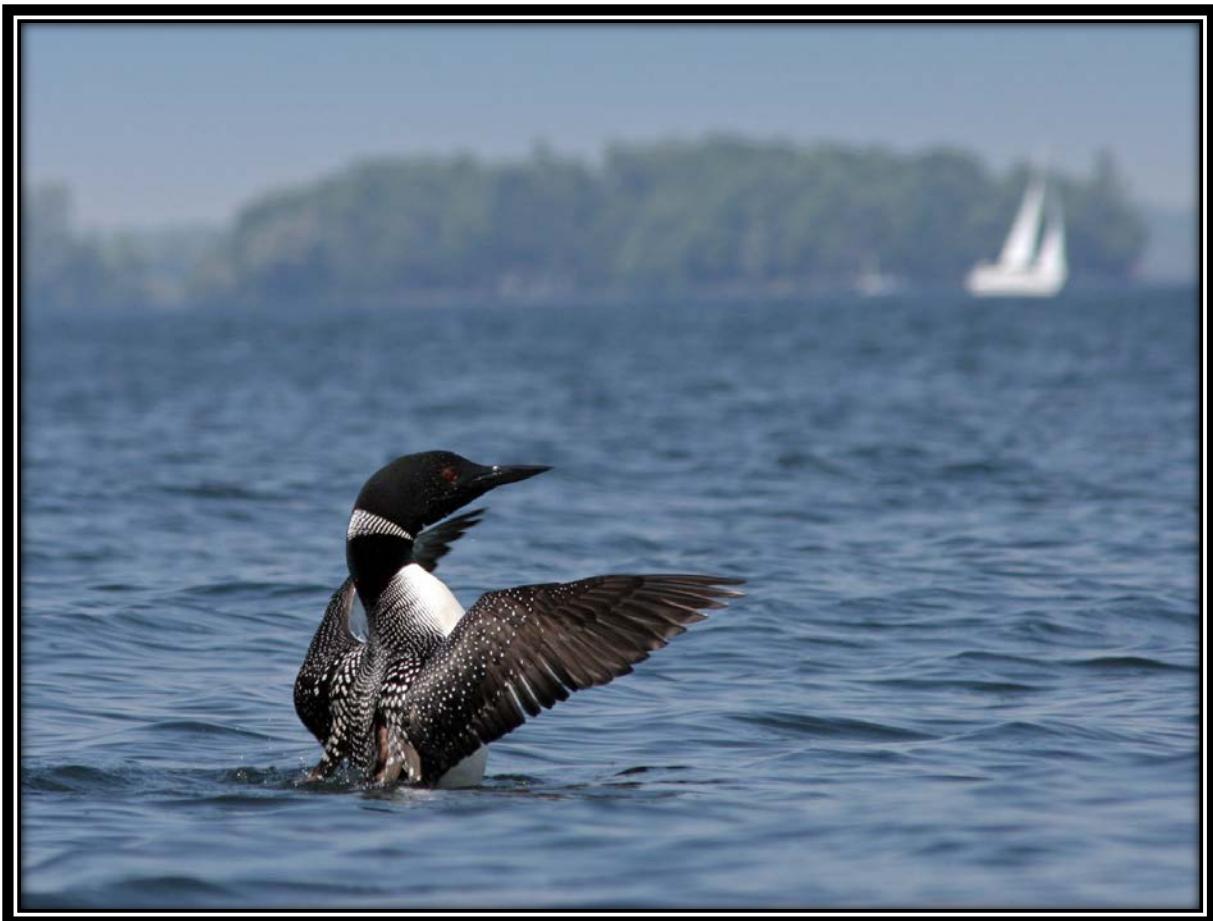
This plan format and contents will not be acceptable to UNESCO, it does not meet key requirements of their management plan guidelines. In November 2019 UNESCO specifically asked for a new management plan. The existing 2005 WHS management plan is long out of date and a brand new plan is needed. But this format of plan, even with the addition of a UNESCO section, can't be it. UNESCO demands much more, including transparent accountability and implementation details.

Given that UNESCO asked the Government of Canada for a new management plan 16 months ago (as of this writing), the question is how will Parks Canada deal with it? A rebuke from UNESCO is rare, it is a black eye for Canada that Parks Canada received one for the Rideau Canal. The fix now is to address their concerns in a substantive manner, both in terms of actions in the field and of a clear plan that addresses all of the Government of Canada's obligations to the World Heritage Convention and UNESCO requirements as part of the World Heritage Site designation.

It's also very worrying that, in terms of Parks Canada's relationship with UNESCO, Parks Canada is being less than honest with UNESCO regarding their heritage management of the site. For instance, if we look at the timelines of UNESCO's recent Letter of Concern we see a major problem. UNESCO's letter to the Government of Canada, dated 4 November 2019, was responded to in a letter from Parks Canada dated 5 February 2020. In that letter it was stated "*With respect to ICOMOS's recommendations for updated management planning, I am pleased to confirm that Parks Canada is in the process of renewing the Rideau Canal National Historic Site Management Plan (completed in 1996, updated in 2005, and slated for renewal by December 2020).*" Yet, the draft plan, released to the public 10 months later in December 2020, is completely silent on World Heritage Site issues, including UNESCO's very specific concerns and requests. COVID notwithstanding, Parks Canada has had plenty of time to address UNESCO's issues and the public has a right to see how they plan to address those concerns in the new management plan. The draft plan is dated February 2020 meaning Parks Canada sat on it for almost 10 months and did nothing to add UNESCO's concerns and other WHS elements into the plan prior to public release.

Director Britton has recently stated with regards to a WHS management plan "we base our approach on the Operational Guidelines for the Implementation of the World Heritage Convention which state that the management plan and management system for WH sites need to be relevant and appropriate for each nominated property, and a separate stand-alone WHS management plan is not a requirement." That means that this draft management plan, a plan that is presently completely silent on UNESCO issues, is to be the new WHS plan for the Rideau Canal. Adding the World Heritage Site elements along with UNESCO's specific requests will require very significant changes to the draft plan. Those changes will not, according to Parks Canada, be available for public review. A UNESCO requirement is for the site managers to engage with local citizenry in the management of the site, including in the creation of a management plan. This was done for the 2005 WHS plan, but Parks Canada now clearly says it will not be done for the 2021 plan.

The complete lack of WHS information is another reason that a Draft 2 of the plan, incorporating all the WHS requirements, must be released for a formal public review.



**Loon on Big Rideau Lake, Rideau Canal**

The Rideau Canal, built as a slackwater canal system, consists of less than 10% of what people would think of as a canal (a ditch). In addition to its many cultural heritage elements, it also has significant natural heritage elements, including large lakes such as Big Rideau Lake. The protection and presentation of both its cultural and natural heritage values are responsibilities of Parks Canada.

# **APPENDIX A – UNESCO Management Plan Guidelines**

UNESCO – MANAGING CULTURAL HERITAGE

World Heritage Resource Manual

Appendix A: A framework for developing, implementing and monitoring a management plan

Section Appendix A1: Introduction: management plans within management systems

# Appendix A

## A framework for developing, implementing and monitoring a management plan

Appendix A expands the discussion of the ‘planning’ process in Part 4.3. Its purpose is to provide help for developing the management plan that is required under Section 5 of the World Heritage nomination format. Management planning is an increasingly popular tool for protecting cultural values and, in particular, Outstanding Universal Value within the World Heritage process. Preparing and implementing a management plan requires contributions from all nine components of a heritage management system (see Part 4) and is an opportunity to document in a structured way the management system(s) at a property. It also helps to identify any gaps in the existing system which, in turn, provides feedback to change or improve it. This information is also needed for Sections 3.1 e, 4.5, and 6 of the nomination format.

The Appendix is organized under the following headings:

- A.1 Introduction: management plans within management systems
- A.2 The management planning process
- A.3 Contents of the management plan.

### **A.1 Introduction: management plans within management systems**

#### **Management planning: an overview**

‘Management planning’ has undoubtedly become one of the most familiar tools within the World Heritage system. States Parties, members of the World Heritage Committee and the Advisory Bodies use management planning as the tool to evaluate the State Party’s commitment to maintain the OUV of a given property and also guarantee that the benefits are delivered to society. The term ‘management plan’ is used more frequently and emphasizes the planning outputs of the tool instead of the management approach and process that it constitutes.

Management planning and the management plans that it produces should, however, be understood in relation to the host management system(s) as described and elaborated in Part 4 (see also pp. 89-91 of the *Nomination Manual*). A management plan should be a reflection of the entire management system. As a tool that documents the overall management system, it constitutes an opportunity to describe and assess a given management system, and thus can demonstrate how the State Party is going to maintain the OUV of a property.

In the case of World Heritage, protecting the attributes that reflect OUV will be a primary objective but cannot be the sole one. As described below in the ‘management planning process’, a management plan will address the overall cultural values of a property and the changes in the immediate vicinity of the property that might have an impact on them. This inclusive approach is one of the qualities of the management planning approach since it requires links with other plans (such as local or regional land use planning or development plans) and stakeholders outside the heritage system.

Management planning beyond the physical confines of the property aims to better protect the OUV and other cultural values, and to secure those benefits to society that heritage can offer and that the property can gain from greater community involvement (see Part 2.3 on sustainable development).

## GOOD TIPS

- The preparation of a management plan is closely linked to the preparation of a nomination dossier. Once OUV has been established, it would be a good idea to start assessing the management systems in relation to Section 5 of the nomination format (OG Annex 5) and to start the process outlined below. Sections 4, 5 and 6 of the format (OG Annex 5) should be completed, using the information gathered for the management plan.

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) at a cultural heritage property and needs to be periodically reviewed and renewed.

## CASE STUDY

### **Management plan as an integral part of the management system**

*The primary management system of Vizcaya Bridge operates at provincial level. It is legally protected by the Basque Government (a provincial government in Spain). The body legally responsible for the direct protection and management of Vizcaya Bridge is Bizkaia Provincial Council: the provincial authority responsible for the Province of Bizkaia in which the bridge is located. Required resources are also generated or provided by the same institutions. A commission for the conservation of the monuments has been established to bring all relevant stakeholders and a management plan has been elaborated. This is also an interesting example of outsourcing of ordinary management and maintenance to a private company. It is also an example of a single industrial heritage monument being managed to contribute to a broader attempt to develop the entire city of Bilbao in a different direction as its heavy industrial past came to an end.*



© UNESCO

Vizcaya Bridge (Spain)

# Appendix A

## Management plan

A management plan is a relatively new tool which determines and establishes the appropriate strategy, objectives, actions and implementation structures to manage and, where appropriate, develop cultural heritage in an effective and sustainable way so that its values are retained for present and future use and appreciation. It balances and coordinates the cultural heritage needs with the needs of the ‘users’ of the heritage and the responsible governmental and/or private/community bodies.

The context and nature of a management plan vary considerably, depending on the type of property. For example, a management plan for an archaeological site or an urban centre would be more complex than that for a single building. The management plan will also depend on the character of its primary management system. The plan will specify how the OUV (or potential OUV in the case of a nomination) will be sustained through protection and conservation and demonstrate practically effective measures for achieving on-ground conservation outcomes.

As explained before, producing a management plan is the result of a collective and participatory approach, and provides:

- In the case of World Heritage, an official commitment to further the obligations of the World Heritage Convention;
- Opportunities for all stakeholders,<sup>84</sup> especially property owners and managers, to be involved and have a shared understanding of the property, leading to strong support for the plan;
- A clear description of the property as the basis for assessment of its values, particularly its OUV;
- A transparent description of how the existing system functions and how it can be improved;
- A Statement of OUV of the cultural property, as agreed by or proposed to the World Heritage Committee, identifying attributes to be managed and the conditions of authenticity and integrity that need to be maintained;
- An assessment of the other values of the property since these will need to be taken into account in its management;
- An overview of the current condition of the property and various factors that may have positive or negative effects on attributes, authenticity and integrity;
- A collective vision for the management of the property (e.g., where it should be in the next 20-30 years);
- A range of management policies and/or objectives to achieve the vision, over a period of usually about five years;
- A series of actions (for conservation, interpretation and presentation, contributions to society, etc.);
- An implementation strategy, including monitoring and review;
- Integration as necessary of multiple plans or systems, or ensuring that they are complementary;
- Heritage benefits to society which in turn secure benefits for the property (enhancing all values, securing new forms of community support).

A management plan can:

- Describe the overall management system for the property;
- Provide a structure for analysis of complex processes;

84. In this context, stakeholders may include local people, indigenous peoples, property owners and managers, government at all levels, commercial interests including tourism, and NGOs.

- Provide a framework to make informed decisions and to manage change;
- Provide guiding principles for coordination of activities / responsibilities on the site;
- Help to manage collaboration among different interest groups in the public and private sectors;
- Ensure that interventions are thoughtfully designed to protect OUV and other values as far as they are compatible with protecting OUV;
- Help to rationalize existing resources and facilitate funding.

The plan should also reflect:

- Participation by key stakeholders and the wider community from the time of the preparation of the nomination, a shared understanding of the concept of World Heritage and of the implications of listing for property management;
- A shared understanding of the current management system (the legal and regulatory framework, management structures and approaches), development plans and policies, as well as land uses which currently exist at the property;
- A shared understanding among stakeholders of the OUV of the heritage property, the conditions of authenticity and integrity, and the factors affecting the property;
- Shared responsibility and support among all stakeholders for the management approaches and actions required to maintain the property's OUV;
- An inclusive approach to planning, sharing the task between all relevant authorities and stakeholders to draw up a feasible framework for decision-making that will ensure the sustainable management of the property into the future;
- Management structures are in place to implement the plan and a readiness and the capacity to achieve the management actions required. In this way the plan is a 'means to an end' (and not an end in itself which can be a danger in the planning process).

Its contents must:

- Focus on protecting the OUV of the property while responding to management issues of local relevance;
- Provide baseline information on the state of conservation of the property, including an adequate description of it;
- Describe the management system: legislation and regulatory and policy protection measures, management structures and practices at the property (those actually in force, not only those applicable in principle);
- Be accessible and easily understood by all stakeholders, avoiding excessive use of jargon;
- Present a vision and long-term goals for the World Heritage site and actions required to achieve these goals;
- Outline the status of the management plan in relation to other plans (development / conservation) in force at the property;
- Be useful for the purposes of education and sustainable development;
- Take risk management into account;
- Be strategic in its approach: make use of lessons learned from past actions to anticipate the direction of management into the future;
- Describe how the plan and management system will be implemented, monitored and reviewed;
- Outline the final plan and its expected achievements directly linked to the resource.

Producing a management plan involves two complementary tasks; the process (planning and development) and the contents (outputs and outcomes - the plan as a management tool).

# Appendix A

## CASE STUDY

### **Purpose of a management plan**

The objective of the management plan for the 17th-century canal ring area of Amsterdam within the Singelgracht

*The management plan describes how the parties with governmental responsibility are to preserve the unique cultural and historical value of Amsterdam's 17th-century ring of canals within the Singelgracht as World Heritage.*

*The management plan is a guideline for the conservation and management of the property – the 17th-century ring of canals and the buffer zone within the*

*Singelgracht designated for its protection. The plan combines the policy of the various responsible parties to create a single shared vision on the long-term management of the intended World Heritage site. The shared vision and agreements on protection and management are set down in two covenants made among the jointly responsible authorities: the City of Amsterdam (Gemeente Amsterdam), the Central Amsterdam District (Stadsdeel Amsterdam Centrum) and the Amstel, Gooi and Vecht Water Board (Hoogheemraadschap Amstel, Gooi en Vecht). The signed covenants make up part of the management plan, as does a Declaration of Intent made by the stakeholders concerned with the property.*

### Basic principles

*The management plan for 17th-century canal ring area of Amsterdam within the Singelgracht must satisfy the conditions laid down by the World Heritage Committee. Specifically, it must conform to the following four basic principles:*

- Effectiveness – the plan should ensure realization of the objective;
- Coherence – the outlook, objectives, measures and tasks should be consistent;
- Functionality – the plan should be workable;
- Realism – the plan should be achievable and implementable.

*In order to satisfy these basic principles, the management plan describes:*

- A declaration signed by property manager, responsible authorities and stakeholders (as partners in the site) detailing their direct involvement in, their shared outlook on, and their agreement to combine efforts in protecting and conserving the property and the buffer zone. This will supplement the nomination dossier.
- A cycle of planning, implementation, monitoring, evaluation, adjustment and reevaluation of the management plan, set down by the property manager and coordinated by the World Heritage Office.
- Allocation of resources: provision of sufficient manpower, relevant expertise and sufficient time will be estimated and prepared for operation in the project plan to be drawn up for the World Heritage Office.
- Financing by the World Heritage Office: a project plan drawn up for this purpose by Central Amsterdam, with sections on implementation. A balanced and transparent description of the implementation of the management system (management plan, specifically Chapter 4, agreements on tasks, competences and responsibilities, and Chapter 3 Section 3.6, improving management: operational plan and action plan).
- It is the task of the yet to be established Amsterdam World Heritage Office to realize the implementation of the plan and to direct and coordinate its execution.
- The operability of the management plan will be assessed in practice and adjusted where necessary.

*(Kingdom of the Netherlands 2009, 'The 17th Century canal ring area of Amsterdam with the Singelgracht', Nomination document. p.53).*



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# **APPENDIX B – Rideau Canal Draft Mangement Plan**

PARKS CANADA AGENCY  
Draft Plan for  
Rideau Canal National Historic Site and  
UNESCO World Heritage Site  
(including Merrickville Blockhouse National Historic Site of Canada)  
February 2020

February 2020

# Rideau Canal

National Historic Site of  
Canada and UNESCO World  
Heritage Site (including  
Merrickville Blockhouse National  
Historic Site of Canada)

Draft Management Plan

© Her Majesty the Queen in Right of Canada, represented  
by the Chief Executive Officer of Parks Canada, 2020.

RIDEAU CANAL AND MERRICKVILLE BLOCKHOUSE NATIONAL HISTORIC SITES OF CANADA  
MANAGEMENT PLAN, 2020.

*Cette publication est aussi disponible en français.*

For more information about the management plan or about

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## 1.0 Introduction

Parks Canada manages one of the finest and most extensive systems of protected natural and historic places in the world. The Agency's mandate is to protect and present these places for the benefit and enjoyment of current and future generations. Future-oriented, strategic management of each national park, national marine conservation area, heritage canal and those national historic sites administered by Parks Canada supports the Agency's vision:

*Canada's treasured natural and historic places will be a living legacy, connecting hearts and minds to a stronger, deeper understanding of the very essence of Canada.*

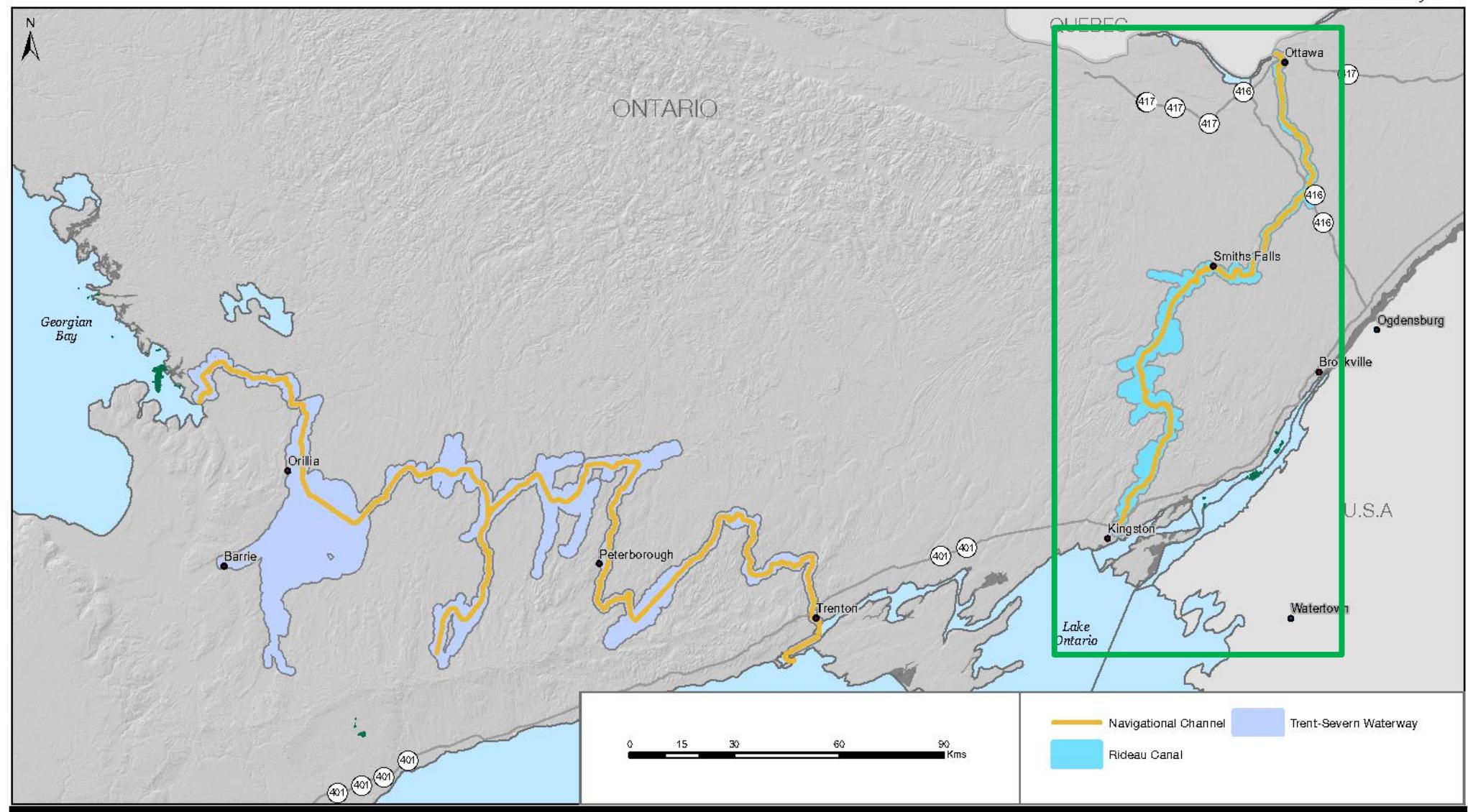
The *Parks Canada Agency Act* requires Parks Canada to prepare a management plan for national historic sites administered by the Agency. The *Rideau Canal and Merrickville Blockhouse National Historic Sites of Canada Management Plan*, once approved by the Minister responsible for Parks Canada and tabled in Parliament, ensures Parks Canada's accountability to Canadians, outlining how historic site management will achieve measurable results in support of the Agency's mandate.

Canadians, including Indigenous peoples, were involved in the preparation of the management plan, helping to shape the future direction of the national historic sites. The plan sets clear, strategic direction for the management and operation of Rideau Canal and Merrickville Blockhouse National Historic Sites by articulating a vision, key strategies and objectives. Parks Canada will report annually on progress toward achieving the plan objectives and will review the plan every ten years or sooner if required.

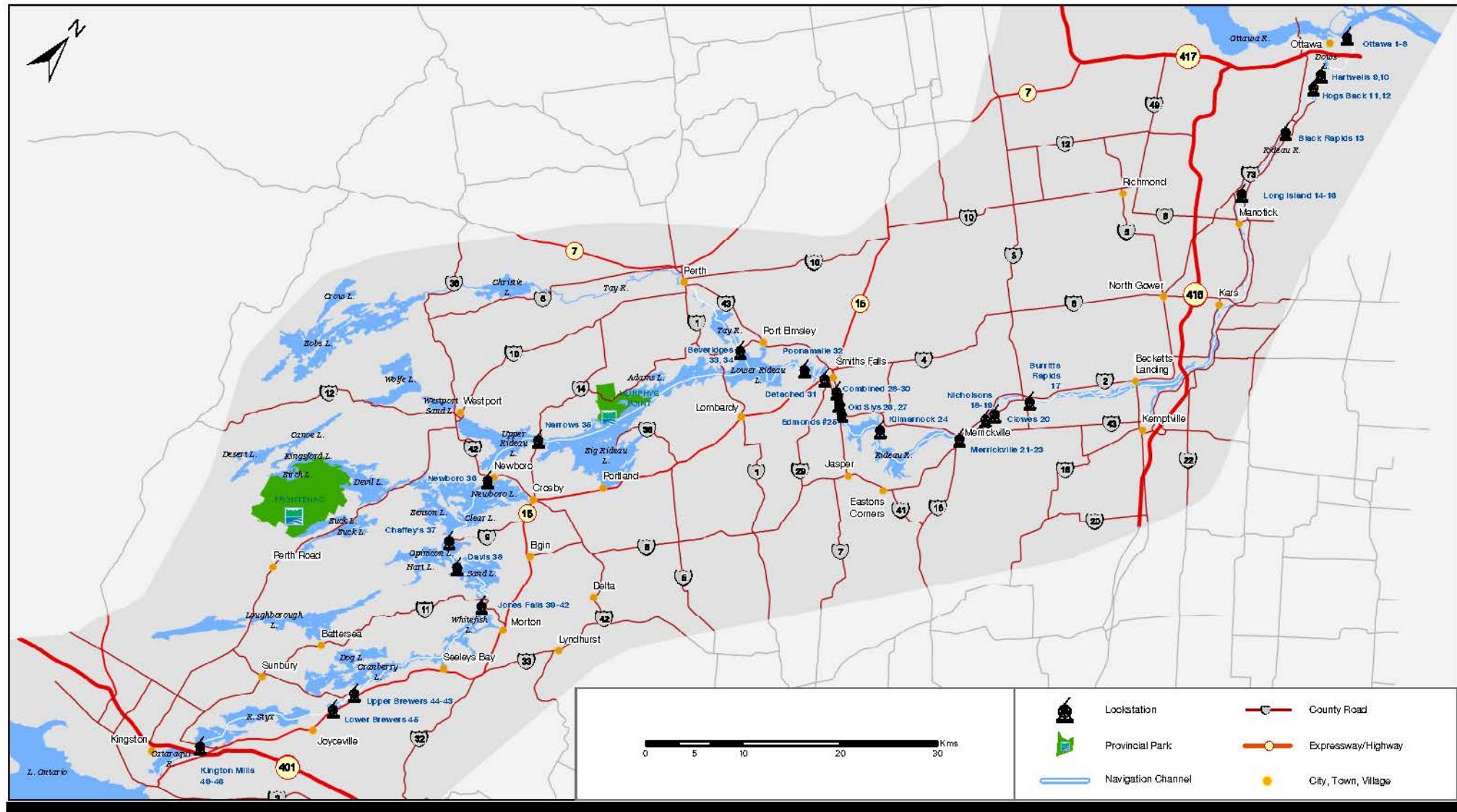
This plan is not an end in and of itself. Parks Canada will maintain an open dialogue on the implementation of the management plan, to ensure that it remains relevant and meaningful. The plan will serve as the focus for ongoing engagement on the management of Rideau Canal and Merrickville Blockhouse National Historic Sites in years to come.

Map 1: Regional Setting

Ontario  
Waterways



Map 2: Rideau Canal National Historic Site



## 2.0 Significance of Rideau Canal and Merrickville Blockhouse National Historic Sites

The Rideau Canal was conceived in the wake of the War of 1812 to serve as a war-time supply route providing a secure water route for troops and supplies from Montreal to reach the settlements of Upper Canada and the strategic naval dockyard at Kingston.

The original plan for the Canal called for the construction of dams, and locks that could handle small barges. With considerable foresight, Lieutenant Colonel By advocated for a larger lock system that would accommodate the new steamboats which were beginning to ply the Great Lakes. Plans were also made to establish fortified lockmaster houses and blockhouses at lock stations deemed especially vulnerable.

Work did not begin until 1827: construction was difficult as the route passed mostly through unsettled wilderness. Irish immigrants, French Canadians and Scottish stonemasons were among the contracted labour force brought in to push the canal through the rough bush, swamps and rocky wilderness of Eastern Ontario. Most of the locks and dams were built of stone quarried near the construction sites. Timber for lock gates, bridging and buildings was sourced locally, while the necessary iron fixtures were forged by local blacksmiths using flatiron imported from England, and iron castings were sourced from established foundries in Lower Canada.

The Rideau Canal was officially opened in the summer of 1832 with 47 locks, 23 lock stations and supporting dams and swing bridges. The Canal was expanded in the 19th century when the Tay Canal connected the town of Perth to the Rideau Canal in 1887. The construction of the Canal was an incredible engineering feat at the time: today, it still serves as a monument to the great 19th Century canal building era in North America.

**Prior to the Canal's construction, these lakes and rivers were important traveling and trading routes for Indigenous peoples.** In the north, the Rideau Canal connects to the Ottawa River near the confluence of three major rivers, an area that historically has been a natural meeting place and focus for trade.

The natural beauty of the area through which the Canal passes, along with the promise of excellent sport fishing and hunting, swimming, and boating, stimulated outdoor recreation and tourism. By the end of the 19th Century, hotels and private cottages made their appearance along the waterway. By the end of the First World War, commercial traffic disappeared almost entirely from the Rideau Canal. The system was saved from abandonment in large part due to the high cost of decommissioning the waterway: since that time, there has been a massive expansion of the recreational use of the Rideau Canal.

Today, the value of the Rideau Canal has been recognised in many ways:

1. In 1925, the Historic Sites and Monuments Board of Canada declared the Rideau Canal to be a site of national historic significance for:
  - the construction of the canal system;
  - the survival of a high number of original canal structures including locks, **blockhouses, dams, weirs and original lockmasters' houses plus the integrity** of most lockstations; and
  - the unique historical environment of the canal system.
2. In 2000, the Rideau River, which forms a significant part of the Rideau Canal, was designated a Canadian Heritage River for its human heritage and recreational values. These values include the Canal system, its historical setting,

the wide range of water-based recreational activities, and water quality suitable to recreation.

3. Most recently, in 2007, the Rideau Canal was inscribed as Canada's 14th and Ontario's only World Heritage Site. It is considered of universal value by the United Nations Educational, Scientific and Cultural Organization (UNESCO) for being the best-preserved 'slackwater' canal in North America, and the only one dating from the great North American 19th-century canal-building era that still operates along its original route with most of its original structures intact. It is also recognized as a significant example of a canal used for military purposes associated with a significant stage in human history – that of the fight to control the north of the American continent.

The Canal comprises a remarkable collection of cultural resources including locks, dams and weirs; a diversity of buildings; lockstation landscapes; archaeological sites and artifacts; and archival material. This includes the Merrickville Blockhouse, designated a national historic site in 1939 because it represents a fine example of the best type of blockhouse erected for the defence of the Rideau Canal. In the event of war, the Blockhouse was intended to be a mustering point for local militia, a supply depot where provisions, munition and arms could be stored, and a strong defensive position for repelling anyone attempting to destroy the Canal structures. It served its military function only once, in the aftermath of the 1837 Rebellion, when it was temporarily taken over by the 34th Regiment.

## 3.0 Planning Context

### 3.1 Geopolitical

The Rideau Canal stretches 202 kilometres, winding its way through wilderness, towns, and urban centres. It is bookended by Kingston, Canada's first capital, in the south and Ottawa, today's national capital, in the north. The Canal overlaps two (2) Conservation Authorities, three (3) regional tourism organizations, three (3) counties, nine (9) federal ridings, and (13) municipalities.

The sheer size of the Rideau Canal, and the two watersheds it connects, presents jurisdictional complexities. Parks Canada is responsible for the administration of the Rideau Canal National Historic Site, comprising the bed of the Canal up to the upper controlled water elevation limit, as well as the land associated with the lock stations and dams. In Ottawa, the National Capital Commission has land use and design approval authority over federal lands and maintains the scenic parkways, green space and pathways alongside the Canal.

Other government departments and agencies, at the municipal, federal and provincial levels, share responsibility for conservation, protection, land use and development, resource extraction, transportation, agriculture, water quality and tourism activities. Parks Canada works closely with each of these authorities to ensure activities adjacent to the Canal, most notably new development, do not negatively impact the Canal's commemorative integrity and outstanding universal value. As an example, the *Rideau Corridor Landscape Strategy* (2012) demonstrates Parks Canada's leadership and recognition towards heritage protection. Developed to guide the multiple jurisdictions along the waterway to address the UNESCO's recommendations for protection of the canal's visual values, the *Landscape Strategy* is the result of collaborative efforts from 13 local municipalities, three counties and many related jurisdictions.

### **3.2 Socioeconomic**

The Rideau Canal is one of the busiest National Historic Sites in Canada – welcoming nearly one million land-based visitors each year. The Canal corridor is in the heart of one of the most densely populated areas of the country, making it uniquely placed to enable young and urban Canadians to discover and connect with history and nature. Canadians, **residents and visitors cherish the Rideau Canal as a symbol of Canada's identity and take pride in their contribution to preserving this national treasure for future generations.** Residents of the Canal corridor value and protect the unique cultural and natural heritage character and scenic beauty of the Canal corridor.

Since 2015, Parks Canada has invested over \$75 million in projects to rehabilitate infrastructure assets on the Rideau Canal. These investments support the conservation of heritage assets while promoting visitor experience and improving public safety. An additional \$52 million will be invested in asset improvements by 2022.

The waterway is also the economic backbone of many of the small communities it connects, many of which rely heavily on tourism to contribute to their local economies. The economic contributions from the Rideau Canal can fluctuate as visitation to the Rideau Canal, whether it be by land or by water, is heavily impacted by factors such as fuel prices, exchange rates, social trends, and weather conditions.

Despite these challenges, the Rideau Canal also presents a wealth of opportunities to collaborate with all levels of government, Indigenous partners, community groups, not-for-profit organizations and businesses. Parks Canada is well placed to bring all these disparate groups together to celebrate, promote and enhance the corridor to become a world-renowned destination.

### **3.3 Indigenous Peoples and the Rideau Canal**

Indigenous peoples of North America have a strong connection with waterways. The waterways were an integral part of the livelihood of Indigenous peoples for all aspects of existence including fishing, hunting and gathering, transportation, trade, as well as cultural and spiritual gatherings. Archaeological information indicates that Algonquin peoples have lived in the Ottawa Valley for many generations, long before the Europeans arrived in North America. As a result of the slack-water engineering technology employed to construct the canal, submerged archaeological resources and sites may be located along former shorelines and islands.

When the Rideau Canal was first constructed, the new canal passed through mostly unsettled wilderness. As these lands were traditionally used by the Algonquins, Mohawk and Mississauga prior to canal construction, this military undertaking had an impact on their unique relationship to the land. In addition to labour, Indigenous Peoples aided canal construction through harvesting and supplying goods and provisions to the British military and trades peoples, and assisted in establishing the canal route based on traditional use and navigation of the lands and water.

Most of the Rideau waterway, from Ottawa to the height of land between the Rideau and Cataraqui watersheds near Kingston, is included in the Algonquins of Ontario Settlement Area, currently under negotiation with the Government of Canada and the Province of Ontario. The Agreement-in-Principle includes the **Algonquins' interest in the Rideau** Canal related to management planning, access fees, interpretation, and harvesting, in support of ongoing land claim negotiations. The southern end of the Rideau Canal in the vicinity of Kingston is home to the Algonquins, Iroquois, Mississauga and Mohawks.

The Rideau Canal engages with the Algonquins of Ontario, as well as the Mississauga of Alderville and the Mohawk First Nations at Akwesasne and Tyendinaga through management planning, review of development proposals, advisory committees and operational interactions. In the spirit of reconciliation, Parks Canada is actively pursuing

ways to grow our relationships with these communities through cooperation and new partnerships.

### **3.4 Living History**

The Rideau Canal is steeped in history and showcases rich cultural landscapes, which has cemented its place as one of the most iconic symbols of nation building in Canada. Today, lockmasters continue the tradition of manually operating the majority of the locks, stop-log dams and swing bridges that make up the canal system, providing passage to passing boats and spectacle for land visitors. The survival of a high number of original structures positions the Rideau Canal well to be an international symbol of commemorative integrity and authenticity. As custodians of this World Heritage Site, Parks Canada is committed to protecting the Outstanding Universal Value for which the Rideau Canal was designated.

The Rideau Canal was inscribed on the list of UNESCO World Heritage in 2007 on the basis of the following two criteria:

- i. The Rideau Canal remains the best preserved example of a slackwater canal in North America demonstrating the use of European slackwater technology in North America on a large scale. 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; and
- ii. The Rideau Canal is an extensive, well preserved example of a canal which was used for a military purpose linked to a significant stage in human history – that of the fight to control the north of the American continent.

Today, the recreational paradise of the Rideau Canal encourages the exploration of the many lakes, rivers and canal cuts by self-propelled and motorized watercraft. Visitors can stop in at the Smith Falls Visitor Centre to discover the cultural history of the waterway or take advantage of guided boat tours offered by commercial operators on the water. Parks Canada works with not-for-profit organizations who operate museums from historic canal buildings including the Bytown Museum, Merrickville Blockhouse Museum, and **the Chaffey's Lockmaster's House Museum**. The Canal serves as a venue for a range of important events and celebrations, for example, during the winter, the National Capital Commission transforms **the canal from Ottawa Locks to Hartwells Locks into the world's largest outdoor skating rink**.

### **3.5 Nature Legacy**

The Rideau Canal corridor has long been recognized as an area of special interest owing to its unique combination of cultural, natural, scenic and recreational values. The landscape of the corridor is a mosaic of agricultural land, wood lots, forests, wetlands, lakes and rivers, scenic shore-lands and urban settlements. This diversity of landscapes and natural resources contributes not only to the national historic significance of the Canal but also to its conservation value. There are extensive ecosystem features - lands, waters, plants and animals - under the jurisdiction of the Rideau Canal that are valued because they comprise an important component of the canal's history and landscape and as such are considered a vital heritage resource that must be respected and safeguarded. Conservation management actions, such as inventories, research, monitoring and impact analysis, are undertaken on an annual basis to ensure Rideau Canal effectively protects its biodiversity conservation value.

One significant effect of canal construction on the corridor landscape was the creation of drowned lands. Although the thousands of hectares of drowned lands now exist as natural features, like wetlands, most of these were human-made as a direct result of the slack-water system that flooded shallow waters to create the navigation route.

The Rideau Canal's natural environment is also home to a wide variety of flora and fauna, including many species which are threatened or at risk. There are at least 17 Schedule 1

Species at Risk that are known to be ‘regularly occurring’ at the site, and the Rideau Canal has been identified as containing critical habitat for 6 species covering more than 75% of the waterway. Additionally, there are many species of cultural importance to Indigenous Peoples, such as the American eel, living in and along the waterway. The threat of invasive species will also be an ongoing management challenge in the coming years.

### **3.6 Operational Realities**

Today, the Rideau Canal consists of 25 independent lock and bridge stations, including the Tay Canal to Perth. The operation of the lock and dam structures serves as the core purpose and function of the Rideau Canal. The Canal’s reputation as a premiere destination for pleasure craft is due in large part to the high quality service provided by Lockmasters and Lock Operators. In the 2019 season, over 61,000 vessels passed through one or more locks.

The built assets found across the Rideau waterway, such as locks, dams, weirs, canal walls and bridges, are valued at \$929 million. These assets are integral to the ongoing operations of an enduring, modern and working canal. Parks Canada is also the custodian of other structures, like blockhouses and lockmaster’s houses. The protection and presentation of these engineering works and buildings require sufficient and stable capital investments, ongoing corrective and preventative maintenance, and adequate resources to manage them effectively.

As the waterway has evolved over its lifetime, the overall management of water as a resource has remained central to its function. The Rideau Canal operates 26 dams across the Cataraqui and Rideau River watersheds. However, water levels and flows are no longer managed with only navigation in mind as **the canal’s infrastructure plays an important role in maintaining public safety**. Decision-making considers the entire water system and is balanced to meet a broad range of considerations and stakeholder needs across the watersheds. Climate change also places an increasing pressure on Parks Canada to manage the Rideau Canal to mitigate flooding and these challenges will only grow in complexity and scope.

Similarly, the complexities of the **Canal’s modern day** operations require a strong, responsive legislative and policy framework to ensure effective management. Today, Parks Canada responsibilities for the Rideau Canal include responding to tourism trends, managing economic growth and development responsibly, carrying out enforcement activities, and protecting the natural and cultural resources. Parks Canada is proud to continue the legacy of the countless stewards of the Rideau Canal who came before us, but must continue to champion continuous improvement and necessary change to support historic canals in the 21st Century.

## **4.0 Vision**

The heritage waterways managed by Parks Canada were once vital links for transportation and economic activity in what was to become Canada. Today, they continue to perpetuate this proud tradition in many Canadian communities by contributing to their socio-economic well-being.

The Rideau Canal is a recreational paradise in Eastern Ontario and a landmark to nation building in Canada. Managed by Parks Canada as a premiere heritage waterway and World Heritage Site, the Rideau Canal strives for excellence in the delivery of unforgettable experiences that immerse visitors in the living history and natural beauty it embodies. It is a cultural destination – a symbol of integrity and authenticity – where its engineering works, heritage landscapes and historic buildings are well protected and

appreciated.

Parks Canada has transformed the Rideau Canal into a sustainable historic site through meaningful cooperation with Indigenous partners, collaboration with organizations that share its values, and innovative partnerships with the vibrant communities it connects. The site is an entry point for people in urban centres to experience examples of the natural and cultural experiences that Parks Canada offers across the country. It is also the economic backbone of the communities of the Rideau Corridor, promoting outdoor recreation, low impact tourism and responsible development. The Rideau Canal serves as a symbol of commemorative integrity and is the best-preserved example of a slack-water canal in North America.

In the years to come, Parks Canada will continue to work with its partners to elevate the Rideau Canal, both nationally and internationally, into a world-renowned, welcoming and lively site that **inspires people to discover and connect with Canada's natural and cultural heritage**.

## 5.0 Key Strategies

The key strategies below frame the management direction for the Rideau Canal National Historic Site for the next ten years. The strategies and corresponding objectives and targets focus on achieving the vision for the site through an integrated approach to site management. Unless otherwise specified, all objectives and targets are meant to be achieved within the ten-year period of this plan. Annual implementation updates will be reported to Indigenous Peoples, partners, stakeholders and the general public, and will **feed into Parks Canada's broader business planning processes. More importantly, these strategies and their related objectives and targets will serve as the basis for engagement and consultation into the future.**

### **KEY STRATEGY #1 - REALIZING THE WATERWAY'S FULL POTENTIAL AS A GREAT CANADIAN OUTDOOR DESTINATION**

The Rideau Canal is an outdoor paradise and one of the most scenic and historic waterways in the world. In between Kingston and Ottawa, its key points of entry, the Rideau Canal consists of a series of beautiful lakes, rivers and canal cuts dotted by smaller communities and historic lock stations. While recreational boating use of the Rideau Canal remains a key focus, there are also increasing opportunities to encourage land-based visitors to explore new locations along the Canal and to attract new and different types of users to the waterway.

This key strategy seeks to offer visitors more diversified experiences, aimed at discovering and enjoying the great outdoors with low-impact recreational activities and with the support of organizations focused on conservation and sustainability. The Rideau Canal is well positioned to capitalize on these opportunities and trends, with its calm and flat water for paddling, its accessible land for camping, and its many connections to trails, rails and roads.

**Strategically expanding the Rideau Canal's World Heritage Site image and profile, by connecting visitors with more opportunities to experience its natural and cultural heritage, will enhance its reputation as a relevant and sustainable heritage waterway.** Parks Canada must also leverage new and existing partnerships to further animate the Rideau Corridor and to champion it as a destination, both at home and abroad.

### **Objective 1.1: Visitation Is Diversified through More Opportunities for Authentic Canadian Experiences like Paddling, Camping, Cycling and Hiking**

Targets:

- A visitor offer targeting paddlers locking through the Rideau Canal is developed and implemented by 2023.
- Trip planning tools (e.g. routes, brochures, guides, outfitters) and amenities/facilities (e.g. docks, showers, camping sites) for paddlers, hikers and campers are developed by 2025 in partnership with stakeholders.
- Yearly, at least one special event that promote camping, hiking, cycling and paddling on the Rideau Canal is hosted in partnership with stakeholders (e.g. Learn to Camp, Paddlefest).

### **Objective 1.2: Land-based Visitation to Lock Stations is Increased and Visitors are More Engaged with the Canal**

Targets:

- By 2024, two (2) master plans are developed, in collaboration with key stakeholders, for strategic lock stations (and/or groups of lock stations), that outline priorities for future site improvements to support visitor experience and canal operations. Examples could include Kingston Mills lock station, Jones Falls lock station, or the lock stations within the City of Ottawa. By 2030, an additional three (3) master plans are developed.
- By 2030, improvements to land-based programs and service offers are implemented (such as heritage accommodation) at five (5) lock stations. Opportunities for collaboration with local communities and stakeholders are identified as part of this process.
- Enhanced measurement of land-based visitation and demographic information is implemented by 2023 in support of developing marketing targets and diversified offers.
- By 2022, a Visitor Experience Strategy is developed for the Rideau Canal.

### **Objective 1.3: Relationships with Strategic Partners are Developed and Strengthened to Manage the Rideau Canal in a Collaborative Way**

Targets:

- Parks Canada meets annually with partners, stakeholders, organizations, local communities and the tourism industry to discuss ongoing management of the Rideau and to explore new initiatives and opportunities for the Canal.
- Parks Canada meets annually with key regional and municipal tourism organizations to ensure the Rideau corridor and its many attractions, amenities, services and experiences are collaboratively marketed and promoted, with a consistent approach that effectively leverages the Rideau Canal brand and the National Historic Site and UNESCO World Heritage Site designations.
- Relationships with domestic and international canals and world heritage sites are strengthened through collaboration and annual participation at the World Canals Conference and by working with the World Heritage Centre on matters relating to the UNESCO World Heritage Site designation.

## **KEY STRATEGY #2: DEMONSTRATING EXCELLENCE IN SUSTAINABILITY, PROTECTION AND PRESENTATION**

Canadians are proud in knowing that the Rideau Canal is an authentic, well-conserved and sustainable national historic site and world heritage site. The inscription of the Rideau Canal as a UNESCO World Heritage Site has increased public expectations of Parks Canada to improve visitor experience, levels of service, and heritage and natural conservation.

The Rideau Canal must find a way to work within its means as resources are finite, while creating more capacity to respond to increased expectations. Regular maintenance, strategic capital investment, and ongoing monitoring of cultural and natural heritage **resources are required to support the protection and presentation of North America's oldest continuously operated canal as the waterway approaches its 200th anniversary.**

In the spirit of reconciliation, Parks Canada will also work cooperatively with Indigenous Peoples who have traditional connections to the lands, waters, and histories of the Rideau Canal to expand the inclusion of Indigenous cultures and perspectives in interpretative and other opportunities on the Canal.

Sustainable development is **central to Parks Canada's mandate and vision.** As such, the Rideau Canal must do its part to support overall Agency goals for sustainable development with concrete local action.

### **Objective 2.1: The Rideau Canal's Engineering Marvels, Heritage Landscapes, and Natural Beauty Are Protected**

Targets:

- By 2030, the cultural landscapes at 5 key lock stations are described and documented to support the commemorative integrity of the waterway as well as visitor experience opportunities that support heritage connections.
- Long term asset management plans that protect and maintain the cultural and natural significance of the Rideau Canal are developed by 2025 and are reviewed annually.
- By 2029, at least 70% of engineering works of national significance are maintained in fair or good condition.

### **Objective 2.2: Indigenous Peoples Have Meaningful Opportunities to Connect with traditionally used lands and waters and Share Their Cultures**

Targets:

- The Algonquins of Ontario and the Mohawks of Akwesasne are engaged on an annual basis to discuss initiatives related to presentation of Indigenous cultures, histories and perspectives on the Canal.
- Through collaborative work with Indigenous communities, contracting opportunities and capacity are identified.

### **Objective 2.3: Ecological and Cultural Aspects of the Rideau Canal Are presented to visitors and Integrated in Tourism**

Target:

- The next Visitor Information Program survey shows an increase in its learning indicator as visitors at the Rideau Canal are educated about the cultural and natural heritage of the Rideau Canal through the use of new and emerging technologies.

#### **Objective 2.4: Sustainable Development Principles Are Better Integrated into Rideau Canal Operations**

Targets:

- By 2023, a strategy for the greening Rideau Canal field unit activities that includes adopting electric vehicles, increasing energy efficiency, and decreasing waste production, is developed and implemented.
- By 2030, the use of small-scale hydroelectric generation is implemented to support operations, reduce greenhouse gas emissions and offset energy costs.

### **KEY STRATEGY #3: MANAGING A 19<sup>th</sup> CENTURY CANAL IN THE 21<sup>st</sup> CENTURY**

The Rideau Canal has been relying on capital investments to manage and maintain many of its cultural resources in recent years. Significant investments through the **Government of Canada's Infrastructure Investment Program** have been made to protect the commemorative and structural integrity of the engineering works. Cultural resources with a high rate of deterioration, such as lockstation buildings, require stable funding and asset management capacity to monitor conditions and deliver conservation work in a timely, effective and cost-efficient manner.

Sustainable business development represents an opportunity for the Rideau Canal to generate revenue, off-set costs, and to reinvest in Canal assets and cultural resources, while enhancing visitor services and activities, and conserving and interpreting cultural resources in new, innovative, and exciting ways.

The Rideau Canal was initially designed primarily for military navigation. Today, Parks Canada is responsible for managing water levels and flows on the Canal on a year-round basis to achieve multiple objectives. These include navigation, flood mitigation, protection of the environment (e.g. fisheries and wildlife habitats), provision of water for municipal water supplies, recreation, and hydro generation. Public safety also represents a challenge as the canal was not initially intended for visitation. Extreme fluctuations associated with climate change patterns have resulted in challenges for water management decision-making.

Finally, the Historic Canal Regulations are antiquated and do not fully address the complexities of operating a historic canal in the 21st century. There are also limitations on existing regulations and legislation which impact the ability to issue permits and carry out enforcement. Developing modern, comprehensive and supportive regulations and tools will improve the ability of Parks Canada to effectively and timely respond to the diversity of visitor interest and needs, address the legacies left by industrial contamination, manage water levels and flows while responding to the impacts of climate change, and **will better support the Agency's regulatory authority on a** historic, navigable waterway in the 21<sup>st</sup> century.

### **Objective 3.1: Administrative Tools are Modernized to Comprehensively and Effectively Address the Complexities of an Operational Canal**

Targets:

- An analysis of gaps in the current statutory, regulatory and policy framework is completed and needed improvements within the Agency's control are identified by 2021.
- Compliance and enforcement capabilities are improved by establishing by 2021 in-house law enforcement capacity and through enhancing partnerships with other law enforcement agencies with jurisdiction.
- A review of in-water and shoreline works policies is completed by 2023 and changes that strengthen the protection of natural and cultural resources are implemented by 2024.

### **Objective 3.2: Sustainable Sources of Revenue Are Developed and Enhanced**

Targets:

- By 2025, the implementation of business licencing is expanded to include all commercial operators who use Parks Canada's lands and facilities or the bed of the Canal in support of their business operations.

### **Objective 3.3: Water Management Decisions Are Made Using a System-Wide Approach Based On Data**

Targets:

- The water monitoring network continues to be modernized through the on-going exploration and development of new tools and methodologies, such as hydrological modelling, and their integration into decision-making is reviewed on an annual basis.
- A formal communications protocol for communicating Parks Canada water management information to stakeholders is in place by 2022.
- An assessment to identify the potential impacts of climate change on water management is conducted by 2025 to support adjustments to data gathering approaches.

## **6.0 Management area: Merrickville Blockhouse National Historic Site of Canada**

### **Significance**

Merrickville Blockhouse is situated on the grounds of the Merrickville Lockstation in the Village of Merrickville-Wolford, 60km southwest of Ottawa. Built in 1832-33, the Blockhouse is the largest and the most impressive of the four blockhouses built along the Rideau Canal and the second largest surviving in Canada. In the event of war, the Blockhouse was intended to be a mustering point for local militia, a supply depot where provisions, munition and arms could be stored, and a strong defensive position for repelling anyone attempting to destroy the Canal structures. It served a military function only once, in the aftermath of the 1837 Rebellion, when it was temporarily garrisoned by the 34th Regiment.

As a cultural resource of national significance associated with the Rideau Canal, a classified federal heritage building, and as a national historic site itself, the Blockhouse is a landmark within the village and along the Rideau Canal. Great care is needed to conserve and maintain this impressive structure, which has thick masonry walls, gun ports for mounting cannons, loopholes to defend from attackers, and a ditch surrounding the building.

The Blockhouse and its extensive interpretive collection provide an authentic and engaging glimpse into the original defensive role of the Rideau Canal and foster a deep connection for the local citizens and its visitors.

### **Planning context**

The Merrickville Blockhouse has been leased since 1966 to the Village of Merrickville-Wolford, and operates as the Blockhouse Museum by the Merrickville and District Historical Society. The museum comprises a collection of artifacts and archives which reflect the history and industry of the Canal and the surrounding urban and agricultural community. The site also offers interior and exterior interpretive panels about the significance of the Merrickville Blockhouse and the Rideau Canal. The Museum is operated from May to October by a group of volunteers and students and welcomes approximately 10,000 visitors annually.

Capitalizing on opportunities for collaboration between the Blockhouse Museum and the Rideau Canal can broaden visitors' understanding of the evolving role of the waterway and its impact on shaping the region, and engage visitors in experiencing the latest chapter in the canal's long history.

An integrated management approach for the Merrickville Blockhouse is recommended, given the long history of collaboration with many community partners, its connections to the Merrickville Lockstation, as well as **the site's prominence** within a community of many other historical assets.

### **Vision**

For the next 20 years, the Merrickville Blockhouse remains a landmark within the Village of Merrickville-Wolford that is appreciated and enjoyed for its historical significance in the defense of British North America, as an integral part of the Rideau Canal, and as a treasured local museum.

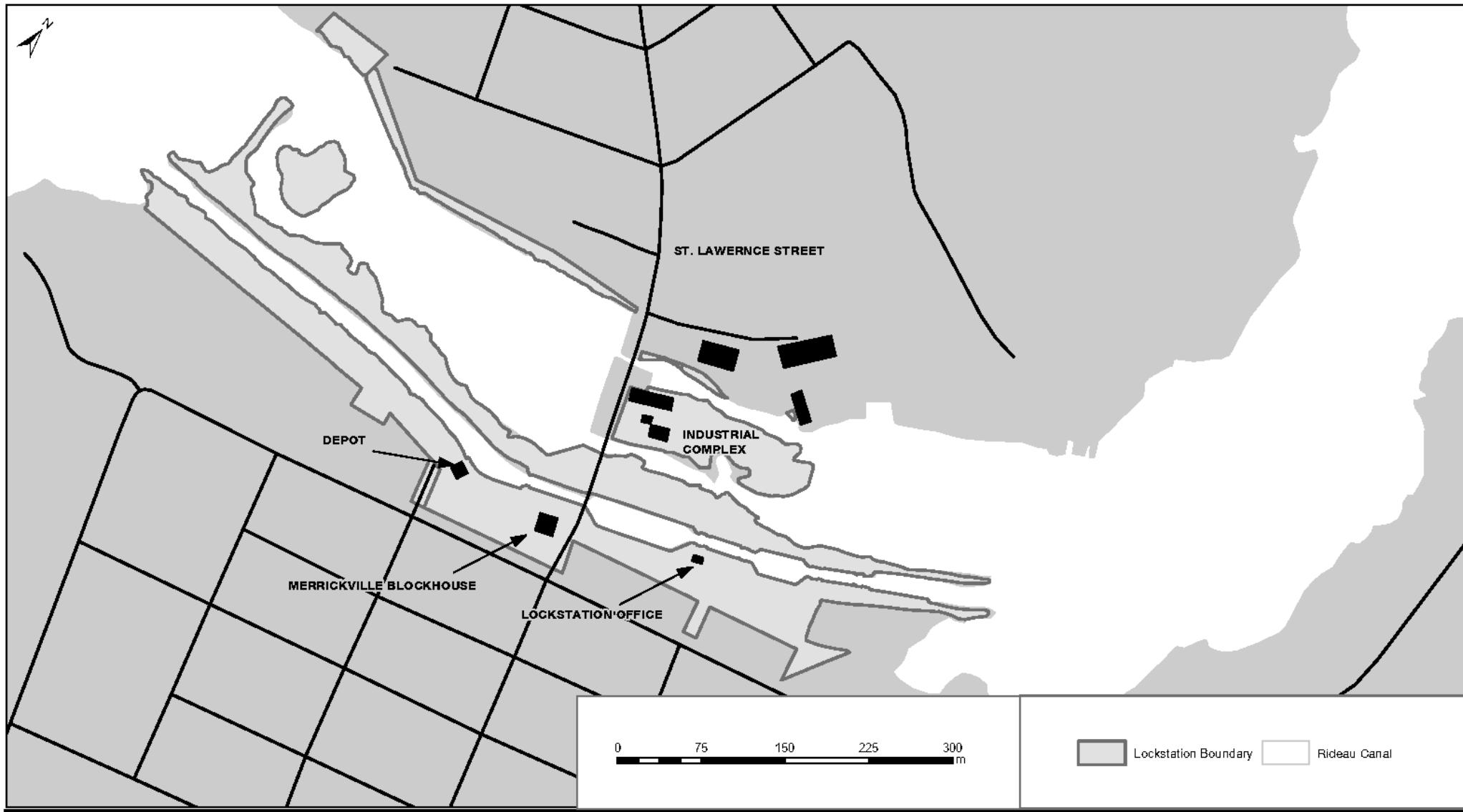
### **Objective**

A renewed and strengthened collaboration between Parks Canada, the Village of Merrickville-Wolford and the Merrickville and District Historical Society in the areas of interpretation, promotion and asset maintenance ensures the Merrickville Blockhouse remains a must-see destination for visitors of the Rideau Canal.

Targets:

- The Merrickville Blockhouse is maintained in fair to good condition in the next State of the Site assessment through regular monitoring, maintenance and repair.
- By 2025, a dialogue is initiated to identify opportunities for collaboration in visitor experiences and marketing and promotions efforts at Merrickville Lockstation.

Map 3: Merrickville Blockhouse National Historic Site and Lockstation



## 7.0 Summary of Strategic Environmental Assessment

The purpose of a strategic environmental assessment is to incorporate environmental considerations into the development of public policies, plans, and program proposals, to support environmentally-sound decision making. In accordance with *The Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals (2010)*, a strategic environmental assessment (SEA) was conducted on the Rideau Canal National Historic Site and Merrickville Blockhouse National Historic Site Management Plan.

Many positive effects will occur as a result of the implementation of the plan, for example: Key strategy 3 identifies several areas where modernizing the management approach at the canal is overdue, and identifies the key priorities to achieve those objectives, including: Updates to the legislative and policy framework, modernizing the approach to water management using data-based decision making, and enhancing the protection of natural and cultural resources through a review of the in-water and shoreline works policies. These updates are anticipated to benefit natural resources, cultural resources, visitor experience, and improve operations. The management plan will help connect Canadians with nature contributing to the implementation of the Federal Sustainable Development Strategy. The Management Plan also supports the Federal Sustainable Development Strategy goals of Healthy Coasts and Oceans, and Pristine Lakes and Rivers.

Strategies/objectives/targets identified in the management plan that could potentially result in negative environmental effects include: The development of new land-based programs and service offers at strategic lock stations; and development of new amenities and facilities for paddlers, hikers, and campers. However, these effects can be minimized by proactively incorporating strategic input from natural resource conservation and cultural resource management experts early in the planning of these concepts to help identify opportunities and constraints. Done properly, this can augment positive results and avoid or minimize negative effects. Operations at the site are required to mitigate impacts on climate according to Greening Government requirements in support of the Federal Sustainable Development Strategy, and specific objectives have been identified to do so.

Indigenous partners, stakeholders and the public will be consulted on the draft management plan, including a summary of the draft strategic environmental assessment. Feedback will be considered and incorporated into the strategic environmental assessment and management plan as appropriate.

There are no important negative environmental effects anticipated from the implementation of the management plan. Individual projects at the site will be evaluated separately under the *Impact Assessment Act*, or successor legislation, as necessary.