



Box 91, Seeley's Bay, ON K0H 2N0

613-305-3507

[info@rwlt.org](mailto:info@rwlt.org)

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March 31, 2021

Mr David Britton  
Director  
Ontario Waterways  
Parks Canada  
Peterborough ON

Dear Mr Britton:

I'm writing to provide you with comments and suggestions on the draft 2021-2031 management plan for the Rideau Canal National Historic Site. The Rideau Waterway Land Trust, celebrating its 25<sup>th</sup> anniversary this year, is the custodian of 20 properties covering 2000 acres across the territory traversed by the Rideau Canal.

We recognize the challenges Parks Canada faces in managing a 200-kilometre long national historic site incorporating heritage and ecological features and associated issues and concerns that come with these responsibilities. We are also well aware of the complex jurisdictional setting involving three levels of government and multiple departments and ministries which do not share a vision of how the Rideau Waterway should be managed. We note that UNESCO, in recent correspondence with the federal government on the management of the Rideau Canal World Heritage Site, has recommended that "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."

The RWLT believes that action in this regard should be explicitly set out in the management plan, with time frames specified for implementation. This would provide for collaborative systems-based decision-making regarding the Rideau Canal and its setting, and support dealing with the cumulative impact of individual development initiatives, in a manner that is consistent with the Provincial Planning Statement. This is an important element of the work in the next decade required to protect the numerous significant cultural heritage landscapes and natural attributes along the Canal. It is recognized that the public, and private sector entities, have important responsibilities and roles to play in this regard, but this will require Parks Canada leadership, including the establishment of ongoing consultative mechanisms, involving regular meetings of all involved parties, operating in a transparent manner.

We note that the draft plan, in section 3.5, cites the "diversity of landscapes and natural resources that contribute not only to the national historic significance of the Canal but also to its conservation value".

Other factors of significance mentioned in section 3, Planning Context, include species at risk and their habitat, and drowned lands created when the Canal was constructed. The management plan should set out actions Parks Canada will take to protect species at risk and important habitat settings, to say nothing of invasive species, in light of climate change impact over the ten-year period covered by the plan.

Given Parks Canada's pre-eminent role with regard to water management on the Rideau Canal, and as follow-on to the comment above about climate change, and detailed in the plan, section 3.6, under Operational Realities, why are specific actions in this regard not spelled out as part of Objective 3.3 under Strategy #3?

The RWLT is disappointed to see that the Number 1 strategy set out in the plan focuses on tourism promotion. It seems to us that the leading priority should be sustainability, protection and presentation, listed in the draft plan as Number 2. It would seem logical that priority be given to protecting the heritage and ecological features that attract visitors to the Rideau Canal. This would reflect Parks Canada's mandate with respect to protecting national historic sites, as stated in the Parks Canada Act "to manage visitor use and tourism to ensure the maintenance of both the ecological and commemorative integrity." As it currently stands, the draft plan reads as though the vision of Parks Canada is to operate the Canal and attract lots of paying visitors, rather than maintaining and protecting ecological and heritage/commemorative integrity.

The Rideau Canal is much more than a recreational waterway. Parks Canada has recognized this in the past through initiatives such as the Rideau Corridor Landscape Study. We should not forget the United Nations' definition of the three pillars of sustainable development: environment, economy and society.

We share the concerns expressed by other organizations, notably lake associations, regarding ecological integrity. As Parks Canada can and should play a leadership role in the management of the Rideau Waterway, there should be specific actions regarding sustainable ecological management in the Canal management plan. As it is, the draft plan in objective 3.1 of Strategy #3 refers to a review of in-water and shoreline works policies, but does not set out any measures to maintain ecological integrity. With our experience stemming from our stewardship of sensitive and ecologically significant properties along the Rideau Waterway, we are well aware of the challenges in maintaining ecological integrity. We have a policy framework to guide our actions and management plans for each property. Our plans involve time-bound actions, with the qualifier that the work is dependent on availability of funds – always an issue for volunteer-based, not for profit organizations. But we know it can be done and we strive to do so. Hence our expectations of the Parks Canada Rideau Canal management plan.

The 1996 Rideau Canal Management Plan was a forward-looking document, guiding and encouraging supportive action by many different interests. Section 6 of that Plan, Achieving the Vision: A Strategy for Action, provided direction. An example can be found on p. 47: "Parks Canada will foster and support local efforts to protect the historic, natural and scenic features of the Canal Corridor. Community efforts to protect land will be encouraged. This includes donations of land or money, stewardship agreements and awareness programs." Community volunteers took this message to heart and formed the Rideau Waterway Land Trust (RWLT) that same year!

The 2005 Rideau Canal Management Plan continued and strengthened support for the RWLT, specifically identifying ways Parks Canada would work with the Trust to achieve mutual goals (see pp 24, 31, 50, 58 and 62). RWLT did its part and Parks Canada was an enthusiastic partner. An example was the major financial support Parks gave to the Trust's fundraising campaign to purchase an

important property on Morton Bay. Rock Dunder was acquired in 2006 and now attracts thousands of visitors to the Rideau every year.

The 2021 draft Rideau Canal management plan does none of this. When we look back at how clear, supportive and helpful the previous management plans were, we are disappointed with the current document. There is an opportunity for Parks Canada to resume the leadership role it previously took and generate the enthusiasm needed to achieve a unified vision for the Rideau Canal. The next revision to the draft management plan is a good place to start, outlining the framework for the sustainability of the Rideau Canal waterway for generations to come.

A handwritten signature in black ink, appearing to read "Peter Hannah". The signature is fluid and cursive, with a large initial "P" and "H".

Peter Hannah  
Board Chair  
Rideau Waterway Land Trust