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Pam Veinotte
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Parks Canada Agency
30 Victoria Street
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Re: Heritage education and presentation of the Rideau Canal NHS

Dear Executive Director Veinotte,

I am writing with deep concerns about the lack of heritage presentation of the Rideau Canal and other issues relating to Parks Canada's heritage management of the canal. I am hoping that your appointment as Executive Director signals a return to Parks Canada core values on the Rideau Canal, something that has been lacking since 2012. Also that Parks Canada will follow the Minister's recent directive for "*an emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs*" – something that has yet to happen on the Rideau Canal National Historic Site.

I am a heritage expert concerning the Rideau Canal and I'm also one of the largest sources of public information about the canal (both contemporary and historic) through my very popular Rideau Canal website, www.rideau-info.com, my books about the canal, including my free Rideau Canal Paddling Guide, and my volunteer work with several Rideau heritage organizations, including Friends of the Rideau. My comments come from a deep knowledge base about the canal, and of Parks Canada's operation of the canal over the last 20 years.

Heritage Presentation & Public Education

I've attached my heritage report card for the Rideau Canal which shows a grade of D. Each of the issues is discussed in detail on my Save Our Rideau website (www.SaveOurRideau.ca). You've to look no further than the "new" Parks Canada Rideau Canal website which went up in April 2017 with no (zero) cultural heritage information about the Rideau Canal. No history, no heritage, no stories, no information about the canal's National Historic Site of Canada or UNESCO World Heritage Site designations. It's unbelievable to me this was done by Parks Canada who have a legislated mandate to present the cultural heritage of the canal and commemorative integrity public education policies that require the reasons for the canal's NHS designation to be effectively communicated to the public. UNESCO has similar public awareness requirements for its WHS designation.

Heritage presentation and public education are very large issues, but they boil down to the fact that Parks Canada's operation of the Rideau Canal is not being done following Parks Canada's own heritage requirements. There is no heritage staffing, no heritage interpretation unit, no heritage manager, no heritage focus. This must change for Parks Canada to meet the Minister's directive and its own legislated requirements and commemorative integrity policies.

Public Engagement

My comments here are about public engagement with the Rideau heritage community, informed members of the public such as myself and organizations such as Friends of the Rideau. In a nutshell, there is essentially no engagement taking place. The only person to have done this was former Association Director John Festarini, although only on an ad-hoc basic. There used to be a formal mechanism, the Rideau Canal Advisory Committee, which was terminated by Parks Canada in 2011. Despite requests, Director Cunningham has refused to re-form the committee and has also refused to discuss heritage issues affecting the canal.

I'll include a quote from Larry Ostala, the former Vice-President of Heritage Conservation and Commemoration at Parks Canada, who, in 2010, addressed the problem of lack of public engagement by Parks Canada (this applies to the current management of the Rideau Canal):

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 1999 State of Protected Heritage Areas also pointed out this problem 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."*

Those statements remain true today. It also remains true that none of that is being done on the Rideau Canal. Public engagement must start with the senior management level since many of the issues that people such as myself and organizations such as Friends of the Rideau, wish to talk about, are policy issues which can only be effectively discussed with senior management (Superintendent level equivalent).

Rideau Canal Management

It's very troubling that there is no senior manager located in the Rideau Canal Office of Parks Canada (RCO) at this time (and for most of 2018). In 2012, a full time Superintendent for the Rideau Canal was replaced by a Director, who in 2013 was located on the Trent-Severn, looking

after both the Rideau and Trent-Severn, making the superintending of the Rideau Canal quite literally a part-time job. It's a basic tenet of good management that proximity counts, in order to effectively manage the Rideau Canal, there needs to be senior managers in the Rideau Canal Office. The learning curve for the complexities of the Rideau Canal is very steep, measured in years not months. We need steady, long term, well informed senior management located on the Rideau Canal NHS.

The retiring Director of Operations wasn't initially replaced in 2012 (made into an acting position with junior staff), an eventual replacement lasted only a year and then in late 2015 we got an Associate Director (John Festarini) located on the Rideau Canal. However, since that time, John has taken assignments in other parts of Parks Canada and has now been away since February 2018. He was not replaced with an acting position on the Rideau Canal.

Today, with no senior manager located on the Rideau Canal, important issues such as heritage are simply not being discussed. We also see issues such as continued delays with the development of the Rideau Canal management plan, which is in part due to the lack of a senior manager on the Rideau Canal to help move the process along.

Associate Director John Festarini was due back to the RCO on November 1, but I've heard troubling news that he will continue to be away for an extended period. Clearly we need to see a replacement for this position in the Rideau Canal Office as soon as possible.

Other Issues

There are many other issues that Parks Canada is failing to address. I'll just list a few:

- **Heritage Staffing** – the Rideau Canal does not have any qualified heritage interpretation staff. The small interpretation unit that used to exist was removed in the 2012 re-organization. The RCO needs a qualified heritage manager, such as a public historian, someone who can develop and implement a robust heritage interpretation program and look after the many other heritage issues impacting the canal. To date I've seen no movement on resourcing the Rideau Canal with such staff.
- **UNESCO's 2006 recommendation to define and protect the visual values of the Rideau Canal** has been allowed to languish. A badly flawed consultant's report was released in early 2013. It failed to properly identify the visual values of the canal and the landscape character mapping contained many gross errors. Parks Canada continues to cite that report even though they have a review of the report by experts detailing its many deficiencies. Protection of the visual values has yet to be achieved and there appears to be no active work being done at this time to meet the UNESCO recommendation.
- **Signage** – it's a bit unbelievable to me that there is no signage for the Rideau Canal on major highways such as 401, 416 and 417. Other national historic sites have prominent signage on major highways, the Rideau Canal doesn't.
- **Lockstation Landscape Studies** – in 2015, very cursory and incomplete landscape studies were done on four lockstations. A critique of the Jones Falls study was given to the RCO and a promise was made in 2017 that a "strategic objective around the need to identify and evaluate landscapes [will be included] in the Management Plan. Then we can incorporate a

certain number of them into our work plan each year.” I haven’t heard anything since. There is a need to do proper landscape studies of all the lockstations, I’ve volunteered my time to help with these. I trust that a commitment to these required lockstation landscape evaluations will appear, as promised, in the new management plan.

- **Jones Falls Heritage Interpretation Plan** – the RCO has in hand an interpretation plan for Jones Falls, developed by Don MacKay, one of the very few people you have with knowledge of proper heritage presentation (both physical to the site and live interpretation). The draft plan was completed sometime last winter. I requested a copy of the draft plan on September 3 and when I eventually received a reply on October 18 I was told that “the heritage interpretation plan is still in draft form and is being reviewed by the team” and that I can only see it once it has been reviewed (no date given for that). I’ve questioned who “the team” is since my worry is that the plan is being reviewed by the Business Development Unit (BDU). This type of plan must be reviewed by qualified heritage interpretation staff, not through the non-heritage lens of the BDU.
- **Management Plan** – it was very disappointing to hear that a public draft of the new management plan has been delayed yet again and is now going into the last year it can be done to meet the March 2020 deadline. I’ve also seen it recently alluded that public input into the plan will only be available on-line, I trust that my information in that regard is incorrect. There needs to be robust public engagement when the draft plan is finally made available for public review. There also needs to be time for Parks Canada to properly incorporate public input into the plan.
- **Public Transparency** – Ontario Waterways maintains a culture of secrecy, to the point where I had to do an ATIP request in 2017 to receive an organizational chart for Ontario Waterways. Since the first copies I received weren’t legible, I took the issue to the Office of the Information Commissioner who found it incredible that I had to use ATIP to get an organizational chart (to quote “shouldn’t that information be on their website?”). It’s just one example of the lack of transparency of the current Ontario Waterways.
- **Boating Numbers** – the Rideau Canal is the oldest continuously operated canal in North America. The value of boaters travelling the Rideau is both economic to the local communities located along the canal and an important part of the heritage presentation of the canal. It’s only when a boat is locked through that visitors to a lockstation get to see the incredible 19th century engineering of the locks in operation. The 2018 numbers are troubling since if vessel passages done by Le Boat are factored out, the numbers of other boaters are near the record low 2014 numbers. Part of this is due to lack of marketing to boaters. In Parks Canada marketing for the last few years we see images of oTENTiks and red chairs, we don’t see boats or even specific mention of the Rideau Canal. Parks Canada needs to do direct marketing to boaters (going to a few boat shows is far from sufficient). No one else is doing it – the Rideau Heritage Route Tourism Association is essentially defunct and never catered to boaters. The increase seen in 2017 was mostly due to movement by local boaters due to the free lockage. Parks must make much more of an effort to get more boats moving through the canal.
- **Heritage Initiatives** – in 2016, Friends of the Rideau proposed the re-introduction of the Rideau Canal Passport for 2017. This was eventually done, although as a very modest and

rushed effort. It combined tourism promotion with heritage, it was program designed to get people to visit all the lockstations and learn a little bit of Rideau heritage while doing it. Attempts by Friends of the Rideau to get that program continued by Parks Canada in 2018 failed. This is puzzling given its success both in terms of tourism and heritage and its modest cost. Similar to the lack of any cultural heritage information on the Rideau Canal website, it's another example of Parks Canada not resourcing heritage on the Rideau Canal.

I could go on but I will stop here with a few direct questions.

- 1) Will Parks Canada resource the Rideau Canal Office to properly meet the Minister's directive for "*an emphasis on commemorative integrity at national historic sites, together with the need to dedicate additional resources to education and interpretive programs*"? As made abundantly clear by this letter and my Save Our Rideau website, an emphasis on commemorative integrity, particularly in relation to heritage landscapes and public education, is simply not being done on the Rideau Canal today. Will Parks Canada provide the required heritage staffing and heritage funding to the Rideau Canal?
- 2) Will Parks Canada work at changing the culture in existing management staffing in Ontario Waterways, to put heritage, including commemorative integrity, particularly in relation to heritage landscapes and public education, as a priority in decision making? As mentioned at the beginning of this letter, you've to look no further than the current Rideau Canal website to see the complete lack of heritage focus in decision making by the RCO.
- 3) If it is true that Associate Director John Festarini will continue to be away, will Parks Canada return a qualified senior manager to the Rideau Canal Office in the near future? A manager who is able and willing to discuss the many heritage issues facing the canal with informed members of the Rideau public? The Rideau Canal needs stable, long term, well informed senior management located on the canal. We haven't seen that on the Rideau Canal since before the re-organization in 2012.

Yours truly,



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cc. Rt. Hon. Justin Trudeau, Prime Minister of Canada
Hon. Catherine McKenna, Minister of the Environment and Climate Change
Hunter McGill, Chair, Friends of the Rideau
Save Our Rideau

RIDEAU CANAL HERITAGE REPORT CARD – October 2018

By Ken W. Watson

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

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| Heritage Landscape Protection | D+ | There are two components to this, the heritage landscapes of the lockstations (a Parks Canada Commemorative Integrity requirement) and the visual character of the entire Rideau Canal (a UNESCO World Heritage Site recommendation). The rank of D+ is a combination of a C for heritage landscapes but a D- when it comes to the identification and protection of the visual values of the canal. Read more ... |
| Public Engagement | D | Upgraded in 2016 from an F to C since efforts (by 1 individual) are now being made to consult (in a true sense) with the public at large. Since 2010, Parks Canada has not consulted with the heritage public on anything it does on the canal. This was a change from the 1990s and early 2000s when it did a very good job at public consultation. Downgraded to C- in June 2017 and then to D in October 2017 since the bit of public engagement that was being done is now gone. There are still no formal mechanisms for meaningful public consultation. Read more ... |
| Public Education | F | Public Education is a key policy component of Parks Canada's Commemorative Integrity of the site and also a significant requirement Parks Canada's management of the site as a UNESCO World Heritage Site. However, essentially no educational or heritage awareness programs about the Rideau Canal are being done. Read more ... |
| Research & Archaeology | F | Parks Canada does not do any heritage research or archaeology (as opposed to the 70s and 80s when much was done). In 2012 they surplus (fired/let go) much of their heritage and archaeological staff (for the entire organization). They also shut down (removed) two local Parks Canada Rideau Canal libraries that aided local researchers. There remains a lot to do on the Rideau Canal, sites such as Jones Falls have had no significant archaeological work ever done on them. Read more ... |
| <p>OVERALL - Parks Canada scores a solid D (a score of 2.5 out of 5) when it comes to the heritage management of the Rideau Canal. It's part of their core mandate that they've been completely ignoring since 2012 (and partially ignoring since 1995). Parks Canada's stated focus is on revenue generation ("we are focusing on increasing revenue" - Jewel Cunningham, Director, Ontario Waterways, April 2015) part of the past government's philosophy of retailing Canada's heritage, something apparently being sanctioned by the present government since no changes have been made to have Parks Canada follow their own legislated mandate.</p> | | |

For more information see: www.SaveOurRideau.ca

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