



March 31, 2021

Mr David Britton
Director
Ontario Waterways
Parks Canada
Peterborough, ON

Dear Mr Britton,

I'm writing to provide you with Heritage Ottawa's comments on the draft 2021-2031 Management Plan for the Rideau Canal National Historic Site. Heritage Ottawa is the leading built heritage conservation information and advocacy organization in Ottawa.

Heritage Ottawa's analysis of the draft plan has been informed, inter alia, by the following documents: 2018 Fall Report of the Auditor General of Canada, chapter 2, Conserving Federal Heritage Properties; the November 2019 communication from the UNESCO World Heritage Centre, "State of Conservation of the World Heritage Property Rideau Canal"; and Parks Canada's document, Evaluation of National Historic Site Conservation, 2020.

We believe that the introduction to the plan should include an overview of the state of commemorative integrity for the entire Rideau Canal system, and Parks Canada's Cultural Resource Management policy framework for this National Historic Site. Heritage Ottawa believes that the draft plan should describe the changes in the condition of the Rideau Canal since the last management plan was published in 2005, to establish a baseline for the actions proposed for the period 2021 to 2031. Does your office have sufficient resources to implement the long-term asset management program that is suggested in the draft plan?

As a general comment, it seems to us that the document places much more emphasis on tourism than on heritage protection and commemorative integrity, making the ranking of the Key Strategies very difficult to understand. We recommend that the Key Strategies be prioritized as follows: Strategy #1 *Demonstrating Excellence in Sustainability*,

Protection and Presentation; Strategy #2 Managing a 19th Century Canal in the 21st Century; and Strategy #3 Realizing the Waterway's Full Potential as a Great Canadian Outdoor Destination.

Heritage Ottawa has focused its assessment of the draft Management Plan on Key Strategy #2, *Demonstrating Excellence in Sustainability, Protection and Presentation*. In assessing the supporting objectives and targets, however, the lack of transparency makes it difficult to provide comments, except perhaps to say that, for example, 10 years seems to be a very long time to describe and document the five key lock station cultural landscapes set as a target under Objective 2.1. Why are the lock stations not identified? How will progress in achieving this target be measured and what benchmarks will be used? Throughout the draft plan the targeting seems to be very soft.

You can understand that Heritage Ottawa has a particular interest in the protection of cultural landscapes along the Rideau Canal. We recognise the jurisdictional complexities along its length, but if Parks Canada is to exercise leadership in the development of consensus with regard to protection, as was hinted at in 2012 with the Rideau Canal Landscape Strategy, this must be spelled out in the Management Plan. We support the ICOMOS/World Heritage Centre advice to strengthen the management system for the Rideau Canal so as to protect the Outstanding Universal Values of the site, and remind you of Parks Canada's undertaking in the 2005 management plan to "...identify waterfront lands of historic, scenic and natural value and to protect them through municipal official plan designation and private land stewardship." We recommend that the Ontario Provincial Planning Statement be referenced as a key tool in this context.

Heritage Ottawa believes that it is insufficient for Parks Canada to take a narrow interpretation of its responsibility for just the buffer zone. This approach was evident in the case of the Chateau Laurier's proposed addition, the Lansdowne redevelopment – and the Flora Footbridge – the Vimy Memorial Bridge in the southern part of Ottawa, and the planned new facility for the Ottawa Hospital on a section of the Central Experimental Farm (a National Historic Site) immediately adjacent to Dow's Lake on the Rideau Canal. As ICOMOS has noted, these developments all fall outside the buffer zone but may/did have negative impact on the Rideau Canal's Outstanding Universal Values.

Heritage Ottawa supports Objective 3.1, the modernization of administrative tools to strengthen protection of natural and cultural resources. We advocate for legislation and regulations that enshrine updated historic canal regulations in law, recognizing the challenges and complexities of managing a 19th century heritage canal in the 21st century.

Finally, Heritage Ottawa supports the target, under Objective 1.3, of annual meetings convened and chaired by Parks Canada with strategic partners to discuss management of the Rideau Canal. In this context, the draft plan identifies the tourism industry specifically as a strategic partner. We believe that heritage organizations should also be identified as strategic partners given the Canal's status as a National Historic Site, a Canadian Heritage River, and a UNESCO World Heritage Site.

Heritage Ottawa would be pleased to discuss these points further with you and your team.

Yours sincerely,

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read "Richard Belliveau".

Richard Belliveau
President
Heritage Ottawa

cc. Hon. Catherine McKenna, MP
Hon. Mona Fortier, MP
David McGuinty, MP
Jim Watson, Mayor, City of Ottawa
Tobi Nussbaum, CEO, National Capital Commission
Christophe Rivet, President, ICOMOS Canada

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