# Evaluation of National Historic Site Conservation

Office of Internal Audit and Evaluation

Report submitted to the Parks Canada Performance Measurement and
Evaluation Committee: September 25, 2019
Approved by the Agency President & CEO: January 9, 2020

Parks Canada · Parcs Canada

Canada

**TABLE OF CONTENTS**

# EXECUTIVE SUMMARY

Parks Canada's National Historic Sites Conservation Sub-program involves the conservation of national historic sites administered by the Agency, as well as the management of a large inventory of Canada's archaeological sites, and historical and archaeological objects. On average, this sub-program accounts for an estimated 6% of the Agency's total annual expenditures. It is directly linked to the Agency's mandate to ensure the commemorative integrity of national historic sites.

## EVALUATION PURPOSE AND DESIGN

The sub-program was selected for evaluation as part of the Agency's commitment under the Treasury Board Policy on Evaluation (2009) to evaluate all direct program spending over a five-year period. This evaluation generally covers the period from fiscal year 2010-11 to 2015-16. Some activities and results that occur outside this period are considered where relevant; however, as significant time has elapsed since the conduct of this evaluation, it should be noted that many changes or updates to the program that may have occurred after the abovementioned timeframe are not reflected in the present report.

The evaluation examined the relevance and performance (i.e., effectiveness, efficiency, and economy) of the sub-program, consistent with the requirements of the Treasury Board Policy on Evaluation (2009). This approach is also consistent with the new Treasury Board Policy on Results introduced in 2016.

The management framework for the sub-program underwent significant changes during the period under evaluation. Our evaluation of performance examined the effectiveness of the sub-program to the extent possible given these changes and provides an assessment of their impact.

## EVALUATION FINDINGS

### Relevance

Overall, we found that the National Historic Site Conservation sub-program is relevant and consistent with the priorities, roles and responsibilities of both the Parks Canada Agency and the Government of Canada. While the cultural resources managed by Parks Canada are considered to be unique and irreplaceable, they are also at continual risk. The need to protect and conserve these valued resources justifies a continued need for the sub-program. Expected results for the sub-program reflect the Agency's mandate to ensure the commemorative integrity of Parks Canada's national historic sites.

### Performance

We found that Parks Canada's Cultural Resource Management Policy (2013) provides an adequate management framework for the program and is more explicit about requirements and accountabilities than the previous policy.

We found that Parks Canada has developed a Commemorative Integrity Statement and a management plan for the majority of its national historic sites. These are critical to the effective management of the sub-program. While we estimate that about 70% of these management plans are now outdated, Parks Canada has developed a schedule showing that all sites will have an updated document by 2022. There may also be a need to review some sites' Commemorative Integrity Statements to ensure that they continue to reflect advances in our knowledge or interpretation of history.

Given its mandate, maintaining the commemorative integrity of national historic sites is a key objective for the Agency. We found that Parks Canada exceeded its target to improve the Agency's overall average rating for the commemorative integrity of national historic sites by March 2013. However, this trend is no longer reported. Most existing commemorative integrity assessments (≥72%) are more than five years old.

The evaluation of the Agency's performance in achieving its intended outcomes for the sub-program can be divided into three broad areas:

- **Condition of Heritage Buildings and Engineering Works:** Given the significant work that Parks Canada has undertaken since 2009 to improve knowledge of its asset base, it is not possible to provide a reliable estimate of the extent to which the overall condition of the Agency's heritage buildings and structures has been maintained or improved. While there is evidence of specific projects completed to maintain or improve the condition of a number of targeted heritage assets, sub-program funding was insufficient to address most deferred work. Federal Infrastructure Investment funding introduced in 2014 will result in significant condition improvements across the Agency's entire asset base but is insufficient to address deficiencies identified since 2012.

  During the period under evaluation, Parks Canada also made improvements in its project management practices related to capital investments including the introduction of a new process to assess the impact of proposed interventions on cultural resources.

- **Condition of Historical and Archaeological Objects:** The Agency reports having more or less consistently achieved its target to maintain 90 % of its collection of historical objects of national significance in fair or good condition. Our ability to confirm these results or conclude on the trend in condition was impeded by issues with data quality. In 2016, Parks Canada initiated the installation of a new cultural resource information management system. Given the poor state of the Agency's existing databases, data migration may be an issue.

  We found that Parks Canada's objects are stored in varying conditions of security and environmental control with potential impacts on the stability of their condition. Progress towards consolidation of the Agency's collection from its existing collection warehouses into a single, custom-built facility that would meet museological standards has been slow. In the interim, large parts of the Agency's collection remain at risk.

- **Condition of Archaeological Sites:** Parks Canada lacks a centralized record of archaeological sites or their condition that we could use to estimate the number of sites under threat. Those linked to national historic sites are generally reported to be in good condition, but these represent a small sub-set of the Agency's total inventory of archaeological sites. While we found a lack of coherent criteria used to prioritize interventions against its corporate target, Parks Canada has made significant progress towards identifying and reducing threats to these select archaeological sites.

The vast majority of the sub-program's resources were dedicated to conservation and maintenance. However, work required to assess the condition of heritage structures, objects and archaeological sites and provide appropriate conservation have exceeded Parks Canada's capacity to deliver. The Agency has responded by establishing criteria to prioritize investment of human and financial resources, focusing efforts on cultural resources of national historic significance, and is undertaking analyses of options that

will enable it to align available financial support with costs required to ensure the sustainability of Parks Canada's entire asset base.

**RECOMMENDATIONS**

**Recommendation 1:** The Vice-President, Indigenous Affairs and Cultural Heritage should complete and disseminate guidance required to support implementation of the Cultural Resource Management Policy.

**Recommendation 2:**  The Vice-President, Indigenous Affairs and Cultural Heritage, should review and propose solutions with respect to the human resources management structure for cultural resource management (CRM) at the Agency's Field Units to ensure appropriate capacity.

**Recommendation 3:** The Vice-President, Indigenous Affairs and Cultural Heritage, should review the structure for commemorative integrity assessments to ensure that it is effective in measuring the trend in commemorative integrity at Parks Canada's national historic sites.

**Recommendation 4:** The Vice-President, Indigenous Affairs and Cultural Heritage, should review performance measures for historical objects to determine an effective method for monitoring and reporting on the stability of its collection.

**Recommendation 5:** The Vice-President, Indigenous Affairs and Cultural Heritage, should document the process and criteria used to select priority archaeological sites to be tracked as part of the corporate performance framework.


**GLOBAL MANAGEMENT RESPONSE**

The data contained in this report was collected between 2010-11 and 2015-16; since the conduct of the evaluation, important changes have taken place which impact the program[1]. In 2015, as part of the Federal Infrastructure Investment (FII), the Agency received an investment of $1.3 billion over five years for the conservation of cultural assets. This investment will improve the condition and have a positive impact on the commemorative integrity of national historic sites.

As a result of the FII, the Agency developed tools for implementing its Cultural Resource Management Policy, including an impact analysis process and report. The program also benefited from the addition of resources in several functional areas, including those of architecture, archeology, object conservation and the management of cultural resources.

Since 2017, Parks Canada has conducted eight climate change and cultural heritage workshops, allowing the Agency to prioritize archaeological sites at risk and to consider possible adaptation measures. The FII also had a significant impact on Parks Canada's archeology program as mitigation measures for archaeological resources are now formulated for all projects, including those for contemporary infrastructure.

---

[1] Referred to as sub-program in the evaluation report. The timeframe for the evaluation reflects Parks Canada's previous Program Activity Architecture.

Three reports completed between 2017 and 2018 directly impacted Parks Canada's National Historic Sites Conservation Program: the 2017 Report of the Standing Committee on Environment and Sustainable Development (ENVI), the 2017 Minister's Round Table on Parks Canada Report and the Fall 2018 Report of the Auditor General of Canada. Each of these reports contained recommendations for the conservation of heritage properties under the responsibility of the Agency. Parks Canada has taken steps to respond to the recommendations made in these reports which also address issues raised in this evaluation.

In addition, in 2018 Parks Canada committed to reviewing its Cultural Resource Management Policy by 2023 in response to the Truth and Reconciliation Commission of Canada's Call to Action 79. It is expected that this work will bring significant changes to the application of the Policy. The renewed policy will be complemented by the policy instruments and tools needed to implement the changes. Finally, the Agency announced the construction of a new conservation facility in the summer of 2019, offering the climate and environmental control conditions necessary for their conservation.

# 1  INTRODUCTION

This report presents the results of the Evaluation of Parks Canada's National Historic Site Conservation Sub-Program. This sub-program was selected for evaluation as part of the Agency's commitment under the Treasury Board Policy on Evaluation (2009) to evaluate all direct-program spending over a five-year period. The National Historic Sites Conservation sub-program has not been subject to previous comprehensive evaluation work in the Agency.[2]

# 2  DESCRIPTION OF SUB-PROGRAM

**National Historic Sites of Canada** are places that have been designated by the Minister responsible for Parks Canada, on the advice of the Historic Sites and Monuments Board of Canada, in recognition of their direct association with a nationally significant aspect of Canadian history. These sites illustrate technological achievements, cultural traditions or ideas important to the development of Canada and/or that are explicitly and meaningfully associated with persons or events of national historic significance. They are located in all provinces and territories and can be found in almost any setting, from urban areas to remote wilderness environments. They may include buildings, engineering works, streetscapes or other cultural landscapes, sacred spaces, battlefields, and archaeological sites and can range in size from a single structure to a large-scale heritage complex.

As of March 2016, Canada's system of national historic sites included 979 designated places. Parks Canada owns and/or administers 171 of these. The conservation of this sub-set of national historic sites is the primary focus of the sub-program. The sub-program also involves the management of approximately 12,000 archaeological sites and a large inventory of historical and archaeological objects found in national historic sites, national parks, national marine conservation areas and the National Urban Park. These objects may be located on site or in one of six collection facilities currently operated by the Agency.

## 2.1  EXPECTED RESULTS AND TARGETS

Expected results for Parks Canada's National Historic Sites Conservation sub-program reflect the Agency's mandate to ensure the **commemorative integrity** of national historic sites on Parks Canada lands. 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;

> **Parks Canada's Mandate**
>
> "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."

---

[2]  The Office of the Auditor General of Canada completed an audit of Protection of Cultural Heritage in the Federal Government (2003) and a Status Report on the Conservation of Federal Built Heritage (2007).

- 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.[3]

Performance expectations related to the sub-program are found at all levels of outcome of the Agency's Performance Management Framework. Expected results and performance indicators for the past fiscal year (2016-17) are presented in Table 1. Tables that detail the evolution of these expectations from 2010-11 to 2016-17 can be found in Appendix A.

**Table 1. Expected Results of National Historic Site Conservation, 2016-17**

| Level of Outcome | Expected Result | Performance Indicator |
|---|---|---|
| Strategic Outcome | Canadians have a strong sense of connection, through meaningful experiences, to their […] national historic sites […] and these protected places are enjoyed in ways that leave them unimpaired for present and future generations. | |
| Heritage Places Conservation (Program 2) | Cultural resources of national significance at targeted national historic sites are maintained. | Number of targeted national historic sites where cultural resources of national significance are maintained. **Target**: 60 by March 2018.[4] |
| | Condition of heritage assets in poor or very poor condition is improved to fair or good.[5] | Percentage of assets assessed to be in poor or very poor condition that have improved to fair or good. **Target**: 100% by March 2020. |
| National Historic Site Conservation (Sub-Program) | Cultural resources of national significance at targeted national historic sites administered by Parks Canada are maintained. | Percentage of assessments completed that include measures to mitigate or reduce impacts to cultural resources. **Target**: 80% by March 2018. |
| | | Percentage of objects of national significance requiring conservation are in stable condition. **Target**: 90% by March 2020. |
| | | Number of archaeological sites where threats have been assessed and reduced. **Target**: 12 by March 2018. |

In 2013, the Agency introduced a revised Cultural Resource Management Policy that outlines the requirements for the management of cultural resources at Parks Canada, including specific direction for national historic sites. Expected results for the sub-program are aligned to the objective and expected results of this policy (see text box).

---

[3]   "Commemorative integrity" is referenced but not defined within federal legislation administered by the Agency. The concept of commemorative integrity was first developed for the 1990 State of the Parks Report, as a framework to evaluation and reporting. This definition has since been integrated into Parks Canada Agency policy.

[4]   These 60 national historic sites include 3 targeted for maintenance or improvement of built heritage, 9 for objects and 12 with archaeological resources, as well as 6 where assessments of interventions are to be completed. An additional 30 national historic sites not owned or administered by the Agency are included in the target with maintenance or improvements expected as a result of Parks Canada's National Historic Site Cost-Sharing Program (excluded from scope of evaluation).

[5]   For the purposes of this evaluation, we consider this to be limited to those national historic site assets specifically coded as being of "national significance" or "other heritage value" (i.e., to PA2) in the Agency's asset management systems.

---

---

**Parks Canada Cultural Resource Management Policy (2013)**

**Objective:** To ensure that cultural resources administered by Parks Canada are conserved and their heritage value is shared for the understanding, appreciation and enjoyment of present and future generations.

**Expected Results:**
- Identification of cultural resources and their character-defining elements that convey the heritage value of Parks Canada's protected heritage places.
- Sustainable conservation of cultural resources, based on priorities and recognized conservation standards.
- Effective integration of cultural resource management, visitor experience and external relations programs and initiatives, as well as other Agency priorities and programs.
- Consistent approach to cultural resource management practices, based on common processes and clear accountabilities.
- Sharing heritage value of protected places in support of Agency objectives for visitor experience and public appreciation and understanding.

---

## 2.2    ACTIVITIES AND OUTPUTS

The Agency's current Cultural Resource Management Policy outlines three broad activities: 1) identification and evaluation of cultural resources; 2) management of cultural resources; and 3) sharing heritage value. The first two activities are considered to be part of the National Historic Site Conservation Sub-program, and are briefly described below. While effective communication of the reasons for designation is a key condition for the commemorative integrity of national historic sites, this activity is the responsibility of the National Historic Site Visitor Experience sub-program.[6]

### 2.2.1    IDENTIFICATION AND EVALUATION OF CULTURAL RESOURCES

Drawing from advice provided by the Historic Sites and Monuments Board of Canada at the time of designation, Parks Canada requires that a Commemorative Integrity Statement be prepared for all national historic sites administered by the Agency. These statements describe what constitutes the commemorative integrity of the site (i.e., the delineation of the place, the reason for its designation, its cultural resources and their heritage value). The Commemorative Integrity Statement provides a baseline reference to help Parks Canada set priorities for managing the site, sharing its heritage value and assessing the impact of interventions.

Known resources within a national historic site must be evaluated to determine if they are cultural resources. Parks Canada categorizes these resources in terms of whether they are 'cultural resources of national historic significance' (i.e., have a direct relationship with the reasons for designation of a national historic site) or 'cultural resources of other heritage value'.[7] Identifying the heritage value ascribed to a cultural resource is a key requirement of the Cultural Resource Management Policy as it guides conservation efforts and investments.

---

[6]    More information on the Agency's objectives and performance for 'Sharing Heritage Value' is found the Evaluation of Parks Canada's National Historic Site Visitor Experience (2017).

[7]    While not linked to the national significance of a national historic site, cultural resources of other heritage value still relate to important aspects of human history or the cultural significance of a Parks Canada site.

---

2.2.2    MANAGEMENT OF CULTURAL RESOURCES

The management of cultural resources includes:

1. **Setting priorities for management:**  Major planning processes for national historic sites take place at the strategic (e.g., corporate investment planning), site (e.g., management planning), and individual project levels. These planning processes guide day-to-day decision-making, priorities for management of and investment in cultural resources. Consistent with the Cultural Resource Management Policy's principle of sustainable conservation, conservation decisions and actions must be prioritized in consideration of the financial and human resources available. Decision-making should give primary consideration to conservation of heritage value, particularly related to cultural resources of national significance.

2. **Conservation and maintenance:**  Conservation and maintenance of cultural resources are key activities for the sub-program, essential to ensuring the preservation of Parks Canada's cultural resources for present and future generations. Conservation efforts focus on the heritage value and character-defining elements of a cultural resource (see definitions in text box). Conservation activities directed at cultural landscapes, archaeological sites, buildings, and engineering works are guided by the Standards and Guidelines for the Conservation of Historic Places in Canada (2010). Guidelines for the conservation of historical objects are discussed in section 4.2.3.

---

**Conservation**: All actions or processes aimed at safeguarding the character-defining elements of a cultural resource to retain its heritage value. This may involve preservation, rehabilitation, restoration or a combination of approaches.

**Maintenance**: Routine, cyclical, non-destructive actions necessary to ensure the preservation of a cultural resource (including landscape features) and slow its deterioration. It includes periodic inspection, cleaning, minor repair and refinishing operations, and replacement of damaged or deteriorated elements that are impractical to save.

**Heritage Value**: the aesthetic, historic, scientific, cultural, social or spiritual importance or significance for past, present or future generations. This value is embodied in a resource's character-defining elements.

**Character-Defining Elements**: the materials, forms, location, spatial configurations, uses and cultural associations or meanings that embody the heritage value of a cultural resource, which must be retained to preserve that value.

---

3. **Assessing impacts of interventions to cultural resources:** Parks Canada encourages the consideration of various uses of cultural resources, in ways that support conservation and long-term enjoyment. A change in use that may affect the heritage value of a cultural resource – from use of objects for visitor experience to adaptive re-use of buildings – must be subject to an assessment of the impact of the intervention to determine how the heritage value and character-defining elements will be affected, and how any adverse effects might be mitigated. The level of effort and detail of the assessment must reflect the potential severity and complexity of the likely adverse effects and the heritage value of the affected resources.

4. **Monitoring and reporting on the condition of resources:**  Monitoring the condition of national historic sites as a whole and related cultural resources provides Parks Canada with necessary information to make informed decisions. According to the Cultural Resource Management Policy,

monitoring must focus on cultural resources of national historic significance, critical character-defining elements that ensure commemorative integrity, and specific considerations such as management priorities, threats to cultural resources and effectiveness of mitigation actions. Commemorative Integrity Assessments are an important element in the management cycle for national historic sites that contribute to assessments of the state of the site. The results from individual site assessments have also been rolled-up to provide an overall indication of the state national historic sites for the Agency's periodic State of Protected Heritage Places Reports. More details on Commemorative Integrity Assessments are found in section 4.2.1.3.

5. **Maintaining records and documentation:** Cultural resource management requires knowledge and understanding of cultural resources, of their history (including past interventions and conservation efforts), current condition, and evolving importance to Canadians. Records and documentation preserve the information necessary for effective decision-making and for sharing the heritage value of cultural resources with Canadians. Under the Cultural Resource Management Policy, cultural resources must be recorded and documented to preserve a public record, particularly in cases of potential loss due to human or natural forces and when long-term stabilization or in-situ preservation are not possible. Records and documentation essential to the understanding of cultural resources and key decisions about them must be maintained, accessible and up-to-date.

## 2.3    RESOURCES (INPUTS)

### 2.3.1    BUDGET AND EXPENDITURES

The National Historic Site Conservation sub-program is funded through both general appropriations (A-Base) and special purpose funds. For the period under evaluation, the sub-program represented a moderate expenditure by the Agency (estimated 6% of the Agency's expenditures). From 2012-13 to 2015-16, average annual expenditures on the sub-program were reported to be about $43M. For 2016-17, the Report on Plans and Priorities shows an increase in budgeted expenditures to $83M. This increase is mostly due to the addition of special purpose funds the Agency received under the Federal Infrastructure Investment Program. More details on budgets and expenditures are found in section 4.3.1.

### 2.3.2    HUMAN RESOURCES

From 2012-13 to 2013-14, there was a significant reduction in the number of full-time equivalents dedicated to the sub-program. Since this time, data indicates that staffing levels have remained relatively stable at close to 170 full-time equivalents. More details on the allocation of staff are presented in section 4.3.2.

## 2.4    ROLES AND RESPONSIBILITIES

Accountabilities for cultural resource management are outlined in the Cultural Resource Management Policy (2013). However, recent changes to the Agency's organizational structure mean that some roles have been redefined.

The Cultural Resource Management Policy gives the functional lead for cultural heritage to the Heritage Conservation and Commemoration Directorate. In April 2016, this entity became the Indigenous Affairs and Cultural Heritage Directorate. The Vice-President, Indigenous Affairs and Cultural Heritage is now

accountable for interpreting policy and providing policy advice and relevant expertise, support and tools to field units to meet their cultural resource management accountabilities. This Vice-President is also responsible for monitoring the effectiveness of, and compliance with, the Cultural Resource Management Policy.

Within the Indigenous Affairs and Cultural Heritage Directorate, there are currently three branches with a key role in national historic site conservation, each with its own Director and supported by a team of managers. These are: 1) Cultural Heritage Policies Branch; 2) Archaeology and History Branch; and 3) Collections, Curatorial and Conservation Branch. This structure was last revised in April 2015.

Since April 2016, the Senior Vice-President, Operations, along with Parks Canada's five Executive Directors have had a critical role in providing leadership for the National Historic Site Conservation sub-program at the operational level. Field Unit Superintendents are accountable for ensuring that the requirements of the Cultural Resource Management Policy are applied to all cultural resources and protected heritage places under their management. Further, they must ensure that all planning and reporting includes consideration of cultural resource management issues and set priorities for the management of and investment in cultural resources at protected heritage places consistent with the Cultural Resource Management Policy. Under the Cultural Resource Management Policy, a member of the management team within each field unit should be assigned as the lead for cultural resource management issues. However, the actual composition of responsible staff differs with the operational requirements of the field unit and there is no consistency in how these positions are distributed.

The Vice-President, External Relations and Visitor Experience, is accountable for ensuring that requirements of the Cultural Resource Management Policy are applied to visitor experience and external relations activities at national historic sites, including monitoring and reporting on requirements related to the sharing of heritage value.

The Vice-President, Protected Areas Establishment and Conservation, is accountable for ensuring that the requirements of cultural resource management policies are followed in relation to relevant policies and programs in national parks, national marine conservation area and Rouge National Urban Park.

The Chief Administrative Officer is accountable for ensuring that cultural resource management requirements are integrated into all planning and reporting areas, including investment planning.

## 2.5   REACH

The conservation of national historic sites is intended to benefit the understanding, appreciation and enjoyment of all Canadians, both present and future. While national historic sites are also a platform for the Agency's interactions with Canadians, for the purposes of this evaluation we consider these interactions to be part of the reach of the National Historic Site Visitor Experience sub-program.

The National Historic Site Conservation sub-program works with a variety of partners and stakeholders to facilitate the conservation and maintenance of cultural heritage. These include:

- Private, governmental and non-governmental groups involved nationally and locally as advocates for or that benefit from the protection of cultural resources. This includes other federal government departments and other levels of government with whom the Agency collaborates to manage specific

sites (e.g., Province House National Historic Site)[8] and to deliver on contracted conservation and maintenance activities (e.g., Public Services and Procurement Canada).

- Indigenous groups and other communities with a direct relationship and/or attachment to specific national historic sites. The integration of traditional indigenous knowledge into planning and management activities is critical to the Agency's cultural resource conservation work. Indigenous consultations may also be required prior to project approval.
- Researchers with an interest in the history of Canada. The Agency permits researchers to conduct research related to national historic sites and archaeological sites and benefits from their findings.

## 2.6   LOGIC MODEL

The logic model showing the relationships between inputs (i.e., human resources and expenditures), activities, outputs and reach, and intermediate and long-term outcomes is shown in Table 2. The logic model provides a visual summary of the program description.

---

[8]    Province House National Historic Site is also the provincial legislature building in Charlottetown, Prince Edward Island.

**Table 2. Logic Model for the National Historic Sites Conservation Sub-Program**

| **Strategic Outcome**: Canadians have a strong sense of connection, through meaningful experiences, to their national parks, national historic sites and national marine conservation areas and these protected places are enjoyed in ways that leave them unimpaired for present and future generations. | | |
|---|---|---|
| **Inputs** | • Financial Resources (average of $43M per year between 2012-13 and 2015-16).<br>• Human Resources (172 full-time equivalents in 2015-16).<br>• Assets (built assets at national historic sites, archaeological sites, historical and archaeological objects, collections facilities). | |
| **PCA Activities** | **Identification of Cultural Resources**<br>• Inventory cultural resources.<br>• Evaluate cultural resources to determine heritage value.<br>• Prepare Commemorative Integrity Statements for national historic sites. | **Management of Cultural Resources**<br>• Develop policy instruments.<br>• Set priorities for management and investment.<br>• Monitor and report on state of commemorative integrity at national historic sites. | **Conservation and Maintenance**<br>• Assess interventions to cultural resources.<br>• Conserve and maintain built heritage assets.<br>• Conserve and manage collections.<br>• Conserve archaeological sites. |
| **Outputs** | • Commemorative Integrity Statements.<br>• Cultural resource records, documentation and databases. | • Cultural resource management policies, directives and guidance.<br>• National historic sites management plans/statements<br>• Assessments of commemorative integrity of national historic sites.<br>• Reports on the "State of" national historic sites. | • Cultural Resource Impact Analyses.<br>• Cultural resource condition assessments.<br>• Conservation and maintenance work.<br>• Plans to address maintenance and/or deferred work.<br>• Collections management activities and facilities monitoring. |
| **Reach** | • Canadians, both present and future.<br>• Private, governmental and non-governmental groups that advocate for or benefit from the protection of cultural resources.<br>• Indigenous groups and communities with a direct relationship and/or attachment to specific national historic sites.<br>• Researchers with an interest in the history of Canada. | |
| **Immediate Outcomes** | • Interventions likely to impact on cultural resources are assessed and mitigated.<br>• Condition of built assets at national historic sites is maintained or improved.<br>• Condition of historical and archaeological objects is assessed and maintained.<br>• Threats to archaeological sites are assessed and reduced. | |
| **Long-Term Outcomes** | • Cultural resources administered by the Agency are conserved in a sustainable manner.<br>• National historic sites administered by Parks Canada are managed in ways that leave their commemorative integrity unimpaired. | |

# 3   EVALUATION DESIGN

## 3.1   EVALUATION PURPOSE AND SCOPE

This evaluation focuses on the National Historic Sites Conservation sub-program of Parks Canada's Program Alignment Architecture (see Appendix A). The evaluation examined the relevance and performance (i.e., effectiveness, efficiency, and economy) of the sub-program, consistent with the requirements of the Treasury Board Policy on Evaluation and related directive (2009). This approach is also consistent with the new Treasury Board Policy on Results introduced in 2016.

This evaluation generally covers the period from fiscal year 2010-11 to 2016-17. Some activities and results that occur outside this period are also considered where relevant.

The scope of the evaluation includes the activities and results of the National Historic Sites Conservation sub-program, with emphasis on sub-program's specific performance expectations related to maintaining or improving the condition of cultural resources that are: (1) built assets at national historic sites, (2) historical and archaeological objects, and (3) archaeological sites. The scope of the evaluation includes all of the Agency's activities to manage these resources, regardless of location. This includes historical or archaeological objects and archaeological sites that are associated with other heritage places (e.g., national parks), including objects they may be housed at a collection facility.

The framework for cultural resource management applies equally to all national historic sites. As such, for most questions, the scope of the evaluation includes all 171 national historic sites owned or administered by the Agency during the period under evaluation. However, analysis for questions related to asset condition and expenditures excludes the Agency's nine heritage waterways and associated sites (i.e., Fort Ste-Thérèse, Peterborough Lift Lock National Historic Site, Mnjikaning Fish Weirs National Historic Site, Merrickville Blockhouse National Historic Sites). At the time of evaluation, coverage of these elements was planned as part of a broader future evaluation of heritage canal management.

The scope of the evaluation also excludes:

- National historic sites administered by other federal departments, other levels of government or those that are privately owned.
- Actions taken to ensure that heritage value of national historic sites is effectively communicated to the public. This element of commemorative integrity is considered in a concurrent evaluation of the National Historic Site Visitor Experience sub-program.

## 3.2   EVALUATION APPROACH AND METHODOLOGY

A detailed matrix of evaluation questions, performance expectations, indicators and relevant data sources is found in Appendix C. Parks Canada evaluation staff conducted the evaluation's field work between September 2015 and September 2016. The findings presented in the evaluation are based on the following five data collection methodologies:

**Document and File Review.** A wide variety of documents was reviewed, including legislation, policies, corporate reports, and program or project-specific documents such as guidelines, tools, research and reported results.

**Database Analysis.** Analysis includes a review of secondary data from Agency sources, including the Agency's financial system, asset system, project tracking system, and program-specific databases.

**Key informant interviews.** Key informant interviews were used to gather information across all the issues of the evaluation. Over 150 individual or group interviews were conducted with Agency personnel at national office and in the field (see field visits, below). We also interviewed external experts (n=11) in heritage conservation.[9]

**Field Visits.** Field visits were conducted to develop a more in-depth understanding of how the sub-program operates at the field level, including the links between activities, outputs and results. In addition to the above mentioned interviews, site visits included a tour of the site to observe and discuss specific conservation issues and recent or planned infrastructure projects.

In total, the evaluation included a site visit to 45 national historic sites spread across 15 field units (see Appendix D). The focus for site selection was on higher-risk or priority sites for the sub-program. Criteria used to select these priority sites include:

- Materiality of expenditures on National Historic Site Conservation (with focus on more material sites);
- Results of past commemorative integrity assessments (with a focus on sites with "poor" commemorative integrity);
- Locations with planned infrastructure investments; and
- National historic sites that contain archaeological sites identified by the Agency as a priority in its Program Management Framework.

Field visits also included a tour of five of Parks Canada's six major collections facilities and visits to sites with major collections (e.g., Dawson Historical Complex, Fortress of Louisbourg National Historic Sites).

**Comparative analysis.** The evaluation team reviewed publicly available documentation to provide an overview of the best practices of national and international benchmarks in conservation and a comparison of other jurisdictions' approaches to collections management. This method also included site visits to provincial and federal museum collections (e.g., Canadian Museum of History, National Archives, Royal Ontario Museum) and discussions with representatives of the United States National Park Service.

## 3.3   EVALUATION STRENGTHS, LIMITATIONS AND MITIGATION STRATEGIES

The evaluation's document review, site visits and interviews enabled an extensive understanding of the National Historic Site Conservation sub-program. Interviews with Parks Canada staff were sufficiently comprehensive to be considered representative of current opinion and perceptions within the Agency. The number and diversity of sites visited by the evaluation team provided a good sample of the range in field-level capacity and delivery of the conservation activities.

Conducting the field work in tandem with the concurrent Evaluation of the National Historic Site Visitor Experience sub-program resulted in significant advantages, particularly related to field visits. This

---

[9]   Where relevant, these interviews covered both the conservation and the visitor experience provided at national historic sites.

allowed the team to maximize the breadth of site visits to gain a more complete awareness of sub-program performance while minimizing costs to the Agency. Of the 45 sites visited, 19 were identified as a priority for the National Historic Site Conservation sub-program. The remainder were either of primary interest to National Historic Site Visitor Experience and/or conveniently co-located sites. Conducting the evaluations concurrently also allowed for a more fulsome view of how these programs interconnect and provided a broader perspective on sub-program delivery.

The evaluation was limited by the quality and consistency of available data. These limitations applied to:

- Cultural Resource Inventory – The Agency currently maintains numerous databases with data on cultural resources. Data quality and accessibility within these databases varies.
- Commemorative Integrity Assessments – The State of Protected Heritage Areas (2011) available during the period of evaluation indicated that there are 28 sites (15% of all national historic sites) that lacked a Commemorative Integrity Assessment. The majority have not yet been subject to a second Commemorative Integrity Assessment, resulting in limited information on trends.
- Asset Data – The Agency's new asset database (MAXIMO) became operational in 2016. During the evaluation period, Field Units were asked to populate and validate important information, but this effort had not been completed as of October 2016. There are some concerns regarding the accuracy of asset condition ratings reported in the system.
- Financial Data – The Agency's financial coding structure changed significantly in July 2014, making it difficult to determine trends in expenditure data. Prior to 2014, it is also difficult to isolate expenditures specific to cultural resource management at national historic sites.
- Program Records – Issues with program record keeping delayed data collection for the evaluation. This includes records that could not be located or accessed, records that were provided in unusable formats, and records that were repeatedly revised during the examination phase.

Data gaps or inconsistencies were mitigated to the extent possible by triangulation with other information sources. Site visits and file reviews provided supplementary information on the condition and commemorative integrity of specific national historic sites, collection facilities and a comparison to benchmark organizations.

# 4   EVALUATION FINDINGS

## 4.1   RELEVANCE

### 4.1.1   CONTINUED NEED FOR THE NATIONAL HISTORIC SITE CONSERVATION SUB-PROGRAM

| Expectations: | Indicators: |
|---|---|
| • The sub-program addresses a continued identified need.<br>• The sub-program is responsive to the needs of Canadians. | • Reported threats to the condition and commemorative integrity of national historic sites.<br>• Evidence of Canadians' support for national historic site conservation. |

**There is a continued need for the sub-program.**

Parks Canada acts as a steward for more than 17% of Canada's national historic sites and an important number of historical and archaeological objects and archaeological sites. These cultural resources are considered to be unique and irreplaceable. However, they are also at continual risk of decline. Besides the age of infrastructure, key threats affecting the condition of historic structures, landscapes and objects can be divided into two groups:

- Natural Processes – Physical forces such as water, soil erosion, pest infestations, vegetation growth, fire, and natural disasters. Climate change effects (e.g., permafrost melt, sea level rise, extreme weather events) are becoming more pronounced.
- Human Action – Threats from human action can relate to deficiencies in specific management practices (maintenance, security or environmental controls), to impacts from visitors, operations or infrastructure works, or to external development pressures.

It is generally agreed that such threats should be mitigated to the extent possible to ensure the preservation of cultural resources for present and future generations.

**The sub-program is responsive to the needs of Canadians.**

Canada's national historic sites are considered to be a living legacy for all Canadians. In 2001, a Heritage Canada Foundation survey found that about 90% of Canadians see heritage conservation as crucial to our national culture and identity. Commemoration is said to foster knowledge and appreciation of Canada's past and to promote community pride, provide opportunities to celebrate the past, and contribute to building and sharing Canadian identity. Conservation of natural and cultural resources within these places helps ensure that they are available for both current and future generations.

Survey research has shown that the majority (86%) of Canadians have an interest in Canada's past (see *Canadians and Their Pasts*, 2013). In 2014, Parks Canada's National Survey of Canadians found that 44% of Canadians believed that protecting historical buildings, artifacts and places from damage and loss was the most important reason for the creation of Canada's national historic sites. Canadians also perceived these sites as playing an important role in honouring important events, people and places in Canada's history. A majority of Canadians indicated that knowing that national historic sites exist is important, even if they never have the opportunity to visit them (72%) and that these sites are meant to be enjoyed by future generations as much as by people today (66%).

4.1.2    ALIGNMENT WITH GOVERNMENT OF CANADA AND AGENCY PRIORITIES

| Expectations: | Indicators: |
|---|---|
| • Sub-program objectives align with Government of Canada priorities.<br>• Sub-program objectives align with Parks Canada Agency's priorities. | • Degree to which sub-program aligns with Government of Canada Whole of Government Framework.<br>• Degree to which sub-programs align with Parks Canada Agency's priorities. |

**The sub-program is aligned with Government of Canada priorities.**

The National Historic Sites Conservation sub-program is consistent with priorities in the federal government's Whole of Government Framework (i.e., high-level outcome areas defined for the government as a whole). This sub-program is principally tied with the outcome area of "A vibrant Canadian culture and heritage."

The sub-program also contributes to Canada's international commitment in the United Nations' Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), where member states recognize their duty to identify, protect, conserve, present and transmit these resources to future generations (Article 4).

**The sub-program is aligned with Parks Canada Agency priorities.**

Conservation Gains, including ensuring commemorative integrity, is an ongoing organizational priority for Parks Canada. The National Historic Site Conservation sub-program is aligned with the Agency's Strategic Outcome, i.e., to ensure protected places are left "unimpaired for the enjoyment of present and future generations." The National Historic Site Conservation sub-program is also linked to more recent priorities for addressing the Agency's backlog of deferred infrastructure work. Actions against these priorities aim to mitigate some of the key corporate risks identified in the period, i.e., environmental forces (e.g., impacts of climate change and erosion), natural disasters, and challenges with asset management.

4.1.3    ALIGNMENT WITH FEDERAL ROLES AND RESPONSIBILITIES

| Expectations: | Indicators: |
|---|---|
| • The sub-program is aligned with Parks Canada Agency's legislative and policy mandate. | • Federal legislation, policies and directive indicate relevant roles and responsibilities.<br>• Parks Canada Agency mandate, policies and directives indicate relevant roles and responsibilities. |

Parks Canada's responsibilities for the sub-program, particularly for ensuring the commemorative integrity of national historic sites, are outlined in relevant federal legislation and regulations (i.e., *Parks Canada Agency Act, Historic Sites and Monuments Act,* and *Canada National Parks Act*). For example, Parks Canada is designated as the federal authority on archaeology under the *Parks Canada Agency Act*. Parks Canada's Charter also commits the Agency "to protect, as a first priority, the natural and cultural heritage of our special places and ensure that they remain healthy and whole."

In part, the Agency's ability to maintain or improve the commemorative integrity of its national historic sites depends on the consistent application of its approach to cultural resource management across the system. While all national historic sites are of equal importance to the history of Canada by virtue of their designation, they are not all subject to the same legislative and regulatory requirements. Designation as a National Historic Site of Canada provides no legal protection to the historic elements of a site. Within Parks Canada's inventory (n=171), only 81 national historic sites (47%) are protected under the *Canada National Parks Act*.[10] The remaining national historic sites owned and/or administered by Parks Canada are not subject to the Agency's key regulatory tools. These sites may be subject to additional legislative requirements given their specific context (e.g., *Laurier House Act, Heritage Lighthouse Protection Act*) but most depend on provincial legislation (e.g., trespass laws) to protect resources.

While past commitments to consolidate legislation have never been fully realized, we found that the resulting real or perceived risks to national historic sites (e.g., inconsistent application of regulatory tools) are mitigated by a number of Government of Canada and Parks Canada policies, directives and guidelines that specify how the Agency manages the cultural resources under its stewardship.[11] Parks Canada applies these policies equally to all of its protected heritage areas, regardless of legislative and regulatory requirements.

**Key tools to support implementation of the Cultural Resource Management Policy are still missing.**

The 2013 revisions to the Cultural Resource Management Policy took a positive step in this direction, by making specific requirements for cultural resource management explicit (rather than implied) and by introducing clear accountabilities and consequences. However, recognizing that policy revisions alone would not ensure success, the Agency intended to supplement the policy with a series of guidelines supporting its interpretation and implementation. Some guidelines already existed and would continue to be applied (e.g., Standards and Guidelines for the Conservation of Historic Places in Canada); others were to be developed. These included:

- Guide on Identifying Cultural Resources through Evaluation
- Guidelines on Assessing the Impacts of Interventions to Cultural Resources
- Guidelines for Monitoring the Condition of Cultural Resources
- Guide on Setting Management Priorities for Cultural Resources
- Guidelines on Conservation of Objects

To date, only the first two of these tools have been completed and communicated to staff. The Guidelines for Monitoring the Condition of Cultural Resources was in draft and expected to be completed by the end of 2017-18. No additional progress has been reported to support the latter two guides. While directives exist to provide specific guidelines on maintenance and care of objects, these are now significantly outdated and have been identified by the program as requiring an update. At present, the Agency relies on international and national standards for object conservation (e.g., Code of Ethics and Guidance for Practice endorsed by the Canadian Association for Conservation of Cultural Property and the Canadian Association of Professional Conservators). However, these standards do not

---

[10]   These are either directly protected under the National Historic Sites of Canada Order (n=53), or by nature of being located within the boundaries of a gazetted national historic site (n=6) or national park (n=22).
[11]   Policies, directives and guidelines are referenced as relevant in this report.

fully address the question of heritage value which is at the base of the Agency's cultural resource management.

Further, while some direction for terrestrial archaeology is provided in federal policies and guidelines, many of these sources are now outdated. The Government of Canada's Archaeological Heritage Policy Framework was last updated in 1990. Parks Canada's own Guidelines for the Management of Archaeological Resources (2005) are no longer aligned with the Agency's Cultural Resource Management Policy (2013) or its current organizational structure.

Underwater archaeological resources may be the most significantly impacted by this gap. While the *Canada Shipping Act* (2001) provides for the regulation of heritage wrecks (ships and aircraft), related regulations have yet to be developed.[12] This leaves heritage wrecks in Canadian waters – such as the HMS Terror, HMS Investigator and various wrecks in Fathom Five National Marine Park and Lake Superior National Marine Conservation Area – exposed to legal commercial salvage, regardless of their historical significance. Salvagers of heritage wrecks must report the discovery but are generally entitled to keep what they have recovered. The absence of such regulations also prevents Canada from ratifying the United Nations Convention on the Protection of the Underwater Cultural Heritage, which would enhance the international protection of these resources.

**This issue is addressed by Recommendation 1.**

## 4.2    PERFORMANCE: OUTPUTS AND OUTCOMES

The following discussion of outputs and outcomes has been divided into four sections, related to the management of (1) national historic sites, (2) the heritage buildings and engineering works associated with these places, followed by a discussion of the broader management of (3) historical and archaeological objects and (4) archaeological sites.

### 4.2.1    NATIONAL HISTORIC SITES

An important part of Parks Canada's mandate involves protecting the health and wholeness, or commemorative integrity, of the national historic sites it operates. This means preserving the site's cultural resources, communicating its heritage values and national significance, and kindling the respect of people whose decisions and actions affect the site.

The evaluation examined four outputs critical to the national historic site conservation management cycle. The Agency's Directive on Management Planning and Reporting (2013) indicates that management planning and reporting should be completed as an iterative, ten-year cycle. All national historic sites should regularly monitor management plan implementation.[13] Towards the end of the cycle, national historic sites that require a management plan should use this monitoring data to also complete a State of the Site Assessment. To ensure a State of Site Assessment is based on the most

---

[12]    Under the *Canada Shipping Act*, the Minister of Transport (responsible for navigation) and the Minister of the Environment (responsible for Parks Canada, and by extension federal archaeology) must jointly recommend regulations specifying wreck or classes of wreck that have heritage value.

[13]    National historic sites that require a management plan must also complete an Annual Implementation Update, i.e., a brief written summary of progress on plan implementation (e.g., newsletter, deck) which can be shared with partners and stakeholders. Adherence to this requirement was not examined as part of this evaluation.

recent data available, sites are encouraged to either undertake a full Commemorative Integrity Assessment or an update if only one component has undergone any significant change. This report is then used to inform the next round of management planning. These outputs are linked such that if one is missing or absent for a particular national historic site, the others may also be deficient.
The evaluation also examined the extent to which the overall commemorative integrity of national historic sites is being maintained or improved. Observations related to each output and outcome are detailed below.

### 4.2.1.1    Commemorative Integrity Statements

| Expectations: | Indicators: |
|---|---|
| • All national historic sites have an approved Commemorative Integrity Statement. | • Number of national historic sites with an approved Commemorative Integrity Statement. |

Commemorative Integrity Statements are used by Parks Canada to identify what constitutes the commemorative integrity of a national historic site, in particular its heritage value and cultural resources (of national historic significance and other heritage value), and to help managers set priorities for their management. While this tool has been in use by Parks Canada since 1995, explicit requirements to develop and maintain a CIS for each national historic site administered by the Agency were only recently introduced (Cultural Resource Management Policy, 2013). These documents should be created in accordance with Parks Canada's 2002 Guide to the Preparation of Commemorative Integrity Statements. The process includes controls to ensure these guidelines are followed.

Data from November 2017 indicates that a Commemorative Integrity Statement had been approved for 142 of the Agency's 171 national historic sites, with an additional eight in progress. Program managers confirmed that there is no plan to develop a Commemorative Integrity Statement for 18 of the national historic sites.[14] Reasons for this decision varied with context of the individual site but include:

• The site is part of a larger national historic site for which a Commemorative Integrity Statement has already been completed;
• There are no known cultural resources associated with the designation;[15]
• Parks Canada does not own the designated place,[16] or owns a very small area of a larger site; and
• Consultations with regards to Commemorative Integrity Statements development have been put on hold or require relationship building with local First Nations.

If a Commemorative Integrity Statement has not been completed or if a potential cultural resource (such as an in-situ archaeological resource) was not properly evaluated, the Cultural Resource Management Policy directs that an evaluation must be completed before taking any decision or action that could have an adverse impact on the resource. There is thus a small risk that the absence of a clear, complete commemorative integrity statement could create some inefficiencies for site management.

---

[14]   Three national historic sites have been recommended to develop a Commemorative Integrity Statement; decision is pending.

[15]   For example, the designation of the Mississauga Point Lighthouse National Historic Site refers to the "symbolic significance of the vanished lighthouse." While archaeological remains are believed to be situated below what is now the Fort Mississauga National Historic Site, no known evidence survives.

[16]   The sub-program includes national historic sites owned and/or administered by Parks Canada. There are a limited number of sites administered but now owned by the Agency (e.g., Bloody Creek National Historic Site).

**There may be a need to update some commemorative integrity statements.**

There is no requirement to update a commemorative integrity statement once it is approved nor is a review process built into related guidance. As a result, most Commemorative Integrity Statement have never been updated. The approval date for 97% of these statements is before 2010.

While these commemorative integrity statements are static in time, history and our knowledge or interpretation of it continues to evolve. Program and site managers indicated that there may be a need to update the Commemorative Integrity Statement for several sites. For example, particularly given the federal government's priority for reconciliation, some sites noted that their Commemorative Integrity Statement should be updated to better reflect the history of Indigenous peoples. While revisions to the Cultural Resource Management Policy added flexibility for interpretation, allowing for stories not identified in the Commemorative Integrity Statement to be presented, priority for protection of cultural resources continues to be given to those linked to the stated commemorative integrity of the site. As a result, managers at some sites where the approved Commemorative Integrity Statement is narrowly focused on the reason for designation (e.g., a specific battle) indicated concern that resources related to the broader history of the site may not be given adequate priority for management or investment.

### 4.2.1.2 Management Plans

| Expectations: | Indicators: |
|---|---|
| • Management plans / statements have been developed for all national historic sites. | • Number of national historic sites with an up-to-date management plan/statement. |

The requirement to develop and maintain management plans for Parks Canada's heritage places stems from the *Parks Canada Agency Act* (s. 32). As of September 2016, data suggests that management plans or statements were in place for about 82% of national historic sites.[17] We estimate that about 70% of these documents are outdated (i.e., more than 10 years old). However, we were not provided with all the management plans completed by the program. Data reliability issues in the Agency's tracking system for management plans prohibits more decisive estimates.

Parks Canada has developed a ten-year schedule (2014 to 2024) which shows that all national historic sites administered by the Agency are expected to have an up-to-date management document in place by 2022. While recently designated sites (e.g., Wrecks of the HMS Erebus and HMS Terror National Historic Sites, Maligne Lake Guest House National Historic Site) are not yet listed on this schedule, by legislation they would also need to have a management plan in place within the next five years.

During the period under evaluation, requirements for management planning underwent significant changes. In 2012, legislative amendments moved the period for review of management plans from a five-year to a ten-year cycle. The Agency also introduced a new Directive on Management Planning and Reporting (2013) that further streamlines requirements for management planning based on the

---

[17]    The list of sites missing a management document is roughly aligned with the list of sites for which there is no plan to develop a commemorative integrity statement.

management complexity of a site. National historic sites considered to have high or moderate management complexity (n=76) continue to require a five- to fifteen-page management plan, while the remainder (n=92) are considered to have limited management complexity and will only require a one-page management statement.[18]

Most interviewees described management plans as important guiding documents. These plans set out long-term strategic management direction, including measurable objectives and targets, with the broad objective of ensuring integrated delivery of the Agency's mandate for both protection and public understanding and enjoyment at each national historic site. However, staff in many field units noted that they are challenged to maintain management plans without the support of a management planner. While acknowledging that the previous approach to planning was not sustainable, some interviewees also questioned the extent to which clear direction could be provided by the newly streamlined management documents (particularly one-page management statements). They noted that the move to a ten-year planning cycle created risks for the Agency given the changes in condition and priorities that could occur over this extended period.

### 4.2.1.3　Commemorative Integrity Assessments

| Expectations: | Indicators: |
|---|---|
| • Commemorative integrity of national historic sites has been assessed. | • Number of national historic sites where commemorative integrity has been assessed and/or re-assessed.<br>• Perspectives on quality of assessments.<br>• Evidence of plans to complete assessments, where required. |

Parks Canada determines the state of commemorative integrity at a national historic site by completing a Commemorative Integrity Assessment, comparing the desired state of the site (identified in the commemorative integrity statement) to the actual state. These assessments are designed as a questionnaire in three sections, paralleling the three parts of the definition of commemorative integrity. In each of these three sections, indicators are rated based on a good–fair–poor system. These ratings are rolled up into overall ratings for each component and for the site as a whole (i.e., a numerical score from one to ten, where ten is 'no impairment' and one is 'severe impairment').[19] This process is intended to produce consistent, reliable, and comprehensive information about the state of the sites administered by Parks Canada.

The Agency piloted its first assessments of commemorative integrity at eight sites in 1997.[20] In 2001, the Agency implemented a ten-year schedule (2001 to 2011) to establish a baseline understanding of the state of commemorative integrity at all national historic sites administered by Parks Canada. This

---

[18]　Sites with limited management complexity administered by Parks Canada can be non-operational or have a minimal visitor service offer (e.g., The Forks National Historic Site, Battle of the Windmill National Historic Site) or are operated by a third party (e.g., Dalvay-by-the-Sea National Historic Site). In total, 12 national historic sites on List 2 of the Directive on Management Planning and Reporting have a management statement that must be tabled in Parliament.

[19]　See Appendix E for outline of indicators used in commemorative integrity assessments and Appendix F for updated definitions of resource condition.

[20]　From 1997 to 2012, these assessments were referred to as 'Commemorative Integrity Evaluations'.

schedule covered 134 national historic sites (about 80% of Parks Canada administered sites). Over this period, the Agency exceeded its target with a baseline assessment completed at 135 national historic sites. Again, we found that the list of sites not scheduled for assessment was roughly aligned with the list of sites lacking a Commemorative Integrity Statement.

Baseline assessments were typically carried out over a two-day period, at the site, with participation from site staff, professional staff familiar with the site (for example, archaeologists and historians), and three staff from elsewhere in the Agency. While these assessments mostly relied on the knowledge and professional judgement of participants to present the Agency's self-assessment of the integrity of a site, in some cases, external partners and stakeholders were also invited to participate. The resulting assessments were perceived to be useful in identifying issues impacting the state of commemorative integrity at specific national historic sites.

**Challenges in streamlined Commemorative Integrity Assessment process .**

In 2012, all new assessments were put on hold to allow for revisions to the process intended to realign elements with the revised Cultural Resource Management Policy (2013). Senior management also indicated that the assessment process needed to be streamlined given resources available following Agency-wide budget reductions.

An updated process was introduced in 2013.[21] Since 2014, 12 national historic sites have been assessed under the new process (complete or in draft). Our evaluation identified a number of issues related to methodological changes in the new approach that reduce comparability to previous results and weaken the level of confidence in ratings assigned. These include:

- **Reduced coverage of assessment.** Only the 73 national historic sites that require a management plan will be required to complete the revised assessment (i.e., about 43% of sites).
- **Reduced frequency of assessment.** Linked to the schedule for management planning, it is envisioned that assessments will now be completed on a ten-year cycle. Program managers and site staff indicated that, for some sites, this interval may be too long and could reduce opportunities for interventions to cost-effectively or successfully mitigate threats to the integrity of sites. Sites with "poor" ratings were previously to be re-assessed once every five years (see section 4.2.1.5). This risk is mitigated to some extent by informal monitoring that occurs in the interval between formal assessments.
- **Streamlined participation.** While assessments are still to be completed by a team of field unit and Indigenous Affairs Cultural Heritage Directorate representatives, there is no longer a requirement for external participation from staff or stakeholders. There is a risk that this will reduce the objectivity and national consistency of the ratings, particularly given the relative lack of expertise in cultural resource management that currently exists at the field level (see section 4.3.2). The lack of broader staff participation also reduces opportunities to share best practices and lessons learned from site-to-site, recognized as an important unintended benefit of the previous methodology.
- **Increased reliance on program databases.** While larger or more diverse sites may still be the subject of an on-site assessment, in most cases details on current resource condition are now to be drawn where available from existing Parks Canada databases. Only resources of national significance and

---

[21]    From 2013 on, these assessments have been referred to as 'Commemorative Integrity Assessments'.

"key" resources of other heritage value administered by Parks Canada are to be assessed.[22] This approach assumes that internal data systems provide comprehensive, accurate and up-to-date data on the condition of resources, which is currently not the case (see section 4.2.2.1 and 4.2.3.1). The older or less reliable the data in the system of record, the lower the confidence in the results of the assessment.

- **Change to indicators for 'Effectiveness of Communications'**. Initial assessments of the effectiveness of communications required a detailed review of the site's communication program (e.g., personal and non-personal interpretation). Revised ratings are now to be derived exclusively from visitors' responses to two questions in periodic visitor surveys administered by the Agency that focus on whether the visitor has (i) learned something about the cultural heritage of the place and (ii) an understanding of the contribution of the place to the history of Canada. There are two key concerns with this approach. First, while considering visitors' self-assessment of learning is consistent with revisions to the Cultural Resource Management Policy (i.e., acknowledges that while the Agency must provide opportunities for understanding the significance of a site, there are many different ways to enjoy and appreciate a protected heritage place), it provides limited information on the integrity, clarity or balance of the messages being shared. Second, the ability to rate these indicators is limited to the 29 national historic sites that are scheduled to conduct a 'core' version of this visitor survey.[23] This means that a critical element of commemorative integrity will not be assessed for about 60% of the sites that are required to complete a Commemorative Integrity Assessment (or 83% of all sites).

- **Change to indicators for 'Management Practices'.** Both the previous and revised 'Management Practices' component of the assessment process included a similar survey of common threats to historic sites from natural processes and human actions, and the effectiveness of the Agency's response to these threats. However, while the revised assessment process assigns a score against these threats, it no longer requires a review of select management practices outlined in the Cultural Resource Management Policy (e.g., inventory of resources, records management, etc. - see Appendix E).

**This issue is addressed by Recommendation 3.**

**Comparison to framework for monitoring ecological integrity.**

A review of existing literature found that other organizations engaged in cultural resource conservation are also challenged to find objective, sustainable performance measures. However, several senior managers we consulted stressed the important contrast between the Agency's process for Commemorative Integrity Assessments and its framework for monitoring ecological integrity. While both processes are designed to monitor the state and trend of sites, the level of resources and expertise

---

[22] Criteria to determine "key" resources include: the resource's contribution to the visitor experience, ease of access by the visitor to the resource, local community importance placed on the resource, a resource that is rare or unique, and field unit management priorities.

[23] In 2013, the Visitor Information Program was divided into two components – the Visitor Information Program Core and the Visitor Information Program Lite. While there are an additional 43 national historic sites that are scheduled to conduct a mandatory or optional Visitor Information Program Lite, the Agency's Social Science Branch has advised the Indigenous Affairs Cultural Heritage Directorate that the results of these surveys will not be sufficiently robust to provide reliable information for Commemorative Integrity Assessments.

dedicated to ecological integrity monitoring is significantly higher than that dedicated to commemorative integrity assessments, as is the level of coverage and frequency of assessment (i.e., ecological integrity monitoring involves frequent measures taken in all national parks). While the rate and complexity of change in most national historic sites likely does not warrant this level of monitoring, the Agency will be challenged to report on the extent to which it has achieved its mandated objective to maintain commemorative integrity without the systematic and consistent collection of up-to-date information for the majority of its sites.[24]

### 4.2.1.4    State of the Site Assessments

| Expectations: | Indicators: |
|---|---|
| • Where required, national historic sites are completing State of the Site Reports. | • Number of national historic sites with an up-to-date State of the Site Report (vs. number required). |

The Agency's Directive on Management Planning and Reporting (2013) indicates that all national historic sites should regularly monitor management plan implementation against a national suite of indicators. Towards the end of the ten-year management cycle, national historic sites that require a management plan should use this monitoring data to also complete a State of the Site Assessment. Field Unit Superintendents are accountable for these monitoring and reporting activities. While there is no requirement to publish or distribute this report externally, the Field Unit Superintendent may share the results at their discretion.

The Agency's template for State of the Site Assessments specifies indicators for cultural resources (n=4) and visitor experience (n=4), including visitor learning. Monitoring data for these indicators is largely derived from assessments of commemorative integrity and visitor surveys. Files provided by the program indicate that at least 25 national historic sites (15%) have completed a State of the Site Assessment since 2011. Data included in these reports is subject to the same limitations as the source assessments from which it is drawn. These gaps undermine the value of these reports.

### 4.2.1.5    Maintaining Commemorative Integrity

| Expectation: | Indicators: |
|---|---|
| • Commemorative integrity of national historic sites is being maintained or improved. | • Assessed commemorative integrity of national historic sites, current status and trend.<br>• Evidence of relevant actions planned/taken to maintain or improve commemorative integrity at national historic sites. |

The objectives of the program for Commemorative Integrity Assessments noted above were two-fold: to better understand the state of commemorative integrity and, based on that understanding, to improve it. In 2008, the baseline information collected from the initial round of assessments fed into a new

---

[24]    In past reports, the Office of the Auditor General has emphasized the importance of reporting to Parliament on the protection of federal cultural heritage and what is accomplished with related departmental resources. See Office of the Auditor General (November 2003), Chapter 6 - Protection of Cultural Heritage in the Federal Government; OAG (February 2007), Chapter 2 - The Conservation of Federal Built Heritage.

corporate target for Parks Canada – to improve the Agency's overall average commemorative integrity rating from 6.0/10 in March 2008 to 6.6/10 by March 2013.

To support this target, the Agency focused efforts for the sub-program on improving the condition of cultural resources and on management practices elements of commemorative integrity rated as "red" (i.e., poor) in their initial assessment. To measure progress against targeted actions, Parks Canada planned to complete a re-assessment of all sites that earned poor ratings for any element of commemorative integrity once every five years. Using the same methodology as for baseline assessment, re-assessments were completed for 36 national historic sites from 2007 to 2012.

Data reported in the Agency's Departmental Performance Reports suggests that this focus on results was successful, with improvements in the overall state of commemorative integrity exceeding targeted results by the end of 2010-11 (Table 3). When last assessed (2012-13), the overall average rating for the commemorative integrity of Parks Canada's national historic sites was 7.1/10. These rating assumes that national historic sites where the baseline condition was rated as 'good' or 'fair' did not experience a decline in their condition over the period that would affect their commemorative integrity.

**Table 3. Reported Change in Average Commemorative Integrity of Parks Canada's National Historic Sites**

| Year | 2007-08 | 2008-09 | 2009-10 | 2010-11 | 2011-12 | 2012-13 |
|---|---|---|---|---|---|---|
| Average | 6.0 | 6.4 | 6.5 | 6.8 | 7.1 | 7.1 |
| Score (*n = 134*) | (significant impairment) | | | ⟶ | (minor impairment) | |

Source: Parks Canada Departmental Performance Reports, 2007-08 to 2012-13

With achievement of targeted results, in 2012-13, the Agency's objectives shifted to focus on the condition of cultural resources of national significance. While maintaining the commemorative integrity of national historic sites is still a key objective for the Agency, the trend in overall commemorative integrity is no longer reported. Most existing commemorative integrity assessments (≥72%) are more than five years old. As noted above, data reported in future corporate reports will at best only reflect the state of a sub-set of the Agency's national historic sites as many sites are now excluded from ongoing assessment.

### 4.2.2   HERITAGE BUILDINGS AND ENGINEERING WORKS

During the period under evaluation, Parks Canada had ongoing performance expectations to improve the condition of **heritage buildings and engineering works** of national significance administered by the Agency, with a focus on those in poor condition. Given that the scope of these expectations are limited to the built heritage assets found in national historic sites, these were the focus of the evaluation.

Our analysis examined the Agency's progress in this area against three questions, i.e., to what extent is the condition of built heritage assets (1) known, (2) being maintained or improved, and (3) do interventions to built heritage assets respect standards and guidelines for the conservation of cultural resources? Findings related to each of these questions are outlined below.

> **Heritage Building:** fixed structures with an ascribed heritage value capable of containing or sheltering human activities, consisting of an interior space, shell and roof, ascribed heritage value.
>
> **Heritage Engineering Work:** constructions built or sites transformed for purposes other than habitation; they exist primarily to produce goods or provide services for the benefit of human needs. They must have an ascribed heritage value.

**4.2.2.1    Inventory and Condition of Heritage Buildings and Engineering Works**

| Expectations: | Indicators: |
|---|---|
| • The condition of cultural resources at national historic sites is known. | • Condition of cultural resources at national historic sites, current and trend. |

In 2009, an evaluation of Parks Canada's asset management program found that the Agency's asset management system was deficient, with missing, erroneous, or outdated information in mandatory fields for many assets. As a result, it was impossible to address basic questions such as the exact size of the asset inventory or the significance of any observed changes.

Since this time, the Agency has undertaken significant work to improve its knowledge of the built assets it administers. In 2012, the Agency completed a National Asset Review to determine the value of its built asset portfolio (i.e., number of assets, overall asset condition, and estimates of current replacement value and deferred work) and to improve understanding of risks in condition of high risk assets such as highways, bridges and dams. This review estimated the current replacement value of the Agency's entire portfolio of built assets to be in the range of $15B to $16.6B, and the backlog of deferred work to be between $2.6B and $2.8B. Within this portfolio, cultural resources were estimated to have a current replacement value of $1.8B and a backlog of deferred work of $232M.[25]

In 2015, Parks Canada began migration from its existing asset management system software to a new asset database, Maximo. An estimated 90% of data validation and migration was completed by September 2016. Direction for Commemorative Integrity Assessments is clear that the Agency's existing databases (i.e., Maximo) are now to be the primary source of resource condition data for built heritage assets. Where current or relevant information is not available from databases, the field unit will be asked to provide input. Given this, the quality of data available in Maximo will have a direct impact on the quality and efficiency of these assessments.

According to data in Maximo, there are now close to 775 assets coded to 'Heritage Places Conservation' (i.e., PA2) in the Agency's national historic sites. Of these, 585 (about 75%) are considered to be of national historic significance. Table 4 compares the profile of these assets from the National Asset Review (2012) to more recent data in Maximo (September 2016).

**Table 4.  Profile of Parks Canada's Heritage Assets of National Historic Significance, 2012 to 2016**

| Year | Assets | Overall Condition Profile | | | | | | Grand Total | Value of Deferred Work ($K) |
|---|---|---|---|---|---|---|---|---|---|
| | | 'A' (Good) | 'B' (Fair) | 'C' (Poor) | 'D' (Very Poor) | 'C' + 'D' | N/A | | |
| **2012** | Total | 135 | 272 | 161 | 46 | 207 | 8 | 622 | 182,607 |
| | % | 22% | 44% | 26% | 7% | 33% | 1% | | |
| **2016** | Total | 216 | 56 | 163 | 150 | 313 | -- | 585 | 389,635 |
| | % | 37% | 10% | 28% | 26% | 54% | -- | | |
| **Total Change** | | ↑81 (60%) | ↓216 (-79%) | ↑2 (1%) | ↑104 (226%) | ↑106 (51%) | ↓8 (-100%) | ↓37 (-6%) | ↑207,028 (113%) |

Source: National Asset Review (2012) and Maximo (September 2016); data excludes heritage canal assets.

---

[25]    This asset group includes all of the Agency's built heritage assets, including but not limited to those found in national historic sites. High-risk assets (e.g., dams and bridges) are excluded from this estimate.

Context is critical to understanding the change in this data from 2012 to 2016. While it appears to indicate a large increase in number of built heritage assets in 'poor' or 'very poor' condition and related estimates in value of deferred work, this is more indicative of improvements in knowledge about the condition of the assets than an actual trend in condition. While a validation of the National Asset Review's results (2013) confirmed that these estimates were valid at the portfolio level and the asset group level, staff cautioned that there were inherent challenges in providing precise values of the condition, current replacement value and deferred work for individual assets. The estimates included in the National Asset Review are derived from a variety of sources that have different degrees of reliability, from detailed engineering reports, to maintenance plans, to simple visual inspections or desk exercises. Some of these sources were significantly outdated. Interviews with asset management staff confirmed that while recent estimates are useful, there are frequently condition issues that emerge once work on heritage structures actually starts that were not apparent upon a reasonable visual inspection.

**Understanding the application of asset management concepts in the context of built heritage.**

Key concepts used to define the condition of assets may also have a different definition or application when used in the context of built heritage. For example, there is an ongoing concern that the definition of 'condition' used for asset management (i.e., related to the functional performance of an asset) does not consider the heritage value of the assets. Definitions of condition used in the Agency's assessments of commemorative integrity overlap but do not align with that used by the Agency's Asset Management Services (see comparison in Appendix F). As a result, relying on condition ratings applied in Maximo may not accurately reflect the condition of assets when viewed as a cultural resource. Given this limitation, program managers noted that while a useful starting point, data in Maximo is not systematically used as the basis for condition ratings in commemorative integrity assessment. In some locations (such as example in text box), condition ratings need to be adjusted by the team completing the assessment to take heritage value into account.

---

**Heritage Condition of Cultural Resources in Dawson Historical Complex, Yukon**

This national historic site is commemorated for its importance as a boom town associated with the Klondike Gold Rush (1896-1910). The physical characteristics of the buildings which define their national historic significance include "evidence of hasty and impermanent construction, to meet immediate functional needs." Condition ratings in the Agency's asset management system are not able to reflect the distinction between a building that is structurally stable with its original character intact and one that is stable because its original structure has been unsympathetically replaced with a steel skeleton.



---

There are also conceptual differences in the use of 'current replacement value' when applied to cultural resources. For heritage buildings and engineering works, current replacement value is generally defined as the cost to reconstruct or replace the existing asset or its components with a replica that conforms to the shape, material and appearance of a specific restoration period. For contemporary assets, logic dictates that an asset should be replaced whenever the cost to repair an asset exceeds its overall value. However, given that cultural resources are theoretically irreplaceable, the Agency generally does not seek to recapitalize heritage assets but rather to ensure their long-term conservation. Any reconstruction or replacement may result in a significant loss in heritage value.

In 2012, the National Asset Review acknowledged that it is not uncommon that the cost to rehabilitate or stabilize a heritage asset to protect it from failure (i.e., value of deferred work) may be more than its current replacement value. The Evaluation of Parks Canada's Asset Management Program (2009) also found that there is a need to account for heritage assets likely requiring more important investments than contemporary ones, but noted a lack of literature that could be used to quantify this premium.

### 4.2.2.2 Improvements to the Condition of Heritage Buildings and Engineering Works

| Expectations: | Indicators: |
|---|---|
| • The condition of cultural resources of national significance at national historic sites is being maintained.<br>• There are plans to improve the condition of heritage assets in very poor or poor condition. | • Evidence of relevant planned/completed maintenance and conservation work.<br>• Estimates of deferred work. |

As shown in Appendix B, the scope of Parks Canada's performance expectations related to the condition of historic buildings and structures varied significantly over the evaluation period (i.e., from a broad focus on sites as whole to a narrow focus on individual buildings). While in most years the Agency reported achieving expected results, data presented in Departmental Performance Reports is insufficient to provide a detailed summary of performance.

As discussed, changes to the Agency's recorded asset profile make it difficult to conclude on the extent to which the overall condition of heritage buildings and structures at national historic sites has been maintained or improved. Expenditure data suggests that the vast majority of the sub-program's resources have been dedicated to some form of conservation and maintenance (see section 4.3.1). However, the Agency has recognized that until recently this funding was insufficient for sites to address all maintenance and deferred work. Further, while there is evidence of many different types of interventions taken to maintain and/or improve the condition of these heritage assets since 2010-11, in many cases work completed was at best a short-term solution to protect and/or stabilize heritage assets until resources would enable a more substantial intervention to be undertaken.

In November 2014, the Government of Canada announced a Federal Infrastructure Investment Program of $2.8 billion to support Parks Canada in addressing its backlog of deferred infrastructure work. Related to this investment, the current corporate target for the sub-program (i.e., to improve the condition of 100% of heritage assets to fair or good by March 2020) is applicable to all built heritage assets that were identified by the National Asset Review (2012) to be in poor or very poor condition. The investment is expected to have a positive impact on the condition of these assets; significant work has been planned or completed. By March 2017, the Agency reported that after two years of work 24% of its 328 targeted heritage assets had already achieved condition improvements. In May 2016, the Agency's project tracking system showed close to 120 additional projects planned or underway that target conservation work in 60 national historic sites, with a total project value estimated at $274M.[26] More than 60% of this planned investment will be allocated to the 10 sites with the most deferred work (Table 5). However,

---

[26]    Data extracted from Parks Canada Milestone Reporting Tool in May 2016; represents projects coded to 2402 – national historic site conservation science and maintenance. Of this total, $248M (91%) will be funded by the Federal Infrastructure Investment Program. The remainder will be funded from other envelopes in the Agency's Investment Program Framework.

the corporate target excludes any assets re-assessed as being in poor or very poor condition since 2012.[27] Planned investments identified in the table only cover about 55% of the estimated value of deferred work for these sites.

**Table 5. Value of Deferred Work vs. Expected Conservation Investment ($M)**

| National Historic Sites with the Highest Estimated Value of Deferred Work | Value of Deferred Work for Assets of National Significance (September 2016) | Value of Planned Conservation Work to 2022 (May 2016) |
|---|---|---|
| Fortifications of Québec | 112.2 | 53.0 |
| Lévis Forts | 42.3 | 5.5 |
| Province House | 41.1 | 41.1 |
| Grosse Île and the Irish Memorial | 34.7 | 5.8 |
| Halifax Citadel | 19.0 | 19.1 |
| Fort Henry | 16.4 | 10.5 |
| Carleton Martello Tower | 14.4 | 14.1 |
| Fort Lennox | 11.8 | 9.0 |
| Lower Fort Garry | 9.8 | 8.0 |
| Bar U Ranch | 9.7 | 4.3 |
| **Total** | **311.3** | **170.4** |

Source: Maximo (September 2016), Milestone Reporting Tool (May 2016)

#### 4.2.2.3    Effectiveness of Project Management for Heritage Buildings and Engineering Works

| Expectations: | Indicators: |
|---|---|
| • Major projects adhere to Parks Canada and industry project standards, including consideration of impact on cultural resources. <br>• Projects are completed on time, on budget and within scope. <br>• Management has used available flexibilities to encourage efficient operations. | • Evidence that major projects follow Parks Canada Project Management Standard. <br>• Evidence of assessment of impact of interventions on cultural resources. <br>• Comparison of project approvals to project delivery. |

We expected Parks Canada to have efficient project management processes in place to ensure that major capital projects are delivered on time, on budget and within scope. A lack of central records on project approvals and delivery results limited our ability to comprehensively assess the efficiency of related project management processes over the period under evaluation. However, project management practices have recently been revised to increase the level of rigour applied to project approvals, monitoring and reporting. Along with an updated Project Management Standard (2016), the Agency has developed a Milestone Reporting Tool to provide detailed information on each of the Agency's projects, including approved funding, scope, and implementation progress.

In 2013, revisions to the Agency's Cultural Resource Management Policy also introduced an explicit requirement to assess the impact of proposed interventions that may adversely impact a cultural resource and minimize related impacts on heritage value. In July 2015, the Agency introduced a new Cultural Resource Impact Analysis process to support this requirement. The process has also been integrated into the Agency's updated Project Management Standard, and guidance and templates have

---

[27]    Change in rating could be due to deterioration of condition or improved knowledge of condition of the asset.

been developed to support its consistent application. All major projects (i.e., asset projects, Information Technology-enabled projects and those funded centrally under the Agency's Investment Program Framework) that may impact a cultural resource now require a Cultural Resource Impact Analysis.

While these changes are viewed as important improvements in project management, it is too soon to make any observations related to the effectiveness of these procedures or their impact on project delivery. For example, Parks Canada reported that all of the 70 Cultural Resource Impact Analyses completed in 2015-16 included measures to mitigate or reduce impacts to cultural resources. However, there is no information available on the extent to which the mitigation measures identified have been appropriately applied.

Regardless, the evaluation did identify some potential inefficiencies with the new impact assessment process. Projects – particularly asset projects – often need to meet the requirements of a number of assessment processes before being approved.[28] Interviewees suggested that impact assessment requirements are often replicated across processes, without adding significant value. Our review of a sample of files confirmed that in many cases the sections on cultural resources involve little more than a 'copy and paste' of existing assessment results.

Some interviewees also noted concern with accountabilities for Cultural Resource Impact Analyses. Guidance indicates that a request for an assessment must be filled-out for all projects that may affect a cultural resource; the relevance of the process to a specific project is to be determined by a cultural resource management advisor who will then determine the relevance of the process and, if required, coordinate the process to ensure the involvement of appropriate functional specialists. However, staff that have been involved in the process perceived their input to be either neglected or introduced too late in the planning process, resulting in its cursory consideration with potential negative impacts on heritage assets.

4.2.3   **HISTORICAL AND ARCHAEOLOGICAL OBJECTS**

The Agency's performance expectations for the sub-program have also focused on knowing and maintaining the condition of historical objects in its collection. While the focus of related performance expectations is on historical objects of national historic significance, our evaluation considered the management of the collection as a whole. Related results are discussed in the following sections.

---

[28]   Additional impact assessment processes applied by Parks Canada include, for example, Archaeological Overview Assessments, Federal Heritage Buildings Review Office Reviews of Intervention, Environment Impact Assessments, and Recreational Activity and Special Event Assessments. The performance of these processes was not included in the scope of this evaluation.

### 4.2.3.1   Inventory of Historical and Archaeological Objects

| Expectations: | Indicators: |
|---|---|
| • Quality information systems exist to track Parks Canada's inventory of cultural resources.<br>• Records and documentation are maintained in appropriate standards. | • Evidence of quality assurance/quality control for information systems, records and documentation, including Parks Canada's ability to access reliable and current data on the inventory of resources at national historic sites.<br>• Comparison of Parks Canada's information systems to industry benchmarks. |

**Parks Canada has defined the scope of its collection.**

As per the Parks Canada Scope of Collection Statement (2014), the Agency maintains a single national collection of **historical and archaeological objects** (determined through evaluation to be cultural resources) that have been acquired by Parks Canada to support its mandate and have been accessioned into the collection. Beyond priority for management and investment given to objects of national historic significance (i.e., those associated with the reasons for designation of a national historic site), the Agency's collection management systems and practices do not treat objects differently based on origin.

> **Historical Objects:** non-archaeological objects that provide evidence of past human activity.
>
> **Archeological Objects:** objects that provide evidence of past human activity recovered from an archaeological site or context.

The scope of this collection also includes historical and archaeological objects that are not cultural resources, but that are required for planned current or future Parks Canada program purposes, such as enhancing visitor experience and promoting public understanding, appreciation, and enjoyment of Parks Canada's protected heritage places. Examples include period furnishings, antiques, and type collections. Reproductions (i.e., copy or replica based on historical or archaeological objects or related data) are generally not cultural resources, and are not considered to be part of the Parks Canada collection.

**There are deficiencies in Parks Canada's information systems for collections.**

We expected the Agency to have reliable, accessible and up-to-date information systems in place to track its inventory of cultural resources (as per requirements of the Cultural Resource Management Policy). We found that the Agency has significant challenges in meeting some of these requirements.

The Agency reports that its collection includes over 700,000 historical objects (excluding archaeological artifacts). During the period under evaluation, the Agency's Artifact Information System was the system of record for this collection. As of July 2016, it included records for 576,484 objects. As shown in Table 9, only 6% of these objects are recorded as being of national historic significance and 32% as being of other heritage value.[29] The majority (about 52%) of the objects in this database are recorded as reproductions of no historic value. The system shows objects in the Agency's collection to be dispersed across the country, with about 51% in one of six Parks Canada collection facilities and 49% stored at individual national historic sites or other on-site locations (e.g., on display in national parks, etc.).

---

[29]   Classification of historical objects in Artifact Information System has not been updated to reflect the renewed Cultural Resource Management Policy (2013).

**Table 6. Objects in PCA Artifact Information System, by Category and Location**

| Category of Object | | Storage Location | | Total | % of Total |
|---|---|---|---|---|---|
| | | **National Office** | **On-Site** | | |
| Historical Objects | National Historic Significance [a] | 15,165 | 17,200 | 32,365 | 6% |
| | Other Heritage Value [b] | 95,460 | 91,520 | 186,980 | 32% |
| | Other [c] | 3,267 | 8,484 | 11,751 | 2% |
| | Heritage Value Unknown | 35,163 | 160 | 35,323 | 6% |
| Reproductions | | 140,986 | 160,753 | 301,739 | 52% |
| Natural Specimens | | 79 | 5,384 | 5,463 | 1% |
| Unknown | | 1,470 | 1,393 | 2,863 | <1% |
| **Total** | | **291,590** | **284,794** | **576,484** | **100%** |

**Notes:**
a – Identified in Artifact Information System as 'Historic Object Level I'; direct relationship with reasons for designation of a national historic site.
b – Identified in Artifact Information System as 'Historic Objects Level II'; support the Commemorative Integrity of a national historic site but not directly related to reasons for designation.
c – 'Other' includes historical objects (e.g., antiques) with no heritage value as defined by Cultural Resource Management Policy.

Source: Extracted from Artifact Information System, July 2016

There is no similar central source of information for archaeological objects and so, while the Agency can estimate the magnitude of the collection (≥ 30 million artifacts), confidence in counts across the total inventory is relatively low. The interpretation of an archaeological object is also inconsistent, resulting in variable counts. For example, one archaeologist may count a collection of pot shards as a single object, while another may count each shard separately. While archaeological objects associated with a national historic site may also be of national historic significance, there has been no national evaluation completed to determine the proportion of the collection that falls in this category.

**Parks Canada is working to replace its cultural resource information system.**

Currently, information on the Agency's cultural resources is housed in and administered by Parks Canada offices across the country, in many varied and disparate systems as well as in reference, document and photo repositories. The nine major databases in use do not communicate with each other, lack standardization and have often redundant information and functionality. Many of these information systems are also outdated, resulting in a lack of proper support and few staff who know how to access them, with data at risk from a system failure. Systems have not been updated to reflect the revised Cultural Resource Management Policy (2013). Access to quality information is therefore a challenge, resulting in delayed or potentially flawed decisions for cultural resource management (e.g., challenge to access archaeological reports required to support informed decision-making on infrastructure projects).

Recognizing these issues, plans to develop a single, standardized Cultural Resource Management Information System have been discussed for close to ten years. In September 2016, Parks Canada finally contracted the installation and licensing of a new system based on an off-the-shelf collections management software, configured for the Agency. The launch of this system was expected to be completed by March 31, 2018.

There is an option to extend the contract for up to three years to allow for the completion of data migration. Program managers indicate that the data from existing systems is currently being cleaned to enable effective data migration. The software contains a number of fields that, based on past experience, can reportedly accommodate the transfer of data from most users' legacy systems. However, given the poor state of the Agency's existing databases, program staff interviewed were concerned with that data quality issues would likely persist in the new system or delay full migration.

A review of benchmark organizations found that meeting high standards for cultural resource information management is a common challenge, particularly for large and dispersed collections. Many organizations also struggle to keep their information systems up-to-date and usable given frequent changes in technology and platform updates. Discussions with representatives from benchmark organizations that have moved to a consolidated system indicated data migration was a major problem. Further, they noted that the move to digitization of collections makes records more accessible but can also be costly and challenges organizations to manage data input and storage requirements.

As discussed in section 4.2.1.3, revisions to the process for commemorative integrity assessments now direct that ratings for the condition of historic objects be derived to the extent possible from existing databases. To ensure the validity of these assessment, it is therefore imperative that data on the inventory, heritage value and current condition of historical objects associated with a site be reliable and complete.

**Review of collection presents challenges and opportunities.**

Periodic review is required to ensure that the collection conforms to Parks Canada's Scope of Collection Statement and, where relevant and feasible, to reduce storage requirements ($m^2$) by disposal or re-use of objects. Parks Canada enacted a new Directive on Acquisition and Disposal of Historical and Archaeological Objects and Reproductions in March 2014 which clarifies the scope of the collection and acceptable criteria and requirements for disposal of objects.[30] This directive – and the move to a standardized database for cultural resources – could facilitate this process. However, with the exception of collections maintained at a small number of specific national historic sites, no concerted effort to review the collection has been undertaken since 2012 (limited to the two facilities in Ontario).

We found that many benchmark organizations view the collection and disposal and de-accessioning of objects (i.e., the procedure of recording the removal of an object from a permanent collection) as a particular challenge. Such disposals require an administrative process heavily based in due diligence that is both time-consuming and rarely cost-effective given space savings achieved. It is unlikely that vast majority of the cultural resources in Parks Canada's collection would meet the criteria for disposal except by gratuitous transfer or donation (e.g., to return objects or artifacts to the care of an affiliated First Nation). However, data in the Agency's Artifact Information System suggests that close to 50% of the objects in Parks Canada's warehoused collection are reproductions with no heritage value that could be disposed of without having to follow the same stringent requirements.

---

[30] Acceptable reasons for disposal of objects include: change in program needs; redundant multiple objects; threats to health and safety; loss of heritage value; and/or in response to legal and ethical claims.

### 4.2.3.2   Assessing the Condition of Historical Objects

| Expectations: | Indicators: |
|---|---|
| • Progress is being made to assess condition of all objects of national significance (by 2016). <br> • Condition of 5000 objects was reassessed by March 2015. | • Trend in number of objects where condition assessed/unknown, per fiscal year. <br> • Evidence of plans to complete assessment of objects where condition unknown. <br> • Number of objects reassessed by March 2015. |

From 2014-15 to 2015-16, Parks Canada had performance expectations to assess or reassess the condition of historical objects in its collection. It expected 5000 objects of national historic significance whose condition was known to be reassessed by March 2015 and 100% of objects for which the condition was unknown to be assessed by March 2016. These targets focused on objects in the Agency's six collection facilities, estimated (2013) to house 38,861 objects of national significance of which 8,999 objects did not have a condition rating.

Results against these performance expectations are mixed. By March 2015, the Agency reported that it reassessed the condition of 4,171 historical objects (i.e., 83% of target). By March 2016, the Agency reported that assessments of objects with unknown condition had been 100% completed. As of July 2016, data in the Artifact Information System indicates that there were close to 1,400 objects of national historic significance in the Agency's collection facilities with an unknown condition (i.e., 9%). Some of this gap will be accounted for by additions to the collection (an estimated 30,000 objects since 2010).

While this data indicates progress towards the Agency's targets, it applies to a relatively limited sub-set of the national collection. When viewed as a whole, evidence suggests that there are still large gaps in the Agency's knowledge of the condition of its collection of historical objects. Factoring in objects stored at on-site locations, the condition is reported to be unknown for an estimated 12% of objects of national historic significance. In total, the condition is recorded as unknown for close to 42,000 historical objects. Most of these (85%) have yet to have their heritage value evaluated.

The interval between object assessments also creates some uncertainty about the reliability of condition data reported in Artifact Information System. This system effectively presents the condition of objects as a snapshot in time. While condition may be periodically re-assessed, there is no process in place to systematically review the condition of all objects. Instead, the Agency relies on the expertise of its collection managers to assess the stability of the collection. While this practice is also common in benchmark organizations, it assumes that the resources are in place to make these expert observations. While this capacity exists for objects stored within Parks Canada major collection facilities, most field units lack capacity for collections management that could provide regular, expert observation of the condition of the numerous objects stored at parks and sites.

**This issue is addressed by Recommendation 4.**

### 4.2.3.3   Stability of Historical and Archaeological Objects

| Expectations: | Indicators: |
|---|---|
| • Historical and archaeological objects are maintained in stable condition; 90% of historical objects of national significance were maintained in good or fair condition by March 2013.<br>• Interventions to objects adhere to Parks Canada Agency and industry standards.<br>• Parks Canada Agency collections management adheres to industry standards. | • Trend in known condition of objects.<br>• Evidence of plans/actions to maintain condition of objects.<br>• Evidence of application of standards for conservation of objects.<br>• Comparison of Parks Canada Agency collections management to industry standards. |

From 2010-11 to 2014-15, Parks Canada also had a performance expectation to maintain 90% of historical objects in fair or good condition.[31] Results against this target were only publicly reported for two years (2012-13 and 2014-15). In both cases, the Agency reported narrowly missing this target, with just under 90% of relevant objects recorded as being in good to fair condition.[32] Data extracted from the Agency's Artifact Information System (July 2016) indicates that closer to 80% of historical objects of national historic significance where the condition is known are currently recorded as being in good to fair condition. While this data suggests an increase in the percent of objects in poor condition since 2014, the reliability of these reported results is subject to the same data limitations noted above.

**Staff report a growing backlog of conservation treatment as demand exceeds capacity to deliver.**

Parks Canada's conservation labs are currently co-located with or near the six major collection facilities and at the Fortress of Louisburg National Historic Site. Conservation treatments are either completed in these labs or by conservators working on-site, as required by the object being treated. When deterioration of an object is observed, objects may be recommended for conservation treatment. The extent of the conservation treatment (e.g., stabilization, cleaning and repair, infilling of missing parts, complete restoration) will vary depending on the needs of the object and available resources.

Starting in 2015-16, the expected result for the Heritage Places Conservation Program included a focus on maintaining or improving the condition of objects at nine specific national historic sites by 2018.[33] While the Departmental Performance Report for 2015-16 reported that Parks Canada is "on track" to meet this target, it is not clear how these reported results relate to the sites originally targeted (i.e., related text speaks to work completed at 16 undefined sites).

From 2015-16 to 2016-17, records suggest that the Collections, Curatorial and Conservation Branch approved an estimated 20,000 hours of conservation support to field units.[34] This excludes requirements for conservation work that are identified directly by conservators working in one of the Agency's

---

[31]   Definition of 'good', 'fair' and 'poor' for historic objects are provided in Appendix F.

[32]   Reported performance – in 2012-13: 87.5%; in 2014-15: 89%.

[33]   The eight sites include the Her Majesty's Canadian Ship Haida National Historic Site, Laurier House National Historic Site, Ryan Premises National Historic Site, Dawson Historical Complex, Fort Rodd Hill National Historic Site, Alexander Graham Bell National Historic Site, Red Bay National Historic Site, and Forges du Saint-Maurice National Historic Site. The target also included one collection owned by Parks Canada currently on display in the Vancouver Maritime Museum, i.e., the St. Roch National Historic Site (a dry-docked Royal Canadian Mounted Police schooner, the official historic designation refers to the ship itself and not its physical location).

[34]   Estimates derived from Parks Canada's Service Request System. Reliability of this data not tested.

collection facilities. While there is evidence that some of this work has been completed, records are not readily available to track the Agency's actual delivery against these commitments. Interviews with the Agency's conservators suggest that the demand for conservation services is greater than the capacity of the Agency, creating a growing backlog of required treatment. Besides deterioration of objects, which may be more difficult to arrest or reverse if left untreated for extended periods, this may also have an impact on visitors' perception of sites. Site staff reported that the long interval between cleaning of objects on display at some sites leaves visitors with an impression of negligence by Parks Canada.

**Parks Canada's objects are stored in varying conditions of security and environmental control.**

Various factors mean some percentage of objects will always be in poor condition (e.g., risk of intervention may exceed the potential benefits). For conservators, more important than the actual condition of an object is the trend in condition; poor condition may be acceptable provided that an object's condition is stable (i.e., not at risk of deterioration). Ensuring the stability of condition through preventive conservation is the lowest risk and least costly method of object conservation. Parks Canada and industry conservation standards agree that proper environmental conditions, for example, humidity and temperature control, appropriate lighting, control of airborne contaminants, pest control and adequate security, as well as professional storage and handling procedures, are required for the effective preservation of historical and archaeological objects. Stability of condition is also more easily quantifiable as a performance measure, as it relates to standards that can be simultaneously controlled and monitored for a large collection of objects.[35] Controls required to meet these standards were observed in our site visits to benchmark facilities. We expected Parks Canada to have similar controls in place to ensure the stability of its collection.

About 51% of Parks Canada's collection of historical objects is stored in one of the Agency's six collections facilities.[36] The facility in Dartmouth, Nova Scotia was purpose-built for collections storage. The other facilities – in Winnipeg, Ottawa, Cornwall, and two in Quebec City – have all been repurposed for object storage and conservation. While the program was not able to provide any detailed reports on the state of its storage facilities, the Agency estimates that these facilities require significant investment to (continue to) meet museological standards. One of the facilities in Quebec City was intended to be temporary storage; five years later, thousands of historical objects continue to be stored as shipped, wrapped in boxes on pallets. Given that this facility lacks the environmental controls required to ensure the stability of the collection, the current condition of these objects is unknown.



**Quebec City Collection Facility**

---

[35]  Parks Canada amended its performance expectation for the sub-program in 2016-17 to focus on "stability of condition." However, the methodology used to measure results continues to focus on the condition of individual objects rather than overall stability of the collection.

[36]  Data is not available to provide similar estimates for the distribution of the collection of archaeological artifacts; these artifacts are believed to be similarly distributed among collections facilities and on-site locations.

Most national historic sites with an active visitor offer also maintain objects on site, used for interpretation. While the number of objects presented at most sites is relatively limited, some (e.g., Alexander Graham Bell National Historic Site, Laurier House National Historic Site) are effectively museums with hundreds of objects on display. A few national historic sites also have their own on-site collections facilities; some (e.g., Fortress of Louisburg National Historic Site and Dawson Historical Complex) store hundreds of thousands of historical objects and archaeological artifacts. Reasons cited for maintaining the collection on-site vary with the context of specific national historic sites but most frequently include one or more of the following:

- Size of the collection and/or size of objects in the collection (e.g., large vessels, machinery);
- Costs and risk related to shipping objects to collection facilities;
- Conditions agreed to on acquisition of objects and/or pressure to retain objects locally; and
- Large collections of archaeological objects related to the site which are maintained on location to preserve their value.[37]

While we lack data to conclude on the extent to which these facilities are effectively ensuring the stability of the overall collection, there is sufficient evidence to suggest some deterioration is likely in many locations. Depending on the site, storage varies from custom built facilities to standard shipping containers, with significant differences in their ability to meet standards such as climate control and security. While at least one site (Fort Langley National Historic Site) provided evidence of an integrated pest management program, many others had clear evidence of infestation. Further, while all locations maintain a fire system, we were not provided with any evidence of more detailed emergency preparedness plans (i.e., flood, earthquake, power loss).

**Consolidation of collection should improve conservation but progress has been slow.**

In June 2012, the Agency announced that it would consolidate (1) its collections and related staff from its six existing collections facilities into a single location in Gatineau, Quebec and (2) the Agency's existing conservation laboratories into a single location in Ottawa, Ontario. The Agency expected this move to result in several benefits:[38]

- **Improved preventive conservation** by transferring all objects to a new facility where standards for environmental controls and security can be ensured. This transfer is expected to be more cost-effective than the significant investment needed to upgrade the existing collections facilities.
- **More efficient use of storage space.** Design documents for the consolidation project indicate that the new facility designed for more efficient use of space should reduce rentable floor space used by the Agency by 33% (as compared to the leased space across its six existing collections facilities). This includes space for staff offices, records storage, and for special purpose workstations and equipment to be used in processing objects (e.g., cleaning, cataloguing, shipping, etc.). Total reduction in usable objects storage space is expected to be about 3500 m$^2$ (i.e., 38.5%).
- **Cost savings on accommodations** of an estimated $1.9M per year.

---

[37]     As a general rule, archaeological collections should be stored in a single location as their value derives from the fact that they were all recorded together as part of one piece of research. If a collection is scattered in such a way that it cannot be brought together again, it loses most of its scientific value.

[38]     Expected savings here are as reported by Parks Canada; they have not been validated by the evaluation.

- **More efficient management of the collection** by consolidation of staff (e.g., less duplication of functions), with an expected further cost savings of $3.3M per year on salary, operation and management.
- **Increased opportunity for public access** to the collection, as current design plans for the new facility include space dedicated to the presentation and ceremonial use of objects. The new facility would also continue to provide access for researchers.

The Agency expects the storage space allocated in the consolidated facility to be sufficient to both house the existing collection and accommodate for any growth projected over the next 25 years. In 2015, Public Service and Procurement Canada completed an investment analysis examining various options for the consolidation of the collection and recommended Crown construction of a new special purpose facility owned and operated by Parks Canada as being the approach that provides the best value-for-money over this period. In 2015, estimates for the construction of the new facility and consolidation of the collection were expected to be completed at a cost of $45.4M.

In August 2017, the Agency announced a decision to retain operations at the purpose-built facility in Dartmouth. While the leases for most existing facilities are set to expire, the lease for the Dartmouth facility is not set to expire until 2029. The cost of early withdrawal was estimated at $4.8 million. Local Indigenous, community and academic groups also strongly opposed the move. We were not provided with data to indicate how this decision impacts on expected project costs and estimated savings; the Agency has yet to revise its estimates of return-on-investment given recent changes in project scope.

The initial project implementation plan for the collections consolidation (2012) expected the move of the collection to be completed by the end of 2016. However, land acquisition was not completed until November 2017. Parks Canada has made progress towards some of key deliverables (e.g., identification of accommodation solution) but significant work remains to be completed before the expected move. Construction of the new facility and consolidation of the collection are now expected to be completed by January 2021. While we lack a benchmark that can be used to determine a reasonable timeline for the project, [39] some program managers perceived this to be an unacceptable delay that has resulted in some notable impacts (e.g., several employees on prolonged affected status, added costs related to temporary lease renewals). In the interim, large parts of the Agency's collection also remain at risk due to inadequate storage conditions.

Parks Canada has taken recent steps to address project delays. In January 2017, the Agency's Project Delivery Services was engaged to provide project management services for the consolidation project. There is now a Project Manager dedicated exclusively to the project, with support from a Project Officer dedicated to the coordination of the facility move component.

Project implementation plans also outline numerous deliverables related to the logistics of consolidation perceived to be critical to project success; inadequate attention to these project elements could result in reputational and/or legal risks for the Agency. While progress to date against these deliverables has also been slower than initially expected, Parks Canada expects to have all logistical plans in place in time for

---

[39]   Many benchmark organizations have moved towards consolidation of their collection but the scope and scale of these projects has varied, along with related timelines. For example, the United States' National Park Service's Collection Storage Plan (2007) aims to reduce the number of parks with a storage facility from 295 to 162 over a 21-year period.

the scheduled move. For example, based on a pilot completed in March 2017, Parks Canada is now developing guidance on collection relocation to ensure the effective and efficient relocation of collections (packing, transport and unpacking) and mitigate related risks (e.g., protection of collection and related documentation from damage or loss). Final logistical plans will consider human resources (i.e., to plan effective staff relocation and mitigate related risks related to potential loss of corporate knowledge) and levels of service and access to the collection, both during and after the move.[40]

Ongoing collection review is built-in to Parks Canada's plans for the collections consolidation project. This review is also required to identify constraints (e.g., formal agreements) that may limit object relocation and consult with affected stakeholders to mitigate concerns.[41] There is no duty to consult on the movement of objects in Parks Canada's collection. To date, the Agency has engaged in limited consultation but plans have recently been drafted to guide consultation with Indigenous groups. Recent reports indicate that discussions are also taking place with other stakeholders interested in keeping regional collections from being relocated. Discussions such as these factored into the decision to retain the existing collection facility in Dartmouth.

### 4.2.4   ARCHAEOLOGICAL SITES

There are an estimated 12,000 **archaeological sites** on lands under the Agency's administration; the majority are found in national parks (program estimates indicate that only 11% of archaeological sites are in national historic sites). The Agency's performance expectations for the sub-program focus on archaeological sites of national historic significance (i.e., related to the reasons of designation of a national historic site). However, the Agency is responsible for ensuring appropriate management of these cultural resources regardless of location. Our evaluation considered the management of all archaeological sites under the Agency's administration. Related results are discussed in the following sections.

> **Archaeological Sites:**
> Places where tangible evidence of past human activity of historical, cultural or scientific interest is or was located in situ on, below or above ground, or on lands under water.

**Parks Canada's corporate target for archaeological sites has not been systematically prioritized.**

| Expectations: | Indicators: |
|---|---|
| • The Agency has a rationale for prioritization of interventions at archaeological sites. | • Evidence of analysis/criteria for prioritization of interventions at archaeological sites. |

Since 2014-15, Parks Canada Agency has had a corporate performance expectation to assess and reduce threats at a targeted number of its archaeological sites (i.e., 6 sites by March 2015 and 12 sites by March

---

[40]   Consolidation will have a large impact on how Parks Canada Agency operates given that collections and conservation functions are currently co-located at various sites. For example, historic objects requiring conservation work would be shipped to the central location. Related changes will require modifications to how objects and artifacts are moved, processed, etc.

[41]   For example, some Park Impacts and Benefits Agreements provide that title and management of all archaeological materials found in a national park are vested jointly in the Governments of Canada and local Indigenous governments.

2018), with a focus on those that are of national historic significance.[42] In principle, we would expect the Agency to dedicate its limited resources for this priority to the areas of greatest need. However, we found no evidence of coherent criteria used to determine how priority sites were selected for this corporate target.

Data was not available to estimate the total number of archaeological sites under Parks Canada's administration that may be under threat. The Agency does not currently maintain centralized records for its terrestrial or underwater archaeological sites; this gap is expected to be addressed by the Cultural Resource Management Information System. Active monitoring of the condition for all archaeological sites is also logistically challenging given their vast number and geographic dispersion. However, results from Commemorative Integrity Assessments based on best available knowledge show that most (65%) of national historic sites rated their archaeological sites to be in 'good' or 'fair' condition (Table 7). Trend data was only available for 13 national historic sites; nine of these sites showed a declining trend in the condition of archaeological resources. The accuracy of these ratings was not tested by the evaluation and cannot be confirmed without active monitoring.

**Table 7. Condition of Archaeological Sites as per Commemorative Integrity Assessments, 2001-02 to 2011-12**

| National Historic Sites Reporting Condition [a] | Resource Condition [b] | | | | No Known Archaeological Sites |
|---|---|---|---|---|---|
| | **Good** | **Fair** | **Poor** | **Not Rated** | |
| **Number [c]** | 49 | 30 | 8 | 17 | 18 |
| **% of Total** | 40% | 25% | 7% | 14% | 15% |

Notes:
a-  Data in our files was only available for 122 (i.e., 90%) of the national historic sites that have completed a commemorative integrity assessment.
b-  Table presents the summary resource condition for archaeological sites. Definitions of resource condition are provided in Appendix F.
c-  National historic sites may have one or more archaeological sites associated with the designated place. Assessment results present an overall score for the condition of these cultural resources in a given location, not for individual archaeological sites.

While useful information, these ratings were not used as a basis to select priority sites for the corporate target. Rather, most of the sites were included in the target based on the Agency's knowledge of field units' existing work plans. As a result, this target includes just one of the eight national historic sites where the overall resource condition of archaeological sites was rated as 'poor' in the last commemorative integrity assessment (i.e., Fortress of Louisbourg National Historic Site).

The Cultural Resource Management Policy gives Field Unit Superintendents the responsibility to set priorities for the management of and investment in cultural resources, including archaeological sites. While program managers expressed concern about the ongoing deterioration of some specific archaeological sites, they also indicated that interventions at these locations were generally not given priority provided the limited resources available to field units. Further, they noted a lack of central investment funding available to support required preservation efforts. The result is that some national

---

[42]  There is overlap in the list of sites to be addressed by 2015 and by 2018. In total, archaeological sites at 14 national historic sites are included in the corporate target.

historic sites (e.g., Navy Island National Historic Site) contain archaeological resources that have long been considered to be at significant risk but where no actions are planned.[43]

**This issue is addressed by Recommendation 5.**

**Parks Canada has assessed and reduced threats at archaeological sites.**

| Expectations: | Indicators: |
|---|---|
| • Progress is being made to assess and reduce threats to: <br>     o 6 archaeological sites (by March 2015). <br>     o 12 archaeological sites (by 2018). | • Evidence of actions taken/planned at (targeted) archaeological sites to: (1) assess threats; (2) analyse options to reduce threats; and/or (3) reduce threats. |

Conservation of archaeological resources requires knowing the location and heritage value of sites and taking appropriate actions to assess and reduce threats to their integrity through **preservation** or **rehabilitation**. As archaeological resources cannot be duplicated or replaced, conservation guidelines followed by Parks Canada indicate that archaeological sites should in principle be preserved in situ by limiting negative impacts on the site's physical integrity.

> **Preservation** involves actions to document, stabilise, shelter, cap or rebury an archaeological site. These may be appropriate mitigations when the heritage value of the site is threatened by natural forces or human action.
>
> **Rehabilitation** involves actions to present the heritage value of an archaeological site, e.g., construction of access trails or installation of interpretive panels or plaques.

While reasons for prioritization are not clear, evidence suggests that Parks Canada has made progress in meeting targets to assess and reduce threats to targeted archaeological sites. By March 2015, the Agency reported having met its initial target, i.e., it had assessed and reduced threats at six archaeological sites.[44] Our review of available documentation confirms this result and shows progress towards its target to address 12 sites by March 2018 (see Appendix G). This does not mean that threats were eliminated—and this is not the target—but rather that threats were assessed and have been or are expected to be reduced through reasonable mitigation. Some sites (e.g., York Factory National Historic Site) are still being assessed to determine how to best protect archaeological resources where experts agree natural forces such as erosion and sea level rise will lead to inevitable loss.



**Erosion at York Factory National Historic Site**

Most of the targeted archaeological sites were identified as a priority in response to planned or ongoing infrastructure projects. We found that the Agency has standard procedures in place to assess potential impacts of proposed projects in all areas with known archaeological sites and in the event of accidental

---

43    Archaeological resources are among the key character-defining elements of Navy Island National Historic Site; these received a "red" rating in its last commemorative integrity assessment (2005-06). Continuing shoreline erosion and uncontrolled vegetation growth were identified as key threats to the archaeological resources.

44    Two of the sites where progress was reported (i.e., Chilkoot Trail National Historic Site and Fort Mississauga National Historic Site) were not those included in the initial target but have since been added as priority sites.

discovery of archaeological resources during project implementation. Now part of the Cultural Resources Impact Analysis, field units are advised to allow up to three weeks to complete an Archaeological Overview Assessment (including an assessment of required mitigation measures). Additional time may be required if fieldwork is deemed necessary to complete an archaeological assessment. During site visits, costs and potential time delays associated with this process were negatively perceived by many field unit staff and managers as added pressures on project delivery. The Agency has responded to increased demands by creating four standing offers enabling field units to engage additional archaeological support. However, as noted in section 4.2.2.3, functional specialists involved in the process do not perceive impacts to cultural resources to be consistently considered during the project planning phase. Further, given the current rate of implementation of infrastructure projects and (to a lesser degree) the lack of easily accessible records for archaeology, Parks Canada's staff archaeologists remain concerned that risks related to infrastructure projects are being assumed without adequate capacity to track or mitigate them.

## 4.3   PERFORMANCE: EFFICIENCY AND ECONOMY

A program is **efficient** to the extent a greater level of output is produced with the same level of input, or, a lower level of input is used to produce the same level of output. The level of input and output could increase or decrease in quantity, quality, or both. A program is **economical** to the extent the cost of resources used approximates the minimum amount needed to achieve expected outcomes.

The information presented below is based on the premise that data in the Agency's financial system has been correctly coded. Past evaluations and consultations have shown that this is not always the case. While we inform the reader when errors are identified, our work is not to generate new financial data or validate its accuracy.

| Expectations: | Indicators: |
|---|---|
| • Costs of national historic site conservation are known and verified. <br> • Costs of national historic site conservation are reasonable given nature of sub-program and compared to industry standards. | • Difference between planned and actual spending (overall and project-specific). <br> • Extent management has used available flexibilities to encourage efficient operations. <br> • Perspectives on sub-program efficiency. |

### 4.3.1   DESCRIPTION OF EXPENDITURES

The National Historic Site Conservation sub-program is funded through both general appropriations (A-Base) and special purpose funds. Parks Canada began reporting on expenditures at the sub-program level in 2012-13. From 2012-13 to 2015-16, average annual expenditures on the sub-program were reported to be about $43M. These expenditures account for about 29% of the Agency's total Heritage Resource Conservation expenditures over this period. While the sub-program has experienced an overall downward trend in expenditures (Figure 1), planned expenditures were expected to increase to $83M in 2016-17 and future years. This increase is mostly attributed to the addition of special purpose funds received under the Federal Infrastructure Investment.

**Figure 1: Trends in Cultural Resources Management Expenditures, 2010-11 to 2015-16**
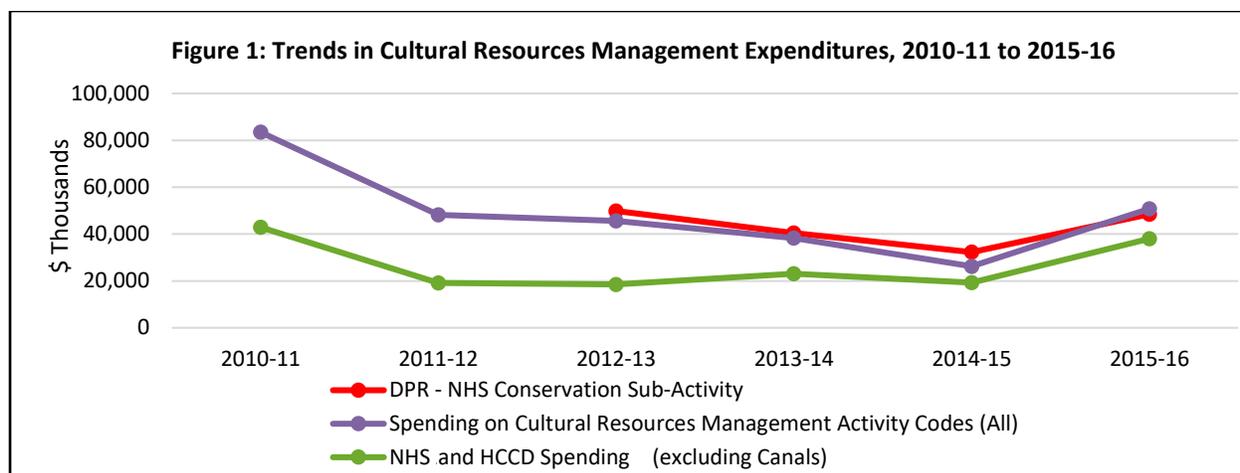


Source: Data provided by Finance and as presented in Departmental Performance Reports
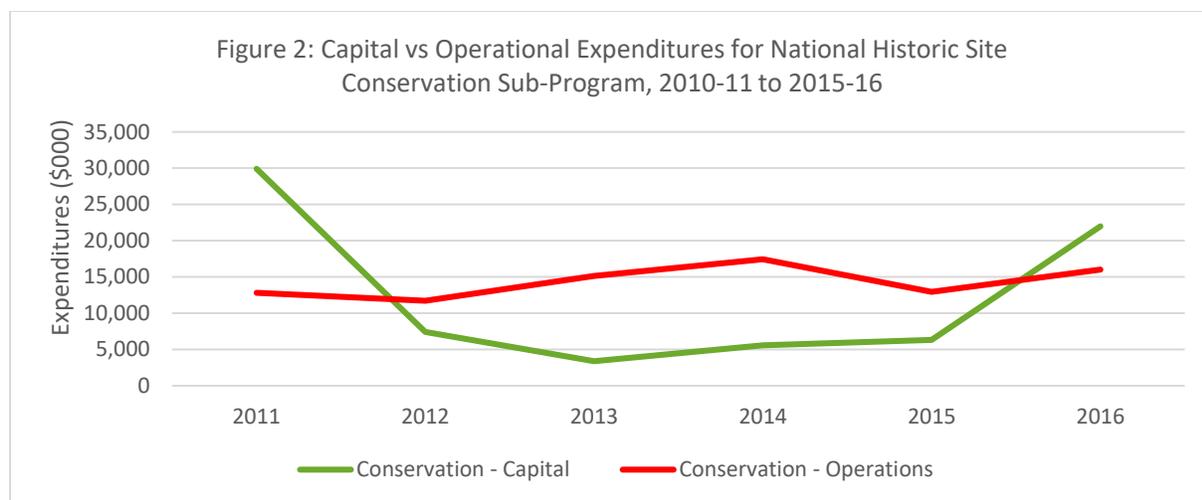
The structure of the Agency's financial system and major changes to its financial coding structure in 2014-15 limit the evaluation's ability to provide a detailed description of the sub-program's expenditures over the entire evaluation period (2010-11 to 2015-16). However, available data suggests the following:

- Expenditures related to the sub-program account for about 93% of the Agency's total spending on cultural resource management (2014-15 and 2015-16).[45] Within these expenditures, an estimated 89% of spending focused on conservation and maintenance[46] and 11% on monitoring and reporting.
- National Office plays an important role in supporting achievement of sub-program objectives. Over the evaluation period, its support accounted for an estimated 24% of total Agency expenditures on cultural resource management. The remainder was spent by 87 different reporting units.[47]
- Based on a six-year average, the majority of reporting units (61%) spend less than $100K per year on sub-program activities. Only seven reporting units spent an average of more than $1M per year; most of these are large heritage complexes (e.g., Fortifications of Quebec National Historic Site, Dawson Historical Complex, Fortress of Louisbourg National Historic Site).
- From 2010-11 to 2015-16, we observed an important variation in capital expenditures (Figure 2). These fluctuations are aligned to various special purpose funds received for infrastructure investment. By contrast, expenditure on operations were relatively stable. On average, roughly 65% of these expenditures were for goods and services, with the remainder directed to salaries.

---

[45]  We are unable to accurately isolate expenditures related to cultural resource management directed to national historic sites prior to 2014-15 as codes for cultural resource management activities under the previous coding structure were not linked to specific systems (i.e., national historic sites, national parks, etc.).

[46]  In 2014-15, previous coding for the 'cultural resource inventory and evaluation' activity was integrated with 'cultural resource conservation and maintenance'. The total reported includes spending against both codes.

[47]  Most of these reporting units in the Agency's financial system represent a single national historic site but some are recorded as a collection of geographically related sites (e.g., Dawson Historical Complex).

Figure 2: Capital vs Operational Expenditures for National Historic Site Conservation Sub-Program, 2010-11 to 2015-16

Source: Data provided by Finance

### 4.3.2  EFFICIENCY OF HUMAN RESOURCE STRUCTURE

Human resources have an important impact on both the effectiveness and efficiency of the sub-program. As one senior manager noted, "a strong policy framework is of little use to Parks Canada if the Agency lacks staff with the expertise to implement it appropriately."

Parks Canada began reporting on human resources at the sub-program level in 2012-13. Data suggests a 40% reduction in human resources supporting the sub-program from 2012-13 to 2015-16 (Table 8).

**Table 8.  Full-Time Equivalents for the National Historic Site Conservation Sub-Program, 2012-13 to 2015-16**

| 2012-13 | 2013-14 | 2014-15 | 2015-16 | % Change |
|---------|---------|---------|---------|----------|
| 283 | 212 | 175 | 172 | -40% |

Source: PCA Departmental Performance Reports

In 2012, central support positions dedicated to cultural resource management were reduced by more than 50% as regional service centres were consolidated and streamlined into the current model of a decentralized National Office. Evidence suggests that this has had a significant impact on service to the field. The shift resulted in a loss of corporate knowledge and a reduction of some specialized resources (e.g., materials experts). Field unit staff also perceive the increased physical distance between support staff and sites as an added challenge in obtaining assistance from National Office. This concern has been partially mitigated by a new Community of Practice for Cultural Resource Management, using bi-monthly teleconferences to respond to common concerns and questions related to the management of cultural resources and national historic sites.

Data limitations do not enable a detailed analysis of changes in capacity at the field level. However, the Agency's human resource system (PeopleSoft, December 2016) indicates that there are currently only 21 field unit-level positions dedicated to cultural resource management; close to 50% of field units have no dedicated capacity. There is no apparent logic to how this capacity is distributed; it does not relate to the number or complexity of the national historic sites being managed in a given field unit. In some cases, existing capacity is also negligible compared to the scope of the resources being managed.

Field units without dedicated capacity for cultural resource management now rely on national historic site managers, asset managers and/or visitor experience staff to monitor the condition of cultural resources. In some cases, these staff have backgrounds in cultural resource management and can provide expert advice. The Agency has also introduced a mandatory one hour, online cultural resource management training program to provide staff with an overview of the Cultural Resource Management Policy (2013). As of July 2016, an estimated 70% of relevant employees had completed the training. While a positive step toward sensitize staff to their cultural resource responsibilities, it does not compensate for a lack of expertise at the field level.

Further, we found that most field-level staff with the cultural resource management expertise are not in management positions. As a result, they do not sit at the management table when priorities, challenges and new initiatives are being discussed. This can have the unintended impact of limiting the visibility and timely consideration of cultural resource management issues in field unit's strategic decision-making.

**This issue is addressed by Recommendation 2.**

### 4.3.3   SUSTAINABILITY OF NATIONAL HISTORIC SITE CONSERVATION

| Expectations: | Indicators: |
|---|---|
| • Asset are rationalized and investments are prioritized.<br>• Management has used available flexibilities to encourage efficient operations. | • National historic site conservation costs compared to industry standards (non-Parks Canada benchmarks).<br>• Evidence that alternatives to major projects have been identified and assessed.<br>• Evidence of asset rationalization.<br>• Evidence of asset prioritization (i.e., asset priority assessments).<br>• Extent management has used available flexibilities to encourage efficient operations. |

One of the key principles underlying both the Cultural Resource Management Policy (2013) and the Standards and Guidelines for the Conservation of Historic Places in Canada is sustainable conservation, i.e., focusing on achievable results consistent with recognized conservation standards that will ensure the long-term conservation of cultural resources, while taking into consideration the financial and human resources available.

The Standards and Guidelines indicate that the best long-term investment in an historic place is adequate and appropriate maintenance. Failure to perform routine maintenance increases deferred maintenance and can ultimately result in more significant interventions, with higher repair costs and greater risk to heritage value. In many cases, related repair costs can be significantly higher than the original costs of the maintenance that was deferred. A lack of appropriate maintenance has also been observed to decrease user satisfaction with the historic place. Development and implementation of proactive maintenance plans that include a schedule for regular inspection is thus recommended as a best practice. While we found that many of Parks Canada's larger national historic sites do have maintenance plans in place, interviewees noted that these are of limited use without the necessary human and financial resources to implement their recommendations.

To ensure the sustainability of Parks Canada's assets, an independent review (2014) recommended an annual rate of recapitalization and maintenance of 4.8% of current replacement value for the Agency's entire asset portfolio. There is ongoing debate as to whether this ratio should actually be higher for built heritage assets, given the age of infrastructure and additional cost related to the heritage standards being applied. Regardless, Parks Canada's current annual capital budget for maintenance and recapitalization is well below this level. In September 2016, the total estimated current replacement value for heritage assets at national historic sites (excluding those related to heritage canals) was shown in Maximo to be just over to $2.6 billion. Given an average annual expenditure on 'Conservation Science and Maintenance' of $38.7M from 2010-11 to 2015-16, the actual rate of annual recapitalization and maintenance for these assets over this period would have been at best 1.5%. As was discussed in section 4.2.2, the result of years of underinvestment has resulted in an estimated of $389M in deferred work for built heritage assets of national historic significance (September 2016). Funding allocated through the Federal Infrastructure Investment is based on estimates of deferred work from 2012; this funding will only address about $126M of total deferred work (i.e., 32%).

We found that many organizations, both within Canada and internationally, are challenged to maintain their inventory of cultural resources. Financial resources are identified by numerous parties to the United Nations' World Heritage Convention as one of the key threats to the ongoing preservation of heritage properties.

**The Agency has established criteria to prioritize investment of human and financial resources.**

The Cultural Resource Management Policy indicates criteria that managers should consider when determining priorities for investment of human and financial resources administered by Parks Canada. These include:

- **Heritage Value of the Resource** – giving priority to cultural resources of national significance, particularly when these are considered critical to the commemorative integrity of a site. Prioritization of cultural resources of other heritage value should consider factors such as the scarcity of similar resource and whether the resource has been recognized by another authority (e.g., provincial or municipal heritage designation).
- **Risk of Not Intervening** – considering deterioration of the resource, as well as its potential negative impact on Parks Canada's image or visitor experience or on third parties (e.g., loss of revenue, damage to adjoining properties).
- **Condition of the Resource** – extent of deterioration of the resource's physical condition or heritage value, the rate of deterioration, and level of intervention required to safeguard the resource.
- **Potential for Visitor Experience** – importance of the resource for visitor experience (either by visitor use or by its ability to convey reasons for designation) and physical accessibility of the resource.
- **Potential for External Relations** – importance of the resource to the community or public attachment to the resource, potential for collaboration with Aboriginal communities or to build meaningful relationships with other partners.

The Agency is currently undertaking analyses of options that will enable it to align financial support with costs required to ensure the sustainability of Parks Canada's entire asset base. To date, the Agency's approach to conservation of cultural resource has been to scale the level of conservation treatment to reflect the assets' contribution to program delivery, so that investments are directed to priority assets. A recent strategic assessment (2013) used set criteria to identify the relative priority of assets in Parks Canada's portfolio. Within national historic sites, heritage assets were allocated a relatively high priority

given their importance to achieving site objectives and a perceived lack of reasonable alternatives. These ratings are now used as additional criteria for determining investment priorities.

While asset rationalization has been presented as an option for reducing capital asset pressures, Parks Canada's policy framework acts as an important barrier to the disposal of heritage assets. However, other alternatives for heritage assets at national historic sites could include maximization of building use (e.g., adaptive re-use for commercial or other public uses consistent with conservation objectives) and facilitating opportunities for new stewards to protect heritage places. The best candidates for such alternatives would be those assets that now show the highest current importance or potential for visitor experience or external relations.

We observed an unintended negative impact of this approach to prioritization of investment. The Cultural Resource Management Policy recognizes that there will be cultural resources for which the Agency does not have sufficient human and financial resources to invest in their conservation. These must be "treated in a respectful manner," with best efforts undertaken to conserve their heritage value. During site visits, we were presented with numerous examples of cultural resources (particularly built heritage and archaeological sites) that were experiencing significant deterioration with no foreseeable plans for intervention. This issue was most prevalent in locations with limited physical accessibility, visitor experience and/or community attachment.

While Field Unit Superintendents understand the Agency's responsibilities for maintaining these unique and irreplaceable historic assets, they noted that all investment decisions must be balanced against other Parks Canada objectives. Program managers pointed to the lack of any central source of funding to specifically support the conservation of cultural resources at national historic sites as a gap. Funds dedicated to 'conservation and restoration' in the Agency's current investment program are specifically directed to support projects for the active management of natural resources.

# 5   CONCLUSIONS AND RECOMMENDATIONS

**Relevance**

Overall, we found that the National Historic Site Conservation Sub-program is relevant and consistent with the priorities, roles and responsibilities of both Parks Canada and the Government of Canada. While the cultural resources managed by Parks Canada are considered to be unique and irreplaceable, they are also at continual risk. The need to protect and conserve the heritage value of these resources justifies a continued need for the sub-program. Expected results for the sub-program reflect the Agency's mandate to ensure the commemorative integrity of national historic sites on Parks Canada lands.

**Performance**

We found that Parks Canada's Cultural Resource Management Policy (2013) provides an adequate management framework for the program and is more explicit about requirements and accountabilities than the previous policy.

We found that Parks Canada has developed a Commemorative Integrity Statement and a management plan for the majority of its national historic sites. These are critical to the effective management of the sub-program. While we estimate that about 70% of these management plans are now outdated, Parks Canada has developed a schedule showing that all sites will have an updated document by 2022. There may also be a need to review some sites' Commemorative Integrity Statements to ensure that they continue to reflect advances in our knowledge or interpretation of history.

Given its mandate, maintaining the commemorative integrity of national historic sites is a key objective for the Agency. We found that Parks Canada exceeded its target to improve the Agency's overall average rating for the commemorative integrity of national historic sites by March 2013. However, this trend is no longer reported. Most existing commemorative integrity assessments (≥72%) are more than five years old.

Our evaluation of the Agency's performance in achieving its intended outcomes for the sub-program can be divided into three broad areas:

- **Condition of Heritage Buildings and Engineering Works:** Given the significant work that Parks Canada has undertaken since 2009 to improve knowledge of its asset base, it is not possible to provide a reliable estimate of the extent to which the overall condition of the Agency's heritage buildings and structures has been maintained or improved. While there is evidence of specific projects completed to maintain or improve the condition of a number of targeted heritage assets, sub-program funding was insufficient to address most deferred work. Federal Infrastructure Investment funding introduced in 2014 will result in significant condition improvements across the Agency's entire asset base but is insufficient to address deficiencies identified since 2012.

  During the period under evaluation, Parks Canada also made improvements in its project management practices related to capital investments including the introduction of a new process to assess the impact of proposed interventions on cultural resources.

- **Condition of Historical and Archaeological Objects:** The Agency reports having more or less consistently achieved its target to maintain 90% of its collection of historical objects of national significance in fair or good condition. Our ability to confirm these results or conclude on the trend in condition was impeded by issues with data quality. In 2016, Parks Canada initiated the installation of a new cultural resource information management system. Given the poor state of the Agency's existing databases, data migration may be an issue.

  We found that Parks Canada's objects are stored in varying conditions of security and environmental control with potential impacts on the stability of their condition. Progress towards consolidation of the Agency's collection from its existing collection warehouses into a single, custom-built facility that would meet museological standards has been slow. In the interim, large parts of the Agency's collection remain at risk.

- **Condition of Archaeological Sites:** Parks Canada lacks a centralized record of archaeological sites or their condition that we could use to estimate the number of sites under threat. Those linked to national historic sites are generally reported to be in good condition, but these represent a small sub-set of the Agency's total inventory of archaeological sites. While we found a lack of coherent criteria used to prioritize interventions against its corporate target, Parks Canada has made significant progress towards identifying and reducing threats to these select archaeological sites.

The vast majority of the sub-program's resources were dedicated to conservation and maintenance. However, work required to assess the condition of heritage structures, objects and archaeological sites and provide appropriate conservation have exceeded Parks Canada's capacity to deliver. The Agency has responded by establishing criteria to prioritize investment of human and financial resources, focusing efforts on cultural resources of national historic significance, and is undertaking analyses of options that will enable it to align available financial support with costs required to ensure the sustainability of Parks Canada's entire asset base.

**RECOMMENDATIONS AND MANAGEMENT RESPONSE**

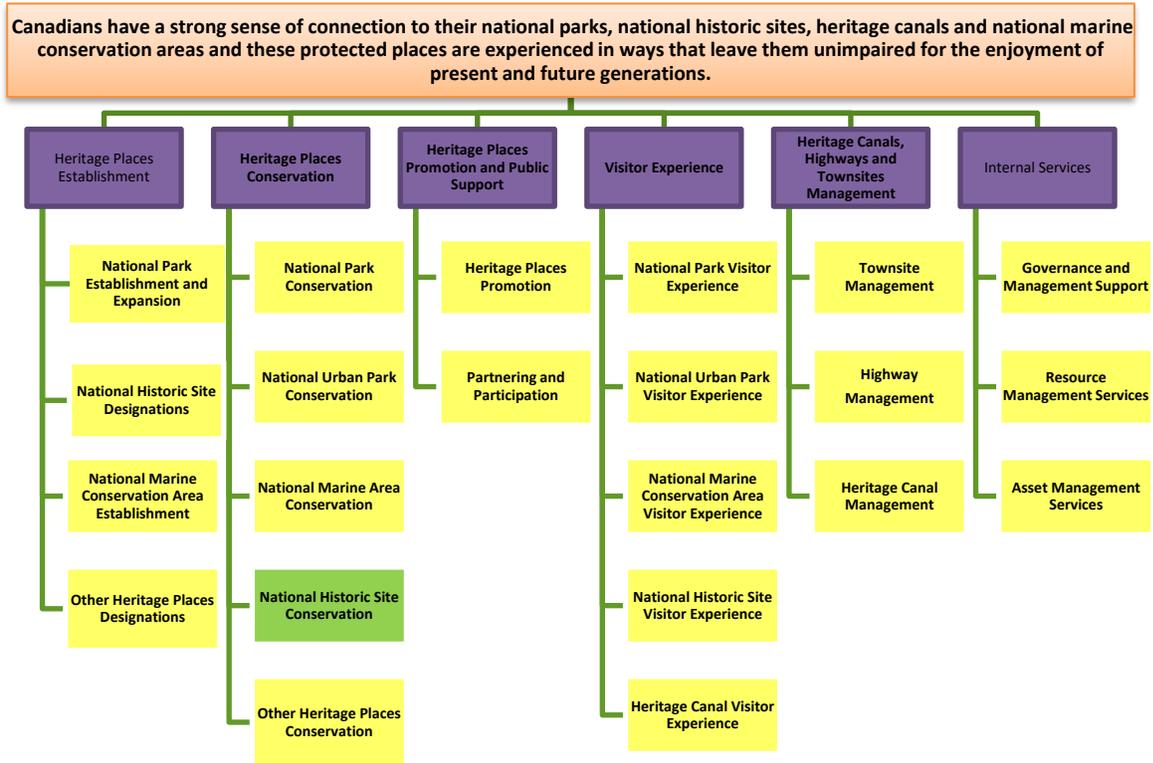| **Recommendation 1:** The Vice-President, Indigenous Affairs and Cultural Heritage, should complete and disseminate guidance required to support implementation of the Cultural Resource Management Policy. | | |
|---|---|---|
| **Context:** Parks Canada intended its Cultural Resource Management Policy (2013) to be supplemented by a series of guidelines designed to support its effective and consistent implementation. Progress remains to complete and communicate these guidelines to staff. | | |
| **Management response:** | | **Completion Date** |
| Agree. Since 2015, supporting tools related to cultural resource impact analysis were added to the cultural resource management tool box. In addition, Parks Canada is developing e-modules related to the Standards and Guidelines for the Conservation of Historic Places in Canada in order to further support implementation of the Cultural Resource Management Policy. | | March 2020 |
| **Management Action Plan Deliverables** | **Responsible Party** | **Timeline** |
| 1.1 E-modules related to the *Standards and Guidelines for the Conservation of Historic Places in Canada* are made available and communicated to staff. | Director, Cultural Heritage Policies Branch | March 2020 |

| Recommendation 2: The Vice-President, Indigenous Affairs and Cultural Heritage, should review and propose solutions with respect to the human resources management structure for cultural resource management (CRM) at the Agency's field units to ensure appropriate capacity. | |
|---|---|
| **Context:** Close to 50% of field units have no dedicated capacity for cultural resource management. Existing capacity is not distributed according to the number or complexity of the national historic sites being managed. Further, few managers had relevant experience in cultural resource management. | |
| **Management response:** | **Completion Date** |
| Agree. Since the launch of the Federal Infrastructure Initiative in 2015, cultural resources management capacity i.e. built heritage, archaeological and historical objects conservation and archaeological expertise dedicated to supporting field units has been added. <br> Field unit dedicated cultural resource management capacity will be assessed at the end of the Federal Infrastructure Initiative in 2020 to ensure that the appropriate level of cultural resource management capacity is in place to respond to future needs. | September 2020 |

| Management Action Plan Deliverables | Responsible Party | Timeline |
|---|---|---|
| 2.1 Through an assessment, field unit dedicated cultural resource management capacity will be reviewed at the end of the Federal Infrastructure Initiative in 2020. <br> Should the assessment indicate that cultural resource management capacity adjustments are necessary, changes will be made subject to the availability of financial resources. | Director, Cultural Heritage Policies Branch, in consultation with Asset Management, Project Management, Impact Assessment, Investment and Operations. | September 2020 |

| Recommendation 3: The Vice-President, Indigenous Affairs and Cultural Heritage, should review the structure for commemorative integrity assessments to ensure that it is effective in measuring the trend in commemorative integrity at Parks Canada's national historic sites. | | |
|---|---|---|
| **Context:** Commemorative integrity (CI) assessments are intended to produce consistent, reliable, and comprehensive information about the state of commemorative integrity at national historic sites administered by Parks Canada. Since 2013, the methodology for CI assessments of national historic sites has undergone a number of changes, including: reducing the frequency of assessments, reducing the number of sites where a CI assessment is required, and placing reliance on existing data. | | |
| **Management response:** | | **Completion Date** |
| Agree. Given the direct link between commemorative integrity assessment results, State of Assessments and management planning, Cultural Heritage will maintain the current methodology until the end of the current management plan 10-year schedule (2014 to 2023). Cultural Heritage will launch a review of the methodology in 2022 and will implement changes unfolding from the review if need be. | | March 2023 |
| **Management Action Plan Deliverables** | **Responsible Party** | **Timeline** |
| 3.1 A review of commemorative integrity assessment methodology, including effectiveness in measuring trends, will be completed. | Director, Cultural Heritage Policies Branch, in consultation with Strategic Planning and Reporting. | March 2023 |

| Recommendation 4: The Vice-President, Indigenous Affairs and Cultural Heritage, should review performance measures for historical objects to determine an effective method for monitoring and reporting on the stability of its collection. | | |
|---|---|---|
| **Context:** The Agency's traditional performance expectation and targets with respect to historical and archaeological objects has focused on the condition of objects in the collection and set various targets related to condition of objects (e.g., maintain 90% of the objects in fair or good condition). The expectation changed recently to focus on the "percentage of cultural resources in Parks Canada's care that are safeguarded." Although the expectation changed, the indicator used to measure achievement of the result was not modified (i.e., still assessed based on percentage of objects in a given condition). | | |
| **Management response:** | | **Completion Date** |
| Agree. At the time of the evaluation field work, the Departmental Results Framework (DRF) for the Agency still included the number/percentage of cultural and archeological objects in fair or good condition as one metric contributing to the overall indicator related to the percentage of cultural resources in its care that would be safeguarded.<br>However, in February 2018, the Agency updated aspects of its DRF methodology, including replacing the previous metric with a new one focusing on the percentage of cultural and archeological objects that were stored in appropriate environmentally-controlled and secure conditions and were appropriately monitored, consistent with the recommendation. | | February 2018 |
| **Management Action Plan Deliverables** | **Responsible Party** | **Timeline** |
| None required | | |

| Recommendation 5: The Vice-President, Indigenous Affairs and Cultural Heritage, should document the process and criteria used to select priority archaeological sites to be tracked as part of the corporate performance framework. | | |
| :--- | :--- | :--- |
| Context: Since 2014-15, Parks Canada has a performance expectation to maintain cultural resources of national significance at targeted national historic sites administered by the Agency.  One indicator and target for judging success against this expectation was to assess and reduce threats at a specific number of national historic sites by a specific target date (i.e., at six archaeological sites by March 2015 and 12 archaeological sites by 2018). While progress was made towards meeting the corporate target, there was no rationale or criteria used for selecting these particular sites as opposed to others that face threats. This indicator and target are proposed for inclusion in the Agency's performance information profile (PIP) currently under development. | | |

| Management response: | | Completion Date |
| :--- | :--- | :--- |
| Agree. The Indigenous Affairs and Cultural Heritage Directorate will review and document the process and criteria used to identify priority archaeological sites for purposes of future corporate performance monitoring. | | September 2020 |

| Management Action Plan Deliverables | Responsible Party | Timeline |
| :--- | :--- | :--- |
| 5.1. Archaeology section will develop a set of criteria to assess key archaeological sites at risk and work with Operations to select sites to be tracked as part of the corporate performance framework. | Director, Archaeology and History Branch, in collaboration with Operations. | September 2020 |

## APPENDIX A: STRATEGIC OUTCOME AND PROGRAM ALIGNMENT ARCHITECTURE

Canadians have a strong sense of connection to their national parks, national historic sites, heritage canals and national marine conservation areas and these protected places are experienced in ways that leave them unimpaired for the enjoyment of present and future generations.

| Heritage Places Establishment | Heritage Places Conservation | Heritage Places Promotion and Public Support | Visitor Experience | Heritage Canals, Highways and Townsites Management | Internal Services |
|---|---|---|---|---|---|
| National Park Establishment and Expansion | National Park Conservation | Heritage Places Promotion | National Park Visitor Experience | Townsite Management | Governance and Management Support |
| National Historic Site Designations | National Urban Park Conservation | Partnering and Participation | National Urban Park Visitor Experience | Highway Management | Resource Management Services |
| National Marine Conservation Area Establishment | National Marine Area Conservation | | National Marine Conservation Area Visitor Experience | Heritage Canal Management | Asset Management Services |
| Other Heritage Places Designations | National Historic Site Conservation | | National Historic Site Visitor Experience | | |
| | Other Heritage Places Conservation | | Heritage Canal Visitor Experience | | |

The sub-program covered by this evaluation is highlighted in green.

## Appendix B: Evolution of Corporate Targets for NHS Conservation

**A1. Expected Results of Heritage Places Conservation (PA2), 2010-11 to 2016-17**

| Fiscal year | Expected Results | Performance Expectation/Indicator |
|---|---|---|
| 2015-16 to 2016-17 | Cultural resources of national significance at targeted national historic are maintained. | Number of targeted national historic sites where cultural resources of national significance are maintained. **Target**: 60 by March 2018. |
| | Condition of heritage assets in poor or very poor condition is improved to fair or good. | Percentage of assets assessed to be in poor or very poor condition that have improved to fair or good. **Target**: 100% by March 2020. |
| 2014-15 | The state of cultural resources of national significance in national historic sites is maintained or improved. | Number of national historic sites whose state of cultural resources of national significance have been maintained or improved. **Target**: 55 by March 2015. |
| 2013-14 | The state of cultural resources of national significance (level 1) in national historic sites is improved. | 60% of the national historic sites where the condition of cultural resources of national significance rated as poor in their initial assessment are improved by March 2014. |
| 2012-13 | | 70% of the national historic sites where the condition of cultural resources of national significance (level 1) rated as poor are improved within 5 years of original assessment. |
| 2011-12 | The state of cultural resources in national historic sites is improved. | 70% of the condition of cultural resources and management practices elements of commemorative integrity rated as poor is improved within 5 years. |
| 2010-11 | | |

**A2. Performance Indicators for Condition of Archaeological Sites, 2014-15 to 2017-18**

| Fiscal year | Expected Results | Performance Expectation/Indicator |
|---|---|---|
| 2016-17 | Cultural resources of national significance at targeted national historic sites administered by Parks Canada are maintained. | Number of archaeological sites where threats have been assessed and reduced. **Target**: 12 by March 2018 |
| 2015-16 | | |
| 2014-15 | The condition of cultural resources of national significance administered by Parks Canada is maintained or improved. | Number of archaeological sites where threats have been assessed and reduced. **Target**: 6 by March 2015 |

**A3. Performance Indicators for Condition of Built Cultural Resources, 2010-11 to 2016-17**

| Fiscal year | Expected Results | Performance Expectation/Indicator |
|---|---|---|
| 2016-17 | Cultural resources of national significance at targeted national historic sites administered by Parks Canada are maintained. | Percentage of required cultural resource impacts assessments that include measures to mitigate or reduce impacts to cultural resources. **Target** : 100% annually |
| 2015-16 | | |
| 2015-16 | Condition of heritage assets in poor or very poor condition is improved to fair or good. | Percentage of heritage assets assessed to be in poor or very poor condition that have improved to fair or good. **Target**: 100% by March 2020 |
| 2014-15 | The condition of cultural resources [of national significance] administered by Parks Canada is maintained or improved. | Number of buildings rated as poor is improved. **Target**: 3 by March 2015 |
| 2013-14 | | 60% of national historic sites where the condition of historic buildings and structures of national significance rated as poor in their initial assessment are improved by March 2014. |
| 2012-13 | | 60% of national historic sites where the condition of historic buildings and structures of national significance (level 1) that are in poor condition are improved within 5 years of original assessment. |
| 2011-12 | | Improve the condition of 60% of historic buildings and structures administered by Parks Canada that are in poor condition by March 2013. |
| 2010-11 | | |

**A4.  Performance Indicators for Condition of Historical Objects, 2010-11 to 2016-17**

| Fiscal year | Expected Results | Performance Expectation/Indicator |
|---|---|---|
| 2016-17 | Cultural resources of national significance at targeted national historic sites administered by Parks Canada are maintained. | Percentage of objects of national significance requiring conservation are in stable condition. **Target**: 90% by March 2020. |
| 2015-16 | | Percentage of objects of which conditions were unknown are assessed. **Target**: 100% by March 2016 |
| 2014-15 | The condition of cultural resources of national significance administered by Parks Canada is maintained or improved. | Percentage of historical objects that are in fair or good condition. **Target**: 90% by March 2015 |
| 2014-15 | | Number of objects whose condition have been reassessed. **Target**: 5000 objects reassessed by March 2015 |
| 2013-14 | (no indicator) | (no target) |
| 2012-13 | The condition of cultural resources [of national significance] administered by Parks Canada is maintained or improved. | 90% of historic objects of national significance (level 1) are maintained in good or fair condition by March 2013. |
| 2011-12 | | Maintain 90% of historic objects in good or fair condition by March 2013. |
| 2010-11 | | |

## APPENDIX C: EVALUATION MATRIX

| A. RELEVANCE | | | | |
|---|---|---|---|---|
| **Core Question** | **Specific Questions** | **Expectations** | **Indicators** | **Data Sources/Methods** |
| 1. To what extent is there a continued need for national historic site conservation? | • To what extent is there a continued need for national historic site conservation?<br>• To what extent is national historic site conservation responsive to the needs of Canadians? | • The sub-program addresses a continued identified need.<br>• The sub-program is responsive to the needs of Canadians. | • Reported threats to the condition and commemorative integrity of national historic sites.<br>• Evidence of Canadians' support for national historic site conservation. | • Document and literature review. |
| 2. To what extent is national historic site conservation aligned with government and Agency priorities? | • To what extent is the sub-program aligned with federal government priorities? | • Sub-program objectives align with Government of Canada priorities.<br>• Sub-program objectives align with Agency priorities. | • Degree to which sub-program aligns with Government of Canada Whole of Government Framework.<br>• Degree to which sub-programs align with Agency priorities. | • Document and literature review. |
| 3. To what extent is national historic site conservation aligned with federal roles and responsibilities? | • To what extent is the sub-program aligned with Parks Canada Agency roles and responsibilities? | • The sub-program is aligned with Parks Canada Agency's legislative and policy mandate. | • Federal legislation, policies and directive indicate relevant roles and responsibilities.<br>• Parks Canada's mandate, policies and directives indicate relevant roles and responsibilities. | • Document and literature review. |
| B. PERFORMANCE | | | | |
| **Core Question** | **Specific Questions** | **Expectations** | **Indicators** | **Data Sources/Methods** |
| 4. To what extent are outputs being produced as planned? | • To what extent are outputs being produced as planned related to:<br>   ○ Inventory and evaluation | • All national historic sites have a Commemorative Integrity Statement. | • Number of national historic site with approved Commemorative Integrity Statement. | • Document review.<br>• File review.<br>• Database analysis.<br>• Survey of Parks Canada's Cultural |

| | | | | |
|---|---|---|---|---|
| | o Setting priorities for management<br>o Conservation and maintenance<br>o Monitoring and reporting | • Management plans/statements have been developed for all national historic sites.<br>• Commemorative integrity of national historic site have been assessed.<br>• Where required, national historic sites are completing State of the Site Reports. | • Number of national historic sites with up-to-date management plan/statement.<br>• Number of national historic sites where commemorative integrity has been assessed and/or re-assessed.<br>• Number of national historic sites with an up-to-date State of the Site Report (vs. number required) | Resource Management Community.<br>• Site visits.<br>• Interviews.<br>• Comparative analysis. |
| 5. To what extent is the Agency making progress towards its outcomes for the condition of built heritage assets at national historic sites? | • To what extent is the condition of cultural resources at national historic sites known?<br>• To what extent are cultural resources (built assets) at national historic sites being maintained or improved? | • The condition of cultural resources at national historic sites is known.<br>• The condition of cultural resources of national significance national historic sites is being maintained.<br>• Major projects adhere to Parks Canada and industry project standards, including consideration of impact on cultural resources.<br>• Projects are completed on time, on budget and within scope.<br>• Management has used available flexibilities to encourage efficient operations . | • Condition of cultural resources at national historic sites, current and trend.<br>• Evidence of relevant planned/completed maintenance and conservation work.<br>• Estimates of deferred work.<br>• Evidence that major projects follow Parks Canada Agency Project Management Standard.<br>• Evidence of assessment of impact of interventions on cultural resources.<br>• Comparison of project approvals to project delivery. | • Document review.<br>• File review.<br>• Database analysis (Maximo, Milestone Reporting Tool).<br>• Survey of Parks Canada Agency cultural resource management community.<br>• Site visits.<br>• Interviews.<br>• Comparative analysis. |

| | | | | |
|---|---|---|---|---|
| 6. To what extent is the Agency making progress towards its outcomes for the condition of objects? | • To what extent has progress been made to assess the condition of objects?<br>• To what extent are historic and archaeological objects maintained in stable condition? | • Quality information exists to track Parks Canada Agency's inventory of cultural resources.<br>• Records and documentation are maintained in appropriate standards.<br>• Progress is being made to assess condition of all objects of national significance (by 2016).<br>• Condition of 5000 objects was reassessed by March 2015.<br>• Historic and archaeological objects are maintained in stable condition.<br>• 90% of historic objects of national significance were maintained in good or fair condition by March 2013.<br>• Interventions to objects adhere to Parks Canada Agency and industry standards.<br>• Parks Canada collections management adheres to industry standards. | • Evidence of quality assurance/quality control for information systems, records and documentation, including Agency's ability to access reliable and current data on the inventory of resources at national historic sites.<br>• Comparison of Parks Canada information systems to Industry benchmarks.<br>• Trend in number of objects where condition assessed/unknown, per fiscal year.<br>• Evidence of plans to complete assessment of objects where condition unknown.<br>• Number of objects reassessed by March 2015.<br>• Trend in known condition of objects.<br>• Evidence of plans/actions to maintain condition of objects.<br>• Evidence of application of standards for conservation of objects.<br>• Comparison of Parks Canada collections management to industry standards. | • Document review.<br>• File review.<br>• Database analysis (Artifact Information System).<br>• Site visits.<br>• Interviews.<br>• Comparative analysis. |

| 7. To what extent is the Agency making progress towards its outcomes for the condition of archaeological sites? | • To what extent has progress been made to assess threats to archaeological sites?<br>• To what extent has progress been made to reduce threats to archaeological sites? | • The Agency has a rationale for prioritization of interventions at archaeological sites.<br>• Progress is being made to assess and reduce threats to:<br>→ 6 archaeological sites (by March 2015).<br>→ 12 archaeological sites (by 2018). | • Evidence of analysis/criteria for prioritization of interventions at archaeological sites.<br>• Evidence of actions taken/planned at (targeted) archaeological sites to: (1) assess threats; (2) analyse options to reduce threats; and/or (3) reduce threats. | • Document review.<br>• File review.<br>• Database analysis.<br>• Survey of Parks Canada cultural resource management community.<br>• Site visits.<br>• Interviews. |
|---|---|---|---|---|
| **C. EFFICIENCY AND ECONOMY** | | | | |
| **Core Question** | **Specific Questions** | **Expectations** | **Indicators** | **Data Sources/Methods** |
| 8. To what extent is the program efficient and economical? | • Is national historic site conservation delivered at the lowest possible cost to the Agency?<br>• How does the Agency ensure that its national historic site conservation activities are sustainable? | • Costs of national historic site conservation are known and verified.<br>• Costs of national historic site conservation are reasonable given nature of sub-program and compared to industry standards.<br>• Asset are rationalized and investments are prioritized.<br>• Management has used available flexibilities to encourage efficient operations. | • Difference between planned and actual spending (overall and project-specific).<br>• Extent management has used available flexibilities to encourage efficient operations<br>• Perspectives on sub-program efficiency.<br>• National historic site conservation costs compared to industry standards (non-Parks Canada benchmarks).<br>• Evidence that alternative to major projects have been identified and assessed.<br>• Evidence of asset rationalization. | • Database analysis (i.e., STAR, Milestone Reporting Tool, Maximo).<br>• Document and literature review.<br>• Key informant interviews.<br>• Survey of Parks Canada cultural resource management community.<br>• Comparative analysis. |

| | | | <ul><li>Evidence of asset prioritization.</li><li>Extent management has used available flexibilities to encourage efficient operations.</li></ul> | |
|---|---|---|---|---|

## APPENDIX D: LIST OF SITES VISITED FOR EVALUATION, BY PROVINCE/TERRITORY

| Location | Sites Visited | Location | Sites Visited |
|---|---|---|---|
| **Yukon** | Dawson Historical Complex<br>Former Territorial Court House National Historic Site<br>S.S. Keno National Historic Site<br>Dredge No. 4 National Historic Site<br>Bear Creek Compound (Collection Facilities) | **Quebec** | Fortifications of Quebec National Historic Site:<br>St-Louis Forts and Château National Historic Site<br>Grosse Ile and Irish Memorial National Historic Site<br>Sir George-Etienne Cartier National Historic Site<br>Fort Chambly National Historic Site<br>Coteau-du-Lac National Historic Site<br>Forges du Saint-Maurice National Historic Site<br>Louis-Joseph Papineau National Historic Site<br>Québec Service Centre Collection (2) |
| **British Columbia** | Fort Rodd Hill National Historic Site<br>Fisgard Lighthouse National Historic Site<br>Fort Langley National Historic Site<br>Gulf of Georgia Cannery National Historic Site | **Nova Scotia** | Halifax Citadel National Historic Site<br>York Redoubt National Historic Site<br>Grand Pré National Historic Site<br>Fortress of Louisbourg National Historic Site<br>Alexander Graham Bell National Historic Site<br>Dartmouth Service Centre Collection |
| **Alberta** | Cave and Basin National Historic Site<br>Banff Park Museum National Historic Site<br>Rocky Mountain House National Historic Site<br>Bar U Ranch National Historic Site | **Prince Edward Island** | Green Gables Heritage Place<br>Port-La-Joye—Fort Amherst National Historic Site<br>Ardgowan National Historic Site<br>Province House National Historic Site<br>Dalvay-by-the-Sea National Historic Site |
| **Saskatchewan** | Batoche National Historic Site<br>Motherwell Homestead National Historic Site<br>Battle of Tourond's Coulee/Fish Creek National Historic Site | **Newfoundland** | L'Anse aux Meadow National Historic Site<br>Signal Hill National Historic Site<br>Cape Spear National Historic Site |
| **Ontario** | Fort Henry National Historic Site<br>Fort Wellington National Historic Site<br>Battle of the Windmill National Historic Site<br>Bellevue House National Historic Site<br>Laurier House National Historic Site<br>Fort George National Historic Site<br>Battlefield of Fort George National Historic Site<br>Fort Mississauga National Historic Site<br>HMCS Haida National Historic Site<br>National Capital Region Collection | **Manitoba** | Lower Fort Garry National Historic Site<br>The Forks National Historic Site<br>Winnipeg Service Centre Collection |

## APPENDIX E: COMMEMORATIVE INTEGRITY ASSESSMENT INDICATORS

The following table compares the indicators used to assess the commemorative integrity of national historic sites that were used in baseline assessments against those now in use by the Agency.

| Commemorative Integrity Evaluations (Baseline: 2001-2012) | Commemorative Integrity Assessments (Streamlined: 2013-present) |
|---|---|
| **Resource Condition** | |
| Overall:<br>• Resources Related to the Reason for Designation<br>• Resources Not Related to the Reasons for Designation | Overall:<br>• Resources of National Significance<br>• Resources of Other Heritage Value |
| Cultural resource directly related to the reasons for designation:<br>• Landscapes and Landscape Features<br>• Buildings and Structures<br>• Archaeological Sites<br>• Objects (Historical and Archaeological)<br>• Designated Place | Cultural Resources of National Historic Significance:<br>• Landscapes and Landscape Features<br>• Buildings and Engineering Works<br>• Archaeological Sites<br>• Objects of National Historic Significance<br>• Historical Objects<br>• Archaeological Objects |
| Resources not related to the reasons for designation:<br>• Landscapes and Landscape Features<br>• Buildings and Structures<br>• Archaeological Sites<br>• Objects (Historical and Archaeological)<br>• Designated Place | Key Cultural Resources of Other Heritage Value:<br>• Landscapes and Landscape Features<br>• Buildings and Engineering Works<br>• Archaeological Sites<br>• Objects (Historical and Archaeological) |
| Natural Resources | (not applicable) |
| **Effectiveness of Communications** | |
| Overall:<br>• Reasons for Designation as a National Historic Site<br>• Messages Not Related to the Reasons for Designation<br>• Audience Understanding<br>• National Historic Site General Values<br>• Effectiveness of Media<br>• Range and Complexity of Perspectives Presented | Sharing Heritage Value:<br>• Learned Something About Cultural Heritage<br>• Understanding of the Contribution of the NHS to the History of Canada |
| **Management Practices** | |
| Overall:<br>• Inventory and Cultural Resource Evaluation<br>• Respect for Cultural Resource Management Principles and Practices<br>• Records<br>• Maintenance Programs<br>• Monitoring and Remedial Action | Threats and Agency Response:[48]<br>• Threats due to Natural Processes (8)<br>• Threats due to Human Actions (12)<br><br>Note: Threats are assessed for immediacy and impact (H/M/L). Score = (no. threats rated/total) x 100 |

---

[48]   A similar threat/response survey was included in previous assessment methodology to add context to assessment but threats assessed were not scored or factored into final roll-up.

## APPENDIX F: DEFINITIONS OF RESOURCE CONDITION

Parks Canada's Commemorative Integrity Assessment Template (2015) provides a definition for the resource condition of: (i.e., buildings, engineering work and landscapes), archaeological sites, and objects. These definitions are provided below.

The first table also contrasts the definition of **asset condition** used by Parks Canada's Asset Management Services against those used to rate the resource condition of heritage buildings and engineering works.

| Condition | Definition of Condition for Buildings and Engineering Works | |
|---|---|---|
| | **Commemorative Integrity Assessment** | **Asset Management Services[49]** |
| **A: Good** | Stable. No appreciable deterioration or loss of critical components (e.g., foundations, walls, roofing, drainage), including character-defining elements. | Identified deficiencies have no or negligible impact on the functional performance (or level of service) of the asset. No foreseeable rehabilitation work required as long as regular preventive maintenance and minor corrective maintenance work is carried out in a timely manner. |
| **B: Fair** | Minor deterioration or loss of critical components (including character-defining elements) requiring some level of corrective work; other components placed at minor risk if condition not improved in required time frame. | Identified deficiencies have a significant impact on the functional performance (or level of service) of the asset. The known deficiencies in each of the asset's components are unrelated so that there are no or negligible compounding and detrimental effect on one another. One or more of the asset's components need rehabilitation work, but do not entail prolonged closure of the asset. |
| **C: Poor** | Critical components (including character-defining elements) no longer maintain level of original design or purpose (where that original purpose or performance is relevant to the heritage value of the resource), or is substandard to the point where operation of resource should be suspended until condition is improved; other components will suffer if condition not rectified within required time frame; abnormal or accelerated deterioration is evident. | One or more components need rehabilitation work to the extent that a major intervention is required to stabilize, consolidate, reinforce or reconstruct the asset. The known deficiencies in each of the components will have a compounding detrimental effect on one another. |
| **D: Very Poor** | Not applicable. | The asset is currently unsafe, unstable or unusable and recapitalization of the asset is likely equal or in excess of the replacement cost. |

---

[49]    Source: Parks Canada Asset Report Card (2016)

| Condition | Definition of Condition for Archaeological Sites and Objects | |
| --- | --- | --- |
| | **Archaeological Sites** | **Objects** |
| **A: Good** | Stable. No appreciable damage to or deterioration of known archaeological resources. In general, 71% or more of the site and its archaeological resources, since managed by Parks Canada, are preserved. | Stable. Object is structurally, physically and chemically sound. Preventive conservation and preservation measures such as monitoring, use of proper storage and display materials, security measures and regular cleaning, assessment of object compatibility for display/ storage and routine maintenance of mechanized objects have been or must be applied. |
| **B: Fair** | Minor damage to or deterioration of known archaeological resources. In general, 30% – 70% of the site and its archaeological resources, since managed by Parks Canada, are preserved.<br><br>Stable (↔): No mitigation measures required. No active threat.<br><br>Threatened (↓): May require preservation, enhanced monitoring, or mitigation. | Object has lost some of its stability (minor loss, damage or deterioration) but can be stabilized to good through the implementation of preventive conservation, preservation measures and/or remedial conservation.<br><br>Issue may have to be dealt with immediately, especially if the cause is still active or if the safety of the object and the visitor is at risk. |
| **C: Poor** | Major damage to or deterioration of known archaeological resources. In general, 1% - 29% of the site and its archaeological resources, since managed by Parks Canada, are preserved.<br><br>Stable (↔): No mitigation measures required. No active threat.<br><br>Threatened (↓): Requires urgent preservation or mitigation (e.g. salvage). | Object is unstable. It has suffered important loss (structurally, physically or chemically).<br><br>The degree of intervention will vary:<br>• Preventive conservation, preservation or remedial conservation.<br>• Full conservation or restoration. Treatments can be complex and may involve major intervention. An object in poor condition may require dedicated time and resources. |

## APPENDIX G: PROGRESS ON ASSESSING AND REDUCING THREATS TO ARCHAEOLOGICAL SITES AT SELECT NATIONAL HISTORIC SITES

| Progress Target | National Historic Site | Date of Last Assessment | Condition of Archaeological Sites [a] | | | Progress on Addressing and Reducing Threats (to November 2017) |
|---|---|---|---|---|---|---|
| | | | Related to Designation | Not Related to Designation | Summary | |
| **March 2015** | **York Factory** | 2014 | 🟡 Fair | 🟡 Fair | 🟡 Fair | Ongoing. Threats from site erosion were assessed; some mitigations were implemented and additional options are being assessed. |
| | **Fort Henry** | 2016 | 🟢 Good | 🟢 Good | 🟢 Good | Ongoing. Threats from infrastructure works were assessed; mitigation options are being assessed. |
| | **Fortifications of Quebec** | 2016 | 🟢 Good | n/a [b] | 🟢 Good | Complete. Threats from infrastructure works were assessed and mitigated during works. |
| **March 2015 / 2018** | **Rocky Mountain House** | 2016 | 🟢 Good | Not rated | 🟢 Good | Complete. Threats from site erosion were assessed and reduced by appropriate mitigation. |
| | **Fortress of Louisbourg** | 2011 | 🔴 Poor | 🟢 Good | 🔴 Poor | Ongoing. Threats from site erosion and infrastructure works were assessed; some mitigations implemented and additional options are being assessed. |
| | **Prince of Wales Fort** | 2008 | Not rated | 🟡 Fair | 🟡 Fair | Complete. Threats from infrastructure works were assessed and mitigated. |
| **March 2018** | **Batoche** | 2009 | 🟢 Good | 🟢 Good | 🟢 Good | Ongoing. Threats from site erosion were assessed; mitigation options are being assessed. |
| | **Chilkoot Trail** | 2004 | 🟡 Fair | 🟡 Fair | 🟡 Fair | Ongoing. Threats from vegetation and infrastructure works were assessed; some mitigations implemented and additional options being assessed. |
| | **Riel House** | 2001 | n/a | 🟢 Good | 🟢 Good | Complete. Threats from infrastructure works were assessed; mitigations are being planned and/or implemented related to infrastructure projects. |
| | **Fort Lennox** | 2010 | 🟢 Good | 🟡 Fair | 🟢 Good | Ongoing. Threats from infrastructure works were assessed; mitigations are being planned and/or implemented related to infrastructure works. |
| | **Lower Fort Garry** | 2011 | 🟡 Fair | 🟡 Fair | 🟡 Fair | |
| | **Halifax Citadel** | 2006 | 🟢 Good | n/a | 🟢 Good | |
| | **Fort Malden** | 2001 | 🟡 Fair | 🟢 Good | 🟡 Fair | |
| | **Point-au-Père Lighthouse** | 2009 | 🟢 Good | n/a | 🟢 Good | |
| | **Fort Mississauga** | 2011 | 🟢 Good | 🟢 Good | 🟢 Good | |

Notes:

a – Condition rating is valid as of date of last commemorative integrity assessment; may not reflect current status given recent progress to reduce threats.

b – Condition rating is 'not applicable' (n/a) if the national historic site contains no related archaeological sites of this description.