

# Evaluation of Parks Canada's Other Heritage Places Programs

Final – July 2015

Office of Internal Audit and Evaluation

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## EXECUTIVE SUMMARY

The Other Heritage Places Designations and Other Heritage Places Conservation sub-programs of the Parks Canada's Program Alignment Architecture (PAA) account for less than 1% of the Agency's total annual expenditures. The sub-programs involve numerous initiatives intended to support and enhance the protection of a range of important historical and natural heritage resources. We examined six of these in detail, i.e., the Federal Heritage Buildings Program, the Heritage Lighthouse Program, the Heritage Railway Stations Program, the National Program for Grave Sites of Canadian Prime Ministers, the World Heritage Sites Program and the Canadian Heritage Rivers Program. While these initiatives have a low materiality and corporate risk, the evaluation of the sub-programs was identified as a commitment in the Agency's Multi-Year Evaluation Plan 2013-14 to 2017-18. The evaluation is consistent with requirements under the Treasury Board (TB) *Policy on Evaluation* to evaluate all direct program spending over a five-year period.

### Evaluation Issues

Consistent with the requirement of the TB *Policy on Evaluation* and associated directive (2009), the evaluation addressed:

1. **Relevance:** To what extent is there a continued need for the sub-programs? To what extent are the sub-programs consistent with federal government and Agency roles, responsibilities and priorities?
2. **Performance:** Did the sub-programs produce their intended outputs and achieve desired results for the designation and conservation of other heritage places? Were the sub-programs efficient and economical in achieving these results?

### Methodology

Data from multiple lines of evidence was collected for the evaluation. These included: document and file review (including analysis of a variety of secondary data in the Agency); interviews with Agency staff; and a comparative analysis of related program elements.

The evaluation focused on the period between 2009-10 and 2013-14. It was conducted concurrently with an Evaluation of the National Historic Sites Designation sub-program. Where relevant, processes and results from this evaluation are referenced in the current report to provide context and comparisons.

### Relevance

Our evaluation found evidence of the relevance of the sub-programs. The programs we evaluated are designed to address threats to the integrity of specific natural and cultural resources. To this end, designation and conservation programs are a common policy instrument used by all levels of government in Canada and internationally. Parks Canada has specific legislative authorities and responsibilities for the implementation of these other heritage places programs. The sub-programs are consistent with the federal government's Whole of Government Framework and Canada has solidified its commitment to some of the programs through national and international agreements. While specific

survey data is lacking, there is anecdotal evidence of Canadians' support for the programs by their participation in the nomination and conservation processes.

### Effectiveness

Our evaluation also found evidence that key designation activities are being planned and delivered consistent with the sub-programs' commitments. The programs have developed systems to identify and, where relevant, to prioritize nominated heritage places for designation. The programs are completing or are supporting the evaluation of nominated places and these evaluations are resulting in places being designated. All of the programs evaluated experienced some level of system growth from 2009-10 to 2013-14. Where relevant, newly designated heritage places are also being appropriately commemorated. While these designations are being communicated to the public, the various communication tools maintained by Parks Canada may not consistently capture all relevant designations.

By undertaking these activities, we found that Parks Canada is on track to meet its designation-related targets. Specifically:

- From 2009-10 to 2012-13, the Federal Heritage Buildings Program met its target to evaluate an average of 400 federal buildings per year. The Agency has since refined its expectations to target 95% of federal buildings submitted for evaluation within six months of receipt. Our analysis shows that meeting this target may be a challenge for the Agency – from 2009-10 to 2014-15, only 70% of buildings submitted were evaluated within this targeted timeframe.
- The Agency is progressing rapidly through its evaluation of heritage lighthouses. In discussion with DFO, PCA is developing a strategy to ensure that the Minister will be able to consider all petitioned lighthouses before the legislated deadline of May 2015.
- Parks Canada has met its target for World Heritage Sites by providing advice and review on the three active nominations.

By contrast, Parks Canada's role in the conservation of other heritage places where it is not the custodian is relatively limited. From 2009-10 to 2013-14, the Agency's only target related to OHP Conservation was that "programs support the conservation of cultural resources at historic places administered by others". We found that the Federal Heritage Buildings Program and Heritage Railway Stations Program are completing required reviews of proposed interventions to designated structures. The PM Grave Sites Program has reviewed the condition of grave sites, identified conservation priorities and made some investments in conservation work.

Further, we found evidence that the Agency provides advice and support tools to responsible jurisdictions, custodians and proponents to help ensure that their nominations and conservation actions are effective. However, it is the owner of the designated place that is responsible to ensure that its heritage character is respected. As Parks Canada is not required to monitor the condition of sites it does not own or administer, there is no information on the overall state of designated Federal Heritage Buildings, Heritage Railway Stations or National Historic Sites. While Parks Canada is meeting its reporting requirements related to World Heritage Sites, requirements for annual reporting on the state of Canadian Heritage Rivers managed by the Agency have not been consistently met.

## Efficiency and Economy

Our ability to conclude on the efficiency and economy of the sub-programs is limited by the quality of available financial data. We found that the OHP sub-programs operate with minimal human resources, and seeks to increase efficiency by sharing resources where feasible. Process times to complete heritage designations or to review proposed interventions depended largely on the program but could range from several months to several years. The length of the process time is heavily impacted by various management constraints.

Specific to Federal Heritage Buildings, we found that while notional timelines to complete evaluations were often exceeded, the average time to complete evaluations decreased over the evaluation period. However, while intended to increase efficiency, the program's tendency to complete the evaluations of multiple buildings in batches negatively skews the data and will make it more difficult for the program to demonstrate progress against its targeted outcomes.

## Recommendations

Sharing the heritage value of designated heritage places is an essential element of effective cultural resource management. The Directory of Federal Heritage Designations is intended to be a complete list of federal designations stemming from various programs. The lack of plaques or other markers to commemorate most sites designated under Other Heritage Places programs makes this an important public record and communication tool. However, we found some existing designations (e.g., heritage lighthouses) were not yet recorded in the Directory. The link between this Directory and other on-line references (e.g., Canadian Register of Historic Places) is also unclear. Given this, we recommend that:

**Recommendation 1:** The VP, Heritage Conservation and Commemoration update the Directory of Federal Heritage Designations to include all relevant federal designations and, using existing on-line references, clarify the role of this Directory in providing information to the public.

**Management Response:** Heritage Conservation and Commemoration Directorate will study the possibility of including all relevant federal designations into the Directory of Federal Heritage Designations. Wherever possible, designations will be added to the Directory and published. In some instances, we may require support from the Office of the Chief Information Officer (CIO) to make modifications to the Directory of Federal Heritage Designations in order to accommodate all federal heritage designations. Work to include the heritage lighthouses is now underway after the database was modified in 2013-15 to allow for their inclusion. All heritage lighthouses will be included in the Directory of Federal Heritage Designations. Target: 2017-18.

We found that Parks Canada has not consistently submitted annual reports for all designated Canadian Heritage Rivers under its administration as required by the program's Principles, Procedures and Operational Guidelines. As the *Parks Canada Agency Act* states that it is in the national interest for Parks Canada to "provide leadership and support to the Canadian Heritage Rivers System", we would expect the Agency to lead by example in this initiative. Given this, we recommend that:

**Recommendation 2:** The VP Heritage Conservation and Commemoration should work with relevant Field Units to ensure that annual reports are consistently produced as required for Canadian Heritage Rivers under Parks Canada's administration.

**Management Response:** Partially agree. Heritage Conservation and Commemoration Directorate will work with the Canadian Heritage Rivers Board to review monitoring and reporting requirements agreed to in the Canadian Heritage Rivers System Principles, Procedures and Operational Guidelines. Target: 2015-16.

Overall, our analysis of the efficiency of the Other Heritage Places sub-programs was limited by the availability or quality of databases used to track the processing of relevant files. In particular, the Federal Heritage Buildings Program provided the evaluation with six different data files used to track evaluations, none of which were subject to any quality controls. We found that the data contained several errors and inconsistencies (e.g., missing data or incorrect dates). The relative size of this program (i.e., managing hundreds of files) makes it critically important that an adequate tracking system be in place. Given this, we recommend that:

**Recommendation 3:** The VP Heritage Conservation and Commemoration should review and implement mechanisms to enhance the integrity of data recorded in Federal Heritage Buildings Program databases. At minimum, to better track process times on files, databases should capture information relevant to each step in the program's evaluation and review process.

**Management Response:** Heritage Conservation and Commemoration Directorate will work with Registries staff to define and implement data integrity protocols to ensure that there are checks and balances in place for consistent and accurate data in the Federal Heritage Buildings Review Office (FHBRO) databases. These protocols will be communicated to all users and implemented with the use of tools such as guidelines and maintenance schedules. Target: 2016-17.

Further, we found that the Federal Heritage Buildings Program has not maximized the use of tools designed to increase the efficiency of the evaluation process. From 2009-10 to 2013-14, no screening or benchmark evaluations resulted in a building being designated as heritage, suggesting that there may be limited value-added by these levels of evaluation. Given this, we recommend that:

**Recommendation 4:** To increase efficiency, the VP Heritage Conservation and Commemoration should review and rationalize the need for and level of effort required to complete screening and benchmark evaluations of buildings nominated under the Federal Heritage Buildings Program. An assessment of the risks and benefits related to possible alternatives to or variations within the evaluation process (including more consistent and/or extensive use of exemptions) should be documented.

**Management Response:** The Federal Heritage Buildings Review Office (FHBRO) will review and analyze its processes to evaluate buildings using a risk management approach. Target: 2015-16.

Recommendations to improve and/or streamline processes will be formulated with a view to identifying those that could be exempted from the formal review process and gradually implemented. Target: 2016-17.



## 1. INTRODUCTION

Parks Canada's mandate is to:

“Protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for present and future generations.”

PCA carries out its mandate through five programs and nineteen sub-programs (See Appendix A for the Program Alignment Architecture, PAA).

This evaluation focuses on the **Other Heritage Places (OHP) Designations** and **Other Heritage Places Conservation** sub-programs of the PAA. Collectively, the two sub-programs do not represent a significant expenditure by the Agency (0.6% of the Agency's total annual expenditures in 2013-2014). They were 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 Other Heritage Place Designations and Conservation sub-programs have not been subject to previous comprehensive evaluation work in the Agency.

This evaluation was conducted concurrently with an evaluation of the National Historic Sites (NHS) Designation sub-program. Where relevant, processes and results from this evaluation are referenced in the current report to provide context and comparisons.

## 2. DESCRIPTION OF OTHER HERITAGE PLACES SUB-PROGRAM

The Agency is responsible for three major heritage systems:

- 44 National Parks (NP) of Canada;
- 167 National Historic Sites (NHS) of Canada (administered by the Agency); and
- 4 National Marine Conservation Areas (NMCA) of Canada.

In addition, Parks Canada is responsible for a number of other heritage protection programs.<sup>1</sup> These programs support and enhance the protection of a range of important cultural and natural heritage resources. For the purposes of this evaluation, we focused on six programs within the other heritage places envelope:<sup>2</sup>

1. **Federal Heritage Buildings (FHB)** program which aims to evaluate the heritage character of federal buildings that are 40 years of age or older, provide advice before actions that could affect the heritage character of a classified building are undertaken and before federal heritage buildings are demolished, dismantled or sold.<sup>3</sup>

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<sup>1</sup> These are not formal programs as defined by the PAA. However, for simplicity, we use the term “program” to refer to each of these activities throughout this report.

<sup>2</sup> The Other Heritage Places sub-programs also include international activities supporting Canada's efforts related to the preparation and implementation of various international agreements. These activities were not covered by the current evaluation.

<sup>3</sup> FHB Program defines a “building” as a structure that: is capable of containing or sheltering human activities; has an interior space, and exterior shell and a roof; and is fixed in a permanent specific location. Buildings administered by Crown corporations (e.g. Canada Post Corporation), archaeological resources or ruins are excluded.

2. **Heritage Railway Stations** program which aims to identify and protect railway stations owned by railway companies governed by Part III of the *Canada Transportation Act* that are 40 years or older.
3. **Heritage Lighthouses** program which aims to identify, protect and conserve federally-owned heritage lighthouses.
4. **National Program for the Grave Sites of Canadian Prime Ministers** which aims to ensure that the grave sites of deceased Prime Ministers are conserved and recognized in a respectful manner.
5. **Canadian Heritage Rivers System (CHRS)** program which aims to identify, recognize and ensure long-term management of rivers in Canada with outstanding natural, cultural and recreational heritage values for the benefit and enjoyment of Canadians.
6. **World Heritage Sites (WHS)** program, an international initiative which aims to identify, protect, conserve, present and transmit to future generations cultural and natural heritage of outstanding universal value.<sup>4</sup>

Specific responsibilities for each of these programs are assigned to the Agency. Parks Canada works with other federal government departments, other levels of government, and a wide range of national and international partners to increase the number of these designations in Canada and ensure that designated heritage places are conserved. While Parks Canada owns and/or administers some of the natural or cultural heritage places designated under several of these programs,<sup>5</sup> its role in these programs is largely administrative or secretarial. Additional details on the Agency's specific roles and responsibilities are outlined below.

## 2.1 EXPECTED RESULTS AND TARGETS

The evolution of Parks Canada's expected results and targets for the Other Heritage Places sub-programs as identified in its Performance Management Framework (PMF) is shown in Table 1.

**Table 1. Corporate Performance Expectations for Other Heritage Places Sub-Activities, 2009-10 to 2015-16**

Year	Other Heritage Places Designations		Other Heritage Places Conservation	
	Expected Result	Indicator Target	Expected Result	Indicator Target
2009-10	Federal leadership is ensured in the identification and commemoration of other heritage places not administered by Parks Canada.	On average over 3 years, evaluate 400 federal buildings per year to identify buildings that have an historic value.	Federal leadership is ensured in the protection of cultural resources not administered by Parks Canada.	The % of targeted national historic sites that consider that Parks Canada supports them in the protection of the historic value of their site is improved by 10% by March 2011.
2010-11				The % of targeted national historic sites that consider that Parks Canada supports them in the protection of the historic value of their site is improved by 10% by March 2012.
2011-12				The % of targeted national historic sites that consider that Parks Canada supports them in the protection of the historic value of their site is improved by 10% by March 2012.

<sup>4</sup> "Outstanding Universal Value" means cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity.

<sup>5</sup> See list in Appendix B.

2012-13	Heritage places not administered by Parks Canada are identified.		Parks Canada programs support the conservation of cultural resources at historic places administered by others most in need.	100 % of Parks Canada's advice promotes the conservation of significant cultural resources at historic places administered by others and is targeted to areas in need.
2013-14				
2014-15	Other heritage places not administered by Parks Canada are considered for designation.	<p>Complete 95% of evaluations for federal buildings submitted to Parks Canada by March 2015.</p> <p>Review 100% of the lighthouses nominated for Heritage Lighthouse designation by May 2015.</p> <p>Provide advice and review of 3 nominations for Canadian World Heritage Sites by March 2015.</p>	Parks Canada programs support the conservation of cultural resources at historic places administered by others.	100% of cost-sharing agreements completed contribute to the conservation of significant cultural resources by March 2015.
2015-16	Other heritage places are considered for national or international designation.	<p>Percentage of federal heritage buildings submitted for evaluation that have been reviewed within six months of receipt. Target: 95% (annually).</p> <p>Percentage of lighthouses nominated for Heritage Lighthouse designation that have been reviewed. Target: 100% by May 2015.</p> <p>Number of candidate nominations for Canadian WHS where Parks Canada has provided advice and review. Target: 3 (annually).</p>	Parks Canada programs support the conservation of places administered by others.	<p>Number of national historic sites where threats have been mitigated or reduced through cost-sharing agreements. Target: 30 by march 2018.</p> <p>Percentage of reviews of interventions on federal heritage buildings completed within required timeframe. Target: 100% (annually).</p> <p>Percentage of responses to the World Heritage Centre for State of Conservation reports concerning Canadian WHS within the required timeframe. Target: 100% (annually).</p>

From 2009-10 to 2013-14, **designation targets** focused exclusively on outputs of the Federal Heritage Building program (i.e., the average number of evaluations of buildings over three years). In 2014-2015, the wording of the target for the FHB program changed and targets related to the activities and outputs

for the Heritage Lighthouse program and the World Heritage Sites program were added. The target for FHBs was revised in 2015-2016 to make it more measurable.

From 2009-10 to 2011-12, **targets for conservation** focused either implicitly or explicitly on provision of advice and financial support to owners of National Historic Sites not administered by the federal government. In 2012-13 to 2013-14, the target was broadened to focus on advice to a variety of historic places administered by others but narrowed again in 2014-15 to focus on financial assistance provided through the National Historic Sites of Canada Cost-Sharing Contribution program.<sup>6</sup> This contribution program has been the subject of a recent evaluation (*Evaluation of Parks Canada's National Historic Sites Cost-Sharing Program*, November 2012) and is not included within the scope of the current evaluation. For 2015-16, additional targets were added for FHBRO and WHS.<sup>7</sup>

Parks Canada has also agreed to joint objectives and targets for natural resources by being a signatory to agreements. For example, as a party to the Canadian Heritage Rivers System program, the Agency is committed to advancing the CHRS Strategic Plan 2008-2018, including its objective to establish a comprehensive system of Canadian Heritage Rivers by 2018. Responsibility for achieving this objective is shared with provincial and territorial governments.

## 2.2 ACTIVITIES AND OUTPUTS

The following table describes the activities related to the designation and conservation processes for the Other Heritage Places sub-programs, and identifies the specific programs to which they apply.

**Table 2. Description of Designation and Conservation Processes**

Designation		
Process	Description	Applicable Programs
Nomination	Processes to identify which out of many eligible places should be considered for designation. All programs have established criteria for determining what is significant. For FHB and Heritage Railway Stations, federally-owned buildings 40+ years are automatically subject to evaluation. Other programs rely on nominations (mostly from the public) and/or system plans.	<ul style="list-style-type: none"> <li>• FHB</li> <li>• Heritage Railway Stations</li> <li>• Heritage Lighthouses</li> <li>• CHR</li> <li>• WHS</li> </ul>
Evaluation and Designation	Processes to evaluate, recommend and approve which nominated places should be designated and, where relevant, to determine the level of designation. All programs have established evaluation criteria against which places are assessed.	<ul style="list-style-type: none"> <li>• FHB</li> <li>• Heritage Railway Stations</li> <li>• Heritage Lighthouses</li> <li>• CHR</li> <li>• WHS</li> </ul>
Identification of Heritage Value	Development of a Statement of Significance (SOS), i.e., a declaration of value that briefly explains what a historic place is and why it is important, and that identifies key aspects of the place that must be protected.	<ul style="list-style-type: none"> <li>• FHB<sup>8</sup></li> <li>• Heritage Railway Stations</li> <li>• Heritage Lighthouses</li> </ul>

<sup>6</sup> Until 2014-15, the National Historic Sites Cost-Sharing Program was identified as a sub-sub-program in the Agency's PAA.

<sup>7</sup> The implementation of these targets is outside the temporal scope of the evaluation. However, this report includes an assessment of the likelihood that the targets will be met based on the Agency's recent performance in these areas.

<sup>8</sup> Within the FHB Program, SOS are referred to as Heritage Character Statement (HCS).

Marking	Processes associated with creating and placing a sign, plaque or other marker at a site and in some cases a short text explaining its importance or significance.	<ul style="list-style-type: none"> <li>• PM Grave Sites</li> <li>• CHR</li> <li>• WHS</li> </ul>
Commemoration	Processes associated with holding a ceremony to support the formal announcement of a designation.	<ul style="list-style-type: none"> <li>• PM Grave Sites</li> <li>• CHR</li> <li>• WHS</li> </ul>
<b>Conservation</b>		
<b>Process</b>	<b>Description</b>	<b>Applicable Programs</b>
Conservation Planning	Documenting baseline conditions which in turn act as a guide for current and future interventions. These may be part of or in addition to the overall management plan for a site. Development of conservation plans is often a condition for designation.	<ul style="list-style-type: none"> <li>• FHB</li> <li>• Heritage Lighthouses<sup>9</sup></li> <li>• Heritage Railway Stations<sup>10</sup></li> <li>• PM Grave Sites</li> <li>• CHR</li> <li>• WHS</li> </ul>
Review of Interventions (ROI)	Some programs require owners to submit proposals for individual interventions (i.e., alterations, transfers, sales or disposals) of a designated place for review and/or approval.	<ul style="list-style-type: none"> <li>• FHB</li> <li>• Heritage Railway stations</li> </ul>
Monitoring and Reporting	Monitoring of and regular and/or reactive reporting on the state of designated places, threats to their conservation and how these are being managed.	<ul style="list-style-type: none"> <li>• PM Grave Sites</li> <li>• CHR</li> <li>• WHS</li> </ul>

With the exception of PM Grave Sites, each of the programs has a designation component wherein the heritage value of places is identified and evaluated. However, many of the programs lack a commemoration component. This differentiates them from the NHS Designation sub-program which has a process to both designate and commemorate heritage places.

All of the programs also create some form of document (i.e., Statement of Significance or conservation plan) that serves as a baseline condition and guide for current and future interventions. Only the FHB and Heritage Railway Stations program require owners to submit proposals for the review of individual interventions. Owners of Heritage Railway Stations are also required to provide public notice of proposed interventions to allow for input from citizens and other concerned groups. Although owners of designated lighthouses are not required to seek a review of interventions they are required to post public notice of intentions to intervene.

For the National Program of Prime Ministers Grave Sites, there is no nomination process since the grave sites have inherent historic value worthy of commemoration and conservation. The process of commemoration for these sites involves holding a ceremony, and installing a Canadian flag and an informative plaque on the life and accomplishments of the Prime Minister resting in the grave. The decision on whether or not to hold a ceremony is contingent on the consent of surviving family members or descendants of the relevant Prime Minister. PM Grave Sites is also the only OHP program

<sup>9</sup> Designation of Heritage Lighthouses is contingent on the owner agreeing to respect the heritage value of the site. For surplus lighthouses acquired by third parties, commitments to heritage protection are set in business plans and divestiture agreements negotiated with DFO (the federal owner of surplus lighthouses); designation carries an obligation to respect the heritage character of the heritage lighthouse, as articulated in its SOS.

<sup>10</sup> Done on an ad hoc basis.

where the federal government assumes obligations for the maintenance/repair of sites it does not directly own.

Our ability to comment on long-term conservation outcomes (i.e., whether or not the programs actually result in the continued or enhanced conservation of the heritage value of designated sites) is limited by Parks Canada's role in these programs. Except where the Agency is the owner/administrator of a site, it does not monitor compliance and thus has limited data on the extent to which its advice with regards to conservation actions is actually followed.

## **2.3 RESOURCES (INPUTS)**

### **2.3.1. Budget and Expenditures**

The Other Heritage Places Designations and Conservation sub-programs are funded through general appropriations. Tracking of relevant expenditures within the Agency is usually at the level of PAA Other Heritage Places sub-programs as a whole rather than at the level of six individual 'programs' which are the focus of the evaluation. Recorded expenditures for both Other Heritage Places Designation and Conservation at this level ranged from \$3.2M to \$5.8M per year over the five year period from 2009-2010 to 2013-2014. On average, close to 70% of annual expenditures are for OHP Conservation; the remainder are for OHP Designation.

Additional analysis on program expenditures is presented in the section on efficiency and economy.

### **2.3.2. Human Resources**

The Agency only began reporting on planned and actual FTEs for these sub-programs in 2012-13. Data for this one year shows 4 FTEs dedicated to OHP Designations and 22 FTEs for OHP Conservation.<sup>11</sup> The RPP for 2015-16 shows that planned FTEs are expected to remain relatively stable over the next three years (i.e., 3 FTE for OHP Designation and 19 FTE for OHP Conservation from 2015-16 to 2017-18). This is the total number of FTEs for the sub-programs, including but not limited to the six programs included in the scope of the evaluation. Based on program data, we estimate approximately 10 FTEs currently dedicated to these six programs.

Details on the allocation of staff are presented in the section on efficiency and economy.

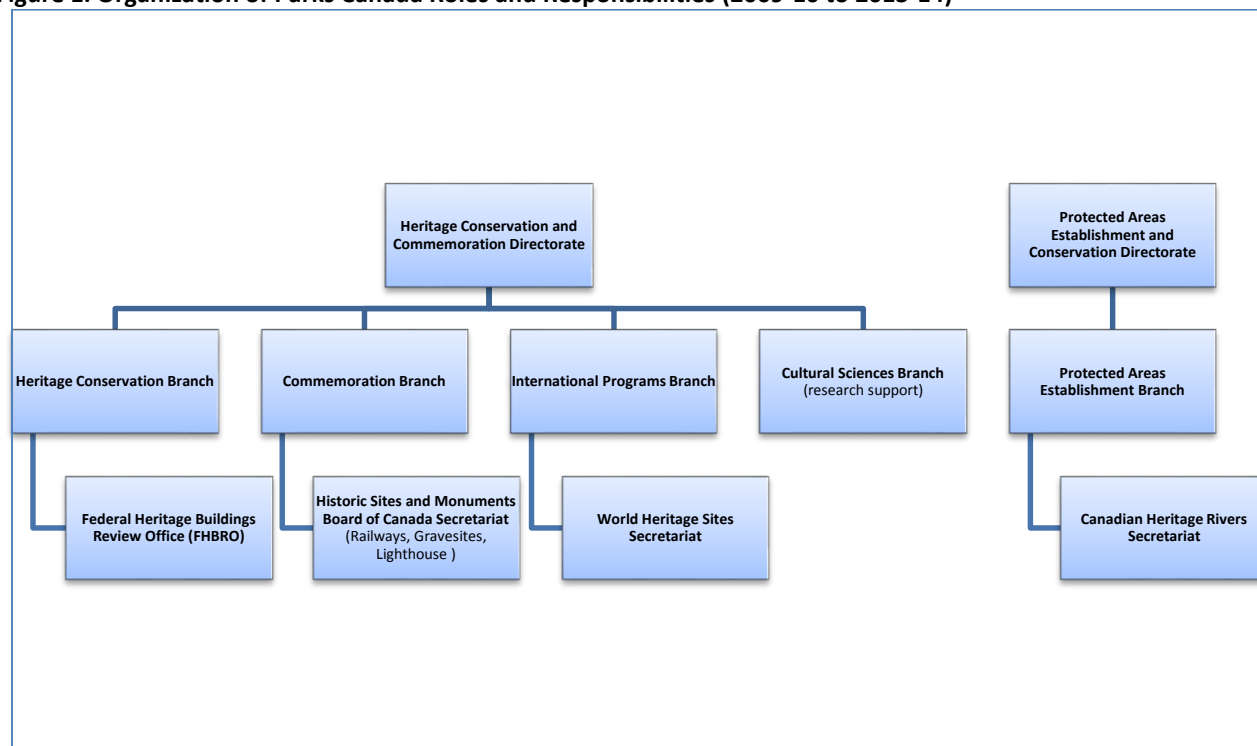
## **2.4 ROLES AND RESPONSIBILITIES**

Parks Canada's role in the Other Heritage Places Designation and Conservation sub-programs is primarily program administration. During the period under evaluation (2009-10 to 2013-14), responsibility for the Other Heritage Places sub-programs was assigned to several branches within the Heritage Conservation and Commemoration Directorate. The Canadian Heritage Rivers Program was managed by the Protected Areas Establishment and Conservation Directorate. The following chart presents this organization structure, including each branch's specific responsibilities. Note that the chart shows a simplified organization of the program; OHP programs were only a portion of the duties of each Branch. Field units also have roles and responsibilities that vary with the specific program.

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<sup>11</sup> Total excludes students; includes an allocation to internal services.

Figure 1. Organization of Parks Canada Roles and Responsibilities (2009-10 to 2013-14)



In April 2015, the Heritage Conservation and Commemoration Directorate was significantly reorganized. The new Heritage Designations and Programs Branch is now responsible for almost all heritage designation activities and related programs within the Parks Canada portfolio, including international programs and Canadian Heritage Rivers. The exception is the Federal Heritage Buildings Review Office, which is now part of the Cultural Heritage Policies Branch. With exception of Canadian Heritage Rivers, historians within the Archaeology and History Branch (former Cultural Sciences Branch) continue to provide research support to all of the OHP programs.

Each of the programs also involves a variety of stakeholders in the designation and conservation of heritage places. While they may implicate other stakeholders, four of the programs in the OHP envelope are designed and **administered by the federal government** – Federal Heritage Buildings, Heritage Lighthouses, Heritage Railway Stations and PM Grave Sites. Table 3 provides a summary of the key roles and responsibilities for designation processes in these federal government programs.

**Table 3. Roles and Responsibilities in Designation Process, Federal Government Programs**

Program	Targeted Heritage Place	Nominations	Evaluations	Recommendations for Designation	Listing on Heritage Registries <sup>12</sup>	Marking and Commemoration
<b>Federal Heritage Buildings</b>	Owned by the federal government	By federal custodians	By Parks Canada	By Parks Canada or Federal Heritage Buildings Committee <sup>13</sup>	By Parks Canada	None
<b>Heritage Lighthouses</b>		By the public (petitions)		By the Historic Sites and Monuments Board of Canada (HSMBC) <sup>14</sup>		By Parks Canada and owner <sup>15</sup>
<b>Heritage Railway Stations</b>	Owned by railway companies	Based on PCA inventory <sup>16</sup>		None		None
<b>PM Grave Sites</b>	Managed by family/cemetery	None	None	None	None	By Parks Canada

For Federal Heritage Buildings, Heritage Lighthouses and Heritage Railway Stations, recommendations for designation are approved by the Minister of the Environment. The designation process for these three programs is thus very similar to that for NHS, where Parks Canada determines the eligibility of and conducts historical research for nominations but the HSMBC evaluates and recommends and the Minister approves designations.

While conservation processes also differ between these federal programs, Parks Canada's role in these processes is relatively limited. The Agency's main conservation roles under OHP programs are the provision of conservation advice to owners of heritage places and the review of proposed interventions to Federal Heritage Buildings and Heritage Railways Stations. Owners of these structures (i.e., federal custodians or railway companies) must bring forward proposals for interventions and these are evaluated by Parks Canada against the structure's specific Statement of Significance. For Federal Heritage Buildings, the Agency provides advice and guidance on whether and how the intervention respects the *Standards and Guidelines for the Conservation of Historic Places in Canada*.<sup>17</sup> For sales or transfers, the Agency "certifies" that custodians have made "best efforts" to ensure the continued protection of the building or, if the building is to be destroyed, that its heritage character is adequately documented. No ministerial approval is required for FHB. For railway stations, Parks Canada evaluates railway companies' proposals to alter, demolish, transfer or sell a designated station and makes a recommendation to the Minister who (if in agreement) asks the Governor in Council to grant an Order in Council authorizing the intervention.<sup>18</sup>

<sup>12</sup> See Appendix C for description of heritage registries.

<sup>13</sup> Committee membership varies depending on the building to be considered for designation; at minimum, it consists of representatives from Parks Canada and from the responsible custodian department.

<sup>14</sup> The Board is established under the *Historic Sites and Monuments Act* with the specific purpose of advising the Minister of the Environment on heritage designations.

<sup>15</sup> Plaques will be available to any heritage lighthouse owner that consents to having a plaque installed on their property. Parks Canada will pay for the manufacture and shipping of plaques, while the owners will be responsible for their installation.

<sup>16</sup> PCA created a master list of existing railways in 1991; this list has not been updated to reflect new construction since program inception.

<sup>17</sup> *Standards and Guidelines*, 2010. <http://www.historicplaces.ca/media/18072/81468-parks-s+g-eng-web2.pdf>

<sup>18</sup> In very rare cases, the HSMBC may evaluate the proposal and make a recommendation to the Minister.



Again, the PM Grave Sites Program is different. A comprehensive conservation plan for the grave site is agreed to between the family, the cemetery and Parks Canada. The plan documents the important features of the grave and surrounding area, and sets out roles and responsibilities for routine maintenance, repairs, and long-term upkeep. While the cemetery remains responsible for regular upkeep, Parks Canada field units are assigned responsibility for various maintenance and repairs for particular grave sites. Every five years, Parks Canada reviews the condition of each grave site and produces a site monitoring report. The report identifies work required at each site and sets out a five-year schedule of maintenance and repairs to be carried out by personnel in the relevant field units.

The other two programs – Canadian Heritage Rivers and World Heritage Sites – involve **shared administration**. The Canadian Heritage Rivers System program is a cooperative federal-provincial-territorial initiative.<sup>19</sup> It is administered by the Canadian Heritage Rivers Board, made up of members appointed by governments in all participating jurisdictions.<sup>20</sup> Parks Canada acts as the Canadian Heritage Rivers Board Secretariat which: coordinates meetings; provides financial and technical support for the preparation of studies and documents required for nominations, designation and monitoring of Canadian Heritage Rivers; and develops related communications and promotional products.

The World Heritage Sites program is based on the World Heritage Convention, an international agreement under the United Nations Educational, Scientific and Cultural Organization (UNESCO) that designates a wide array of both natural and cultural heritage. Canada became a party to the convention in 1976, at which time Parks Canada was designated as the lead organization for its implementation. Parks Canada's roles in the WHS program include: coordinating the development of the Tentative List; coordinating and leading all of Canada's communications with the World Heritage Centre; reviewing each nomination and ensuring quality control; providing strategic direction on the preparation of the nomination, facilitating the on-site evaluation and potential subsequent request for additional information; preparing, with other levels of government as appropriate, communications strategies and materials related to the World Heritage Committee's decision; and formally submitting a nomination dossier on behalf of Canada.

The designation process followed by both shared programs is relatively complex. The following table provides a simplified overview of the players for each key step. Other than for provision of financial or technical support and review of nominations for quality control, Parks Canada has a very limited role.

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<sup>19</sup> The Government of Quebec withdrew from the program in 2006 when it established its own river designation program. All other provincial/territorial governments are participants.

<sup>20</sup> Federal participants include representatives of Parks Canada and a representative from Aboriginal Affairs and Northern Development Canada (AANDC).

**Table 4. Roles and Responsibilities in Designation Process, Shared Programs**

Program	Nomination	Evaluation of Nomination	Review of Nomination	Approval of Nomination	Approval of Designation	Marking and Commemoration
<b>Canadian Heritage Rivers</b>	By local citizen/ community groups	Proponent for nominated site conducts research and prepares nomination documents	CHRS Board reviews nomination and recommends approvals <sup>21</sup>	By Minister(s) in responsible jurisdiction(s)	By Minister of the Environment	By proponent and/or responsible jurisdiction(s)
<b>World Heritage Sites</b>	By State Party (Tentative List) <sup>22</sup>		By WHS Secretariat (Parks Canada)	UNESCO World Heritage Committee	UNESCO World Heritage Committee <sup>23</sup>	

Conservation of a Canadian Heritage River or World Heritage Site is the responsibility of the government(s)/custodian(s) in whose jurisdiction the designated place is located. There are also processes for periodic reporting on the state of designated rivers through annual reports compiled by Parks Canada and in-depth monitoring reports completed every 10 years for each designated river by the respective responsible authority. Parks Canada also coordinates the periodic report to the World Heritage Committee describing how Canada is implementing the Convention (i.e., an overview of Canada's legislation, policies and programs for protecting and presenting natural and cultural heritage, and a series of reports on the current conditions of the existing World Heritage Sites in Canada). The Canadian report also forms part of a joint sub-regional report with the United States on North American implementation.<sup>24</sup>

## 2.5 STAKEHOLDERS AND PARTNERS

The reach of the sub-programs varies by program within the Other Heritages Places envelope and by process (designation or conservation). In principle, the heritage places are being designated and conserved for the benefit of all Canadians. The public plays an immediate role in the nomination of designated places under the Heritage Lighthouses and Canadian Heritage Rivers programs. For the Federal Heritage Buildings and Heritage Lighthouses programs, the reach is primarily other federal departments as owners and custodians. Similarly, the Heritage Railway Stations program implicates relevant railway companies as the owners of eligible or designated stations. Groups or individuals looking to acquire these heritage structures will also have an interest, particularly in the timetable for designation and any heritage conservation expectations that are established. Lastly, the Canadian Heritage Rivers program is a cooperative federal-provincial-territorial program. Some proposed and designated World Heritage Sites are also in provincial and/or municipal jurisdiction.

<sup>21</sup> When nomination is approved, proponent then prepares a management plan for the nominated river to be reviewed and approved by the relevant provincial/territorial Minister and CHRS Board, after which the Board will recommend the river to be designated by the Minister of the Environment.

<sup>22</sup> Tentative List is an inventory of properties considered to have outstanding universal value and which the State Party intends to nominate during the following years. Canada last updated its list in 2004.

<sup>23</sup> The decision by the World Heritage Committee is based upon technical reports prepared by other UN Committees (i.e., ICOMOS or IUCN).

<sup>24</sup> Canada and the United States are part of the 'European and North America' Region within UNESCO.

## 2.6 OHP DESIGNATIONS AND CONSERVATION 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 the following table. The logic model provides a visual summary of the program description.

**Table 5. Logic Model for Other Heritage Places Designation and Conservation Sub-Programs**

<b>Strategic Outcome:</b> 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.		
<b>Inputs</b>	<ul style="list-style-type: none"> <li>Financial Resources (average of \$4.2M per year from 2009-10 to 2013-14)</li> <li>Human Resources (PCA)</li> </ul>	
<b>PCA Activities</b>	<ul style="list-style-type: none"> <li>Secretarial support to CHRS and HSMBC</li> <li>Administration of FHBRO</li> <li>Federal-provincial-territorial and international leadership/liaison</li> </ul>	
	Designation – Where applicable: <ul style="list-style-type: none"> <li>Identification of eligible places</li> <li>Evaluation of nominated places</li> <li>Identification of heritage value</li> <li>Marking and/or commemoration</li> <li>Communication of designations</li> <li>Support to responsible jurisdictions, custodians and/or proponents</li> </ul>	Conservation – Where applicable: <ul style="list-style-type: none"> <li>Conservation planning</li> <li>Review of interventions</li> <li>Monitoring and reporting</li> <li>Maintenance and repair of grave sites</li> <li>Support to responsible jurisdictions, custodians and/or project proponents</li> </ul>
<b>PCA Outputs</b>	Designation – Where applicable: <ul style="list-style-type: none"> <li>Systems plans and/or list of eligible sites</li> <li>Evaluations of nominated places</li> <li>Advice and review of nominations</li> <li>Statements of Significance</li> <li>Directories of designated places</li> <li>Communication and commemoration products (e.g., announcements, ceremonies, plaques, flags, etc.)</li> <li>Guidance, tools and funding to support proponents of nominations</li> </ul>	Conservation – Where applicable: <ul style="list-style-type: none"> <li>Reviews of proposed alterations, transfers, sales and disposals</li> <li>Conservation/maintenance plans</li> <li>Monitoring reports</li> <li>Guidance on conservation and maintenance for responsible jurisdictions, custodians and/or project proponents</li> </ul>
<b>Reach</b>	<ul style="list-style-type: none"> <li>Canadians, particularly those who participate in the nomination process</li> <li>Custodians of nominated and designated places, including other federal departments and railway companies</li> <li>Provincial, territorial and international governments</li> <li>Stakeholders interested in acquisition of designated heritage structures</li> </ul>	
<b>Immediate Outcome</b>	<ul style="list-style-type: none"> <li>Other heritage places of cultural and/or natural significance are identified, designated and communicated to Canadians.</li> </ul>	<ul style="list-style-type: none"> <li>Owners or custodians of other heritage places receive the advice/guidance required to conserve the heritage character of the resource.</li> <li>Grave Sites of Canadian Prime Ministers are maintained.</li> </ul>
<b>Long-Term Outcome</b>	Other Heritage Places programs support and enhance the protection of a range of important cultural and natural heritage resources.	

### 3. EVALUATION DESIGN

#### 3.1 EVALUATION PURPOSE AND SCOPE

The evaluation examined the relevance and performance (i.e., effectiveness, efficiency, and economy), of the Other Heritage Places Designation and Other Heritage Places Conservation sub-programs, consistent with the requirements of the TB Evaluation Policy and the related directive (2009). This evaluation generally covers the period from 2009-10 to 2013-2014. More recent data on the Heritage Lighthouse program (to October 2014) is included to reflect the rate of progress being made in reviewing these designations. Parks Canada Agency evaluation staff conducted the evaluation's field work between September 2013 and September 2014.

The scope of the evaluation includes Parks Canada's research and administrative role in the delivery of six programs described as Other Heritage Places – i.e., Federal Heritage Buildings, Heritage Railway Stations, Heritage Lighthouses, National Program for Grave Sites of Canadian Prime Ministers, Canadian Heritage Rivers System, and World Heritage Sites. While Parks Canada owns and/or administers some of the natural or cultural heritage places designated under several of these programs, activities the Agency undertakes to produce specific conservation outcomes in these areas are related to its broader national park or national historic sites conservation programs and thus are outside the scope of this evaluation.<sup>25</sup> The exception is the Prime Ministers' Grave Sites program, as these sites are generally not contained within a larger heritage place and therefore require conservation actions specific to the Other Heritage Places Conservation sub-program.

#### 3.2 APPROACH, METHODOLOGY AND LIMITATIONS

The evaluation addressed six specific questions and 11 associated expectations related to issues of relevance and performance. The key questions are shown in Table 6. A more detailed matrix of evaluation questions, what we expected to observe, indicators and relevant data sources is found in Appendix D.

**Table 6. Evaluation Issues and Questions**

<b>Relevance</b>
To what extent is there a continued need for the sub-programs?
To what extent are the sub-programs aligned with government priorities?
To what extent are the sub-programs aligned with federal roles and responsibilities?
<b>Performance</b>
To what extent are activities taking place and expected outputs being produced?
To what extent is there progress towards expected outcomes for OHP Designations and Conservation?
To what extent are the sub-programs efficient and economical?

<sup>25</sup> For example, Wood Buffalo National Park is a designated World Heritage Site. All specific conservation actions, including management planning, are undertaken under the Agency's National Parks Conservation sub-program.

### 3.2.1. Methods

The evaluation employed multiple methods of data collection.

**Document and File Review:** A wide range of publicly available documents was reviewed for the evaluation, including legislation, policies, plans, reports and published literature (see Appendix E). Agency files and databases (e.g., financial data) were also reviewed.

**Key Informant Interviews:** Key informant interviews were conducted with 9 PCA staff and senior managers at National Office. The interviews were conducted in person with follow up being done in person or via email.

**Comparative Analysis:** Where relevant, our analysis includes a comparison of the relevance and performance of designation and conservation processes among the six programs included in the OHP envelope. In addition, given cross-linkages among the programs, this evaluation was undertaken in parallel with an Evaluation of the National Historic Site Designations sub-program. Where relevant, our analysis also includes comparisons of the designation process for the OHP and NHS programs. Lastly, we conducted a limited review of similar international programs to determine whether there were any best practices that could be applied to PCA.

### 3.2.2. Strengths, Limitations and Mitigation Strategies

Through the document and file review, we gained an extensive understanding of other heritage places designation and conservation processes. However, various limitations with respect to data in relevant Agency information systems were identified. This includes issues with how relevant expenditure data is captured and coded in the financial system and issues with program specific databases. For example, we were provided with six different data files used to track Federal Heritage Building evaluations, none of which were subject to any quality controls. We found that the data contained several errors and inconsistencies (e.g., missing data or incorrect dates). For other programs, there is no database available to track progress of files or their processing times. Where possible, we constructed our own data set based on the best available information to generate information on program performance. However, it was beyond the scope of the evaluation to fully compensate for the limitations of secondary data. The limitations and their implications for drawing conclusions about evaluation questions are discussed where relevant in the report.

Our interviews with Parks Canada staff were sufficiently extensive and can be considered representative of current opinion and perceptions within National Office. No client interviews were conducted as part of the evaluation. This limitation was mitigated by a review of stakeholder perspectives as presented in available documentation (e.g., media reports, Senate Committee hearings, and communications from interested heritage groups). One member of the evaluation team also attended the Canadian Heritage Rivers Conference (2013) to better understand program delivery from the perspective of stakeholders.

## 4. EVALUATION FINDINGS

### 4.1 RELEVANCE

Question 1	Indicators
To what extent is there a continued need for the sub-programs?	<ul style="list-style-type: none"> <li>• Gap filled by program (i.e., program rationale)</li> <li>• Canadians' support for heritage conservation</li> <li>• Nominations for designations submitted by the public</li> </ul>

**Expectation:** There is a need to designate and conserve natural and cultural heritage resources outside the Agency's major systems.

The four federal government focused programs we evaluated in the OHP envelope were each designed to address either direct or perceived threats to the integrity of specific cultural resources. For example, while lighthouses and railways stations are considered to be monuments to Canada's maritime and transportation history, changes in

technology have reduced the need for the operation of these structures. As a result, minimal maintenance was being conducted and the structures were deteriorating or being demolished. Stations owned by railway companies and federally-owned lighthouses were also seen to lack adequate protections as they are not eligible for provincial and municipal heritage designation. The *Heritage Railway Stations Protection Act* (1990) and *Heritage Lighthouses Protection Act* (2008) filled this gap by creating legal requirements for the conservation of these structures. While not legislated, the programs for Federal Heritage Buildings and Prime Ministers' Grave Sites also originate from public concerns over the deteriorating condition and inadequate protection of some of these historically important resources.

Rather than a response to the condition of specific sites, the programs for World Heritage Sites and the Canadian Heritage Rivers System were born from a shared national or international commitment to the conservation of important natural and cultural resources. In 2013, federal, provincial and territorial governments recognized the ongoing importance of the CHRS by renewing the program's Charter.

Designation and conservation programs are a common policy instrument used by provincial and municipal governments in Canada and internationally. As a result, the same place or parts of a place can be subject to multiple designations. For example, some designated railway stations and close to 38% of petitioned heritage lighthouses are recognized FHBRO buildings. Nearly all designated World Heritage Sites and sections of many Canadian Heritage Rivers are already part of established heritage places (e.g., national or provincial parks). At least one site under each OHP program has also been designated a National Historic Site. This overlapping pattern of designations was also observed in our evaluation of the NHS Designation sub-activity where it was noted that the same building can have municipal, provincial and federal heritage designations.

However, the fact that the same place or parts of a place can be subject to multiple designations is not necessarily an indication of duplication as the various designation programs have different criteria for determining what is of heritage value. For this reason, sites or places designated under one program may not be designated under another (e.g., close to 18% of designated lighthouses were previously evaluated under FHBRO and found to be "not heritage"). Differing designations will also lead to different conservation and protection regimes.

**Expectation:** Canadians support the conservation of Canada’s cultural and natural resources. Where relevant, Canadians are engaged in the process for OHP designations.

Survey research has shown that the majority (86%) of Canadians have an interest in Canada’s past (see *Canadians and Their Pasts*, 2013). Canada’s historic places are considered to be a living legacy for all Canadians. 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 helps ensure that they are available for both current and future generations.

Evidence of Canadians’ support for the designation and conservation of other heritage places includes:

- 546 public petitions to nominate 348 lighthouses, with a total of more than 19,000 signatures;<sup>26</sup>
- Public interest in proposed alterations to designated heritage railway stations;
- Media reports and communications from the public and Parliamentary interest concerning the condition of some Prime Ministers’ grave sites;
- Regional public support provided to the 38 Canadian Heritage Rivers designated since program inception and the four currently nominated Canadian Heritage Rivers; and
- Public nomination of sites to the WHS Tentative List (130 sites considered in 2004; so far, over 50 sites have been identified by Canadians for consideration on the next list update).<sup>27</sup>

The Federal Heritage Building Program supports the TB Policy on Real Property Management and as such is not targeted at the public. While importance to the community is a criterion for designation, we found that there is a lack of data to determine if the public supports the nomination of individual buildings as federal heritage.

Question 2	Indicators
To what extent are the sub-programs aligned with government priorities?	<ul style="list-style-type: none"> <li>• Degree to which sub-programs align with Government of Canada Whole of Government Framework.</li> </ul>

**Expectation:** Sub-program objectives align with Government of Canada priorities.

The Other Heritage Places Designation and Conservation sub-programs are 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). These sub-programs are principally tied with the

outcome area of “A vibrant Canadian culture and heritage”, where the Government sets out to “support Canadian culture and enhance knowledge of Canada’s history and heritage, such as military history and national heritage sites.” Canadian Heritage Rivers and some World Heritage Sites also support the outcome for “A clean and healthy environment,” where program activities “aim to ensure that Canada’s environment is restored and protected, and that natural resources are used in a sustainable manner for future generations”.

<sup>26</sup> A total of 349 petitions were submitted but one petition was subsequently withdrawn by the proponent. Analysis in this report focuses on the evaluation of the remaining 348 nominated lighthouses.

<sup>27</sup> While there is clear interest related to specific sites, periodic reporting on the implementation of the World Heritage Convention in North America indicates that general public support and awareness of the program remain low in both Canada and the United States.

The Other Heritage Places sub-programs also contribute to international and intergovernmental commitments. The OHP programs in general and WHS in particular contribute to Canada's international commitment to *the Convention Concerning the Protection of the World Cultural and Natural Heritage* (1972), where member states have recognized their duty to identify, protect, conserve, present and transmit these resources to future generations. The CHRS program is the result of a federal-provincial-territorial commitment.

Question 3	Indicators
To what extent are the sub-programs aligned with federal roles and responsibilities?	<ul style="list-style-type: none"> <li>• Federal legislation, policies and directive indicate relevant roles and responsibilities.</li> <li>• PCA mandate, policies and directives indicate relevant roles and responsibilities.</li> </ul>

**Expectation:** The sub-program is clearly aligned with PCA's legislative and policy mandate and strategic outcome.

The *Parks Canada Agency Act* (1998) gives the Agency specific responsibility for the implementation of policies of the Government of Canada that relate to "other protected heritage areas and heritage protection programs", with specific reference to federal heritage buildings, heritage

lighthouses, heritage railway stations, and Canadian heritage rivers (s.6). With the exception of Prime Ministers' Grave Sites, authority for each of the OHP programs is also defined in specific federal legislation, central policy, and/or international and intergovernmental agreements. Authorities for each program are as shown in the table below.

**Table 7. Authority for OHP Programs**

Program	Authority
Federal Heritage Buildings	Treasury Board Policy on Management of Real Property (2006) <sup>28</sup>
Heritage Railway Stations	Heritage Railway Stations Protection Act (1990)
Heritage Lighthouses	Heritage Lighthouse Protection Act (2008)
Grave Sites of Canadian Prime Ministers	House of Commons Motion and related Ministerial decision (1998)
World Heritage Sites	Convention Concerning the Protection of the World Cultural and Natural Heritage (World Heritage Convention) (1972) <sup>29</sup>
Canadian Heritage Rivers	Canadian Heritage Rivers Charter (1997, renewed in 2013)

Additional responsibilities for the Agency in several programs in the OHP envelope are indirectly established by the *Historic Sites and Monuments Act* (2013)<sup>30</sup> which designates Parks Canada as the HSMBC Secretariat.

<sup>28</sup> Replaced the TB *Heritage Buildings Policy* (1982).

<sup>29</sup> Canada became a signatory to the Convention in 1976.

<sup>30</sup> Act last amended in 2013; role of HSMBC established in original Act (1953).



Parks Canada has also developed policies and guidance to support the sub-programs, including:

- *Canadian Heritage Rivers Policy* (1994), outlines how Parks Canada will implement its responsibilities for the coordination of the CHRS as well as its own participation in nominating, designating and managing rivers under the Minister's authority.<sup>31</sup>
- *Heritage Railway Stations Policy* (1994), establishes processes for identifying and evaluating heritage railway stations; for specifying, where applicable, the features that give them heritage value; and for reviewing on a case-by-case basis any intervention that might affect them or their heritage features.
- *Standards and Guidelines for the Conservation of Historic Places in Canada* (2010), adopted as the benchmark for assessing proposed conservation interventions on the character-defining elements of an historic place.

## 4.2 PERFORMANCE

### 4.2.1. Outputs

Question 4	Indicators
To what extent are activities taking place and expected outputs being produced?	Designation: <ul style="list-style-type: none"> <li>• Evaluations completed</li> <li>• Advice and review for WHS and CHRS nominations</li> <li>• Directories of designated heritage places</li> <li>• PM Grave Sites commemorated</li> </ul> Conservation: <ul style="list-style-type: none"> <li>• Reviews of proposed alterations, transfers, sales and disposals</li> <li>• Conservation/maintenance plans</li> <li>• Monitoring reports</li> </ul>

#### 4.2.1.1 Designation Activities and Outputs

**Expectation:** Key outputs are planned and produced consistent with commitments.

Our evaluation identified three key activities common to each program under the OHP Designations sub-program:

1. Identification and prioritization of heritage places for designation;
2. Evaluation of eligible heritage places; and
3. Communication of designations to the public and to proponents/custodians of heritage places.

Given that these activities are critical to the success of the sub-program, our evaluation thus focused on the extent to which outputs related to these designation activities were being produced consistent with commitments. Our findings are as outlined below.

<sup>31</sup> The CHRS Principles, Procedures and Operational Guidelines (2014) further detail the overarching principles of the program, its governance structure, the nomination and designation process, and its monitoring regime.

### Systems are in place to identify targeted outputs

Each of the programs in the OHP Designations envelope has a system in place to identify eligible heritage places. For federal government programs, the number of eligible sites is relatively close-ended; eligibility is established as a result of a legislative or policy requirement. The inventory of eligible sites includes:

- More than 20,000 federally owned buildings that are 40 years or older.<sup>32</sup>
- 348 lighthouses for which Parks Canada received a petition from May 2010 to May 2012. The petition process for heritage lighthouses is now closed.
- A small number of railway stations (mostly built in 1970's). A list of eligible stations was created by the program but has not been updated;<sup>33</sup> program staff estimate that there are three stations that may reach the age of eligibility within the next five years.

Under the TB Policy, custodian federal departments/agencies are responsible for monitoring their own inventory of real property to identify and submit eligible buildings. Since 2009, submissions were received from 16 different custodial departments/agencies with 92% of the submissions from just six custodians (i.e., Agriculture and Agri-Food Canada (AAFC), Corrections, Department of National Defence (DND), National Capital Commission (NCC), PCA, and the Royal Canadian Mounted Police (RCMP)). Parks Canada has encouraged departments and agencies to develop their own processes to identify eligible buildings and prioritize nominations. These entities are encouraged to work with FHBRO to develop guidelines and annual plans that will help them determine the order in which their requests for evaluations should be submitted. Compliance with the submission process is not monitored by FHBRO to determine if all eligible buildings are actually being submitted.

By contrast, while they also have nomination criteria, the shared programs are more open-ended in their scope of places that could be designated. This increases the importance of systems to identify and prioritize potential nominations.

In 2010, based on approved frameworks that define what is meant by "Canada's river heritage",<sup>34</sup> the CHRS program completed a gap analysis identifying designations needed to complete the system, with a focus on currently under-represented natural and cultural elements. This analysis found that there are 16 rivers that would be capable of representing more than one of the under-represented elements (see Appendix F). These rivers are thus priorities for designation. The CHRS now strongly encourages nominations that will help to attain the goal of a representative system of rivers by 2018.

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<sup>32</sup> As per Treasury Board Directory of Federal Real Property; most of these buildings have already been evaluated by FHBRO.

<sup>33</sup> Program staff consider the risk related to this gap to be low. Work to nominate and designate heritage railway stations is now mostly complete with an estimated 308 stations evaluated since program inception. At this point, most railway stations that are likely to have heritage value have either already been designated or are not eligible (i.e., not owned by a relevant railway company).

<sup>34</sup> *A Framework for the Natural Values of Canadian Heritage Rivers*. 2<sup>nd</sup> Edition, CHRS, 2001. *A Cultural Framework for Canadian Heritage Rivers*. 2<sup>nd</sup> Edition, CHRS, 2001. First editions of each were adopted by the Board in 1997.

As discussed, Parks Canada also maintains a Tentative List to focus work on World Heritage Sites. UNESCO's World Heritage Committee suggests that each party's Tentative List be updated every 10 years and that updates should prioritize under-represented themes. Canada's current Tentative List dates to 2004; no decision has been made on when or how this list will be updated.<sup>35</sup>

### Heritage places nominated for designation are being evaluated

We found that each of the programs in the OHP Designations sub-program were completing evaluations of nominated places and that these evaluations were resulting in places being designated (for discussion of system progress, see outcomes). During the period under evaluation, Parks Canada:

- Completed 2,118 FHBRO evaluations from 2009-10 to 2013-14.<sup>36</sup> The majority (84%) of FHB evaluations completed were screenings, 14% were benchmark evaluations, and 3% were formal evaluations (see definitions in text box).

- Completed 166 heritage lighthouse evaluations from May 2012 to October 2014. Of these, 129 had been reviewed by the HSMBC. Parks Canada had prepared or was preparing a Statement of Significance for those lighthouses where designation was recommended.

- Evaluated the two railway stations nominated for heritage designation since 2009. One was designated (2011) and one was found to be ineligible.

- Attempted to communicate with the descendants of the Right Honourable John Joseph Caldwell Abbott about

commemoration of this grave site. To date, only his grave and that of the Right Honourable Pierre Elliot Trudeau, at the request of the family, have not been fully commemorated by the program.

- Funded or jointly funded five background studies, nomination or designation documents in support of four nominated heritage rivers and prepared communications to senior officials on river nominations or expanded designations. The CHR Board Secretariat also represented Parks Canada in negotiations for an Inuit Impact Benefit Agreement for Heritage Rivers in Nunavut.
- Supported the nomination of two recently designated WHS administered by the Agency through funding and Parks Canada's in-kind expertise in protected heritage places; Landscape of Grand-Pré

Federal Heritage Building Evaluations		
FHBRO determines which of three methods of evaluation is most appropriate for the building being evaluated. Standard evaluation criteria are used to ensure consistency. Scores based on the evaluation indicate the level of classification: Classified (75-135 points); Recognized (50-74 points); or not designated (<50 points).		
Evaluation Type	When Used	Description
<b>Formal Evaluation</b>	Buildings <u>likely</u> to be designated.	Preparation of a full research report and an evaluation meeting involving the full Federal Heritage Building Committee. <sup>37</sup>
<b>Benchmark Evaluation</b>	Buildings that <u>may</u> meet minimum score.	Preparation of a short research report that includes comparative examples. Custodian may request formal evaluation.
<b>Screening</b>	Buildings displaying minimal/absence of heritage value.	Evaluation based on custodian submission. No additional research is conducted. Custodian may request a benchmark or formal evaluation.

<sup>35</sup> The 2004 Tentative List for the World Heritage Site program identifies 7 sites that have yet to be designated.

<sup>36</sup> An additional 455 submissions were not subject to an evaluation for a variety of reasons (e.g., building already evaluated, not yet 40 years old, it is exempt, or is not a "building").

<sup>37</sup> FHBC is an interdepartmental and multidisciplinary advisory committee, which provides expert advice on issues concerning the conservation of federal heritage buildings. It is chaired by the Manager of FHBRO.

(2012)<sup>38</sup> and Red Bay Basque Whaling Station (2013).<sup>39</sup> PCA also provided advice and review to proponents in support of the ongoing submission process for three additional sites not administered by the Agency (Pimachiowin Aki, The Klondike and Mistaken Point).

### **Designations are being communicated**

Sharing the heritage value of designated heritage places is an essential element of effective cultural resource management. We found that Parks Canada maintains various tools to publicly communicate designations related to federal programs – e.g., Directory of Federal Heritage Designations (DFHD) and Directory of Heritage Railway Stations (see Appendix C). In addition, in 2009-10, Parks Canada spent close to \$5M towards the creation of the Canadian Register of Historic Place (CRHP). When fully completed, this register will provide a single source of information about all historic places recognized for their heritage value at the local, provincial, territorial and national levels throughout Canada.<sup>40</sup> The CHRP and the HSMBC Secretariat are currently working together to update the list of heritage railway stations, and to improve information about them.<sup>41</sup>

Such public records are important to communicate the heritage value of federally designated places as for most designations (i.e., FHB and Railway Stations) there are usually no plaques or other markings installed to commemorate the place. In principle, all designated heritage places should be listed in each relevant registry. However, unless also subject to another designation, heritage lighthouses and PM Grave Sites are not listed in any of these registries. While the DFHD has reportedly been modified to allow for heritage lighthouse designations to be entered, as of April 2015 no related records had yet been added. The only source of information on heritage lighthouses is a list of petitioned and designated lighthouses on the Parks Canada website. Similarly, there is a list of former Prime Ministers on the Parks Canada website which provides the location of their grave sites and a summary of key accomplishments. This was also made into a printed brochure.

As shared programs, Canadian Heritage Rivers and World Heritage Sites are not included in any of these registries. Records of related nominations and designations are found on the program's respective websites (CHRS website is maintained by PCA;<sup>42</sup> WHS website by UNESCO).

### **Other heritage places are being commemorated**

As previously discussed, programs for federally-owned heritage included in the evaluation lack a commemoration component. However, where relevant, we found that Parks Canada was participating in the commemoration of other heritage places.

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<sup>38</sup> Nomination process spearheaded by Nomination Grand Pré, which included area residents, the farming community, the Mi'kmaq of Nova Scotia, the Société Nationale de l'Acadie, and all levels of government.

<sup>39</sup> Nomination process spearheaded by a nomination committee that included area residents and all levels of government; chaired by member of the Labrador Straits Historical Development Corporation.

<sup>40</sup> Unless subject to another heritage designation, the grave sites of deceased Prime Ministers are currently excluded from this list.

<sup>41</sup> Heritage Character Statements for federal railway stations are expected to accompany all existing records on the Canadian Register.

<sup>42</sup> Starting in 2010, the CHRS Secretariat has been completing a major redesign of the program's website including new content and graphic design.

The grave site of the Right Honourable Louis St. Laurent was commemorated in September 2009. The ceremony involved the installation of an information panel on the life and accomplishments of the prime minister.

Parks Canada, as CHRS Secretariat, produced bronze plaques and developed communications for plaque unveiling ceremonies for two designated rivers, i.e., the Bloodvein River (2010) and St. John River (2013). The ceremonies were otherwise the responsibility of the jurisdictions where the site is located.

Ceremonies and plaques used to commemorate WHS are the responsibility of the jurisdiction where the site is located. A plaque unveiling ceremony was held at the Landscape of Grand-Pré WHS in July 2012 and the Red Bay Basque Whaling Station WHS in July 2014; these ceremonies were not led by Parks Canada.

#### 4.2.1.2 Conservation Activities and Outputs

##### Reviews of interventions are being completed

**Expectation:** Key outputs are planned and produced consistent with commitments.

The Federal Heritage Building and Heritage Railway Station programs both have requirements for the review of proposed interventions (i.e., sales, transfers, alterations or demolition). We found that these programs were completing reviews of interventions as required.<sup>43</sup>

During the period evaluated, Parks Canada conducted 493 Reviews of Intervention (ROI) of federal heritage buildings. At the end of the period, 43 ROI submissions were still awaiting review. Over the five year evaluation period, both the number of submissions and the number reviews completed per year was in decline (see Table 8).

**Table 8. Review of Intervention (ROI) Submissions and Reviews Completed**

	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Submissions	131	114	113	94	84	536
Reviews	111	112	101	89	80	493

This data also suggests that the increased number of designated places has had limited impact on the workload of the sub-program. For example, while the number of classified federal heritage buildings increased by 2 since 2009, the number of submissions for reviews of interventions has actually decreased and the Agency's ability to review these submissions has remained relatively stable. This suggests that the target in the PMF will continue to be met.

Over this period, Parks Canada also completed formal reviews of 8 proposed alterations and 12 proposed sales or transfers of heritage railway stations. At the end of this period, only two proposals

<sup>43</sup> There is no requirement for Parks Canada to monitor compliance of other custodians in these processes. In 2007, the Office of the Auditor General found that some departments had not consulted FHBRO before carrying out interventions on classified buildings. Program staff also believe that some minor maintenance may occur at railway stations that owners are not aware should be submitted for review.

were still awaiting decision.<sup>44</sup> The program also provided additional advice on small maintenance projects at federal heritage buildings and heritage railway stations that were not likely to have a significant impact on the heritage character of the structure (e.g., repainting in the same colour, changing light bulbs, etc.). However, evidence suggests that the workload of the Heritage Railway Stations Program may also be in decline. Since its inception, an estimated 86 of 163 designated stations have been transferred to third parties and so no longer require federal review of proposed changes.

### **National Program for the Grave Sites of Canadian Prime Ministers identified conservation priorities**

The Program for Prime Ministerial Grave Sites maintains conservation maintenance plans to identify the significant resources at each grave site, including those of deceased Prime Ministers whose grave sites have yet to be commemorated. These were all completed at the outset of the program, from 2000 to 2002. During the evaluation period, formal inspections were completed to evaluate the condition of each grave site against this baseline and to identify priority interventions. These inspections resulted in monitoring reports on the state of each gravesite, completed in 2011. The recommendations in these reports were used to prepare a document summarizing conservation priorities and providing a proposed schedule for work from 2012 to 2016.

### **Shared programs are not producing some monitoring reports**

Parks Canada is responsible for periodically monitoring and reporting on the condition of Canadian Heritage Rivers or World Heritage Sites it owns or administers. Rivers designated to the CHRS undergo reviews every ten years with in-depth monitoring reports produced to detail the state of the rivers' heritage values. Since 2009, we found that Parks Canada had produced a ten-year monitoring report for four heritage rivers it administers (i.e., the Athabasca River, North Saskatchewan River, Kicking Horse River and the Rideau Waterway) and had contributed funding to the preparation of ten- and twenty-year monitoring reports for an additional 14 designated rivers administered by partners.

The CHRB Secretariat is also responsible for coordination of national reporting on the system. It released its last annual report in 2010-11.<sup>45</sup> Following resource reductions in 2011, the Secretariat produced a strategic communications plan to refocus its efforts. Decisions about whether to continue with national reporting and at what interval are still ongoing.

Since 2001, the CHRS Principles, Procedures and Operational Guidelines also require that each jurisdiction report annually on the state of heritage rivers under its administration.<sup>46</sup> This commitment was restated in the program's 2008-2018 Strategic Plan. Annual reports are to be provided to Parks Canada as the Secretariat for the Board.

Table 9 shows that annual reports are not regularly being received for all heritage rivers, including those administered by Parks Canada.

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<sup>44</sup> Data on Heritage Railway Stations was only available up to September 2013; Minutes from HSMBC Meeting in Spring 2014 were not yet approved at time of writing.

<sup>45</sup> Annual reports for each fiscal year described the achievements of the CHRS program against its priorities and provided updates on the status of the rivers and of nominations and designations to the System.

<sup>46</sup> Three rivers located in Nunavut are exempt from annual reporting due to ongoing IIBA negotiations.

**Table 9. Number of Annual Reports Submitted to the Secretariat**

	2009-10	2010-11	2011-12	2012-13	2013-14
<b>Total Number of Reports (including PCA)</b>	26 of 35	20 of 35	20 of 35	26 of 36	28 of 36
<b>Reports for PCA-Administered Rivers</b>	4 of 6	2 of 6	0 of 6	0 of 6	5 of 6

For Parks Canada, the preparation of these reports is the responsibility of relevant field units. Staff for some field units told us that they were unaware of these reporting requirements. Others referred to alternate reporting formats, such as annual Parks Management Planning Reports, but we found that these did not contain specific references to Canadian Heritage Rivers. The CHRS Secretariat has not requested that the missing reports be completed or followed-up with field units to determine why reporting requirements are not being met.

For World Heritage Sites, Parks Canada has been meeting its international reporting requirements. Since 2009, Parks Canada has coordinated:

- The Periodic Report on the Application of World Heritage Convention in Canada (2012)
- Reactive reports following concerns raised about two WHS in Parks Canada's jurisdiction (Waterton Glacier International Peace Park WHS, 2008-2010 and Gros Morne National Park WHS, 2013-14). In both cases, the findings by UNESCO were that no threat was imminent.
- One proactive report on redevelopment along the Rideau Canal WHS.

#### 4.2.1.3 Effective Support for Designation and Conservation

While there are parts of the designation and conservation process that are not managed by Parks Canada, we found that the Agency provides support to responsible jurisdictions, custodians or proponents to help ensure that nominations and conservation are effective. Table 10 outlines the various forms of support related to each relevant program.

In addition, to support effective conservation, Parks Canada maintains the *Standards and Guidelines for the Conservation of Historic Places in Canada*. This document, developed as a joint federal-provincial-territorial collaboration, was updated in 2010. It serves as maintenance criteria for each of the federal government programs in the OHP envelope and is applied in the conservation of cultural resources in all sites owned or administered by Parks Canada.<sup>47</sup>

**Table 10. Support for Effective Designations and Conservation in OHP Programs**

Program	Description of Support Provided
Federal Heritage Buildings	<ul style="list-style-type: none"> <li>• <i>A Guide to Working with the Federal Heritage Buildings Review Office</i> (2009), including checklists of required actions.</li> <li>• Templates – e.g., Preliminary Information Sheet for designations.</li> <li>• Training – FHBRO held 10 introductory training sessions since 2009-10, where it trained more than 190 departmental FHB coordinators and their consultants.</li> </ul>

<sup>47</sup> *Standards and Guidelines* were adopted as the official maintenance criteria for Heritage Lighthouses. For all other programs, it serves as the criteria against which Parks Canada assesses interventions. While use is suggested, there is no requirement for other federal custodians of heritage buildings or railway companies to apply this guidance.

Heritage Lighthouses	<ul style="list-style-type: none"> <li>• Website launched in 2009.</li> <li>• Held community meetings to encourage public to submit petitions.</li> <li>• Developed tools to support nominations – e.g., program brochure, nomination package, and petitions template.</li> <li>• Links owners to comprehensive guides and manuals specific to care and maintenance of lighthouses produced by the international lighthouse conservation community.</li> <li>• Conservation guidance to be used by federal custodians.</li> </ul>
Heritage Railway Stations	<ul style="list-style-type: none"> <li>• Website with basic information on designation process and outline of requirements for applications for interventions.</li> </ul>
PM Grave Sites	<ul style="list-style-type: none"> <li>• Conservation maintenance plans as a reference tool for cemetery and Park Canada field unit staff.</li> </ul>
Canadian Heritage Rivers	<ul style="list-style-type: none"> <li>• Acting as CHR Board Secretariat. Since 2009, this has included but is not limited to: coordination of meetings of the CHR Board and Technical Planning Committee;<sup>48</sup> contributing to organization of two Canadian River Heritage Conferences (2009 and 2013); development and review of program strategies, policies, and work plans; and development of communications and promotional materials and events.</li> <li>• Funding and technical support to proponents of nominations and to complete ten- and twenty-year monitoring reports. Since 2009, Parks Canada has contributed funding to produce the background study, nomination or designation document for four rivers administered by partners. Program budget for financial support (i.e., contribution agreements) declined from \$90K in 2010-11 to \$54K in 2013-14.<sup>49</sup></li> </ul>
World Heritage Sites	<ul style="list-style-type: none"> <li>• Acting as WHS Secretariat. In addition to providing advice to owners of nominated and designated WHS, this includes representing Canada at international meetings and undertaking activities to raise program awareness (e.g., commemorative stamp program).</li> </ul>

#### 4.2.2. Outcomes

Question 5	Indicators
To what extent is there progress towards expected outcomes for OHP Designations and Conservation?	<p>Designation:</p> <ul style="list-style-type: none"> <li>• Trend in system growth</li> <li>• Progress against corporate targets</li> </ul> <p>Conservation:</p> <ul style="list-style-type: none"> <li>• Evidence of improved condition of PM Grave Sites</li> </ul>

<sup>48</sup> Technical Planning Committee is made up of planners employed by the provincial and territorial agencies participating in the CHRS program; prepares various studies and plans to support the work of the Board.

<sup>49</sup> Budget for financial support in 2014-15 is \$17K.



## 4.2.2.1 Designation Outcomes

**Expectation:** Parks Canada programs support the designation of other heritage places.

While specific targets differ, programs within the Other Heritage Places Designation envelope share a common outcome – to ensure that other heritage places of national or international significance are identified, designated and communicated to Canadians. As shown in the following table, we found that most

of the OHP programs had made some progress towards this outcome during the evaluation period. The greatest increases were in the number of federal heritage buildings and heritage lighthouses designated, a result of the relatively large number of eligible sites being evaluated.<sup>50</sup>

**Table 11. State of the System, by OHP Program and Fiscal Year**

Jurisdiction	Program	Designation Status	Number as at March 31 <sup>st</sup>					Total Change
			2010	2011	2012	2013	2014	
Federal	FHB	Recognized	1043	1051	1051	1065	1058	+15 <sup>51</sup>
		Classified	271	271	271	271	273	+2
	Lighthouses	Designated <sup>52</sup>	n/a	n/a	0	4	13	+17
	Railway Stations	Designated	162	162	163	163	163	+1
		Protected	84	83	79	79	77	-7
	Gravesites	Commemorated	13	13	13	13	13	--
Shared	CHRS	Designated	37	37	37	38	38	+1
	WHS	Designated	15	15	15	16	17	+2

### Parks Canada is on track to meet its designation-related targets

We found that Parks Canada is on track to meet its specific designation targets for Federal Heritage Buildings, Heritage Lighthouses and World Heritage Sites.<sup>53</sup> Specific details of progress achieved are outlined below.

**Federal Heritage Buildings:** From 2009-10 to 2013-14, the target for the FHB Program was to evaluate 400 federal buildings per year, based on a three-year average. The number of evaluations of federal heritage buildings completed by fiscal year and corresponding three-year average is shown below.

<sup>50</sup> In comparison, the system of National Historic Sites grew from 2,017 in March 2010 to 2,096 in March 2014 (i.e., an increase of 79 designations).

<sup>51</sup> This is the net change. Available data for 2012-13 and 2013-14 shows eight buildings were removed from the list of 'Recognized' federal heritage buildings after completing disposal processes. There is no record of any 'Classified' buildings being delisted during the evaluation period.

<sup>52</sup> Petition period was open from May 2010 to May 2012; no designations were expected in 2010 or 2011.

<sup>53</sup> The Agency has no designation targets for Heritage Railway Stations or PM Grave Sites. Although not part of its PMF, Parks Canada has committed to work with partners to establish a comprehensive system of Canadian Heritage Rivers by 2018. During the evaluation period, there were three rivers progressing through the CHRS designation process – the Ottawa River (nominated in 2007); the Saskatchewan and South Saskatchewan Rivers (nominated in 2012); and the Saint John River (designated in 2013). None of these rivers, or any other rivers on the priority list, are under the jurisdiction of Parks Canada.

**Table 12. Evaluations of Federal Heritage Buildings, by Fiscal Year**

	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
<b>Evaluations Launched</b>		457	755	566	385	209	116
<b>Evaluations Completed</b>	919	592	585	469	573	251	240
<b>Average Completed (3 yr)</b>			698	548	542	431	348

Source: FHB Program Database

Our calculations show that the program's target was met every year from 2009-10 to 2012-13. In 2013-2014, the target was missed. This reflects the decrease in the number of buildings being submitted for evaluation and the subsequent reduction in the number of evaluations being completed. Program staff suggested that the decrease in the number of building being sent for evaluation may be due to a change in government strategy involving more use of leased office space and less reliance on construction and ownership of real property.

As noted, the Agency's FHB target changed in 2014-2015 to focus on completion of "...95% of evaluations for federal buildings submitted to Parks Canada by March 2015". For the Agency's PMF 2015-16, this target has been further refined to target an evaluation of 95% of federal buildings submitted within six months of receipt. Data from 2009-10 to 2014-15 shows that, on average, FHBRO has completed evaluations on 70% of buildings submitted within this six-month targeted timeframe. However, the average timeframe to complete evaluations improved dramatically in 2013-14, with 98% of evaluations completed within six months. This suggests that the new PMF target may be achievable.

**Heritage Lighthouses:** The Agency's target to "review 100% of the lighthouses nominated for Heritage Lighthouse designation by May 2015" was introduced in 2014. This is a response to the Heritage Lighthouse Protection Act's requirement that the Minister must, by May 2015:

- Consider all lighthouses for which a petition was received; and
- Determine which of them should be designated as heritage lighthouses and make the appropriate designations.

We found that, following initial delays, the Agency is now progressing rapidly through its evaluation of petitioned lighthouses. As of October 2014:

- 21 lighthouses (6% of total petitioned) had reached the stage of Ministerial Decision.
- 129 lighthouses (37% of total petitioned) had been evaluated by the HSMBC; advice on 64 (18% of total) was ready or near ready to be sent to the Minister.
- 182 lighthouses (52% of all petitioned lighthouses) surplus to government requirements were still missing confirmation that a third party would agree to acquire the site and conserve its heritage value. DFO is the owner of these lighthouses and must negotiate agreements with third parties, based on an accepted business case, prior to Parks Canada evaluating the place.<sup>54</sup>

We were told that Parks Canada, in discussion with DFO, is preparing a strategy to ensure that the Minister will be able to consider all petitioned lighthouses before the deadline of May 2015.

<sup>54</sup> The Act does not impose time limits on eligible buyers to express interest in and submit an application for purchase.

**World Heritage Sites:** In 2014-15, the Agency introduced the target to “provide advice and review of 3 nominations for Canadian World Heritage Sites by March 2015”. As noted, seven of the 11 sites on Canada’s Tentative List (2004) have yet to be designated. Currently, three of these sites are considered to be “active”, meaning that PCA has ongoing communications with the proponents to support developing the content of the nomination and/or in relation to the nomination process.<sup>55</sup> Parks Canada has a role in the administration of one of these sites (i.e., The Klondike), but the Agency is not the key proponent of the nomination.<sup>56</sup> Based on evidence reviewed (e.g., emails, edited documents), we found that Parks Canada plays a role in advancing these nominations by advising sites on the information required for a nomination and the quality of the information presented.

#### 4.2.2.2 Conservation Outcomes

**Expectation:** Parks Canada programs support the conservation of other heritage places.

The Agency’s target related to OHP Conservation is that “Parks Canada programs support the conservation of cultural resources at historic places administered by others”. The core objective of each OHP program is to ensure that the defining elements leading to a heritage designation are conserved over time.

However, it is ultimately the custodian or owner who controls conservation outcomes.

As discussed elsewhere in this report, for shared jurisdictional programs and the National Program for the Grave Sites of Canadian Prime Ministers, there are monitoring and reporting processes that can provide a snap shot of the extent to which long term conservation is taking place at each site.

However, there is no requirement in policy or legislation for Parks Canada to monitor the status or condition of designated places it does not own or administer.<sup>57</sup> As a result, there is no way to assess the extent to which custodians of Federal Heritage Buildings, Heritage Railway Stations and Heritage Lighthouses:

- Actively maintain their structures (as opposed to allowing them to deteriorate, commonly referred to as “demolition by neglect”);<sup>58</sup>
- Seek and/or follow advice provided by the Agency;<sup>59</sup> or
- Comply with other relevant provincial or municipal conservation regimes (e.g., in cases where structures are transferred to third parties).<sup>60</sup>

<sup>55</sup> Active sites are Pimachiowin Aki, The Klondike, and Mistaken Point.

<sup>56</sup> Three additional sites on the list are administered in whole or in part by PCA; these sites are not currently actively engaged in the nomination process.

<sup>57</sup> This is also true of National Historic Sites that are not owned or administered by Parks Canada.

<sup>58</sup> There is no legislated requirement for owners to maintain designated Heritage Railway Stations.

<sup>59</sup> In 2007, the Auditor General (Chapter 2 – Conservation of Built Heritage) found evidence of custodians of undertaking interventions of Federal Heritage Buildings without first consulting FHBRO. The extent to which this still occurs is unknown.

<sup>60</sup> In principle, through the sale or transfer agreement, new owners of designated federal buildings, heritage railway stations, or heritage lighthouses must agree to seek an alternate provincial or local heritage designation or otherwise agree to conserve the heritage character of the structures but the extent this occurs after the disposal is complete is unknown.

#### 4.2.2.3 Conservation of PM Gravesites

**Expectation:** In cooperation with interested parties, PCA effectively ensures the conservation of Prime Ministers' grave sites.

The one OHP program where Parks Canada has a specific role for conservation outside its existing network of sites is the National Program for the Grave Sites of Canadian Prime Ministers. The conservation maintenance plan and monitoring report for each grave site together give the program a baseline knowledge of the state of each gravesite and conservation work needed.

The latest monitoring reports identified a total of 170 recommendations for conservation actions. The majority of these recommendations are for minor work (e.g., routine washing of markers). This work is assigned to the relevant field unit working in cooperation with the cemetery but the program does not monitor their work to confirm that recommendations are being addressed. Some grave sites were confirmed to require more complex work to be completed only by experienced conservation specialists; this work is directed by the National Office (i.e., Commemoration Branch). From 2009 to 2011, this Branch made a significant investment in conservation work at the Right Honourable Alexander Mackenzie grave site (Sarnia, Ontario).

#### 4.2.3. 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.

As noted in previous evaluations, 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. As much as possible, we try to inform the reader when such cases are identified, but our work is not to generate new financial data or validate its accuracy.

Question 6	Indicators
To what extent is the sub-program efficient and economical?	<ul style="list-style-type: none"> <li>• Cost to produce a given level of output.</li> <li>• Cost of inputs for a given level of result.</li> <li>• Estimates of staff time.</li> <li>• Time to complete process compared to service standard/notional timeline.</li> <li>• Extent management has used available flexibilities to encourage efficient or economical operations.</li> </ul>

## 4.2.3.1 Description of Expenditures and Project Costs

**Expectation:** Costs of producing outputs are known and verified.

Designation and conservation activities are delivered at the least cost to the Agency.

Staff time is efficiently allocated among the Other Heritage Places programs.

The expenditures for the OHP Designation and Conservation sub-programs are presented in Table 13. Expenditures for OHP Designations include all work related to designating places under all programs in the OHP envelope except PM Grave Sites.<sup>61</sup> Expenditures for OHP Conservation include all programs in the OHP envelope and other work related to activities supporting historic places outside NHS (e.g., *Standards and Guidelines*, Canadian Register of Historic Places). The numbers in the table are likely over-estimated as they include \$4.3M allocated to 'Treasury' that could not be isolated in the financial system

(about 16% of total expenditures).<sup>62</sup> They also include minimal expenditures related to other international programs that could not be isolated in the financial system.

**Table 13. Expenditure Data by OHP Sub-Program**

Sub-Program	Expenditures by Fiscal Year (\$)					Total (\$)
	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	
<b>OHP Designations (1031)</b>	1,738,753	1,617,096	1,032,487	1,162,524	506,791 <sup>a</sup>	6,057,651
<b>OHP Conservation (2072)</b>	4,117,125 <sup>b</sup>	2,922,759	2,832,970	2,523,222	2,646,029	15,042,105
<b>Total</b>	5,855,878	4,539,855	3,865,457	3,685,746	3,152,820	21,099,756

**Notes:**  
a - Total excludes about \$6.6M for TransCanada Trail fundraising.  
b - Total excludes about \$5M transferred to provinces to build the Canadian Register of Historic Places.

Source: PCA Financial System (STAR)

Based on our analysis, we are able to make some high level observations of the organizational units responsible for spending and the nature of the expenditures (see Appendix G for details).

We noted the following:

- The total expenditures for both sub-programs represent less than 1% of the Agency's total expenditures in these years.
- For comparison, the expenditures for OHP designations are equivalent to about 35% of the yearly spending on the NHS Designations sub-program (i.e., on average about \$2M more per year spent on NHS Designations over the same period).
- The majority of expenditures are incurred in National Office, particularly in the Heritage Conservation and Commemoration Directorate (e.g., depending on the year, roughly 60% to 80%).
- On average, most expenditures over the evaluation period were related to Salaries (63%), followed by Goods and Services (38%) and limited Grants and Contributions (<1%). Salary expenditures ranged from 51 to 73% of total expenditures by year.

<sup>61</sup> PM Gravesites Program does not have a designation component; commemoration activities are coded to OHP Conservation.

<sup>62</sup> 'Treasury' is understood to include funds reallocated to internal services, to other government departments, and other internal reallocations. The purpose of these reallocations could not be determined.

The costs of the individual programs are not consistently captured in the Agency's financial system. Program staff were able to provide some additional data and clarifications. Our analysis of this information allows us to tentatively conclude that:

- Of the six programs we evaluated, the Federal Heritage Buildings Program appears to be the most material. In 2013, the program estimated annual expenditures of close to \$1M. About 50% of this is paid to PWGSC's Heritage Conservation Directorate for advice received as part of a Shared Service Agreement (SSA).<sup>63</sup> There are indications that the program's expenditures have been increasing on an annual basis.
- The Heritage Lighthouse Program did not exist at the beginning of the evaluation period but since the Heritage Lighthouses Protection Act came into force (May 2010), program expenditures have remained relatively stable at an average \$280K per year.<sup>64</sup>
- The PM Grave Sites Program consumes limited resources. In 2012, program staff estimated that a total of only \$600K had been spent on the program since its inception in 1999.
- Excluding salary, expenditures on the CHRS Program remained relatively stable from 2009-10 to 2012-13 (average \$125K per year). However, salary expenditures decreased by an estimated 70% when the program allocation was cut from 3 FTE to 1 FTE in 2011.

There was insufficient data available to estimate how much was spent on either the Heritage Railway Stations or the World Heritage Sites program.

#### 4.2.3.2 Organizational Efficiency

As noted, allocation of FTE resources to individual secretariats for the various programs is relatively minimal. Table 14 below shows manager and staff positions (i.e., 13 positions in the right hand columns) with the positions or portions of positions dedicated exclusively to the secretariat functions.<sup>65</sup> The portion of the executive level positions allocated to the programs is not known although it can be assumed to be small.

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<sup>63</sup> In 2011, PWGSC completed an *Evaluation of Heritage Conservation Services*. See report: <http://www.tpsgc-pwgsc.gc.ca/bve-oae/rapports-reports/2008-608/2008-608-eng.pdf>

<sup>64</sup> Prior to May 2010, there were some minor expenditures related to program establishment.

<sup>65</sup> By comparison, there are 3 FTEs dedicated to the NHS Designations sub-program.

**Table 14. OHP Staff Classifications and Estimated FTEs**

Program	Reports to:	Staff Classification and FTE Estimate	
		Manager	Staff
Federal Heritage Buildings	Director PCX-02	PM-06 (0.33 FTE)	PM-05 (1 FTE) PM-04 (1 FTE) AS-01 (1 FTE)
Heritage Lighthouses	Director PCX-01	PM-06 (1 FTE)	PM-04 (1 FTE) PM-03 Term (0.15 FTE) Student (0.60 FTE)
Heritage Railway Stations		PM-05 (0.4 FTE)	none
PM Grave Sites		PM-05 (0.15 FTE)	none
CHRS	Director PCX-02	PM-05 (1 FTE)	none
International Programs	Vice President PCX-05	PM-07 (0.25 FTE)	PM-06 (1 FTE) SE-REM-02 (0.2 FTE)

Source: Estimates provided by Program Staff; table shows organization as of November 2014<sup>66</sup>

Other employees in the Archaeology and History Branch in National Office and in PWGSC support most of the OHP secretariats through the completion of historical research and evaluations. Additional support is provided by the Cultural Resource Advisor responsible for each field unit who may take lead responsibility for work on-site. Financially, consultants/contractors are engaged on an as needed basis to complete some evaluation work. We were not able to document/quantify the extent of this supplementary work force (i.e., FTE equivalents or expenditures) and are unable to quantify the overall efficiency of the process and workflow between and within various units involved in the processes.<sup>67</sup> There is mixed qualitative information on the FHB process with some managers reporting that the MOU with PWGSC for some kinds of work has been useful for controlling costs and supporting workflow while others note that the nature of PWGSC's expertise was not always appropriate for the kinds of evaluations required in the program and, as a result, the program was required to do additional rework to complete projects.

#### 4.2.3.3 Process Times

As a measure of program efficiency, we evaluated the time required to move through all stages of the designation process or to review proposed interventions to designated resources. As outlined in the following table, we found that process times to complete heritage designations or to review proposed interventions depended largely on the program but could range from several months to several years. The range of process times shows that there can also be significant variability within each program.<sup>68</sup>

<sup>66</sup> The number of FTEs dedicated to OHP varied during the period under evaluation. Changes resulting from the 2015 reorganization of the HCCD are not reflected in Table 14.

<sup>67</sup> We did obtain some database information, for example, on processing time from the FHBRO secretariat and associated information from the Cultural Science Branch but it is difficult to reconcile the data.

<sup>68</sup> For comparison, the average process time for NHS Designations is 3.73 years (based on 81 files).

**Table 15. Comparison of Process Times for OHP Programs**

Jurisdiction	Program	Process	# Files <sup>69</sup>	Average Process Time	Range
Federal	Federal Heritage Buildings	Designation	1714	0.4 years	0 days to 4 years
		• Screening	248	1.3 years	41 days to 3.2 years
		• Benchmark	53	2.0 years	0.6 to 3.2 years
		• Formal			
		Review of Intervention	493	25-30 days	0-225 days
		Heritage Railway Stations	Designation	1	2 years
		Review of Intervention <sup>70</sup>			
		• Sale/Transfer	12	2.2 years	0.2 to 6.5 years
		• Alteration	8	1.3 years	0.6 to 2.1 years
	Heritage Lighthouses	Designation <sup>71</sup>			
		• Surplus	9	1.7 years	1-2.5 years
		• Non-surplus	10	1.7 years	1-2.5 years
Shared	CHRS <sup>72</sup>	Designation	1	5 years	n/a
	WHS	Designation (PCA sites)	3	n/a	n/a

Data was not available for process times on World Heritage Sites. Given UNESCO's process deadlines, time from formal submission to designation for all files in approximately 1.5 years. However, program estimates suggest years of background work (e.g., historical research, community consultation, etc.) are required before a nomination reaches the stage of formal submission. Currently nominated or recently designated World Heritage Sites have been on the Tentative List since 2004, suggesting close to a decade of possible work on some files. For sites outside Agency jurisdiction, most responsibility for completing this work is not the responsibility of PCA and this time is not tracked.

### Additional Observations on Federal Heritage Buildings

The Federal Heritage Building program is unique among programs evaluated in that it maintains notional timelines for each level of heritage evaluation. Table 16 compares these notional timelines against the average time required to actually complete each level of evaluation. We found that while most (66%) of screenings were completed within the suggested timeframe, the majority of benchmark and formal evaluations were not. Time to complete most formal evaluations was about double the suggested limit. However, the average time required to complete all levels of evaluation decreased over the evaluation period. For 2013-14, only benchmark studies were not completed within the notional timeline.

<sup>69</sup> Number of files where evaluation/review process was completed during evaluation period and for which information was available for computing processing times.

<sup>70</sup> This data includes only those files where approved work would require an Order in Council. There are approximately 20-30 additional maintenance type inquiries per year but due to the minor nature of the work involved in responding there is no data collected on processing times.

<sup>71</sup> Process time shows time from date of petition receipt to date of Ministerial decision for the 19 lighthouses that had reached this stage in process by July 2014.

<sup>72</sup> The file for the Ottawa River was completed in 2009; Ministerial decision is pending.



**Table 16. Average Length of Evaluations for FHB Program**

Type of Evaluation	Notional Timeline (Days)	Average Elapsed Time (Days) from Submission to Decision <sup>73</sup>					Overall Average (Days)
		2009-10	2010-11	2011-12	2012-13	2013-14	
Screening	Up to 120	157 (n=630)	223 (n=454)	116 (n=333)	144 (n=189)	74 (n=108)	<b>160</b> <b>(n=1,714)</b>
Benchmark	Up to 270	458 (n=103)	545 (n=88)	365 (n=36)	370 (n=17)	294 (n=4)	<b>468</b> <b>(n=248)</b>
Formal	Up to 365	747 (n=17)	887 (n=23)	504 (n=9)	530 (n=3)	218 (n=1)	<b>744</b> <b>(n=53)</b>

Source: FHBRO Program Database

In its 2015-2016 Performance Management Framework, the Agency targets a six month timeframe for the review of individual evaluations. In practice, buildings are often submitted for consideration as batches of multiple structures located at the same site (e.g., up to 44 structures in one case).<sup>74</sup> Long processing times for few batches of buildings in a given year can increase the average processing time. For example, in 2009-10, there were 630 screening evaluations. This corresponded to approximately 211 batches of buildings. The average processing time for these batches of buildings is 76 days. Two batches of buildings in particular distort the average processing time for screening evaluations for the year in question (i.e., one containing 21 buildings took a recorded 1,465 days to process; one containing 11 buildings took 674 days).

In its 2015-2016 PMF, the Agency also included an efficiency indicator: the average cost per FHB evaluation. Program estimates show that the cost per building evaluated increased from \$1,826 in 2009-10 to \$2,044 in 2011-12.<sup>75</sup> Program staff reported that the trend in increasing costs is the result of a change in the size and complexity of buildings being reviewed. Most structures now being submitted were constructed in the 1970's when the federal government built large research stations and large complexes to house departments (e.g., LB Pearson Building, Place de Portage). The architecture of these concrete and steel frame structures is relatively new to the program, making their heritage value take longer to assess. In addition, the reorganization of the Agency in 2012 means that there is less in-house research staff to complete the evaluations; some of this work must now be contracted. Although the Agency is proposing to track these unit costs in the future, it has not yet set targets or ranges of reasonable costs per evaluation.

We noted that while the Agency conducted over 2,000 evaluations of federal buildings during the five years included in the evaluation, this collective effort resulted in only 24 actual designations. All of these designations were the result of formal rather than screening or benchmark evaluations. In effect, the Agency's initial assessment used to assign a building to a particular type of evaluation based on the estimated likelihood that it will be designated (completed in just a few days or weeks of receiving an application) was 100% accurate. Given this, there may be limited value-added of a more time-consuming

<sup>73</sup> Average days calculated from date application is received to when a decision is reached on a screening or benchmark evaluation or decision on a recommendation is reached for a formal evaluation; based on files initiated in a given fiscal year.

<sup>74</sup> A "batch" is defined as a group of buildings with the same FHBRO #, submission date, and in most but not all cases, with the same decision date. In certain cases, a batch ends up being split so that a sub-group of the batch will have one decision date and the rest a second date.

<sup>75</sup> Data from an internal program business case (March 2013); more recent data not available.

screening or benchmark evaluation process. While tools exist to limit the number of screenings required, they may not be used to their full potential (see text box).

Finally, in its 2015-2016 PMF, the Agency introduced a performance indicator that targets 100% of reviews of interventions on FHB to be completed within the “required timeframe”. The FHB program’s notional timeline to complete reviews of interventions is 42 to 50 days (depending on the nature and urgency of the project). All ROI reports are drafted by the Heritage Conservation Directorate of PWGSC through its SSA and thus respect formally established deadlines. The result is that FHBRO completes 99% of ROI requests within 90 days, with the average being between 25-30 days.<sup>76</sup> Assuming the number of submissions for review continues at the same level, we concluded that the Agency’s 2015-16 performance target should continue to be met in the future.

#### 4.2.3.4 Management Constraints and Flexibilities

Management is subject to various constraints that can impact on the performance of the OHP programs, largely with regards to process times. The following is a brief description of some of these constraints.

- **Nomination and application processes are proponent-driven.** All OHP programs depend on entities outside of PCA to submit nominations or applications for review of interventions. This makes it difficult for the OHP programs to predict the number of nominations or applications likely to be received and plan work accordingly. It also makes it difficult for PCA to meet its corporate performance targets. This is also a challenge for the CHRS since it has not yet received the nominations required to have a representative system in place by 2018.
- **Process times largely controlled by entities outside PCA.** Records related to the Federal Heritage Building, Heritage Lighthouse and Heritage Railway Station programs show time spent waiting on required documentation or decisions from external parties (i.e., federal custodians, railway companies, or DFO) to be a key process delay. PCA cannot move forward on its evaluation or review related to any of these programs until appropriate documentation or approvals are received.
- **Process time for approval.** This is a common component in the administration of all OHP Designation programs and some OHP Conservation programs (e.g., Heritage Railways). Once the Agency has submitted recommendations or advice for approval, timing of decisions depends upon Ministerial priorities

#### FHBRO Exemptions

FHBRO has identified and compiled a list of certain building types, based on results of previous evaluations, that were determined to have minimal or no heritage value (e.g., sheds, picnic shelters, chicken coops). Exempt buildings are identified in MOUs with specific federal departments and agencies. While a minimum of information must still be submitted for each building to confirm that it is exempted, exempt buildings will not be subject to evaluation. These MOUs are designed to facilitate the timely evaluation of buildings and considerably reduce the resources required to complete the process.

We found that there are at least 3 MOUs currently in place. While these were updated since 2009, there is no regular process in place to trigger the development or monitor the ongoing relevance of each MOU. In addition, there are currently no MOUs in place between the FHBRO Office and the Agency’s Field Units, meaning that there are as yet no exemptions for Parks Canada structures.

<sup>76</sup> Days indicate time from when documents are received until final report is sent out to custodians.

In all programs evaluated, delays such as these resulted in an important difference between the total process time for an individual file and the effective time that PCA staff are engaged in work.<sup>77</sup> For example, while it has taken close to two years to complete evaluations of heritage lighthouses, staff estimate that the total time spent effectively working on any individual file after receipt of petition was no more than 4-6 weeks.<sup>78</sup> This difference is due to the iterative nature of the process for these programs where significant time may be spent waiting on actions or decisions from other parties.

We also found that the Agency has learned from its previous experiences and used these lessons to improve program efficiency. For example, the review structure for Heritage Lighthouse program is designed to be more nimble and responsive than similar programs. Rather than wait for the full HSMBC to convene for its bi-annual meeting, the program created a HSMBC Heritage Lighthouse Sub-Committee (composed of a sub-set of HSMBC members) to meet as required to provide advice on lighthouse designations. It has met 15 times from March 2011 to October 2014 to discuss close to 130 lighthouse (average of 8 per meeting). Most of these meetings have been by teleconference, making them both easier to schedule and more cost efficient than the HSMBC's usual in-person meetings. Such alterations were considered essential to allow the program to meet its legislated deadlines.

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<sup>77</sup> Based on program estimates of staff effort required per file.

<sup>78</sup> Staff estimates, for each lighthouse: 2-3 weeks to complete heritage evaluation; 1 week to prepare SOS based on HSMBC advice; and 1-2 weeks to prepare package for Minister.

## 5. CONCLUSION AND RECOMMENDATIONS

We concluded that the Other Heritage Places Designation and Conservation sub-programs are consistent with federal government priorities and the Parks Canada Agency's legislative and policy mandate. Further, there is a continued need for the sub-programs to address threats to the integrity of natural and cultural resources they are designed to protect. While specific survey data is lacking, there is also some evidence of Canadians' support for the programs by their participation in the nomination and conservation processes.

The evaluation found that designation activities are taking place consistent with the commitments made in the Agency's Performance Management Framework. The programs have developed systems to identify and, where relevant, prioritize nominated heritage places for designation. The programs are also completing or supporting the evaluation of nominated places; there was some level of system growth in all the programs during the period under evaluation.

In most cases, the nomination of other heritage places is not under the direct control of the Agency. Regardless, we found that the Agency is on track to meet its designation-related targets. Specifically:

- From 2009-20 to 2012-13, the Federal Heritage Buildings Program met its target to evaluate an average of 400 buildings per year (mostly as screenings and benchmarks). Meeting the revised target (to complete evaluation of 95% of federal buildings submitted within 6 months) may be a challenge. Our analysis of the data from 2009-10 to 2014-15 showed that only 70% of evaluations were meeting this target. While it may increase efficiency, we noted that 'batch' processing negatively skews the data.
- The Agency is progressing towards meeting its goals for heritage lighthouses. In discussion with DFO, the Agency is developing a strategy that will allow the Minister to consider all petitioned lighthouses by the legislated deadline of May 2015.
- There is evidence that Parks Canada met its target for WHS by providing advice and review on three active nominations.

The conservation role of the Agency in most Other Heritage Places programs is limited. From 2009-10 to 2014-15, the only conservation target for OHP was that "programs support the conservation of cultural resources at historic places administered by others". We found evidence that the Federal Heritage Buildings and Heritage Railway Stations Programs are completing reviews of proposed interventions to designated structures. The PM Grave Sites Program also assessed the condition of grave sites, identified conservation priorities and made some related investments in conservation work.

Further, we found that the Agency provides advice and support tools to proponents and custodians for designations and conservation. However, it is the owner of the designated place that is responsible to ensure that its heritage value is respected. As Parks Canada is not required to monitor the condition of sites it does not own or administer, there is no data on the overall state of heritage resources for Federal Heritage Buildings, Heritage Railway Stations or Heritage Lighthouses. While the Agency meets its reporting requirements for World Heritage Sites, its reporting on the state of Canadian Heritage Rivers is inconsistent.

The quality of financial data limits our ability to determine the efficiency of the sub-programs. However, it is evident that the programs operate with minimal human resources. Most OHP programs can also

demonstrate actions intended to increase efficiencies, e.g., by sharing resources within the Agency for research and report production and by combining similar sites to process as batches for designations. Process times to complete heritage designations or review proposed interventions vary depending on the program; they could take from a few months to several years. A number of management constraints affect program delivery.

### Recommendations

Sharing the heritage value of designated heritage places is an essential element of effective cultural resource management. The Directory of Federal Heritage Designations is intended to be a complete list of federal designations stemming from various programs. The lack of plaques or other markers to commemorate most sites designated under Other Heritage Places programs makes this an important public record and communication tool. However, we found some existing designations (e.g., heritage lighthouses) were not yet recorded in the Directory. The link between this Directory and other on-line references (e.g., Canadian Register of Historic Places) is also unclear. Given this, we recommend that:

**Recommendation 1:** The VP, Heritage Conservation and Commemoration update the Directory of Federal Heritage Designations to include all relevant federal designations and, using existing on-line references, clarify the role of this Directory in providing information to the public.

**Management Response:** Heritage Conservation and Commemoration Directorate will study the possibility of including all relevant federal designations into the Directory of Federal Heritage Designations. Wherever possible, designations will be added to the Directory and published. In some instances, we may require support from the Office of the Chief Information Officer (CIO) to make modifications to the Directory of Federal Heritage Designations in order to accommodate all federal heritage designations. Work to include the heritage lighthouses is now underway after the database was modified in 2013-15 to allow for their inclusion. All heritage lighthouses will be included in the Directory of Federal Heritage Designations. Target: 2017-18.

We found that Parks Canada has not consistently submitted annual reports for all designated Canadian Heritage Rivers under its administration as required by the program's Principles, Procedures and Operational Guidelines. As the *Parks Canada Agency Act* states that it is in the national interest for Parks Canada to "provide leadership and support to the Canadian Heritage Rivers System", we would expect the Agency to lead by example in this initiative. Given this, we recommend that:

**Recommendation 2:** The VP Heritage Conservation and Commemoration should work with relevant Field Units to ensure that annual reports are consistently produced as required for Canadian Heritage Rivers under Parks Canada's administration.

**Management Response:** Partially agree. Heritage Conservation and Commemoration Directorate will work with the Canadian Heritage Rivers Board to review monitoring and reporting requirements agreed to in the Canadian Heritage Rivers System Principles, Procedures and Operational Guidelines. Target: 2015-16.

Overall, our analysis of the efficiency of the Other Heritage Places sub-programs was limited by the availability or quality of databases used to track the processing of relevant files. In particular, the Federal Heritage Buildings Program provided the evaluation with six different data files used to track evaluations, none of which were subject to any quality controls. We found that the data contained

several errors and inconsistencies (e.g., missing data or incorrect dates). The relative size of this program (i.e., managing hundreds of files) makes it critically important that an adequate tracking system be in place. Given this, we recommend that:

**Recommendation 3:** The VP Heritage Conservation and Commemoration should review and implement mechanisms to enhance the integrity of data recorded in Federal Heritage Buildings Program databases. At minimum, to better track process times on files, databases should capture information relevant to each step in the program's evaluation and review process.

**Management Response:** Heritage Conservation and Commemoration Directorate will work with Registries staff to define and implement data integrity protocols to ensure that there are checks and balances in place for consistent and accurate data in the Federal Heritage Buildings Review Office (FHBRO) databases. These protocols will be communicated to all users and implemented with the use of tools such as guidelines and maintenance schedules. Target: 2016-17.

Further, we found that the Federal Heritage Buildings Program has not maximized the use of tools designed to increase the efficiency of the evaluation process. From 2009-10 to 2013-14, no screening or benchmark evaluations resulted in a building being designated as heritage, suggesting that there may be limited value-added by these levels of evaluation. Given this, we recommend that:

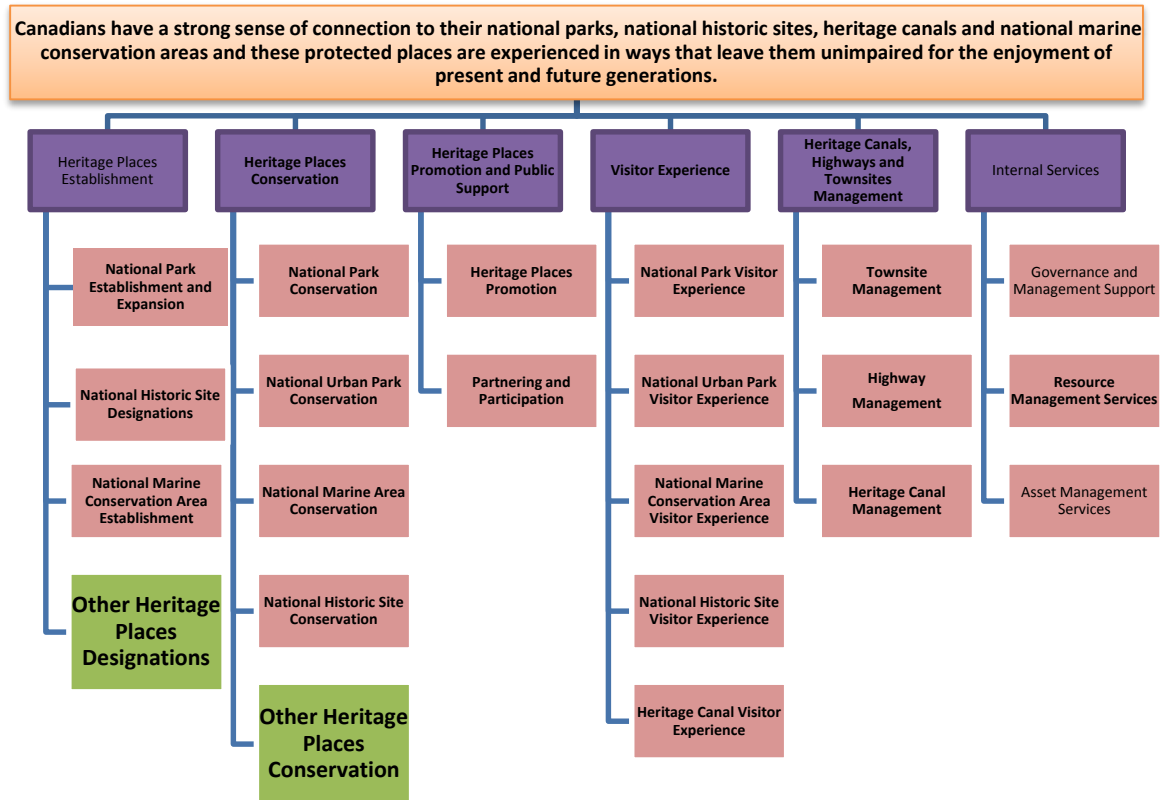
**Recommendation 4:** To increase efficiency, the VP Heritage Conservation and Commemoration should review and rationalize the need for and level of effort required to complete screening and benchmark evaluations of buildings nominated under the Federal Heritage Buildings Program. An assessment of the risks and benefits related to possible alternatives to or variations within the evaluation process (including more consistent and/or extensive use of exemptions) should be documented.

**Management Response:** The Federal Heritage Buildings Review Office (FHBRO) will review and analyze its processes to evaluate buildings using a risk management approach. Target: 2015-16.

Recommendations to improve and/or streamline processes will be formulated with a view to identifying those that could be exempted from the formal review process and gradually implemented. Target: 2016-17.

**APPENDIX A: STRATEGIC OUTCOME AND PROGRAM ALIGNMENT ARCHITECTURE**

Sub-programs covered by this evaluation appear as enlarged boxes (highlighted in green) in the following figure.



**APPENDIX B: DESIGNATED PLACES OWNED OR ADMINISTERED BY PARKS CANADA**

Data in the following table is valid as of October 2014. By definition, PCA does not own or administer any Heritage Railway Stations or PM Grave Sites. However, some are located within a national park or PCA-administered national historic site (e.g., Canadian Pacific Railway Station in Banff NP).

Program	Eligible/Nominated Heritage	Designated Heritage
<b>Federal Heritage Buildings</b>	Total federal inventory (40+ years): +26,000 eligible buildings Parks Canada inventory (40+ years): 4,310 buildings	Of 273 Classified FHB, PCA owns or administers: 130 Of 1058 Recognized FHB, Parks Canada owns or administers: 380
<b>Heritage Lighthouses (data as of October 2014)</b>	Of 327 petitioned lighthouses (with evaluation and/or decision pending), six are owned by PCA: <ol style="list-style-type: none"> <li>1. Bois Blanc Island Lighthouse and Blockhouse NHS</li> <li>2. Cape Spear Lighthouse NHS</li> <li>3. Flowerpot Island Lightstation (in Fathom Five NMCA)</li> <li>4. Pointe-au-Père Lighthouses NHS</li> <li>5. Portlock Point Lightstation (in Gulf Islands NPR)</li> <li>6. Prince Edward Point Lighthouse (in Prince Edward Point National Wildlife Area – land owned by PCA)</li> </ol>	Of 19 designated lighthouses, five are owned by PCA: <ol style="list-style-type: none"> <li>1. Active Pass Lightstation (in Gulf Islands NPR)</li> <li>2. East Point Lightstation (in Gulf Islands NPR)</li> <li>3. Figgard Lighthouse NHS</li> <li>4. Point Clark Lighthouse NHS</li> <li>5. Windmill Lighthouse (Battle of the Windmill NHS)</li> </ol>
<b>Canadian Heritage Rivers</b>	There are 16 priority rivers for CHRS; none are in PCA jurisdiction.	Of 38 designated heritage rivers, part or all of six are in PCA jurisdiction: <ol style="list-style-type: none"> <li>1. The Alsek River, in Kluane NP</li> <li>2. The Rideau Waterway, in Rideau Canal NHS</li> <li>3. The Athabasca River, in Jasper NP</li> <li>4. The Kicking Horse River, in Yoho NP</li> <li>5. The North Saskatchewan River, in Banff NP</li> <li>6. The South Nahanni River, in Nahanni NPR</li> </ol>
<b>World Heritage Sites</b>	Of seven sites on Canada's WHS Tentative List (2004), part or all of four are in PCA jurisdiction: <ol style="list-style-type: none"> <li>1. Gwaii Haanas</li> <li>2. Ivvavik / Vuntut / Herschel Island (Qikiqtaruk)</li> <li>3. The Klondike</li> <li>4. Quttinirpaaq</li> </ol>	Of 17 WHS in Canada, part or all of 12 are in PCA jurisdiction: <ol style="list-style-type: none"> <li>1. Kluane/Wrangell – St.Elias/Glacier Bay/Tatshenshini-Alsek</li> <li>2. SGang Gwaay</li> <li>3. Nahanni National Park Reserve</li> <li>4. L'Anse aux Meadows National Historic Site</li> <li>5. Wood Buffalo National Park</li> <li>6. Canadian Rocky Mountain Parks</li> <li>7. Historic District of Old Québec</li> <li>8. Gros Morne National Park</li> <li>9. Waterton-Glacier International Peace Park</li> <li>10. The Rideau Canal</li> <li>11. Landscape of Grand Pré</li> <li>12. Red Bay Basque Whaling Station</li> </ol>



**APPENDIX C: DESCRIPTION OF HERITAGE REGISTRIES**

The following is a description of the various directories, registries or listings used as communication tools by the OHP Designations sub-program.

**Directory of Federal Heritage Designations (DFHD)** – The Directory of Federal Heritage Designations is the main reporting tool for federal heritage designations. This Directory provides a complete list of federal designations stemming from various programs. It includes federal heritage buildings, heritage railway stations, and all national historic sites (people, places and events). The Register lists close to 3,500 designations. While it has recently been modified to accept related records, no designated Heritage Lighthouses are currently listed on the Register.

Link: [http://www.pc.gc.ca/apps/dfhd/default\\_eng.aspx](http://www.pc.gc.ca/apps/dfhd/default_eng.aspx)

**Canadian Register of Historic Places (CHRP)** – The Canadian Register is designed to provide a searchable single source of information about all historic places recognized for their heritage value at the local, provincial, territorial and national levels throughout Canada. Information is sent through this site to a public website ([historicplaces.ca](http://historicplaces.ca)). This Register is being developed as a joint federal-provincial-territorial initiative. It is still a work in progress – current listings represent only a fraction of the total number of Canada’s recognized historic places; new listings are added every week. However, it is not a database that receives original records. The Directory of Federal Heritage Designations is the root for all federal designations listed. Accordingly, designated Heritage Lighthouses are not currently recognized in this Register. Link: <http://www.historicplaces.ca/en/home-accueil.aspx>

**‘Directory’ of Designated Heritage Railway Stations** – While not an official directory, this list on the program’s website provides the name and location of most designated heritage railway stations. There are currently 160 railway stations listed. Link: <http://www.pc.gc.ca/clmhc-hsmbc/pat-her/gar-sta.aspx>

**Register of Government of Canada Heritage Buildings** – Listing of designated (i.e., recognized or classified) federal heritage buildings. This is not a public register and it is not used as a communications tool. In principle, the public can access records of all designated federal heritage buildings through the Directory of Federal Heritage Designations.

**APPENDIX D: EVALUATION MATRIX**

<b>A. RELEVANCE</b>				
<b>Core Question</b>	<b>Specific Questions</b>	<b>Expectations</b>	<b>Indicators</b>	<b>Data Sources/ Methods</b>
1. To what extent is there a continued need for the sub-programs?	<ul style="list-style-type: none"> <li>To what extent is there a continued need for OHP designations and conservation?</li> <li>To what extent are the sub-programs responsive to the needs of Canadians?</li> </ul>	<ul style="list-style-type: none"> <li>There is a need to designate and conserve natural and cultural heritage resources outside the Agency’s major systems.</li> <li>Canadians support the conservation of Canada’s natural and cultural heritage.</li> <li>Where relevant, Canadians are engaged in the process for OHP designations.</li> </ul>	<ul style="list-style-type: none"> <li>Gap filled by program (e.g., program rationale).</li> <li>Canadians’ support for heritage conservation.</li> <li>Nominations for designations submitted by the public.</li> </ul>	<ul style="list-style-type: none"> <li>Document review.</li> </ul>
2. To what extent are the sub-programs aligned with government priorities?	<ul style="list-style-type: none"> <li>To what are the sub-programs aligned with federal government priorities?</li> </ul>	<ul style="list-style-type: none"> <li>Sub-program objectives align with Government of Canada priorities.</li> </ul>	<ul style="list-style-type: none"> <li>Degree to which sub-programs align with GOC Whole of Government Framework.</li> </ul>	<ul style="list-style-type: none"> <li>Document review.</li> </ul>
3. To what extent are the sub-programs aligned with federal roles and responsibilities?	<ul style="list-style-type: none"> <li>To what extent are the sub-programs aligned with PCA roles and responsibilities?</li> </ul>	<ul style="list-style-type: none"> <li>The sub-programs are clearly aligned with PCA’s legislative and policy mandate.</li> </ul>	<ul style="list-style-type: none"> <li>Federal legislation, policies and directives indicate relevant roles and responsibilities.</li> <li>PCA mandate, policies and directives indicate relevant roles and responsibilities.</li> </ul>	<ul style="list-style-type: none"> <li>Document review.</li> </ul>

B. PERFORMANCE				
Core Question	Specific Questions	Expectations	Indicators	Data Sources/ Methods
4. To what extent are activities taking place and expected outputs being produced?	<ul style="list-style-type: none"> <li>To what extent are activities taking place and expected outputs being produced?</li> </ul>	<ul style="list-style-type: none"> <li>Key outputs are planned and produced consistent with commitments.</li> </ul>	<p>Designation</p> <ul style="list-style-type: none"> <li>Evaluations completed</li> <li>Advice and review for WHS and CHRS</li> <li>Directories of designated heritage places</li> <li>PM Grave Sites commemorated</li> </ul> <p>Conservation</p> <ul style="list-style-type: none"> <li>Reviews of proposed alterations, transfers, sales and disposals</li> <li>Conservation/maintenance plans</li> <li>Monitoring reports</li> </ul>	<ul style="list-style-type: none"> <li>Document and file review.</li> <li>Database analysis.</li> <li>Key informant interviews.</li> </ul>
5. To what extent is there progress towards expected outcomes for OHP Designations and Conservation?	<ul style="list-style-type: none"> <li>To what extent are targets and results being achieved?</li> </ul>	<ul style="list-style-type: none"> <li>Parks Canada programs support the designation of other heritage places:                             <ul style="list-style-type: none"> <li>On average over 3 years, evaluate 400 federal buildings per year to identify buildings that have historic value.</li> <li>Complete 95% of evaluations for federal buildings submitted to Parks Canada by March 2015.</li> <li>Review 100% of the lighthouses nominated for Heritage Lighthouse designation by May 2015.</li> <li>Provide advice and review of 3 nominations for Canadian World Heritage Sites by March 2015.</li> <li>Establish a comprehensive system of Canadian heritage Rivers by 2018.</li> </ul> </li> </ul>	<p>Designation</p> <ul style="list-style-type: none"> <li>Trend in system growth.</li> <li>Progress against corporate targets.</li> </ul>	<ul style="list-style-type: none"> <li>Document and file review.</li> <li>Key informant interviews.</li> </ul>

	<ul style="list-style-type: none"> <li>Does PCA provide effective support to applicants/proponents and owners/custodians of other heritage places?</li> <li>Does PCA effectively ensure the conservation of Prime Ministers gravesites?</li> </ul>	<ul style="list-style-type: none"> <li>Parks Canada programs support the conservation of other heritage places.</li> <li>In cooperation with interested parties, PCA effectively ensures the conservation of Prime Ministers' gravesites.</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder perspectives on effectiveness of conservation tools.</li> <li>Evidence of improved condition of PM Grave Sites.</li> </ul>	
C. EFFICIENCY AND ECONOMY				
Core Question	Specific Questions	Expectations	Indicators	Data Sources/Methods
6. To what extent are the sub-programs efficient and economical?	<ul style="list-style-type: none"> <li>How do costs/timing compare among outputs?</li> <li>What management flexibilities/constraints influence the sub-programs' efficiency/economy?</li> </ul>	<ul style="list-style-type: none"> <li>Costs of producing outputs are known and verified.</li> <li>Designation and conservation activities are delivered at the least cost to the Agency.</li> <li>Staff time is efficiently allocated among the Other Heritage Places programs.</li> </ul>	<ul style="list-style-type: none"> <li>Cost to produce a given level of output.</li> <li>Cost of inputs for a given level of result.</li> <li>Estimates of staff time.</li> <li>Time to complete process compared to service standard/notional timeline.</li> <li>Extent management has used available flexibilities to encourage efficient or economical operations.</li> </ul>	<ul style="list-style-type: none"> <li>Database analysis (i.e., STAR).</li> <li>Document review.</li> <li>Key informant interviews.</li> <li>Comparative analysis.</li> </ul>

**APPENDIX E: KEY DOCUMENTS CONSULTED****General**

- Canada National Parks Act (2001)
- Historic Sites and Monuments Act (2013)
- Parks Canada Agency Act (1998)
- PCA. Standards and Guidelines for the Conservation of Historic Places in Canada (2010)
- PCA. State of Canada's Natural and Historic Places (2011)
- PCA. 2012-2013 Report on Heritage Designations
- TBS. Policy on Evaluation (2009) and related directives
- TBS. Whole of Government Framework (2012)
- The Past Collective. Canadians and Their Past (2013)

**Federal Heritage Buildings Program**

- PCA. A Guide to Working with the Federal Heritage Buildings Review Office (2009)
- PCA. FHBRO Code of Practice (1996)
- OAG. The Conservation of Federal Built Heritage (February 2007, Chapter 2)
- TBS. Policy on the Management of Real Property (2006)

**Heritage Lighthouses Program**

- Heritage Lighthouses Protection Act (2008)
- DFO. Guide to Preparing a Business Plan for Acquiring a Surplus Lighthouse
- DFO. FAQ – Heritage Lighthouses Protection Act – Post Petition Period
- PCA and HSMBC. Heritage Lighthouse Designation Criteria
- Senate of Canada. Report on the implementation of the Heritage Lighthouse Protection Act. (October 2011)

**Heritage Railway Stations Program**

- Heritage Railway Stations Protection Act (1990)
- PCA. Activity Policy - Canadian Heritage Railway Stations Policy (1994)

**PM Grave Sites Program**

- PCA. Brochure on the Grave Sites of Former Prime Ministers.
- PCA. Conservation Maintenance Plan for Grave Site of Prime Minister (multiple reports, 2000-01)
- PCA. Grave Sites of Canadian Prime Ministers: Monitoring Report (multiple reports; 2011-12)
- PCA. Grave Sites of Canadian Prime Ministers: 2011-16 Conservation Priorities (2012)

**Canadian Heritage Rivers Program**

- PCA. Activity Policy - Canadian Heritage Rivers Policy (1994)
- CHRS. Building a Comprehensive and Representative Canadian Heritage Rivers System: Final Technical Report (2010)
- CHRS. Canadian Heritage Rivers Charter (2013)
- CHRS. CHRS Annual Report, 2010-11
- CHRS. CHRS Strategic Plan 2008-2018
- CHRS. Strategic Communication Plan 2013-2016 (2013)
- CHRS. Your River Heritage Future: A Guide to Establishing a Canadian Heritage River

- Finkelstein, Max. Honouring Our Rivers: An Overview of the Canadian Heritage Rivers System (CHRS) and a detailed look at the CHRS process.

**World Heritage Sites Program**

- PCA. Canada's Tentative List for World Heritage Sites (2004)
- PCA. Periodic Report on the Application of the World Heritage Convention (2006)
- PCA. UNESCO World Heritage Site Nominations in Canada: A guidance manual for practitioners (2009)
- UNESCO World Heritage Convention (1972)
- UNESCO. Operational Guidelines for the Implementation of the World Heritage Convention (2012)
- UNESCO. Preparing World Heritage Nominations Second Edition (2011)

## APPENDIX F: CHRS PRIORITY RIVERS

## Priority Rivers Identified by CHRS Gap Analysis

Province/Territory	Rivers
British Columbia	Columbia River
British Columbia and Alberta	Peace River
Alberta	Milk River, St. Mary River, Athabasca River <sup>79</sup>
Alberta and Saskatchewan	Battle River, South Saskatchewan River
Saskatchewan	Frenchman River, Qu'Appelle River, Souris River, Pembina River
Ontario	St. Lawrence River <sup>80</sup>
Yukon	Yukon River
North West Territories	MacKenzie River
NWT and Alberta	Slave River, Hay River

<sup>79</sup> Part of the Athabasca River was designated in 1989.

<sup>80</sup> St. Lawrence River nomination document was submitted to CHRB in 2011. Supplementary work was requested which has not yet been completed by the proponent.

**APPENDIX G: FINANCIAL DATA**

The following is a summary of financial data as provided in the Agency's financial system (STAR). Notes required to interpret the data in the tables are provided below and as relevant in the main report text.

**OHP Expenditures by Category, 2009-10 to 2013-14**

Category	Expenditures by Fiscal Year (\$)												Grand Total
	OHP Designations (1031)					Design. Total	OHP Conservation (2072)					Cons. Total	
	2009-10	2010-11	2011-12	2012-13	2013-14		2009-10	2010-11	2011-12	2012-13	2013-14		
<b>O&amp;M<sup>a</sup></b>	1,079,262	1,003,109	829,403	803,048	206,821	3,921,643	1,089,142	310,442	1,123,363	824,982	827,738	4,175,667	8,097,310
<b>Salary</b>	604,068	519,892	258,724	360,542	299,536	2,042,762	3,321,070	2,854,751	1,733,619	1,652,093	1,797,651	11,359,184	13,401,946
<b>G&amp;C<sup>b</sup></b>	0	23,000	0	0	100	23,100	0	0 <sup>c</sup>	0	46,000	46,500	92,500	115,600
<b>Other<sup>d</sup></b>	55,423	71,095	-55,640	-1,066	336	70,148	-293,086	-242,484	-24,013	146	-25,861	-585,298	-515,150
<b>Total</b>	<b>1,738,753</b>	<b>1,617,096</b>	<b>1,032,487</b>	<b>1,162,524</b>	<b>506,793</b>	<b>6,057,653</b>	<b>4,117,126</b>	<b>2,957,259</b>	<b>2,832,969</b>	<b>2,523,221</b>	<b>2,646,028</b>	<b>15,042,053</b>	<b>21,099,706</b>

## Notes:

a – Expenditures for OHP Designations include membership fees to various international programs (approx. \$600-700K per year).

b – Excludes \$22,700 annual grant for International Peace Garden (Manitoba). From 2009-10 to 2011-12, coded to OHP Designation. From 2012-13 to 2013-14, coded to OHP Conservation.

c – Excludes \$34.5K contribution to a heritage project in the Town of Lunenburg, NS (could not be linked to any specific OHP program).

d – Negative values from 2009-10 and 2010-11 attributed to asset depreciation. Negative values from 2011-12 to 2013-14 attributed to revenue.

Source: PCA Financial System (STAR)



## OHP Expenditures by Fund Centre, 2009-10 to 2013-14

Fund Centre	Expenditures by Fiscal Year (\$)ª											Grand Total	
	OHP Designations (1031)					Design. Total	OHP Conservation (2072)						Cons. Total
	2009-10	2010-11	2011-12	2012-13	2013-14		2009-10	2010-11	2011-12	2012-13	2013-14		
Field Units	155,263	120,467	27,415	20,856	14,322	338,323	513,666	182,044 <sup>b</sup>	142,317	117,801	28,332	984,160	1,322,483
HCC Directorate <sup>c</sup>	1,172,397	1,139,161	844,033	981,792	316,632	4,454,015	2,354,774	1,490,998	2,196,302	1,943,947	1,903,656	9,889,677	14,343,692
PAEC Directorate	130,644	116,734	97,271	64,975	32,567	442,191	378,547	348,204	169,293	142,825	155,044	1,193,913	1,636,104
Other	31,708	26,677	26,751	36,387	1,076	122,599	-135,486 <sup>d</sup>	98,836	23,322	51,025	20,013	57,710	180,309
Treasury	248,741	214,057	37,017	58,514	142,194	700,523	1,005,624	802,677	301,736	267,624	538,984	2,916,645	3,617,168
<b>TOTAL</b>	<b>1,738,753</b>	<b>1,617,096</b>	<b>1,032,487</b>	<b>1,162,524</b>	<b>506,791</b>	<b>6,057,651</b>	<b>4,117,125</b>	<b>2,957,259</b>	<b>2,832,970</b>	<b>2,523,222</b>	<b>2,646,029</b>	<b>15,042,105</b>	<b>21,099,756</b>

## Notes:

a – Excludes \$22,700 expenditure for International Peace Garden. For 2009-10 to 2010-11, coded to OHP Designation by Manitoba FU. For 2011-12, coded to OHP Designation by Heritage Conservation Branch. For 2012-13 and 2013-14, coded to OHP Conservation by Heritage Conservation Branch.

b – Excludes \$34.5K contribution to a heritage project in the Town of Lunenburg, NS (could not be linked to any specific OHP program).

c – Expenditures for OHP Designations include membership fees to various international programs (approx. \$600-700K per year).

d - Negative value attributed to asset depreciation.

Source: PCA Financial System (STAR)