

# Protecting Historical Heritage: The Commemorative Integrity Evaluation Program at Parks Canada's National Historic Sites

*Patricia E. Kell*

## Introduction

A FIRE RIPS THROUGH A HISTORIC BUILDING. Archaeological remains wash away with the erosion of the shore. Precious artifacts are stolen from a site. Such events force us to confront the loss of historic value from historic sites. But as an ongoing activity in good management, the state of our sites needs to be measured and, when there are deficiencies, corrective actions should be taken. Parks Canada's commemorative integrity evaluation program was designed to respond to this need—so that the agency would know what condition its most valuable cultural resources were in, could share this information with the public, and use it to focus corrective action.

Parks Canada manages the National Program of Historical Commemoration, which has seen the designation of over 950 national historic sites across the country, as well as the commemoration of persons and events of national historic significance. Canada's national historic sites are owned by not-for-profit organisations, by provincial and municipal governments, by corporations and private citizens; and over a fifth are owned by the federal government. The Parks Canada Agency administers 167 national historic sites, with a mandate to protect and present these nationally significant examples of Canada's cultural heritage and foster public understanding, appreciation, and enjoyment in ways that ensure their commemorative integrity for present and future generations.<sup>1</sup>

The concept of commemorative integrity is enshrined in the Parks Canada Agency Act. It refers to the health and wholeness of a national historic site. It reflects the condition or state of a site when the site retains the heritage value for which it was designated. The reasons why a place is of national significance (also sometimes called the reasons for designation or commemorative intent) and the limits of the place (also known as the designated place) are identified in the designation.

---

*The George Wright Forum*, vol. 30, no. 3, pp. 280–286 (2013).

© 2013 The George Wright Society. All rights reserved.

(No copyright is claimed for previously published material reprinted herein.)

ISSN 0732-4715. Please direct all permissions requests to [info@georgewright.org](mailto:info@georgewright.org).

The definition of commemorative integrity includes three elements.<sup>2</sup> To be in a state of commemorative integrity:

- The resources directly related to the reasons for designation as a national historic site must not be impaired or under threat;
- The reasons for designation must be effectively communicated to the public; and
- The site's other heritage values must be respected in all decisions and actions affecting the site.

### **Purpose of commemorative integrity evaluations**

In 1994, Parks Canada adopted a cultural resource management policy.<sup>3</sup> This policy marked a departure in the way the agency managed cultural resources, going from an approach which was materials-focused to a values-based system. In order for this to function in practice, it became necessary to define where value lies at each site. The documents used for this are called commemorative integrity statements. For each site, the commemorative integrity statement constitutes an analysis of the resources at the site against the reasons for designation—the nationally significant values—and other historic or heritage values. In addition, a section of the document articulates heritage messages that should be communicated, including the reasons for designation, context messages around those reasons, and messages related to other heritage values.

Beginning in 1990, Parks Canada also embarked on the production of “state of the parks” reports. The objective was to share with Canadians not only performance against core government accountabilities but performance against the mandate to protect natural and cultural resources. The concept of “state of” reporting pushed Parks Canada to develop a means to quantify and report systematically on the condition of national historic sites. By the turn of the century, four reports had been produced and it was clear that a more consistent and sustainable approach to generating and reporting information was required. The commemorative integrity evaluations program was the response.<sup>4</sup>

The goal of the program was to produce consistent, reliable, and comprehensive information about the state of the 167 national historic sites administered by Parks Canada. This information would then be reported in the state of the parks reports, and over time has also become central to performance management in the departmental performance report.<sup>5</sup> The evaluations have made it possible to express the state of conservation of the national historic sites individually and as a group, as well as of individual resources and management practices within the sites.

### **Methodology**

The design of the commemorative integrity evaluations drew directly from the definition of commemorative integrity, the format of commemorative integrity statements, and the contents of the 1994 cultural resource management policy.<sup>6</sup> The result was a questionnaire in three sections, paralleling the three parts of the definition of commemorative integrity.

The first part of the evaluation looked at the condition of each resource at a national historic site. The list of resources was taken from the commemorative integrity statement. Analysis of condition was based not only on a resource-type based definition of good, fair and

poor, but also on the historic values that were associated with each resource. For example, ruins could receive a good rating, providing that the ruinous state was a value of the place. To the extent possible, information was culled from existing records of condition, for example through the asset management system or the collections management database.

The second section considered whether the reasons for designation and other messages identified in the commemorative integrity statement are effectively communicated. The criteria considered the presence and prominence of messaging, the media used, and other qualities related to communications that were required in the policy; for example, that where there are multiple interpretations of a historical event, a range of perspectives will be presented. Periodic visitor surveys provided critical information on the effectiveness of the communications efforts.

The third section of the commemorative integrity evaluations looked at whether the management practices required in policy were being followed at the site. These practices included inventorying the cultural resources and evaluating them to determine their historic value; evaluating impacts of proposed activities and, when appropriate, influencing the activities of others, for example in leases and licenses; determining whether records are kept up-to-date; and determining whether monitoring and corrective measures are undertaken.











In each of the three sections of the evaluation, ratings were given based on a good–fair–poor system, with associated definitions for each kind of question. These ratings were rolled up into overall ratings in each component using a red–yellow–green system. The overall commemorative integrity for a site could be expressed either as a triad of colors (e.g., green–green–green, where the three colors relate to condition of the resources, effectiveness of communications, and selected management practices, respectively). The triad of colors could also be converted to a numerical score from one to ten (Figure 1). These numerical scores were then averaged in order to express the overall state of health of the system of national historic sites. A corporate goal was established in 2008 to raise this overall numerical index from 6.0 to 6.6 by 2013.

In 2001, a ten-year schedule of evaluations was established covering all national historic sites administered by Parks Canada. The evaluations were typically carried out over a two-day period, at the site, with participation from site staff, professional staff familiar with the site (for example, archaeologists and historians), and three staff from elsewhere in the organization who could bring objectivity and national consistency to the ratings. In some cases, external partners and stakeholders were also invited to participate in the evaluations.

### **Successes of the program**

As noted above, the goals of the program were two-fold: to better understand the state of commemorative integrity at Parks Canada’s national historic sites and, based on that understanding, to improve it. In terms of these goals, the program has been highly successful. Parks Canada achieved its goal of improving the overall state of commemorative integrity from an average of 6.1 to 6.7, ahead of schedule (Figure 2).

Many issues identified through the red rating system—particularly conservation issues—were addressed. “Is it red?” became a shorthand to describe things which were importantly in need of attention. At Inverarden House, the evaluation focused attention on the problem

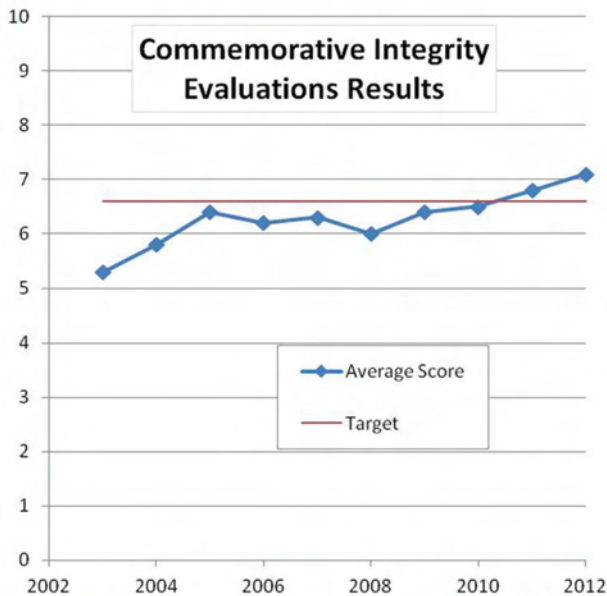
Score	State of Commemorative Integrity
10 	No Impairment
9 	Minor Impairment
8 	
7 	
6 	Significant Impairment
5 	
4 	
3 	Major Impairment
2 	
1 	Severe Impairment

**Figure 1.** Results from the evaluation of the condition of resources, effectiveness of communications, and management practices expressed as a numerical score from one to ten.

with mold, which was removed and ventilation was improved. At Twin Falls Tea House, the evaluation supported improvements to the building foundation. At Jasper House, a remote archaeological site, the evaluation encouraged improved access to the site and views of the site. At Prince of Wales Tower, the results on the effectiveness of communications front supported better messaging at the site.

The commemorative integrity evaluations program also generated more systematic and better data about our national historic sites than had existed previously. While site staff have always had a strong understanding of what they were managing, access to consistent information about resources and practices across the system was more difficult. The evaluations have made it easier to look at issues from a broad perspective rather than on a site-by-site basis.

Though not particularly designed with continuing education in mind, the evaluations became an important means of sharing best practices in cultural resource management. The cultural resource management policy set fairly clear direction on what was expected of managers and when it was adopted enjoyed a relatively vigorous training program. By the time the evaluations were taking place, in part because of staff changes, the level of awareness about



**Figure 2.** By focusing on results, Parks Canada achieved its goal of improving the overall state of commemorative integrity.

the requirements of the policy was not universally high. The evaluations—especially the third component on selected management practices—proved a useful catalyst to look at what was expected and to reflect on how it could be best implemented in the operational realities of any particular site.

The commemorative integrity evaluations were one of the few activities that allowed staff from many parts of the organization to work together on a shared project. There were opportunities for sharing of information and perspectives from site to site across the agency and for the transmission of knowledge and experience from older staff to those in an earlier phase of professional growth. The positive working relationships that were fostered through these experiences continue to pay dividends today.

### Moving forward

While the commemorative integrity evaluations have served the agency well, all such programs deserve to be revisited periodically. The cycle of original evaluations has come to an end and the corporate goal articulated for 2013 has been achieved. There is no doubt that the evaluations set a new standard in terms of systematically and consistently looking at cultural resources, messaging, and management practices across the agency. Notwithstanding these considerable strengths, there have been some weaknesses and as we consider now what will come next, it is important to take stock of these, as well.

Ten years of experience with the evaluation methodology have brought to light some areas where the data could be improved. For example, in the original design there was no

clear or consistent distinction between condition, *per se*, and the condition of historic value. While in general terms the methodology could fully credit a ruin as being in good condition, it has not been able to reflect the distinction between a building that is structurally stable with its original system intact and one that is stable because its original structural system has been unsympathetically replaced with a steel skeleton. The condition of heritage value and the condition of an asset need to be more clearly distinguished.

Similarly, the methodology did not include a metric to express permanent loss of heritage value. The national historic sites program has a process to de-designate or re-list sites that have permanently lost their commemorative integrity, but the evaluations arguably should be able to reflect incremental steps towards that terminus. In other words, the program can accommodate catastrophic loss of commemorative integrity but the evaluations do not reflect cumulative impacts.

A final methodological challenge emerged because the evaluations paid attention to every resource and rated each individually, and then rolled up those results into overall results. The results were not formally “averaged” but the consequence of a process which attempted to simultaneously reflect both the good and the poor was that all results tended to the middle. Both extreme excellence and real problems were sometimes masked in a pervading cloud of middling yellow.

In December 2012, a renewed cultural resource management policy<sup>7</sup> was approved. This exciting development addresses some fundamental shifts in the way we need to manage pressures on cultural resources and the agency in the 21<sup>st</sup> century. It sets out a new practice for cultural resource management, one that is more focused on those resources which are most closely linked to the national significance of the places we manage, more sensitive to the need to set priorities, and more open to a respectful but not exhaustive approach to meeting our conservation goals. It also places a premium on the relationship between resources and how they are shared with Canadians. In comparison with these currents, the commemorative integrity evaluations program tried to do too much—to evaluate all resources, regardless of their degree of value, to include all messages and contextual messages, and to take on all the direction on practices and activities from the 1994 policy. Our challenge will be to hone in on what is most salient for making the critical conservation decisions of the future.

Finally, when we look outside our own borders, the dialogue around integrity taking place with respect to World Heritage provides some fresh inspiration. In the *Operational Guidelines for the Implementation of the World Heritage Convention*,<sup>8</sup> integrity is defined as a measure of the wholeness and intactness of the cultural heritage and its attributes (s. 88). In order to be considered for designation, the property and/or its significant attributes should be in good condition, and the impact of deterioration processes controlled. Notions of “significant proportion” and “relations and dynamic functions” (s. 89) push us to think about thresholds and systems in a way that the old evaluations paradigm did not accommodate.

## Conclusion

Since 2001, Parks Canada has undertaken a systematic campaign to measure, consolidate, share, and improve management of the state of commemorative integrity of our national historic sites. For those who have been involved, it has often been an enriching opportunity to

come to know these sites more intimately and to appreciate their value more fully. It has been a gift to work with colleagues from across the country, across functions, and across languages and professional fields, all committed to protecting and presenting these magnificent historical treasures for Canadians.

When asked what the legacy of the commemorative integrity evaluations program is, my colleagues cite its importance in putting cultural resources at the center of a structured discussion involving a range of points of view. They acknowledge its importance in bringing together a wealth of information about our national historic sites in ways that could be accessed and compared. They value its utility in bringing forward issues and trends that required further attention, and in spurring conservation action.

As we look now towards the next generation of commemorative integrity evaluations, we will build on these many strengths, while positioning a renewed approach to evaluating commemorative integrity within the current economic and social realities.

### Endnotes

1. Parks Canada Agency, *Report on Plans and Priorities 2013–14* (Ottawa: Parks Canada Agency, 2013).
2. Parks Canada Agency, *Guide to the Preparation of Commemorative Integrity Statements* (Ottawa: Parks Canada Agency, 2002).
3. Department of Canadian Heritage, *Parks Canada Guiding Principles and Operational Policies* (Ottawa: Minister of Supply and Services Canada, 1994) 99–115.
4. Canadian Parks Service, *State of the Parks 1990 Report* (Ottawa: Minister of the Environment, 1990); Parks Canada, *State of the Parks, 1994 Report* (Ottawa: Minister of the Department of Canadian Heritage, 1994); Parks Canada, *State of the Parks 1997 Report* (Ottawa: Department of Canadian Heritage, 1998); Parks Canada Agency, *State of Protected Heritage Areas 1999 Report* (Ottawa: Parks Canada Agency, 2000).
5. See for example, Parks Canada Agency, *Performance Report for the Period Ending March 31, 2008* (Ottawa: Parks Canada Agency, 2008) 41–44.
6. See references 2 and 3 above.
7. See [www.pc.gc.ca/eng/docs/pc/poli/grc-crm/index.aspx](http://www.pc.gc.ca/eng/docs/pc/poli/grc-crm/index.aspx).
8. United Nations Educational, Scientific and Cultural Organisation, Intergovernmental Committee for the Protection of the World Cultural and Natural Heritage, *Operational Guidelines for the Implementation of the World Heritage Convention* (Paris: UNESCO World Heritage Centre, 2012).

**Patricia E. Kell**, Heritage Conservation Branch, Parks Canada, 25 Eddy Street (25-5-P), Gatineau, QC K1A 0M5 Canada; [patricia.kell@pc.gc.ca](mailto:patricia.kell@pc.gc.ca)