



May 14<sup>th</sup>, 2015

Mr. Blair Parody  
Superintendant  
Cape Breton Field Unit  
Parks Canada Agency  
259 Park Service Road  
Louisbourg, Nova Scotia  
B1C 2L2

Dear Mr. Purdy,

It has come to the attention of the Canadian Archaeological Association that Parks Canada is constructing a staff parking lot on the site of the Fortress of Louisbourg, Cape Breton Island, Nova Scotia. As you know, the Fortress was designated a National Historic Site of Canada (NHSC) in 1920, which represents one of the earliest such designations in the country. The heritage value of the Fortress of Louisbourg is immense and unanimously recognised by archaeologists, historians, curators, heritage managers, and politicians, as well as Canadian citizens of diverse ancestry.

The Parks Canada Agency was created to ensure the protection of the national historic sites it administers. Here, protection is not simply a goal: it is the agency's main responsibility. The *Management Plan* established for the Fortress of Louisbourg in 2011 stipulates that priority actions should include "Working with partners, focus on protecting cultural resources, facilitating opportunities for visitor experience, and fostering public awareness and understanding." (p. 28, emphasis mine).

It appears that the agency has recently failed in its duty to ensure the protection of the Fortress of Louisbourg. Following on the concerns raised by the construction of the North Shore trail in 2013, the building of a new parking lot directly on the grounds of this invaluable historical site is highly worrying. What archaeological mitigation was undertaken to ensure heritage preservation and management? The same management plan cited above reminds us that:

*"Approximately 75% of the Fortress, outer works and town-site have not been reconstructed and most of the in-situ archaeology has not yet been studied. The remarkable density of structural and artifact materials preserved within the Louisbourg site provides Canadians with an unparalleled "time capsule" of 18<sup>th</sup> century life", and that "[...] lesser explored areas provide the Site with many opportunities to diversify programming and services." (p. 33).*

Other actions fostered by the management plan consist in "Develop[ing] a research plan to study the in-situ townsite area, including archaeological inventory", and in "Examin[ing] field schools and public archaeology options for additional educational and visitor experience opportunities" (p. 34), as well as to "Complete an inventory of archaeological sites". This is in accordance with the statement that "Level 1, *in-situ* archaeological resources are protected and presented in ways that respect the principles and practices of the Cultural Resources Management Policy" (p. 35). The management plan also indicates that "As Parks Canada continues to apply best practices in asset management to the period structures and associated infrastructure, *the emphasis will be placed on effective maintenance to safeguard cultural resources, buildings and structures.*" (p. 37, emphasis mine). Did you consider those important priority actions, principles, and practices identified in your own

management plan and policies in your planning for the new parking lot? In an interview to the Canadian Broadcasting Corporation released on May 17<sup>th</sup>, you stated that the new parking lot is a "necessity", and that it "[...] will accommodate the move of administration offices onto the site". Why is this given priority over the protection of the archaeological resources of this historical site of national importance?

The Fortress of Louisbourg management plan insists on the necessity to create opportunities for *authentic* and *engaging* visitor experiences, and to facilitate a sense of connection with the site's heritage and history. How can this be achieved with the building of a parking lot on site, and the constant and visible presence of modern cars and administration staff that it will entail? Have you considered the idea of a shuttle bus, for example? In the same interview mentioned above, you do acknowledge the problem, stating that "There's no doubt that the presence of a modern-day vehicle at a reconstructed 300-year-old site will probably stand out", but you do not mention any measure that could be envisioned to mitigate such negative effect on the visitor's experience.

Finally, the management plan also indicates that "Parks Canada engages its many stakeholders and partners and encourages shared leadership through active participation in the development and implementation of the future direction for the Sites", and that it should "Strengthen relationships with partners by actively engaging in joint initiatives, sitting on common boards and committees, and consulting each other during planning processes" (p. 29). In planning of the new parking lot, what partners and stakeholders were consulted and what were their reactions?

We believe that the Canadian Archaeological Association, the largest national association of professional archaeologists with over 600 members, should be considered as an important stakeholder and partner of the Parks Canada Agency, in this dossier as in many others. As such, we expect the agency to take serious consideration of the deep concern of our association towards the rearrangement of the parking installations on the NHSC of the Fortress of Louisbourg. As the new installations are not planned to be in use before 2016, there should be enough time to reconsider the present planning in order to ensure the full protection of the archaeological resources of the site, thus allowing the Agency to respect its protection duties towards this national historical site, and to apply the management objectives and principles to which it adheres.

Yours sincerely,



Christian Gates St-Pierre  
Archaeologist, PhD  
President of the Public Advocacy Committee  
Canadian Archaeological Association  
publicadvocacy@canadianarchaeology.com

cc:

Alan Latourelle, Chief Executive Officer, Parks Canada Agency  
Leona Aglukkak, Minister of the Environment  
Shelly Glover, Minister of Canadian Heritage and Official Languages  
Rodger Cuzner, Member of Parliament for Cape Breton-Canso  
Tony Ince, Minister of Communities, Culture and Heritage, Nova Scotia Legislature  
Brittany Houghton, President, Nova Scotia Archaeology Society  
Lisa Rankin, President, Canadian Archaeological Association