

Retired Parks Canada Historian (Responds to the Detailed Impact Analysis (DIA): the Never Forgotten Memorial, Cape Breton Highlands National Park Monument,

7 June 2015

Brief Background

I am a retired historian from Parks Canada with 35 years' service in Cape Breton. I am a native of Ingonish and still live there for much of the year. I have published widely on the social and cultural history of Cape Breton, including Ingonish and Green Cove. (For almost half of my 70 historical publications, see the link below my signature block.) I have also interviewed approximately 200 people on audio tape from the Ingonish area over the past 40 years. Many of these people lived and worked at Green Cove including my great grand aunt, Annie Belle (Donovan) Gillis, 1874-1980. The typed transcript of her interview is 18 legal-size pages and available as a PDF.

Critique: the Detailed Impact Analysis.

Green Cove is a unique site

The Detailed Impact Analysis is not detailed. Rather, it is a document full of half-truths and misleading statements. The best part of the document are the engineering specifications for the construction of the monument, hardly surprising since Stantec is the both design engineer for the monument and did the environmental assessment. This is clearly a conflict of interest.

The DIA states that “the residual effects of the project on the environment are generally predicted to be negligible to moderate in magnitude....” (DIA, p. vii) Dr. Sandra Barr, one of Canada’s most accomplished geologists, strongly disagrees. Barr has authored more than 200 scientific publications, many focused on Nova Scotia rocks. Moreover, she has taken her class on field trips to Green Cove over the past 35 years.

At a meeting in Sydney, N.S. on 2 June 2015 Dr. Barr stated that 25 percent of Green Cove will be destroyed outright by the construction of the monument. The rest of the headland will be inaccessible due to the size of the base for the monument and the accompanying infrastructure. Green Cove has a granite outcropping known as the Black Brook Granite suite that extends for 26,000 hectares within the northern part of the park . The iconic pink granite is only one part of a complex intrusion at Green Cove. The site is remarkable because it is one of the few places that are accessible for public viewing, due to the wave-washed surface of the outcrop that reveals many details of colour and texture. According to Dr Barr- and this is a key point- the granite outcropping is inaccessible because it is covered by soil and dense vegetation. According to Dr Barr, Green Cove is unique and therefore it is one of the few proposed geo heritage sites advocated by the Nova Scotia Department of Natural Resources.

This site is unique in Canada and it just happens to be located within Cape Breton Highlands National Park. Does Parks Canada want to destroy a unique, natural feature? Does Parks Canada want this destruction to be part of its legacy? Where is the good governance? Where is the due diligence?

Ethical Issues for Parks Canada

If this project goes ahead as planned, I believe it has the potential to do great harm to Parks Canada's reputation at the regional, national and international levels.

When the land was expropriated for Cape Breton Highlands National Park in 1936, there was an understanding that the land, flora and wildlife would be protected. People had to give up their land, including the right to fish, hunt and cut wood within the National Park. (There were 70 homes and 300 private landowners within the park, including those at Green Cove). I interviewed GWR Creighton, the man who did the expropriations in 1936, on three separate occasions. For summary see Ken Donovan, "Wilfred Creighton and the Expropriations: Clearing Land for the National Park, 1936", *Cape Breton's Magazine*, no. 69, 1996, pp. 1-20. [interview] I have researched and published on the expropriations so I know this topic intimately.

Is this large monument an appropriate development in a National Park?

I very much support our veterans, but a national park is not an appropriate place to locate such a monument. My father, who lives in Ingonish and landed at Juno Beach in 1944, is a WWII veteran and my grandfather, who was from Meat Cove/ Bay St Lawrence, was a WWI veteran. My father, by the way, is not in favour of the monument.

Up to now, Parks Canada has been one of the bastions of protection for the environment in Canada. Parks Canada has among the strictest environmental protection in the world. We need to protect the environment for future generations. Is this an appropriate development in a National Park? The building of this large monument and associated infrastructure is contrary to the National Parks Act. Subsection 4 (1) of the Canadian National Parks Act states: "the parks shall be maintained and made use of so as to leave them unimpaired for future generations." Section 10 of the National Parks Act Regulations under the authority of the National Parks Act states: "No person shall remove, deface damage or display any flora or natural objects in a Park."

Finally, the mandate of Parks Canada states: "On behalf of the people of Canada, we protect and present nationally significant examples of Canada's natural and cultural heritage and foster public understanding, appreciation and enjoyment in ways that

ensure the ecological and commemorative integrity of these places for present and future generations. If the proposal to build a large monument and associated infrastructure at Green Cove is not a legitimate 'park management purpose', then it follows that it is contrary to the *Canada National Parks Act* - the very legislation that has been established to protect our national parks.

Parks Canada appears to be breaking the laws by which it is governed. These laws may be overcome by legal loop holes but the spirit of the law will be broken. Parks Canada risks losing the confidence of the Canadian people. If anyone doubts this lack of confidence, please examine the wide opposition to this project throughout the country and the scepticism that it has provoked.

The Process

Since the Never Forgotten National Memorial is to be a national memorial proposed for Parks Canada land, the memorial should be selected by public process. Instead, a private -interest group has spurred this development and it is directing the process. Since when is Parks Canada governed by private interests? Parks Canada: do you have any ethical concerns about this project? Where is the leadership?

The Never Forgotten National Memorial will destroy Cultural Resources at Green Cove

Evidence of Human Occupation at Green Cove from Pre Contact to the Present.

The DIA states on p. 36 that "there is low archaeological potential at the site." This is incorrect. There is evidence of Pre Contact people at Green Cove. Did the archaeological research design, submitted as part of the permit application, include testing, screening, etc., for pre-contact lithics, given that a pre-contact biface was located in Green Cove during an archaeological survey in 1982? A water worn, chipped stone artifact was found at Green Cove (15B17) during the 1982 archaeological survey by Doug Ross. The exact form (uniface/biface/tool fragment) of this artifact cannot be determined due to the heavy wear. The 1982 investigation was limited to surface survey, no testing was conducted. Thus there is potential for a pre-contact site at Green Cove. For evidence of Pre Contact occupation in the Ingonish /Green Cove area, see Ken Donovan, "Precontact and Settlement: Ingonish and Northern Cape Breton From the Paleo Indians to the 18th century" *The Nashwaak Review*, St. Thomas University, Fredericton, vols. 22-23, (Spring- Summer 2009), pp. 330-87. This publication is available at the link below and I have also attached a copy.

Occupation of Green Cove from the 16th to 20th century

There is a great deal of evidence to support the constant movement of the Mi'kmaq throughout Green Cove and northern Cape Breton. Since the 1520's the Bretons, Normans and Basques were also fishing off and out of Ingonish and using Green Cove as a *petit degat*, a temporary fishing station. Green Cove always had rich fishing grounds and still does. There is documentary evidence to support this and Ingonish families at Green Cove were digging French artifacts out of the ground when planting their gardens. (Interview of Walter LeFriend, 6 February 1985). Ingonish fishermen and their families moved to this summer fishing station for much of the 19th century and continued to do so until the mid-1950's. I have attached a map of house locations at Green Cove in 1886, based on the AF Church's map and census of households.

By April 1901 there were eight permanent families at Green Cove, a small fishing station some seven miles north of Middle Head. The eight permanent families included Ann and John McNeil, Esther and Joseph MacKinnon, Sarah and John Roberts, Catharine and Henry Dupe, Sarah and James Dupe, Melinda and Donald McKinnon, Annie and Donald McLellan and Jane and Thomas McLellan for a total of 44 residents. Annie Belle Donovan recalled that she often walked barefoot from her home in the Clyburn Valley to Green Cove during the 1880's and the 1890's to her family's summer fish house. As a young girl, Annie Belle, who was born in 1874, worked in her uncle George Brewer and uncle Jed Donovan's lobster factory at Green Cove. The Irish Catholic fishermen were joined by other fishing families from North Bay, Ingonish, and from Neil's Harbour as well as communities farther north in Cape Breton. (See Ken Donovan, "Mary Grace Barron and the Irish of Ingonish, Cape Breton, 1822-1999," *The Nashwaak Review*, Fredericton, New Brunswick, St. Thomas University, Number 6-7 (Fall, 1999), 177-237.) This publication is available at the link below and I have also attached it.

The DIA refers to the 19th and 20th century occupation of Green Cove and notes "there are no visible signs of these structures today...." The report also states: "Based on initial cultural resource scans, it is unlikely that human remains, funerary objects, sacred objects, or objects of cultural patrimony would be discovered during construction of the NFNMC." p.36

I know and can prove that there are cultural remains at Green Cove. On a field trip to Green Cove on 6 July 2008 my friends and I found house remains and other artifacts. One house with had a dry stone foundation, measured 24 by 15 feet, and had various artifacts lying within the house on the surface. These artifacts included stove parts, ceramics, earthenware items as well as parts of glass bottles. (Ken Donovan, Field notes, 6 July 2008) Nothing was touched or disturbed. At the time, I attempted to encourage Parks Canada managers to investigate these archaeological resources but my requests were not successful.

Visitor Experience at Green Cove

There is tremendous potential to interpret Green Cove and its settlement by aboriginal people and Europeans over the past 10,000 years. Leave everything in its natural state and use the natural and cultural resources (archaeological, documentary) that are available. Parks Canada is not aware of the rich cultural resources it has at Green Cove. The proposed monument will destroy the opportunity to interpret these resources for future visitors.

In conclusion, I am appalled by what is happening at Green Cove. I worked as an historian for Parks Canada for 35 years and I was proud of my employer. To see what is now proposed, goes against the values Parks Canada built up over many years.