

ERO 019-7891
COMMENTS FROM THE CITY OF LONDON
FEBRUARY 2, 2026

Overall	
Proposed MPAP process does not raise concerns.	
Archaeological Assessment Process (AAP) Project list	
Proposed Project Description	Comment
Initial stockpiling of de-icing material within an engineered permanent storage structure	It is difficult to understand why the initial stockpiling of this material is the concern with respect to the AAP. One would think that the initial construction of the engineered permanent storage structure would be the concern.
Prepare a draft summary report that includes a description of the project and project area, a description of the information relied upon in making the determination that the project area does not have archaeological potential and the reasons for the determination.	There is an element of risk from the perspective of the City where Indigenous communities can question whether or not an area has archaeological potential, despite what the Archaeological Management Plan may indicate when a Stage 1 archaeological assessment is not completed (i.e. project area does not have potential for archaeological resources). How will this be mitigated?
Provide notice of the final summary report to Indigenous communities, MECP, MCM and post a copy of the notice and report on the proponent's website	Is there risk of sensitive or confidential information (i.e. information that could be used to locate an archaeological site, information related to an ancestor, traditional knowledge, etc.) that may be compelled to be posted on these websites?
"These projects would not be subject to the archaeological assessment requirements if the level of archaeological assessment has been completed for the project area since 2011 and entered into the Register mentioned in section 65.1 of the Ontario Heritage Act."	This is a new consideration. The current practice is to accept previous archaeological assessments. It appears that this regulation may compel re-assessment of areas subject to prior archaeological assessment if that prior archaeological assessment was completed before 2011. This could have implication for long-planned infrastructure projects and other municipal projects.
Proposed Project Description	Comment

This proposal compels, through MPAP, Indigenous engagement during Stage 1 archaeological assessment through notice + 30 day commenting period.	Currently, the City is engaging with Indigenous communities on Stage 2+ archaeological assessment reports in compliance with Policy 615_, The London Plan for all municipal projects (not just EA projects).
Construction of a new collector road, or reconstruction or widening of an existing collector road that will not be for the same purpose, use, capacity or at the same location, greater than 1 lane kilometer (i.e., 1km single-lane road)	Suggest the definition of “collector road” in the AAP Project List be clarified given the terminology and classification may differ depending on the municipality.
Provide for a minimum of 30 days for review and comment on the draft summary report.	The Archaeological Assessment Process requires proponents to provide Indigenous communities 30 days for review of archaeological assessment reports. What are the minimum requirements to ensure that we have met the consultation requirement with Indigenous communities?
Additional Comments	
Besides completing the new Archaeological Assessment Process, reconstruction or widening of roads by a municipality is proposed to be exempt from the EA process. What are the minimum requirements for consultation that would support property acquisition required to facilitate road widening? Municipalities typically rely on EAs to defend the “taking” of the property as being fair, sound and reasonably necessary.	
Do municipalities need to provide an expedited review letter to the MCM as part of the Archaeological Assessment Process for projects planned for construction shortly after the review/waiting period? The proposed process includes a 30-day review period by MCM, and a 35 day waiting period prior to construction. If no response is received by the MCM during the waiting period, does the proponent have clearance to start construction?	
Proposed Municipal Project Assessment Process (MPAP)	
Project list	
Agree with the addition of projects applicable to private sector.	
Appreciate changes made based on first round of consultation.	