




PUBLIC UPON APPROVAL

DOCUMENT OF THE INDEPENDENT CONSULTATION AND INVESTIGATION MECHANISM

**RECOMMENDATION FOR A COMPLIANCE REVIEW AND
TERMS OF REFERENCE**

DRAINAGE IN THE MUNICIPIOS OF LA PAZ AND EL ALTO

**(BO-L1028)
(2440/BL-BO)**

This document was prepared by Arantxa Villanueva, Coordinator of the Compliance Review Phase, and Julio Patiño, Case Officer, under the supervision of Victoria Márquez-Mees, ICIM Director.

This document contains confidential information relating to one or more of the ten exceptions of the Access to Information Policy and will be initially treated as confidential and made available only to Bank employees. The document will be disclosed and made available to the public upon approval.

INFORMATION NOTE

Guidelines for the Compliance Review Phase

These guidelines for the compliance review phase have been prepared in accordance with paragraphs 36 to 41 of the Policy of the Independent Consultation and Investigation Mechanism (ICIM) (document MI-47-6), taking into account that the Transition Plan (MI-48-1) established that this case would be processed under the new ICIM Policy following the conclusion of the ICIM transition period.¹

A compliance review is a fact-finding process to determine whether Management at the Inter-American Development Bank (IDB) has complied or failed to comply with its relevant operational policies for the operation(s) in question and whether the alleged harm is related to failure by the Bank to comply with the relevant operational policies.

A compliance review by the ICIM is subject to authorization by the IDB Board of Executive Directors, which receives for consideration a recommendation from the ICIM once the latter, within a maximum period of 21 business days, has analyzed the main documents relating to the operation, the information provided by Management, the request, and the relevant operational policies. In its recommendation, the ICIM states its decision to recommend or not to recommend an investigation considering the value added for the specific case, not for the Bank in general, in terms of relevance, impact, and efficiency.

For those cases in which an investigation is recommended, the ICIM includes the following information in the recommendation:

- The objectives of the investigation.
- The scope of the investigation, including the proposed investigative questions. In all cases, the investigation is limited in scope to the allegations made in the request and focuses exclusively on Bank acts or omissions in the context of the operation(s) relevant to the case, in relation to compliance with the relevant operational policies.
- The methodology to be used, including the proposed investigative method(s), the activities to be carried out, and the products to be delivered.
- The investigative team, which is made up of the compliance review phase coordinator serving as panel chair, as well as two members selected from the roster of experts. The selection of these experts is based on their expertise in the technical areas concerning the investigation and on their availability to participate in the investigation during the required timeframe. These experts are hired only after the Board of Executive Directors approves the investigation, and their contributions are incorporated into the compliance review report.
- The timeline for the investigation, generally not to exceed a maximum period of six calendar months from the date of establishment of the panel. If a longer period is needed, the recommendation indicates the required timeline and the corresponding rationale.

¹ The ICIM transition period concluded on 16 January 2016 with the establishment of the permanent governance structure.

- The estimated budget for the investigation.

Prior to being presented to the Board of Executive Directors, a preliminary draft of the recommendation is circulated to Management and the requesters, and both parties have the opportunity to submit comments in writing to the ICIM. The ICIM reviews the comments and takes those it deems relevant. The comments received from the two parties are included as annexes to the recommendation. The final version of the recommendation is submitted to the Board of Executive Directors for consideration by short procedure. The investigation is considered approved if by the end of the period established for approval by short procedure, it has not been interrupted by any members of the Board of Executive Directors. However, if an Executive Director interrupts the procedure, the item is placed on the agenda for discussion by the Policy and Evaluation Committee and subsequent consideration by the Board of Executive Directors.

The recommendation is a public document, and the decision taken by the Board of Executive Directors with respect to the recommendation is notified to the requesters, Management, and the general public through the ICIM Public Registry (www.iadb.org/mici).

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Annex I	Management's Comments on the Preliminary Version of the Recommendation for a Compliance Review
Annex II	Requester's Comments on the Preliminary Version of the Recommendation for a Compliance Review

ELECTRONIC LINKS	
1.	Original request http://www.iadb.org/document.cfm?id=38942187
2.	Management's response to the request http://www.iadb.org/Document.cfm?id=40170095
3.	Memorandum of eligibility for the consultation phase http://www.iadb.org/Document.cfm?id=38976486
4.	Memorandum of eligibility for the compliance review phase http://www.iadb.org/document.cfm?id=39056222
5.	Project profile http://www.iadb.org/Document.cfm?id=35232200
6.	Loan proposal http://www.iadb.org/Document.cfm?id=35430878
7.	Plan of operations BO-T1058 http://www.iadb.org/Document.cfm?id=944587
8.	Environmental analysis http://www.iadb.org/Document.cfm?id=35327744

ABBREVIATIONS

ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Management Report
GADLP	Gobierno Autónomo Departamental de La Paz [Autonomous Departmental Government of La Paz]
GAMLP	Gobierno Autónomo Municipal de La Paz [Autonomous Municipal Government of La Paz]
ICIM	Independent Consultation and Investigation Mechanism
PEU	Project execution unit
PMDP	Plan Maestro de Drenaje Pluvial de La Paz [Storm Drainage Master Plan of La Paz]
PPRR	Project for the Prevention, Rehabilitation, and Reconstruction of Urban Infrastructure Damaged by Natural Hazards
PPM-PASA	Prevention and Mitigation Program and Environmental Monitoring and Enforcement Plan

EXECUTIVE SUMMARY

This document is a recommendation to the Board of Executive Directors by the Independent Consultation and Investigation Mechanism (ICIM) to conduct a compliance review of the program Drainage in the Municipios of La Paz and El Alto (BO-L1028), in relation to claims made by a business owner alleging economic losses and lack of adequate public consultations and disclosure of information on the program.

The program is a multiple works investment loan operation with a sovereign guarantee from the Plurinational State of Bolivia that was approved on 3 November 2010 by the IDB Board of Executive Directors for a total amount of US\$33 million, issued to the municipal governments of La Paz and El Alto, in their capacity as the executing agencies. The objective of the program is to help improve quality of life for inhabitants of the municipios of La Paz and El Alto by reducing the human loss and property damage caused by extreme geo-hydro-meteorological events. It has two components: the first consists of works to control flooding, erosion, and landslides; and the second focuses on institutional development and environmental management to guarantee the sustainability of the drainage systems.

The request was presented to the ICIM on 27 March 2014 by the owner of a business located in one of the areas impacted by the program, who asked for confidentiality, citing fear of retaliation. Accordingly, the public version of this document will redact any information that could reveal his identity. The requester alleges [REDACTED]

[REDACTED] in the city of La Paz, [REDACTED], blocked customer access, causing considerable economic losses and critically affecting his household finances. This is because, according to the requester, the closure lasted for longer than originally notified. The requester send photographic evidence of the restricted access to the ICIM. He also claimed that the consultation processes did not provide detailed information on the impacts on businesses or on the works mitigation measures.

This request was received during the effective period of the Policy Establishing the Independent Consultation and Investigation Mechanism (document GN-1830-49) approved by the Board in February 2010. It was declared ineligible for the consultation phase because the requester was not amenable to participating in it. Subsequently, on 21 July 2014, the case was transferred to the compliance review phase, and the panel chair at the time determined that it was eligible for that phase on 8 September 2014. On 17 December 2014, the Board approved the new ICIM Policy (document MI-47-6), and in accordance with the provisions of the Transition Plan approved by the Board on 4 February 2015 (document MI-48-1), the case was handled from that date forward in accordance with the new ICIM Policy.

In accordance with paragraph 41 of the ICIM Policy (document MI-47-6) and as discussed in detail in this document, a recommendation is made to the Board to authorize the ICIM to conduct a compliance review process of the program, for the purpose of performing an impartial and objective investigation of the allegations made by the requester regarding potential noncompliance by the Bank with operational policy OP-703, and if the findings confirm the allegations, determining whether that could have caused the alleged harm.

This investigation is recommended because of both the importance of the specific case presented by the requester, in which, if the allegations are confirmed, a Bank operation would have impoverished a family in the region with no adequate mitigation actions

planned to prevent that outcome, and its impact in a broader context, inasmuch as the ICIM has received other requests dealing with issues similar to those of this request (lack of identification and mitigation of socioeconomic impacts and public consultations), and an investigation would provide useful information as to how the Bank currently applies the relevant operational policies and whether this could be leading to systemic omissions that are affecting vulnerable communities in the region.

The ICIM hereby submits for the consideration of the Board the recommendation to conduct a investigation with special characteristics, given the case in question and the ICIM delay in processing it, as follows: (i) conduct a desk investigation, solely for the purpose of safeguarding the confidentiality of the requester; and (ii) shorten the investigation period to three months.

To support the Board's decision process, this document has five sections and two annexes. Section I gives a brief overview of the Bank-financed program; Section II summarizes the allegations made by the requester both in the request and in the various communications maintained with him throughout the process involving this case; Section III contains Management's response to the allegations made by the requester; Section IV summarizes ICIM activities to date; and Section V presents the reasoning behind the recommendation to investigate and the proposed terms of reference for the compliance review: proposed rationale, scope, methodology, timeline, team, and budget.

In accordance with the ICIM Policy, a preliminary version of this document was sent to the requester and to Management for their comments, which were carefully analyzed. This final version reflects that analysis and has been adjusted as the ICIM has deemed relevant. Management's and the requester's comments can be consulted in the annexes.

I. THE PROJECT²

A. Background

- 1.1 Because of its complex geological, geotechnical, hydrological, and topographical conditions, maintenance of the city's urban infrastructure in general is very difficult, and it faces frequent natural hazards such as floods, landslides, washouts, debris flows, and flash floods. During the rainy season, drainage problems result in emergencies associated with overflows, floods, structural collapses of the main sewers, landslides, and slope destabilization, causing human losses and property damage.³
- 1.2 On 19 February 2002, a historically unprecedented hail storm in the city of La Paz and surrounding areas caused 70 deaths and over US\$70 million in damage. In response, the Autonomous Municipal Government of La Paz (GAMLP) requested Bank support to execute a series of emergency works. A Bank team visited the main areas damaged by the rains and determined that given the nature and complexity of its drainage problem, the city needed a storm drainage master plan to chart long-term interventions and serve as a financing instrument for structural and nonstructural interventions that would allow for the proper functioning of the storm drainage system.⁴
- 1.3 The Bank agreed that actions to solve the problems of the storm drainage system and handle risk management would be included in a comprehensive medium- and long-term strategy. As part of the agreed upon strategy, the Bank approved technical-cooperation operation ATN/JC-8537-BO, with financing from the Japanese Trust Fund for Consultancy Services, to revise and update the Storm Drainage Master Plan of La Paz (PMDP). This technical-cooperation operation is being executed and is expected to conclude in April 2007. The operation determined the investment needs—estimated at US\$60 million—for storm water drainage for the city through 2025. It likewise identified a pipeline of storm water drainage projects to be executed in the short term with financing under loan BO0223.⁵

B. Drainage in the Municipios of La Paz and El Alto (BO-L1028) and La Paz Storm Drainage Program (BO0223)

- 1.4 The first operation, the La Paz Storm Draining Program (BO0223, 1926/BL-BO), was approved in November 2007 with the objective of supporting the GAMLP with implementation of complementary works and actions to improve the city's storm water drainage system and its management. It was designed as a multiple works investment program and set up as the first group of interventions under the PMDP. The goal of the program was to help improve the quality of life of the city's

² The information presented in this chapter summarizes information contained in Bank documents related to the program. The sole objective is to provide basic and contextual information on the program in relation to the issues raised in the request.

³ Project profile, p. 1.

⁴ Plan of operations, BO-T1058, 29 March 2007, pp. 1-2.

⁵ Plan of operations, BO-T1058, 29 March 2007, p. 2.

inhabitants, and its purpose was to reduce the human loss and property damage caused by extreme geo-hydro-meteorological events.⁶

- 1.5 In November 2010, operation 2440/BL-BO was approved. This program, Drainage in the Municipios of La Paz and El Alto (BO-L1028),⁷ was the second supporting the implementation of drainage works in the PMDP. As with program BO0223, this was a sovereign guaranteed operation in the water and sanitation sector that was designed as a multiple works program totaling US\$33 million, of which US\$30 million was financed by the Bank and US\$3 million by the municipal governments of La Paz and El Alto. The program was classified as a category "B" operation, in accordance with operational policy OP-703. [REDACTED]

- 1.6 The goal of the program is to help improve quality of life for inhabitants of the municipios of La Paz and El Alto by reducing the human loss and property damage caused by extreme geo-hydro-meteorological events. To achieve this goal, the program calls for the construction of works and complementary activities to improve the storm drainage systems of La Paz and El Alto and their management. It has two components: (1) works to control flooding, erosion, and landslides; and (2) institutional development and environmental management to guarantee the sustainability of the drainage systems.

- 1.7 The financing arrangements for the works envisaged under program BO-L1028 were initiated in the framework of project BO0223, which would have provided financing for the preparation of social and environmental assessments and technical, economic, social, and environmental studies.

- 1.8 [REDACTED] so in September 2012, the municipal government of La Paz asked the Bank's Country Office in Bolivia for its no objection to the bidding documents for the work, in accordance with the approval procedures for multiple works operations at the Bank.

- 1.9 At present, [REDACTED] have been completed in their entirety.⁸

II. THE REQUEST⁹

- 2.1 The request¹⁰ was presented to the ICIM on 26 March 2014 by [REDACTED]

⁶ Loan proposal 1926/BL-BO, 10 January 2007, p. 4.

⁷ The request refers to a specific work executed in La Paz, so documentation on the storm drainage works program in El Alto will not be analyzed.

⁸ [REDACTED]

⁹ The requester asked for confidentiality, citing fear of retaliation. As a result, the public version of this document will be redacted to safeguard his identity.

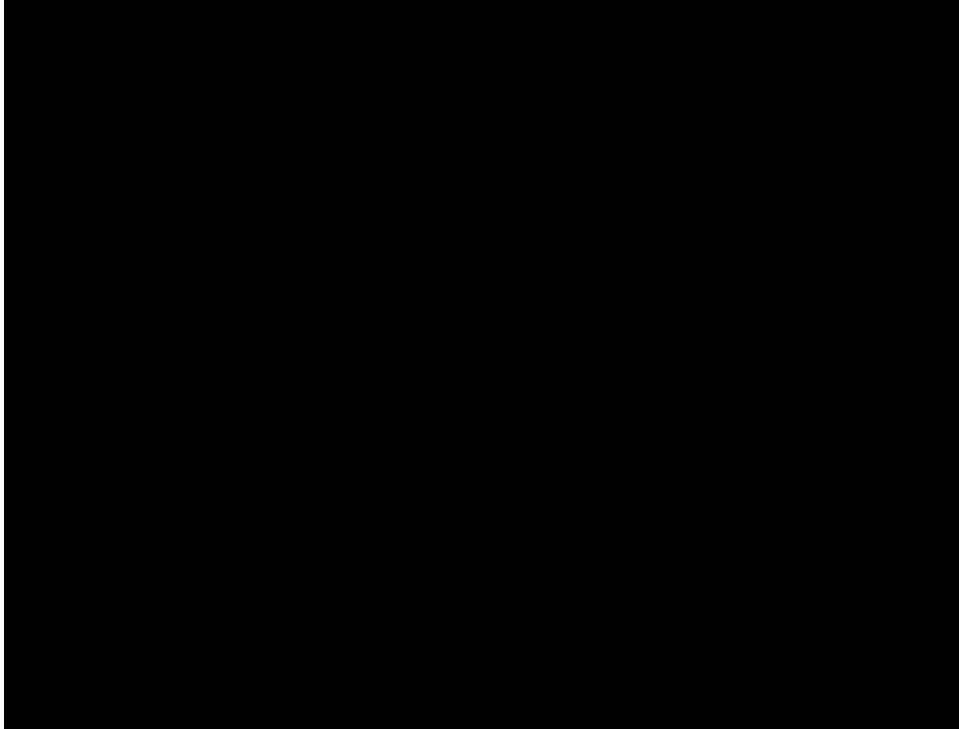
¹⁰ A summary of the request that was received is available in the electronic links section of this document.

- 2.2 In the request, [REDACTED] says that the restrictions on vehicular traffic that were required for the works over a period of 12 months had a negative impact on his business since his customers did not have vehicular access to the locale. The roads were closed owing to the drainage works [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]



████████████████████
████████████████████

- 2.3 The requester comments that during the hearings convened to inform the locals, they were notified that for construction of the works, ██████████ would have to be closed for a maximum period of six months. However, he alleges that construction lasted for longer (12 months) than notified and as a result of the erroneous information, he did not take the necessary precautions to contend with the drop in sales resulting from lack of access. The requester claims that if precise information had been provided, he would have been able to plan accordingly and prevent his business from taking as hard of a hit as it did.
- 2.4 In addition, he says that during the same hearings, the local business owners called attention to the impact that the road closure would have on their businesses and the response by the executing agency was to give assurances that the works would be completed within a maximum of six months.
- 2.5 According to the requester, ██████████ the closure of the road to vehicles for the alleged period caused a drop in his income, on the order of 80% of monthly income according to the requester. As a result of the decline in customers and income, he was also forced to dismiss ██████████ members of his staff when he could no longer pay their wages. These dismissals generated an additional unanticipated cost due to the severance expenditures he incurred.
- 2.6 The lack of cash flow, claims the requester, also caused him to default on his payment obligations with suppliers. This, in turn, meant that he could not restock his inventory, which led to a further decline in business income.

- 2.7 Lastly, the requester states that [REDACTED]
[REDACTED]
[REDACTED]
- 2.8 Among other allegations, the requester indicates [REDACTED]
[REDACTED]. The requester also claimed that houses near the project were at risk of collapse due to the construction method, which, in his opinion, would contravene operational policy OP-704.
- 2.9 In summary, the requester claims that he is now experiencing a very precarious economic situation that has directly affected his ability to support his family, as a result of the drainage works financed by the Bank.

III. MANAGEMENT'S RESPONSE

- 3.1 With respect to the issues raised in the request, during the phase to determine eligibility for the compliance review phase, Management sent its response¹¹ to the requester. A summary of its response follows.
- 3.2 Management reported that in the course of project monitoring activities, it was never aware of any official complaint against the executing agency by the locals. It only became aware of the requester's complaint in December 2013, which was filed directly with the Bank and forwarded immediately to the executing agency.¹²
- 3.3 With respect to compliance with the Access to Information Policy, Management indicated that the Bank has always taken care to ensure that both the direct beneficiaries and the public at large are well informed about the project, following the guidelines established in the Bank's Access to Information Policy: various forms of communication have been used to inform the locals, and activities have been held to raise awareness about the work and the process since April 2013.¹³
- 3.4 Moreover, the Bank said that, through the executing agency, it ensures that during execution the obligation to meet technical and environmental specifications is enforced on the contractor executing the works, and the obligation to carry all-risks insurance is enforced on the construction company. It added that the Bank's sector specialist conducted periodic visits to the work sites, which are documented and kept in the IDB archives, for the purpose of verifying compliance with the technical and environmental standards stipulated in the works contracts. In addition, the specialist confirmed that a consultant was hired to advise and support the executing agency.¹⁴
- 3.5 In Management's opinion, the Bank was compliant in terms of both project execution and the comprehensive approach to disaster risk management in cities like La Paz, providing support to the GAMLP for the development and financing of

¹¹ At the request of the panel chair at the time, Management sent its comments to the ICIM on 12 August 2014. A link to the document can be found in the electronic links section.

¹² Management's response, page 2.

¹³ Management's response, pp. 2-3.

¹⁴ Management's response, page 5.

the Storm Drainage Master Plan through to the execution of works and implementation of actions to prevent disasters.¹⁵

- 3.6 Lastly, Management confirmed that the contractual deadlines of 270 days were met and that the locals were notified in a timely manner about the duration of the works, including the paving work that was not an activity financed by the Bank. It specified that the work in the area affecting the requester lasted five months but that his business was never entirely without vehicular access. In Management's opinion, the improvements benefited the locals by making it easier to get around and increasing the value of their properties.¹⁶

IV. THE ICIM PROCESS TO DATE

- 4.1 The request was received under the Policy Establishing the ICIM, approved by the Board in February 2010 (document GN-1830-49). The request was declared ineligible for the consultation phase because it did not meet the requirement set out in paragraph 40(g) of the policy.¹⁷
- 4.2 On 21 July 2014, the case was transferred to the compliance review phase, and the panel chair at the time determined that it was eligible for that phase on 8 September 2014.
- 4.3 On 17 December 2014, the Board approved the ICIM Policy (document MI-47-6) and gave instructions for its immediate entry into force. Complementarily, on 4 February 2015, the Board approved the Transition Plan (document MI-48-1), in which it was determined that from that date forward, the case would be handled in accordance with the provisions of the plan for the transition period, and after the transition period, in accordance with the policy.
- 4.4 On 16 August 2015, the ICIM Director assumed her duties and began preparing this document, a draft version of which was distributed to the requester and to Management for purposes of soliciting their comments. Both parties had a period of 21 business days to submit comments, beginning on 19 January 2016. The comments have been carefully analyzed, and the ICIM appreciates the observations and points made by each party. This version of the document has incorporated, in an impartial and objective manner, the comments that the ICIM deemed relevant. The original comments made by each party are available in the annexes.¹⁸
- 4.5 The ICIM recognizes that in the framework of the restructuring process under the new ICIM Policy, it has taken longer than initially planned to process this case. It also acknowledges that it has failed to meet the time periods set in the ICIM Policy. However, the delay is due to the fact that the new ICIM team is taking a fresh look at the case based on the experience it has gained in two parallel investigations,

¹⁵ Management's response, page 5.

¹⁶ Management's response, pp. 6-7.

¹⁷ Paragraph 40(g) of the 2010 policy, which has since been superseded, established as a requirement for a request that the parties had to be amenable to participating in a consultation phase process in order for that phase to be eligible.

¹⁸ Some of Management's comments contain information that could reveal the identity of the requester and have thus been redacted for the public version of this document.

which is enabling it to manage this case more efficiently without compromising the effectiveness of the investigation.

V. RECOMMENDATION FOR A COMPLIANCE REVIEW

- 5.1 This Recommendation for a Compliance Review and Terms of Reference is hereby submitted for the consideration of the Board in accordance with paragraphs 39, 40, and 41 of the ICIM Policy currently in effect (document MI-47-6).
- 5.2 In accordance with paragraph 41 of the policy, a recommendation is made to the Board to authorize the ICIM to conduct a compliance review of the program Drainage in the Municipios of La Paz and El Alto (BO-L1028) and any aspect of the La Paz Storm Drainage Program (BO0223) that may be relevant in relation to the former, for the purpose of determining whether the Bank failed to comply with operational policy OP-703, and if the finding is that it did, whether such noncompliance would have caused the harm alleged by the requester.
- 5.3 The ICIM points out that the requester refers to harm with a considerably negative impact on his bottom line and the welfare of his family. It also observes that the requester and Management make contradictory statements and express different viewpoints on the allegations of harm and compliance with policies. Accordingly, the ICIM recommends conducting an investigation to clarify the facts as related to Bank acts or omissions, based on the provisions set out in the relevant operational policies. In particular, the ICIM feels it is important to recommend this investigation in order to identify whether there are systemic elements concerning the identification of economic impacts on vulnerable communities and the implementation of effective mitigation measures to prevent or reduce the risk of impoverishing such communities as a result of Bank-financed operations, as well as to look at public consultation processes carried out in the framework of such operations.
- 5.4 The reasons underpinning the ICIM's decision to make this recommendation are presented below, as are the proposed scope, methodology, timeline, and budget.

A. Rationale

- 5.5 The ICIM has grouped the requester's allegations into two broad categories or issue areas related to operational policy OP-703, analyzed below, for purposes of conducting the respective analysis and recommending this compliance review, as follows:
- a. Identification, evaluation, and mitigation of impacts on economic activities in the area affected by the work;
 - b. Public consultation, citizen participation, and access to information.

In relation to compliance with the Environment and Safeguards Compliance Policy (OP-703) concerning the identification, evaluation, and mitigation of impacts.

- 5.6 The requester claims that adequate mitigation measures were not taken to protect his business from economic losses, and the measures that were initially announced were not fulfilled. Specifically, he alleges that there were substantial negative impacts on his business [REDACTED] [REDACTED] for a longer period than initially notified, blocking customer access and

resulting in economic losses that would continue, in the long run, to affect him and also his personal and family life. These losses, he alleges, were made worse by [REDACTED]

- 5.7 Operational policy OP-703 establishes the requirement that Management should identify the key direct and indirect impacts and risks of an operation, such as analyzing whether the projects could generate some type of economic risk for the affected individuals, and design measures to avoid, minimize, compensate, and/or mitigate them. It also requires the creation of a framework for monitoring social and environmental impacts and risks throughout project execution.
- 5.8 Based on a preliminary review of some of the project documents, the ICIM found that business owners in the area affected by the works had expressed their concerns about the economic impact risk associated with the works at information meetings in the area.¹⁹ However, in the preliminary review of documentation, no information was found on the identification, evaluation, or mitigation of this type of impact, though there were some reports of delays in works.
- 5.9 Management claims that it implemented a physical intervention program by sections, including pedestrian walkways so that access would not be impeded and business could remain open. It added that cross streets were opened so they could be used temporarily for customers.
- 5.10 However, the requester submitted photographs to the ICIM showing that for at least some period of time, there was no access to his business. Furthermore, he alleges that works lasted for more than one year, despite the information received from the executing agencies indicating a shorter period.
- 5.11 The ICIM therefore believes that a compliance review would help corroborate the foregoing information to determine whether the Bank complied with the provisions of operational policy OP-703 concerning the evaluation and identification of works-related impacts and risks for local businesses, and whether the mitigation measures had been sufficient, or effectively carried out, to avoid, minimize, compensate, and/or mitigate economic impacts on the requester's business, as provided in operational policy OP-703.
- 5.12 Regarding the claims of an [REDACTED] the ICIM believes this issue to be beyond the scope of the project financed by the IDB, even if it might have had implications for the requester's financial situation. Consequently, this aspect would not be included in the recommended compliance review.
- 5.13 Regarding the allegations by the requester and Management regarding disaster risk in terms of operational policy OP-704, the ICIM has determined that the allegations correspond to impacts derived from the construction works covered under operational policy OP-703, which would not be related to the economic harm alleged by the requester, so this aspect would not be included in the recommended compliance review.

■ [REDACTED]

In relation to compliance with the Environment and Safeguards Compliance Policy (OP-703) concerning public consultation, citizen participation, and access to information.

- 5.14 The request indicates that the processes for public discussion of the works were merely informational, and adequate consultation and participation processes to engage the affected parties did not happen. Specifically, the requester alleges that the information provided on the works was not correct, simple, or transparent, and had he known in advance how long the work would actually take, he would have taken steps to prevent the extended closure of the roads from affecting him as he claims it did.
- 5.15 For its part, Management indicated that the project included activities to explain and publicize the works and diverse strategies were adopted to get information out to the public. It also reported that it was unaware of any complaints by locals, but that in any case, anyone can file a complaint or query through the general system (SITRAM) run by the GAMLP, and even track its status.
- 5.16 In accordance with operational policy OP-703, operations like BO-L1028 must include consultation or participation programs in the Environmental and Social Management Plan (ESMP). These programs require consultations with the affected parties and consideration of their viewpoints, for which information should be provided in a way that allows for meaningful consultations so the affected parties can form opinions and make comments on the proposed course of action. Following approval, the Bank should ensure that the borrower continues to make significant efforts to disseminate information and hold consultations, based on the arrangements agreed upon in the ESMP. Furthermore, during project execution, the Bank should ensure that the affected parties are being informed of any social and environmental mitigation measures that are implemented.
- 5.17 A preliminary analysis of the documentary record reveals that the program called for participation and information processes, and that meetings to explain and publicize the program would have been held prior to the startup of works. At meetings with residents and business owners in the affected area, the participants would have voiced their concerns about the impacts of the works, which they also would have communicated in writing in the framework of those processes. However, the requester claims that the concerns that were expressed were not taken into account and that the information that was provided was not consistent with what actually happened.
- 5.18 A compliance review would make it possible to determine whether the Bank ensured that the citizen consultation and participation processes provided an opportunity for the affected parties to learn about the program and participate effectively in the consultation processes, with their contributions given consideration as part of the process of identifying, evaluating, and mitigating impacts. It will also make it possible to determine whether the Bank ensured that the affected parties were informed of any change in the execution of the works that could have increased the risks to commercial activity, as required in operational policy OP-703.

B. Scope

- 5.19 This recommendation proposes to the Board that an investigation should be conducted of the loan operation Drainage in the Municipios of La Paz and El Alto (BO-L1028), in order to verify Bank compliance with operational policy OP-703.
- 5.20 The investigation would focus on the identification of impacts on businesses in the area of the work and the design and implementation of the corresponding mitigation measures, as well as the processes for citizen participation and consultation and access to information on the work, in the framework of operational policy OP-703. The ICIM notes that the program Drainage in the Municipios of La Paz and El Alto, as well as other related operations, involves a number of works to improve the drainage systems in the two municipios. An ICIM investigation would only look at the culvert works in the specific area with which the request is concerned; any investigation of other components or works under the program or other operations would be outside the scope of the proposed compliance review.
- 5.21 The product of this investigation is a compliance review report on the program Drainage in the Municipios of La Paz and El Alto (BO-L1028), which would describe the investigation in detail, the findings of the investigation, and the conclusions based on the evidence of compliance or failure to comply with the relevant operational policies, and the link between a possible failure to comply and the harm alleged by the requester. In addition, the report could include case-specific recommendations and also general recommendations on any systemic issues that might be identified.
- 5.22 Considering the statements made by the parties, as well as the information to which the ICIM has had access, the investigation will focus on answering the following questions with respect to the identification, evaluation, and mitigation of impacts:
- a. In the design and execution of [REDACTED], were potential negative socioeconomic impacts that the works might have on local businesses as a result of the temporary road closure identified and evaluated in compliance with operational policy OP-703?
 - b. Were measures taken to avoid, minimize, compensate, and/or mitigate the negative economic impacts on local businesses?
 - c. If such measures were established, did the Bank ensure their suitability and that they were implemented?
 - d. If not, did it contribute to the harm alleged by the requester?
- 5.23 With respect to the consultation processes, citizen participation, access to information:
- a. Were adequate and participatory consultation processes held with the people in the area affected by the works, in accordance with operational policy OP-703?
 - b. If consultation and information processes did not proceed in accordance with operational policy OP-703, could this have contributed to the harm alleged by the requester?

C. Proposed methodology

5.24 The proposed investigation would review the documentary record and conduct targeted interviews with the project team as the primary method of inquiry. The findings would be compared against the relevant operational policies to make a determination of compliance or noncompliance with the policies. Lastly, in the case of a finding of noncompliance, a causal analysis would be conducted to determine whether there was any link between the noncompliance and the alleged harm.

5.25 Based on the above, the ICIM would carry out the following activities:

1. Preparation of terms of reference for the experts

2. Interviews with the following actors:

- Bank staff involved in the operation at Headquarters and the Country Office in Bolivia.
- Consultants involved in the design, preparation, and execution of the program.
- Requester, by telephone.
- Any other individuals who may be identified as relevant during the investigation.

3. Review of documentation

- Review of public and confidential documents related to the operation that are relevant to the scope of the investigation.
- Review of documents presented by the requester to the ICIM.
- Reports and other documents issued by the executing agency, external consultants, or other third parties involved in the operation and related to the work in question.

4. Review of reports prepared by experts

5. Comparative analysis and determination of the main findings

6. Preparation of preliminary report

D. Timeline and team

5.26 In accordance with the provisions of the ICIM Policy, the proposed investigation would be completed within **three calendar months** from the creation of the Compliance Review Panel. The shorter investigation period reflects the fact that the ICIM has taken longer than initially planned to process this request and understands the need to provide the parties with a response as soon as possible.

5.27 Considering that this recommendation is being presented in the last quarter of 2016, and in line with the policies and procedures for contracting experts, the investigation would begin in early 2017 and conclude by the end of the first quarter of 2017, if it is approved by the Board under this short procedure. The proposed schedule of activities is presented below:

Table 1
Proposed schedule of activities for the compliance review
of case MICI-BO-2014-079

Compliance Review for BO-L1028		MONTH 0					MONTH 1				MONTH 2				MONTH 3				
SCHEDULE OF ACTIVITIES		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
1	Contracting of experts																		
2	Preliminary desk review																		
3	Interviews with Bank personnel																		
4	Targeted desk review - verification of findings																		
5	Preparation of reports on findings by experts and corroboration of information																		
6	Preparation of preliminary report																		
7	Final verification of data																		
8	Release of preliminary report																		

5.28 The investigation team would consist of:

- Arantxa Villanueva, Compliance Review Phase Coordinator
- Expert 1²⁰
- Expert 2
- Julio Patiño, Case Officer

E. Budget

5.29 The cost of this investigation is estimated at [REDACTED] to cover the fees of the two experts.

²⁰ The experts have not yet been selected.

MANAGEMENT'S COMMENTS ON THE PRELIMINARY VERSION OF THE RECOMMENDATION FOR A COMPLIANCE REVIEW

IDB Management's Response to the ICIM Request Drainage in the Municipios of La Paz and El Alto (BO-L1028)

I. Background

In 2002, heavy rains fell, causing rivers to overflow their banks and devastating the downtown and southern parts of the city of La Paz. This natural disaster revealed serious vulnerabilities in the city's infrastructure and put pressure on the Autonomous Municipal Government of La Paz (GAMLP) and civil society to take action to reduce this type of risk.

In response, the GAMLP, through the Project for the Prevention, Rehabilitation, and Reconstruction of Urban Infrastructure Damaged by Natural Hazards (PPRR), requested IDB support for a series of emergency works with an approximate cost of US\$15.4 million. In July 2002, an IDB mission visited the main areas that were destroyed by the rains and confirmed the critical state of the drainage system, despite reconstruction and repair works that were being executed with very limited resources under IDB technical cooperation agreement 929/SF-BO.

In December 2003, the IDB approved US\$750,000 in financing from the Japanese Trust Fund for Consultancy Services (ATN/JC-8537-BO), which was used to review and update the Storm Drainage Master Plan for La Paz (PMDP), the final version of which was presented in October 2007.

Based on this document, two loan operations were approved to mitigate the risk of hydro-meteorological events in La Paz. The first (BO0223) was approved in November 2007 and concluded in October 2013. The second (BO-L1028), which also included the adjacent municipio of El Alto, was approved in November 2010, and its last disbursement is scheduled for November 2016.

The PMDP included a pipeline of urgent rehabilitation and/or expansion works and activities that would be needed immediately to deal with the critical state of the system. This pipeline included the project "[REDACTED]"

[REDACTED]

The program Drainage in the Municipios of La Paz and El Alto (BO-L1028) was approved by the Board of Executive Directors in November 2010. It complied with the Bank's environmental policies, and the Environmental and Social Management Plan (ESMP) for the operation was released to the public.

[REDACTED]

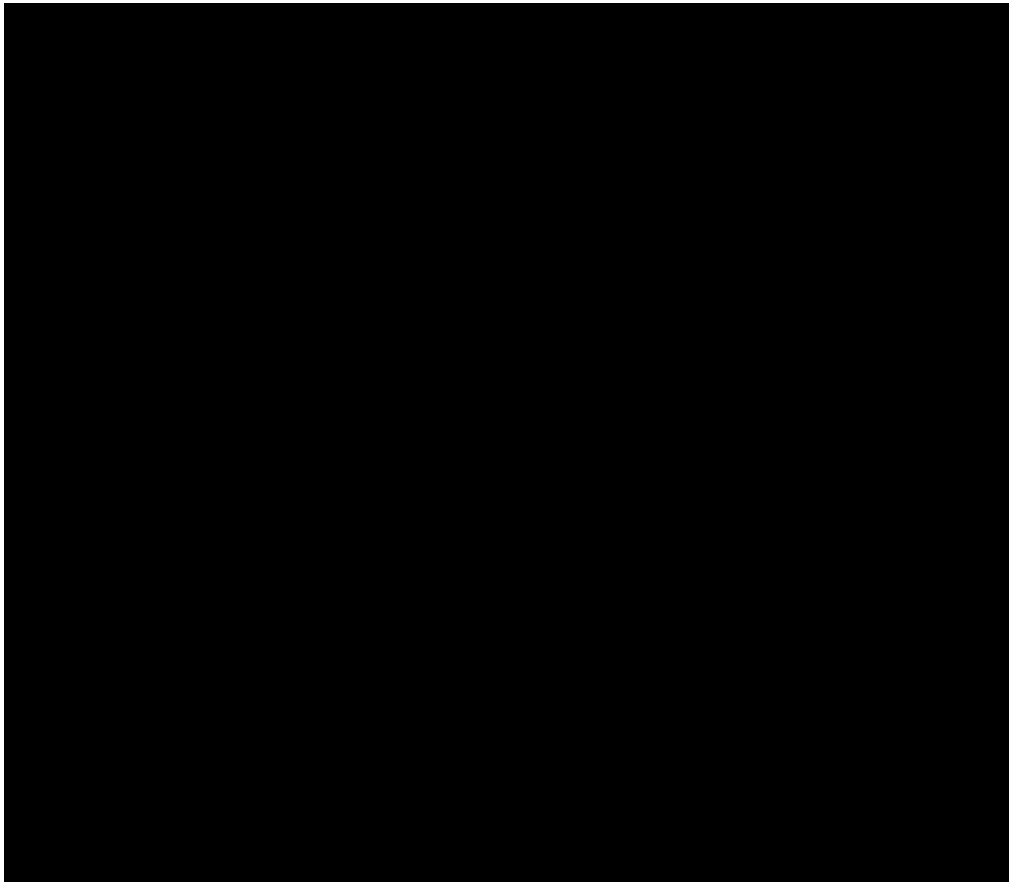
[REDACTED] Due to the steep terrain, with slopes of between 3% and 15%, and the large volume of debris that the channel carried, the rate of runoff was high and strongly erosive to the channel, worsening the wear and tear on the structure, especially during heavy rains.

According to the PMDP and information gathered at the site, the situation described in the previous paragraph was worse in the targeted area because the storm line ran very close to the buildings and away from the midline of the road, putting the buildings and residents at considerable risk, especially during the rainy season. In addition, technical studies showed that the line was in very poor condition and needed to be repaired and/or replaced. There are cases in La Paz of nearby dwellings that were at the point of collapse and of recurring sinkholes in the road, due to the poor condition of the old line.

Given these precedents, the project [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] was extremely important, both for this neighborhood and the city as a whole.

In order to mitigate the negative impact of the project on the locals, the project was divided [REDACTED]

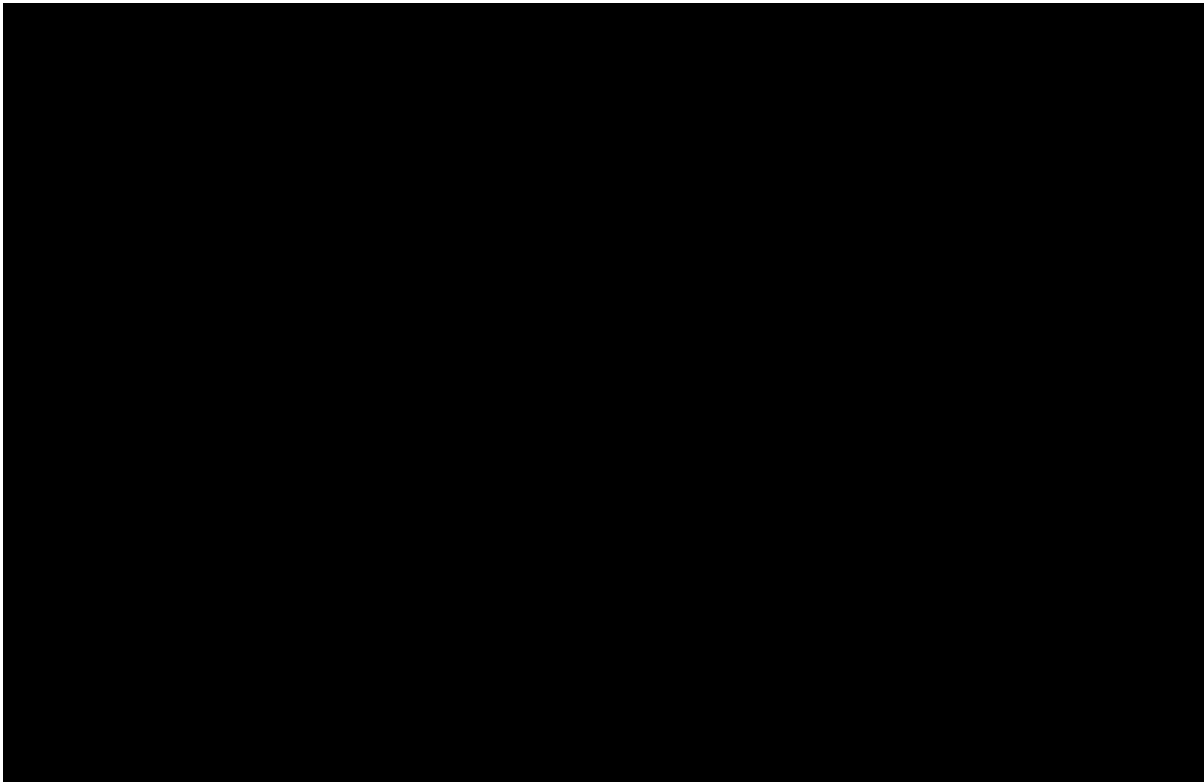
- [REDACTED]
- [REDACTED]
- [REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] All contract timelines were met and explained to the locals

at the time, including the operation to pave this intersection, which was not part of the project financed by the Bank.

As illustrated in the following image, the section where the requester's business is located, due to its position [REDACTED] was never completely without vehicular access. [REDACTED]



Lastly, it should be noted that in the vicinity of the intervention, [REDACTED] [REDACTED], there are roughly 330 businesses, of all kinds. Of the approximately 100 that were in the project area—[REDACTED] [REDACTED]—there were no other complaints or grievances during project execution aside from the one made by the requester.

II. Compliance with Bank policies

a. In relation to compliance with the Environment and Safeguards Compliance Policy (OP-703) concerning the evaluation and mitigation of impacts.

During program preparation, in compliance with the provisions of the Environment and Safeguards Compliance Policy (OP-703) concerning the evaluation and mitigation of impacts at the program level, an Environmental Analysis and corresponding Environmental and Social Management Plan (ESMP) were prepared in line with OP-703 and identified potential impacts and the respective mitigation measures. As indicated below, during execution, in compliance with environmental laws and regulations and the Bank's policies, the corresponding environmental case file was assembled and submitted to the competent environmental authority at the department level, which issued a "CAT III" classification. The Prevention and Mitigation Program and

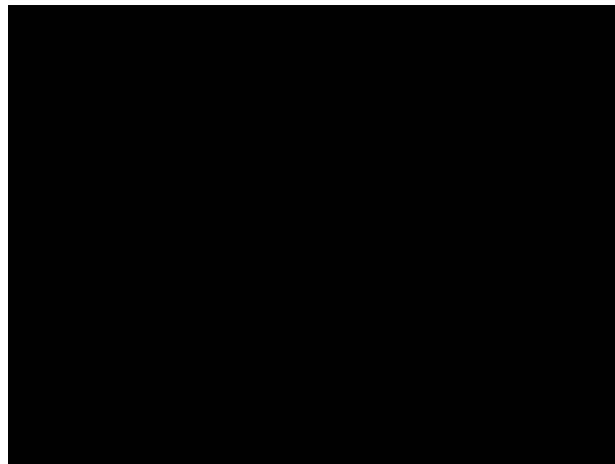
Environmental Monitoring and Enforcement Plan (PPM-PASA) that was prepared in line with that classification identified potential positive and negative impacts that could materialize during execution, operation, and maintenance.

The project execution unit, through the supervision firm engaged for the purpose, and the municipio's works inspectors complied with the environmental provisions approved by the competent environmental authority at the departmental level and with the Bank's environmental safeguards, reporting periodically on the advances made and actions taken in identifying possible negative environmental impacts during the construction process.

In addition, the Bank, through the sector specialist in Bolivia, conducted periodic visits to the project site in order to verify progress and compliance with the environmental policies and technical specifications for the works. To support this monitoring effort, a consultant was hired to assist. The respective site visit reports have been archived in the Bank files for the operation.

b. In relation to compliance with the Environment and Safeguards Compliance Policy (OP-703) concerning public consultation and citizen participation.

The PEU, in coordination with the GAMLP agencies with administrative responsibility for the zone—in this case, [REDACTED]—held meetings to provide information on project execution, scope, and benefits. The beneficiaries indicated their consent to the project, considering the short-, medium-, and long-term benefits that the project would bring to them. The GAMLP has documentation on file attesting to the fact that these meetings were held.

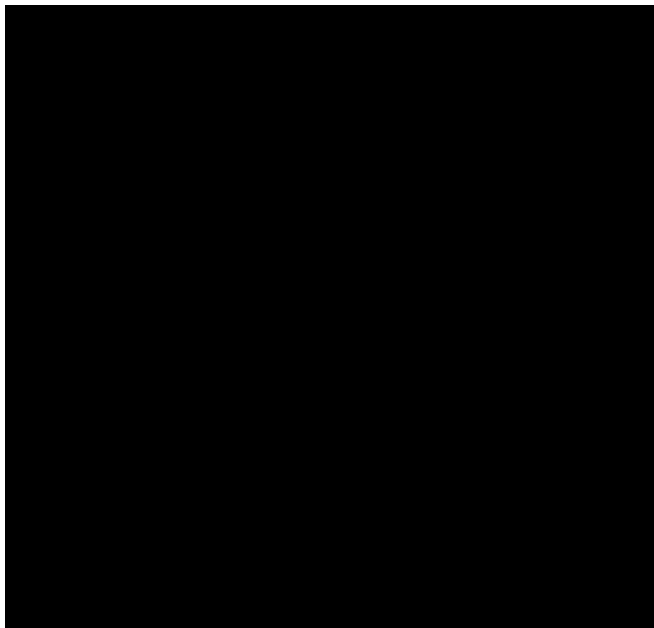


In addition, prior to Bank approval of the operation, the GAMLP convened meetings with the main representatives of the general public. [REDACTED] a public consultation was held to discuss the Environmental Analysis and corresponding ESMP for the program. The reports were made available on the websites of both the GAMLP and the Bank in August 2010.

The ESMP for the program Drainage in the Municipios of La Paz and El Alto contains preventive and corrective measures for projects with minimal impact on the environment, in accordance with Bolivia's Environmental Law (No. 1,333) and Regulations for Environmental Control and Prevention. The ESMP also complies with the Bank's operational policy OP-703, which stipulates that all Bank-financed projects should take into account environmental aspects and adopt suitable measures to avoid adverse impacts to the environment, with due attention given to the economic and social costs and benefits.

It should be noted that any citizen who had a complaint or problem concerning this project or any issue in the municipal jurisdiction had the opportunity to register it at the municipal offices and track its progress online or at the offices. According to information provided by the GAMLP, no complaints concerning the project were received from any locals via this mechanism.

c. In relation to compliance with the Access to Information Policy (OP-102) and the Environment and Safeguards Compliance Policy (OP-703).



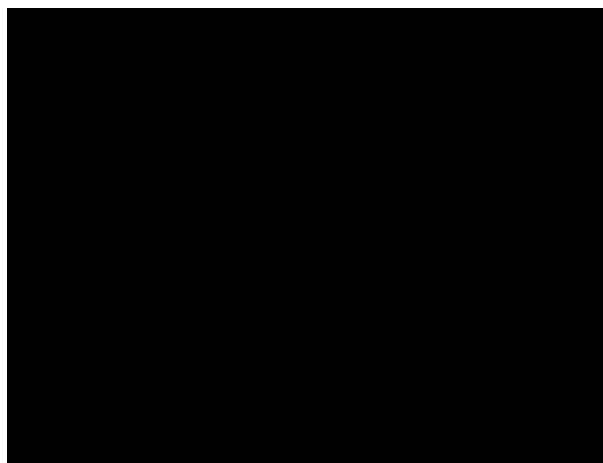
Two information meetings were held at which concerns and questions from the community were addressed: the first on [REDACTED], prior to the start of works, with [REDACTED] in attendance, to report on the scope of the project, execution modality, and timelines; and the second on [REDACTED], immediately prior to the road closures, with [REDACTED] in attendance, to report on physical progress, adjustments to the timeline, and the implementation of road closures. The GAMLP has minutes on file for both meetings.

It is important to note that the call for bids for the project was published through the government procurement system (SICOES) and disseminated in

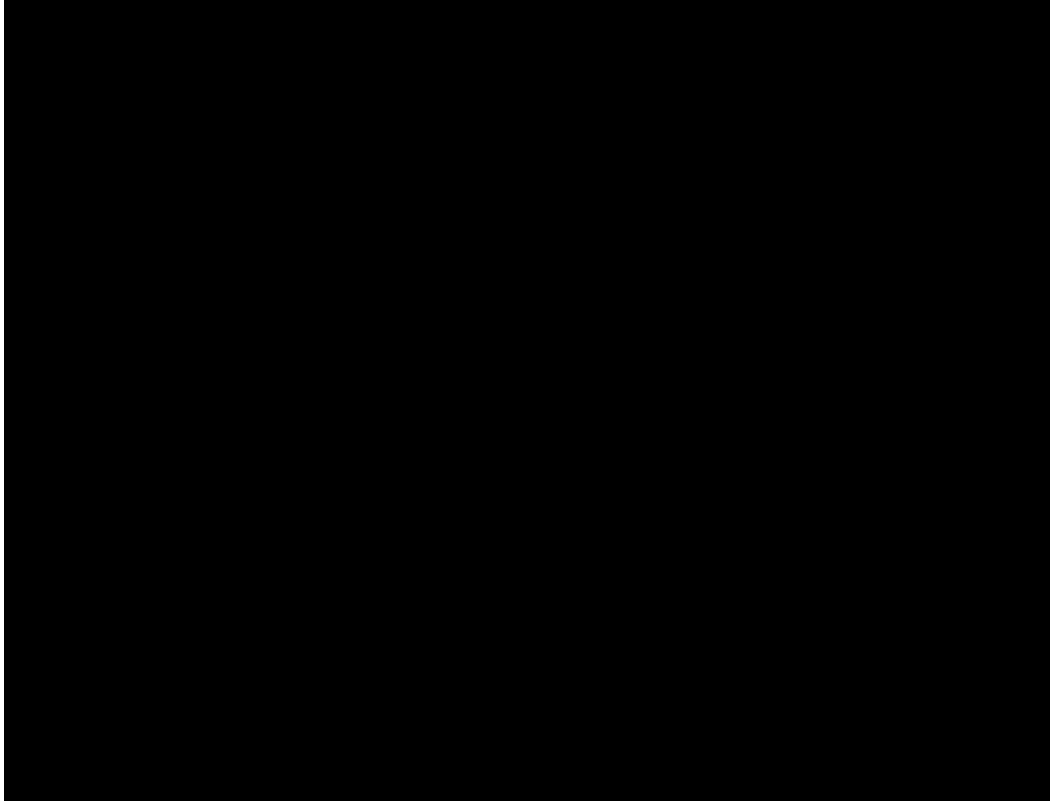
the national press, with program background and project-specific information provided, such as: scope, amount, work volumes, plans, and execution timelines. This information was made available to the general public for consultation.

In addition, at the work site, billboards explaining the drainage program were mounted specifically for the project.

The videos at the following links show clips from the campaign that the GAMLP ran in the mini-program “Las cosas claras para La Paz,” which was televised on several channels at peak viewing hours in La Paz:



- [REDACTED]
- [REDACTED]



III. Responses to the ICIM questionnaire

Following are the responses to the ICIM questions concerning the identification, evaluation, and mitigation of impacts:

- a. **In the design and execution of the culvert works on [REDACTED], were potential negative socioeconomic impacts that the works might have on local businesses as a result of the [REDACTED] closure identified and evaluated in compliance with both operational policy OP-703 and national laws and regulations?**

As part of the project studies and in compliance with environmental laws and regulations and the Bank's policies, the corresponding environmental case file was assembled and submitted to the competent environmental authority at the department level, which issued a "CAT III" classification. The Prevention and Mitigation Program and Environmental Monitoring and Enforcement Plan (PPM-PASA) that was prepared in line with that classification identified the possible positive and negative impacts that the project could generate during execution, operation, and maintenance.

During execution, the consulting firm responsible for supervising the works had personnel who worked exclusively on enforcing compliance with the PPM-PASA and also issued monthly reports to the GAMLP inspectors, which are on file for review as needed.

The following are the main mitigation measures that were identified:

- Strict measures were adopted to prevent damage to local basic infrastructure such as power lines, water systems, sanitary and storm sewer systems, telephone lines, etc.
- A special team was on hand that was prepared to act in the case of contingencies during construction of the works.
- At startup, the contractor responsible for executing the works provided the environmental supervisor with a detailed plan of the roads that would be used to gain access to the works. The selected routes would avoid, to the extent possible, schools, hospitals, churches, and recreational fields, to minimize disturbance to the local community.
- Once the plan mapping out the routes to be used by the contractor was approved, it could not be modified, and the contractor's employees were compelled to respect the established routing and schedules.
- The schedule of road openings and closures was planned to make it as easy as possible to get to businesses and residences.
- Access roads to the project site were kept free and clear during and after construction, allowing for use of adjacent streets and avenues.
- Construction was scheduled in observance of hours of rest for local residents, with work causing noise disturbances suspended between 22:00 and 06:00.
- Pedestrians and others not involved in the construction work were restricted from entering the work sites, in order to prevent accidents. To this end, the contractor erected fences and barriers around the work sites.
- The contractor prepared contingency plans to identify the steps that should be taken in the case of accidents and/or emergencies.
- The contractor was required to have back-up alarms on vehicles, to prevent accidents.
- Leaving materials or waste near the entrances to houses or businesses in the neighborhood was strictly prohibited.

b. Were measures taken to avoid, minimize, compensate, and/or mitigate the negative socioeconomic impacts on local businesses?

Yes, the measures described below were taken:

Project preparation stage: Meetings were held to discuss the project in terms of the various benefits and possible impacts so preparations could be made for the temporary road closures, and to explain the positive post-execution impacts for the neighborhood. GAMLP authorities representing the district attended these meetings.

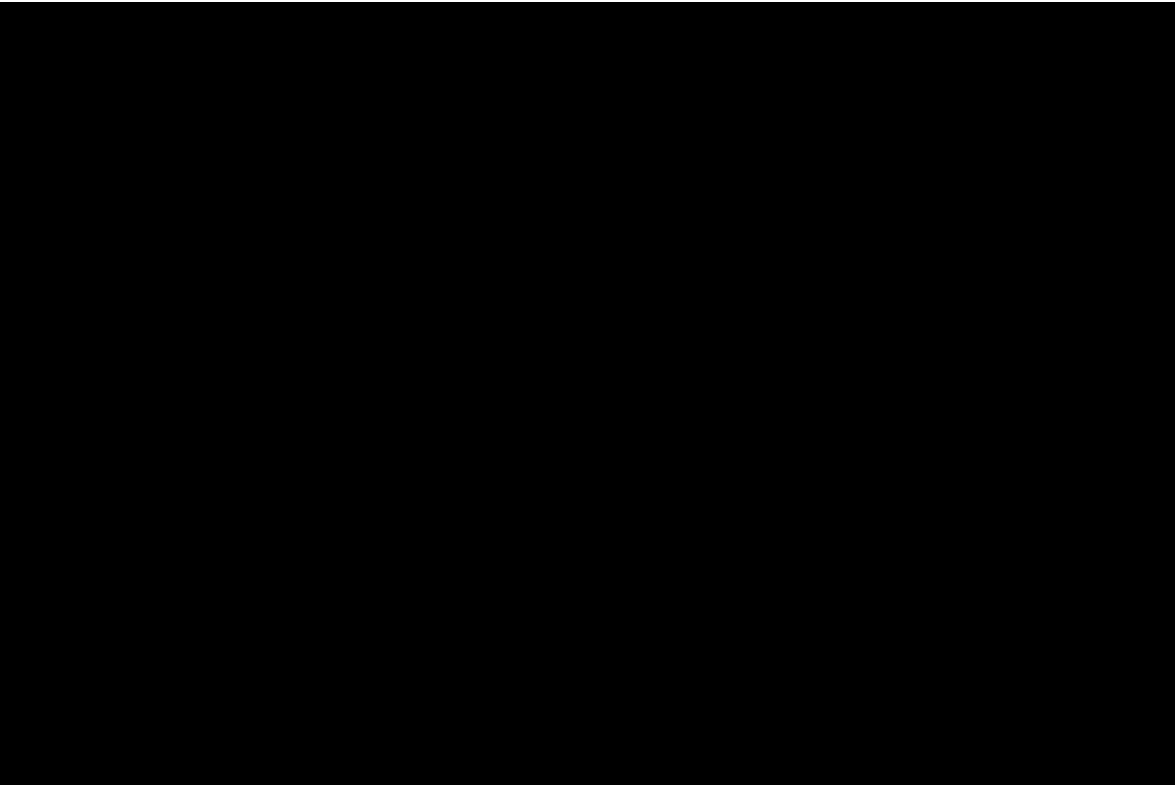
Project execution stage: The precautionary step was taken of programming the physical intervention by sections to minimize negative impacts during construction. Pedestrian walkways were set up along the shoulders (sidewalks) to allow for continuous access and enable businesses to remain open. Cross-streets were opened so they could be used temporarily for customers. In addition, road intersections were kept open during 80% of the execution period to minimize the impact on vehicular traffic and business operations.

c. Was there a framework in place to supervise any social risks and impacts that materialized during execution of the works?

Yes. As part of the procedures established for implementation of the project, a PPM-PASA was implemented by the environmental specialists employed from the construction firm, the works supervision firm, and the execution unit's environmental inspector. This document was approved by the competent environmental authority at the departmental level, so there was ongoing supervision by GAMLP agencies and the Government of the Department of La Paz (GADLP).

d. If not, was harm caused to the requester?

There was no harm to the requester. The impacts were minor and short-lived, and on the contrary, the project met its objective, which was to ensure the proper drainage of storm water, protecting residences in the targeted area and by extension the well-being of the inhabitants. Moreover, as a positive externality of the project, the road was resurfaced with asphalt by the GAMLP, improving the quality of life of the local residents, including the requester.



In addition, the requester was one of the least affected of the more than 100 businesses in the area, [REDACTED]

[REDACTED]

Concerning citizen participation and consultation processes:

- a. Were adequate and participatory consultation processes held with the people in the area affected by the works? Were business owners in the area affected by the works included in those processes?**

Yes. Dissemination processes were held before and during the project, including meetings that were attended by homeowners and leaseholders that run businesses in the area. These dissemination activities involved the participation of GAMLP authorities and sector representatives, and there is supporting documentation.

- b. During the consultation processes, was information provided in accordance with the requirements of operational policy OP-703?**

Operational policy OP-703 establishes:

“For Category ‘B’ operations, affected parties must be consulted at least once, preferably during the preparation or review of the ESMP, as agreed with the borrower. For consultation purposes, appropriate information will be provided in location(s), format(s) and language(s) to allow for affected parties to be meaningfully consulted, to form an opinion and to comment on the proposed course of action.”

The project dissemination meetings included all the information on the type of works, investment amounts, timelines, and scope of execution, and the Storm Drainage Program was responsible for the hydraulic works in all cases. It was also announced that complementary works, such as the road resurfacing, would be coordinated by other GAMLP agencies.

- c. If consultation and information processes did not proceed in accordance with operational policy OP-703, was harm caused to the requester?**

As indicated, the consultation and information process proceeded in accordance with operational policy OP-703. It is worth reiterating that [REDACTED]

[REDACTED] the requester had uninterrupted access via the other street such that there was virtually no impact on him during execution of the works.

Concerning access to information on the project:

- a. Was program information available to the public and interested parties in accordance with the rules established in operational policy OP-102 and in relation to operational policy OP-703?**

It is important to note that the specific project [REDACTED], as part of the program, included a public call for bids, for which notices were placed in the local press and via the government procurement system (SICOES). This notice included detailed information on the program such as the amount of the loan contract, effective dates, and specific information on the project, including the work volumes to be contracted, scope of the project to be executed, technical specifications, work plans, and estimated execution time. In addition, [REDACTED] were erected, indicating execution times, financing sources, construction firm, works supervision, works inspector, etc. Lastly, the GAMLP posted periodic reports on this and other municipal projects through its website and on microprograms broadcast on local television channels.

IV. Conclusions

- Having conducted an in-depth review of the requester's complaint and the information on the program and the project specifically, we believe that the Bank's Management has complied with the environmental and access to information policies applicable to the project.
- We believe that in the execution of this project, all measures were taken to keep negative impacts to a minimum during construction of the works. Specifically, the requester was among the least affected due to the fact that [REDACTED], which meant that there was access at all times.
- The project objectives were fully met within the established timelines, to the benefit of all residents in the area, including the requester, by providing a safe drainage system and eliminating the possibility that roads and buildings in the area might collapse.
- The project generated a positive externality, inasmuch as the GAMLP decided to pave the road once the hydraulic works were completed, which improved mobility in the area and quality of life for the locals.
- At the recommendation of the ICIM, Management held a meeting with the requester to hear the claims and explanations as to why the requester felt impacted by execution of the works. Management offered a detailed explanation to the requester of compliance of the Bank policies applicable to the project.

COMMENTS ON THE “RECOMMENDATION FOR A COMPLIANCE REVIEW AND TERMS OF REFERENCE”

Following are comments on the preliminary version of the “Recommendation for a Compliance Review and Terms of Reference” for the program Drainage in the Municipios of La Paz and El Alto (BO-L1028), received on 19 January 2016:

1. In paragraph 3.3, it says, “... [REDACTED]
[REDACTED]
[REDACTED] We believe that it would be a good idea to verify this type of assertion linking a meeting with the Bank’s team at the Country Office in Bolivia with the event involving the dumping of dirt.
2. In paragraph 3.5, it says, “at no point then was it reported that the work was being financed by the IDB, there was no transparent information or simple documentation.” It must be noted that in addition to the call for bids that was published in the national press, which clearly mentioned the source of financing, from the start of the work, a [REDACTED] from the requester’s business, there was a large billboard describing the specifics of the work, including those of the financing source, which in this case was the IDB.
3. In addition to the information provided in paragraph 4.5, reports on all visits made by the sector specialist and the consultant hired by the Bank are on file in the Bank’s systems, where the monitoring and supervision carried out by Management can be verified.
4. It must also be clarified in paragraph 4.7 that the contractual timeline was 270 days and that the five months refers to the period of time that one of the streets where the requester’s business is located was affected.
5. In paragraph 6.6, it says, “...he alleges that there were substantial negative impacts on his business when [REDACTED] where it is located was closed for a longer period than notified, blocking customer access.” It must be reiterated that vehicular access to his business was never completely blocked, given that the business [REDACTED]
[REDACTED] It should also be clarified that the [REDACTED] was closed during the reported period, since this period is apparently being confused with the total execution period for the project. The suggestion is to include, as part of the terms of reference, verification of the requester’s activities prior to the project and from immediately after the street was paved to the present date.
6. In paragraph 6.8, it says, “It can be deduced from some of the documents that the type of impacts mentioned by the requester would have been brought to the attention of the authorities at information meetings with local business owners.” The suggestion is to verify which documents this refers to.
7. In paragraph 6.12, it says, “the requester alleges that the information that he was provided on the works was not correct, that it was presented as an imposition not as a consultation, and that had he known in advance how long the work would actually take, he would have taken steps to prevent the extended [REDACTED] closure from affecting him as he claims it did.” It must be clarified that there is evidence that the GAMLP announced the timelines for the project and period of closure.

8. In paragraph 6.18, it says: “The requester claims that he did not have access to simple, transparent information, nor was he aware that the program was financed by the IDB, and had he known that the IDB was financing it, he would have appealed earlier for assistance.” It must be noted that in addition to the call for bids that was published in the national press, which clearly mentioned the source of financing, from the start of the work, [REDACTED], there was a large billboard describing the specifics of the work, including those of the financing source, which in this case was the IDB.
9. We also recommend supplementing the purpose of the investigation given that it is important to identify impacts at the time of the project and the situation once it is completed, when those impacts become positive and beneficial for the community, including the requester.
10. The suggestion is to clarify in paragraph 6.25(a) that the socioeconomic evaluation of the project considers harm avoided with the project.
11. We recommend including in paragraph 6.29 the names of the municipal officials responsible for program execution.

**REQUESTER'S COMMENTS ON THE ON THE PRELIMINARY VERSION OF THE
RECOMMENDATION FOR A COMPLIANCE REVIEW**

From: [REDACTED]
Sent: Monday, January 25, 2016 11:54 AM
To: Villanueva Hermida, Maria Aranzazu
Subject: Re: MICI-BO-2014-0079. Borrador de Recomendación para una Verificación de la Observancia y
Términos de Referencia para comentarios

Buena. Día
Ya revise el documento que me enviaron
Y estoy de acuerdo
Pero mi daño económico va mas del 20%
Los vecinos no sabían que podían acudir al BID
Y la obra se fue alargando

From: [redacted]
Sent: Monday, January 25, 2016 11:54 AM
To: Villanueva Hermida, Maria Aranzazu
Subject: Re: MICI-BO-2014-0079. Draft recommendation for a compliance review and
terms of reference for comment

Good day.
I have reviewed the document that you sent to me.
And I agree
But my economic damages went beyond 20%
The locals did not know that they could approach the IDB
And the project went on longer and longer.