

**Montenegro:
Main Roads Reconstruction
Project
M-2 Tivat-Jaz Road Section**

Consultation Report

Prepared for: European Bank of
Reconstruction and Development

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1 Introduction

The European Bank of Reconstruction and Development (EBRD) is considering providing finance to the Transport Administration (TA) of Montenegro to finance the rehabilitation and upgrade, and works supervision, of a 16 km section of the M-2 road between Tivat and Jaz in the south west of the country ("the Project").

Given the scale and nature of the Project, EBRD has assigned the Project to Category A under its Environmental and Social Policy 2014. As such a comprehensive Environmental and Social Impact Assessment (ESIA) was required, followed by public disclosure of the ESIA for a minimum of 120 days. The disclosure period ran from 7 August – 5 December 2020.

Following the completion of the disclosure period, this Consultation Report collates and summarises the engagement activities that have been undertaken for the Project since the early design phase in Spring 2016, including those undertaken as part of both the National EIA and the International ESIA processes.

2 Purpose and structure of this Consultation Report

Information for this report has been drawn from a number of sources, including input to and implementation of the Project Stakeholder Engagement Plan (SEP) and Land Acquisition and Resettlement Plan (LARP). The information includes, but is not restricted to feedback from interviews with, and letters from, interested parties to the Transport Administration ('TA' - the Client) and the EBRD, as well as the associated responses. The specific sources of information are outlined further in this report.

Engagement activities undertaken prior to the International ESIA disclosure period are further detailed in the SEP, a summary of which is included in Appendix 1 of this report, (including issues raised and their resolution).

The principal focus of this report therefore is the engagement activities undertaken since early 2020, and in particular the adaptive actions taken due to the Covid-19 pandemic restrictions, to ensure that project affected people and parties have been fully informed about the Project and have been given the opportunity to comment.

The legal and policy framework governing requirements for stakeholder engagement has been set out in the SEP and is not repeated here with the exception of the EBRD Briefing Note on Stakeholder Engagement (15 April 2020), which provided guidance on adapting information disclosure and stakeholder engagement mechanisms during the COVID-19 crisis and which is considered in section 3 below.

3 EBRD Briefing Note on Stakeholder Engagement

The briefing note emphasises the importance of information disclosure and stakeholder engagement in managing the social impacts of projects and that mandatory restrictions and social distancing measures imposed by COVID-19 will rule out some traditional consultation approaches in the short term. A number of alternative approaches are proposed including:

Information disclosure:	<ul style="list-style-type: none"> • Leaflets • Email campaigns • Text-based messaging • Traditional media • Engagement through local actors • Signage
Stakeholder engagement:	<ul style="list-style-type: none"> • Surveys and questionnaires • Online engagement • Social media • Radio call-in shows / telephone engagement

Appropriate approaches from the list were applied to the disclosure and engagement measures for the Project via the updated SEP (see Section 4) and in agreement with the TA and EBRD.

4 Proposed engagement activities during the disclosure period as set out in the SEP

The proposed engagement activities for the disclosure period are set out in Table 6 of the SEP and summarised below. The mechanisms sought to maximise opportunities for engagement, whilst recognising the significant restrictions imposed by COVID-19.

Information disclosure:	<ul style="list-style-type: none"> • The full ESIA disclosure package was posted on the websites of the municipalities of Budva, Kotor and Tivat and on the website of the TA itself. • Five hard (printed) copies of the ESIA packages, as well as 20 copies of the non-technical summary of the ESIA were available at the Budva, Kotor and Tivat municipality offices, and the Radanovici and Lastva Grbaljska community offices. • The ESIA package was available on five USB sticks so interested parties could take the documents away to review at their leisure, at the five locations above. • Announcements were made on Budva, Kotor and Tivat local radio stations. • Advertisements were placed in the Budva, Kotor and Tivat local newspapers. • Posters were distributed on local information boards and suitable physical infrastructure.
Stakeholder engagement:	<p>At the time the SEP was written, it was hoped that COVID-19 restrictions would be eased so that traditional engagement methods would still be possible at some point during the disclosure period. The SEP also included a provision that if public meetings were still not allowed by day 60 of the 120 day disclosure period an alternative approach would be implemented. This</p>

	would include phone, email or online surveys with the communities of Radanovici, Prijedor and Lastva Grbaljska and with Radanovici School (e.g. to develop a road health and safety campaign).
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5 Amendments to the engagement activities during the disclosure period

No comments were received during the first eight weeks of the disclosure period. Whilst traditional engagement methods were still not possible, further (telephone) surveys had already been planned to provide additional information for the LARP. These used contact details previously collected during the socio-economic studies of the International ESIA process. The survey was also announced in advance through notices at 26 locations along the route, see Figure 1.



Figure 1: LARP census survey announcement posted on the side of a local bus shelter along the route

To avoid confusion arising from too many separate engagement exercises, a proactive approach was taken during the LARP process whereby surveyors undertaking the LARP interviews used an introductory script at the start of their telephone call to raise awareness of disclosure. The script (see Appendix 2), included specific reference to the disclosure period and locations where the disclosure documents could be viewed.

Some elements of disclosure still remain to be completed as a result of the ongoing Covid restrictions. In particular further specific engagement activities are still to be held with Radanovici School, and surveys with the communities of Radanovici, Prijedor and Lastva Grbaljska were restricted to those households and businesses most significantly affected which were contacted as part of the LARP interviews.

6 Summary of responses received during the disclosure period

Excluding the planned interviews undertaken as part of the LARP process only a limited number of responses were received as summarised below:

- No comments were received through the TA or municipality websites.

- Data on the number of paper copies of the non-technical summary and electronic copies of the ESIA package collected from the five locations is still awaited. However, the TA has confirmed that no additional copies were requested.
- One letter was received from the Department of Natural Protection and Cultural Resources of Kotor Municipality
- One letter, signed by nine people, was received from residents of Lastva Grbaljska
- Of a total sample of 98 households and 73 businesses for the LARP, 61 household and 62 business surveys were completed.

Key issues raised by stakeholders during the LARP survey, and in the letters received are as follows:

- The design, namely four lanes, with a central median and pavements either side, was considered inappropriate, namely too wide
- The road is too close to existing buildings
- The road should be moved so there is no need for demolition of structures
- Adverse effects on businesses due to restricted access, loss of parking etc
- Further information is needed on location and number of animal passages
- Detailed comments on cross-referencing within the ESIA

Of the households surveyed in November 2020, there was no clear consensus in response to the question concerning how the respondent considered the project would affect them although answers generally concerned loss of land / access, noise and disruption. It should be recognised that it is often far harder for stakeholders to express their views when questioned on a one-to-one basis than when in an open forum such as a public meeting. Although 75% of the business respondents confirmed that they had been informed about the expropriation process and a small number (6%) made a voluntary reference to the media and television adverts about the Project, demonstrating that these mechanisms had been successful in reaching their target audience, there were several who considered that they were still poorly informed about the expropriation process.

7 Local context

Parliamentary elections were held on August 30th 2020 and led to a replacement of the ruling party, which had been in power for 30 years, by a coalition of former opposition parties. A protracted legal process and negotiations followed, whereby MPs, ministers and other representatives of national authorities were officially elected on December 4th 2020 changes at a local level to the authorities in Budva, Kotor and Tivat, are ongoing.

National and local government has been substantially constrained by the COVID-19 pandemic which, coupled with the elections, may have impeded the efficiency of communication and operation of local and national authorities; There has been a number of political processes in Montenegro in the previous period, which could have also contributed to lower degree of engagement of the local population during the disclosure period.

8 Key issues raised by all stakeholders

Appendix 1 contains a summary of engagement activities and meetings undertaken prior to the disclosure period and associated responses / actions from the TA. Appendix 3 contains comments received from all stakeholders during the ESIA process.

With the exception of the detailed, specific comments on the disclosure package documents raised by the Kotor Municipality Department of Natural Protection and Cultural Resources, the majority of comments (and associated TA responses) can be grouped into the following categories:

Issue	Detail	TA Response
Road design	Concerns raised include the location of roundabouts, underpasses, and crossings for both people and livestock, the central reservation between the lanes, and requests to narrow the road to 3 lanes instead of 4 in certain areas.	The design has been amended to incorporate requests where practical. Some issues could not be accommodated for safety / operational reasons.
Road safety	Concerns include increases in traffic volume and speed as a result of the Project, particular in the vicinity of Radanovici school.	The design complies with international road safety standards. Further engagement activities will be undertaken, particularly with Radanovici School.
General environmental	Comments have been raised relating to noise, traffic, impacts on local flora and fauna and flooding.	These issues have been addressed in the ESIA with actions carried forward to the ESMP.
Land ownership / acquisition / expropriation	Concerns have been raised relating to land ownership, disparities between the national and local spatial plans and the expropriation process throughout the life of the Project.	These issues are being addressed through the expropriation process.
Business impacts	Local businesses have raised concerns about potential adverse impacts due to restricted access, loss of land and disruption during construction.	The TA has confirmed that access will not be restricted. Other specific issues are being addressed through the expropriation process as appropriate.

9 Summary

Stakeholder engagement has been ongoing since 2016 in relation to the Project and has included meetings with community groups, local municipalities and councils, local businesses and schools and community facilities. Formal engagement activities in support of the national EIA and the supplementary ESIA were undertaken in Winter 2019 – Spring 2020.

Following a number of community comments and concerns, the design was significantly altered in 2017 to incorporate changes with respect to lane width, additional roundabouts, locations of bus stops etc.

Very few voluntary comments were received during the disclosure period. This may be because changes to the design had addressed the majority of concerns, or the extended Project development phase over the last four years, coupled with the significant political changes in Montenegro, which

coincided almost exactly with the disclosure period, may have led to fatigue with the engagement process.

It is possible that the revised methods of engagement due to COVID-19 may also have had less success than usual in reaching the target audience, although high numbers of those surveyed in November, particularly businesses, confirmed that they had been informed about the expropriation process and several referred to the media advertisements, which would tend to indicate that methods had been successful and rather, that stakeholders were not minded to comment on the Project.

However, despite the ongoing engagement (including the socio-economic surveys and associated key informant interviews, focus group discussions and community meetings undertaken as part of the ESIA in Spring 2020), the November surveys indicated that approximately 45%, particularly households still perceive themselves to be poorly informed with respect to the expropriation process, despite the meetings and media presence. There is therefore a need for ongoing engagement in this respect.

Finally, two specific engagement activities included in the SEP have not yet taken place due to COVID-19 restrictions. These are the specific discussions with Radanovici School to develop a road health and safety campaign and the surveys with the wider communities of Radanovici, Prijevor and Lastva Grbaljska. These activities should be progressed at an appropriate time, once it is safe to do so.

Appendices

Appendix 1: Summary including general issues raised during stakeholder engagement

Summary of engagement activities

This section summarises engagement undertaken prior to disclosure and is drawn from section 5.3 of the SEP.

Engagement during the Design phase

The TA has been engaging with project stakeholders since 2016, and over 48 meetings and official communication with representatives of the relevant municipalities, public utility companies, local communities and business entities were undertaken from 2016 until 2019 (i.e. during the design and revision phase). Stakeholder engagement has been ongoing since submission of the planning documentation for development of the Preliminary Design, which was delivered to Municipality Budva in 2016. After finalisation of the Preliminary Design, the TA presented the suggested road layout to all three municipalities during 2016. The initial stage of stakeholder engagement included meeting with representatives of all three municipalities traversed by the road, i.e. Budva, Kotor and Tivat. Additionally, representatives of the Local Community Lastva Grbaljska were officially informed about the stage of development of the Preliminary Design during 2016. The Preliminary Design was submitted to the relevant municipalities in 2017 for the purpose of approval of the road layout.

During 2017, stakeholder engagement included a number of meetings and official communication with representatives of the affected municipalities and local communities, whereby the representatives of the local communities expressed their requests regarding the Preliminary Design and road layout. The requests which were made by the local communities during this phase were shared with representatives of the municipalities, for the purpose of ensuring duly and conformant development and update of the Preliminary Design.

During the stage of development of the Preliminary Design, representatives of the local communities submitted a petition in 2018, through which they expressed disagreement with construction of the Tivat-Jaz Main Road, and requested a number of changes to the Preliminary Design so that the Project itself would allow them to have better and more efficient conditions for their everyday activities. The petition was subsequently submitted to the EBRD, and some of the requests made through the petition were related to reduction of the width of traffic lanes, reduction of the width of the separating island and construction of additional roundabouts. Additionally, the TA received requests for amendments from representatives of business entities in Lastva Grbaljska, who opposed the requests which were defined in the petition signed by the representatives of the local communities. Business entities submitted their requests during 2018, whereby one specific business entity opposed construction of a roundabout at one of the intersections at which the local communities had already requested an additional roundabout through the Petition. The TA provided official responses to the Petition and all requests made by the local communities and business entities throughout the Design Phase.

Additional stakeholder engagement that was carried out by the TA on an ongoing basis during the Design phase included official communication and meetings with representatives of the public utility companies. These meetings were held for the purpose of aligning the Project Design with all the activities and projects which would be implemented by the public utilities companies in the upcoming period, as well as during the phase of reconstruction and upgrade of the Tivat-Jaz road section, i.e.

any projects related to public water supply, public electricity supply, etc. As a result of these meetings, the TA was provided with information about the existing locations and capacities of the public utility companies, such as the current capacities and locations of substations in the Project Affected Area. Considering the fact that this project is going to be implemented along with the project of construction and reconstruction of the Regional Water Supply System, the TA maintained continuous communication and engagement with representatives of the Regional Water Supply Company throughout the Design phase.

The TA as the main Project proponent has met with local community stakeholders throughout this period in order to ensure that community feedback, concerns and suggestions have been noted and taken into account in the finalisation of the design. Engagement during this phase has not been systemically recorded, the methods of communication have been varied (including telephone calls), and the TA continues to meet and hear stakeholder queries and concerns. A selection of key meetings has been included in the Table below (Table 4 in the SEP), and further details are included in Annex 2 of the SEP provided by the TA.

Engagement during the EIA phase

The EIA process commenced in 2019. Engagement during this phase included four (4) public consultation meetings in Radanovici, and Budva, Kotor and Tivat municipalities in December 2019, where the draft EIA report was disclosed. In addition, there were four (4) public announcements (on the NEPA's website and in the national newspaper) about the process of development of the EIA. These announcements were related to the following stages of development of EIA: 1. Request for development of EIA; 2. Decision on development of EIA; 3. Announcement about completion of the EIA; 4. Announcement about the public consultation meetings for the purpose of presentation of EIA.

Engagement during the ESIA Scoping phase

A team of international consultants was contracted in November 2019 to ensure that the impact assessment process for the Project would follow EBRD Environmental and Social Standards in addition to the Montenegrin national standards in accordance with which the EIA had been completed. The ESIA team visited the PAA 2-6 December 2019, and engaged with representatives of Tivat and Kotor municipalities, and representatives from Radanovici and Lastva Grbaljska communities, in order to ensure that key stakeholders were aware of the parallel EIA and ESIA processes. Budva municipality was also contacted with a request for a meeting, however no response was received.

Engagement during the ESIA Study phase

The EIA and ESIA processes have been undertaken in parallel. The ESIA study phase consisted of 13 meetings with key informants, one focus group discussion with youth from Radanovici school, one community meeting in Radanovici, and one-to-one interviews with 98 households and 72 businesses in the PAA (see Table 4 of the SEP). In addition, ahead of the household and business surveys, the consultants posted information notices in locations in the PAA informing local residents about the Project and the ESIA process, and sent information notices out by email to all businesses operating in the area. Furthermore, every respondent to the survey questionnaire was given a leaflet explaining the process as reference material to ensure that they were fully informed. The announcements of the studies, the leaflets shared, and photographs showing the locations of the posters are included in the Annexes to the SEP.

Stakeholder Summary List

Stakeholder	Role & Connection to Project
National Government	
Transport Administration of Montenegro (TA)	The Montenegrin Transport Directorate used to be part of the Ministry of Transport and Maritime Affairs. In January 2019, its name was changed to the Transport Administration of Montenegro and it became an independent institution responsible for the maintenance and reconstruction of the road network. The TA is under direct supervision of the Government of Montenegro. The TA is the leading institution responsible for the implementation and supervision of the Project, and has issued traffic-technical conditions for development of the Main Design for the Project. The TA is also responsible for communication with the local municipalities, communities and businesses during Project design and construction, public consultation meetings related to environmental and social aspects; coordination with the Contractor and supervision of the engineer during construction period.
Ministry of Transport and Maritime Affairs (MTMA)	Responsible for transport (road, rail, air) and maritime affairs within Montenegro. MTMA is a leading public institution and responsible for the national road upgrades in Montenegro and the TA is the department responsible for its implementation.
Ministry of Sustainable Development and Tourism (MSDT)	Responsible for urban planning, construction and environmental aspects of project development. MSDT is the agency responsible for providing construction permits on the request of the TA and for monitoring the Project's compliance with these permits through their Construction inspection.
Nature and Environmental Protection Agency (NEPA)	NEPA has overall responsibility related to the EIA process in accordance with the national legislation. NEPA reviews the Environmental Impact Assessment (EIA) reports, organises public consultation meetings, and approves and issues the environmental permits.
Administration for Inspection Affairs (AIA)	AIA is responsible for monitoring the Project's compliance with national environmental legislation. AIA is engaged during the Project construction works, and controls implementation of e.g. environmental inspections.
Real Estate Administration of Montenegro (REA)	Executing agency for the expropriation process, which is implemented in accordance with the national Law on expropriation and the TA's Expropriation Plan. The process includes public consultation meetings with the stakeholders whose land/objects will be subject to land acquisition as per the Project's requirements.
Ministry of Finance	Securing funds for land acquisition. Responsible authority for matters related to land ownership and corresponding compensation which is defined in the process of land expropriation. Its competency in this process is related to the right of owners of expropriated land to file complaints to the Ministry of Finance against the decision on expropriation and the defined amount of compensation. In case the owners do not accept the decision of the Ministry of Finance, they have the right to initiating legal procedure in the competent courts in Montenegro.
Water Directorate	The competent authority for the water permitting process (issuing water use requirements, water use approval, and water use permit), including before

	the construction of new (and reconstruction of existing) facilities and other works for which water conditions are required.
Regional Water Supply Company (RWSC)	The RWSC is separate company in charge for the regional water supply of the Montenegrin coast and other area, that is addressing capture, treatment, transportation and delivery of drinking water from the water source Bolje Sestre through the Regional Water Supply System of the Montenegrin Coast into the water supply networks of the municipalities of Budva, Tivat, Kotor, Herceg Novi, Bar and Ulcinj. RWSC is a limited liability company which was founded by the Government of Montenegro. Regional water supply is regulated by law (Law on Regional Water Supply of the Montenegrin Coastline, “Official Gazette of the Republic of Montenegro”, no. 56/16), whereby the decision on reorganisation of the public enterprise into the limited liability company was determined through the Decision on Establishing the Limited Liability Company “Regional Water Supply Company” (Official Gazette of the Republic of Montenegro, dated 29th November 2017) The RWSC is going to install a new regional water supply system along the section from Budva to Tivat, and this design has been aligned with the Main Design for reconstruction of the Tivat-Jaz road. Construction works on these two developments are going to be carried out at the same time.
Local Government	
Municipalities of Budva, Kotor and Tivat	The Project is located within the territories of Budva, Kotor and Tivat municipalities. All three municipalities will be responsible for landscaping along the sections of the route which belong to their respective administrative units.
Water and Sewer Utility Company, Budva, Kotor and Tivat	According to Article 35 of the Law on Roads (paragraph 1, 3, 4, 6) these institutions are responsible for relocating the existing water and sewage installations, into the roadbed and road belt, if required. These companies are under the control of local municipalities. These institutions have informed the Project officially regarding all existing and planned water supply and sewerage pipes and facilities along the road that could be affected during the reconstruction of the road.
Montenegrin electricity distribution system CEDIS	According to the Law on Roads Article 35 (paragraph 1, 3, 4, 6) this institution is responsible for relocating all electrical installations, which are placed in the roadbed and road belt, if required. This institution has informed the Project regarding existing and planned electrical installations along the Road that could be affected during the reconstruction of the road.
Utility Company, Budva, Kotor and Tivat	These companies are responsible for collecting the waste in the Project Affected Area (PAA), and will be continuously informed of Project developments in particular during the construction phase in order to ensure interrupted access for waste collection trucks.
Touristic organisations, Budva, Kotor and Tivat	Given the importance of tourism for the livelihoods of the area, these stakeholders will be continuously informed of the Project developments so that tourist operators (including bus companies) can plan alternative routes if needed.
Local Community	
Landowners/land users/business owners affected	These stakeholders will be directly affected by land acquisition required for the Project. The Project will cause both physical and economic displacement of some landowners, land users and business owners.

by land acquisition	
Representatives of Radanovici, Gornji Grbalj, Savina, Lastva Grbaljska communities	Representatives of these four Local communities have actively communicated with the TA, the Government, local municipalities and EBRD and their requests have been included where practical in the revised version of the Main Design.
Local people who regularly use the road as part of their livelihood activities	Road users may experience restricted access, or congestion during construction. They will also be the beneficiaries of improved access and connectivity during the operation. Travel times are expected to be reduced and the driving conditions safer.
Radanovici primary school and kindergarten Primary school n Lastva Grbaljska (as a unit of Radanovici school) Arcadia Academy in Radanovici	Children travelling to school need to have uninterrupted access and safe conditions for getting to the Radanovici school and kindergarten, to Lastva Grbaljska school and to Arcadia Academy. The Project will seek to keep the school and kindergarten management, and parents and children informed of Project developments.
Local health facilities	The Project needs to keep the local health facilities including Kotor Hospital, Clinic 'Fidami Medica', Polyclinic 'Hippocrat' and Institute for emergency medical service of Montenegro informed of developments so that they can be adequately prepared.
NGOs, Other Organisations and Individuals	
NGOs	Various NGOs in the area have an interest in issues related to the environment (environmental protection, conservation of natural resources and implementation of the concept of sustainable development). NGOs including, but not limited to: NGO Exeditio (Kotor), NGO 'Ecological centre Delfin' (Kotor), NGO 'Our action' (Kotor) , NGO 'Society for development of ecology' (Budva) NGO 'Green Net' (Budva) NGO "Green Home"(Podgorica) NGO "Ozon" (Niksic) NGO "Association of Egyptians" (working with the Roma population)
Project Workers	Project construction workers are going to be considered as part of the occupational health and safety procedures, and will be provided with a separate grievance mechanism developed and communicated by the contractor.
Businesses	
Local companies which are located along the road	Businesses in the PAA are going to require access to their premises during the construction and operation phases. They are expected to experience impacts related to access to their premises, noise, dust, and pollution – all of which are going to have different levels of impact depending on the type of business activities that the companies perform.
Telecommunication companies (Telekom, Mtel,	According to the Law on Roads Article 35 (paragraph 1, 3, 4, 6) these companies are responsible for relocating all telecommunication installations which are placed in the roadbed and road belt, if required.

Telenor, Telemach)	
Media	
National TV and radio stations, and print media	National media is actively involved in sharing information and updates regarding the Project, e.g. information related to the national EIA public consultation meetings were published in national print media.
Local TV and radio stations, and print media from Budva, Kotor and Tivat	Local media are interested in activities realised as part of this Project which has great local and national importance. They also have a significant role in dissemination of information and disclosure of information to the local population.

Summary of Disclosure Methods

Method	Description
One-to-one interviews	Face-to-face or telephone interviews with individuals using a semi structured interview guide. Interviews may be formal or informal. A broad range of topics may be covered.
Key Informant Interview (KII)	Qualitative, in-depth interviews with individuals who are well-informed about a specific topic. Conversations can be formal or informal, often simply using a checklist of points to discuss.
Focus Group Discussions (FGD)	A planned discussion in a small (approx. 4-12 people) group, facilitated by a moderator. Such discussions focus on a topic(s) of specific relevance to the group. Meetings are designed to obtain information about preferences and opinions in a relaxed environment. Participants are actively encouraged to express their opinions.
Community meetings	Public meetings with community members invited to discuss aspects of the Project of relevance to their community. Such meetings are advertised in advance. In general, everyone is offered the opportunity to speak and the meetings cover a broad range of topics.
Questionnaire	A data collection instrument that is usually concise with pre-planned questions designed to yield specific information. Questionnaires are used for surveys and aid with statistical analysis.
Website	Websites provide a digital platform to post Project related information. They provide a convenient way to view documents, for those with access to digital resources.
Printed materials	Text summaries and infographics offer a good overview of information to be presented. They can be handed out in meetings, posted/sent out electronically or displayed in public places on notice boards.
Announcements	Announcements are important to inform stakeholders about upcoming meetings or to disclose key project information
Feedback/comment forms	These are typically made available at the end of meetings to allow participants to provide additional comments on the Project or the meeting itself.

Summary of Engagement Meetings (Meetings led by Nikola Arnaut of the TA unless otherwise stated)

ID	Date	Stakeholders Present	Purpose of Meeting
Design Phase			
1	29/03 /2016	Representative of the Municipality Budva	Delivery of planning documentation for preparation of the Preliminary Design to the Municipality of Budva, letter no; 02-2658 / 1, dated 31st March 2016.
2	10/10 /2016	Representatives of the Local Community Lastva Grbaljska	Delivery of information to the Local Community Lastva Grbaljska no: 02- 9897/1, dated 10th October 2016 regarding the requests made by the Local Community Lastva Grbaljska in respect to the Preliminary Design.
3	13/10 /2016	Representatives of the Municipality Kotor President of the Municipality Kotor Representatives of the local communities from Grbalj	The meeting was held in the premises of the Kotor City Council and it was held for the purpose of presentation of the Preliminary Design. Representatives of the TA included Nikola Arnaut, and Radojica Poleksic, as well as CEO of “SIMM inženjering” – the Designer Representative of “Via projekt” – co-Designer
4	20/03 /2017	Representative of the Municipality Budva	Submission of the Preliminary Design for approval to the Municipality of Budva, letter no; 02-2707 / 1, dated 20th March 2017.
5	30/03 /2017	Representative of the Municipality Kotor	Delivery of letter No: 02-3160/1, dated 30th March 2017, providing an official positive opinion regarding the Preliminary Design for the Tivat-Jaz road section
6	25/12 /2017	Council of the Local Community Grbalj	Delivery of Letter No: 02-1587 / 2, dated 22nd February 2018, submitted by the councils of the local communities of Grbalj, who opposed reconstruction of the boulevard and requested amendments of the Preliminary Design in the way that it is more aligned to their living conditions.
7	09/03 /2018	Council of the Local Community Grbalj	Delivery of Letter / PETITION No: 02-2093 / 1 dated 09th March 2018, in which the local communities opposed reconstruction of the boulevard and submitted a number of requests for amendment of the Preliminary Design.
8	05/04 /2018	Representative of a business entity from the Tivat-Jaz road section	Delivery of Letter No: 02-3105 / 1, dated 5th April 2018, in which the owners of several business premises in Lastva Grbaljska expressed the opinion according to which they are opposing the requests made by in the Petition which was submitted by representatives of the local community Lastva Grbaljska Municipality.
9	04/07 /2018	Nikola Arnaut, Transport Administration	Delivery of the response to the citizens' petition no: 02-2093 / 2 dated 4th July 2018 addressed to all local communities in the Kotor municipality.
10	16/05 /2019	Representative of the Regional Water Supply Company	A meeting between representatives of the Regional Water Supply and Transport Administration was organized with the purpose of discussion of construction of a new regional water supply pipeline, which is going to be constructed simultaneously with reconstruction of the boulevard.

11	19/03 /2019	Executive Director of the Transport Administration Chief of Staff to the Prime Minister Two representatives of the local communities from Grbalj	The meeting was held at the premises of the Government of Montenegro. The main topics of discussion included all outstanding issues that may arise during construction and the potential mitigation measures that should be applied. Representatives of the local communities provided their opinion and suggestions in this regard. It was agreed that a compromise should be reached in the way that it meets requests of the local communities to the highest possible degree.
National EIA Process			
12	23/12 /2019	Tivat municipality, 9 community stakeholders present	A team consisting of representatives from the TA, Nature and Environment Protection Agency (NEPA), MEDIX and E3 Consulting met with community stakeholders in Tivat. The purpose of the public consultation meeting was to present the national EIA study, and also to share information with the community members regarding the national EIA process, and the international ESIA process. The meeting gave the community members the opportunity to express their views and concerns related to the Project, and to have these views heard by NEPA, who took these views into account in their comments to the Project proponent as part of the permitting and approval process.
13	24/12 /2019	Budva municipality, 8 community stakeholders present	Representatives from the TA, Nature and Environment Protection Agency (NEPA), MEDIX and E3 Consulting met with community stakeholders in Budva. The public consultation meeting was to present the national EIA study, and share information with the community regarding the national EIA process, and the international ESIA process. The meeting gave the community members the opportunity to express their views and concerns related to the Project, and to have these views heard by NEPA, who took these views into account in their comments to the Project proponent as part of the permitting and approval process.
14	26/12 /2019	Kotor municipality, 4 community stakeholders present	A team consisting of representatives from the TA, Nature and Environment Protection Agency (NEPA), MEDIX and E3 Consulting met with community stakeholders in Kotor. The purpose of the public consultation meeting was to present the national EIA study, and also to share information with the community members regarding the national EIA process, and the international ESIA process. The meeting gave the community members the opportunity to express their views and concerns related to the Project, and to have these views heard by NEPA, who took these views into account in their comments to the Project proponent as part of the permitting and approval process.
15	26/12 /2019	Radanovici community, 33 community stakeholders present	Representatives from the TA, Nature and Environment Protection Agency (NEPA), MEDIX and E3 Consulting met with community stakeholders in Radanovici for a public consultation meeting to present the national EIA study, and

			also to share information with the community members regarding the national EIA process, and the international ESIA process. The meeting gave the community members the opportunity to express their views and concerns related to the Project, and to have these views heard by NEPA, who took these views into account in their comments to the Project proponent as part of the permitting and approval process.
ESIA Scoping Process			
16	04/12 /2019	Representatives of the municipalities of Kotor and Tivat	The international ESIA team met with representatives of the municipalities to inform them of the Project, to notify them that the international ESIA process was commencing, and to hear their views, concerns and opinions of the Project. The team also sought together information on any other upcoming projects in the municipalities in order to inform the cumulative impact assessment. Representatives from the TA were also present.
17	05/12 /2019	Representatives of the Radanovici and Lastva Grbaljska communities	The international ESIA team met with representatives of the local communities to inform them of the Project, to notify them that the international ESIA process was commencing, and to hear their views, concerns and opinions of the Project. These meetings were important because these two communities in particular expressed concern regarding the Project during the national EIA phase. Representatives from the TA were also present.
ESIA Study			
18	05/02 /20 - 12/02 /20	Socio-economic surveys with 98 households living in the Project Affected Area	As part of the socio-economic baseline studies, the study team organized interviews with 98 households living within 50m of the centre line of the Tivat-Jaz road (or just outside). The purpose of these meetings was to inform the households of the international ESIA process, to ensure that they were aware of the Project, and gather their views, concerns and feedback on the Project through the filling in of socio-economic survey questionnaires. The data gathered through the questionnaires was also used to inform the socio-economic baseline of the ESIA, and the Land Acquisition and Resettlement Framework (LARF), and to identify any particular groups that might be differentially impacted by the Project.
19	05/02 /20 - 12/02 /21	Socio-economic surveys (SES) with 72 businesses operating in the Project Affected Area.	As part of the socio-economic baseline studies, the study team met with representatives from 72 businesses located within 50m of the centre line of the Tivat-Jaz road. The purpose of these meetings was to inform the businesses of the international ESIA process, ensure that they were aware of the Project, and gather their views, concerns and feedback on the Project through the filling in of socio-economic survey questionnaires. The data gathered through the questionnaires was also used to inform the socio-economic baseline of the ESIA, and the LARF.

20	10/02 /20 - 21/02 /20	Representatives from 13 different key informants in the area: (Elementary School 'Nikola Djurkovic; Arcadia Academy; Clinic 'Fidami Medica'; Polyclinic 'Hippocrat'; Kotor Hospital; Municipality of Kotor; Municipality of Tivat; Utility Company Budva; Utility Company Kotor; Utility Company Tivat; Local Tourism; Organisation, Budva Local Tourism Organisation, Kotor Local Tourism Organisation, Tivat)	As part of the socio-economic baseline studies, Key Informant Interviews (KIIs) were held with representatives of different institutions in the area including local municipalities, schools, health installations, utility companies and local tourism organisations. The purpose of the meetings was to inform the institutions of the international ESIA process, ensure that they were aware of the Project, gather their views, concerns and feedback on the Project, and also to supplement data for the ESIA socio-economic baseline gathered through the individual surveys and secondary data research. The meetings were facilitated by a team of local consultants.
21	21/02 /2020	Focus Group Discussions with: - Pupils (youth) at Radanovici school	As part of the socio-economic baseline studies, a Focus Group Discussion (FDG) was held with one smaller selected group of Radanovici school pupils to hear their specific views, concerns and feedback on the Project, and also to supplement data for the ESIA socio-economic baseline gathered through the individual surveys and secondary data research. Additional focus group was organized with children-pupils from the school. The meetings were facilitated by a team of local consultants.
22	12/02 /2020	Community meeting in Radanovici, 9 participants.	As part of the Project's commitment to transparent and open communications with the community, a follow up meeting with Radanovici community was held. The purpose of the meeting was to share the Main design of the road with the community, following requests to do so during the national EIA consultations. The TA sent out invitations to the meeting, and presented the design and project updates to the participants. Consultants who were also at the meeting shared a 2-page summary on the ESIA Scoping report with the participants.

Notice of socio-economic research into reconstruction and modernization of the main road M2, section Tivat-Jaz

We would like to inform the interested public that as one of the activities within the preparation of the Environmental and Social Impact Assessment Study (ESIA), and for the implementation of the project "Reconstruction and modernization of the main road M2, section Tivat-Jaz, from 885km + 500 to 901km + 500", socio-economic research will be conducted among households and economic entities in the project area. Socio-economic research will be conducted in accordance with the policy of the European Bank for Reconstruction and Development (EBRD), in the period from February 5 to 16, 2020.

Meeting on 28/01/20 at Traffic Directorate with Erdan Seferović, representative of the owner of plot 297/1

Contents of the project documentation in the project of the subject plot and information on the project of the expropriation study. After providing information on the status of the project and the planned expropriation, Mr. Seferović thanked for the information provided and expressed his desire to stay in touch on the future development of the plot.

Appendix 2: Introductory presentation and information about the LARP survey

- The LARP survey is being carried out for the purpose of EBRD and Transport Administration. E3 and ENOVA (Bosnia and Herzegovina) have been engaged as consultants for the purpose of implementation of the survey
- All data will be used on the cumulative level and data will be protected, i.e. anonymous during the data analysis. The data will exclusively be used for the purpose of development of LARP and it is not going to be made available to any third party.
- LARP will be made publicly available after it is completed and approved by the EBRD.
- The survey is being carried out for the purpose of development of LARP (Land Acquisition and Resettlement Plan). LARF was prepared as part of the ESIA process (Land Acquisition and Resettlement Framework).
- ESIA package has been publicly available and disclosed on the Transport Administration's website, whereby the disclosure period lasts until 5th December. ESIA package was published on 7th August, while the public disclosure process has been aligned with the EBRD's procedures.
- Grievance mechanism has been available on Transport Administration's website, and it is available to all the interested parties who want to submit any grievances, complaints and/or suggestions regarding reconstruction of the Main Road Tivat-Jaz.
- The expropriation process is managed by the Real Estate Administration (REA). REA has commenced the process of officially informing the local population and inviting them to the meetings aimed at informing them about all the details related to expropriation and the defined compensation amount. Local units of the REA represent the competent authorities for all matters related to expropriation, i.e. the competent authorities in this case are the REA Budva, REA Kotor and REA Tivat.
- It is currently not possible to organise meetings due to the situation caused by COVID-19, but the grievance mechanism provides all the interested stakeholders with the opportunity to submit their comments in this phase.

Appendix 3: Issues Raised During ESIA Process (2020)

Issues raised during LARF and LARP studies

ID	Comment	Date	Source
1	There will be no traffic relief until Budva is bypassed.	01/02/20	<u>Survey of Project-affected households from SES, pp. 60</u>
2	Until the detour around Budva is built, there will be no other solution		
3	It cannot be reduced in this way. Only if the transit is moved to another location. It will have negative effects.		
4	I do not think this will improve the transit of traffic only when the congestion is lower, but it can lead to major traffic crashes which have been high so far.		
5	If they set the 80km / h limit it will be a problem.		
6	He will have to close the restaurant because he will lose the parking lot.		
7	Access to building plots will be a problem.		
8	I can't accept. They are intended to go through the pavement. We need the bridge crossing.		
9	It will again create congestion.		
10	The plan is to build a boulevard type of road, thus road access is going to be a problem. The road will pass 3.5m into their land plot, while a 7m wide strip (out of the total 22m) is taken on their other land plot. These circumstances are going to have an impact on conditions for construction of the planned objects, and the owner does not know what to do	26/11/20	<u>LARP BS survey comments</u>
11	Access road needs to be built for the car repair shop. Otherwise they would have to drive all the way to Lastva in order to reach their premises		
12	They would have to close the car wash business if their requirements are not met - i.e. that they do not build the road 5m into their property		
13	They may have to close their business		
14	They have not been informed whether their land is going to be subject to expropriation		
15	They may have to close the business		

16	They may have to close the business		
17	They hope that the problems will be solved so that they could continue their operation		
18	They are not happy because the road is going to run through the settlement	25/11/20	<u>LARP HH survey comments</u>

Letter from members of the Lastva Grbaljska community 01/11/2020

19	<p>We are expressing our absolute disagreement with the abovementioned project and we hereby state that we are rejecting this project. We would like to reiterate that we are still decisively opposing construction of a 4-traffic lane road, each of which is 3.25m wide, including a 2m wide central reservation and 2m wide sidewalks along each side of the road, all of which is planned to be built in our settlement, whereby our disagreement is primarily related to the width and position of the road alignment. We stand by our requests and defined principles which were signed by more than 700 people in Grbalj. We would hereby like to invite the Transport Administration and other relevant authorities in the chain of custody for this project to analyse our requests from the petition one more time and to accept opinion of the local population. We are against demolition of objects (according to our opinion, it is not necessary to demolish objects), while we also oppose unreasonable proximity of the new road to the existing objects since it is not going to be possible to continue living and working in these objects after reconstruction. We are going to oppose construction of this road through all the available legal and other means, all while believing that someone is finally going to accept our numerous complaints and suggestions, because we assume that this road is also going to be built for us who live next to the existing road, and not only for those whose aim it is to travel from Jaz to Tivat as fast as possible.</p> <p>We believe that the practice of making decisions before construction, whereby numerous studies which are not aimed at rational and unbiased analysis of the project, but at providing unconditional support and rights to those who are planning huge investments without analysis of any other solutions, are developed only after all decisions are made. This is primarily aimed at construction of the Budva bypass, which would solve the issue of traffic jams in this area in the long term, whereby it would also solve the issue of making double investments for the purpose of solving a single issue.</p>
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Issues Regarding Flooding raised by Arcadia Academy and M Club 27/02/20

20	<p>I would like to bring to your attention a serious matter that impacts the new road construction project. We operate a school located not far from the main Budva-Tivat roundabout (approximately 100 meters behind HDL Café, Vuksic D-Event). On two separate occasions in the last two years, our school suffered severe flooding that put at risk the lives of children at our school. On both occasions, Kotor fire fighters had to conduct a rescue operation and evacuation. The school physical premises suffered significant repair costs exceeding 60,000 Euros. The surveys done by our neighbour who was also flooded, has established that Kotor negligently failed to maintain drainage channels which were found</p>
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	<p>to be blocked, resulting in water over flowing onto our plot and that of our neighbours. On both occasions, we have put Kotor municipality on written notice along with a claim for damages. In spite of written warnings that drainage channels were blocked and there was an urgent need to take action to protect the school, the Kotor municipality fully ignored our requests and has consistently behaved with extreme negligence and disregard for the safety of children.</p> <p>This letter is to inform EBRD that our neighbour has instituted a legal action which we intend to join. We demand that the EBRD financed new road construction must be built with proper engineering in order to ensure the proper drainage of rain water. We would request your project manager or person responsible to advise us in writing that they are aware of the very hazardous conditions and that are planning to rectify the situation on this matter as part of the construction project. We are highly concerned, that if the engineering works are not taking into consideration the current conditions, the result maybe even worse than what has previously occurred. Therefore, we insist on receiving written plans and assurances from engineers that adequate drainage will be provided.</p>
	<p>01/03/20 TA response: The project documentation was developed with advice from hydroengineers and hydrogeologists who conducted a detailed survey of all watercourses in the area. A road maintenance company was also contacted by the TA to provide inputs regarding the locations which are characterised by flooding, based on their experience. The flooding problem will be solved through construction of a closed stormwater sewage system with separators. This will prevent generation of uncontrolled road runoff which was affecting the recipients. The TA also plan to build open channels for intake of water which is generated at locations pointed out by Arcadia Academy and M Club and their concerns and issues will be solved.</p>

Issues Raised During National EIA Consultation Process December 2019

Local Community meeting 05/12/19

	Issue raised	TA Response
77	Community requests have not been incorporated in the Main Design, with the exception of the request for reducing the width of the traffic lane from 3.5m to 3.25m.	The MTA has had many meetings with the local community over the past 3 years, and that many requests were incorporated into the Main Design to the reasonable and technically acceptable extent. In addition to reducing the width of the traffic lane to 3.25m the MTA added a roundabout at the request of the community. The MTA also provided an official response to the requests stipulated in the petition

78	A 3-lane boulevard should be made instead of the fast 4-lane road which has been designed. The road should have 3 lanes in the populated areas, while 4 lanes can be built in unpopulated areas. This would avoid land acquisition and would reduce the speed limit to 50 km/h.	A 4-lane road has been designed to provide better traffic flow along the entire section. Speed will be regulated through construction of roundabouts.
79	(Mr Labud Mihovic): Construction of additional roundabouts should be considered since the local population would have to travel much further to reach their households, because distance between some roundabouts ranges from 1 to 2 km.	The number of roundabouts along the entire section is not low since 13 roundabouts are included in the Main Design.
80	(Mr Labud Mihovic): A roundabout should be built in front of the elementary school in Radanovici rather than (as per the Main Design) a 4-way intersection. This would provide better traffic safety conditions, better local communication and reduction of speed in this section. Traffic safety represents an important issue at this section because many people (including kids) have died due to collision with cars. The existing underpass is not being used by kids, and the reconstructed underpass will not be used either because the community is not used to using it.	Two roundabouts have been designed just before and after the school in Radanovici so that cars would slow down and thus provide conditions for safe crossing of the street. If a roundabout was to be designed at this location, the restaurant “Velji mlini” would have to be demolished since the minimum radius of a roundabout is 26m.
81	(Mr Labud Mihovic) The Main Design is not aligned with the local spatial plans defined for this specific area (DSP Radanovici, LSL Grbalj, LSL Grbalj II, UPN Lastva Grbaljska).	New road has been designed in accordance with the laws and national spatial planning documentation (Spatial Plan of Montenegro until 2020). These are the principal document that should be followed in respect to design of main roads. The only local spatial plan that could not be fully integrated in the Main Design is the LSL Grbalj, because this is not aligned with the Spatial Plan of Montenegro.
82	(Mr Milorad Radanovic) The Main Design was presented to the Municipality Kotor, not to the representatives of the local community. They are not informed about the final version of the Main Design.	

83	(Mr Milorad Radanovic): The local community requires reduction of width of the separating island from 2m to 60cm. Many new roads in Montenegro have narrow separating islands (60cm) and this width would be enough and that it would satisfy all the traffic safety conditions.	The width of the separating island (2m) has been defined for the purpose of providing better safety conditions for pedestrians.
84	Road barriers are not needed along the footpaths and the separating island. They would not be visually appealing. There are no barriers along the existing road, so their removal would not decrease traffic safety.	Road barriers are included in the Main Design for the purpose of traffic safety, and for protection of pedestrians while crossing the road. Road barriers will be placed along the separating island so as to avoid head-on collisions.
85	They do not want to have fencing along the separating island.	As above.
86	The local roads which are currently connected to the main road should also be included in the Main Design.	The local municipalities are responsible for construction/reconstruction of the local roads. The MTA is only responsible for construction/reconstruction of regional/main roads. The local community should communicate with the Municipality Kotor in this regard
87	The national EIA does not take into account the social aspect of the project. The project must meet the needs of the local communities. They have analysed the document and will attend the public consultation meetings regarding the national EIA, which are going to be held after 20th December.	EBRD: The ESIA and the project itself must be developed and implemented in line with EBRD's ESP and PRs. Stakeholder engagement represents an essential component of all the EBRD's requirements. The local community is going to be consulted during the entire process and their requests and suggestions in regards to environmental and social context will be taken into account.
88	The local community want construction of a roundabout (not planned intersection) here as it would provide conditions for better traffic flow and better connection between settlements. The location would be ideal for a roundabout since it would reduce travel time for local people - the distance between two closest roundabouts in this area is around 1.2 km.	The designer and the MTA have considered various options regarding construction of a roundabout at this section, but that it is not possible to build a roundabout at this location without demolition of a couple of business objects, which would also cause high additional compensation costs. However, Mr Arnaut stated that the designers and the MTA are going to consider the option of providing traffic lights at this section.

Meeting in Municipality of Tivat : 23/12/19

	Issue raised	TA Response
21	What is the planned start date of the reconstruction?	The process of selecting contractors must be carried out in cooperation with the EBRD, which will define the deadlines and dynamics of selecting contractors, but it is planned that work will begin before the summer tourist of the 2020 season
22	What is the drainage system that will be installed on the route, ie the system of treatment and monitoring of wastewater pollution indicators?	(Mr. Maras): the separators will be used only for the treatment of wastewater from the road, where all separators are designed to a higher capacity than necessary, or expected at any time. Monitoring and maintenance need to be performed continuously, with the separators being cleaned 3-4 times a year, which will be the responsibility of the contractor and the competent municipal authorities. The maintenance of the drainage system and the separator system is in the competence of local governments in accordance with the legal regulations in this area.
23	What is the level of the road in the area next to the airport, will it be raised here to prevent flooding of that part of the road?	The level was raised along this part of the road, precisely for the reason of reducing the flooding here. Also, in this part, receiving channels for coastal waters from Vrmac were designed, while one of the audit requirements included detailed cleaning and expansion of the recipients in order to ensure higher flow capacity. In this part it is specific that there is a drainage pipe under the airport runway, but it is impossible to access it, so the above solutions and separators will be used to drain excess water from the road
24	Ms. Vesna Nikolić asked about the possible relocation of installations used within the regional water supply	Mr. Arnaut stated that it is necessary to relocate the regional water supply installations to 3 locations, which was done with the approval and in cooperation with the Regional Water Supply. The reconstruction of the main road will be carried out in parallel with the installation of the new part of the regional water supply system, whereby their installations will be placed on the right side of the road, observed from the direction of Budva. Vodovod Kotor, CEDIS and CGES design their installations in accordance with the main project solutions, and given the width of the dividing island will place their installations in the central, ie dividing zone.
25	Mr. Radovan Laković asked about the maximum allowed speed on the newly designed road	These restrictions are not defined by the planning documentation, but a traffic safety study was conducted by an independent expert from the EBRD, and these experts will be in charge of making the final decision on the maximum allowed speed. As the safety of pedestrians and traffic participants will be a priority fences will be set up along the sidewalks and along the dividing island

26	Mr. Laković's second question was about paths for cyclists / scooters	These paths were not designed as they would require additional space. The municipalities did not have any requests on this issue
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Meeting with Representative of Svinjište 24/12/19

	Issue raised	TA Response
27	The Vice President of the Local Community of Svinjište, Mr. Igor Gluščević, emphasized that in the previous period he had invested 1.5 million euros in a hotel located near the road in question, but that he was not familiar with the project solutions related to that section.	Mr. Arnaut emphasized that the Municipality of Budva has been familiar with the project from the very beginning and the presentation of the conceptual design (2016). The Municipality of Budva does not have valid planning documentation (PUP, DUP) which would regulate the works in the zone in question, and therefore the Municipality of Budva could not have special requirements that would relate to road elements, such as paths for cyclists. Also, Mr. Nikola stated that the Municipality of Budva only has a planning document dating from the 1980s, and that therefore it was not possible to define the project in accordance with the local planning documentation. In order to acquaint everyone present with the main characteristics of the future boulevard, Mr. Arnaut stated that the sidewalks on both sides were designed to be 2m wide along the entire route, and that the projected width of the lanes along the entire route was 3.25m (at the request of citizens). Also, Mr. Nikola stated that a dividing island 2 m wide along the entire route was designed. When it comes to the project solution for the part of the road located on the territory of the municipality of Budva, Mr. Nikola stated that 2 roundabouts were designed (near the bridge in Topliš and at the intersection leading to the beach Jaz). Also, when it comes to the intersection in Poljice, Mr. Arnaut stated that the construction of a roundabout at this location was considered, stating that the potential construction of the roundabout was conditioned by the location of the contact point with the future bypass around Budva. In this regard, the bypass project is currently in an advanced stage and another location of the contact point has been defined (location between the bridge to Kotor and the road leading to Terna), so a surface intersection with a left turn lane will be made at this location, with the possibility of a semicircular

		<p>rotation. When it comes to additional elements of the road (eg bike paths), Mr. Arnaut stated that there were no special requirements for the construction of these elements, emphasizing that the width of the sidewalk of 2m leaves enough space for unhindered movement of cyclists along the road. stated that the project also includes the construction of bus stops.</p>
<p>28</p>	<p>Mr. Igor Gluščević stated that the construction of the intersection at the location of Poljica is not the safest solution and that the construction of a roundabout should be considered due to the safety of traffic participants. Also, Mr. Gluščević asked about the installation of fecal sewage during the works on the future boulevard Mr. Dragan Orlović also emphasized that the construction of the intersection at the location of Poljica is not a safe solution because it will not be safe to perform a semicircular turn at that location, and that safety must come first when designing the boulevard. Mr. Orlović emphasized that the Traffic Administration violated the valid DUPs in the area of Kotor because in the part of Radanović and Lastva Grbaljska, certain solutions defined by the local planning documentation were not respected</p>	<ul style="list-style-type: none"> · The sewage system is not the subject of this project but is the responsibility of the local authorities. The Municipality of Kotor requested the main project from the Traffic Administration in order to design the faecal sewerage and other communal elements in accordance with the project of the future boulevard. · A traffic safety study is being prepared by independent EBRD experts, who stressed that the planned number of roundabouts on the entire section (13) is too large, due to the fact that they do not support such a large number of interruptions. dividing island. · During the design, special attention was paid to compliance with the planning documentation that is in line with the national planning documentation, whereby all solutions that could be designed in accordance with the valid planning documents were adopted. Also, the requirements of local communities were respected during the design, so 3 additional roundabouts were included in the main project. · When it comes to business facilities that are located on the longer route of the road, Mr. Arnaut stated that all business facilities are provided access through downed curbs, and that service roads that are planned in some parts are under the jurisdiction of municipalities. · The consultations in question should relate to the national study of environmental impact assessment, while in accordance with the rules of the EBRD will be conducted a separate consultation process that will cover issues related to the technical part of the project, the environment. and social issues. the requirements of local communities were respected during the design, so 3 additional roundabouts were included in the main project.

<p>29</p>	<p>(Mr. Labud Mihović): Residents of Lastva Grbaljska (half of the settlement is located in the municipality of Budva, the rest in the municipality of Kotor) currently have a 3m wide sidewalk in one part and that they want the sidewalk width in that part to be the same. after the construction of a new boulevard. Does the EIA include the flow and speed of traffic, ie the pollution that occurs due to the movement of motor vehicles? Vehicle speed must be adjusted to the boulevard-type road. Will the new boulevard create conditions for shortening travel time as jams will continue to form at the entrance to Kotor and Tivat. how will game will cross from one part to another of new road? This is the only boulevard on which a 2m wide dividing island will be built (except for the road that passes by Kombinat aluminijuma), locals believe that it is necessary to reduce the width of the dividing island to 1m. width sufficient for the unimpeded movement of pedestrians, thus reducing the impact on land expropriation.</p>	<ul style="list-style-type: none"> · New speed cameras have been installed in Radanovići and that the maximum speed recorded during the previous period was 158 km / h, so it is necessary to keep in mind the fact that it is not always possible to control all traffic participants · Mr. Arnaut emphasized that he understands that one of the reasons why the local population wants to reduce the width of the dividing island is that they want to prevent the demolition of one of the houses that according to the current draft solution must be demolished. However, Mr. Arnaut stated that reducing the dividing island to a width of 1m would not help because in the case of that facility a total of 4.5m is needed to prevent the demolition of the house.
<p>30</p>	<p>(Mr. Mihović): roundabouts are the best way to regulate traffic safety. He also emphasized that the boulevard is a very good step towards the development of the subject area and that it will bring new opportunities to the local population and economy, emphasizing that the local population was met during the design of the subject road</p>	<p>Mr. Arnaut spoke about the axis of the road, emphasizing that the axis is very precisely defined by the DUPs and the Study of Location 24 on the stretch from Cheren Hill to Tivat Airport. Also, Mr. Arnaut stated that DSL1, DSL 2 and DUP Radanovići do not define the construction of any roundabout on that stretch</p>
<p>31</p>	<p>(Mr. Dragan Orlović) It is not possible to design the boulevard without violating the DUP, which was confirmed by the Municipality of Kotor in response to the letter from the representatives of local communities. The common position of the local population is that the existing axis of the road must be maintained</p>	<p>The axis of the road defined by the DUP must be respected, but that the Traffic Administration worked in the best interest of the local population and the economy, so they made changes to the project on a couple of occasions. For example, to reduce the width of the sidewalk in front of the Tomičić family building in order to avoid the demolition of their building. Mr. Arnaut once again emphasized that Radanovići and Grbalj are defined by the DUP.</p>

32	Mr. Dragan Orlović stated that the waters that flow from the hill Spas are a problem and cause flooding of the road and the surrounding terrain. His question on this basis referred to the implementation of these waters, and he especially wanted to know how the drainage of water from the boulevard to the final recipients would be resolved.	Mr. Arnaut stated that the auditor required the cleaning and expansion of the recipients so that they would have the capacity to receive large amounts of water. On this occasion, Mr. Arnaut emphasized that 4 hydrologists did a detailed research for 7 days in order to define the best project solutions on this issue, and thus prevent flooding of roads and terrain. Also, Mr. Maras emphasized that separators will be set up along the entire route
33	Mr. Gluščević asked about the expected duration of the works	The works will last for 2 years, with breaks during the summer season. Works will first be performed on the section parallel to Tivat Airport, and outside the existing route, while the second and third phases of works would be carried out in the area of Kovacko polje , ie Lastva Grbaljska and Radanović
34	(Mr. Vido Gluščević): Asked about the crossings that are defined for the crossing of animals from one side to the other (eg cows)	3 corridors for the crossing of animals have been defined, under two bridges and near the Poljice location.
35	Mr. Dragan Orlović: in the previous period there were many shortcomings in communication with the Traffic Administration, but that communication has improved since the local population submitted a petition to the EBRD. The local population must be consulted because they have the most experience and can expose all the problems that need to be solved by building new roads. From the aspect of national economy, the construction of the boulevard in question is a "crazy investment" because the state is already over-indebted and that the only road to be made in this area is a bypass to the "Jugodrvno" facility located in the industrial zone. Radanović. Mr. Jovo Doljanica emphasized that behind the words of the local population who were present at the meeting are 750 citizens who signed the petition and jointly presented the requests related to the specific elements of the future boulevard	No response required

36	(Mr. Igor Gluščević): the existing infrastructure in the settlements in Budva, along the road in question, do not meet the needs of households located in this area. The reconstruction of these elements of public infrastructure should be done in parallel with the construction of the planned boulevard	The Municipality of Budva is responsible for the implementation of these activities and that the public must contact the competent local authorities on this occasion.
37	(Mr. Vido Gluščević): What is the manner of payment of compensation to the owners of plots in Mrčevo polje? There are more than 2000 owners of plots in that territory, and the owners of these plots have been in the process of resolving the issue of property relations with the state since the 1960s, and these issues have not yet been resolved. The parcels were not accurately plotted on the existing maps, and that they needed to be plotted on old (Austro-Hungarian) maps because they best show the real situation regarding the division of parcels. "How will you know who to pay for the expropriation?"	Mr. Arnaut stated that Mrčevo polje belongs to MZ Svinjište, ie KO Prijedor II. The expropriation study for this cadastral municipality has been completed and it contains a list of all applications, whereby the Traffic Administration received information on the owners of plots from the Real Estate Administration of Montenegro. Mr. Arnaut stated that the Traffic Administration is aware that this project cannot be realized without the support of the NGO Mrčevo polje, having in mind their importance. Also, Mr. Arnaut emphasized that the EBRD requires resolving all property-legal relations before the start of works.
38	(Mr. Gluščević): What is the date of the meeting with the representatives of the Traffic Administration, whereby the main project would be presented to the local population. Also, what is the expected time frame for the start of works.	Mr. Arnaut stated that the meeting will be organized after January 13, 2020, while the works are expected to start in the fall of 2020

Consultation at Elementary school "Nikola Đurković", Radanovići 26/12/19

	Issue raised	TA Response
39	Mr. Ljubo Nikaljević asked about the manner of treatment and implementation of wastewater, ie the manner in which they were mapped	Mr. Arnaut answered that the team of hydrogeologists worked in the field with the representatives of the company "Crna Gora put", which is in charge of maintaining the main roads. In accordance with the results of the research, a system of side channels along the entire route has been designed, through which coastal waters will be conducted to the recipients. Also, the auditor

		envisioned cleaning and spreading the recipients to ensure the reception of large amounts of water. Also, Mr. Arnaut emphasized that the wastewater from the road will be treated using separators that will be placed along the route
40	Mr. Stevan Kordić (member of the Grbalj Local Community Council) pointed out the correction that needs to be made in the EIA study. Namely, on page 140 it is stated that recipients up to 25 m away are exposed to strong noise (63 decibels), while the same is not stated for recipients up to 50m (61 decibels), although the limit of strong noise exposure is defined as 60 dB. Also, Mr. Kordić stated that it is necessary to consider the broader context when assessing the impact, paying special attention to the fact that Tivat Airport is located in the subject zone and that during the summer they have up to 50 rotations per day, which causes high noise levels. Therefore, he stated that the specificity of the subject area must be taken into account when assessing the impact.	Mr. Maras replied that the mentioned definition of the impact of noise on recipients up to 50 m away will be corrected in the study, in accordance with the suggestions of Mr. Kordić. Also, Mr. Maras stressed that the noise level can only be determined experimentally, so measurements are needed to determine the actual noise level in the project area. Also, Mr. Maras stressed that corrections will be made to see the cumulative impacts, ie to include the noise caused by the movement of the aircraft in the impact assessment in relation to the noise level in the project area. Finally, Mr. Maras stated that the Study is still a "living" document and is available for comments and suggestions, so measurements are needed to determine the actual noise level in the project area. Also, Mr. Maras stressed that corrections will be made to see the cumulative impacts, ie to include the noise caused by the movement of the aircraft in the impact assessment in relation to the noise level in the project area.
41	Mr. Kordić emphasized that the impact on people is mentioned only twice in the Study, in sections 7.1 and 7.2, so it is not stated what the impact on people is. Mr. Milivoje Vukadinović emphasized that the number of animals was stated in detail in the Study, but that the number of inhabitants in the area in question was incorrectly stated. Mr. Orlović replied that the factual situation did not correspond to these data, and that the number of inhabitants in the project area was higher than stated	Mr. Maras replied that the number of inhabitants in the subject area was stated in accordance with the data from the last official census (2011), as well as that these are the only official data that must be used when making studies
42	Mr. Dragan Orlović asked a question related to the assessment of the number of vehicles, ie the structure and category of vehicles, because he believes that it is	Mr. Arnaut replied that a study of vehicles by categories will be done at all intersections, so these data will be available for further impact assessment.

	necessary to make a more detailed presentation on this issue	
43	Mr. Marko Popović asked about the planned manner and location of disposal of low-quality excavated material. Also, he stated that the pollution caused by the traffic on the subject section will be at the same or lower level because the traffic will be faster, having in mind that 4 lanes will be built. He also proposed the installation of traffic lights at surface intersections, because in that way traffic safety could be better managed	Mr. Maras replied that this type of material will be disposed of at a pre-agreed location, whereby the Investor must enter into a contract with the Municipality of Kotor. Also, for the needs of the project implementation, a Waste Management Plan will be defined, in accordance with which the waste generated on the subject section will be disposed of
44	Mr. Ljubo Nikaljević asked a question about the way in which pedestrian crossings are defined, as well as crossing points for animals (especially for cattle)	Pedestrian crossings would be organized at surface intersections and roundabouts, with locations defined for pedestrian crossings rated as safe by an EBRD traffic safety expert. Both sidewalks, 2 m wide, were designed along the entire route, with no construction of walkways planned. Mr. Arnaut emphasized that passages are planned for small animals and wildlife, with 3 corridors defined during the biodiversity research. Also, it is planned to set up a protective fence with the aim of directing the animals towards the passages. Finally, Mr. Arnaut stressed that no passes were provided for the cattle
45	Mr. Ljubo Nikaljević stated that the solutions defined for the crossing of animals are not good enough and that it is necessary to think of the local population that is engaged in agriculture and that must move the tractor from one side to the other. Mr. Nikaljević emphasized that the safety of people must be taken into account, emphasizing that the local population supports the project and is happy that it will bring them new development opportunities Mr. Nikaljević asked about the maximum allowed speed Mr. Nikaljević stated that it would be good to consider the possibility of building several footbridges and underpasses because a large number of pedestrians move along the road in question	Mr. Arnaut answered that the maximum allowed speed in populated areas will be 50 km / h. Also, on some parts of the road (eg in the school zone), additional elements for traffic safety will be installed, such as deceleration lanes and "humps" which will additionally regulate the speed of vehicles

<p>46</p>	<p>Mr. Dejan Štilet, President of the Local Community Vranovići (owner of the restaurant Bokeljska kužina) emphasized that the project should have been discussed a long time ago, so that the designers and the Traffic Administration could agree on project solutions. He emphasized that they are not against the boulevard, but that it was necessary to organize a commission with the mayor, and in that way jointly define project solutions. Mr. Štilet stated that he would lose his business if 700-800m² is taken away from him, as well as that it is necessary to respect the existing axis of the road and make 3 instead of 4 lanes. He also stated that the requests of the local population sent to the Traffic Administration were not met.</p>	<p>Mr. Arnaut emphasized that the demands of the local population were met as much as possible, so 3 roundabouts were additionally designed at the request of the citizens</p>
<p>47</p>	<p>Mr. Stevan Doljanica emphasized that the locals were not informed about the changes in the project which envisage the construction of 3 roundabouts required by the residents of this area, emphasizing that they still have not had the opportunity to see the Main Project</p>	<p>Mr. Arnaut emphasized that during all phases, the communication with the Municipality of Kotor was taken into account, so the conceptual design was sent to them for approval, after which the Main Design was submitted to them, which was to be presented to the local population</p>
<p>48</p>	<p>One representative of the local population emphasized that the urban plots were not well marked and that it was necessary to work in accordance with the Austro-Hungarian maps</p>	<p>Mr. Arnaut stressed that the project must be done in accordance with the valid and valid maps submitted by the Real Estate Administration, and that issues related to the boundaries of the plots must be resolved by the owners of the plots in cooperation with the Real Estate Administration.</p>
<p>49</p>	<p>Mr. Vesko Kordić stated that he is the owner of a vulcanization shop next to the road in question and that the construction of the road will potentially lead to the shutdown of his business, and that he will demand compensation for damages and lost profits so that he can start another business and support his family</p>	<p>Consultations will be conducted with all residents whose properties will be subject to expropriation, with a fair compensation for land and compensation for loss of business activity</p>
<p>50</p>	<p>The local population stated that they were not informed about the development of events and the new version of the Main Project due to the fact that some members of</p>	

	local communities did not share all information with them, although they attended meetings with the Traffic Administration and the Government of Montenegro	
51	Ms. Bojana Petrović from the Municipality of Kotor asked a question about the part of the study related to hazardous waste, which states that defining the manner of treatment and disposal of hazardous waste is not the subject of the EIA study (on page 114 of the study)	Hazardous waste management plan must be part of the project documentation, at the request of the EBRD, whereby the Contractor will be obliged to enter into a contract with the relevant companies and thus organize the process of disposal and treatment of hazardous waste
52	Ms. Bojana Petrović asked about the division of competencies when it comes to maintaining the separators that will be placed along the newly designed boulevard	The municipality is responsible for implementing that part of the obligations (cleaning and emptying the separator). Also, on this occasion, Mr. Arnaut stated that the alienation of gutters is a problem that often occurs, and that this issue is an important factor in terms of traffic safety.
53	Ms. Petrović stated that the chapter V-Alternative did not list the conditions obtained from the Municipality of Kotor, and asked the processor to make these changes in the document. Ms. Petrovic concluded that in the next 17 years, the number of vehicles traveling on the section in question is expected to increase by 2 times (from 3,500 to 7,000 vehicles per day, on average). In this regard, she asked about the competence for pollution control, ie for the installation of measuring stations	Mr. Redžepagić replied that the inspection is responsible for pollution control, while the Agency for Nature and Environmental Protection is responsible for setting up measuring stations, which must be done in accordance with the plan and program of the Agency. Mr. Vuksanović emphasized that the construction of a boulevard with 4 lanes means that there will no longer be such intense traffic congestion, which means that vehicles will spend less time in one place and that there will be better traffic flow, which further implies that pollution will occur due to traffic be less.

Issues Regarding Community Petitions from Municipal Assembly Kotor, Local Community Radanovici, Local Community Upper Grbalj, Local Community Savina, Local Community Lastva Graljska

Additional Petition Points of 25/07/18

1	Installation of infrastructure installations in the separating island is not envisaged in the abovementioned plans, but it is planned to install them along the outer side of the traffic lanes.
2	The abovementioned statements represent only some of the elementary discrepancies between the conceptual design and the valid planning documentation which you referred to in your memorandum. Below you may find the document provided by the Department for urbanization, construction and spatial planning of the Municipality Kotor, no. 0303-7545, dated 15th June 2018.
3	The Directorate for Construction issued URBAN PLANNING-TECHNICAL CONDITIONS (number 0503-1703/11, dated 04th September 2014) for development of technical documentation for reconstruction of the Main Road M-2: Debeli brijeg-Tivat-Budva, section Tivat Airport-Jaz, in line with provisions of the Spatial Plan of Montenegro until 2020. A sentence from the urban planning-technical conditions which is rather prominent is as follows: “that it is planned to carry out reconstruction of main roads and regional roads which has INADEQUATE STANDARD”. The abovementioned statement represents a nonsense and it must not be applied neither in the design or the construction process since such statement enables the investor and the designer to design to road at their own discretion, thus abusing the valid planning documentation. The abovementioned statement does not mean that it can be used for depriving the local population from their legitimate requests, based on the valid detailed urban planning documents nor that the will of the investor or the designer may be put into action without any legal possibility of control, because in that way the abovementioned institutions would be above and beyond the legal framework of Montenegro.
4	Agency for Protection of Environment, number: D-1982/2, dated 06th August 2014, provided their opinion per your request, whereby the opinion was provided in regards to the need for developing environmental impact assessment for the purpose of issuing urban planning-technical conditions, whereby they deceived you and the overall expert public, and we state this for the following reasons:
5	In the final section of the memorandum, the Agency states that “it is not necessary to carry out the procedure of environmental impact assessment”, while referring to the decree issued by the Government of the Republic of Montenegro. The Government adopted the “Decree on changes and amendments of the Decree on Projects for which Environmental Impact Assessment is Required” on 05 September 2013, whereby Article 2 of this Decree stipulates that “List I of projects for which environmental impact assessment is required, item 10. Infrastructure projects (d) Construction of a new road with four or more traffic lanes, or reconstruction and/or widening of the existing road with two or less traffic lanes, with the aim of making a road with four or more traffic lanes, in case sauch new road or reconstructed and/or

	widened road section have continuous length of more than ten kilometers”. This clearly indicates that an environmental impact assessment should be carried out for the subject road section by all means.
6	The Agency refers to List II, item 12 (f) “Construction of new main roads and regional roads with accompanying elements and reconstruction of the existing roads in the length of more than 20 kilometers”, whereby these are the projects for environmental impact assessment may be required, thus the statement made by the Agency “it is not planned to carry out environmental impact assessment” is definitely not correct. It is crystal clear that in this case, as it has been defined in the design, it is not planned to build a new road nor to carry out reconstruction of the existing road as it is stipulated in Article 6, paragraph 2 of the Law on Roads, but that the subject matter is related to a new road category.
7	- We deem that the suggestion for construction of a roundabout at the intersection “Đuranović”, at the end of the settlement Radanovići is completely justified”!
8	The project does not define construction of roundabouts in the section between “Popova” street and “Tresanjski mlin”, whereby distance between these two roundabouts is 2140m.
9	There are around 64 household that live in this section. The only access they would have to the boulevard Jaz-Tivat Airport is between these roundabouts. This would mean that, in case they want to go in another direction, opposite to the direction of their entrance/exit point, they would have to go to the first roundabout in order to turn around and go in the desired direction. The same applies in case they want to return from the direction opposite to the direction of their entrance/exit point. On average, that means that they would have to travel at least 2140m more due to lack of roundabouts in their vicinity. If we take into account the fact that it is necessary to go in any direction at least twice per day (school, work, shopping, etc.), each household would have to travel approximately 4280m, i.e. 4.28km more than today. Considering the fact that there are 64 households in this section, the number of additional kilometer that would have to be travelled is 237.92km per day. Annually, this additional distance that needs to be travelled would be 99980.8km, which approximately amounts to 1331 distances between Radanovici and Podgorica, 189 distances from Radanovici to Belgrade, 38 distances from Radanovici to Moscow, or if we want to be more illustrative, a circle around the Planet Earth could be made 2.5 times.
10	Due to all of the abovementioned, we deem that it is completely justified to build a roundabout at the intersection “Đuranović”, at the end of the settlement Radanovici. Distance between the intersection and the roundabout at the “Popova” street is 880m, which is more than 2.4 less than the distance between the roundabouts in “Popova” street and “Tresanjski mlin”. Additionally, almost all household that live along this section are located between the roundabout at “Popova” street and the roundabout at the settlement “Đuranović”. Taking into account a case similar to the abovementioned, the additional distance that has to be travelled between these two roundabouts would be enough to make a circle around the Planet Earth only once, which represents a significant reduction compared to 2.5 circles around the Earth, as per opinion of the Montenegrin Transport Administration.

11	Construction of the Boulevard Tivat Airport-Jaz should be carried out in the way that a town boulevard , with a 50km/h speed limit is constructed in settlements, primarily in Radanovici and Lastva Grbaljska, so that internal communication in Grbalj could be preserved. It is necessary to build roundabouts in Radanovici, whereby they should be built in front of the Home Store “Zecanka” and at the intersection “Đuranović”, which would thus be built at the beginning and the end of the settlement, while construction of roundabouts or intersection with pedestrian crossings should be envisaged between these locations. Intersection in front of the Elementary School “Nikola Đurković” is especially important because it represents a centennial intersection on the road from Kotor to Budva, to which the roads to Gornji and Donji Grbalj are connected. We deem that it is much better to preserve the intersection at the location of the current intersection at “Popova” street. In this way, demolition of the house owned by the household Nikaljevic would be avoided, whereby a steep inclination of the access point to the roundabout at “Popova street” would be avoided as well.
12	When it comes to clarification regarding the Urban Planning document for Lastva Grbaljska, it cannot be accepted because no one has yet declared it as invalid for the entire section, while the Spatial Plan of Montenegro does not regulate the details on site.
13	In Item 4 (four) you say that you complied with the provisions of the planning documents in respect to the road axis, which is not correct in terms of the Urban Planning documentation for Lastva Grbaljska, and you state that urban parcels must be complied with, but it is not clear whether the same criteria is applied in respect to Lastva Grbaljska.
14	Furthermore, you have stated that it is not possible to provide a design solution according to which the width of the separating island would be less than 2m, while the entire public of Montenegro may see that you are currently building a separating island which is less than 2m wide at the boulevard at the entrance to Podgorica, whereby pedestrian crossing will be provided at this road section as well. The explanation that a roundabout cannot be built at the entrance to “Glavatske kucice” is not only unacceptable, but it defied any logic (the only turn towards Donji Grbalj in the section from Radanovici to Jaz, west exist from Lastva Grbaljska for more than 200 houses, several business entities). We deem that it is necessary to build a roundabout at this section for safety reasons, in addition to the abovementioned reasons (there have been at least 10 fatal collisions at this section in the past period), thus we appeal that you do not design a n intersection with a separating island under no circumstances. We deem that it would be better if there was no intersection at all, than if a separating island is built in this section, and an example that we would like to provide is the boulevard in Podgorica, which stretches from “Roksped” to the Catholic Church in the settlement “Stari aerodrome”, whereby you are familiar with the number of collisions that have occurred in this section due to the fact that it is allowed to turn at the gaps in the separating islands.
15	When it comes to correction of the curve at “Glavatske kucice”, we would like to inform you that the conceptual design is not aligned with the Local plan for Lastva Grbaljska, and you should know that (looking from the direction from Kotor towards Lastva) the area around the road is owned by the Republic of Montenegro, whereby this strip reaches the width of 25m at certain locations, and the road in this section is designed in the way that it is going to be wider than the current road whereby private and urban parcels will be used for this purpose.
16	A roundabout at the “Terna” facility represents a roundabout to nowhere. There are no houses in that area and there won’t be any. The price of land has dropped to 5 EUR and no one wants to buy land in this area due to construction of the convector facility. You are referring to the

	Urban Planning document for Lastva Grbaljska and you state that an intersection is envisaged in this section, while you have previously explained that the Urban Planning documentation for Lastva Grbaljska is not aligned with the Spatial Plan of Montenegro.
17	Your explanation regarding the impossibility of construction of a roundabout at “Ceren” hill is simply incomprehensible, and it is clear to you that the Urban Planning documentation envisages construction of a large intersection at this location, considering the fact that this is the centre of the settlement and that there is a large number of houses along the left and the right side, and that it also represents a connection to Gornji Grbalj, which currently represents the alternative connection to the Grbalj area. It is very important to build a roundabout at this section for the reasons of safety because collisions at this section are frequent even now due to high speed of vehicles.
18	Explanation that the distance between roundabouts cannot be longer than 1km is unconvincing if we take into account that two roundabouts are envisaged to be built at the distance of less than 1km (intersection Bigova and business centre Lakovic). Additionally, it may be seen that two roundabouts are being built on the boulevard at the entrance in Podgorica, whereby distance between them is less than 1km, i.e. distance between these two roundabouts is 500m, and this section of the main road is important for Montenegrin transit. At the entrance to Bar, there are three (3) roundabouts at a section which stretches for 1km, and this is also a transit road at the moment.
19	One of the requirements made towards the President of Budva at the meeting that was attended by Mr Paraca was that two more roundabouts are designed in the section from the post office in Lastva Grbaljska to Jaz beach, which would be done in order to provide conditions for developing this area as suburbs of Budva.
20	Width of the traffic lane in the settlements should have the maximum width of 3m, while the maximum width of the separating island should be 1m. Local population of Grbalj deems that it is completely unacceptable to install wire fencing around the road which runs along the settlements because we want to preserve our road communication. We do not want to create separation through installation of the fence and thus create the environment in the section from Radanovici to Lastva Grbaljska that would primarily resemble concentration camps instead of a residential area.
21	All the abovementioned attitudes indicate that the investor and the designer do not comply with the valid planning documents for the subject section and they thus violate the legal provisions defined in respect to the road infrastructure and traffic safety.
22	We are aware of the fact that the existing main road represents the only transit road which is frequented by up to 25 thousand cars per day, and which was designed 60 years ago, thus it cannot remain in the existing condition in regards to its capacities, which means that it needs to be reconstructed or that a fast by-pass around Lastva Grbaljska to the roundabout in front of the Tivat Airport should be built (we do not know why this option was not even suggested as an idea in any of the spatial planning documents).
23	The local community accepts reconstruction – widening of the existing main road into a town boulevard which would provide conditions for increasing traffic flow, whereby the rights of the domestic population would not be revoked. Considering the fact that several thousand people live just along or in proximate vicinity to this road section and that it represents a suburban settlement with a constant tendency toward expansion, we cannot accept construction of a fast motorway under any circumstances, even though this was defined as part of the project. The very construction of this planned road would bring about a physical division in this part of the Kotor Municipality (small number of roundabouts

	which are mostly located outside of the areas of the existing connection points, double road barriers, fencing between the traffic lanes, the possibility of exit and entrance to the road only from in the right direction).
24	We are hereby notifying you that member of the Local community Gornji Grbalj, Lastva Grbaljska, Savina, Radanovici and Vranovici will be persistent in regards to both these requests and the requests that we have already submitted to you, and we are not willing to accept construction of the Boulevard unless all these requests are accepted. Instead, we will use all the legal means in order to fight for realisation of our rights, whereby the relevant institutions and organisations will be regularly informed about our actions.

Petition of 15/06/18 and TA response of 25/07/18

	<u>Initial Petition 15/06/18</u>	<u>Follow up 25/07/18</u>
36	In the part of LSL Grbalj II - in the section of Kavac, the route of the main road shown with the preliminary design deviates from the route given by the planning document. Also, the plan does not envisage construction of the roundabout in front of "Lakovic", while the conceptual design envisages construction of a roundabout at this location. According to the planning documentation, it is envisaged that width of the separating island should be 1m along the entire road section, thile the solution provided in the conceptual design envisages that its width should be 2m.	In regards to LSL Grbalj II – in the section "Kavca", route of the main road which has been defined in the conceptual design is not aligned with the road route which is defined in the planning document. Additionally, according to the planned, it is not envisaged to build a roundabout in front of "Lakovic", while the project defines a roundabout at this section. A 1m wide separating island has been defined to be built along the entire road section, while the project defines the width of 2m.
37	In the part of DUP Radanovici - the project shows two roundabouts, along Popova Street, and one at the restaurant "Bokeljska kuzina", which are foreseen by the planning document. Also, along the entire length of the road the dividing strip is planned. According to the planning documentation, the separating island should be 1m wide and, while the envisaged width of the separating island according to the design is 2m.	In regards to DUP Radanovici – the project envisages two roundabouts, one at "Popova" street and one in front of the restaurant "Bokeljska kuzina", while these roundabouts have not been defined in the planning document. Additionally, it is planned to build a 1m wide separating island along the entire road section, while the solution provided in the conceptual design defines the width of 2m.
38	In the part of LSL, Grbalj I-the project envisages construction of a roundabout in the area of Lastva, which is not foreseen by	In regards to LSL Grbalj I – the conceptual design envisages construction of a roundabout in the section of Lastva, whereby this roundabout is not defined

	the planning documentation. Separate strips according to the plan width 1m, and according to the project 2m.	in the planning documentation. According to the plan, width of the separating island is 1m, while the conceptual design envisages a 2m-wide separating island.
39	In the section of UPN - Lastva Grbaljska - 4 traffic lanes are shown in the project, while 3 traffic lanes are planned according to the planning documentation. The separating island is not envisaged according to the planning documentation, while the solution provided in the conceptual design envisages construction of a 2m wide separating island.	In regards to UPN Lastva Grbaljska – the conceptual design envisages 4 traffic lanes, while the plan envisages construction fo 3 traffic lanes. The separating island is not included in the plan, while the separating island defined in the conceptual design is 2m wide.

Initial Petition of 24/02/18 and TA Response to Petition 04/07/18

	Petition 24/02/18	TA Follow up 04/07/18
General Comments		
40	The highway should be reconstructed into the Boulevard, not into a fast transit route, but to be a real city boulevard-city street that will provide opportunities for development and a normal life.	The subject road is being reconstructed into a boulevard type of road, which is purported by the provisions defined in the Spatial Plan of Montenegro by the fact that a corridor of “fast motorway” is defined for transit traffic, whereby this corridor runs along the hinterland of the coastal towns. The reconstructed road will take into account the existing settlements and commercial objects along the road route and special effort will be invested in minimizing any disturbances or nuisance. Speed limits will be defined in accordance with the surrounding areas of the subject road, whereby lower speed limits will be defined in the populated areas. In this way, traffic speed management will be ensured in the built-up areas and measures will be implemented in order to ensure safe transport and movement of the endangered road users.
41	That the construction of the Boulevard should not abolish the acquired rights but that our communities communicate safely every day and navigate with as little turning and waste of time as possible. Also, that the design should be performed so that we do not lose our rights that we have had	When it comes to the request of the local community regarding safe communication along the future road, we would like to remind you that a Traffic Safety Audit has been done by an EBRD expert and the results of this audit have been sent to the designer for approval.

	so far and that its design does not jeopardize the functioning of already existing commercial and business facilities.	
42	To take maximum possible measures in order to avoid demolition of buildings and entry into private properties where there is right of way and a perimeter of undeveloped space.	Construction of the Main Road with a separating island is going to provide conditions in which there will be less points at which the vehicles can turn around. This will bring additional travel time, but it will also provide conditions for a controlled left turn and U-turn at the roundabouts, along with right-only entrances and right exit lanes at small intersections, which has significant importance in regards to road safety, taking into account that these conditions reduce the possibility of collision at the turning points along the designed road. When it comes to the request related to avoid jeopardizing the functioning of the industrial and business objects, all the objects which have legal access (construction permit and traffic approval) to the existing road are not going to be jeopardized in any way through the planned reconstruction, thus these objects are planned to be provided with access, and the same will be done for all the residential objects which have access to the main road at the beginning of reconstruction, thus these access roads have been defined in the project documentation or they will be constructed during the construction phase.
43	To design the present center line of the highway to be the middle of the future Boulevard, in order to treat the property of the citizens equally on both sides, except where such course of action would cause demolition of objects.	When it comes to the request related to avoiding demolition of objects, all the EBRD experts which have been in Montenegro so far are aware of the two objects which are going to be demolished, and it was not possible to avoid this course of events during development of the project documentation due to spatial constraints.
44	The traffic lanes should be 3m wide through populated areas, which is in accordance with the European regulations, where the speed limit is 50km/h.	Provisions regarding axis of the future road (the axis has been precisely defined in the planning documentation), defined in the planning documents, have been complied with. Compliance with the axis defined in the planning documentation was conditioned by the fact related to forming of urban parcels (urbanization of the entire section from Tivat Airport to Jaz beach). Any realignment of the axis would mean that individuals would be given special advantages, which is absolutely unacceptable, and which would provide the other with grounds for following this negative example.

45	That the separating island which is going to be built in our settlements should be 1m wide in order to provide wider sidewalk.	Width of the traffic lanes along the entire section of the boulevard from Jaz to Ariport has been unified, and it was defined that it will be 3.25m wide. We would like to remind you that the planning documentation for Kotor Municipality stipulated that the width of the traffic lane should be 3.5m. The correction of the width of the traffic lane was agreed with the designer, in line with the suggestions provided by the local community, with the aim of complying with the design standards along the entire road section.
46	All our general requirements can be found as examples of many locations in Montenegro, including newly constructed boulevards and roads.	It is not possible to design the separating island in the way that its width is less than 2m, and as it has been already mentioned several times, this is based on satisfying the traffic safety requests, installation of traffic signalization, guardrails, lighting, installations, etc. Additionally, it should be noted that in case when it is planned to have pedestrian crossings across the road section, the separating island should be wide enough for providing pedestrians with adequate safety conditions while waiting to cross the street. For this purpose, the central island in which it is suggested to have pedestrian crossings, should ideally have the width of at least 2m.
Comments regarding design of roundabouts		
47	We are seeking to design a roundabout at Zecanka department store, as a new road has been built in the meantime, linking the Village of Gomjeg Grblja with the main road.	Making reference to width of traffic lanes and separating islands at some other boulevards is not applicable, nor do we want to follow other examples, but we are simply complying with the Spatial Plan of Montenegro as the principal spatial planning document and all the project documentation has been aligned with it.
48	To design a roundabout at the Radanovici Primary School and not at the Bokeljska kuzina restaurant. At school, we especially require construction of a roundabout for safety reasons, since that would guarantee us that everyone must reduce the speed in this area, while at the same time providing the main communication between Gomji and Donji Grbalj, which has been there for centuries.	Designing a roundabout in front of “Zacanka” would require demolition of this object, but additional analysis will be done in order to try to find a solution which would enable construction of a roundabout at this location.
49	To design a roundabout at the end of our settlement, that is, at the Djuranovica house where roads are connected to all four sides, in order to enable communication of all their inhabitants and	Request related to designing an additional roundabout at the end of the settlement Radanovici is not justified since a roundabout which is going to have the same purpose has been defined for the location Tresanjski mlin.

	to prevent unnecessary travelling to Lastva grbaljska just for the sake of making a turn towards Kotor.	
50	To design a roundabout at the Tresanjski mill.	When it comes to the location “Tresanjski mlin”, a roundabout and a 4-way intersection have been designed in the area of 200m from the location.
51	To design a roundabout midway between the Tresanjski mill and Glavatska houses, i.e., at Gudevo polje near the bridge.	The request related to construction of an additional roundabout between “Tresanjski mlin” and “Glavatske kucice” will be reconsidered in the phase of additional development of the project documentation.
52	To remove the rubble at the location of the former Lecica House, as it is located next to the present highway and now threatens traffic safety at that road section	Removal of debris at the former location of Lecic’s house is not planned, taking into account that it is located at a private property, and the road axis has been precisely defined in the planning documentation.
53	To design a roundabout at the at the entrance to Glavatske kucice and to make a connecting road to the new road which was made for the Italy undersea cable.	In line with the planning documentation, a 4-way intersection is planned to be built at the location “Glavatske kuce”. Roundabout towards the “Terna “facility (electrical energy cable) was defined in accordance with the planning documentation and it is not going to be relocated to other locations.
54	As far as Kotor is concerned, looking in the direction towards Kotor, the curve located at this section should be straightened because there have been many crashes and fatal car accidents at this location, and this road area is too wide.	Radius of the curve in the section “Glavatske kuce” was defined in the planning documentation, thus reducing or increasing the radius may cause dissatisfaction of the location population (there are descriptions in which the designer and the MTA are being threatened that criminal charges will be raised against them). There were no objections to the subject curve in the RSA report. It is suggested to build a roundabout at this location and thus traffic speed will be reduced at this location, i.e. in proximity to the curve.

<p>55</p>	<p>To design a roundabout at Ceren Hill, since it is planned to build a large intersection at this location – according to our Urban Spatial Plan.</p>	<p>The suggestion related to construction of an additional roundabout at the turn to settlement Ceren is not justified, thus it is planned to make two separate connections at this location. Levelled intersections or gaps in the separating islands are not recommended to be used on the reconstructed boulevard type road, due to road safety.</p>
<p>56</p>	<p>To design a roundabout at the location of the Post Office in Lastva.</p>	<p>Design of the roundabout in front of the post office in Lastva has been defined in the planning documentation, thus it also represents an integral part of the project documentation.</p>