

## Kabobo-Luama Protected Area Landscape Management

### Basic Information

**GEF ID**

10242

**Countries**

Congo DR

**Project Title**

Kabobo-Luama Protected Area Landscape Management

**GEF Agency(ies)**

UNDP

**Agency ID**

UNDP: 6179

**GEF Focal Area(s)**

Biodiversity

**Program Manager**

Jean-Marc Sinnassamy

# PIF

## CEO Endorsement

Part I – Project Informatic

### Focal area elements

1. Does the project remain aligned with the relevant GEF focal area elements as presented in PIF (as indicated in table A)?

Secretariat Comment at CEO Endorsement Request

April 30, 2021

Addressed.

April 15, 2021

You included the ratings of 1 both for the Rio Markers on CCM and CCA.

It seems surprising for a BD project. Both CCM and CCA should be 0 in our view. Please, correct or explain.

Agency Response

Answer to April 15, 2021

This has been corrected, the Rio Markers in Section G. Project Taxonomy have been set to 0.

### Project description summary

2. Is the project structure/design appropriate to achieve the expected outcomes and outputs as in Table B and described in the project document?

Secretariat Comment at CEO Endorsement Request Yes.

Agency Response

**3. If this is a non-grant instrument, has a reflow calendar been presented in Annex D?**

Secretariat Comment at CEO Endorsement Request NA

Agency Response

**Co-financing**

**4. Are the confirmed expected amounts, sources and types of co-financing adequately documented, with supporting evidence and a description on how the breakdown of co-financing was identified and meets the definition of investment mobilized, and a description of any major changes from PIF, consistent with the requirements of the Co-Financing Policy and Guidelines?**

Secretariat Comment at CEO Endorsement Request

Yes, cofinancing is adequately documented and explained.

The level of cofinancing is relatively low for a GEF7 project, but we can understand the difficulty to raise more cofinancing in this remote landscape.

Cleared.

**Agency Response**

**GEF Resource Availability**

**5. Is the financing presented in Table D adequate and does the project demonstrate a cost-effective approach to meet the project objectives?**

**Secretariat Comment at CEO Endorsement Request**

Cleared (even if we find the budget limited for such important landscape).

Cleared.

**Agency Response**

**Project Preparation Grant**

**6. Is the status and utilization of the PPG reported in Annex C in the document?**

**Secretariat Comment at CEO Endorsement Request**

April 15, 2021

There is an annex C with the status of utilization of the PPG.

**Agency Response**

## Agency response

### Core indicators

#### 7. Are there changes/adjustments made in the core indicator targets indicated in Table E? Do they remain realistic?

##### Secretariat Comment at CEO Endorsement Request

April 15, 2021

The expected targets include:

- 667,305 ha of protected areas under improved management effectiveness (1.2) with the Kabobo Wildlife Reserve (147,710 ha), the Luama-Katanga Hunting Reserve (230,351 ha), and the Ngandja Nature Reserve (289,244 ha);

- 154,000 ha of terrestrial landscapes under improved management to benefit biodiversity (4.1).

15,000 beneficiaries are considered with 50% of female

##### Agency Response

#### art II – Project Justification

#### 1. Is there a sufficient elaboration on how the global environmental/adaptation problems, including the root causes and barriers, are going to be addressed?

##### Secretariat Comment at CEO Endorsement Request

Yes

##### Agency Response

**2. Is there an elaboration on how the baseline scenario or any associated baseline projects were derived?**

**Secretariat Comment at CEO Endorsement Request**

Yes

**Agency Response**

**3. Is the proposed alternative scenario as described in PIF/PFD sound and adequate? Is there sufficient clarity on the expected outcomes and components of the project and a description on the project is aiming to achieve them?**

**Secretariat Comment at PIF/Work Program Inclusion**

Yes

**Agency Response**

**4. Is there further elaboration on how the project is aligned with focal area/impact program strategies?**

**Secretariat Comment at CEO Endorsement Request**

Cleared.

The project is aligned with the GWP framework and the BD1.2a objective to mainstream BD across sectors as well as landscapes and seascapes through Global Wildlife Program to prevent extinction of known threatened species and the BD2.7 to address direct drivers to protect habitats and species and Improve financial sustainability, effective management, and ecosystem coverage of the global protected area estate.

**Agency Response**

**5. Is the incremental reasoning, contribution from the baseline, and co-financing clearly elaborated?**

**Secretariat Comment at CEO Endorsement Request**

Yes

**Agency Response**

**6. Is there further and better elaboration on the project's expected contribution to global environmental benefits or adaptation benefits?**

**Secretariat Comment at CEO Endorsement Request**

Yes. The project may also generate areas under SLM at one point (4.3). to be confirmed in the PIRs.

**Agency Response**

**7. Is there further and better elaboration to show that the project is innovative and sustainable including the potential for scaling up?**

**Secretariat Comment at CEO Endorsement Request**

April 30, 2021

Addressed.

**April 15, 2021**

Not fully.

The project is (relatively) innovative in this province with a participative approach centered on Indigenous Peoples and Local Communities. Sustainability is explored with the operationalization of the ICCN office in the Tanganyika province and different financing options, including REDD+.

- Please, provide a better reasoning for the potential for scaling up (elsewhere in the Tanganyika province and beyond)

## **Agency Response**

**Answer to April 15, 2021**

The section on potential for scaling up has been expanded and strengthened by altering the paragraph 115 on page 35 of the PRODOC as follows:

“The gazettement of Kabobo was inspired by the participatory zoning of the Okapi Wildlife Reserve and the participatory zoning of Itombwe Nature Reserve (Brown, 2010; D. Kujirakwinja et al., 2018; Deo Kujirakwinja et al., 2010). As such, Kabobo benefited from lesson learned from both protected areas to develop its participatory gazettement process. In addition, the proposed governance style of Kabobo is based on the inclusion of communities and local stakeholders in the decision-making in the management of protected areas. The practical experience with the governance of Kabobo has been used to establish three CFCLs (Concessions Forestières des Communautés Locales) in the same province and will be used to inform the ongoing consultations for the gazettement of the Oku Wildlife Reserve in Maniema. In addition, we expect to use the same community-based approach to support the provincial government to set up CFCLs in Tanganyika Province. Finally, we hope that the implementation of the integrated management and interventions in Kabobo will generate enough knowledge and lessons that could inspire the ICCN to implement the same approach in other protected areas throughout the country. An important policy in this sense is the National Strategy for Community Conservation (2016-2021) that is already partly aligned with the project approach of engaging communities in PA management. This strategy will be reviewed in the year 2021 with involvement of WCS, and this will be an opportunity to further strengthening community engagement in conservation in this key policy. The sustainability and upscaling of this community-based approach will also be supported by the project through the tools that will be developed, such as training programmes, databases, development plans and business plans. The sharing of these tools and experiences will be supported by the knowledge management and communications plans under this project. The ICCN protected area network and the WCS partner network provide also significant opportunities for replication. Moreover, there are ongoing discussions to include Tanganyika province in the FINAREDD program that would again provide increased opportunities for the upscaling of community-based approaches to forest and biodiversity conservation.”



## **Project Map and Coordinates**

**Is there an accurate and confirmed geo-referenced information where the project intervention will take place?**

### **Secretariat Comment at CEO Endorsement Request**

Yes.

### **Agency Response**

## **Child Project**

**If this is a child project, is there an adequate reflection of how it contributes to the overall program impact?**

### **Secretariat Comment at CEO Endorsement Request**

Yes, especially the GWP component 1 (conserve wildlife and enhance habitat resilience), component 2 (promote wildlife-based and resilient economies), and component 3 (combat wildlife trafficking). Activities also target the components 4 (reduce demand) and 5 (coordinate an enhance learning).

Cleared.

### **Agency Response**

## **Stakeholders**

**Does the project include detailed report on stakeholders engaged during the design phase? Is there an adequate stakeholder engagement plan or equivalent documentation for the implementation phase, with information on Stakeholders who will be engaged, the means of engagement, and dissemination of information?**

**Secretariat Comment at CEO Endorsement Request**

Yes.

- The stakeholder consultations and engagement activities during the project preparation are reported.
- A Stakeholder Engagement Plan is proposed.

**Agency Response**

**Gender Equality and Women's Empowerment**

**Has the gender analysis been completed? Did the gender analysis identify any gender differences, gaps or opportunities linked to project/program objectives and activities? If so, does the project/program include gender-responsive activities, gender-sensitive indicators and expected results?**

**Secretariat Comment at CEO Endorsement Request**

Yes.

**Agency Response**

**Private Sector Engagement**

## Private Sector Engagement

If there is a private sector engagement, is there an elaboration of its role as a financier and/or as a stakeholder?

### Secretariat Comment at CEO Endorsement Request

The private sector will not be very involved in this project. The justification is given.

Cleared.

### Agency Response

## Risks to Achieving Project Objectives

Has the project elaborated on indicated risks, including climate change, potential social and environmental risks that might prevent the project objectives from being achieved? Were there proposed measures that address these risks at the time of project implementation?

### Secretariat Comment at CEO Endorsement Request

Yes, including COVID-19 risks with measures at short-term, medium-term, and long-term opportunities.

Cleared.

### Agency Response

## Coordination

**Is the institutional arrangement for project implementation fully described? Is there an elaboration on possible coordination with relevant GEF-financed projects and other bilateral/multilateral initiatives in the project area?**

### Secretariat Comment at CEO Endorsement Request

**April 30, 2021**

Addressed.

**April 15, 2021**

We take note the institutional arrangements: We understand that the government agreed to the designation of WCS as an executing partner (or Responsible Party, RP, in the project document). A letter signed from the GEF OFP is provided. The explanation is given that ICCN is not fully operational in the new Tanganyika region and the office in South Kivu is more oriented on other sites. We take note of the budget assigning the RP to some outputs. We understand that 78% of the project budget will be transferred to WCS. However, we are not easily seeing the list of outputs, activities, and the considered budget. Please provide the annex C entitled CSO Technical and Financial Proposals.

- In the portal, the Ministry of Environment & Sustainable Development and the Tanganyika Provincial Government are also mentioned as executing partners, but the diagram (see section 112 of the project document) only includes WCS and ICCN. Please, detail the role of the provincial government and the Ministry as executing partners. If needed, update the item related to executing partners.

### Agency Response

**Answer to April 15, 2021**

1. Annex C – Technical and Financial Proposal of the Responsible Party

The Technical and Financial Proposal of WCS has been added as Annex C to the Draft Responsible Party Agreement in Annex 14 of the PRODOC.

2. Role of Ministry and Provincial Government as Executing Partners

To explain the role that the Ministry and the Provincial Government will play in project execution, the following paragraph has been inserted as paragraph 137 on page 43 of the PRODOC:

“The Ministry of Environment & Sustainable Development will contribute to the implementation of the project through its affiliate institution ICCN, the state agency in charge of protected areas, and will regularly updated about the implementation. It will also play a key role for any upscaling of the project approach beyond the specific protected areas included in the project. The Provincial Government of Tanganyika Province, which is locally elected, will represent the local population of the province in the SC and will be represented in project meetings at provincial level. Both the Ministry and the Provincial Government of Tanganyika are represented in the Project Steering Committee.”

## **Consistency with National Priorities**

**Has the project described the alignment of the project with identified national strategies and plans or reports and assessments under the relevant conventions?**

### **Secretariat Comment at CEO Endorsement Request**

Yes, the significance of the Kabobo-Luama landscape Tanganyika is emphasized in the DRC National Biodiversity Strategy and Action Plan (NBSAP). The government included this project as a priority under the GEF initially in GEF6 and confirmed in GEF7.

### **Agency Response**

## **Knowledge Management**

**Is the proposed “Knowledge Management Approach” for the project adequately elaborated with a timeline and a set of deliverables?**

### **Secretariat Comment at CEO Endorsement Request**

Yes.

**Agency Response**

## **Monitoring and Evaluation**

**Does the project include a budgeted M&E Plan that monitors and measures results with indicators and targets?**

**Secretariat Comment at CEO Endorsement Request**

Yes

**Agency Response**

## **Benefits**

**Are the socioeconomic benefits at the national and local levels sufficiently described resulting from the project? Is there an elaboration on how these benefits translate in supporting the achievement of GEBs or adaptation benefits?**

**Secretariat Comment at CEO Endorsement Request**

Yes, the Theory of Change is based on three pathways; one of them targets sustainable livelihoods development, reflected in the third project component.

**Agency Response**

## Annexes

### Are all the required annexes attached and adequately responded to?

#### Secretariat Comment at CEO Endorsement Request

**April 30, 2021**

- Project positions and terms of reference: cleared.

- Vehicles: we understand that WCS will provide three vehicles from cofinancing. We take note of the need and justification provided for the purchase of three 4x4 vehicles and three motorcycles. We find the justification acceptable. Cleared, including the operating costs.

Cleared.

**April 15, 2021**

Budget:

- Please explain the breakdown of the different project positions per component. As you know, it is expected that the coordination and management position be covered by the pmc. If part of these positions are covered by technical components, these functions should be reflected in the terms of reference. Please, clarify.

- Please, explain the strategy for the transport vehicles. The preference is to see vehicles provided by cofinancing. Please, provide this information. We may expect vehicles provided by the Ministry, ICCM, the Provincial government, WCS, and/or UNDP.

- Please, clarify the number of two-wheel and four-wheel vehicles and justify.

#### Agency Response

**Answer to April 15, 2021**

##### 1. Project positions

Project staff has been budgeted under the component under which their activities take place, or for management/coordination staff under PMC. A Financial Assistant (contracted by ICCN) will work 9 months per year on general financial management of the project (budgeted under PMC) and 3 months per year monitoring and supporting financial aspects of field activities, including supporting the implementation of the sustainable finance plan for protected areas to be created by the project. These 3 months per year have been budgeted under Component 4. The ToR of this position in Annex 6 has been amended to clarify this division of tasks. A project Technical Assistant (to be hired by ICCN) has been divided equally among the four Components since he or she will technically support the implementation of all four components as local representative of the ICCN Project Director. The ToR in Annex 6 has been revised to clarify that this position is focused

components as well as the support of the technical staff. The technical staff has been revised to clarify that the positions are based on the technical support and M&E of the field components. Other technical staff positions have been budgeted proportionally under the

components where those staff provide technical support to those components; for example the WCS Country Director will provide 1 month of support to Component 1, 2 months of support to Component 2, 3 months to Component 3 and 2 months to Component 4 and this time has been proportionally budgeted under those components. Administrative WCS staff have been budgeted under PMC.

## 2. Vehicles

The project proposes to procure the following vehicles from GEF resources: one Hilux double cabin pickup (\$25,000) and one motorcycle (\$5500) for Ngandja, to be used by ICCN; one Hilux double cabin pickup (\$25,000) for Kabobo, to be used by WCS; and one Hilux double cabin pickup (\$25,000) and two motorcycles (2 x \$5500) for Kalemie, to be used by WCS. The total of vehicles to be procured from GEF resources would thus be 3 Hilux and 3 motorcycles, all for field use. The initially proposed vehicles (RAV4) for the coordination in Kinshasa has been removed from the budget and from Annex 19, and the corresponding funds have been converted into Travel for the project coordination (line 52).

Co-funding for the vehicle acquisitions will be provided as follows: In addition to the afore-mentioned vehicles to be procured from GEF resources, WCS will make available for project implementation one existing Hilux and will procure, from own or other donor resources, two additional Hilux vehicles for use in the Kabobo and Kalemie project sites for use for project activities. These additional vehicles are mentioned in a revised letter of co-finance of WCS in Annex 17 of the PRODOC.

Justification for the use of GEF resources for the acquisition of vehicles: Transport conditions in the Kabobo-Luama Landscape are very difficult and work in the landscape has been operational with very limited mobility. However, with the increase of operations through this project, there will be an increased need for mobility, especially to support the community engagement activities. It is proposed that the GEF would contribute to those transport needs through the funding of three vehicles and three motorcycles for field use by ICCN and WCS. This will cover only part of the transport needs and will be complemented by one existing vehicle and two further vehicles to be procured by WCS during the project duration and for use in the project by WCS from non-GEF resources, as stated in their letter of cofinance. No vehicles will be procured from GEF resources for the coordination requirements in Kinshasa – these needs will be met through existing vehicles of the IP, RP and, where necessary, UNDP.

## Project Results Framework

Secretariat Comment at CEO Endorsement Request Yes

Agency Response

GEF Secretariat comments



**Secretariat Comment at CEO Endorsement Request**

**Agency Response**

**Council comments**

**Secretariat Comment at CEO Endorsement Request Yes (Germany and USA).**

**Agency Response**

**STAP comments**

**Secretariat Comment at CEO Endorsement Request NA**

**Agency Response**

**Convention Secretariat comments**

**Secretariat Comment at CEO Endorsement Request NA**

**Agency Response**

## **Other Agencies comments**

**Secretariat Comment at CEO Endorsement Request** Comments from the GWP Steering committee are addressed.

**Agency Response**

## **CSOs comments**

**Secretariat Comment at CEO Endorsement Request NA**

**Agency Response**

## **Status of PPG utilization**

**Secretariat Comment at CEO Endorsement Request**

**April 30, 2021**

Addressed.

**April 15, 2021**

There is an annex C with the status of utilization of the PPG. However, we would have been pleased to find a list of assessments and studies financed during the PPG, eventually with links to access them. Please, complete.

**Agency Response**

**Answer to April 15, 2021**

A table listing all the reports that have been prepared during the PPG and their respective locations where they can be accessed has been inserted in Annex C of the CEO ER.

**Project maps and coordinates**

**Secretariat Comment at CEO Endorsement Request Yes**

**Agency Response**

**Does the termsheet in Annex F provide finalized financial terms and conditions? Does the termsheet and financial structure address concerns raised at PIF stage and that were pending to be resolved ahead of CEO endorsement? (For NGI Only)**

**Secretariat Comment at CEO Endorsement Request**

NA

**Agency Response**

**Do the Reflow Table Annex G and the Trustee Excel Sheet for reflows provide accurate reflow expectations of the project submitted? Assumptions for Reflows can be submitted to explain expected reflows. (For NGI Only)**

**Secretariat Comment at CEO Endorsement Request NA**

## Agency Response

**Did the agency Annex H provided with information to assess the Agency Capacity to generate and manage reflows? (For NGI Only)**

### Secretariat Comment at CEO Endorsement Request NA

#### Agency Response

**UNDP Agency response to GEF Sec comments from May 6, 2021** under section "Secretariat Comment at CEO Endorsement Request:

1. Planned starting date: has been changed to 10 July 2021. Planned end date and dates for MTR and TE have been changed accordingly.

2. UNDP support services: was approved by GPU Manager by email; Jean-Marc will respond

3. Names of co-financiers: the names of the co-financiers are indicated in Table C in the CEO ER and also in the Financing Plan and Confirmed Co-financing on page 2 of the PRODOC

4. Translation costs have been removed from the PRODOC budget line 47 budget notes

5. Budget:

i. The project proposes to procure the following vehicles from GEF resources: one Hilux double cabin pickup (\$25,000) and one motorcycle (\$5500) for Ngandja, to be used by ICCN; one Hilux double cabin pickup (\$25,000) for Kabobo, to be used by WCS; and one Hilux double cabin pickup (\$25,000) and two motorcycles (2 x \$5500) for Kalemie, to be used by WCS. The total of vehicles to be procured from GEF resources would thus be 3 Hilux and 3 motorcycles, all for field use. The initially proposed vehicles (RAV4) for the coordination in Kinshasa has been removed from the budget and from Annex 19, and the corresponding funds have been converted into Travel for the project coordination (line 52).

Co-funding for the vehicle acquisitions will be provided as follows: In addition to the afore-mentioned vehicles to be procured from GEF resources, WCS will make available for project implementation one existing Hilux and will procure, from own or other donor resources, two additional Hilux vehicles for use in the Kabobo and Kalemie project sites for use for project activities. These additional vehicles are mentioned in a revised letter of co-finance of WCS in Annex 17 of the PRODOC.

Transport conditions in the Kabobo-Luama Landscape are very difficult and work in the landscape has been operational with very limited mobility. However, with the increase of operations through this project, there will be an increased need for mobility, especially to support the community engagement activities. It is proposed that the GEF would contribute to those transport needs through the funding of three vehicles and three motorcycles for field use by ICCN and WCS. This will cover only part of the transport needs and will be complemented by one existing vehicle and two further vehicles to be procured by WCS during the project duration and for use in the project by WCS from non-GEF resources, as stated in their letter of cofinance. No vehicles will be procured from GEF resources for the coordination requirements in Kinshasa – these needs will be met through existing vehicles of the IP, RP and, where necessary, UNDP.

ii. Project staff has been budgeted under the component under which their activities take place, or for management/coordination staff

under PMC. A Financial Assistant (contracted by ICCN) will work 9 months per year on general financial management of the project (budgeted under PMC) and 3 months per year monitoring and supporting financial aspects of field activities, including supporting the implementation of the sustainable finance plan for protected areas to be created by the project. These 3 months per year have been budgeted under Component 4. The ToR of this position in Annex 6 reflect this division of tasks. A project Technical Assistant (to be hired by ICCN) has been divided equally among the four Components since he or she will technically support the implementation of all four components as local representative of the ICCN Project Director. The ToR in Annex 6 clarifies that this position is focused on the technical support and M&E of the field components. Other technical staff positions have been budgeted proportionally under the components where those staff provide technical support to those components; for example the WCS Country Director will provide 1 month of support to Component 1, 2 months of support to Component 2, 3 months to Component 3 and 2 months to Component 4 and this time has been proportionally budgeted under those components. Administrative WCS staff have been budgeted under PMC.

The boat man has been removed from the budget. Instead, we are proposing to budget for a full-time mechanic (60 months, split proportionally among the components) to service project vehicles, boats and other equipment considering that in our experience, insufficient service is the prime cause for early degradation of expensive project equipment, especially in remote locations and under difficult field conditions. In line 45, the boat man (10 months) has been removed and the corresponding amount (\$5,700) been added to communication materials in line 47, where especially in the last project year a sufficient amount of funding for publications and communication materials is desirable.

iii. The Project Manager is budgeted under PMC (43 months – line 56) and under Component 4 (17 months – line 45). The latter is justified by the PM's role in M&E of the project activities as reflected in the ToR for that position (Annex 6). The PM is not charged to components 1-3. However, each component has a component manager charged to that component (budget lines 5, 22, 32, 45) but these are technical positions tasked with the technical implementation of their respective components, as reflected in their respective ToRs (Annex 6), and not involved in the administrative management of the project as a whole.

## **EFSEC DECISION**

## **RECOMMENDATION**

**Is CEO endorsement recommended? (applies only to projects and child projects)**

### **Secretariat Comment at CEO Endorsement Request**

**May 11, 2021**

1. Corrected.
2. Confirmed. The implementation arrangements and the role of each partner (Ministry, local government, ICCN, and WCS) was discussed and agreed by PM and GPU manager. Confirmed.
3. Addressed.
4. Addressed.

## 5. Budget:

I. The need and purchase of vehicles were already raised in the technical review on April 15, 2020, with responses and changes in cofinancing on April 30, 2021 (see the first item under the annexes about the budget). The response was cleared. We confirmed our agreement.

II and III: We take note the explanations provided by the GEF Agency and find them acceptable. Cleared.

### May 6, 2021

Please address the following comments from the Control Quality:

1. Expected Implementation Start date has already past - please ask the Agency to amend for a more realistic date, otherwise the project would necessarily need to be extended later on and the reports will not be accurate.
2. In Section 6 - Institutional Arrangement and Coordination, it is mentioned that "the Implementing Partner and GEF OFP have requested UNDP to provide support services to the project ...". However, neither PM's clearance nor GPU Manager's approval were found in the Review Sheet or in Portal (Note: I will respond to this comment as it was approved by GPU Manager by email, but not reflected in the portal).
3. On co-financing: Please provide the names of the co-financiers – for each source of co-financing – in the table C.
4. Translations on the M&E budget are not covered by GEF resources –
5. On budget:
  - i. There are 3 vehicles + 1 motorbike + 1 boat + associated costs for (underestimate) \$288,000 (8.1% of the GEF budget). The preferred practice is for these items to be covered by the co-financing resources.
  - ii. Technical Assistant – Financial Assistant – Project Manager (partially) - Boat Man salaries are charged to M&E - the first three must be charged to PMC. The Boat Man would preferable be charged to co-financing resources.
  - iii. Project Manager (partially) salary charged to component 1 – must be charged to PMC

### April 30, 2021

All comments have been addressed. The project is recommended for CEO endorsement and Council consultation.

### April 15, 2021

Not yet: Please address the comments above.

## Review Dates

Secretariat Comment at CEO Endorsement    Response to Secretariat comments

First Review	4/15/2021
Additional Review (as necessary)	4/30/2021
Additional Review (as necessary)	5/6/2021
Additional Review (as necessary)	5/11/2021
Additional Review (as necessary)	

**CEO Recommendation**

**Brief reasoning for CEO Recommendations**

April 15, 2021

Addressed.

Please resubmit and include the Checklist for CEO Endorsement Template duly filled out for this project. Thanks.