

# **PRESERVE Indonesia: Mobilizing Blended Biodiversity Finance for Community-Led Preservation Areas (Areal Preservasi/OECMs)**

Review PPG Request and Make a recommendation

## **Basic project information**

**GEF ID**  
12210  
**Countries**  
Indonesia  
**Project Name**  
PRESERVE Indonesia: Mobilizing Blended Biodiversity Finance for  
Community-Led Preservation Areas (Areal Preservasi/OECMs)  
**Agencies**  
UNDP  
**Date received by PM**  
1/14/2026  
**Review completed by PM**

**Program Manager**  
Jurgis Sapjanskas  
**Focal Area**  
Biodiversity  
**Project Type**  
GBFF

## **GEF-8 Project Preparation Grant request Review Sheet**

### **1. General Project Information / Eligibility**

a) Does the project meet the criteria for eligibility for GBFF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

Agency's Comments

### **II. Indicative Project Overview**

a) Is the project objective presented as a concise statement and clear?

b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective?

Secretariat's Comments

Agency's Comments

c) Are the components adequately funded?

d) Are the GEF Project Financing and Co-Financing contributions to PMC proportional (only for Multi-trust Funds PPGs with BD from the GEF Trust Fund)?

e) Is the PMC equal to or below 5% of the total GEF grant for projects of more than \$2 million or 10% for projects of less than \$2 million? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?

Secretariat's Comments

Agency's Comments

### **III. Project Rationale**

a. Does the project adequately describe the: (i) current situation/baseline conditions within the project geographic area or project thematic area; (ii) problem(s) that the project will address; (iii) goal and objectives of the project; and (iv) justification for the project intervention; and (v) expected results including the Global Environmental Benefits and an estimate of the project's contributions to the relevant biodiversity core indicators.

Secretariat's Comments

Agency's Comments

### **IV. Project Description**

- a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?
- b) Are the project components and activities identified in the theory of change adequately described.
- c) Is a list of stakeholders that will be involved in the project and their roles in the design and implementation of the project provided?
- d) Are the Specific Action Area(s) that the project is aligned with identified and an explanation provided on and how the project will support the achievement of the specific Action Area objective(s).

Secretariat's Comments

Agency's Comments

**V. Does the proposal adequately describe how the project meets the following criteria:**

- a) Potential to generate global environmental benefits (GEBs) (include a description of the GEBs the project will generate per the GEF-8 Core Indicators for biodiversity);
- b) Alignment with the National Biodiversity Strategies and Action Plans and/or National Biodiversity Finance Plans or similar instruments to identify national and/or regional priorities;
- c) The level of policy coherence and coordination across multiple ministries, agencies, the private sector, and civil society that the project aims to support;
- d) Whether the project will mobilize the resources of the private sector and philanthropies'; and
- e) Whether and how the project will engage with and provide support to IPLCs.

Secretariat's Comments

Agency's Comments

**VI. Project results indicators**

**Is the table correctly populated and consistent with the Project Description?**

Secretariat's Comments

Agency's Comments

**VII. Project Financing Tables**

- a) Are all the tables correctly populated?
- b) Are the indicative expected amounts, sources and types of co-financing consistent with the requirements of the Co-Financing Policy and Guidelines (only for projects with GEF TF components)?

Secretariat's Comments

Agency's Comments  
VIII. Project Endorsement

- a) Has the project been endorsed by the country's(ies) OFP and has the OFP at the time of PPG request submission name and position been checked against the GEF database?
- b) Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?
- c) Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?

Secretariat's Comments

Agency's Comments

IX. GEFSEC Decision

- a. Is the PPG recommended for technical clearance?
- b. Additional comments to be considered by the Agency during project preparation

Secretariat's Comments

JS 3/19/2026 - Congratulations, this PPG request has been selected by the CEO as part of the 5th GBFF selection round.

b- Please consider and/or address the following comments during project preparation:

1- While co-finance is not required, it is strongly encouraged. Given the project context, scope and focus, please consolidate co-financing during project preparation.

2- Please ensure coordination with (i) GEFID 11530 "Strengthening the integrated landscape management and governance for the conservation and sustainable use of forested areas important for biodiversity and ecosystem services (AIBDES) in Indonesia", which is also to contribute to the enabling environment for OECMs in Indonesia, and (ii) GEFID 12125 Enhanced Management of Indonesia's Marine Protected Areas (MPAs) Through the Critical Marine Habitat Facility (ICMHF), which is also to develop a financing window within IEF. Please ensure the CEO endorsement of this GBFF project makes clear the articulation with these two projects to avoid duplication, and the added-value of this new proposal.

3-Please ensure the CEO endorsement request of this GBFF project includes the funding selection/eligibility criteria for financing through the new AP/OECM window. Criteria should ensure the investments would focus on sites of global biodiversity significance, including in the four pilot areas to be supported by the project.

4-Please ensure the CEO endorsement request demonstrates the baseline capacity of IEF to develop and manage this funding window, and priorities/plans for further institutional strengthening via this project and Norway's support.

5- Please ensure the the CEO endorsement request includes a strategy for the capitalization of the new window.

6- Please also ensure the CEO endorsement request is specific on the blended finance instruments and financial structures that would be supported/developed through TA, which financial institution would deploy them, and with what source of funds. For financial instruments other than grants/reimbursable grants such as loans, guarantees, insurance, these would have to be designed with the direct involvement of the financial institutions/investors/DFIs that can put the money into the financing window/platform. For GBFF funds that may be deployed as performance-based grants or reimbursable grants, a term sheet would need to be provided that notably clarifies how reflows are triggered and how they will be managed by the project.

7 - Since submission, GBFF guidelines on supporting actions by IPLCs have been published (<https://www.thegef.org/council-meeting-documents/gef-gbff-05-inf-04>). Please follow these guidelines carefully during PPG implementation, taking care to involve IPLC representatives in co-designing relevant components and including IPLC institutions identified by IPLCs themselves. The CEO endorsement request is expected to provide evidence that the reported dollar amount to support actions by IPLCs for biodiversity was calculated according to the guidelines.

8 - Since submission, the GBFF Council adopted a new results framework for the GBFF ([https://www.thegef.org/sites/default/files/documents/2025-12/EN\\_GEF.GBFF\\_05.05\\_Results%20Framework%20of%20the%20GBFF.pdf](https://www.thegef.org/sites/default/files/documents/2025-12/EN_GEF.GBFF_05.05_Results%20Framework%20of%20the%20GBFF.pdf)). Please note this project will be requested to transition to this new results framework at its next best occasion, either the CEO endorsement request if submitted after July 1, 2026, or the first PIR. Please note that detailed guidelines for the new results framework will be released before July. New requirements include the provision of polygon data for the location of project interventions at CEO endorsement stage. In addition, projects' results frameworks are:

-encouraged to draw extensively in the headline, binary, component or complementary indicators of the KMGBF monitoring framework to better measure their contributions to the KMGBF goals and targets (<https://www.cbd.int/doc/decisions/cop-16/cop-16-dec-31-en.pdf>).

- requested, whenever feasible and relevant, to include indicators of biodiversity outcomes to complement and underpin the GBFF indicators

3/19/2026 -Thank you for the responses provided. For this project to be further considered in the selection round, please address the comments below and resubmit as soon as possible:

1- Thank you for the clarification on point 1. But please reflect in the log-frame that the new window is to be established under iBiofund. Currently it only refers to BPD LH and can be read as a window that would be separate from iBiofund:

2. Establishment of an AP/OECM financing platform (funding window) at BPDHLH (Indonesia Environmental Fund) (GBFF Action Area Four)	Technical Assistance	2. AP/OECM Financing Platform (funding window) at BPDHLH is established and mobilizes blended finance for community-led biodiversity conservation	2.1. AP/OECM financing platform (funding window) is established and operationalized at BPDHLH and offers flexible financing instruments.	GBFF	2,400,000.00	1,679,135.00
		<b>Indicators:</b>	2.2. AP/OECM financing platform (funding window) is capitalized via Private-Public Partnerships, co-investment agreements, CSR allocations, government and international donor funding.			
		AP/OECM Investment Plan formally approved within BPDHLH.	2.3. Respective BPDHLH and MoFor staff are trained on financial management & reporting for AP/OECM windows, appraisal of AP/OECM projects and management of safeguards.			
		>=5 distinct financing instruments are				

2-Thank you for the clarification. Please clarify in the PPG request itself, in the description of component 2, that GBFF resources will not be used to capitalize the window (output 2.2) and revise the language that lumps together finance from the window and project finance, when these two are separate:

conservation backed by blended finance can establish and sustainably manage Indonesia's new AP/OECMs. It will support the formal designation of priority AP/OECMs and their operationalization through multi-stakeholder forums for Essential Ecosystem Areas (KEE) in which the customary group/community plays a leading governance role (GBFF Action Area Two). Using resources channeled through the AP/OECM financing platform, the project will finance concrete measures that strengthen these forums, negotiate co-management arrangements, and ensure that Customary community and/or group have the authority and capacity to steward biodiversity-rich territories adjacent to existing conservation forests. Building on this governance foundation, the component will implement a

3a-Thank you for the clarification that GBFF funding would be used only as grants and technical assistance, but please:

-clarify in the PPG request itself that, in this project, GBFF funds will be used only in the forms of technical assistance and grants.

-clarify all the language that can be read as GBFF funds being used in forms other than grants to be specific on the source of funds and role of the GBFF resources in these blended finance pilots:

These pilots will test the instruments such as performance-based conservation agreements with customary groups, nature-based solutions for human-wildlife conflict risk mitigation, agroforestry and NTFP enterprises supported by revolving credit lines and value-chain partnerships, eco-tourism and blue-carbon/peatland restoration revenue models, and private conservation concessions backed by impact investment and risk guarantees. Lessons, tools, and transaction models emerging from these pilots will be systematically documented and disseminated to national partners, BPDHLH, and provincial

3b- The response to point 3 below refers to "with GBFF grant funds used selectively as the ?public? portion to underwrite risks, ensure safeguards, and demonstrate the viability of innovative, community?centered, biodiversity?positive investment models under the AP/OECM mechanism".

Please clarify what is meant by the use of GBFF funding "to underwrite risks". An instrument that ?underwrites? means that GEF resources would be used to guarantee a payment, which would classify as non-grant instrument, such as guarantee or other form of risk mitigation instrument, and for which UNDP, to our knowledge, does not meet the requirements set out in the in the GEF NGI policy.

3c - Please clarify what is meant by "ensure safeguards". GBFF resources should not be used to "ensure safeguards" in a particular blended finance transaction. Compliance with or ?ensuring? safeguards is usually part of the obligations of the borrower in a legal agreement between the lender and the borrower. In no case GEF resources should be used to guarantee the breach of safeguards by the borrower. Please confirm our understanding that, in relation to safeguards, the project would only support, through technical assistance, IBioFund and relevant stakeholders in establishing and enforcing appropriate safeguards standards for the AP/OECM

Financing Platform, but would not subsidize or guarantee the application of safeguards measures by the private sector.

6- Thank you for the response. Please also clarify in the PPG request itself the project increment compared to GEFID 11530 ?Strengthening the integrated landscape management and governance for the conservation and sustainable use of forested areas important for biodiversity and ecosystem services (AIBDES) in Indonesia? (FAO) which is also to contribute to the enabling environment for, and operationalization of, OECMs/APs in Indonesia. If this PPG request is selected, please ensure coordination with 11530.

2026/02/19 Dear Colleagues, thank you for this submission. For this project to be further considered in the selection round, please address the comment below and resubmit as soon as possible:

- In the Indicative Project Overview table, please include outcomes and outputs for the M&E component.

Kindly note the project selection process remains ongoing.

2026/02/27 Dear Colleagues, a set of additional comments has been provided by the reviewing team following the identification of the potential deployment of non-grant instruments. Please address the following comments and resubmit at your earliest convenience. Many thanks in advance.

1. Output 2.1: Please clarify what is meant by ?funding window/platform?. Please clarify the baseline on the IEF and the IBiofund, including the governance structure between IEF, IBioFund and the ?funding window? to be created under output 2.1. It is unclear whether this window relates to IEF or IBioFund or to both of them. If the window is not within the recently created IBioFund, please clarify the complementarity/alignment of the proposed new window and how duplication and competition for the same sources of public and private finance would be avoided.

2. Please clarify in the PPG request how GBFF funds are intended to be used, including whether it is foreseen that GBFF funds would be used to capitalize the ?funding window/platform? to be created through this project (output 2.1).

3. GBFF funds cannot be used in this UNDP-implemented project to deploy non-grant instruments in which UNDP has not the operational and technical capacity to operate and transact (e.g. credit lines, guarantees, etc.) given the provisions of the **GEF Non Grant Instrument (NGI) policy**. Unless another GEF implementing agency is used that qualifies as capable of using NGI, the PPG request should thus make clear that GBFF funds would only be used as technical assistance and/or to deploy grants, including performance-based grants or reimbursable grants only. The use of GBFF funds as technical assistance to establish the operational and financial framework for blended finance instruments pilots IS acceptable, if these pilots and instruments deploy public funding from sources other than GBFF.

4. If this project were to be selected in this GBFF selection round, clarity would need to be provided at CEO endorsement request stage on *the exact blended finance instruments and financial structures that would be supported/developed through TA, which financial institution would deploy them, and with what source of funds*. For financial instruments other than grants/reimbursable grants such as loans, guarantees, insurance, these would have to be designed with the direct involvement of the financial institutions/investors/DFIs that can put the money into the financing window/platform. For GBFF funds that may be deployed as performance-based grants or reimbursable grants, a term sheet would need to be provided that notably clarifies how reflows are triggered and how they will be managed by the project.

5. Please revise the co-financing figures. There is a reference to US\$25 million capitalization for component 2 and US\$6 million in total financing disbursed for Component 3. The numbers in the co-financing sections do not add up to these numbers. It is not clear how much private sector capital can be mobilized and what catalytic role the GBFF funding can have.

6. Noting the GEF-8 STAR MSP GEFID 12125, please clearly describe how the project activities included in this GBF PPG (if selected) would avoid overlap/double dipping with GEFID 12125 MSP, as many activities are similar, but for different IEF windows/sub-sectors, and how UNDP/IEF will maximize complementarities/efficiencies and prevent redundancy in the use of GEF STAR and GBFF resources if this PPG were to be awarded.

## Agency's Comments

19 March 2026

1. This has been addressed in the description in the overview and components.

2. Please see the revised component 2 description that clearly denotes how GBFF funds will be used to support the AP/OECM platform and beneficiary communities

3a) This has been clarified in Outputs 3.1 and 3.2

We have strived to separate the GBFF funding as TA and grants from the blended-financing instruments leveraged through the platform in the revised PIF. All new edits are highlighted in BLUE.

3b) By ?underwriting risks? in this context, we meant support to customary groups/IPLCs to access existing and potential financing instruments such as credit lines, results based payment or payment for ecosystem services. For greater clarity. We have now delineated the technical assistance that will be provided by the GBFF fund that will enable communities access and negotiate their interests in the financial instruments; from the actual blended finance/ other financial solutions that the project aims to develop and deploy through the BPD LH/ IBioFund. We trust that this is in line with the GEF NGI Policy.

3c- Thank you for the clarification. We confirm that your understanding is correct. In this project, GBFF resources will not be used to ?ensure safeguards? within any specific blended?finance transaction, nor will they be used to subsidize, underwrite, or guarantee the borrower?s compliance with safeguards requirements.

In the context of this project, references to ?ensuring safeguards? pertain only to technical assistance and capacity?building support for IBioFund and relevant stakeholders and beneficiaries of the fund. This support is limited to supporting the establishment of a robust safeguard framework at the platform level and enhancing institutional capacity among relevant stakeholders.

6- We have added some text- keeping in mind the word limitations- to illustrate the increment of PRESERVE project to the existing FAIO investment in GEFID 11530. The Government?s Preservation Area regulation provides a common platform for policy coherence in governing land use decisions in high biodiverse areas outside PAs. Additionally, the proposed investment supports the development of a long?term financing mechanism for biodiversity?compatible livelihoods through the IBioFund will help secure and extend the impacts of GEF ID 11530, ensuring greater sustainability of its investments.

13 March 2026

1#.

The project proposes that a new AP/OECM Funding Window be created and eventually fully operationalized within the Indonesia Biodiversity Fund (IBioFund). The "funding window/platform" referred to here represents a dedicated financing structure, with clearly defined eligibility criteria, for activities supporting preservation areas or OECMs in Indonesia. The IBioFund is mandated by the Ministry of Forestry to evolve as Indonesia's biodiversity financing vehicle. It is administered through the Environmental Fund Management Agency (BPDLH).

However, as IBioFund is relatively new (mid-2025) and remains in the early stages of developing its governance, fiduciary, and financing systems, the PRESERVE project will initially rely on the established financing architecture, fiduciary arrangements, and governance mechanisms of the Indonesia Environment Fund (IEF/BPDLH). The IEF is currently undergoing institutional strengthening through the Norwegian-funded UNDP INSIGHT project, which provides cash co-financing to this project and supports the upgrading of legal, regulatory, financial, information management, safeguards, and transparency systems. By the time the GBFF project begins implementation, the Indonesia Biodiversity Fund (IBioFund) is expected to have significantly strengthened its financing architecture, governance mechanisms, staff capacity, and MIS systems through ongoing institutional investments. These improvements covering fiduciary systems, safeguards, information management, and operational procedures will ensure that IBioFund is fully prepared to host and manage the proposed AP/OECM financing window.

The PRESERVE project is therefore designed to come online at the moment when IBioFund becomes operationally ready, enabling the seamless embedding of the AP financing window within a functional national blended-finance platform and ensuring that mobilized GBFF resources flow effectively through Indonesia's established biodiversity-finance architecture.

2#.

The project under Output 1.3 will develop a **National Areal Preservasi (AP) / Other Effective Area-Based Conservation Measures (OECM) Financing Roadmap** for the Ministry of Forestry. This roadmap will outline a coherent national approach for mobilizing and coordinating sustainable financing to support AP/OECM management. As part of this effort, the project will design a **blended finance platform** that integrates complementary public and private financing instruments. The platform will support long-term conservation outcomes by catalyzing investment, reducing financial risks, and improving access to diversified funding sources for AP/OECM initiatives

GBFF resources will not capitalize the financing window itself. Instead, they will provide technical assistance (TA) to design and establish the operational, institutional, and financial frameworks required for the blended finance instruments proposed under the AP/OECM platform.

This TA will support the development of mechanisms such as:

- Grant-supported concessional loans,
- Guarantee instruments, and
- Crop-wildlife insurance products

These instruments will be structured to finance **community-based conservation and sustainable-use models**, helping reduce risk, attract additional public and private capital, and enable long-term financing for AP/OECM initiatives. Therefore, capitalizing the AP/OECM

window remains a primary outcome of the PRESERVE project, however this will be achieved through sources other than GBFF.

These blended instruments will then be piloted in target landscapes, to benefit community-managed, IPLC-led initiatives by leveraging public and private financing, with GBFF grant funds used selectively as the "public" portion to underwrite risks, ensure safeguards, and demonstrate the viability of innovative, community-centered, biodiversity-positive investment models under the AP/OECM mechanism

One proposed instrument is to increase access to concessional loans such as *KUR Kehutanan Sosial* or social forestry credit lines, serve as a low-hanging fruit solution for smallholder farmers and community groups managing social forestry areas and transitioning to sustainable production and nature-positive practices. GBFF funding could support the development of a de-risking instrument to expand the eligibility of smallholder farmers and customary community groups to access the credit lines through banks.

The AP/OECM funding windows can support the greater uptake of KUR products and scaling of conservation-based social forestry, by channeling blended finance into technical assistance for loan appraisal and monitoring. New funding streams such as payments for ecosystem services can be mobilized to reinforce community-based and IPLC-led management of forests in preservation areas. Together, these mechanisms create a layered financing structure that bridges short-term farmer incentives with long-term ecosystem stewardship.

3#.

We note this advice and the provisions of the NGI policy. As stipulated above, the GBFF Funds will only be used as technical assistance to create and operationalize the AP/OECM funding window and in Component 2, to deploy grants that will constitute the "public" portion of blended finance instruments to underwrite risks, ensure safeguards, and demonstrate the viability of innovative, community-centered, biodiversity-positive investment models under the AP/OECM mechanism.

4#.

If selected in this GBFF round, the project will provide full clarity at CEO Endorsement on the specific blended-finance instruments to be developed through technical assistance, the financial institutions responsible for deploying them, and the sources of capital to be blended. Some of the early consultations, the BIOFIN project in Indonesia point to several possible, low-hanging financial solutions such as performance-based, IPLC based conservation agreements, NbS for HWC risk mitigation, agroforestry enterprises financing through revolving credit lines and value chain PPPs, eco-tourism and blue-carbon/peatland restoration revenue models, private conservation concessions backed by impact investment and risk guarantees.

Because IBioFund is still nascent, non-grant instruments such as concessional loans, guarantees, or insurance will be co-designed with the financial institutions, investors, or DFIs able to capitalize the AP/OECM financing platform. As advised, term sheets will be provided at CEO Endorsement for any reimbursable or performance-based grants, specifying triggers for reflows and how these will be managed within the project's financial architecture.

5#.

Thank you for this comment. In clarification, the amount of cofinance will remain at USD 3.4 million, as these represent identified commitments to IEF and IBioFund which will support the achievement of PRESERVE outputs. US\$ 25 million is the expected resource mobilization through the AP/OECM investment plan *during the project's lifetime*. At least US\$ 12 million

of this will be deployed to scale-up community-based conservation actions through blended finance instruments through the funding window in Component 2 during the project's lifetime. These figures are reported as results of the project, rather than as cofinance, as the source and type cannot definitely be identified at the point of PPG Request submission.

6#.

UNDP, with financial support from the Government of Norway, is implementing a two-year USD 2.14 million INSIGHT project to strengthen the Indonesia Environment Fund (IEF/BPDLH). This investment is designed to enhance IEF's institutional governance, operational structure, and capacity so that it can effectively manage environmental and climate finance. The project is carrying out a comprehensive institutional needs and gap assessment to improve governance frameworks, fiduciary oversight, and core business processes. It is also developing strengthened legal and regulatory frameworks, roadmaps, and capacity-building programs to support IEF's evolution into a fully capable national environmental financing mechanism aligned with international best practices.

The INSIGHT project will upgrade IEF's financial management systems, information systems, safeguards, and public transparency tools—including the development of a public-facing dashboard—to ensure accountable, data-driven decision-making. It is also enhancing IEF's institutional positioning through improved communication and coordination strategies that strengthen credibility and stakeholder engagement at national and international levels. Through these complementary investments, INSIGHT is establishing the robust institutional foundation required for IEF to manage existing and future financing windows, including biodiversity, renewable energy, and results-based financing linked to Indonesia's FOLU Net Sink 2030 commitments.

Both the GEF STAR MSP (GEFID 12125) and the GBFF PRESERVE will leverage this institutional strengthening effort as a shared baseline. While GEFID 12125 focuses on supporting the Ministry of Marine Affairs and Fisheries to develop a "Blue Financing Window" within IEF—investing in specific operational and financing strategies for marine conservation—this GBFF PPG will focus more specifically on blended-finance solutions to support AP/OECMs. Any strategic investments in institutional capacities of both projects (roadmaps, financing strategies, training, monitoring and governance/oversight mechanisms) will directly benefit the relevant technical area (marine conservation and OECM management). Because both projects will undergo PPGs concurrently, they will be able to coordinate closely, avoid overlap, and build coherence around the shared INSIGHT-supported institutional reforms. The early gap analysis produced by INSIGHT, together with ongoing system upgrades, will ensure that both projects benefit from a more capacitated, streamlined, and strategically positioned IEF capable of hosting new thematic financing platforms, including the AP/OECM window through IBioFund.

25 February 2026

Thank you for your kind guidance! We added the following Outcome and Output for the M&E Component of the project:

Outcome 4. Effective project performance through inclusive, participatory, and gender-responsive Monitoring and Evaluation (M&E) systems, enabling Adaptive Management

Output 4.1. Participatory, inclusive, and gender-responsive M&E system is implemented to measure the project effectiveness and risk levels, and support Adaptive Management

**Review Dates**

**First Review**

**Additional Review (as necessary)**

**Additional Review (as necessary)**

**Additional Review (as necessary)**

**Additional Review (as necessary)**

**PPG Request Review**

**2/19/2026**

**2/27/2026**

**3/16/2026**

**3/19/2026**

**Agency Response**

**2/25/2026**

**3/13/2026**

**3/19/2026**