Grantee: California

B-18-DP-06-0002 **Grant:**

April 1, 2021 thru June 30, 2021 Performance Report

Grant Number: Award Date: Obligation Date:

B-18-DP-06-0002

Review by HUD: Contract End Date: Grantee Name: Reviewed and Approved

Grant Status:

California

OPR Contact:

\$88,219,000.00

LOCCS Authorized Amount: Estimated PI/RL Funds:

\$88,219,000.00

Grant Award Amount:

Total Budget: \$88,219,000.00

Disasters:

Declaration Number

FFMA-4344-CA FEMA-4353-CA

Narratives

Mitigation Needs Assessment:

CDBG-MIT funds provide a unique opportunity for California communities impacted by the 2017 FEMA DR-4344 and DR-4353 disasters to fund and implement strategic mitigation activities, minimize disaster risks, and reduce future impacts. In the 2018 State Hazard Mitigation Plan (SHMP), the arrangement of hazard risk assessments was streamlined by the State Hazard Mitigation Team (SHMT) to effectively show grouping by hazard type. The 2018 hazard groupings present hazards of similar function together however, earthquakes, floods, and fires are still considered California's primary hazards Earthquake, flood, and fire hazards have historically caused the greatest human, property, and/or due to the following: • monetary losses, as well as economic, social, and environmental disruptions within the state. • Past major disaster events have led to the adoption of statewide plans for mitigation of these hazards, including the California Earthquake Loss Reduction Plan, State Flood Hazard Mitigation Plan, and California Fire Plan. • Together, these three hazards have the greatest potential to cause significant losses and disruptions, throughout the State of California.

As a result of the frequency, intensity, and variety of California's past natural disasters, earthquake, flood, and fire hazards have long been identified as the State of California's main hazards of concern, including the findings of the 2018 SHMP. For example, earthquake, while still

considered a primary hazard, is grouped with related geologic hazards including landslides and volcanoes. Flooding is still considered a primary hazard, but the new flood hazards also include sections on other types of flood hazards, including coastal flooding, tsunami, levee failure, and

dam safety. The third primary hazard, fire, includes both wildfire and structural fires. During the most recent SHMP update, the SHMT, made the decision with the California Office of Emergency Services (Cal OES) SHMP Coordinator to update the hazard organization structure using primary hazards, hazard grouping, and related secondary hazards.



No OPR Contact Found

The primary consideration in developing effective CDBG-MIT programming is the Mitigation Needs Assessment. Programs are developed to address identified hazards, risks, and vulnerabilities, create more resilient communities, and ensure full compliance with the requirements and objectives outlined in the Federal Register Notice. In addition to addressing identified mitigation needs, the CDBG-MIT funded programs also consider the connection to community lifelines, protecting vulnerable populations, alignment with the SHMP and local mitigation planning efforts, and how programs will provide funding for projects that meet the definition of mitigation activities. Furthermore, CDBG-MIT programs must adhere to eligible CDBG activities, be responsive to CDBG national objectives (including the new Urgent Need Mitigation category), comply with all regulatory guidance issued to HCD, and consider best practices established through similar resilience and preparedness initiatives. In addition, HUD has defined infrastructure projects with a total cost of \$100 million, of which at least \$50 million is CDBG, CDBG-DR, CDBG-NDR, or CDBG-MIT funds, as a Covered Project. HCD does not intend to fund projects that meet the definition of a Covered Project; however, should a mitigation project be expected to cost more than \$100 million, HCD will consult with HUD and ensure the proper procedures are followed. Grants under the Appropriations Act are only available for activities authorized under Title I of the Housing and Community Development Act of 1974 related to disaster relief, long term recovery, restoration of infrastructure and housing, and economic revitalization in the MID resulting from an eligible disaster. Further, CDBG-MIT funds may not be used for activities reimbursable by or for which funds are made available by FEMA, the US Army Corps of Engineers (USACE), or other federal funding sources. The allocations for each program are based on the Mitigation Needs Assessment, which identified wildfire, earthquakes, and flooding as the primary hazards. HCD opened the Action Plan and the associated program funding allocations for public comment in March 2020 and completed public comment on April 6, 2020. Appendix B provides a comprehensive list of comments received and HCD's responses. The total CDBG-MIT allocation for PL 1155-123 is \$88.2 million. HCD has allocated five percent of funding for administrative costs, twenty-five percent for the Resilience Planning and Public Services Program, and the remaining funding to the Resilient Infrastructure Program. At this time, HCD commits to directing 50 percent of the allocated CDBG-MIT funds to low and moderate income (LMI) individuals or areas in accordance with Section 103 of the Housing and Community Development Act. HCD also commits to directing 50 percent of the CDBG-MIT funds to benefit HUDidentified MID Areas.

Program	Mitigation Need(s)	Program Allocation	Percentage of Total
Resilient Infrastructure Program	Wildfires, Flood, Earthquakes	\$ 61,379,000	69.6%
Round 1	-	\$ 43,080,000	48.8%
Round 2	_	\$ 18,299,000	20.8%
Resilience Planning and Public Services	Wildfires, Flood, Earthquakes	\$ 22,440,000	25.4%
Planning/Capacity Building		\$13,200,000	14.9%
Public Services	uni.	\$9,240,000	10.5%
Administration		\$4,400,000	5.0%

Method of Distribution

HCD will distribute grant funding to beneficiaries using a subrecipient administered approach whereby subrecipients will engage with HCD to ensure that local mitigation needs are addressed. HCD will establish programs through which subrecipients will submit project proposals for funding. HCD will vet projects for CDBG-MIT compliance and eligibility, ensuring that proposed projects adhere to federal requirements and the requirements set forth in the Action Plan. The implementation and management of individual projects will be the responsibility of participating subrecipients, while HCD will provide monitoring and broad oersight of subrecipient administered funds.

2. Criteria to Determine Method of Distribution

HCD assessed its internal capacity as part of the capacity assessment required by the CDBG- MIT Federal Register Notice. The capacity assessment concluded that, with HCD's organizational and staffing adjustments, HCD has the capacity to administer CDBG-MIT funding. However, given the types of activities likely to result from the identified programs, HCD determined that local governments, nonprofit entities, and other community-based organizations (i.e. subrecipients) are in the best position to carry out activities directly. To that end, HCD also assessed the capacity of subrecipients and state partners to administer CDBG-MIT funded programs. While state partners are available for support in project evaluation,

HCD's assessment concluded that most subrecipients can operate and manage project-specific funding within the proposed framework of the CDBG-MIT programs. For those entities who require capacity building, HCD has proposed a track within the Resilience Planning and Public Services Program that would provide subrecipients with the ability to gain expertise, complete planning initiatives, or otherwise be better prepared to manage CDBG-MIT funding prior to submitting a Resilient Infrastructure Program application for grant funding. Additionally, HCD continues to promote regional, long-term planning and will encourage local jurisdictions to work and build capacity together in support of proposing regional-scale projects that could benefit the HUD-identified MID and surrounding areas.

3. Program Allocations

Allocations for the mitigation programs have been developed to address the current and future risks as identified in the Mitigation Needs Assessment of most impacted and distressed areas. The total unmet mitigation needs surpass the CDBG-MIT funds allocated to the state by HUD, HCD based programming decisions on reviews of the SHMP and local mitigation planning documents, consultations from federal, state, and local entities, best available data from multiple sources, including FEMA, CAL FIRE, Cal OES, and fire safe councils, broad engagement with the public and stakeholders, and exhaustive conversations about program typologies and design options to maximize the benefits of the available funding. Funds for planning and public services were determined based on needs articulated in state and local hazard mitigation planning documents, and through consultations and outreach efforts at the county ad city levels. The state will prioritize activities that benefit vulnerable populations and support subrecipient capacity building relative to community resilience and disaster preparedness. Subrecipients will be considered at the county and municipality levels, according to local hazard mitigation plans, determined needs, and relation to the MID. Similarly, infrastructure funding is allocated according to needs articulated in state and local hazard mitigation planning documents and through consultations and outreach efforts. The objective of the Resilient Infrastructure Program is to fund a broad range of infrastructure activities that address identified risks and vulnerabilities and create more resilient communities.

While HCD currently does not plan to fund housing programs with the CDBG-MIT allocation, HCD remains committed to addressing the needs of vulnerabe and underserved populations, including children, homeless persons, immigrants, persons with disabilities, persons from diverse cultures, persons with chronic medical disorders, persons with limited English proficiency or who are altogether non-English speaking, senior citizens, and transportation disadvantaged persons. HCD acknowledges that it will administer CDBG-MIT grant expenditures in conformity with the Fair Housing Act (42 USC 3601–3619) and implementing regulations, Title VI of the Civil Rights Act of 1964 (42 USC 2000d), and that it will affirmatively further fair housing as applicable to its projects.

- B. Mitigation Programs
- 1. Resilient Infrastructure Program
- a) Program Description

HCD proposes a program that will provide local jurisdictions with an expansive and hands-on role in driving local community infrastructure needs that meet the definition of mitigation activities. The Resilient Infrastructure Program allocates \$61,379,000 of CDBG-MIT funding to assist local

jurisdictions with mitigation-related infrastructure needs to support risk reduction from the three primary hazards (wildfire, flooding, and earthquake) as established within the Mitigation Needs Assessment. The program will promote a range of impactful projects, from fuel breaks in the forest to strategic risk reduction within the Wildland-Urban Interface (WUI) to roadway improvements within densely populated, vulnerable communities. Projects for infrastructure may address risks to a variety of systems and structures to enable continuous operations of critical business and government functions during future disasters and improve responses for human health and safety or economic security. HCD anticipates that the program design will present projects that could overlap across different environments, enabling HCD to determine maximum impact within the MID and surrounding areas.

Potential activities may include (but are not limited to):

- ρ΄ Emergency roadway improvements (ingress/egress and evacuation routes),
- b Fuel breaks and fuel reduction measures, some of which may be outlined in local jurisdictions I hazard mitigation plans,
- \(\phi \)
 Watershed management activities as outlined in local jurisdictions I hazard mitigation plans,
- Defensible space,
- Hardening of communication systems,
- p Flood control structures,
- p Flood drainage measures,
- Alternative energy generation,
- p Seismic retrofitting, and/or
- Critical facility hardening.

HCD will consult with the appropriate state agencies to provide subject matter

expertise in vetting and evaluating project proposals. These agencies will serve as state partners that support HCD in the development of assessment and selection criteria in evaluating project attributes, such as:

- b Effectiveness in mitigating risk to community lifelines,
- Benefits by calculating risk reduction value,
- P Risk reduction strategy is designed in a way that is cutting edge, sound, environmentally conscious, and potentially replicable, and
- Ability to leverage other funding sources and ensure state or local resources are considered in looking at a project's continued operation and maintenance. HCD intends to consult with thoe state agencies that have subject matter expertise in forest and watershed health programs and experience directly and indirectly completing relevant infrastructure projects to protect life and property. State partner involvement will also provide a level of support to HCD in helping local entities establish and target projects in which these funds can have the greatest impact. HCD will develop a competitive application by which eligible applicants (units of local government) can apply for funding to support projects that reduce risk to the MID. Policies and procedures will be established that outline the requirements of the program and rules for specific projects, including general eligibility and specific eligible and ineligible costs. The policies and procedures will establish the metrics and/or indicators that HCD will use in assessing proposed projects'leffectiveness in mitigating risk to community lifelines and risk reduction value. This program may build off, but not supplant, other state agencies'l existing programs that seek to reduce fire risk statewide. HCD will focus on implementation of projects in the MID that meet CDBG-MIT criteria. Local jurisdictions will have the opportunity to submit project applications for Resilient Infrastructure Program funding. Local governments will also be eligible to respond to NOFAs. The application will require local entities to provide evidence of sufficient capacity in implementing one or more resilient infrastructure projects. HCD will create two rounds of funding under the Resilient Infrastructure Program. Round One: The first round will make CDBG-MIT funding available to local projects that have completed designs, are already moving forward in initial design stages, or can exhibit some level of "shovel-readiness." In addition, the first round will serve jurisdictions that can demonstrate prior experience in implementing risk

reduction projects of scale and scope similar to what they are proposing. Local jurisdictions that are not able to present shovel ready projects and exhibit a minimum standard of capacity for Round One project funding will be afforded an opportunity to complete relevant planning initiatives and build capacity through the Resilience Planning and Public Services Program. Once eligible applicants are able to present fully developed project proposals and demonstrate a proper level of capacity, they would be eligible to apply for funding to implement their mitigation project. HCD anticipates the majority of Round One projects to be implemented, completed, and have met a NationalObjective within the first six years of the grant period. Round Two: Funds are being reserved for a second round of applications to serve eligible applicants that require additional time to present fully developed project proposals and demonstrate sufficient capacity. Due to method of distribution by rounds, this program will remain active over the course of the entire grant period to ensure eligible jurisdictions in the MID that require time for planning activities and need capacity building support can implement projects of similar risk

reductive impact in comparison to jurisdictions ready to implement projects during Round One. HCD will establish additional evaluation criteria under Round Two to ensure resilient infrastructure projects from applicants who received capacity building funding are given priority. The Resilient Infrastructure Program will assistn the development of priority projects within the local entities I hazard mitigation plans or similar planning documents that have either been on hold or shelved due to a lack of resources needed to fully fund the project. In establishing priorities and analyzing data under the Mitigation Needs Assessment, HCD identified projects under multiple programs (e.g. Hazard Mitigation Grant Program and California State Fire Safe Council programs) where a lack of available funding may be inhibiting risk reduction projects from completion. In this sense, the CDBG-MIT dollars used here will most likely play a pivotal role in being the final funding piece on critical projects to enable their implementation. While the leveraging of funds may be an evaluation criterion, it is not considered a minimum requirement for project approval. HCD will consider additional criteria, such as benefits to vulnerable populations, location in the MID or direct benefit to a MID, and mitigation outcomes, as primary factors in project selection.

- b) Eligible Activity(ies)
- p HCDA Section 105(a)(1) i Acquisition of Real Property
- p HCDA Section 105(a)(2) f Public Facilities and Improvements
- è HCDA Section 105(a)(4) É Clearance, Rehabilitation, Reconstruction, and Construction of Buildings (Including Housing)
- b HCDA Section 105(a)(9) i Payment of Non-Federal Share
- b HCDA Section 105(a)(11) i Relocation

The eligible activities above allow for eligible jurisdictions to submit applications for funding based on their individual mitigation needs and address the hazards identified in the Mitigation Needs Assessment. The activities will involve public improvements to forested land, watersheds, and other public land, potential demolition and clearance activities, and local cost share requirements on hazard mitigation projects. Additionally, HCD will incorporate additional waivers and alternative requirements provided in Federal Register Notice 84 FR 45838 regarding additional activity eligibility.

- c) National Objective
- Low- to Moderate-Income (LMI) and Urgent Need Mitigation (UNM) In accordance with 24 CFR 570.208, Section 104(b)(3) of the HCDA, and as further outlined within the waivers and alternative requirements at 84 FR 45838, all CDBG-MIT funded activities must satisfy either the LMI or UNM national objective. All Resilient Infrastructure Program activities will meet one national objective criterion related to its specific mitigation impact and defined direct benefits or service area. The prioritization criteria below for the Resilient Infrastructure Program will ensure that proposed projects, at a minimum, address how they will affect vulnerable and LMI populations, HCD's analysis of LMI Summary Data (LMISD) of the MID within the Mitigation Needs Assessment Indicates only one MID (the Lake County zip code) as being 51 percent or more LMI. In order to identify activities which may meet the LMI national objective, HCD will require local entities to look at LMISD on a block group level to determine project target areas and whether an LMI area benefit (LMA) exists. HCD will utilize resources identified within the Mitigation Needs Assessment to aid in project selection (e.g., FEMA HMGP projects currently not awarded67, CAL FIRE and Local Fire Safe Council program needs, Community Wildfire Prevention and Mitigation Report, established under the state state state order N-05-1968). These reports and data also consider the identification of vulnerable communities based on socioeconomic characteristics to establish priority projects.

Proposed Use of Funds:



<u>Overall</u>	This Report Period	To Date
Total Projected Budget from All Sources	\$0.00	\$5,900,000.00
Total Budget	\$0.00	\$5,900,000.00
Total Obligated	\$0.00	\$5,900,000.00
Total Funds Drawdown	\$113,668.75	\$200,360.00
Program Funds Drawdown	\$113,668.75	\$200,360.00
Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$158,346.25	\$279,693.75
HUD Identified Most Impacted and Distressed	\$0.00	\$0.00
Other Funds	\$ 0.00	\$ 0.00
Match Funds	\$ 0.00	\$ 0.00
Non-Match Funds	\$ 0.00	\$ 0.00
Funds Expended		
Overall	This Period	To Date
State of California	\$ 158,346.25	\$ 279,693.75

Progress Toward Required Numeric Targets

Requirement	Target	Projected	Actual
Overall Benefit Percentage	50.00%	.00%	.00%
Overall Benefit Amount	\$44,109,500.00	\$.00	\$.00
Limit on Public Services	\$13,232,850.00	\$500,000.00	\$119,280.00
Limit on Admin/Planning	\$17,643,800.00	\$4,400,000.00	\$.00
Limit on Admin	\$4,410,950.00	\$4,400,000.00	\$.00
Most Impacted and Distressed	\$44,109,500.00	\$2,200,000.00	\$.00

Overall Progress Narrative:

DR-Infrastructure and MIT-Resilient Infrastructure Program: Staff held Office Hours with Eligible Applicants concerning their Due Diligence submissions.

The Master Standard Agreements (MSA) are routing, DR and MIT staff shared a Project Application Template to enable applicants to begin gathering required



project information while the MSA was being routed. Once a MSA is executed a Project Application can be submitted. HCD staff also prepared a webinar on the Project Applications to be held in Q3.

Along with the Due Diligence Office Hours and reviews, DR/MIT staff also held Office Hours with the City of Santa Rosa to provide technical assistance and answer questions regarding their potential Fire Station and Flood wall projects.

Mitigation Public Service: Completed first round of funding recommendations for Internal Loan Committee (ILC) and preparing the second round of funding recommendations. Continuing applicant outreach to follow up on application details. Continuing review of follow up information provided by applicants regarding application details.

Project Summary

Project #, Project Title	This Report	To Date	
	Program Funds Drawdown	Project Funds Budgeted	Program Funds Drawdown
2017 MIT -RIP, 2017 Mitigation Infrastructure Resilience	\$43,986.25	\$61,379,000.00	\$81,080.00
2017 MIT Admin, 2017 Mitigation Administration	\$0.00	\$4,400,000.00	\$0.00
2017 MIT Planning, 2017 Mitigation Planning	\$69,682.50	\$13,200,000.00	\$119,280.00
2017 MIT PS, Mitigation Public Services	\$0.00	\$9,240,000.00	\$0.00
9999. Restricted Balance	\$0.00	\$0.00	\$0.00

Activities

Project #/

2017 MIT -RIP / 2017 Mitigation Infrastructure Resilience



Grantee Activity Number: 2017 MIT Infrastructure Resilience Activity Title: 2017 MIT Infrastructure Resilience

Activitiy Type:

MIT - Public Facilities and Improvements-Non Covered

Project Number:

2017 MIT -RIP

Projected Start Date:

08/12/2020

Benefit Type:

N/A

National Objective:

Urgent Need Mitigation

Activity Status:

Under Way

Project Title:

2017 Mitigation Infrastructure Resilience Projects

Projected End Date:

08/11/2032

Completed Activity Actual End Date:

Responsible Organization:

State of California

Overall	Apr 1 thru Jun 30, 2021	To Date
Total Projected Budget from All Sources	\$0.00	\$500,000.00
Total Budget	\$0.00	\$500,000.00
Total Obligated	\$0.00	\$500,000.00
Total Funds Drawdown	\$43,986.25	\$81,080.00
Program Funds Drawdown	\$43,986.25	\$81,080.00
Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$61,768.75	\$111,785.00
State of California	\$61,768.75	\$111,785.00
Most Impacted and Distressed Expended	\$0.00	\$0.00
Other Funds	\$ 0.00	\$ 0.00
Match Funds	\$ 0.00	\$ 0.00
Non-Match Funds	\$ 0.00	\$ 0.00

Other Funds:

Overall	This Period	
Match Funds	\$ 0.00	\$ 0.00

Activity Description:

CDBG-DR funds will be used for eligible Infrastructure Resilience projects. Additional Activities will be established once the projects are identified and funded.

Location Description:

Sonoma and Ventura counties; 93108, 94558, 95422, 95470, and 95901 Zip Codes.

Activity Progress Narrative:

In April and May, the DR-Infrastructure and MIT-Resilient Infrastructure Program staff held Office Hours with Eligible Applicants concerning their Due Diligence submissions. At the Office Hour sessions, staff discussed any policies and procedures that had not been submitted in the Due Diligence as well as if the submitted documents met standards or would become special conditions for the Master Standard Agreements (MSA).

Upon final review of the submitted documentation and eligible applicants providing HCD with Authorized Resolutions, HCD began routing the Master Standard Agreements for approval and transmittal. While the MSAs are routing, DR and MIT staff shared a Project Application Template to enable applicants to begin gathering



required project information while the MSA was being routed. Staff prepared the Grants Network space (i.e. the DR/MIT Grant Management System) for the Project Applications. Once a MSA is executed a Project Application can be submitted. HCD staff also prepared a webinar on the Project Applications to be held in Q3.

Along with the Due Diligence Office Hours and reviews, DR/MIT staff also held Office Hours with the City of Santa Rosa to provide technical assistance and answer questions regarding their potential Fire Station and Flood wall projects.

Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Amount

No Other Funding Sources Found Total Other Funding Sources

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Activity Supporting Documents: None

Project # / 2017 MIT Planning / 2017 Mitigation Planning



Grantee Activity Number: 2017 MIT Public Services Activity Title: 2017 MIT Public Services

Activitiy Type:

MIT - Public Services and Information

Project Number:

2017 MIT Planning

Projected Start Date:

08/13/2020

Benefit Type:

N/A

National Objective:

Urgent Need Mitigation

Activity Status:

Under Way

Project Title:

2017 Mitigation Planning

Projected End Date:

08/12/2032

Completed Activity Actual End Date:

Responsible Organization:

State of California

Overall	Apr 1 thru Jun 30, 2021	To Date
Total Projected Budget from All Sources	\$0.00	\$500,000.00
Total Budget	\$0.00	\$500,000.00
Total Obligated	\$0.00	\$500,000.00
Total Funds Drawdown	\$69,682.50	\$119,280.00
Program Funds Drawdown	\$69,682.50	\$119,280.00
Program Income Drawdown	\$0.00	\$0.00
Program Income Received	\$0.00	\$0.00
Total Funds Expended	\$96,577.50	\$167,908.75
State of California	\$96,577.50	\$167,908.75
Most Impacted and Distressed Expended	\$0.00	\$0.00
Other Funds	\$ 0.00	\$ 0.00
Match Funds	\$ 0.00	\$ 0.00
Non-Match Funds	\$ 0.00	\$ 0.00

Other Funds:

OverallThis PeriodTo DateMatch Funds\$ 0.00\$ 0.00

Activity Description:

CDBG-DR funds will used for eligible planning activities. Additional Activities will be established once the projects are identified and funded.

Location Description:

Sonoma and Ventura counties; 93108,94558,95422,95470, and 95901 Zip Codes.

Activity Progress Narrative:

Completed first round of funding recommendations for ILC and preparing the second round of funding recommendations. Started due diligence process for recommended applicants. Submitted Authorizing Resolution template to LAD for review, approval expected by 7/8/2021. Sent draft of policy brief on funding



recommendation and potential second round of MIT-PPS to Leadership. Continuing applicant outreach and follow up on application details. Continuing the review of follow up information that is provided by applicants regarding application details.

Accomplishments Performance Measures

No Accomplishments Performance Measures

Beneficiaries Performance Measures

No Beneficiaries Performance Measures found.

Activity Locations

No Activity Locations found.

Other Funding Sources Amount

No Other Funding Sources Found Total Other Funding Sources

Other Funding Sources Budgeted - Detail

No Other Match Funding Sources Found

Activity Supporting Documents: None

Monitoring, Audit, and Technical Assistance

Event Type	This Report Period	To Date
Monitoring, Audits, and Technical Assistance	1	1
Monitoring Visits	0	0
Audit Visits	0	0
Technical Assistance Visits	1	1
Monitoring/Technical Assistance Visits	0	0
Report/Letter Issued	0	0

