

# **State of Kansas**

## **AMENDED CITIZEN PARTICIPATION PLAN**

RELATING TO THE ADMINISTRATION OF  
THE COMMUNITY PLANNING & DEVELOPMENT PROGRAMS  
OF THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

Adopted on May 7, 2020

STATE OF KANSAS  
AMENDED CITIZEN PARTICIPATION PLAN  
RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING &  
DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT (HUD)

Table of Contents

<b>A.</b>	<b>Introduction</b>	<b>4</b>
	Purpose	
	Lead Agency	
	Effective Date	
<b>B.</b>	<b>Encouragement of Citizen Participation</b>	<b>5</b>
	General	
	Persons with Disabilities	
	Organizations and Agencies	
	Public Notices	
	Public Hearings	
	Technical Assistance	
	Requirements for Local Governments	
	Online Access	
	Other Engagement Techniques	
	State Contact Person	
<b>C.</b>	<b>The Citizen Participation Plan</b>	<b>6</b>
	Amendments to the Approved Citizen Participation Plan	
	Amendment Considerations	
	Draft Amended Plan Review	
	Comments Received on Draft Amended Plan	
	Public Hearing	
	Action for Approval	
	Submission to HUD	
	Plan Access	
<b>D.</b>	<b>The Consolidated Plan</b>	<b>7</b>
	Plan Development	
	Stakeholder Consultation and Citizen Outreach	
	Public Hearings	
	Potential Displacement of Persons	
	Public Display and Comment Period	
	Comments Received on the Draft Consolidated Plan	
	Action for Approval	
	Submission to HUD	
	Revisions to the Consolidated Plan	
	Revision Considerations	
	Public Display and Comment Period	
	Comments Received on the Draft Revised Consolidated Plan	
	Action for Approval	
	Submission to HUD	

In the Event of a Disaster  
Plan Access

<b>E.</b>	<b>The Annual Action Plan</b>	<b>11</b>
	Plan Development	
	Public Hearings	
	Public Display and Comment Period	
	Comments Received on the Draft Annual Action Plan	
	Action for Approval	
	Submission to HUD	
	Revisions to the Annual Action Plan	
	Revision Considerations	
	Public Display and Comment Period	
	Comments Received on the Draft Revised Annual Action Plan	
	Action for Approval	
	Submission to HUD	
	In the Event of a Disaster	
	Plan Access	
<b>F.</b>	<b>Consolidated Annual Performance and Evaluation Report (CAPER)</b>	<b>14</b>
	Report Development	
	Report Considerations	
	Public Display and Comment Period	
	Comments Received on the Draft CAPER	
	Submission to HUD	
<b>G.</b>	<b>Complaints</b>	<b>14</b>

STATE OF KANSAS  
AMENDED CITIZEN PARTICIPATION PLAN  
RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING &  
DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT (HUD)

## **A. Introduction**

### Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.110, the State of Kansas (referred to as the “State”) sets forth the following amended Citizen Participation Plan (the “Plan”) as it relates to the administration of the Community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). The Plan presents the State’s plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of:

- 1) The Citizen Participation Plan
- 2) The Consolidated Plan (CP)
- 3) The Annual Action Plan (AAP), and
- 4) The Consolidated Annual Performance and Evaluation Report (CAPER)

### Lead Agency

The Kansas Housing Resources Corp. (KHRC) is the lead agency responsible for the development of the documents covered by this Plan.

### Effective Date

Subsequent to approval of this amended Citizen Participation Plan by KHRC and HUD, the Plan shall be effective until it is amended or otherwise replaced.

## **B. Encouragement of Citizen Participation**

### General

The State provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Consolidated Plan, the Annual Action Plan, and the CAPER. The State encourages participation by low- and moderate-income persons, particularly those living in areas designated as revitalization areas or in slum and blighted areas and in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. With respect to the public participation initiatives included in this Plan, the State will take appropriate actions to encourage the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities, as described below.

### Persons with Disabilities

To encourage the participation of persons with disabilities, the State will continue to include the following language in all public meeting notices published in the *Kansas Register*:

*Individuals with disabilities or limited English proficiency are welcome to attend and participate in the public hearing. If you are in need of a sign language interpreter, an assistive listening device, large print, or Braille material, or other accommodation to attend this meeting, please notify KHRC at least one week prior to the meeting. Requests may be addressed to KHRC, 611 S. Kansas Ave., Suite 300, Topeka, Kansas, 66603-3803 or by phone, 785-217-2023 or via the Kansas relay service.*

KHRC will conduct all public meetings in locations that are handicapped-accessible, when available.

### Organizations and Agencies

The State encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved through stakeholder interviews, focus groups and/or public meetings.

### Public Notices

The State will publish notices for public hearings in the *Kansas Register*. The notices will be published at least ten (10) days before, but no more than thirty (30) days before, the beginning dates of the public hearings. The notices will include the purpose, times, and places of the public hearings. The notice for citizen review and testimony on the preliminary draft of documents covered by this Plan will be posted on the website of the Kansas Housing Resources Corporation, [www.kshousingcorp.org](http://www.kshousingcorp.org), where the plan may be examined.

### Public Hearings

The State will conduct one or more public hearings for citizen input on the documents covered by this Plan. Public hearings will be held at times and places convenient to the beneficiaries of the State's programs. The State will ensure accessible accommodations for persons with disabilities. The State will offer bilingual communications for non-English speaking residents when they will be affected by the State's programs.

### Technical Assistance

State staff with the HUD programs covered by this Plan are available to assist organizations that are interested in submitting a proposal to obtain funding through the CDBG/HOME/ESG/HOPWA programs. All potential applicants are strongly encouraged to contact Kansas Housing Resources Corporation for technical assistance before initiating a funding request application.

### Requirements for Local Governments

Local government applications must meet minimum citizen participation requirements for mandated programs (CDBG, HOME, ESG, and HOPWA). Prior to submission of each respective application to the State, a local government applicant must hold one legal public hearing regarding the application. The purpose of the hearing is to present the proposed project to local citizens for discussion. The public hearing must be conducted by the applicant's governing body.

If the State's application process involves a preliminary application and a final application, a local government applicant must hold one legal public hearing before submission of the preliminary application and one legal public hearing before submission of the final application.

Local government applicants must provide timely, understandable notices for public hearings. Notices must be published in local newspapers of general circulation. Notices must be published at least five days before, but not more than twenty days before, the dates of public hearings. Notices for public hearings must identify each proposed project; project location, including target area boundaries, if any; proposed project activity; total project cost; and grant amount requested.

Public hearings must be held at times and places convenient for affected citizens, including persons with disabilities. Public hearings must contain bilingual communications for non-English speaking residents when they will be affected by a proposed project.

#### Online Access

The State will post draft copies and final copies of all documents covered by this Plan on the website of KHRC and accessible at [www.kshousingcorp.org](http://www.kshousingcorp.org). State records will remain available for the preceding five years.

#### Other Engagement Techniques

The Plan may be amended as the State continues to gain access to technology that improves the avenues of participation by its residents.

#### Contact Person

All communication regarding the Plan, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to: Consolidated Plan Coordinator at [info@kshousingcorp.org](mailto:info@kshousingcorp.org).

## **C. The Citizen Participation Plan**

### Amendments to the Approved Citizen Participation Plan

The State shall follow the following procedure to amend its approved Citizen Participation Plan, as needed.

#### a. Amendment Considerations

The State will amend the Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the Plan be found by the State to conflict with HUD regulations, or when changes in HUD regulations occur, or based on current HUD guidance. Edits to the Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

b. Draft Amended Plan Review

The draft Amended Plan will be made available for public review for a 15-day period prior to adoption and may be done concurrently with the public review and comment process for the Consolidated Plan. Copies of the draft Amended Plan will be made available for review on the KHRC website accessible at [www.kshousingcorp.org](http://www.kshousingcorp.org)

c. Comments Received on Draft Amended Plan

Written comments will be accepted by the Contact Person, or a designee, during the 15-day public review period.

d. Public Hearing

The State will conduct a public hearing to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

e. Action for Approval

Following the public hearing, the Plan will be presented to Kansas Housing Resources Corporation for consideration and formal action.

f. Submission to HUD

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the State's responses and proof of compliance with the minimum 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Plan Access

The approved Amended Citizen Participation Plan will be kept on file at KHRC. The plan can be accessed online at [www.kshousingcorp.org](http://www.kshousingcorp.org)

Hard copies can be made available to those requesting the approved Amended Plan by contacting the Contact Person, or a designee.

## **D. The Consolidated Plan (CP)**

## Plan Development

The State will follow the process and procedures described below in the development of its Consolidated Plan (CP).

### a. Stakeholder Consultation and Citizen Outreach

When preparing the CP, the State shall consult with public and private agencies that provide assisted housing, health services, social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons), and State-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws during preparation of the consolidated plan.

When preparing the portions of the CP describing the State's homeless strategy and the resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of homelessness, the State will consult with Continuums of Care within the state; public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families, of homeless individuals and families, including homeless veterans, youth, and/or of other persons with special needs; publicly funded institutions and systems of care that may discharge persons into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, business and civic leaders.

The State will also consult with each Continuum of Care in determining how to allocate its ESG grant for eligible activities; developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and developing funding, policies, and procedures for the operation and administration of the HMIS.

When preparing the portion of the CP concerning lead-based paint hazards, the State will consult with state or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing its method of distribution of assistance under the CDBG program, the State will consult with local governments in non-entitlement areas of the State.

A variety of mechanisms may be utilized to solicit input from these persons/service providers/agencies/entities. These include written letters, conference calls or in-person interviews, mail or internet surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

### b. Public Hearings

The State will conduct at least two public hearings in the development of the CP. The first public hearing will be conducted before the draft CP is published for public comment, during



which the State will address housing and community development needs, development of proposed activities, the amount of assistance the State expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the State will address identified housing and community development needs and proposed eligible activities.

c. Potential Displacement of Persons

Although the State does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. When displacement is unavoidable on a temporary or permanent basis, the State will comply with the federal Uniform Relocation Act. Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the State shall compensate residents who are actually displaced in accordance with *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*.

This resource is accessible online at:

[https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/affordablehousing/training/web/relocation/displaced](https://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/training/web/relocation/displaced)

d. Public Display and Comment Period

The draft CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP; the anticipated amounts of funding (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG activities, if any; plans to assist persons actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft CP can be examined; how comments will be accepted; when the document will be considered for action for approval; and, the anticipated submission date to HUD. Copies of the draft CP will be made available for review at [www.kshousingcorp.org](http://www.kshousingcorp.org)

e. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the Contact Person, or a designee, during the 30-day public display and comment period. The State will consider any comments or views of State residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to HUD.

f. Action for Approval

Following the public hearing, the CP will be considered for approval by Kansas Housing Resources Corporation.

g. Submission to HUD

The CP will be submitted to HUD no less than 45 days before the start of the State's five-year program cycle.

### Revisions to the Consolidated Plan

The State shall follow the following procedure to revise its CP, as needed.

#### a. Revision Considerations

There are two types of amendments that may occur with the CP: minor amendments and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

- When an eligible activity is added
- When an unapproved activity is changed to an approved activity, or vice versa
- When there is a change from competitive award of funds to a formula allocation of funds, or
- When there is a change in the priorities identified in the CP

All other changes that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the Consolidated Plan Coordinator and will not be subject to public comments. These changes will be fully documented and signed by the Consolidated Plan Coordinator.

The State may choose to submit a copy of each amendment to the CP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Consolidated Plan Coordinator.

#### b. Public Display and Comment Period

The draft Revised CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised CP can be examined, how comments will be accepted, when the document will be considered for action by State Council, and the anticipated submission date to HUD. Copies of the draft Revised CP will be made available for review at [www.kshousingcorp.org](http://www.kshousingcorp.org)

#### c. Comments Received on the Draft Revised Consolidated Plan

Written comments will be accepted by the Contact Person, or a designee, during the 30-day public display and comment period. The State will consider any comments or views of State residents received in writing, or orally at public hearings, in preparing the final Revised CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised CP for submission to HUD.

#### d. Action

Following the public hearing, the Revised CP will be considered for approval by Kansas Housing Resources Corporation.

e. Submission to HUD

The Revised CP will be submitted to HUD within 15 days of approval by the State.

In the Event of a Disaster

In the event of a State or federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the State's disaster response, the State's requirements under this Plan will be streamlined to include:

- a. A 5-day public display and comment period to amend the CP.
- b. A minimum of one public hearing shall be held to receive comments on the Revised CP.
- c. A virtual public hearing may substitute if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.
- d. Following the public hearing, the Revised CP will be presented for consideration and approval.
- e. The Revised CP will be submitted to HUD within 15 days of approval by the State.

Plan Access

The Revised CP will be kept on file at the KHRC and accessible online at [www.kshousingcorp.org](http://www.kshousingcorp.org)

Hard copies can be made available to those requesting the approved Amended CP by contacting the Contact Person, or a designee.

## **E. The Annual Action Plan (AAP)**

The Annual Action Plan (AAP) is a component of the Consolidated Plan, and it describes the State's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP for each program year; the State's method for distributing funds to local non-profit organizations; and, the geographic areas of the State to which it will direct assistance.

Plan Development

The State will follow the process and procedures described below in the development of its AAP.

a. Public Hearings

The State will conduct at least two public hearings during the development of the AAP. The first public hearing will be conducted before the AAP draft is published for public comment, during which the State will address housing and community development needs, development of proposed activities, the amount of assistance the State expects to receive

(including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during the 30-day public comment period during which the State will address identified housing and community development needs and proposed eligible activities.

Both public hearings conducted for the Year 1 AAP may be conducted concurrently with the required public hearings for the five-year Consolidated Plan.

b. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for approval, and the anticipated submission date to HUD. Copies of the draft AAP will be made available for review at [www.kshousingcorp.org](http://www.kshousingcorp.org)

c. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the Contact Person, or a designee, during the 30-day public display and comment period. The State will consider any comments or views of State residents received in writing, or orally at the public hearings, in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AAP for submission to HUD.

d. Action for Approval

Following the public hearing, the Revised CP will be considered for approval by Kansas Housing Resources Corporation.

e. Submission to HUD

The AAP will be submitted to HUD no less than 45 days before the start of the State's annual program year.

Revisions to the Annual Action Plan

The State shall follow the following procedure to revise its AAP, as needed.

a. Revision Considerations

There are two types of amendment that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

- When an eligible activity is added or deleted
- When a change occurs in the purpose, location, or beneficiaries of an activity previously approved

- When an unapproved activity is changed to an approved activity, or vice versa
- When a 50 percent change in federal funding occurs where the project is \$100,000 or less
- When a 25 percent change in federal funding occurs where the project is more than \$100,000.

All other changes to funding allocations or approved eligible activities that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the Kansas Housing Resources Corporation and will not be subject to public comments. These changes will be fully documented and signed by the Kansas Housing Resources Corporation.

The State may choose to submit a copy of each amendment to the AAP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Consolidated Plan Coordinator.

b. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action for approval, and the anticipated submission date to HUD. Copies of the draft Revised AAP will be made available for review at [www.kshousingcorp.org](http://www.kshousingcorp.org)

c. Comments Received on the Draft Revised Annual Action Plan

Written comments will be accepted by the Contact Person, or a designee, during the 30-day public display and comment period. The State will consider any comments or views of State residents received in writing, or orally at public hearings, in preparing the final Revised AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AAP for submission to HUD.

d. Action for Approval

Following the public hearing, the Revised AAP will be considered for approval by Kansas Housing Resources Corporation.

e. Submission to HUD

The Revised AAP will be submitted to HUD within 15 days of approval by the State.

In the Event of a Disaster

In the event of a State or federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the State's disaster response, the State's requirements under this Plan will be streamlined to include:

- a. A 5-day public display and comment period to amend the CP.
- b. A minimum of one public hearing shall be held to receive comments on the Revised CP.
- c. A virtual public hearing may substitute if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.
- d. Following the public hearing, the Revised CP will be presented for consideration and approval.
- e. The Revised CP will be submitted to HUD within 15 days of approval by the State.

#### Plan Access

The Revised AAP will be kept on file at the Kansas Housing Resources Corporation, 611 S. Kansas Avenue, Suite 300, Topeka, KS 66603. The plan can be accessed online at [www.kshousingcorp.org](http://www.kshousingcorp.org)

Hard copies can be made available to those requesting the approved Amended Plan by contacting the Contact Person, or a designee.

## **F. Consolidated Annual Performance and Evaluation Report (CAPER)**

#### Report Development

The State shall follow the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

- a. Report Considerations

The Department of Commerce, Kansas Housing Resources Corporation, and the Department of Health and Environment will evaluate and report the accomplishments and expenditures of the previous program year for CDBG, HOME, ESG, HOPWA and HTF funds and draft the CAPER in accordance with HUD requirements.

- b. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the online address the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at [www.kshousingcorp.org](http://www.kshousingcorp.org)

- c. Comments Received on the Draft CAPER

Written comments will be accepted by the Contact Person, or a designee, during the 15-day public display and comment period. The State will consider any comments or views of State residents received in writing in preparing the final CAPER. A summary of these comments or

views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CAPER for submission to HUD.

d. Submission to HUD

The CAPER will be submitted to HUD within 90 days following the end of the State's annual program year.

## **G. Complaints**

Residents may register complaints regarding any aspect of the CDBG, HOME, ESG, HOPWA or HTF programs by contacting the Contact Person, or a designee. All written complaints received will be addressed in writing within 15 days.

Residents wishing to object to HUD approval of the final CP may send written objections to the HUD Field Office at US Department of HUD, 400 State Avenue, Room 200, Kansas City, KS 66101-2406. Objections should be made within 30 days after the State has submitted any of the documents covered by this Plan to HUD. Any objections made will only be submitted to HUD for the following reasons:

- The applicant's description of needs and objectives is plainly inconsistent with available facts and data
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant
- The application does not comply with the requirements of the CDBG, HOME, ESG, HOPWA or HTF programs or other applicable laws
- The application proposed activities which are otherwise ineligible under the program regulations.

Objections shall include an identification of requirements not met and available facts and data.