



FLORIDA INSTITUTIONAL LEGAL SERVICES

A PROJECT OF

FLORIDA LEGAL SERVICES, INC.

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June 12, 2014

Steve Auger, Executive Director
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Proposed Rule Development: Rule Chapters 67-21, 67-32, 67-48, and 67-60, F.A.C.

Dear Mr. Auger:

Please accept this comment on behalf of Florida Legal Services, Inc. (FLS), a non-profit, public interest law firm that provides civil legal assistance to indigent persons across Florida. One of FLS' projects is the Affordable Housing Advocacy Program. The goal of the program is advocacy to promote the preservation of existing affordable housing units and to support the development of new affordable housing units. Obviously, the funding provided through FHFC is critical to achieving that goal and is of great interest to FLS and other affordable housing advocates throughout Florida.

We commend FHFC for utilizing public workshops and public comment on draft RFAs before they become final. However, because affordable housing developments are so critical to every community in Florida, we believe that allowing public participation and comment of proposed RFAs is not only advisable but necessary. We encourage FHFC to adopt a public input requirement in its strategic plan and in its rules governing adoption of RFAs. In light of FHFC's current trend of including in RFAs many issues that had previously been part of an adopted rule, we recommend that an opportunity for public comment before an RFA is finalized be instituted as a regular process for the FHFC.

Thank you for the opportunity to comment concerning proposed rules.

Sincerely,

Peter P. Sleasman