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**Subject:** Current Draft of CFB Rules  
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Good afternoon, our firm represents Housing First Minnesota, a homebuilder trade association representing thousands of Minnesota builders, developers and suppliers. I am submitting comments regarding the proposed expansion of the lobbyist registration and reporting requirements as reflected in proposed Minn. Rules Ch. 4511. Member company representatives routinely engage local governments both formally and informally to advocate for their proposed housing projects; while we appreciate the desire of the drafters to provide more transparency to that process, it is important to note that every application to plan and develop a new housing development is statutorily required to undergo a significant public process, replete with signed applications and public hearings at which the identity of the applicant companies and their hired representatives must be disclosed. The proposed rules add one more regulatory burden to an already extensive public process which, in our opinion, provides minimal or no new insight into the identity of project applicants or their hired representatives.

Having said that, we appreciate the positive changes made to the draft rules and urge your consideration of two additional changes:

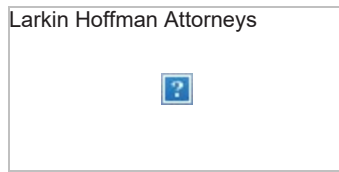
1. We recommend that 4511.1000, subpart 1 be amended to limit registration to advocating for an amendment to the local jurisdiction's comprehensive plan. The rationale is that no housing project can advance if the local comprehensive plan doesn't authorize it in the first instance. Any request for a zoning amendment or subdivision is statutorily predicated on being in compliance with an approved comprehensive plan. The comprehensive plan process will adequately identify the project applicants if that is deemed important. As noted above, the follow-on process is already very transparent.
2. We also recommend that 4511.1000, subpart 1 be further amended to not require registration for any public proceeding in which a landowner or their hired representative is statutorily required to participate in order to preserve a legal objection, such as when a city advances a special assessment proceeding under Minn. Stat. 429.169 and proposes to assess project costs to affected landowners over their objection; failure to confirm an objection to a proposed assessment at the scheduled assessment hearing constitutes waiver of the objection and precludes any future challenge to it. It seems to us fundamentally unfair and burdensome to both compel participation in a statutory process in order to preserve a legal right and convert it into "lobbying" requiring registration and reporting.

Thank you for considering these comments.

**Peter J. Coyle**  
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