



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

Mailstop 3010

February 22, 2016

Via E-mail

Mr. Jeffrey K. Waldvogel  
Chief Financial Officer  
KBS Legacy Partners Apartment REIT, Inc.  
800 Newport Center Drive, Suite 700  
Newport Beach, CA 92660

**Re: KBS Legacy Partners Apartment REIT, Inc.  
Form 10-K for the year ended December 31, 2014  
Filed March 9, 2015  
File No. 000-54673**

Dear Mr. Waldvogel:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Robert F. Telewicz, Jr.

Robert F. Telewicz, Jr.  
Accounting Branch Chief  
Office of Real Estate and  
Commodities