

Tara Hall

From: Jim Harrell <jim@harrellpllc.com>
Sent: Friday, September 30, 2022 1:46 PM
To: RentalHelp
Subject: Proposed QAP Comments
Attachments: QAP Comment.pdf

To Whom It May Concern:

I have great concern with using the website "walkscore.com" as a determining factor in NC's LIHTC competition.

Conflicting business interests:

As I understand, Walkscore.com is owned by Redfin (https://en.wikipedia.org/wiki/Walk_Score) (<https://en.wikipedia.org/wiki/Redfin>) who has a business interest in steering customers to areas where they broker real estate, to areas where they have subscribers to their company owned apartmentguide.com, etc. These conflicts beg many questions. For instance, in hopes of improving your property's walkscore, does it help if you subscribe/advertise through apartmentguide.com? <https://www.apartmentguide.com/list-a-property-for-rent/> Please know that I do not have access to how their algorithms are developed but I do know that their private ownership and conflicting interests should create great concern with the fairness of basing awards on their site's conclusions.

Affiliated companies under scrutiny:

As you will read, Redfin is under scrutiny for steering development away from African American communities: <https://www.fairhousingjustice.org/redfin-redlines-on-long-island/>

The following is a link to the complaint filed in Federal court: <https://www.fairhousingjustice.org/wp-content/uploads/2020/10/Redfin-Filed-Complaint-00437904x9CCC2.pdf> It appears to me that "Walkscore.com" is vulnerable to some of the same redlining arguments.

Additionally, in my search for properties, it seems like some rural areas needing housing are entirely eliminated.

The Site Is Flawed

Some scores are based on incorrect information - As I work with the site, I have found that they regularly base the score on inaccurate information. For instance, I entered the address of an existing development into walkscore.com for Elkin and many stores including a 10 plus year old WalMart are not on the site. I entered an address near New Bern and the website does not recognize an existing WalMart on a neighboring tract of land. Maybe they have competing business interests with WalMart?

I disagree with the advice generated by algorithms

Using algorithms, the site advises that a resident of Elkin would have a commute to Statesville of 60 miles. There are several employers that I have met with recently in Elkin that are needing employees at relatively high wages. Elkin has a great public school system, it is an area with a low cost of living in comparison to most and the site that I entered is within a short walk to many amenities. I guess that the developers of the algorithms are not aware that there are cost of living increases in metros that need to be taken into consideration.

Alternative to walkscore.com

As for an alternative, I recommend a panel selected by the Agency to review and score each set-aside. The panelists selected could remain anonymous and would be selected from areas outside of the set-aside that they are considering. They would be required to recuse themselves if they have a conflict. As for the basis of their score, I would recommend that the panel not be allowed to consider local support or opposition or the name(s) of the development team to decrease the chance of conflicting a panelist out. What they could consider is location, quality of application,

lack of LIHTC development in a region, etc. If they were tasked with developing a score on a 100 point scale, that number could then replace the walkscore.com number with a number that is at least based on facts.

Thank you for your time and consideration!

Sincerely, Jim

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