

Tara Hall

From: Jim Yamin <jim@workforcehomestead.com>
Sent: Wednesday, November 17, 2021 4:17 PM
To: Tara Hall
Cc: Scott Farmer
Subject: 2022 Second draft QAP comment - NO to Walk Score

Importance: High

Tara,

I'm writing to strongly object the inclusion of the Walk Score as a new Site Evaluation category in the second draft QAP. Moreover, introducing this significant feature for the first time in the second draft is flawed process.

If the Agency wants to structurally consign historically underserved rural communities to a second-class status in terms of competitiveness in its scoring matrix, you've chosen a perfect vehicle.

Making matters worse is debuting such a provision in the second QAP draft, effectively preempting any meaningful opportunity for critical feedback from the development community. At best this is a highly controversial feature that begs for robust debate. Historically the second QAP draft ends up being the final version, and for that reason, brand new items should never be included.

Sharpening my objection is the fact that this (all too) simplistic, shiny new algorithmic widget has the real potential to literally decide winners and losers.

I offer a relevant excerpt below, capturing an important perspective from one of the many critical reviews for which I'm offering links below:

Walk Score is still an easy-to-use tool for lay purposes - like finding an apartment with many different destinations close to you (as long as you understand it's not really telling you whether that walk will have sidewalks, trees, curb cuts, lighting, blank street facades, etc.). And most practitioners heretofore are aware that Walk Score fails to capture the micro-scale, "on the ground" built environment features - what I call the look, feel, and touch of walkability - that actually impact people's decisions to walk. **What this study now clearly highlights, however, is that this is not a tool that should be used in the context of the redevelopment of less walkable places (i.e., most of the redevelopment happening in the U.S.) nor in low-income neighborhoods.**

To date, Walk Score has persisted as an easy, shorthand measure of walkability in spite of the fact that many professionals know that it is more precisely a measure of the density (and to some respect, quality) of destinations within a specific walking distance. **But it is one thing to boast about (or bemoan) your latest Walk Score ranking - that's innocuous (although at times infuriating to data geeks like me). It's an entirely different thing to use Walk Score as a metric by which to make planning, private investment, public funding or policy decisions; given these findings, that's irresponsible at best and potentially discriminating at worst.**

While I certainly understand the Agency's desire to find that elusive silver bullet that will finally resolve the perennial problem of an application evaluation system that generates an end result of far too many identical scores, this clearly is not it. Doing so by introducing this impactful and controversial provision for the first time in the second draft QAP is a deeply flawed way in which to advance policy that in practice may well threaten to exacerbate already significant resource inequalities between urban and rural communities.

<https://www.stateofplace.co/our-blog/2016/10/does-walk-score-walk-the-walk>

<https://www.cnu.org/publicsquare/2019/01/10/walkability-indexes-are-flawed-lets-find-better-method1>
https://dash.harvard.edu/bitstream/handle/1/29663388/Forsyth_walkability_082415_final.pdf
<https://www.bloomberg.com/news/articles/2012-08-07/-walk-score-is-great-but-it-still-doesn-t-capture-walk-appeal>
http://www.slate.com/articles/life/walking/2012/04/walking_in_america_how_walk_score_puts_a_number_on_walkability_.html

Thanks,

Jim Yamin, President

Workforce Homestead Inc. | 1534 Twisted Oak Drive, Chapel Hill NC, 27516 | 828-351-9151 |

jim@workforcehomestead.com