



## KABOOM! Comments on the Department of Commerce's Strategic Plan to Advance Environmental Justice

KABOOM! is the national nonprofit dedicated to ending playspace inequity in communities, especially in Black and brown communities, who do not have access to high-quality, safe, and engaging playgrounds because of systemic racism. In the course of doing our work, we have found that the communities who do not have access to outdoor recreational infrastructure also lack adequate shade, have poorer air quality, and are at a significantly higher risk of flooding. It is not a coincidence that the communities which lack access to playgrounds and nature are also urban heat islands where city governments and local zoning boards historically allowed polluting industries to operate. It is therefore imperative that both conditions, the lack of appropriate play infrastructure and racially biased and insensitive economic zoning, are remedied and the Department of Commerce can play an important role in addressing this historic injustice.

As the Department considers how to help revitalize and strengthen local economies it should focus on the role that neighborhood-based development and placemaking can have in fostering equitable economic growth. These approaches not only help strengthen local economies, but they can also help address neighborhood based environmental injustices which are having a disproportionate impact on the lives of people who have the least amount of financial capacity to adapt.

Placemaking and neighborhood-based development provide avenues for broader community engagement in the economic development planning process. Local residents have unique insights into their own communities and the economic activities that can sustain them. Mixed use development, mixed-income housing, the adaptive reuse of existing infrastructure, and the repurposing of vacant spaces for recreation and climate mitigation infrastructure can help spur distributive economic activity and growth. At the same time, these strategies can help cities become more sustainable and climate resilient.

When playgrounds are incorporated into a city's economic and environmental justice plans they can serve multiple purposes that other types of civic infrastructure cannot. In addition to providing spaces for outdoor physical activity, which helps improve health outcomes for children and are vital to their development, they can also be designed to host trees, community gardens, environmental sensors, and solar panels. If they are designed to intentionally address climate change factors, steel and plastic play equipment can be replaced with wood or other natural or recycled materials which can further lower the heat sink effect that the traditionally equipped playgrounds create. The use of permeable surfaces, like cork, can also help with stormwater management and reduce the likelihood of flooding during extreme weather events.

These types of playgrounds can help increase property values, become a vital part of a neighborhood's childcare infrastructure, and provide community spaces that enhance the quality of life and attract new business opportunities. Local residents often voice support for this type of placemaking economic development activity which, along with affordable housing, enhanced mobility options, and neighborhood-based retail, can transform communities without the dangers of displacement and gentrification that other neighborhood development strategies risk.

Unfortunately, too many residents don't even realize this kind of mixed-use infrastructure can play a role in their communities' economic development planning. The Department can develop case studies and share best practices with community-based development organizations, community land-banks, and housing development nonprofits to demonstrate the efficacy of these kinds of investments to help promote greater prosperity and address climate factors which are negatively impacting too many Black and brown residents.

We encourage the Department to also think of more ways to support these kinds of strategies when considering funding eligibility or working with other departments' funding sources which can be braided together to support more comprehensive and cohesive economic and environmental justice strategies. The current climate crisis we are facing necessitates new approaches which leverage all of the available ways cities can become more sustainable.

Thank you for this opportunity to provide comments. The dual public health and climate change crises our residents are facing can be addressed creatively when we start thinking of the variety of uses the same piece of land can serve. When those parcels are integrated into a broader housing and economic development plan they have the potential to transform communities and place them on a path to great economic vitality. We hope the Department embraces the opportunity the Administration's Environmental Justice initiatives present.