



Response to Request for Information from the U.S. Department of Transportation on Advancing a Surface Transportation Proposal That Focuses on America's Most Fundamental Infrastructure Needs

KABOOM! is the national nonprofit whose mission is to end playspace inequity in communities across the country where it exists. We define “playspace inequity” as the reality that children do not have access to high-quality, safe, and engaging outdoor recreational infrastructure. From our work in large cities, small rural towns, and everywhere in between, we know this is a challenge that American families from all walks of life struggle with. Too many children cannot easily go to an outdoor playspace where they can engage in activities that promote strong mental and physical health, play with their peers, and experience moments of genuine childhood joy.

We welcome the opportunity to provide the Department comments on the implementation of traffic safety programs that will be contained in the next surface transportation reauthorization bill. KABOOM! supports efforts at the Department, and across the Administration, which aim to reduce regulatory burdens on local governments, streamline approval processes, accelerate development, make it easier to form partnerships with private entities to achieve public goals, and foster broad-based prosperity in every type of community.

Our first-hand experience working with communities has shown how transformative it can be when local leaders and residents help determine the type and scope of investments that are made. We hope that the Department's implementation of its future traffic safety programs reflects this philosophy.

Over the course of our nearly 30-year existence, KABOOM! has built and improved over 17,000 playspaces to help address the lack of access to outdoor play. From playgrounds in parks and schoolyards to the incorporation of play elements in shared—but unconventional—spaces, our goal is to help communities develop an integrated view of outdoor play infrastructure so that it becomes a ubiquitous part of America's civic infrastructure. While building this infrastructure is a critical component to ending playspace inequity, it is just one aspect of a broader challenge that communities need to address if they want to protect and promote the vital experience of outdoor play for kids.

Another critical component is how to mitigate the dangers that vehicular traffic, especially traffic that leads to and surrounds playspaces, can present to children and families. According to the National Highway Traffic Safety Administration (NHTSA), overall pedestrian fatalities have been steadily rising in



the United States since 2010, with the exception of a slight dip occurring in 2023. And while the number of child fatalities as a percentage of this overall increase has fallen, traffic-pedestrian related deaths still account for almost 18% of the total cause of death of children between the ages of 5-9.

As a national nonprofit that builds child-centered spaces, KABOOM! finds this trend deeply troubling and believes that the federal government, along with local and municipal leaders, should act. It is a common misperception though that enhanced traffic safety means additional traffic congestion and inefficiency. This does not have to be the case, and in fact, KABOOM! believes, and a growing body of research supports, that traffic safety through the creation of a diverse set of mobility options can both lead to fewer accidents and less congestion. This approach has the added advantage of encouraging more families and children to use the outdoor play infrastructure located in their neighborhoods or town centers. That increased level of use can help produce a critical mass of people who can generate small business opportunities, enhance public safety, and engage in civic dialogue activities that make downtowns and neighborhoods vibrant spaces where place-based development is needed.

Working in a cooperative manner with local leaders is vital to the success of this strategy. This also means that local governments, which are typically understaffed and have fewer resources (especially in small to mid-sized cities and rural counties) should have an expedited review of their traffic calming and increased mobility option plans. Even slight bureaucratic delays can impose a significant burden on communities as material and labor costs may increase over time. Trusting local leaders to know how best to serve their communities' transportation and development needs is critical, especially when traffic safety strategies are being developed in conjunction with investments in other types of civic infrastructure like parks, playgrounds, libraries, and main street commercial corridors. Delays in approving the creation or extension of bike lanes, pedestrian malls, trails, signage installation, speed humps, lights, or crosswalks can impede development and delay the subsequent economic and social benefits to be derived from these local initiatives.

KABOOM! also hopes the Department will embrace an "all of the above" approach to the highway safety initiatives it supports. Just as every community has its own unique features, advantages, and challenges, so must every community have the flexibility to choose the type of traffic safety initiative that suits it best. When KABOOM! works with a local government to design and install a new playspace we recognize that local input into the process leads to the best result. We have learned that a design or play feature that works well in one area may not work well in another and so we defer to local preferences, tastes, and intentions. We urge the Department to take a similar approach when working with local communities and provide them with both the expertise and the flexibility to address their long-term traffic safety goals.

Thank you for the opportunity to provide comments on the implementation of programs that directly impact our work and the communities we serve. The traffic safety programs the Department supports are an important component to the development of communities and the long-term health and safety of Americans. We are confident that local leaders will appreciate a Department that supports their innovative approaches to enhancing public safety through calmer traffic, particularly where kids and families spend time. We also hope that the Department's implementation strategy reflects the way transportation and mobility impacts more than just the people who are traveling at any particular moment, though their needs and safety need to remain paramount in the Department's planning. KABOOM! is happy to partner with the Department in any effort that helps promote greater and safer access to playgrounds and other outdoor recreation infrastructure.

