



## **KABOOM! Comments on the U.S. Department of Housing and Urban Development (HUD) Proposed Rule on Submission for Community Development Block Grant Program, Consolidated Plans and Indian Community Development Block Grant Program Changes**

KABOOM! is the national nonprofit whose mission is to eliminate playspace inequity in communities across the country. The root causes behind this type of inequity often lay in the race-based housing, development, and education policies that characterized our public systems throughout the 19<sup>th</sup> and much of the 20<sup>th</sup> centuries. The Biden-Harris Administration's commitment to addressing these systemic causes, through equitable investment programs, environmental justice initiatives, and broad-based and bottom-up economic development plans are key to ending the kinds of disparities which have left many low-income Black and brown residents at a social and economic disadvantage.

The proposed rule aims to make the Community Development Block Grant (CDBG) program a more flexible and responsive tool for communities which aim to tie broader community development to targeted economic development initiatives. KABOOM! supports this course of action. Long-term community prosperity must be tied to improving the economic outlook of the residents living in those communities. This localized approach to spurring sustainable economic activity is vital to placemaking strategies that are the foundation of achievable neighborhood revitalization goals.

There are several practices this proposed allows that would make place-based economic development a more viable strategy for communities. First, the proposed change that would permit the conversion or rehabilitation of nonresidential structures for multi-use, multi-family housing in LMI communities. This is an important expansion that will aid cities which have struggled with quickly increasing the availability of affordable housing while at the same time creating local commercial opportunities which could employ the residents of these areas. Many rust-belt cities are filled with structures that once served as light industrial sites, warehouses, schools, or churches that no longer function in this capacity. Changes to the economic, technological, and demographic landscapes make it unlikely that these buildings will ever be able to resume their purely commercial purpose again. This change recognizes that shift and provides local policymakers an additional tool to support a reuse policy that simultaneously addresses two significant challenges (namely housing and accessible job opportunities) people living in cities face.

KABOOM! employs a community-driven approach to its work. At the outset of any playspace installation we undertake, the community voice is centered in the design process. We believe that playspaces that are designed by the community increase senses of ownership and belonging, which are critical elements to a successful placemaking strategy. That is why the second change KABOOM! supports are the changes to the citizen participation planning process. Any expansion of the public's ability to comment is a welcome change. It will not only make CDBG Consolidated Plans more responsive to residents' aspirations and expectations but increase transparency in the local CDBG investment process. Both consequences will yield a greater level of understanding of how the program impacts peoples' lives and demonstrate the efficacy of CDBG to grassroots community development organizations.

The third practice this proposed rule would permit that KABOOM! supports is the intertwining of different federal programs, like the New Market Tax Credit (NMTC) program, with CDBG or Section 108 funding. This kind of braiding makes it easier for CDBG to be used in a broader economic development context and achieve the three national objectives HUD is asking recipients to focus on. Oftentimes, CDBG and these other federal economic development programs aim to revitalize the same communities but are not able to work in the highly coordinated fashion that the proposed rule change will enable. The challenges Low to Moderate Income (LMI) communities face are multi-faceted in nature, therefore a response to them needs to be multi-dimensional and draw on all the resources the federal government makes available in as cohesive a manner as possible.

Placemaking must be a priority for policymakers and local elected officials. By building playspaces that create "places" for residents KABOOM! helps transform historically disinvested communities and improve the prospects of the people who live in them. We believe that these changes to the proposed rule will help further placemaking policies and expand the neighborhoods we can work in. Strong, vibrant neighborhoods need more than just quality, affordable housing and accessible employment opportunities—though these are essential first steps—they also need amenities like playgrounds, parks, bike lanes, libraries, and community centers. These elements of civic infrastructure transform streets with housing and shops into neighborhoods and build a sense of community.

Thank you for the opportunity to provide these comments and we look forward to working with the Department and our local partners in building stronger communities that serve the needs of every resident.