

BOSTON PRESERVATION ALLIANCE

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November 14, 2025

Ron Cobb

City Council Committee On Environmental Justice, Resiliency, And Parks

CC: Councilor Gabriela Coletta Zapata, Councilor Sharon Durkan

Docket #1850 City Council, City Hall, 5th Floor, Boston, MA 02201

Re: Boston's 2030 Climate Action Plan Draft, Summer 2025

Dear Mr. Cobb,

The Boston Preservation Alliance is the city's primary nonprofit organization dedicated to protecting and promoting Boston's historic buildings, places, and landscapes. In recent years, we have broadened our advocacy to address pressing issues including climate resiliency, housing and small business affordability, and equity in preservation.

With 40 Organizational Members, 134 Corporate Members, and a reach of over 100,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character. We appreciate the opportunity to offer comments on projects and initiatives that impact the historic character of the city.

Today, we are submitting comments on Boston's 2030 Climate Action Plan (CAP) Summer 2025 Draft for the City Council Committee On Environmental Justice, Resiliency, And Parks' hearing on Docket #1850. In recent weeks, we have been in conversation with stakeholders from across the city to discuss the current draft and concerns specific to the historic preservation community.

We commend the draft for outlining specific strategies to reduce the city's carbon output, advance sustainability goals, and center climate justice. However, we encourage the City to broaden its approach by explicitly incorporating practices such as adaptive reuse and retrofitting. Preservation is an inherently sustainable practice that complements the strategies already identified in the plan.

Boston has some of the oldest and most distinctive housing stock in the country, with over 40% of the area's housing units built before 1940. In a city that urgently needs additional housing, many existing buildings must remain in use even as new development supplements the existing building stock by adding density. Extending the life of these buildings through restoration, reuse, and retrofitting not only preserves neighborhood character and affordability, but also significantly reduces embodied carbon by minimizing the upfront emissions associated with new materials and construction. Prioritizing these approaches would strengthen the City's ability to meet its climate and equity goals while maintaining the character and livability of Boston's neighborhoods. The Alliance and our partners are eager to work with the City to develop resources to support these approaches and are confident they will complement the existing CAP strategies.

Additionally, Boston is home to the first public park in America as well as many other famous landscapes. While the CAP incorporates open space strategies, there is no mention of our existing and historic green and open spaces. Plans referencing open and green spaces should connect our past with our present to ensure these resources are protected and utilized as fully as possible.

Finally, historic buildings are essential character-defining elements on the streetscape of every neighborhood in Boston and should be recognized as valuable resources. Beyond their architecture, historic buildings have a positive impact on those who live and work in them and define Boston's unique pedestrian experience. This is particularly important to consider as the city looks towards the 250th anniversary of the signing of the Declaration of Independence and the commemoration of the 400th anniversary of Boston's founding. In collaboration with the undersigned groups and individuals, representing organizations from across Boston, we developed the following priorities:

- The CAP currently has an oversized focus on demolition and new construction. The framing should be adjusted to reflect continuing use and adaptive reuse of existing buildings as the default, with demolition and deconstruction as last options.
- Existing structures, including historic or older building stock, can be updated and retrofitted to become more sustainable and meet modern standards. The CAP should encourage use of existing programs like Historic Tax Credits, the Office to Residential Conversion Program, and the city's Healthy and Green Retrofit Program (when the pilot period is completed) and direct owners of existing buildings to technical resources for rehabilitation and reuse.
- Connections should be made between open space initiatives and historic landscapes.
- Historic preservation tools, like adaptive reuse and retrofitting, should be included by name in the Buildings and Recovery and Materials sections of the CAP.
- Additional sections specific to Historic Buildings & Adaptive Reuse and Food Systems should be considered for additions to future drafts.

We appreciate the urgency with which the City must move forward to enact meaningful climate policies. The Office of Historic Preservation has continued to issue excellent information about the intersection of historic preservation and climate action, including last week's "Preservation in a Changing Climate", and we believe our priorities are aligned with much of the City's existing guidance. As a critical part of the city's culture, economy, and housing stock, Boston's historic resources and existing buildings must be meaningfully included in the 2030 Climate Action Plan.

We look forward to working with the City to incorporate specific strategies and language addressing this need and thank you for your attention to this matter.

Sincerely,

Katherine Davis-Wheeler, Executive Director, Boston Preservation Alliance

Molly Donahue, Director of Advocacy, Boston Preservation Alliance

Susan Pranger, AIA, Boston Resident and Community Activist, Author "Old Materials, New Climate"

Nina Zannieri, Executive Director, Paul Revere Memorial Association/Paul Revere House

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