

**City of Santa Fe  
Historic Districts Review Board  
Findings of Fact and Conclusions of Law**

**Case # 2025-10093-HDRB**

**Address** – 224 and 228 E. Palace Ave.

**Agent’s Name** – Dimitrov Design Studio, LLC

**Owner/Applicant’s Name** – Drury Southwest Santa Fe Inc.

THIS MATTER came before the Historic Districts Review Board (“Board”) for hearing on May 13, 2025.

**BACKGROUND**

The 4.9-acre property located on the southwest corner of Palace Avenue and Paseo de Peralta currently houses the Drury Hotel, which was previously the St. Vincent Hospital. Other structures on the property include the boiler building, which currently houses conference rooms, the 2008-approved parking garage and 2008-approved retail and restaurant spaces. The property holds outside courtyards, seating areas, concrete and red-brick pathways, an open-air hotel parking area, and open access to Cathedral Park to the west. The property is subject to a 2004 phased Development Plan. This application focuses on Marian Hall and the Drury Hotel structures only and is considered Phase 3 of the development plan. Phase 1 is complete, and Phase 2 is incomplete.

The original St. Vincent Sanitarium was built in 1882, founded by Archbishop John Lamy in the location that is now Marian Hall. The Sanitarium was destroyed by fire in 1896, and reconstructed in a craftsman style by Isaac Hamilton Rapp for the Sisters of Charity. The rebuilt St. Vincent Sanitorium reopened in 1910. In 1954, the Sanitarium building was remodeled for use as a convent and was then named Marian Hall. In 1954, just a few years after St. Vincent’s Hospital was built, two corridor walkways were constructed to connect the new hospital to Marian Hall. These corridors were designed by John Gaw Meem and were constructed with the same materials and style as the Hospital. The design included large undivided windowpanes, which would not meet the current standards of the Historic District, but were emblematic of the mid-century modern style Meem was known for.

In 2008 under Case # H-08-095, the Historic Districts Review Board designated Marian Hall as significant to the Downtown and Eastside Historic District with all elevations considered primary because the building retains much of its historic integrity. As part of a remodel the Board approved the removal of non-historic materials, including the stucco finish, cladding on bay windows, the south elevation ADA ramp and handrails, and an addition to the southeast corner. The corridors designed by Meem, which connected the hospital to Marian Hall and were designated non-contributing in the 2008 case, were approved for demolition and demolished in 2011. None of the approved work on Marian Hall under Case # H-08-095 has been completed except for the 2011 demolition of the hallways that connected the hospital to Marian Hall, and the in-kind roof.

The building has been vacant since government offices vacated the property in the early 1990s. The Drury Hotel bought the property in 2001 and included it in their development plan that was approved in 2011 as the final phase of development. The Drury Hotel now requests improvements to Marian Hall as Phase 3 of their approved Development Plan to adaptively reuse the building as an extension of the Drury Hotel.

The Applicant proposes the following exterior alterations:

- 1) Reconstruct a 275-square-foot portion of the walkway, demolished in 2011, which connected the east elevation of Marian Hall to the west facade of the Drury Hotel building. The walkway will be constructed of brick, with a brick coping with concrete cap, exposed concrete header above the windows, painted steel casement windows, painted concrete columns and concrete sills. The windows will consist of larger panes in the same layout as the original walkway. The proposed walkway mimics the original design from John Gaw Meem, as substantiated by documentation and pictorial evidence, and will connect in the same location on each of the two structures as the original walkway. The Staff has determined that this fulfills Santa Fe City Code, Section 14-5.2(D)(5)(b), which requires that replacement or duplication of missing features be substantiated by documentation, physical or pictorial evidence.
- 2) Construct a 92-square-foot addition on the second and third floors of the east elevation of Marian Hall to create a stairwell for egress. An **exception** is requested to SFCC Section 14-5.2(D)(2)(c) for creating an addition on a primary façade.
- 3) Infill two windows on the east elevation of Marian Hall. An **exception** is requested to SFCC Section 14-5.2(D)(5)(a)(iii) for closure of existing openings on a significant structure.
- 4) Replace a window with a door on the east elevation of Marian Hall. An **exception** is requested to SFCC Section 14-5.2(D)(5)(a)(i) to alter the dimensions of a window to create a door on a significant building.
- 5) Replace a window with a door on the west elevation of Marian Hall where documentation and pictorial evidence supports duplication of this missing feature, in accordance with SFCC Section 14-5.2(D)(5)(b). In historic photos a door is shown in this opening.
- 6) Replace windows and doors in Marian Hall. The windows and doors to be replaced are non-historic, 1984 replacements.
- 7) Removal of the second-floor balcony on the west primary façade of the Drury Hotel in order to reestablish the walkway described in Item # 1 above.
- 8) Repair of joints in the brick façade of Marian Hall.
- 9) Repair or replacement of wood elements in kind for existing beams and columns of veranda porch and roof eave outriggers of Marian Hall.
- 10) Replacing exterior concrete stairs at Marian Hall.
- 11) Install exterior lighting at Marian Hall.
- 12) Remove metal guardrail at exterior stairs to basement on the south façade of Marian Hall.
- 13) Remove conduits, flood lights, rooftop equipment on Marian Hall. There is no intention to reestablish any of these items.
- 14) Paint existing brick facades of Marian Hall in Sherwin Williams SW7704, Tower Tan.
- 15) Paint brick facades under porches of Marian Hall in Sherwin Williams SW6385, Dover

White.

- 16) Paint existing wood, concrete and metal trim at Marian Hall in Sherwin Williams SW6385, Dover White.
- 17) Paint wood window frames at Marian Hall in Sherwin Williams SW6385, Dover White.
- 18) Stucco in the existing locations on Marian Hall with stucco finish and color which is to be confirmed but will be to match the existing stucco finish.

### **FINDINGS OF FACT**

After conducting a public hearing and having heard from the Applicant and all interested persons, the Board hereby FINDS, as follows:

1. Land Use Department Staff conducted a preliminary zoning review (“PZR”) and determined that the application appears to meet the underlying zoning standards set forth in the Santa Fe City Code (“SFCC”).
2. Historic Preservation Division Staff reviewed the application and related materials and information submitted by the Applicant for conformity with applicable SFCC requirements, and provided the Board with a written report of its findings (“Staff Report”), which evaluates the factors relevant to the application.
3. Historic Preservation Division Staff Recommendation: Staff’s analysis of the proposed project identified three exceptions to the design standards of the Historic District overlay. The following recommendations summarize the Staff’s analysis of the exception criteria for each request:
  - a. For the proposed 92-square-foot second/third floor addition to the existing stairwell (Item # 2), and for the proposed change of a window to a door (Item # 4) on the Marian Hall east elevation, Staff recommended a finding that the exception criteria have been met and recommended approval of the exceptions.
  - b. For the proposed closure of two window openings on Marian Hall’s east elevation (Item # 3), Staff recommended a finding that the criteria have not been met and recommended denial of the exception.
  - c. Staff recommended approval of the other elements of the application that do not require exceptions, as they comply with SFCC Sections 14-5.2(D), General Design Standards for all Historic Districts, and 14-5.2(E), Downtown and Eastside Design Standards.
4. The project is subject to SFCC Section 14-5.2(C), Regulation of Significant and Contributing Structures.
5. The project is subject to the requirements and general design standards set forth in SFCC Section 14-5.2(D), General Design Standards.
6. The property is located in the Downtown and Eastside Historic District and is subject to the district design standards set forth in SFCC Section 14-5.2(E).
7. Under SFCC Sections 14-2.6(B-C), 14-5.2(A)(1), 14-5.2(C)(2)(a-d & f), 14-5.2(C)(3)(a-b), 14-5.2(C)(4), and 14-5.2(D), the Board has authority to review, approve, with or without conditions, or deny, all or some of the Applicant’s proposed design to assure overall compliance with applicable design standards.

### **New Stairwell for Egress (Item # 2)**

8. The Applicant proposes to construct a 92-square-foot stairwell addition on the east-facing primary façade.
9. Under SFCC Section 14-5.2(D)(2)(c) additions are not permitted to significant structures or to the primary façades of contributing structures.
10. Staff determined that an exception to SFCC Section 14-5.2(D)(2)(c) would be required for approval of project Item # 2, and the Applicant requested an exception.
11. To obtain an exception, the Applicant was required to conclusively demonstrate that the three exception criteria set forth in SFCC Section 14-5.2(C)(5)(b) have been met.
12. Based on the information set forth in the Staff Report and exhibits, and the evidence and testimony presented at the hearing, the Board agrees with Staff's recommended finding that the Applicant has conclusively demonstrated the exception criteria have been met:
  - a. Pursuant to SFCC Section 14-5.2(C)(5)(b)(i), the Board finds that granting the exception would not damage the character of the district because this item is a small addition to a large, institutional building on a side which does not face the street and is set back from the street, which will minimize its public visibility and minimize the impact on the district;
  - b. Pursuant to SFCC Section 14-5.2(C)(5)(b)(ii), the Board finds that the exception is required to prevent a hardship to the Applicant or an injury to the public welfare because egress regulations are a requirement for this adaptive reuse of Marian Hall and it would harm the public welfare and fail to meet the fire code not to have an egress at this end of the hall; and
  - c. Pursuant to SFCC Section 14-5.2(C)(5)(b)(iii), the Board finds that granting the exception would strengthen the unique heterogeneous character of the City by providing a full range of design options to ensure that residents can continue to reside within the Historic Districts because this is a design option necessary for access, which creates an egress connection to the ground floor as required, and other options such as internal access in the existing location is not viable.
13. The Board finds that the Applicant has conclusively demonstrated that all of the exception criteria have been met with respect to project Item # 2.

### **Infill Two Windows (Item # 3)**

14. The Applicant proposes to infill two windows on the east façade.
15. Under SFCC Section 14-5.2(D)(5)(a)(iii), no existing opening shall be closed on a significant structure or on a primary façade of a contributing structure.
16. Staff determined that an exception to SFCC Section 14-5.2(D)(5)(a)(iii) would be required for approval of project Item # 3, and the Applicant requested an exception.
17. To obtain an exception, the Applicant was required to conclusively demonstrate that the three exception criteria set forth in SFCC Section 14-5.2(C)(5)(b) have been met.
18. Based on the information set forth in the Staff Report and exhibits, and the evidence and testimony presented at the hearing, the Board agrees with Staff's finding that the Applicant has conclusively demonstrated that all exception criteria have been met:
  - a. Pursuant to SFCC Section 14-5.2(C)(5)(b)(i), the Board finds that granting the exception would not damage the character of the district because a historic

photograph shows that the windows to be infilled are not original to the building, and their removal will create harmony with the original structure;

- b. Pursuant to SFCC Section 14-5.2(C)(5)(b)(ii), the Board finds that the exception is required to prevent a hardship to the Applicant or an injury to the public welfare, because windows at that location limit the use of the interior space; and
  - c. Pursuant to SFCC Section 14-5.2(C)(5)(b)(iii), the Board finds that granting the exception would strengthen the unique heterogeneous character of the City by providing a full range of design options to ensure that residents can continue to reside within the historic districts, because the removal of the windows will allow full occupancy and maximize the use of this structure, which is presently unoccupied.
19. The Board finds that the Applicant has conclusively demonstrated that all of the exception criteria have been met with respect to project Item # 3.

#### **Replace Window with Door (Item # 4)**

20. The Applicant proposes to change a window to a door on the east façade.
21. Under SFCC Section 14-5.2(D)(5)(a)(i), for all façades of significant and landmark structures, and primary façades of contributing structures, historic windows that cannot be repaired or restored shall be duplicated in the size, style and material of the original, and no opening shall be widened or narrowed.
22. Staff determined that an exception to SFCC Section 14-5.2(D)(5)(a)(i) would be required for approval of project Item # 4, and the Applicant requested an exception.
23. To obtain an exception, the Applicant was required to conclusively demonstrate that the three exception criteria set forth in SFCC Section 14-5.2(C)(5)(b) have been met.
24. Based on the information set forth in the Staff Report and exhibits, and the evidence and testimony presented at the hearing, the Board agrees with Staff's finding that the Applicant has conclusively demonstrated that all exception criteria have been met:
  - a. Pursuant to SFCC Section 14-5.2(C)(5)(b)(i), the Board finds that granting the exception would not damage the character of the district because this is a small alteration to a large, institutional building on a side which does not face the street, and the alteration is set back from the street, which will minimize its public visibility and minimize the impact on the district;
  - b. Pursuant to SFCC Section 14-5.2(C)(5)(b)(ii), the Board finds that the exception is required to prevent a hardship to the Applicant or an injury to the public welfare because the fire code requires egress at this location, and compliance with the fire code prevents injury to the public welfare; and
  - c. Pursuant to SFCC Section 14-5.2(C)(5)(b)(iii), the Board finds that granting the exception would strengthen the unique heterogeneous character of the City by providing a full range of design options to ensure that residents can continue to reside within the Historic Districts, because increased fire safety will facilitate the full usage of this historic, institutional building.
25. The Board finds that the Applicant has conclusively demonstrated that all of the exception criteria have been met with respect to project Item # 4.
26. The Board finds that the construction of the walkway connecting the east elevation of Marian Hall to the west elevation of the Drury Hotel building (Item # 1) and the

replacement of a window with a door on the west elevation of Marian Hall (Item # 5) would replace architectural features which have been removed, as substantiated by documentation and pictorial evidence.

27. The information contained in the Staff Report and exhibits, and the testimony and evidence submitted at the hearing, establishes that all applicable requirements for Board review as herein described have been met.
28. The information contained in the Staff Report and exhibits, and the testimony and evidence submitted at the hearing, establishes that all applicable design criteria have been met.

### **CONCLUSIONS OF LAW**

Under the circumstances and given the evidence and testimony submitted during the hearing, the Board acted upon the application as follows:

1. The Board has the authority to review and approve the application.
2. The Board approves Items # 1-18 as set forth in the application.
3. The Board grants the exceptions requested in the application with respect to project Items # 2, 3 and 4.

**IT IS SO ORDERED ON THIS 13<sup>th</sup> DAY of JANUARY, 2026, BY THE HISTORIC DISTRICTS REVIEW BOARD OF THE CITY OF SANTA FE.**

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Cecilia Rios, Chair

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Date

FILED:

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City Clerk

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Date

APPROVED AS TO FORM:

\_\_\_\_\_  
Frank Ruybalid  
Assistant City Attorney

\_\_\_\_\_  
Date