

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

Case # 2026-12126-HDRB

Address – 515 Paseo de Peralta

Agent's Name – Rebecca Wood, AIA, DNCA Architects, LLC

Owner/Applicant's Name – Georges and Tina Feghali

THIS MATTER came before the Historic Districts Review Board (“Board”) for hearing on April 14, 2026. At that meeting the Board voted to postpone its decision and appoint a Subcommittee to confer with the architects about adjustments to the project’s design. Chair Cecelia Rios appointed Board Members Mary Ellen Degnan and Joe Simmons to the Subcommittee. The matter was presented again to the Board for hearing on May 26, 2026.

BACKGROUND

The property at 515 Paseo de Peralta prominently sits above the street on a sloping lot supported by rock retaining walls along the southern property line, parallel to the street. The single-family residence there is significant to the Downtown and Eastside Historic District, built in 1889 with a Territorial design style highlighted by its brick coping and rough stucco texture. Originally, the residence had a brick exterior; however, stucco appeared in photos as early as 1910. There is a rubble-stone foundation that continues above grade. The south façade features a keyhole opening, where the primary entry door is located. At the western part of the south elevation, concrete steps and a new entry were added in 1943.

An addition on the building’s northeast corner originally served as a garage, then renovated into a bedroom. An additional detached garage was constructed north of the original garage. The free-standing shed, shown on a 1912 Kings Map, is 195 square feet, featuring a gabled roof of corrugated metal. The south elevation is finished with cementitious stucco; the north with a combination of brick and rubblestone. Architectural Historian John Murphey references it as an important contextual structure reflecting the history of stabling work animals on the same site as a residence. The residence was most likely constructed in the 1870s for Samuel Beach Axtell, former Territorial Governor, who held a large tract of land along what was once Hillside Avenue.

Two cases on this property were presented to the Board in 2025. August 12, 2025, in Case 2025-10763-HDRB, the Board voted to retain the significant status of the main residence, excluding the northwest addition, and excluding the original garage addition on the northeast corner. The Board also designated the south retaining wall, including the entry steps, as significant; and designated the shed and detached garage as non-contributing, and the other retaining walls as non-contributing. October 28, 2025, in Case # 2025-11354-HDRB, the Board voted to approve the demolition of the two non-contributing additions, the two non-contributing detached structures, the small yard wall, retaining wall, shed and a small set of stairs.

At the April 14, 2026, HDRB meeting, members raised concerns about the new

massing's overall appearance and its potential to overwhelm the historic building. Suggestions included moving the addition farther west and lowering the garage's height. The Board created an ad hoc subcommittee to work with the applicant to mitigate the overall size of the proposed addition. The Staff has reviewed the resubmittal and studies provided by the Applicant.

The Applicant proposes the following exterior alterations:

1. Place an addition to the north, rear of the building. The new area of the addition, including a second floor, will total 3,470 square feet. The primary mass of the proposed addition will be set back 12 feet from the historic house, connected to the original house at places on the north facade already altered by previous, non-contributing additions that are approved for demolition. Exceptions are required for an addition to a primary façade, prohibited by Santa Fe City Code ("SFCC") Section 14-4.6(E)(2)(II)(a), and for an addition which exceeds 50 percent of the historic footprint, prohibited by SFCC Section 14-4.6 (E)(2)(II)(c).

2. Remove the existing entry stairs on the south façade and rebuild them in kind, adding a second stairway to the west of the front portal, symmetrical to the stairs on the east. Remove and replace the stairs and landing at the west setback of the south façade, following their current orientation and matching the porch stairs. Add a connected landing between both sets of stairs and extending to the east façade. An exception is required for removal of historic materials or alteration of architectural features and spaces that embody the status of a significant structure, which is prohibited by SFCC Section 14-4.6(E)(1)(I).

3. Raise a portion of the roof behind and below the existing parapet.

4. Existing exterior materials will be repaired in kind with respect to the building's unique texture and color.

5. Replace and/or repair the doors and windows in kind.

6. Place a new wood picket fence at least 1 foot behind the stone wall, running the width of the Paseo de Peralta property line, with a branches extending north along the driveway and western property lines.

7. Place new 4-foot-high stucco site walls adjacent to the addition.

The Staff recommended the Applicant to use a color from the surrounding buildings' palette so that the addition blends in with the surrounding development. By changing the color of the addition, it will read almost as a separate building because the passageway between the buildings will be between the old and new structures and not visible from the street.

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

Finding of Fact and Conclusions of Law – Remodel or New Construction

Case # 2026-12126-HDRB

p. 2

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 recommended findings that:
 - The exception criteria had been conclusively demonstrated for placing an addition on a primary façade (project Item # 1), otherwise prohibited by SFCC Section 14-4.6(E)(2)(II)(a);
 - The exception criteria had been conclusively demonstrated for building an addition which exceeds 50 percent of the historic footprint (Item # 1), otherwise prohibited by SFCC Section 14-4.6(E)(2)(II)(c);
 - The exception criteria had been conclusively demonstrated for replacement of the stairs and addition of new stairway on the southern façade, which will remove historic materials and alter architectural features of a significant building (Item # 2), otherwise prohibited by SFCC Section 14-4.6(E)(1)(I); and
 - The other elements of the application (Items 3-7) comply with SFCC Section 14-4.6(E), General Design Standards for all Historic Districts, and 14-4.6(G)(2), Downtown and Eastside Historic District Design Standards, and should be approved.
4. The project is subject to SFCC Section 14-4.6(C), Regulation of Significant and Contributing Structures.
5. The project is subject to the requirements and general design standards set forth in SFCC Section 14-4.6(E), 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 14-4.6(G)(2).
7. Under SFCC Sections 14-2.2(3)(I)(a-c), 14-4.6(A)(1), 14-4.6(3)(I), 14-4.6(3)(II), 14-4.6(3)(III)(a-b) and 14-4.6(E), 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.

Addition on Primary Façade:

8. The Applicant proposes to construct an addition (project Item # 1) on a primary façade, the northern elevation, of a significant structure.
9. Under SFCC Section 14-4.6(E)(2)(II)(a), building additions are not permitted on primary façades. The Staff determined that an exception to SFCC Section 14-4.6(E)(2)(II)(a) would be required for approval of the application, and the Applicant requested an exception.
10. To obtain an exception, the Applicant was required to conclusively demonstrate that the three exception criteria set forth in SFCC Section 14-4.6(D)(2)(II) have been met.
11. 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 all the exception criteria:
 - a. Pursuant to SFCC Section 14-4.6(D)(2)(II)(a), the Board finds that granting the exception would not damage the character of the district because the addition is at the rear of the structure, on the side opposite the street, it replaces non-

- contributing massings of the residence which have inconsistent architectural styles, and most of the original north façade will remain intact;
- b. Pursuant to SFCC Section 14-4.6(D)(2)(II)(b), the Board finds that the exception is required to prevent a hardship to the Applicant or an injury to the public welfare because the structural integrity of the existing shed, garage and rear retaining wall is compromised, and are unusable to the property owners; and
 - c. Pursuant to SFCC Section 14-4.6(D)(2)(II)(c), 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 demolition has been approved for the structures and massings on the north part of the lot, to the rear of the residence, and for them to be replaced by an addition that does not connect to the house would limit the owners' use of the addition.
12. The Board finds that the Applicant has conclusively demonstrated that all the criteria have been met with respect to the exception for an addition to a primary façade.

Addition Exceeding 50 Percent of Historic Footprint:

13. The Applicant proposes to construct an addition with a footprint of $\pm 2,256$ square feet to a significant structure with a historic footprint of 2,776 square feet, which would exceed 50 percent of the historic footprint and would exceed 50 percent in linear feet of the primary façade.
14. Under SFCC Section 14-4.6(E)(2)(II)(c), building additions shall not exceed 50 percent of the square footage of the building's historic footprint and shall not exceed 50 percent in linear feet of the primary façade. The Staff determined that an exception to SFCC Section 14-4.6(E)(2)(II)(c) would be required for approval of the application, and the Applicant requested an exception.
15. To obtain an exception, the Applicant was required to conclusively demonstrate that the three exception criteria set forth in SFCC Section 14-4.6(D)(2)(II) have been met.
16. 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 all the exception criteria:
- a. Pursuant to SFCC Section 14-4.6(D)(2)(II)(a), the Board finds that granting the exception would not damage the character of the district because the existing single-family structure is the only living unit on a .344-acre lot, in a neighborhood where the density is 21 units per acre, meaning that the lot is underutilized;
 - b. Pursuant to SFCC Section 14-4.6(D)(2)(II)(b), the Board finds that the exception is required to prevent a hardship to the Applicant or an injury to the public welfare because almost 700 square feet of massings on the property is architecturally inconsistent with the main historic residence, the garage and a shed with a combined 365 square feet of roofed area are structurally unsound and are approved for demolition, and the addition will replace the garage and shed and infill an area between the two structures; and
 - c. Pursuant to SFCC Section 14-4.6(D)(2)(II)(c), 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 additional living space will allow

the owners to age in place, and the second dwelling unit will create a space for tenants, consistent with the medium density of the neighborhood.

17. The Board finds that the Applicant has conclusively demonstrated that all the criteria have been met with respect to the exception for an addition exceeding 50 percent of the historic footprint of the structure.

Removal of Historic Material and Alteration of Architectural Features:

18. The Applicant proposes to remove and reconstruct a set of stairs in-kind on the west end of the south-facing façade; add a stairway to the west of the front portal, symmetrical to the stairs on the east of the portal; and add a connected landing between both sets of stairs, extending to the east façade.
19. Under SFCC Section 14-4.6(E)(1)(I), the removal of historic materials or alteration of architectural features and spaces that embody the status of a significant building is prohibited. The Staff determined that an exception to SFCC Section 14-4.6(E)(1)(I) would be required for approval of the application, and the Applicant requested an exception.
20. To obtain an exception, the Applicant was required to conclusively demonstrate that the three exception criteria set forth in SFCC Section 14-4.6(D)(2)(II) have been met.
21. 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 all the exception criteria:
 - a. Pursuant to SFCC Section 14-4.6(D)(2)(II)(a), the Board finds that granting the exception would not damage the character of the district because historic photos show that the portal had a set of stairs, which has since been removed, connecting to it on the west side. The replacement of missing architectural features is supported by the Historic Districts Code, SFCC Section 14-4.6(E)(4)(II)(c), where supported by documentation, physical or pictorial evidence;
 - b. Pursuant to SFCC Section 14-4.6(D)(2)(II)(b), the Board finds that the exception is required to prevent a hardship to the Applicant or an injury to the public welfare because the supporting structure of the stairs on the west end is structurally compromised. The existing space under the portal is minuscule, approximately 50 square feet, and the extended landing will allow greater accessibility to the front entrance, and creates a walkway from the street to the front porch; and
 - c. Pursuant to SFCC Section 14-4.6(D)(2)(II)(c), 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, due to the slope of the lot, the outdoor space is practically unusable without a man-made, flat surface, and the additional stairs and extended landing will expand the use of the outdoor space on this lot.
22. The Board finds that the Applicant has conclusively demonstrated that all of the criteria have been met with respect to the exception for removing and reconstructing stairs, and adding a new stairway and wrap-around landing on the south elevation.
23. The height of the proposed addition will be 24 feet, which exceeds by one foot the maximum allowable height for this streetscape, which is 23 feet. The Board finds that

this is a sloping site where the difference in the natural grade along the structure's foundation exceeds two feet. Per SFCC Section 14-4.6(F)(2)(II)(f), the Board grants a one-foot increase in the allowable height of the addition, and finds that the increase in height will be constructed in the form of a building setback from the street.

24. Consistently with a report by RPA & Associates, LLC, window assessment professionals, the Board approves the following treatment for the windows and doors of this structure, per Item # 5 of the project proposal:
- Windows A, B and C, and door # 3, east elevation; and windows I and J, west elevation; are historic and restorable, and must be restored, not replaced;
 - Window K, north elevation; and doors # 1 and 2, south elevation; are not historic, may be replaced, and replacement must be in-kind; and
 - Windows D, E, G and H, south elevation; and window F, west elevation; are historic but are not restorable, may be replaced, and replacement must be in-kind.
25. Per SFCC Section 14-4.6(C)(3)(III), the Board has the authority to approve an application for alteration or new construction on the condition that changes relating to exterior appearance recommended by the Board be made, and no permit is to issue until new drawings or documentation, satisfactory to the Board, have been submitted.
26. 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.
27. 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, subject to the conditions imposed by the HDRB, as described below.

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 the project as set forth in the application, as recommended by Staff, with the following additional condition:
 - a. The corners of the new building will be rounded in the range of 1.5 to 2 inches in radius.
3. The Board grants the three exceptions requested in the application with respect to project elements # 1 and 2.

IT IS SO ORDERED ON THIS 22nd DAY of SEPTEMBER, 2026, BY THE HISTORIC DISTRICTS REVIEW BOARD OF THE CITY OF SANTA FE.

Cecilia Rios, Chair

Date

FILED:

Geraldyn Cardenas

Date

Interim City Clerk

APPROVED AS TO FORM:

Frank Ruybalid
Assistant City Attorney

Date