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

Case # 2025-11230-HDRB
Address – 527 Agua Fria St., Units 1, 2 & 3
Agent's Name – Richard Woodbury, Osage Design Studio
Owner/Applicant's Name – Neirika, LLC

THIS MATTER came before the Historic Districts Review Board ("Board") for hearing on January 13, 2026.

BACKGROUND

The 3,017-square-foot multi-family residence at 527 Agua Fria St., Units 1, 2 and 3, sits on a 0.418-acre lot, was constructed by 1908 and is listed as contributing to the Westside-Guadalupe Historic District. The south and east elevations are designated as the primary façades. The residence was constructed in a vernacular manner, with thick, stucco-plastered walls, red-tiled roofs and ornate archways, with large, symmetrical façades designed for warmth and indoor-outdoor living. The walls are concrete and stucco in light tan, most windows are 8-lite wood casements in pairs and trios, and a few picture windows. The doors are wood, with the front south door being curved to match the curve in the portal. The residence is currently a three-unit structure that is being converted to a main residence with a guest house.

The roof has red, corrugated-metal shingles, simulating a tile roof, with gables of various heights, gable horns and exposed rafters. The roof heights vary, with the lowest at 7'10" and the highest at just under 20 feet. According to a 1997 Historic Cultural Properties Inventory, the roof was changed to the existing simulated-tile roof in 1920-1925. According to the 2025 HCPI, the original roof was a flat roof with drainage to the north. At some point, an offset, cross-gabled roof was added, raising the elevations of the residence. The lower roofs covering the front porches and side and back additions have a combination of metal-tile and standing-seam surfaces. The south portal has a gable roof with a round arched opening. The southeast corner portal has a shed roof and stucco piers.

The streetscape for this property runs from just east of De Fouri Street to Romero Street. The buildings are a variety of Spanish Pueblo Revival, Territorial, and vernacular flat roof homes, as well as a variety of pitched-roof homes. The homes are in lighter brown stuccos with white, brown and blue trims and natural wood elements. There are several properties with metal elements as well.

The Applicant proposes to:

1) Replace windows and doors with divided-lite windows as follows. An exception is requested to Santa Fe City Code Section 14-5.2(D)(5)(a) for replacement of windows on primary façades:
    a. Window replacement in the same size opening at F, G, H, I, J, L, M, O, P, R, S, T

and V. Windows F, G, H, I and J are historic, restorable and located on primary façades. Window O is historic, however it is unrestorable. Windows L, M, P, R, S and T are non-historic.

b. Replace window E, which is non-historic on a non-primary façade, with a different-sized window.
c. Window Q will be infilled as part of the structural changes on the north elevation. This window is non-historic and not located on a primary façade.
d. Window N will be converted to a door. Window N is historic, however, not part of the original house and not located on a primary façade.
e. Install two new windows in the north-elevation addition wall where there are currently no openings.
f. Cut a new door opening at the accessory dwelling unit.
g. Doors 1 and 3, on the primary south façade, are to be replaced with windows; both are non-historic.
h. Door 2, which is non-historic on the south primary façade, is to be replaced without a size change, but the shape will be changed to rectangular with no arc, and the swing will be reversed.
i. Door 4 will be increased in size. According to the window assessment it is historic, but it is not located on a primary façade. The current unit has cut stiles and rails and is lacking in structural integrity.
j. Doors 5 and 6, which are non-historic and are not located on a primary façade, will be removed with the reconstruction of the addition.
k. Door 7 will be decreased in size to convert from a vehicle door to a pedestrian door. This door is currently missing and is not located on a primary façade.
l. The east and south gable diamond vents (U and V) are to be replaced with metal louvered vents for attic exhaust, and painted white to match the fascia. The east and south gable vents should open for venting, however, they have glass on the inside and do not vent to facilitate attic airflow.

2) Raise the roof of the lower section of the north elevation, currently at 7'10", to a height of 9'8", and re-roof to match the existing. The slope of the roof will be lessened to minimize the overall height change. This portion of the roof is not located on a primary façade.
3) Construct a 36-square-foot addition to a height of 11'2", where the maximum allowable height is 17'8", on the north elevation. The addition will have a pre-finished metal gutter, downspout, and rain barrel. The addition is not on a primary façade nor is it within 10' of a primary façade.
4) Replace a chimney to meet current fire code and remove the metal flue for the wood stove that is currently on the northwest roof area. The chimney and flue are not located on primary façades.
5) Construct a 6-foot-high coyote fence with 6-foot-high pedestrian gates on the north of the residence to replace the existing 6-foot-high wood plank fence.
6) Repair and stucco the unstatused front yard wall and replace the pedestrian gate with a new wood gate with solid wood rails and a flat wood panel, painted to match the existing fascia. The stucco shall be cementitious and will match the existing color.
7) Install a flagstone path from the front gate to the front door and replace the flagstone on the floor of the portal.

8) Install exterior steps with handrails at the exterior doors on the north elevation.
9) Stucco the residence in cementitious stucco to match the existing color. The fascia will be painted white.

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 recommended a finding that the exception criteria have not been met and recommended denial of the exception to SFCC Section 14-5.2(D)(5)(a) for replacement of historic windows and vents on primary façades (Items 1(a) and 1(l)). Otherwise, staff recommended approval of the other elements of the application, as they comply with SFCC Section 14-5.2(D), General Design Standards for all Historic Districts, and 14-5.2(I), Westside-Guadalupe Historic District 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 Westside-Guadalupe Historic District and is subject to the district design standards set forth in SFCC Section 14-5.2(I).
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.
8. Under SFCC Section 14-5.2(D)(5)(a), for all façades of significant and landmark structures, and for the primary façades of contributing structures:
    i. Historic windows shall be repaired or restored wherever possible. Historic windows that cannot be repaired or restored shall be duplicated in the size, style, and material of the original. No opening shall be widened or narrowed;
    ii. No new opening shall be made where one presently does not exist unless historic documentation supports its prior existence; and
    iii. No existing opening shall be closed.
9. The Applicant proposes to replace historic windows on the primary façade of a contributing structure, and to replace diamond vents with metal louvered vents on the gables of primary façades.
10. Staff determined that an exception to SFCC Section 14-5.2(D)(5)(a) would be required for approval of these elements of the application, 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. Consistently with the Staff's determination, the Board finds that windows F, G, H, I and J, and the gable diamond vents on the east and south elevations, are historic windows or fenestrations in repairable condition, and they are on primary façades of a contributing structure.
13. 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 the Staff's finding that the Applicant has not conclusively demonstrated that the exception criteria have been met with respect to replacement of windows F, G, H, I and J, or for replacement of the diamond gable vents on the primary south and east façades:
    a. Pursuant to SFCC Section 14-5.2(C)(5)(b)(i), the Board finds that granting the exception would damage the character of the district because the proposal would remove character-defining features from the primary façades that can otherwise be repaired;
    b. Pursuant to SFCC Section 14-5.2(C)(5)(b)(ii), the Board finds that the exception is not required to prevent a hardship to the Applicant or an injury to the public welfare because it is not a hardship to make repairs rather than replacement, and there is no injury to the public from the existing condition of these windows and the configuration of the diamond gable vents; and
    c. Pursuant to SFCC Section 14-5.2(C)(5)(b)(iii), the Board finds that granting the exception would not 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 there is no showing that to repair historic windows, or to leave the diamond gable vent configuration in place would impair the habitability or comfort of the house.
14. The Board finds that the Applicant has failed to conclusively demonstrate that all of the exception criteria have been met for replacement of historic windows F, G, H, I and J.
15. The Board finds that the Applicant has failed to conclusively demonstrate that all of the exception criteria have been met for conversion of the gable diamond vents to metal louvered vents.
16. With respect to other windows and doors on this property, the Board finds that they are not protected by the restrictions set forth in SFCC Section 14-5.2(D)(5)(a):
    a. Windows A, B, C, D, E, K, L, M, P, Q, R, S and T, the gable door on the north elevation, and doors # 1, 2, 3, 5 and 6, are not historic; and
    b. Windows N and O, and door # 4, are historic but they are not on primary façades.
17. The Board finds that an exception to SFCC Section 14-5.2(D)(3) or 14-5.2(D)(6) is not necessary to raise the height of the first-story roof on the north-elevation kitchen/ bathroom massing to a height of 9'8" (Item # 2), since the maximum allowable height of the building is 17'8", and the height augmentation at this projection will not increase the height of the main structure and will not change the roof style.
18. Under SFCC Section 14-5.2(C)(3)(b), 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 in the proposed work, and no

permit is to issue until new drawings or documentation, satisfactory to the Board, have been submitted.

19. 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.
20. 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 project Items # 1(a) through 1(k), and 2 through 9, except for replacement of windows F, G, H, I and J in Item # 1(a); windows F, G, H, I and J must be restored, not replaced.
3. The Board approves Item # 1(h), as outlined in the Application, with the following additional condition:
    a. That the door arc shall not be altered.
4. The Board denies the exception requested in the application for the replacement of windows F, G, H, I, and J as listed under Item # 1(a), and denies the exception for conversion of the gable diamond vents on the primary façades to metal louvered vents, as listed under Item # 1(l).
5. The Board approves the restoration of the gable diamond fenestration to their full function as attic exhaust vents by any manner which preserves the existing four-diamond configuration.

IT IS SO ORDERED ON THIS 13th DAY of OCTOBER, 2026, BY THE HISTORIC DISTRICTS REVIEW BOARD OF THE CITY OF SANTA FE.

_____ _____
Cecilia Rios, Chair Date

FILED:

_____ _____
Geralyn Cardenas, City Clerk Date

APPROVED AS TO FORM:

_____ _____
Frank Ruybalid Date
Assistant City Attorney