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 13th DAY of JANUARY, 2026, BY THE HISTORIC DISTRICTS REVIEW BOARD OF THE CITY OF SANTA FE.

_____ _____
Cecilia Rios, Chair Date

FILED:

_____ _____
City Clerk Date

APPROVED AS TO FORM:

_____ _____
Frank Ruybalid Date
Assistant City Attorney

Regular Meeting of the Historic Districts Review Board
May 13, 2025 at 5:30 PM
Council Chambers, City Hall
200 Lincoln Avenue

Meeting Minutes
https://www.youtube.com/watch?v=hvbjsVPJedg

Call to Order
Chair Rios called the regular meeting of the Historic Districts Review Board to order at approximately 5:30pm in the City Council Chambers, City Hall, Santa Fe, New Mexico.

1. **Roll Call**
Roll Call indicated the presence of a quorum as follows:

Members Present
Ms. Cecilia Rios, Chair
Mr. John Bienvenu, Vice Chair
Ms. Jennifer Biedscheid
Ms. Madelein Aguilar Medrano
Ms. Mary Ellen Degnan
Mr. Scott Cherry

Members Absent
Ms. Amanda Mather (excused)

Others Present
Ms. Heather Lamboy, Planning and Land Use Director
Mr. Gary Moquino, Historic Preservation Division Manager
Mr. Frank E. Ruybalid, Assistant City Attorney
Ms. Amanda Romero, Senior Planner
Ms. Lani McCulley, Senior Planner
Mr. Paul Duran, Senior Planner
Ms. Mariah Kavanaugh, Planner Technician

Note: All items in the Board packet for all agenda items are incorporated herewith by reference. The original Board packet is available on Civic Clerk and can be requested from the Historic Preservation Division.

2. **Approval of Agenda**

Board Action:
Member Biedscheid moved to approve the application as submitted. Member Aguilar Medrano seconded. The motion passed with the Board voting unanimously in a roll call vote (4-0).

g. **2025-010093-HDRB, 224 and 228 E. Palace Ave.**, Downtown and Eastside Historic District, Significant and Contributing, Dimitrov Design Studio LLC, Tiho Dimitrov, agent for Drury Southwest Santa Fe Inc., owner, reestablishing the walkway connecting Marian Hall (significant) to the Drury Hotel (contributing), construct a 92 sq. ft. second and third floor addition, change a window to a door and infill windows on a primary facade, replace non-historic windows and doors, exterior lighting, and other renovations. Three exceptions are requested for Marian Hall to 14-5.2(D)(2)(c) for constructing an addition on a primary façade, 14-5.2(D)(5)(a)(i) changing a window to a door on a primary façade, and 14-5.2(D)(5)(a)(iii) for infilling windows on a primary façade.

Lani McCulley presented the case and staff recommendation. Staff recommended that for the exception to section 14-5.2(D)(2)(c) found that the exception criteria had been met and recommended approval of the exception, section 14-5.2(D)(5)(a)(i) staff found that the criteria have been met and recommended approval of the exception and section 14-5.2(D)(5)(a)(iii) staff found that the criteria have not been met and recommended denial of the exception. Staff recommended approval of the other elements of the application that did not require exceptions as they complied with 14-5.2(D) General Design Standards for all Historic Districts, and 14-5.2(E) Downtown and Eastside Design Standards.

Chair Rios stated that the color of the brick was being replaced in kind and asked about the color of the brick.

Ms. McCulley confirmed it is the "tower tan".

Chair Rios confirmed the windows will be replaced in-kind with insulated windows and asked if a window assessment was done.

Ms. McCulley stated a window assessment was not required because all of the windows were replaced in 1984 and are not historic.

Member Bienvenu confirmed that the windows that are subject to the exception request number three to be infilled were not original window openings.

Ms. McCulley confirmed that the small addition they are in is not original but is historic in its own right because it was constructed in 1954.

Member Bienvenu asked how the proposed color compared to the current color.

Ms. McCulley stated the colors match.

Tiho Dimitrov, 227 East Palace Avenue Suite C, Santa Fe, NM, was sworn in. Mr. Dimitrov. Stated the tower tan color proposed is very similar to the current color, the goal is to be similar to the hotel building without matching. It is not set in stone, so the applicant is willing to accept the requested changes.

Member Bienvenu asked if the sections of stucco on the structure were to be retained as stucco.

Mr. Dimitrov stated it is a primary façade and there is no proposed change to it. The plan is to keep the color existing but again is willing to take suggestions if there are objections to the existing color.

Member Bienvenu confirmed that it is a contrast in color and asked when the color dates from.

Mr. Dimitrov pointed out the photos show the stucco but they are black and white photos so there is no way to know the date of the color.
Member Cherry asked if the texture of the stucco would be retained.

Mr. Dimitrov confirmed it would be retained.

Member Aguilar Medrano stated she did not have an issue with the enclosing of the two windows on the east since they are not original to the building and when compared to the two bays of windows above that these two kind of break that pattern so by infilling them, it will make that side of the building more symmetrical and those three openings as they are don't really match the rhythm of the windows on the very right side of that building. She stated she did not see a reason not to approve that exception as well.

Public Comment:
Ms. Stefanie Beninato, previously sworn in, stated she was happy that the applicant went with the John Gaw Meem design for the walkway. She had no opposition to infilling the two windows even though they are from 1954. She added a little story about Marian Hall. At one point Tony

Anaya was elected governor, and he was going to change public building names to honor his donors and the state historian at the time Stan Hordes. Tony had one of his cronies call up the state historian to go through the list of names that they were considering changing and at one point the crony said to Stan Hordes "Well who is this Marion anyway?" And Stan who is Jewish said to him "I think you would call her the mother of God." And then there was a long pause, and the man said, "I guess we'll keep that one."

Member Degnan stated that she was very grateful to him.

Chair Rios stated she was grateful the building was being remodeled because she used to work in the building.

Member Cherry asked about the stuccoed box under the portal.

Mr. Dimitrov stated he thought it was concealing mechanical and plumbing and there was no change to the box planned but the stucco will be redone.

Member Bienvenu stated he appreciated the undertaking as it was really beneficial to the project and great for the Board and public. He was grateful to the applicant for taking into consideration the Boards comments at that hearing and mimic or reconstruct the walkways. He felt the infilling of the windows was not detrimental to the primary façade.

Board Action:
Member Bienvenu moved that findings be entered that all exception criteria for the three requested exceptions have been established by the applicant in the application as well as in testimony tonight for all the reasons set forth in staff's report with the additional reasoning that the exception criteria have been established with respect to the info of the two windows because on the basis that those windows were not original to the building as originally constructed and will not adversely affect the aesthetic characteristics of that façade and may even potentially improve the character of that facade and for based on those findings and the fact that the application in all other respects meets the criteria established in our ordinance that the application be approved as submitted. Member Biedscheid seconded. The motion passed with the Board voting unanimously (5-0).

9. **Discussion Items**
Attorney Ruybalid announced that he will not be at the next hearing on May 27, 2025. Assistant City Attorney Kevin Nault will be covering for him at the meeting.

10. **Matters from the Board**
Bienvenu brought up the question about proper posting on private drives. He did not feel the posting was adequate with the posting at least 40 feet down the driveway. The point of the notice is to let the neighbors and public come to the hearing to make comments and it deprives them of this opportunity. The code asks for the posting to be prominent. He would like to see that this be better addressed in the code rewrite.

The same case had a status and remodel at same hearing. In the past these have been separate hearings to avoid influencing a decision.

Director Lamboy stated that it is correct these are usually at subsequent meetings. This case is an exception due to the need to make the HCPI part of the official record and there were sufficient changes to the building so there was no change to the status of non-contributing being requested.

Chair Rios emphasized it is important to keep the cases separate to avoid influencing the decisions of the Board.

Director Lamboy noted that the project to update the status map, which was last updated in 1997, should be ready to be approved by the Board most likely in July. This should be updated annually. The framework for the updates will need to be added into the code rewrite.

Chair Rios suggested that when a case that comes before the Board is thought that it is an amazing project worthy of an award the Board should notify the staff at that time so they can better participate in the nominations for the awards.

Member Biedscheid mentioned that several applicants felt there were undue delays in getting to the hearing and while she recognizes that staff is busy, she wondered if this is a temporary problem or if there is something that can be done to facilitate the applicants.

Mr. Moquino explained some applicants are delayed for incomplete application.

Director Lamboy further explained that the PZR is required as part of the submittal and there have been temporary delays there. A preliminary zoning is required for the application to be accepted.

Member Cherry asked if there were one or two submittal deadlines per month.

Director Lamboy explained there is currently only one and the cases are balanced between the agendas. That was a change made under Carly Piccarello a few years ago and it seemed to work better for processing the cases. There is a three-day period where additional information is requested.

Chair Rios asked about the updates to the city website.

Director Lamboy stated the City Clerk would be the ones to do this update.

Ms. Romero confirmed that the update has happened.

Chair Rios invited everyone to the Heritage Preservation Awards on Thursday.

City of Santa Fe

Land Use Department
200 Lincoln Ave.
Santa Fe, New Mexico 87504-0909

PROJECT DESC: 2025-010093-HDRB, 224 and 228 East Palace Avenue, Downtown and Eastside Historic District, Significant and Contributing, Dimitrov Design Studio LLC, Tiho Dimitrov, agent for Drury Southwest Santa Fe Inc., owner, proposes to construct a 275 sq. ft. addition connecting Marian Hall to the Drury Hotel to a height of 13'-4", on Marian Hall construct a 92 sq. ft. second and third floor addition, alter four fenestrations, replace non-historic windows and doors , exterior lighting, and other renovations. Four exceptions are requested for Marian Hall to 14-5.2(D)(2)(c) for constructing an addition on a primary façade, 14-5.2(D)(5)(b) changing a window to a door on a primary façade, 14-5.2(D)(5)(a)(iii) for infilling windows on a primary façade, and 14-5.2(E)(1)(c) for installing windows with panes greater than 30 inches and one exception is requested for Drury Hotel to 14-5.2(D)(2)(c) for constructing an addition on a primary façade.

CASE NUMBER: 2025-010093--HDRB

PROJECT TYPE: Remodel

LOCATION: 224 E PALACE AVE
Santa Fe, NM 87501

CONTACTS:		
Applicant	TIHO DIMITROV	227 E Palace Avenue Suite C 1/2 SANTA FE , NM 87501
Property Owner	Eduardo Robinson	

BOARD ACTION

This is to certify that the Historic Districts Review Board (HDRB) acted on your request at their hearing on May 13, 2025. The decision of the Board was to approve the application as submitted finding that all exception criteria have been met.

For further information please call 505-955-6605.

Sincerely,

Lani McCulley

NOTE: Applicant can use this action letter to apply for construction permit, but the permit shall not be released until the end of the appeal period which starts on the date of filing of the Findings and Conclusions in the City Clerk's office (SFCC 14-3.17(D)). Your permit will be denied if any changes on plans that were not approved by the HDRB or if conditions of approval are not met. **Please attach copies of this letter to all sets when submitting for construction permits.**

City of Santa Fe, New Mexico

memo

DATE: **May 13, 2025**

TO: **Historic Districts Review Board Members**

VIA: **Heather Lamboy, Planning & Land Use Department Director** HLL
Maggie Moore, Assistant Land Use Director MRM
Gary Moquino, Historic Preservation Division Manager GM

FROM: **Lani McCulley, Senior Planner, Historic Preservation Division** LJM

2025-010093-HDRB, 224 and 228 East Palace Avenue, Downtown and Eastside Historic District, Significant and Contributing, Dimitrov Design Studio LLC, Tiho Dimitrov, agent for Drury Southwest Santa Fe Inc., owner, propose to reestablish the walkway connecting Marian Hall (significant) to the Drury Hotel (contributing), construct a 92 sq. ft. second and third floor addition, change a window to a door and infill windows on a primary facade, replace non-historic windows and doors, exterior lighting, and other renovations. Three exceptions are requested for Marian Hall to 14-5.2(D)(2)(c) to construct an addition on a primary façade, 14-5.2(D)(5)(a)(i) to change a window to a door on a primary façade, and 14-5.2(D)(5)(a)(iii) to infill windows on a primary façade.

REFERENCE ATTACHMENTS (Sequentially):

CITY SUBMITTALS

____ **District Standards & yard wall & fence standards.**

__x__ **Historic Inventory Form**

__x__ **Zoning Review Sheet**

__x__ **Other**: [development plan, previous case documents, photos]

APPLICANT SUBMITTALS

__x__ **Proposal Letter**

__x__ **Site Plan/Floor Plan**

__x__ **Elevations**

__x__ **Photographs**

__x__ **Other:** [exception criteria]

STAFF RECOMMENDATION:

Staff's analysis of the proposed project identified 3 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 more detailed analysis and the applicant's responses can be found in the Exception Criteria and Response section of this report.

1) **14-5.2(D)(2)(c)** *Additions are not permitted to primary facades*. For the proposed 92 sq. Ft. second/third floor addition to the existing stairwell on Marian Hall's east elevation, staff finds that the exception criteria have been met and recommends **approval** of the exception.
2) **14-5.2(D)(5)(a)(i)** *For all façades of significant, contributing and landmark structures, architectural features, finishes, and details other than doors and windows, shall be repaired rather than replaced. Historic windows that cannot be repaired or restored shall be duplicated in the size, style, and material of the original. Thermal double pane glass may be used. No opening shall be widened or narrowed.* For the proposed change of a window to a door on east elevation Marian Hall, staff finds that the criteria have been met and recommends **approval** of the exception.
3) **14-5.2(D)(5)(a)(iii)** *No existing openings shall be closed.* For the proposed closing of two windows on Marian Hall's east elevation, staff finds that the criteria have not been met and recommends **denial** of the exception.

Staff recommend approval of the other elements of the application that do not require exceptions as they comply with 14-5.2(D) General Design Standards for all Historic Districts, and 14-5.2(E) Downtown and Eastside Design Standards.

Sample motions:

a. Approve or deny the exception to **14-5.2(D)(2)(c)** for the proposed 92 sq. Ft. second/third floor addition to the existing stairwell on Marian Hall's east elevation, finding that the exception criteria have/have not been met,
b. Approve or deny the exception to **14-5.2(D)(5)(a)(i) f**or the proposed change of a window to a door on east elevation Marian Hall, finding that the exception criteria have/have not been met,
c. Approve or deny the exception to **14-5.2(D)(5)(a)(iii)** for the proposed closing of two windows on Marian Hall's east elevation, finding that the exception criteria have/have not been met, and
d. Approve or deny the elements of the project that do not require exception.

Should the Board deny the exception requests, the applicant shall return with an alternative proposal for review and approval prior to proceeding to building permit, or the Board may impose additional conditions of approval to ensure compliance with the Historic District overlay standards.

While no archaeological clearance is required for this request at Marian Hall, it may be required for subsequent development plans as only 2.9 acres of the 4.9 acres of the property currently have archaeological clearance.

BACKGROUND & SUMMARY:

Site Description

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 the 2008 approved retail and restaurant spaces (see figure 1). 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 three of the development plan. Phase 1 is complete and Phase 2 is incomplete.

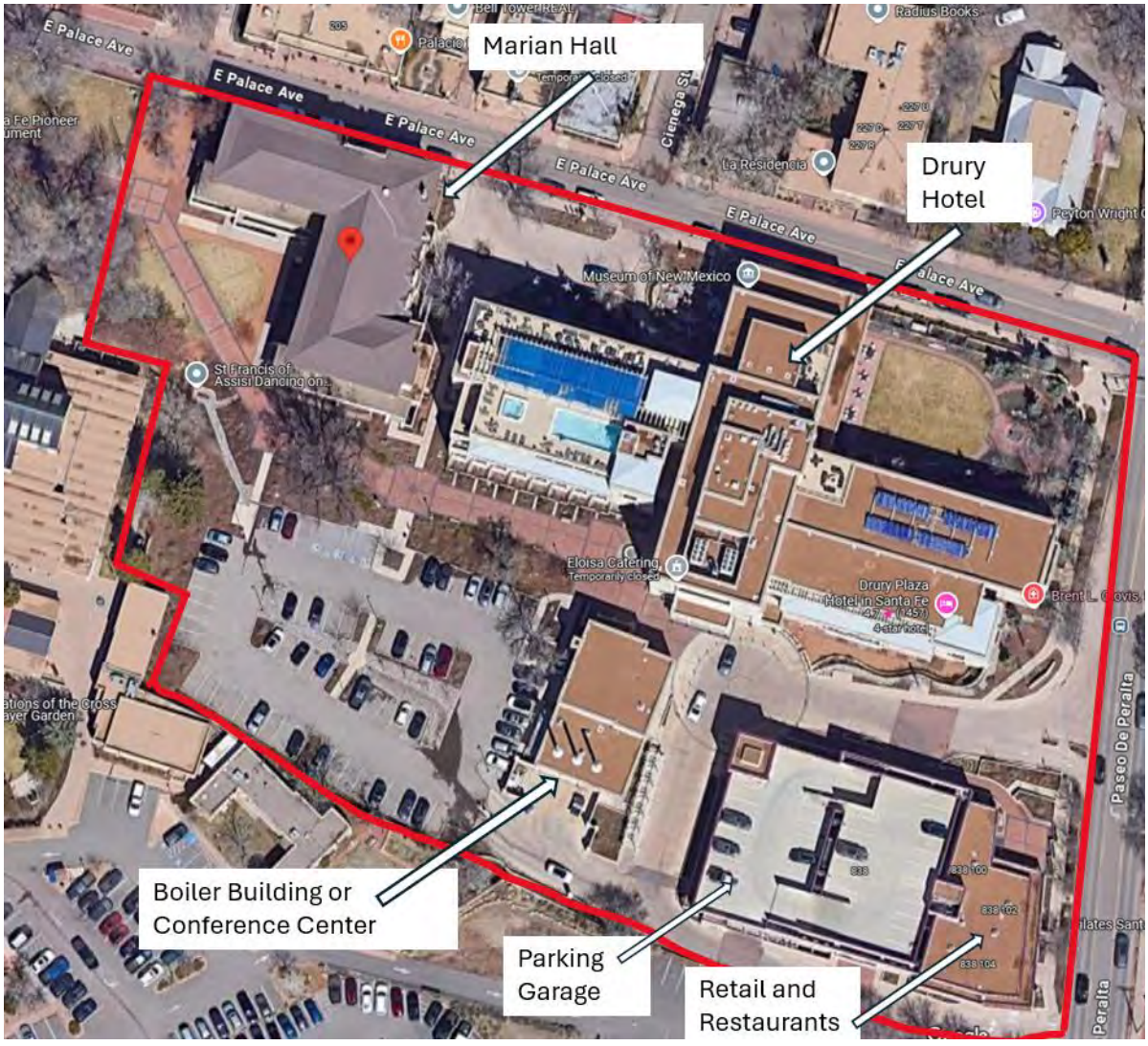


Figure 1: Drury Hotel Campus 2025.

Marian Hall

The original St. Vincent Sanitarium was constructed in 1882 and was founded by Archbishop John B. Lamy in the location that is now Marian Hall. The 1882 Sanitarium was destroyed by fire in 1896.

In 1907, Santa Fe began a capital campaign for a new hospital complex. The sanitarium was reconstructed at this time in a craftsman style by Isaac Hamilton Rapp for the Sisters of Charity. The rebuilt St. Vincent Sanitorium (Marian Hall) reopened in 1910 and according to the *New Mexican* it was "*One of the most modern and complete sanitariums in the country.*" The new sanitarium featured surgical facilities, electric lighting, steam heating system, running hot and cold water, and sleeping porches. Additionally, it had a reception area and lobby, dining room, library, billiard room, and the Sacred Heart Chapel.

In 1954, the sanatorium building was remodeled for the use as a convent and was then named Marian Hall in honor of the Marian Year proclaimed by Pope Pius XII in devotion to the Blessed Virgin Mary. The alterations to Marian Hall at this time included the removal of the original sleeping porches on the second and third floors.

In 1954, just a few years after the St. Vincent's hospital (now the Drury Hotel) was built, two corridor walkways were constructed to connect the new hospital to Marian Hall (see Figure 2). 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 have met the current standards of the Historic District overlay, but were emblematic of the mid-century modern style John Gaw Meem was known for. The corridors obscured the important east elevation of Marian Hall which was established as significant in 2008.

In 1984, when the State of New Mexico to over the property, they moved offices into Marian Hall, removed all the historic windows, and installed replicated windows. During the State's tenure, the buildings were used as State offices, an assisted living facility, and an outpatient treatment center.



Figure 2: Aerial Photo 1969 showing previous connections between the Marian Hall (left, red roof) and the St Vincent Hospital (right).

In 2008 under case H-08-095, the Historic Districts Review Board designated Marian Hall significant to the Downtown and Eastside Historic District with all elevations considered as primary because the building retains most of its original integrity. As part of the remodel the Board approved the following alterations and improvements at Marian Hall; removal of non-historic materials, including the stucco finish, cladding on bay windows, the south elevation ADA ramp and handrails, the non-contributing addition to the southeast corner and replaced the shingle roof with a clay tile roof. The corridors built by John Gaw Meem, which connected the hospital to Marian Hall which were designated as non-contributing in the 2008 case and were approved for demolition. The corridors were subsequently demolished in 2011. The Board also approved the reconstruction of the multistory verandas and the west elevation solarium along the south and west elevations, utilizing historic documentation as a guide. The Board allowed the construction of a canopy in front of the east elevation entry door, designed to not attach to the east elevation, but to affect weather protection by overlapping with a restored overhang.

There were conditions to this approval including all of the historic elements on the Marian Hall building such as windows (including the divided light pattern and proportion of the windows) were to be duplicated; the verandas, balustrades and solarium were to be restored to their original historic appearance; any material that was being replaced, such as roofing material, were to be replaced in kind; and the nonhistorical elements proposed for removal included the southeast stairway. Further the conditions for Marian Hall included lighting, which were required to be shielded to meet the City's lighting ordinance; there were to be no visible rooftop appurtenances; and the existing rooftop appurtenances (such as air conditioning units) were not to be replaced if removed in the future. The signage on the Marian Hall building was to be brought back to the Board for review and approval. The new canopy to be constructed on the east elevation of Marian Hall was to be clear glass.

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.



Figure 3: Drury Hotel West Elevation Primary Facade and Marian Hall East Elevation 2025

Since its inception, Marian Hall has served the community as a sanitarium, convent, provisions distribution station for the needy, an overflow hotel, dormitory, assisted living facility, seminary, and government office building. The building has been vacant since the 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. They are now coming forward to request improvements to Marian Hall as phase III of their approved Development Plan to adaptively reuse the building as an extension of the Drury Hotel.

Hospital Building

The original St. Vincent's hospital structure (now the Drury Hotel) was constructed in 1952 by John Gaw Meem and was designed with brick in Territorial Revival style with the defining features being the brick coping, neoclassical details, balustrades, and decorative brick panels. The St. Vincent's hospital relocated to its current site off St. Michael's Drive in 1977. The building was used by the State during the late 1970s and early 1980s. The building remained unused after the State's departure.

Drury Hotel Redevelopment

The Drury Hotel purchased the property in 2001and in 2004, presented their development plan to the Historic Districts Review Board under case H-04-082. The development plan comprised three phases of development. The first phase was to remodel the existing hospital and boiler buildings

and to construct a retail building, and a garage building. The second phase was the construction of new hotel suite buildings. The third phase was the renovation of Marian Hall (see Figure 6). The development plan was approved through the Planning Commission and signed and filed in 2011.

In 2008 under case H-08-095, the hospital building was established as a contributing structure with the NW-N(1) N(3) NE-E(4) NE-N(5), E(6), S(9) and W (12) facades listed as primary (See Figure 4).

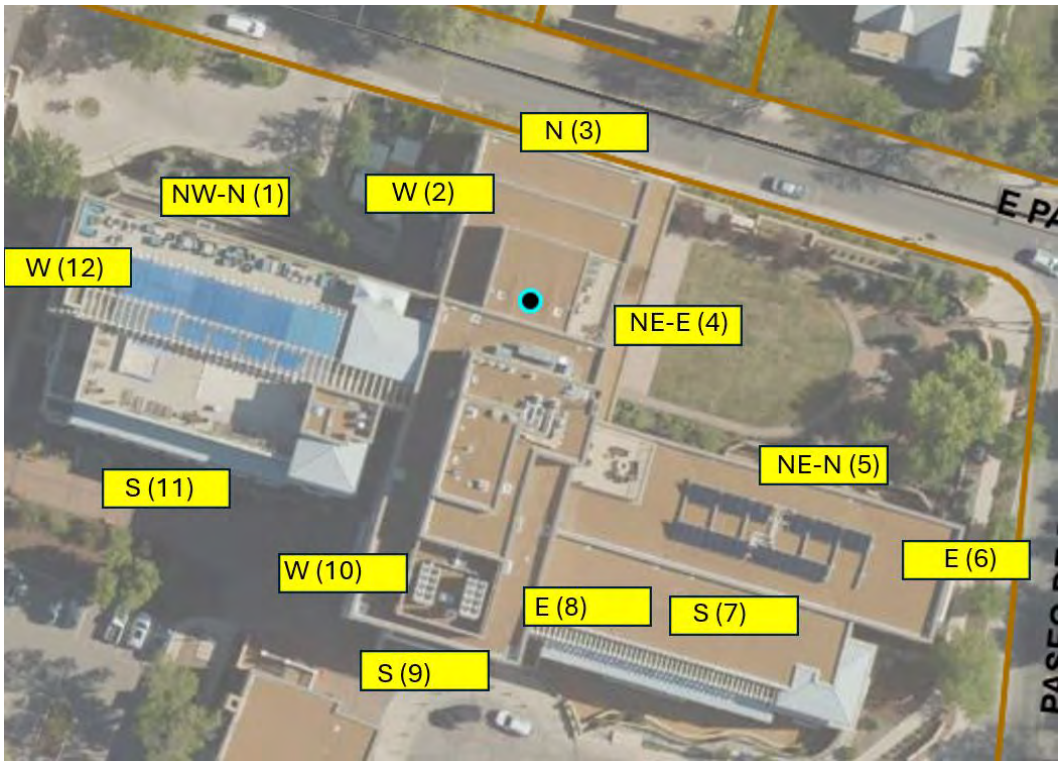


Figure 4: Drury Hotel Façade Map

The development plan included approval for construction of the parking garage, the three hotel room buildings (buildings 1, 2, and 3), and the retail shop building (see Figure 6). The remodel consisted of constructing a portal and canopy on façade nine (S) of the hospital building, creating new window openings and modifying window openings on facade nine (S), installing windows with single panes in excess of thirty inches on facades nine (S) and ten (W) of the hospital building, creating a new window opening on the north end of the east elevation of the Boiler Building; and increasing the height of the retail building. The approved demolition included the connecting hallways between the hospital building and Marian Hall, the mechanical gangway between the hospital building and the boiler room, and the maintenance buildings.

The conditions for the Hospital building included the windows for the new subgrade window openings on facade number five (NE-N) were to be reused from other existing windows from the building; the deck of the portal on facade number nine (S) was to be ten feet deep rather than twelve feet deep; the ceiling material of the second-level balcony was to be wood tongue and groove; and the trim was to be white; and the brick was to be a color approved by the Board. There

were conditions for the approvals of the other structures as well. Those conditions are not defined here as those buildings are not part of this application and some were not constructed.

As of 2025, the property consists of the Drury Hotel which was previously St Vincent's hospital, the boiler building which currently houses conference rooms, the parking garage and the structure facing Paseo de Peralta that was intended as a gallery but now houses retail and restaurant spaces. The area designated as Phase 2 of the Development Plan including hotel suites in the southwestern portion of the property have not been constructed and remain as surface parking for the hotel.

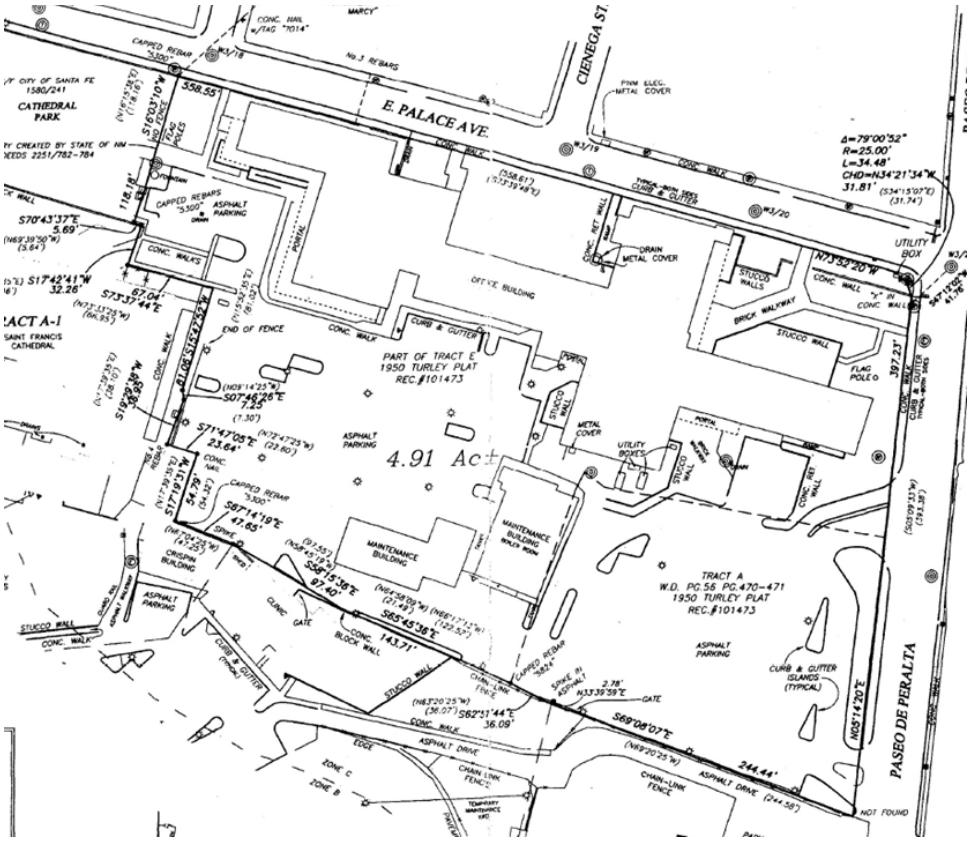


Figure 5: 2007 Plat showing buildings of the original St. Vincent Hospital campus

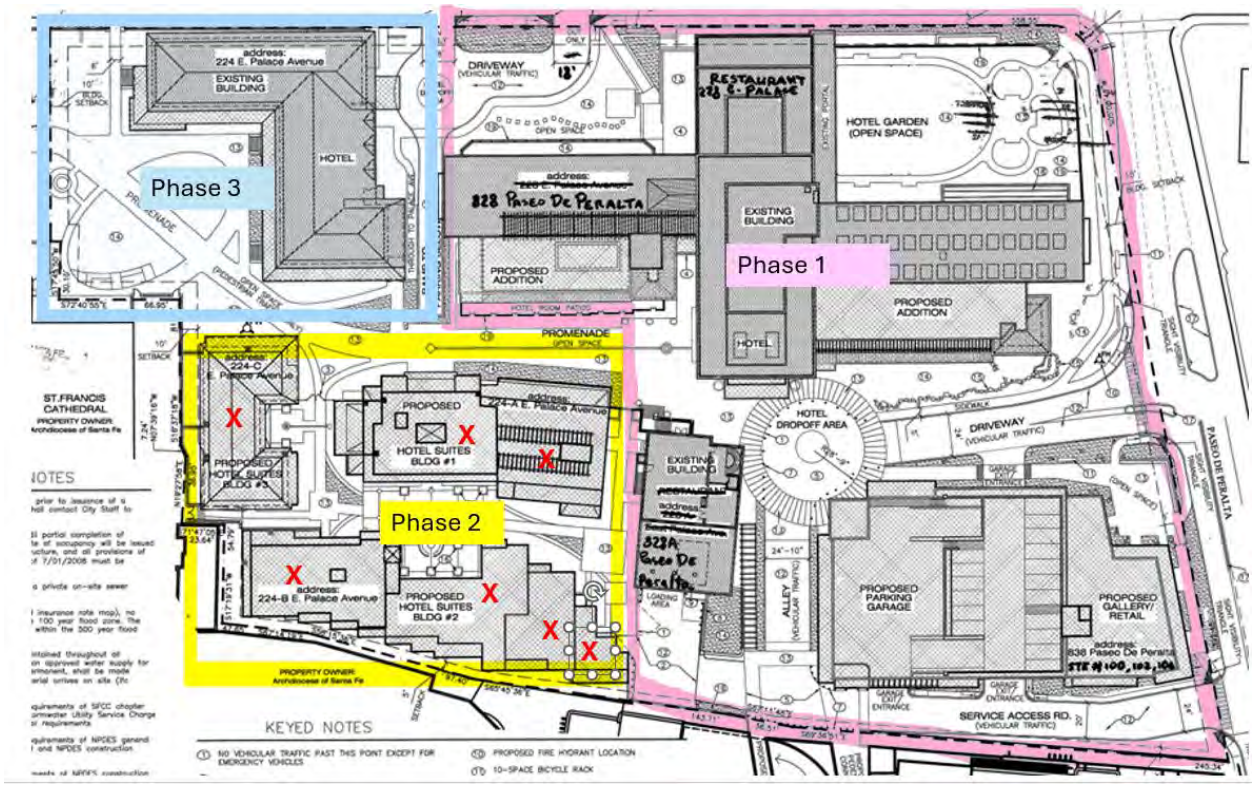


Figure 6: 2011 Development Plan showing buildings post approval in case H-08-095. The approved hotel suites in the southwestern portion of the property were not constructed and that area remains as parking for the hotel.

PREVIOUS CASE SUMMARIES:

The property for the Drury Hall and Marian Hall has had multiple approvals issued through the Historic District Review Board and Administratively as part of the redevelopment of the property for the Drury Hotel. The 2004 case was an informational session regarding the development plan. The 2008 case was discussed over a series of hearings and was the design for the first two phases of the development plan. Some structures that were approved have been completed though they are not necessarily used as planned in 2008, other structures and portions of remodels were not constructed or completed. This is intended as a short synopsis of each case and hearing.

HDRB:

H-03-048 Approved the extension of the brick walkway to the east from Cathedral Park. The existing concrete sidewalk on the west side of Marian Hall, was removed and replaced with a brick walkway to the Palace Avenue gate. The fence north from the Cathedral Park fence line was extended to match the heights and details and terminate in line with the parking lot. A fountain was installed in the brick walkway to reflect a historic fountain located on that site previously.

H-04-082 This case was an informational session and assignment of a subcommittee regarding the development plan for the property. While the review and approval was managed through the Current Planning Division, the HDRB reviewed the proposed architecture and changes to the site.

The development plan is in this packet under "224 and 228 East Palace Avenue Development Plan" for reference.

H-08-095 This case had several study sessions and hearings which spanned from 2008 through 2012. During the earlier hearings, on August 26, 2008, the status of the hospital, boiler building, and Marian Hall were established. Marian Hall was designated as significant with all elevations to be considered primary. The Hospital building was designated contributing had primary facades designated. However, the primary elevations for the Drury Hotel were redacted and reconsidered on May 26, 2009. The connections between the hospital and Marian Hall were designated non-contributing. The boiler building was designated as contributing with the concrete block portion as non-contributing.

There was further discussion regarding the primary facades of the hospital and on May 26, 2009 the designation of the primary facades was established as the facades; 1-NWN (this is the northwestern north façade or the north of the west wing), 3-N, 4-NEE, 5-NEN, 6-E, 9-S, and 12-W finding that all of these facades meet the definition in the ordinance as cited in 14-12.1 and that they all have character defining features and the elevations all embody all of the character defining architectural details that call for a primary facade.

On May 26, 2009, there was a discussion regarding the heights of the new buildings and approval for a height of 36' for the detached garage and 27' for the retail building was granted.

On June 30, 2009, the retail space, gallery, and garage heights were approved. The final decision was for the heights to be at the garage area, from 22'- 8" not to exceed 29'-6", and at the retail area from 16'- 9" to 20'- 9". This hearing also addressed openings and glazing on the hospital building (Drury Hotel). The addition on elevation number nine (south), specifically the portal and canopy, the 30" glazing on elevation nine (south), the glazing openings on elevation nine (south) except for the narrow window, the 30" rule exception on elevation ten (west), and the boiler building openings were approved and the elongated windows on the west were postponed for a redesign as discussed. This hearing also discussed and approved the arches on the new building number two, and regarding the new building three, a pitch roof was approved.

On July 22, 2009, the Board approved improvements for both Marian Hall and the hospital (Drury Hotel). At Marian Hall these improvements included the removal of non-historic material, including the stucco finish, cladding on bay windows, the south elevation ADA ramp and handrails, the non-contributing addition to the southeast corner and replace the shingle roof with a clay tile roof. The Board also approved reconstructing the multistory verandas and the west elevation solarium along the south and west elevations by using historic documentation as a guide and constructing a canopy in front of the east elevation entry door, which was designed not to attach to the east elevation, but to affect weather protection by overlapping with a restored overhang. The connecting hallways from Marian Hall to the hospital were approved to be demolished. The findings of fact and conclusions of law reads, "*As to Marian Hall, all historic elements on this building such as windows (including the divided light pattern and proportion of the windows) will be duplicated; the verandas, balustrades and solarium will be restored to their original historic appearance; any material that is being replaced, such as roofing material, will be replaced in kind; the non-historic elements proposed for removal by the applicant will be removed; the southeast stairway will be removed; the signage on the building will be brought back*

to the Board for review and approval; the lighting will be downlighting and meet the City's lighting ordinance; there will be no visible rooftop appurtenances; and existing rooftop appurtenances (such as air conditioning units) will not be replaced if removed in the future." The verandas and solarium were not reconstructed.



Figure 7: Verandas and Solarium in the 1950s image are not on the 2025 structure.

On September 1, 2009, the Board clarified the actions taken for the garage and gallery building and the Board approved the remodel of the gallery building. This structure is currently used for retail and restaurant space.

At the hearing on October 6, 2009, the Board approved the installation of yard walls, fences, exterior lighting, and signs for the Drury Hotel and signs for Marian Hall.

Finally, at the June 12, 2012, hearing the Board approved the stairwell overrun on the hospital roof, and to replace historic windows at the St. Vincents Hospital building (Drury Hotel).

Administrative approval 2.24.2012 Approved the demolition of the non-contributing gangway between the Hospital Building and the Boiler Building, as well as the demolition of half of the portal on the southeast corner and the stairwell on the northeast corner of the hospital building, and the demolition of the CMU shed and the maintenance buildings on the west of the boiler plant.

Administrative approval 4.4.2013 Approved eight changes to the HDRB approval for the Drury Hotel under case H-08-095B.

1. The west facing, fifth floor door, allowed replacement of the 6-lite door and transom with a window matching adjacent windows.
2. The north Facing, fifth floor equipment access louver/panel was allowed replacement with a window in the same location and with the same opening dimensions.

3.& 4. The east facing window and door were approved for the existing east facing, center window to stay a window. Instead, replace the east facing, left of the center window with a door.

5. The east facing door (2) was approved to be a 6-lite, single door with transom.
6. The second floor, east facing portal at the northernmost, east facing portal window was approved to be replaced with a 3-lite door and transom.
7. The parapet extension and elevator override were approved to allow for the override requirement of the specified elevator

8. Entrance canopy sconces were approved.

Administrative approval 10.20.2013 The Marian Hall roof was approved replacing asphalt shingles in-kind using Owens Corning true definition shingle in color "teak".

Administrative approval 1.2.2015 Approved a minor amendment to HDRB approval for the wedding garden walls and fence detail, west wing south patio fence, boiler building stairway, lights on posts and sconces.

Administrative approval 2.5.2015 Approved installation of bronze colored metal handrails on old boiler building.

Archaeological clearance was issued under case AR-15-09 for a Reconnaissance Report and Treatment Plan for 2.9 acres on the southwest corner of Paseo de Peralta and Palace Avenue and case AR-09-2011 for an Amended Treatment Plan for 228 E. Palace Avenue.

APPLICANT'S REQUEST:

The applicant proposes the following exterior alterations:

1) Reconstruct a 275 sq. ft. portion of the walkway that was 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. Per section 14-5.2(D)(5)(b) "… *Replacement or duplication of missing features shall be substantiated by documentation, physical or pictorial evidence."* The proposed walkway mimics the original design from John Gaw Meem and will connect in the same location on each of the two structures as the original walkway.





Figure 8: Location of planned walkway at the Drury Hotel (left) and Marian Hall (right)

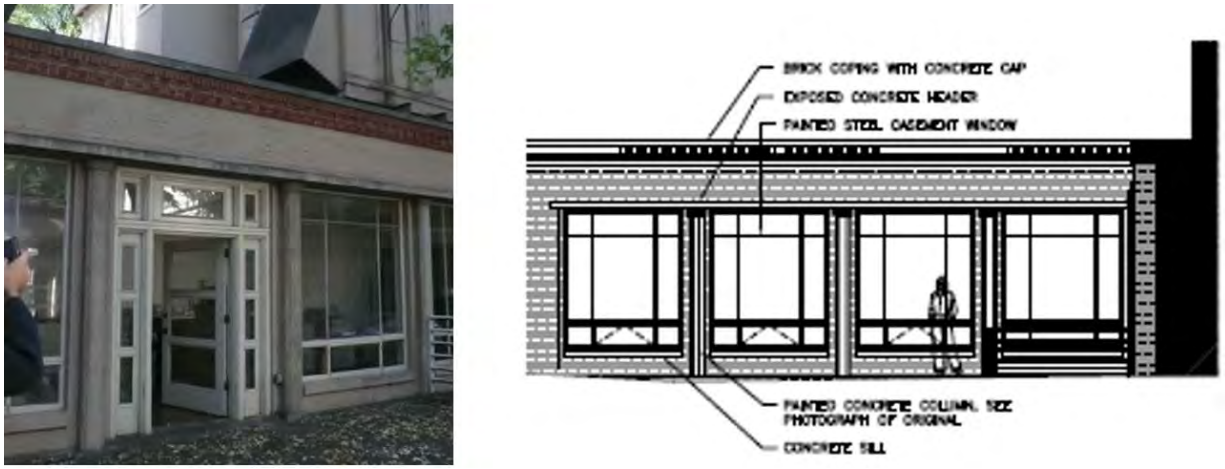


Figure 9: The walkway designed by John Gaw Meem that was demolished in 2011 and the 2025 proposed walkway.

2) Construct a 92 sq. ft. addition on the second and third floors of the east elevation to create a stairwell for egress.
3) Infill two windows on the east elevation of Marian Hall. An exception is requested to 14-5.2(D)(5)(a)(iii) for removal of openings on a primary façade.
4) Replace a window with a door on the east elevation of Marian Hall. An exception is requested to 14-5.2(D)(5)(a)(i) to alter the dimensions of a window to create a door on a primary façade.
5) Replace a window with a door on the west elevation of Marian Hall per section 14-5.2(D)(5)(b) "… *Replacement or duplication of missing features shall be substantiated by documentation, physical or pictorial evidence."* This opening shows a door in photos (see Figure 10).

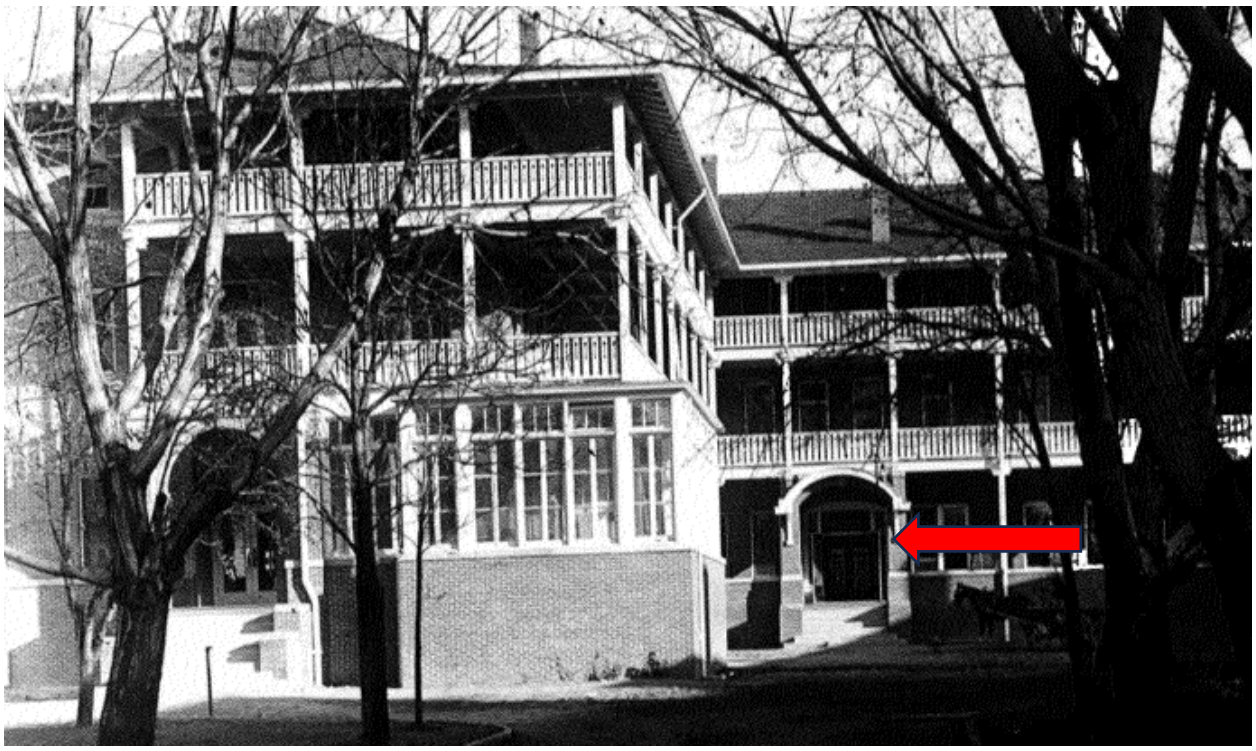


Figure 10: Photo circa 1950 showing the current window as a door

6) Replacing windows and doors in Marian Hall. The windows and doors requested 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 listed under 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 intent of reestablishing 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.

EXCEPTION CRITERIA AND RESPONSES:

The applicant has provided exception criteria for three items:

1) **14-5.2(D)(2)(c)** *Additions are not permitted to primary facades*. For the proposed 92 sq. Ft. second/third floor addition to the existing stairwell on Marian Hall's east elevation.
2) **14-5.2(D)(5)(a)(i)** *For all façades of significant, contributing and landmark structures, architectural features, finishes, and details other than doors and windows, shall be repaired rather than replaced. Historic windows that cannot be repaired or restored shall be duplicated in the size, style, and material of the original. Thermal double pane glass may be used. No opening shall be widened or narrowed.* For the proposed change of a window to a door on east elevation.
3) **14-5.2(D)(5)(a)(iii)** *No existing openings shall be closed.* For the proposed closing of two windows on Marian Hall's east elevation.

Exception to 14-5.2(D)(2)(c): *Additions are not permitted to primary facades*.

The applicant proposes constructing a 92 sq. Ft. second and third floor addition to the existing stairwell on Marian Hall's east elevation.

Criterion 1: Do not damage the character of the district.	**Criterion Met:** (Yes/No) **YES**

Applicant Response:

Allowing this exception does not damage the character of the district for these reasons:
The stairwell in question is not original to the building, as shown in 1951 photographs (Exhibit 4 attached below). The small addition to extend the stairwell is set back from the street and will be in harmony with the rest of the building. The scale of the addition (92 sf) is only a small fraction of the overall building footprint, roughly 10,000 square feet, and blends with the architecture of the building, retaining, and protecting the character of the district. Even though this portion of the façade is considered part of the primary façade, there are no character-defining features or any unique details in the design of this nonoriginal stairwell. Per the Secretary of the Interior's Standards and Guidelines for Rehabilitation, alterations and additions are allowed, so long as they do not remove any character-defining features or historic materials that characterize the property.

Staff Response: While the stairwell is not original, it is historic in its own right, is designated as significant, and altering **a** primary façade is not allowed. However, accommodation for current egress regulations is necessary in this case. This small addition to the east of the building will minimize the impact of public visibility and the impact on the district.

Criterion 2: **Prevent a hardship to the applicant or an injury to the public welfare.**	**Criterion Met:** (Yes/No) **YES**
Applicant Response: *Granting an exception to alter the façade by adding on to the existing stair well will prevent the following hardship. The existing stair does not provide egress from the 3rd floor and 2nd floors to an exit at ground level. It is a challenge to satisfy the current building code standards relating to egress and exits without affecting the footprint of the stairwell. Also, literal application of the design standards would create a hardship by denying the applicant the option to use the available building area to its full potential. Similar to above, adapting this building to a new use without any modifications to the exterior is hardly possible or practical. The hardship to the applicant is that not allowing the extension of the stairwell results in a significant loss of floor space/area at the ground level, making it unusable.* **Staff Response:** Egress regulations are a requirement for this adaptive reuse of Marian Hall. It would harm the public welfare and would not meet building code to not have an egress at this end of the hall.	
Criterion 3: **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.**	**Criterion Met:** (Yes/No) **YES**
Applicant Response: *Applying the design standards without an exception in this condition does not strengthen the unique heterogeneous character of the City as it denies the applicant a full range of design options, therefore limiting the outcome. Without this exception, it would be a challenge to upgrade the building to meet egress/code requirements, either prohibiting or limiting the use of the building. Allowing the exception would enable the applicant to move forward towards a successful reuse of a building, which is more than 100 years old, and have a positive impact on the residents of the Historic Districts. This exception will help make the building safer and it will contribute to the applicant's ability to make this project viable. See photo Exhibit 4 showing the original façade, which was altered in the 1950's.* **Staff Response:** The challenge is creating the egress at the stairs from the second floor to the ground level. This design option for access, which creates egress connection to the ground floor is required as other options such as internal access in the existing location is not viable.	

Exception to 14-5.2(D)(5)(a)(i): *For all façades of significant, contributing and landmark structures, architectural features, finishes, and details other than doors and windows, shall be repaired rather than replaced. Historic windows that cannot be repaired or restored shall be duplicated in the size, style, and material of the original. Thermal double pane glass may be used. No opening shall be widened or narrowed.* The applicant requests to change a window to a door on the east primary façade.	
Criterion 1: Do not damage the character of the district.	**Criterion Met:** (Yes/No) **YES**
Applicant Response: *This exception to allow changing a window to a door in a primary façade will not damage the character of the district because the proposed changes to the façade will not alter the overall character of the building, its style and detailing, or its impact on the district. The proposed new door will be in harmony with the style and size of the existing openings. Further, none of the window and door openings in this section of the façade are original, as seen in photographs taken in 1951(Exhibit 4). Changing this window to a door does not alter the character of the district, as it is located in a portion of the façade, which is concealed from public view by the larger Drury Hotel building. This section of Palace Avenue is characterized by the presence of these larger institutional buildings of different eras, and the proposed change does not take away from that or have any adverse effect on the architecture. This opening does not have any character-defining features or unique details and historic materials and changing it to a door will not destroy any character defining features of this façade.* **Staff Response:** Egress regulations do require an egress at this side of the structure. There is not currently one for this area. Replacing a single window with a door for egress is sensitive to the building and the location of the door will not be publicly visible. This impact on the district will be minimal.	
Criterion 2: **Prevent a hardship to the applicant or an injury to the public welfare.**	**Criterion Met:** (Yes/No) **YES**

Applicant Response: *Applying the design standards for existing and new openings in primary facades without an exception would create a hardship for the applicant because it would limit the range of design options, denying the applicant optimum use of the available building and interior space. Further, allowing this exception will prevent a hardship by making it possible for the applicant to adapt this old building to a new use. Successful adaptive reuse of this building would be impossible or impractical if there was no flexibility to make any changes to the building exterior. The proposed door is a code-required exit. The hardship to the applicant and the public is that not having a door to the exterior from the stairwell limits the use of the building by code and poses a health, safety and welfare concern.* **Staff Response:** Egress is required and these regulations by design are meant to prevent injury to the public welfare.	
Criterion 3: **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.**	**Criterion Met:** (Yes/No) **YES**
Applicant Response: *Allowing this exception strengthens the unique heterogeneous character of the City in several ways. Changing this window to a door allows the opportunity to offer a design solution that is centered around authenticity, rather than a "false façade" approach. It allows for an adaptive reuse of this building that respects its history and also does not try to hide its evolution over time. These necessary changes to the façade will contribute to a successful adaptive reuse of a vacant building, which has been the subject of vandalism. Bringing this building back to life will have a positive impact on the residents of the Historic Districts. The proposed door is a code-required exit.* **Staff Response:** Replacing a single window with a door for egress is sensitive to the building and the location of the door will not be publicly visible. This impact on the district will be minimal and minimizes impact on the significant structure.	

Exception to 14-5.2(D)(5)(a)(iii): *No existing openings shall be closed.* The applicant proposes to infill two windows on Marian Hall's east elevation.	
Criterion 1: Do not damage the character of the district.	**Criterion Met:** (Yes/No) **NO**
Applicant Response: *This exception to allow closing existing openings in a primary façade will not damage the character of the district because the proposed changes to the façade will not alter the overall character of the building, its style and detailing, or its impact on the district. Further, none of the window and door openings in this section of the façade are original, as seen in photographs taken in 1951(Exhibit 4). Removal and/or closing of these openings does not alter the character of the district, as they are located in a portion of the façade, which is concealed from public view by the larger Drury Hotel building. This section of Palace Avenue is characterized by the presence of these larger institutional buildings of different eras, and the proposed closing of openings does not take away from that or have 224 E. Palace Avenue – Marian Hall Rehabilitation & Adaptive Reuse, updated 04/14/2025 any adverse effect on the architecture. These openings do not have character-defining features or historic material and infilling them will not destroy any historic material or remove any features that characterize this façade.* **Staff Response:** While these windows are not visible from the streetscape, they are a part of a primary façade on a significant structure. They harmonize with the original structure and bring balance to the structure's layout. There are other designs that can be considered to prevent the infill of these windows. To make too many alterations on a primary façade will affect the status of the structure and ultimately damage the character of the district.	
Criterion 2: **Prevent a hardship to the applicant or an injury to the public welfare.**	**Criterion Met:** (Yes/No) **NO**

Applicant Response: *Applying the design standards for existing and new openings in primary facades without an exception would create a hardship for the applicant because it would limit the range of design options, denying the applicant optimum use of the available building and interior space. Further, allowing this exception will prevent a hardship by making it possible for the applicant to adapt this old building to a new use. Successful adaptive reuse of this building would be impossible or impractical if there was no flexibility to make any changes to the building exterior. Leaving the windows without infilling them creates a hardship to the applicant as it limits the use and layout of the interior space.*

Staff Response: Having windows on this façade does not cause hardships nor injury to public welfare. There are other design options that can provide privacy in a first-floor hotel room without enclosing these windows. If it is found to be necessary to close off the windows, the design option staff would prefer would be to fill the window on the interior only and leave the windows on the exterior of the structure. This is a planned hotel room. It is possible to leave the windows and use shutters, curtains, blinds, or other interior window treatments to prevent view into the room.

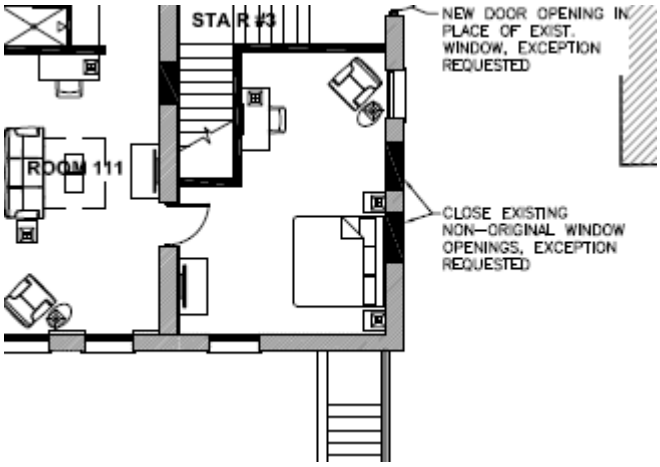


Figure 11: Section of the proposed first floor affected.

Criterion 3:	**Criterion Met:**
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.	(Yes/No) **NO**

Applicant Response: *Allowing this exception strengthens the unique heterogeneous character of the City in several ways. Changing the façade by closing some existing openings allows the opportunity to offer a design solution that is centered around authenticity, rather than a "false façade" approach. It allows for an adaptive reuse of this building that respects its history and also does not try to hide its evolution over time. These necessary changes to the façade will contribute to a successful adaptive reuse of a vacant building, which has been the subject of vandalism. Bringing this building back to life will have a positive impact on the residents of the Historic Districts. The windows in question are not original openings, as can be seen in photo Exhibit 4.*

Staff Response: While these windows are not visible from the streetscape, they are a part of a primary façade on a significant structure. They harmonize with the original structure and bring balance to the structure's layout. There are other designs that can be considered to prevent the infill of these windows such as closing the windows off from the interior without infilling them on the exterior. Also, this is a planned hotel room. It is possible to leave the windows and use shutters, curtains, blinds, or other interior window treatments to prevent viewing into the room.

APPLICANT'S EXHIBITS:



Exhibit 1. Historic connecting corridor photograph taken in 2008, showing the connection, designed by John Gaw Meem in built in 1954 and demolished in 2011.



Exhibit 2. Aerial Photograph, showing connecting corridor, 1969.


Exhibit 3. Marian Hall West Facade double-door entry, historic photo circa 1950



Exhibit 4. East Facade of Marian Hall, historic photograph, taken 1951

RELEVANT CODE CITATIONS:

14-5.2 HISTORIC DISTRICTS

(A) **General Provisions**

(1) General Purpose

In order to promote the economic, cultural, and general welfare of the people of the *city* and to ensure the harmonious, orderly and efficient growth and *development* of the *city* , it is deemed essential by the *governing body* that the qualities relating to the history of Santa Fe, and a harmonious outward appearance, which preserve *property* values and attract tourists and residents alike, be preserved, some of these qualities being:

(a) The continued existence and *preservation* of historical areas and *buildings*;

(b) The continued construction of *buildings* in the historic styles; and

(c) A general harmony as to style, form, color, height, proportion, texture and material between *buildings* of historic design and those of more modern design.

(C) **Regulation of Significant and Contributing Structures in the Historic Districts**

(Ord. No. 2004-26)

(1) Purpose and Intent

It is intended that:

(a) Each *structure* to be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical *development*, such as the addition of conjectural features or architectural elements from other *buildings*, shall not be undertaken;

(b) Changes to *structures* that have acquired historic *significance* in their own right shall be retained and preserved, recognizing that most *structures* change over time;

(c) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a *structure* be preserved; and

(d) New additions and related or adjacent new construction be undertaken in such a manner that if removed in the future, the original form and integrity of the historic *property* and its environment would be unimpaired.

(4) Compliance with General and Specific Design Standards Required

All *development* located within the historic districts and subject to this Section 14-5.2 shall comply with all applicable general *development* standards set forth in Subsection 14-5.2(D), as well as any applicable specific *development* standards set forth in Subsections 14-5.2(E) through (I).

(D) **General Design Standards for All H Districts**

In any review of proposed additions or alterations to *structures* that have been declared significant or contributing in any historic district or a *landmark* in any part of the *city*, the following standards shall be met:

(1) General

(a) The status of a significant, contributing, or *landmark structure* shall be retained and preserved. If a proposed alteration will cause a *structure* to lose its significant, contributing, or *landmark* status, the *application* shall be denied. The removal of historic materials or alteration of architectural features and spaces that embody the status shall be prohibited.

(b) If a proposed alteration or new construction will cause an adjacent *structure* to lose its significant, contributing, or *landmark* status, the *application* may be denied.

(2) Additions

(a) Additions shall have similar materials, architectural *treatments* and styles, features, and details as the existing *structure*, but shall not duplicate those of the existing *structure* in a manner that will make the addition indistinguishable from the existing *structure*.

(b) Additions to *buildings* that meet the standards of Subsection 14-5.2(E) shall continue to meet those standards set forth in Subsection 14-5.2(E) in addition to the standards set forth in this section.

(c) Additions are not permitted to *primary façades*.

(d) Additions are not permitted to the side of the existing footprint unless the addition is set back a minimum of ten (10) feet from the primary facade. The addition shall not exceed fifty percent of the square footage of the existing footprint, and shall not exceed fifty percent of the existing dimension of the primary facade. To the extent architecturally practicable, new additions shall be attached to any existing noncontributing portion of *structures* instead of attaching them to the significant or contributing portion.

(e) The height of additions:

(i) For significant and *landmark structures* shall be a minimum of six (6) inches less than the parapet or equivalent roof-feature of the existing adjacent connecting facade.

(ii) For contributing *structures* shall be no more than one additional *story* higher than the existing *structure*. To the extent architecturally practicable, two-story additions shall be set to the rear or the side rear of the *structure*. When an additional *story* is to be placed upon an existing contributing *structure*, that footprint may be no greater than fifty percent of the footprint of the existing *structure*, subject to the provisions of Subsection A(1) above. For the purposes of this paragraph, an additional *story* shall not exceed twelve (12) feet from the existing rooftop to the highest point of that *story*.

(5) Windows, Doors, and Other Architectural Features

(a) For all facades of significant and *landmark structures* and for the primary facades 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. Thermal double pane glass may be used. 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.

(iii) No existing opening shall be closed.

(b) For all façades of significant, contributing and *landmark structures*, architectural features, finishes, and details other than doors and windows, shall be repaired rather than replaced. In the event *replacement* is necessary, the use of new material may be approved. The new material shall match the material being replaced in composition, design, color, texture, and other visual qualities. *Replacement* or duplication of missing features shall be substantiated by documentation, physical or pictorial evidence.

(8) Archaeological Resources

Discovery of archaeological resources made during the historic districts review process shall be referred to the archaeological review committee.

(9) Height, Pitch, Scale, Massing and Floor Stepbacks

The height, pitch, *scale*, and massing of any *structure* in an historic district, as defined in this section, shall be limited as provided for in this section, unless further restricted within this chapter.

(a) Applicability

The following sections identify specific areas and specific *projects* subject to this section. Planning and land use department staff shall determine whether or not properties are included within this section. (Ord. No. 2007-45 § 30; Ord. #2020-22, § 16)

(e) Scale

The height of a proposed *building* or addition, its façade length, and its roof form and pitch shall appear to be in proportion to the height, façade length, and roof form and pitch of *buildings* in the applicable *streetscape*, or the *building* on which the addition is proposed.

(f) Massing and Floor Stepbacks

The Board may require that upper floor levels be stepped back, to carry out the intent of this section; provided that the board in making such determinations shall take into account whether the height of the proposed *building*, *yardwall*, fence, or proposed stepback of upper floor levels is in harmony with the massing of the applicable *streetscape* and *preservation* of the historic and characteristic visual qualities of the *streetscape*. The Board shall also require that the *publicly visible* façades of the *structure* be in conformance with Subsections 14-5.2(E) through (H), and in meeting those requirements, may require that different floor levels be stepped back.

(E) **Downtown and Eastside Design Standards**

The *governing body* recognizes that a style of architecture has evolved within the *city* from the year 1600 to the present characterized by construction with *adobe*, hereafter called "old Santa Fe style", and that another style has evolved, hereafter called "recent Santa Fe style", which is a *development* from, and an elaboration of the old Santa Fe style, with different materials and frequently with added decorations.

(1) Old Santa Fe Style

Old Santa Fe style, characterized by construction with *adobe*, is defined as including the so-called "pueblo" or "pueblo-Spanish" or "Spanish-Indian" and "territorial" styles and is more specifically described as follows:

(a) With rare exception, *buildings* are of one *story*, few have three stories, and the characteristic effect is that the *buildings* are long and low. Roofs are flat with a slight *slope* and surrounded on at least three sides by a firewall of the same color and material as the *walls* or of brick. Roofs are never carried out beyond the line of the *walls* except to cover an enclosed *portal* or *porch* formed by setting back a portion of the *wall* or to form an exterior *portal*, the outer edge of the roof being supported by wooden columns. Two- *story* construction is more common in the territorial than in other sub-styles, and is preferably accompanied by a balcony at

the level of the floor of the second *story*. Façades are flat, varied by inset *portales*, exterior *portales*, projecting vigas or roof beams, canales or water-spouts, flanking buttresses and wooden lintels, architraves and cornices, which, as well as doors, are frequently carved and the carving may be picked out with bright colors. Arches are almost never used except for nonfunctional arches, often slightly ogive, over gateways in freestanding *walls*;

(b) All exterior *walls* of a *building* are painted alike. The colors range from a light earth color to a dark earth color. The exception to this rule is the protected space under *portales*, or in church-derived designs, inset panels in a *wall* under the roof, in which case the roof overhangs the panel. These spaces may be painted white or a contrasting color, or have mural decorations;

(c) Solid *wall* space is always greater in any façade than window and door space combined. Single panes of glass larger than thirty (30) inches in any dimension are not permissible except as otherwise provided in this section;

(d) The rule as to flat roofs shall not be construed to prevent the construction of skylights or installation of air conditioning devices, or any other necessary roof *structures*, but such *structures* other than chimneys, flues, vents and aerials, shall be so placed as to be concealed by the firewall from the view of anyone standing in the *street* on which the *building* fronts;

(e) True old Santa Fe style *buildings* are made of *adobe* with mud plaster finish. Construction with masonry blocks, bricks, or other materials with which the *adobe* effect can be simulated is permissible; provided, that the exterior *walls* are not less than eight (8) inches thick and that geometrically straight façade lines are avoided. Mud plaster or hard plaster simulating *adobe*, laid on smoothly, is required; and

(f) It is characteristic of old Santa Fe style commercial *buildings* to place a *portal* so that it covers the entire sidewalk, the columns being set at the curb line.

(2) Recent Santa Fe Style

Recent Santa Fe style intends to achieve harmony with historic *buildings* by *retention* of a similarity of materials, color, proportion, and general detail. The dominating effect is to be that of *adobe* construction, prescribed as follows:

(a) No *building* shall be over two stories in height in any façade unless the façade shall include projecting or recessed *portales*, *setbacks* or other design elements;

(b) The combined door and window area in any *publicly visible* façade shall not exceed forty percent of the total area of the façade except for doors or windows located under a *portal*. No door or window in a *publicly visible* façade shall be located nearer than three (3) feet from the corner of the façade;

(c) No cantilevers shall be permitted except over projecting vigas, beams, or wood corbels, or as part of the roof *treatment* described below;

(d) No less than eighty percent of the surface area of any *publicly visible* façade shall be *adobe* finish, or stucco simulating *adobe* finish. The balance of the *publicly visible* façade, except as above, may be of natural stone, wood, brick, tile, terra cotta, or other material, subject to approval as hereinafter provided for *building permits*;

(e) The *publicly visible* façade of any *building* and of any adjoining *walls* shall, except as otherwise provided, be of one color, which color shall simulate a light earth or dark earth color, matte or dull finish and of relatively smooth texture. Façade surfaces under *portales* may be of contrasting or complimentary colors. Windows, doors and *portals* on *publicly visible* portions of the *building* and *walls* shall be of one of the old Santa Fe styles; except that *buildings* with *portals* may have larger plate glass areas for windows under *portals* only. Deep window recesses are characteristic; and

(f) Flat roofs shall have not more than thirty (30) inches overhang.

Lani McCulley
Historic Preservation Division
City of Santa Fe
200 Lincoln Avenue, Santa Fe, NM

Re : Case # 2025-010093 HDRB, 224 and 228 E. Palace Avenue
Marian Hall Réhabilitation & Adaptive Re-use, HDRB Application

March 10, 2025

Dear Ms. McCulley,

We would like to thank the Board and HPD Staff for the informational hearing held on April 8th, 2025. The comments and feedback we received from the Board were taken into consideration and we have updated our proposal accordingly. The owner supports the Board's comments and wish to see the connecting corridor be recreated per its original details, as designed by John Gaw Meem.

Below, I have provided a brief history of the building and a description of the proposed exterior alterations, including a list of proposed finishes and materials.

224 East Palace Avenue, known as St. Vincent's Sanatorium and also Marian Hall, is a three-story building, constructed with brick around 1908 by Isaac Hamilton Rapp for the Sisters of Charity in the Craftsman style, with a gross area of 27,910 sf. The building originally functioned as a convent and a sanatorium with sleeping porches on the second and third floors. The 2nd and 3rd floor porches were removed at an unknown date, believed to be circa 1954. Two hallway connections and a stairwell were constructed on the east elevation when the new hospital was constructed in 1952. These hallway connections had a non-contributing status and were demolished in 2011, when the Drury Plaza Hotel began construction. All historic windows were removed and replicated windows were installed when the State of New Mexico moved offices into the building in 1984. The building retains much of its original integrity and it is architecturally and historically important. The building is listed as significant to the district and all elevations are considered to be primary.

The owner's proposal is to rehabilitate the building, taking an adaptive reuse approach to accommodate 39 hotel rooms, which will be operated by the existing Drury Hotel, adjacent to Marian Hall. Some of the primary interior spaces will be preserved, while secondary spaces will be reconfigured or adapted to fit this reuse. Most of the exterior facades will remain unchanged with few proposed alterations, necessary to adapt the building to its new use. The proposed hotel facility will be an addition to the existing Drury Hotel and not a standalone hotel. Part of the proposed alterations consists of re-establishing and recreating the connecting hallway between Marian Hall and the Drury Plaza Hotel building, to allow for the integration of this addition to the hotel. The building height, overall massing, roof pitch, roof finish, and wall finish will remain the same, except for proposed new colors for exterior wall paint, exterior trim paint, and new color for existing stucco finish. All existing windows (non-historic, dated 1984) will

be replaced in kind. Existing rooftop mechanical equipment, wall-mounted electrical conduit and non-historic flood light fixtures will be removed.

The Drury team recognizes the historic significance of this building and is dedicated to maintaining and preserving its historic fabric and integrity, while making some necessary alterations to adapt it to its new use.

Below is a list of all proposed exterior alterations for each façade:

North Façade

- New paint color for existing brick surface
- New paint color for existing wood/concrete/metal trim
- New color for existing stucco finish
- Selective repair or replacement in kind of wood outriggers at roof eaves, damaged by water/weather.
- Repair brick façade and repoint as needed.
- Replace all windows in kind with new insulated windows.
- Remove non-historic metal guardrail at exterior stair to basement
- Recreate connecting hallway per original design by John Gaw Meem, featuring steel casement windows with panes larger than 30", painted concrete columns with chamfered corners, painted brick walls with brick coping and concrete coping cap, as shown in historic photographs.

West Façade

- New paint color for existing brick surface
- New paint color for existing wood/concrete/metal trim
- New paint color for existing brick façade under porch to match porch trim color
- Selective Repair or replacement in kind of existing wood beams/columns of veranda porch and roof eave outriggers, damaged by water/weather.
- Repair brick façade and repoint as needed
- Replace all windows in kind with new insulated windows
- Repair or replace existing concrete stair to veranda
- Remove wall-mounted electrical conduit, flood lights, and rooftop equipment.
- New light fixtures at porch are to be determined and will be submitted for review
- Recreate a double door entrance with sidelights and transom, which was removed at an unknown date, believed to be in the 50's, with detailing per historic photographs
- Replace existing non-historic entry door with new

South Façade

- New paint color for existing brick surface
- New paint color for existing wood/concrete/metal trim
- New paint color for existing brick façade under porch to match porch trim color
- Selective repair or replacement in kind of wood outriggers at roof eaves, damaged by water/weather.
- Repair brick façade and repoint as needed.
- New light fixtures at porch are to be determined and will be submitted for review
- Replace all windows in kind with new insulated windows

- Recreate connecting hallway per original design by John Gaw Meem, featuring steel casement windows with panes larger than 30", a painted metal door, painted brick walls with brick coping and concrete coping cap, as shown in historic photographs.

East Façade (three exceptions requested)

- New paint color for existing brick surface
- New paint color for existing wood/concrete/metal trim
- Selective repair or replacement in kind of wood outriggers at roof eaves, damaged by water/weather.
- Repair brick façade and repoint as needed.
- Replace all windows in kind with new insulated windows
- Closing of two existing window openings– exception requested
- Changing existing window to a door – exception requested
- Addition/s to primary façade – proposed 92 sf addition to extend the length of existing stairwell (not original to building), exception requested

Drury Hotel West Façade

- Recreate connecting hallway per original design by John Gaw Meem, featuring steel casement windows with panes larger than 30", painted concrete columns with chamfered corners, painted brick walls with brick coping and concrete coping cap, as shown in historic photographs.
- Remove existing non-historic balcony and balustrade at 2nd floor (built in 2014)

The exterior finish and color selections are the following:

a. Existing brick facades – new paint, Sherwin Williams SW7704, Tower Tan
b. Brick facades under porches – new paint, Sherwin Williams SW6385, Dover White
c. Existing Wood/concrete/metal trim – new paint, Sherwin Williams SW6385, Dover White
d. Window frames – wood, painted Sherwin Williams SW6385, Dover White
e. Existing Stucco Finish and color to remain
f. Existing Shingle Roof to remain
g. Windows at Connecting Hallway Addition – Painted Steel casement, per historic photograph, matching remaining existing steel casement window.

New Light fixtures for the porches on the south and west facades have not been selected yet and will be submitted for review by the Board and/or HPD Staff.

We understand the building's significance, both architectural and historic, and we have studied it carefully, researched diligently, and considered many factors before making the decisions outlined in this proposal. Our decision to ask the Board for exceptions to the Design Standards was not taken lightly and we hope that you and the Board will find our responses satisfy and meet the Exception Criteria. The goal of our proposal is to rehabilitate and bring back to life a building, which has been vacant for decades and which stands as a significant symbol of Santa Fe's history. We plan to do so with a sensitive approach, maintaining and rehabilitating the work of Isaac Hamilton Rapp, and also taking the necessary steps to make the building viable for use in the 21st century.

I have attached the application form, along with all required supporting documentation, as listed below:

1. 224 E. Palace Avenue – HDRB Application
2. 224 E. Palace Avenue - HDRB Drawings – site plan, existing and proposed floor plans, existing and proposed exterior elevations
3. 224 E. Palace Avenue – Existing Photos Exhibit
4. 224 E. Palace Avenue – Historic Photos Exhibit
5. 224 E. Palace Avenue - Finish & Color Exhibit (virtual)
6. 224 E. Palace Avenue - Exception Criteria & Responses, updated 04/14/2025
7. 224 E. Palace Avenue – Preliminary Zoning Review

Thank you for your time and your consideration of this application. If you need any additional information, please let me know.

Best Regards,



Tiho Dimitrov, AIA
Dimitrov Design Studio LLC

Design Standards & Signage Exceptions

The requested exceptions to Design Standards are listed below:

1) 14-5.2(D)(2)(c) Addition to the second/third floor at stairwell east (primary) elevation
2) 14-5.2(D)(5)(b) changing a window to a door on east (primary) elevation Marian Hall
3) 14-5.2(D)(a)(iii) closing two windows on the east (primary) elevation Marian Hall

I.) Exception will not damage the character of the district.

1) Addition to the second/third floor at stairwell east elevation of Marian Hall

Allowing this exception does not damage the character of the district for these reasons: The stairwell in question is not original to the building, as shown in 1951 photographs (Exhibit 4 attached below). The small addition to extend the stairwell is set back from the street and will be in harmony with the rest of the building. The scale of the addition (92 sf) is only a small fraction of the overall building footprint, roughly 10,000 square feet, and blends with the architecture of the building, retaining, and protecting the character of the district. Even though this portion of the façade is considered part of the primary façade, there are no character-defining features or any unique details in the design of this non-original stairwell. Per the Secretary of the Interior's Standards and Guidelines for Rehabilitation, alterations and additions are allowed, so long as they do not remove any character-defining features or historic materials that characterize the property.

2) Changing a window to a door on east (primary) elevation of Marian Hall

This exception to allow changing a window to a door in a primary façade will not damage the character of the district because the proposed changes to the façade will not alter the overall character of the building, its style and detailing, or its impact on the district. The proposed new door will be in harmony with the style and size of the existing openings. Further, none of the window and door openings in this section of the façade are original, as seen in photographs taken in 1951(Exhibit 4). Changing this window to a door does not alter the character of the district, as it is located in a portion of the façade, which is concealed from public view by the larger Drury Hotel building. This section of Palace Avenue is characterized by the presence of these larger institutional buildings of different eras, and the proposed change does not take away from that or have any adverse effect on the architecture. This opening does not have any character-defining features or unique details and historic materials and changing it to a door will not destroy any character-defining features of this façade.

3) Closing two windows on the east (primary) elevation of Marian Hall

This exception to allow closing existing openings in a primary façade will not damage the character of the district because the proposed changes to the façade will not alter the overall character of the building, its style and detailing, or its impact on the district.. Further, none of the window and door openings in this section of the façade are original, as seen in photographs taken in 1951(Exhibit 4). Removal and/or closing of these openings does not alter the character of the district, as they are located in a portion of the façade, which is concealed from public view by the larger Drury Hotel building. This section of Palace Avenue is characterized by the presence of these larger institutional buildings of different eras, and the proposed closing of openings does not take away from that or have

any adverse effect on the architecture. These openings do not have character-defining features or historic material and infilling them will not destroy any historic material or remove any features that characterize this façade.

II.) Exception required to prevent a hardship to the applicant or an injury to the public welfare.

1) Addition to the second/third floor at stairwell east (primary) elevation of Marian Hall

Granting an exception to alter the façade by adding on to the existing stair well will prevent the following hardship. The existing stair does not provide egress from the 3rd floor and 2nd floors to an exit at ground level. It is a challenge to satisfy the current building code standards relating to egress and exits without affecting the footprint of the stairwell. Also, literal application of the design standards would create a hardship by denying the applicant the option to use the available building area to its full potential. Similar to above, adapting this building to a new use without any modifications to the exterior is hardly possible or practical. The hardship to the applicant is that not allowing the extension of the stairwell results in a significant loss of floor space/area at the ground level, making it unusable.

2) Changing a window to a door on east elevation of Marian Hall

Applying the design standards for existing and new openings in primary facades without an exception would create a hardship for the applicant because it would limit the range of design options, denying the applicant optimum use of the available building and interior space. Further, allowing this exception will prevent a hardship by making it possible for the applicant to adapt this old building to a new use. Successful adaptive reuse of this building would be impossible or impractical if there was no flexibility to make any changes to the building exterior. The proposed door is a code-required exit. The hardship to the applicant and the public is that not having a door to the exterior from the stairwell limits the use of the building by code and poses a health, safety and welfare concern.

3) Closing two windows on the east elevation of Marian Hall

Applying the design standards for existing and new openings in primary facades without an exception would create a hardship for the applicant because it would limit the range of design options, denying the applicant optimum use of the available building and interior space. Further, allowing this exception will prevent a hardship by making it possible for the applicant to adapt this old building to a new use. Successful adaptive reuse of this building would be impossible or impractical if there was no flexibility to make any changes to the building exterior. Leaving the windows without infilling them creates a hardship to the applicant as it limits the use and layout of the interior space.

III.) Exception will 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.

1) Addition to the second/third floor at stairwell east elevation of Marian Hall

Applying the design standards without an exception in this condition does not strengthen the unique heterogeneous character of the City as it denies the applicant a full range of design options, therefore limiting the outcome. Without this exception, it would be a challenge to upgrade the building to meet egress/code requirements, either prohibiting or limiting the use of the building. Allowing the exception would enable the applicant to move forward towards a successful reuse of a building, which is more than 100 years old, and have a positive impact on the residents of the Historic Districts. This exception will help make the building safer and it will contribute to the applicant's ability to make this project viable. See photo Exhibit 4 showing the original façade, which was altered in the 1950's.

2) Changing a window to a door on east elevation of Marian Hall

Allowing this exception strengthens the unique heterogeneous character of the City in several ways. Changing this window to a door allows the opportunity to offer a design solution that is centered around authenticity, rather than a "false façade" approach. It allows for an adaptive reuse of this building that respects its history and also does not try to hide its evolution over time. These necessary changes to the façade will contribute to a successful adaptive reuse of a vacant building, which has been the subject of vandalism. Bringing this building back to life will have a positive impact on the residents of the Historic Districts. The proposed door is a code-required exit.

3) Closing two windows on the east (primary) elevation of Marian Hall

Allowing this exception strengthens the unique heterogeneous character of the City in several ways. Changing the façade by closing some existing openings allows the opportunity to offer a design solution that is centered around authenticity, rather than a "false façade" approach. It allows for an adaptive reuse of this building that respects its history and also does not try to hide its evolution over time. These necessary changes to the façade will contribute to a successful adaptive reuse of a vacant building, which has been the subject of vandalism. Bringing this building back to life will have a positive impact on the residents of the Historic Districts. The windows in question are not original openings, as can be seen in photo Exhibit 4.

Additional information and references of these buildings can be found in HDRB case #08-095B.



Exhibit 1. Historic connecting corridor photograph taken in 2008, showing the connection, designed by John Gaw Meem in built in 1954 and demolished in 2011.



Exhibit 2. Aerial Photograph, showing connecting corridor, 1969.



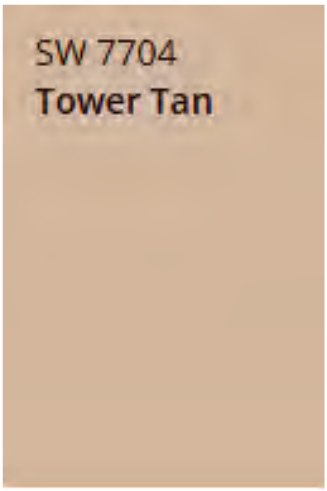
Exhibit 3. Marian Hall West Facade double-door entry, historic photo circa 1950



Exhibit 4. East Facade of Marian Hall, historic photograph, taken 1951

224 E. Palace Avenue
Marian Hall Rehabilitation & Adaptive Reuse
Color Selections · March 2025

Marian Hall	**Material / Color**
Wall Surface (Primary)	Existing Brick - Paint SW7704 Tower Tan
Wall Surface (Secondary)	Existing Stucco / Existing Color to remain
Trim (Primary)	Wood / Paint SW6385 Dover White
Roof Material	Shingles (Existing color to remain)



Exterior Wall Paint

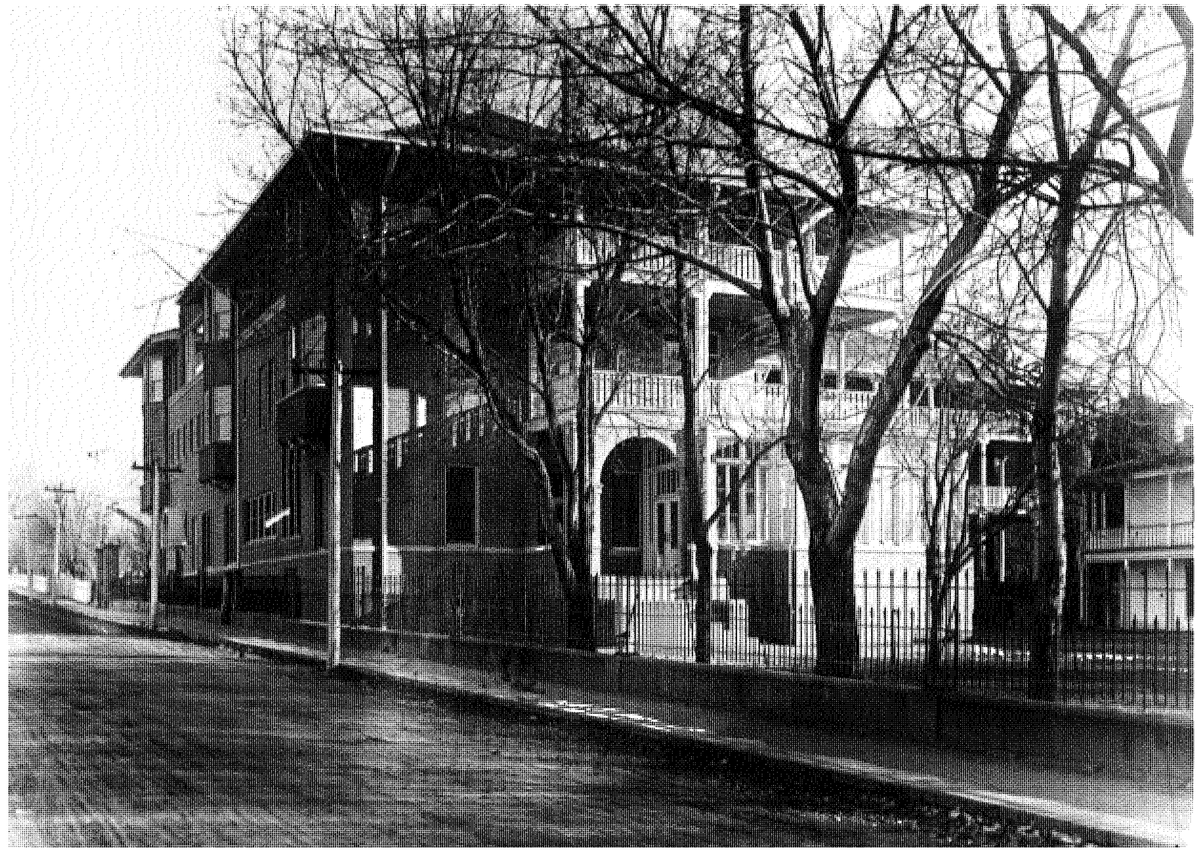


Exterior Trim & Window Frame Paint

*Paint colors may be modified based on original colors used as determined by sample analysis. Any proposed modifications to these selections will be presented to staff for administrative approval or brought back to the HDRB.



NORTH FACADE, CIRCA 1915



NORTHWEST CORNER, CIRCA 1910



WEST FACADE, CIRCA 1950



EAST FACADE, 1951



CONNECTING HALLWAY, 2008

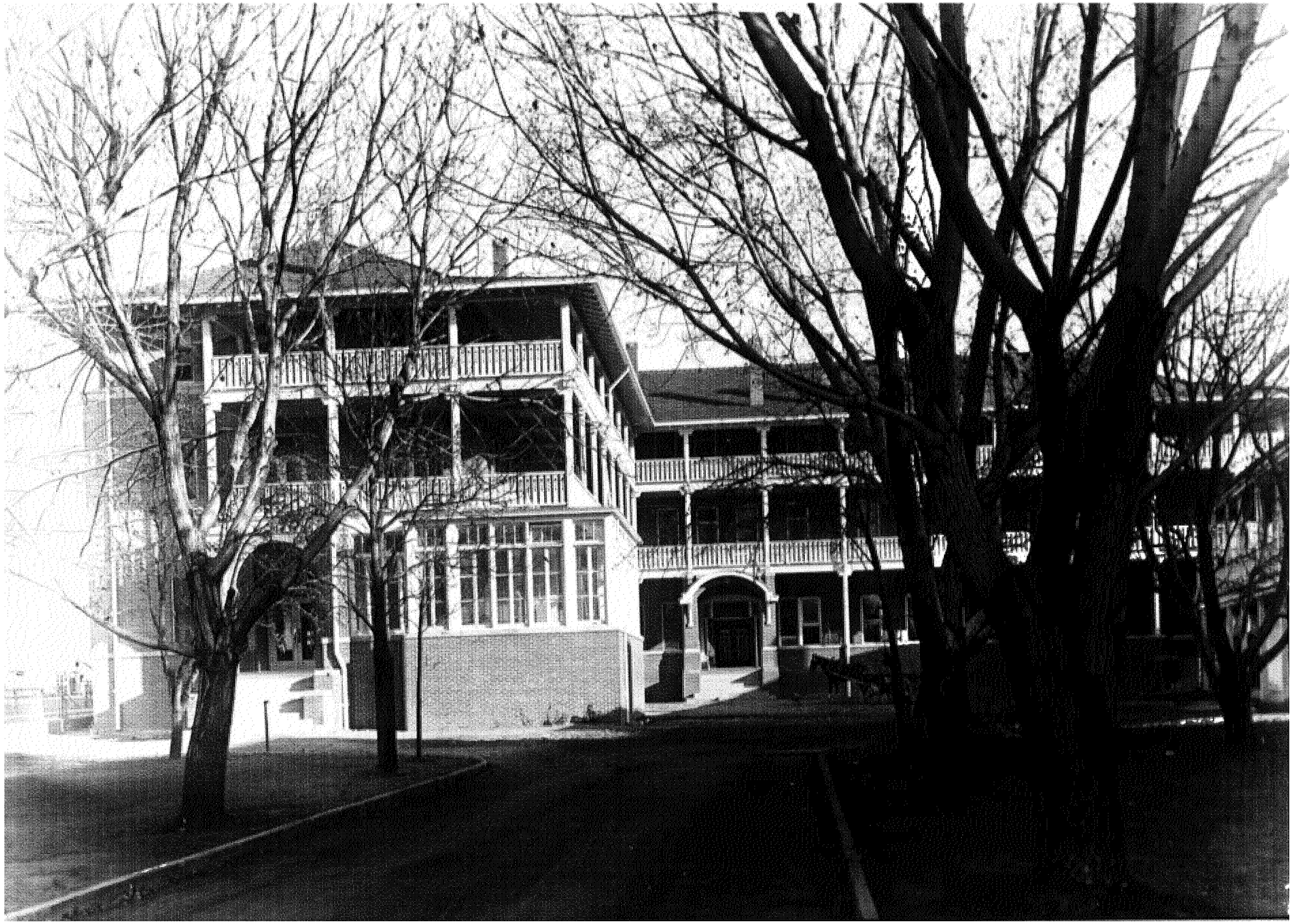


AERIAL PHOTO SHOWING CONNECTING HALLWAY, 1958

224 E. PALACE AVENUE - MARIAN HALL
REHABILITATION & ADAPTIVE REUSE

CASE # 2025-010093 HDRB

HDRB REVIEW DRAWINGS, ISSUED 04/14/2025



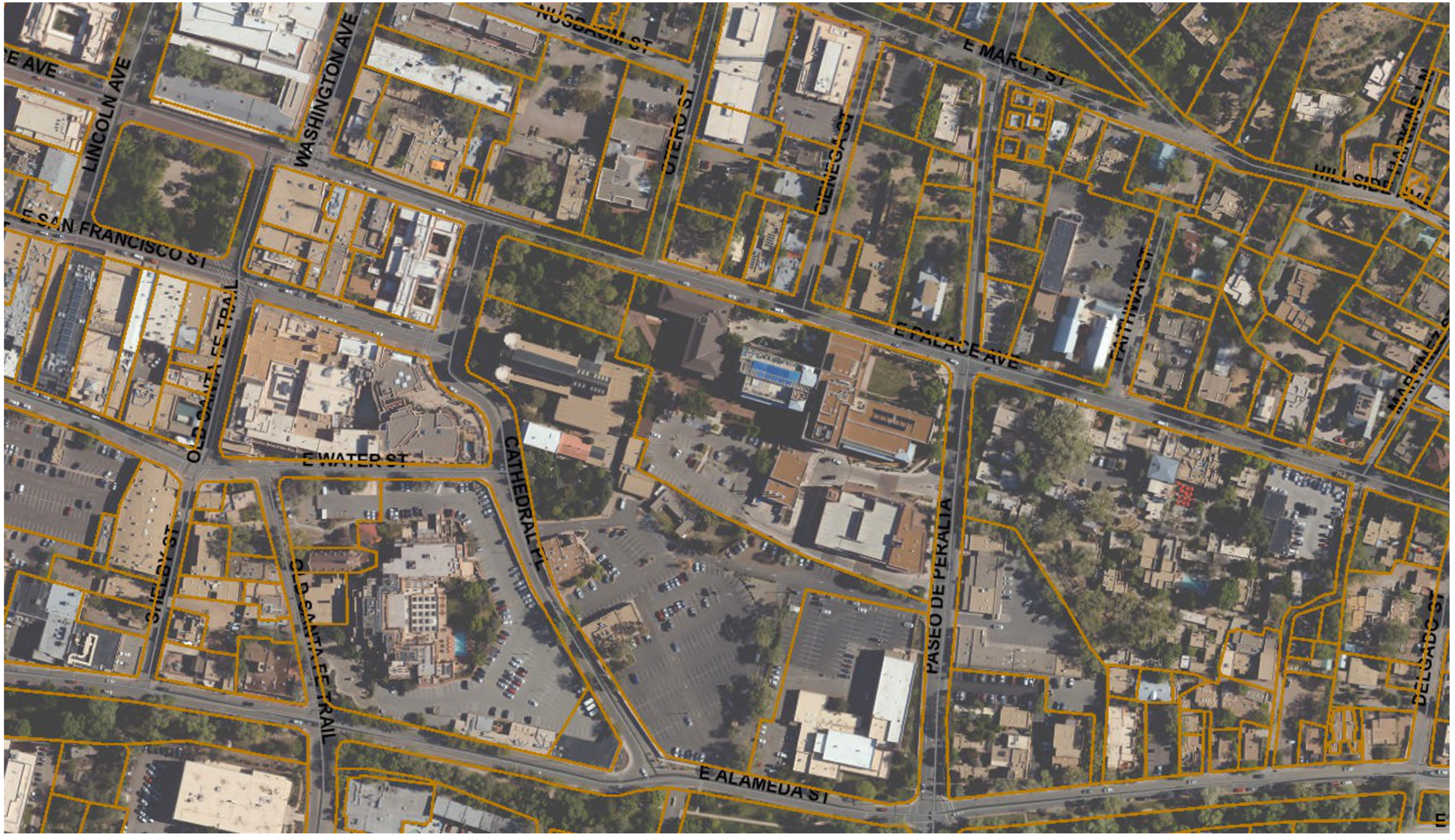
DRURY PLAZA

DIMITROVDESIGNSTUDIO LLC

AERIAL PHOTO, 1969

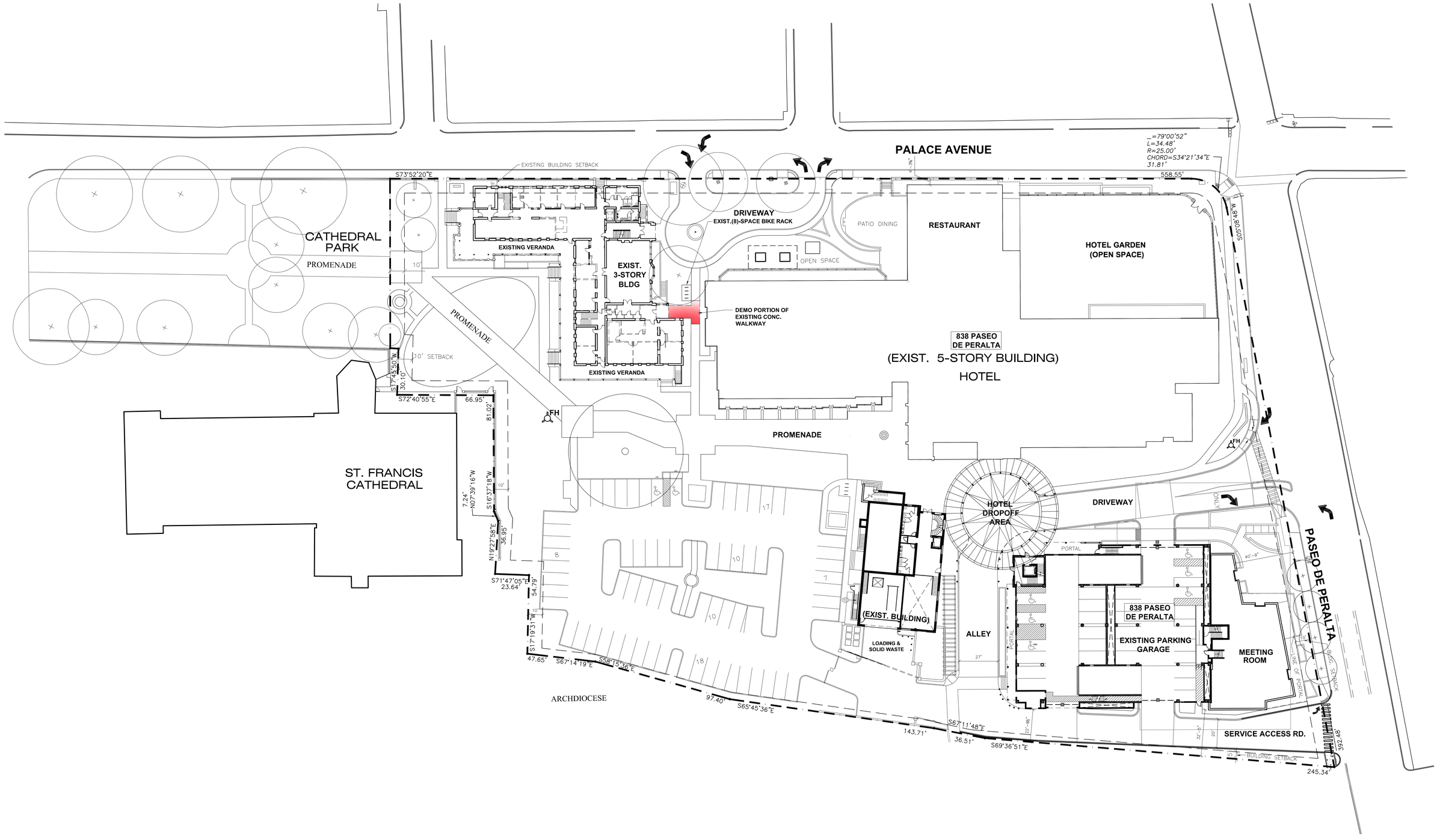


VICINITY MAP-AERIAL PHOTO, 2019



DRURY PLAZA

DIMITROVDESIGNSTUDIO LLC



DRURY PLAZA

EXISTING & DEMOLITION SITE PLAN

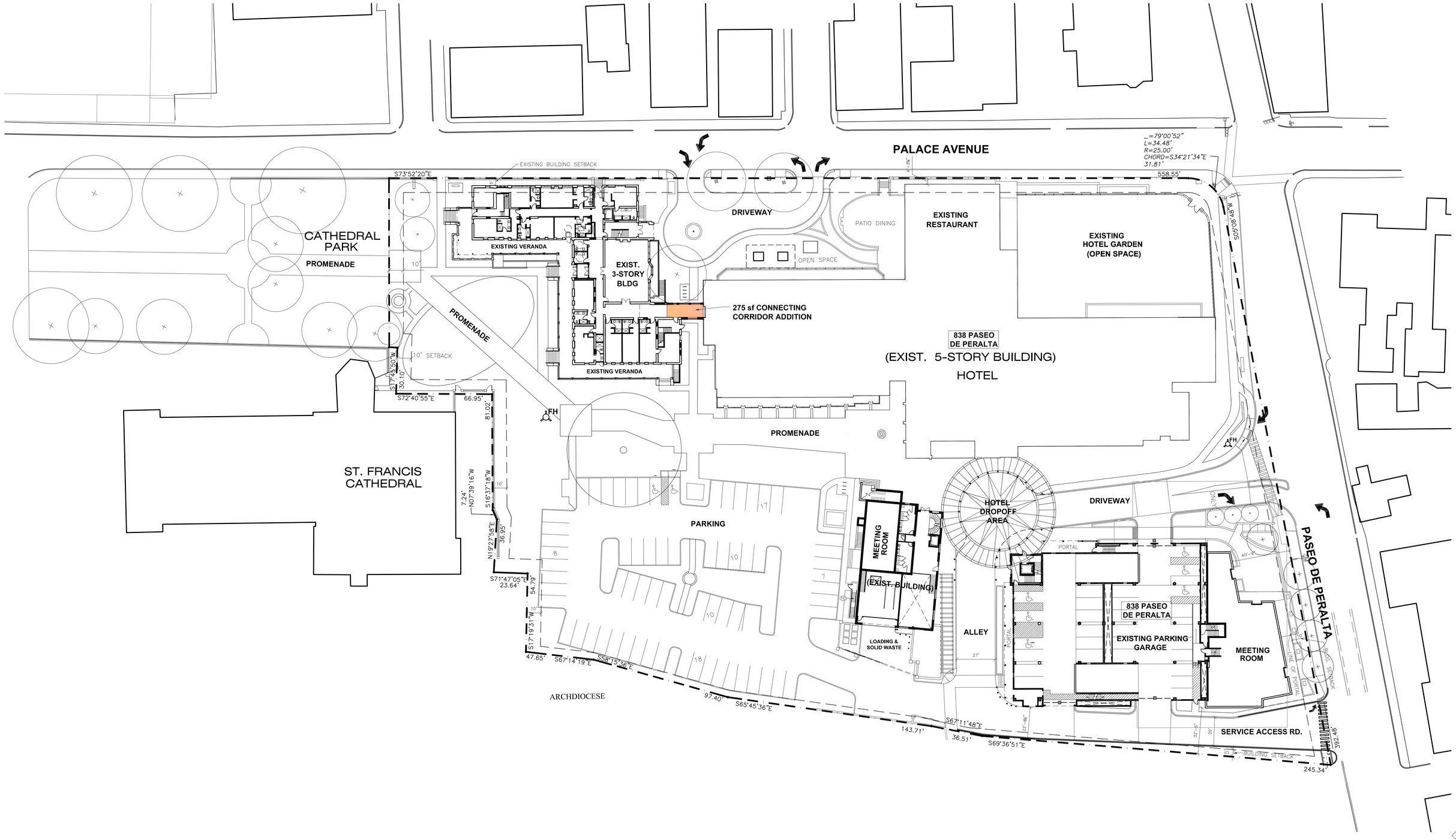
0 15' 30' 60' 120'

SCALE: 1" = 30'-0"

03/10/2025

DIMITROVDESIGNSTUDIO LLC

A0.1



DRURY PLAZA

PROPOSED SITE PLAN

0 15' 30' 60' 120'

SCALE: 1" = 30'-0"

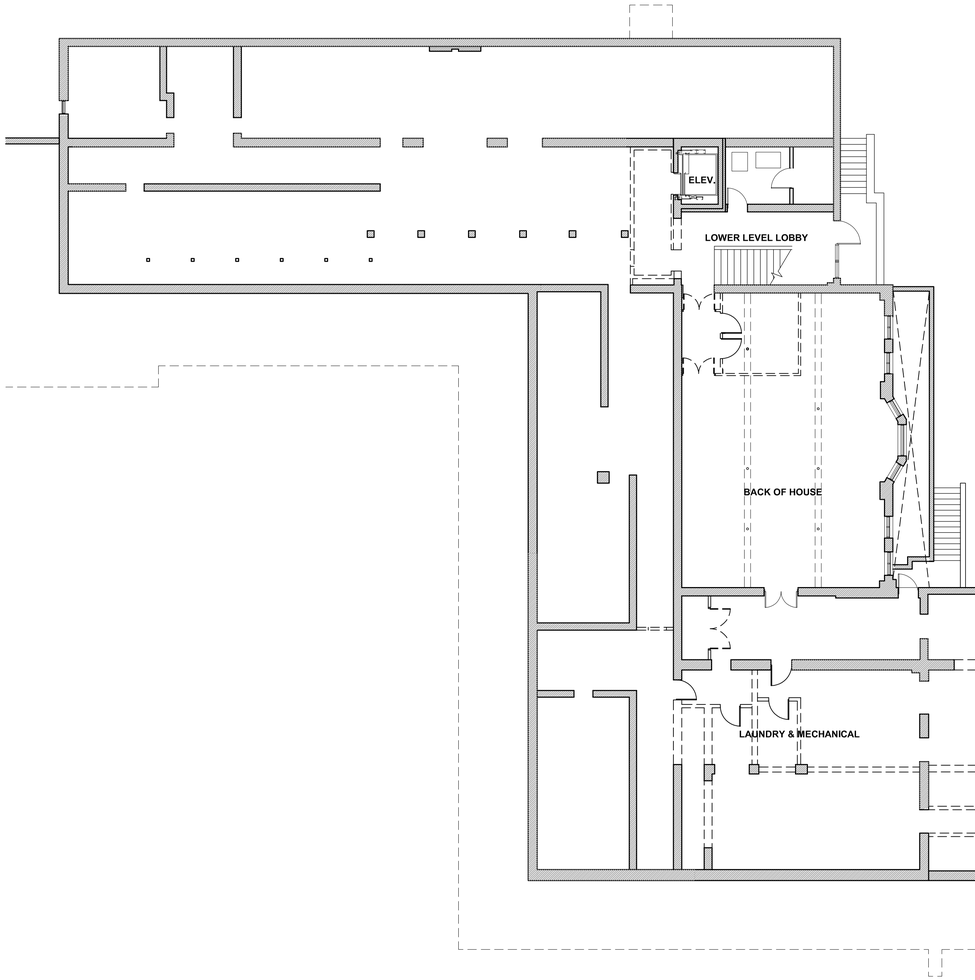
03/10/2025

DIMITROVDESIGNSTUDIO LLC

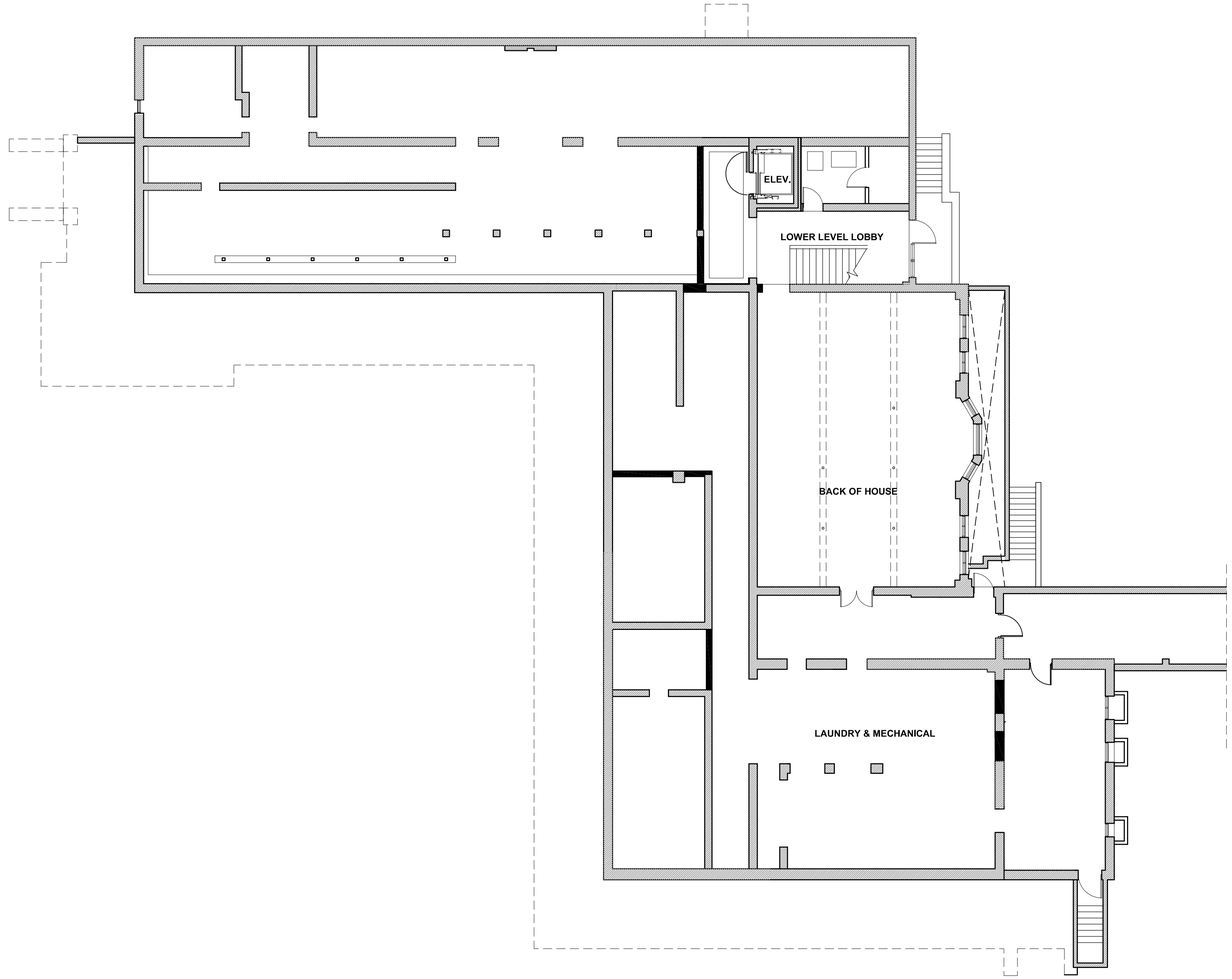
A0.2

LEGEND

- WALLS TO BE DEMOLISHED
- EXISTING WOOD FRAME WALLS
- EXISTING MASONRY WALLS
- NEW WALLS
- PROPOSED ADDITION AREA



EXISTING BASEMENT FLOOR PLAN



PROPOSED BASEMENT FLOOR PLAN

DRURY PLAZA

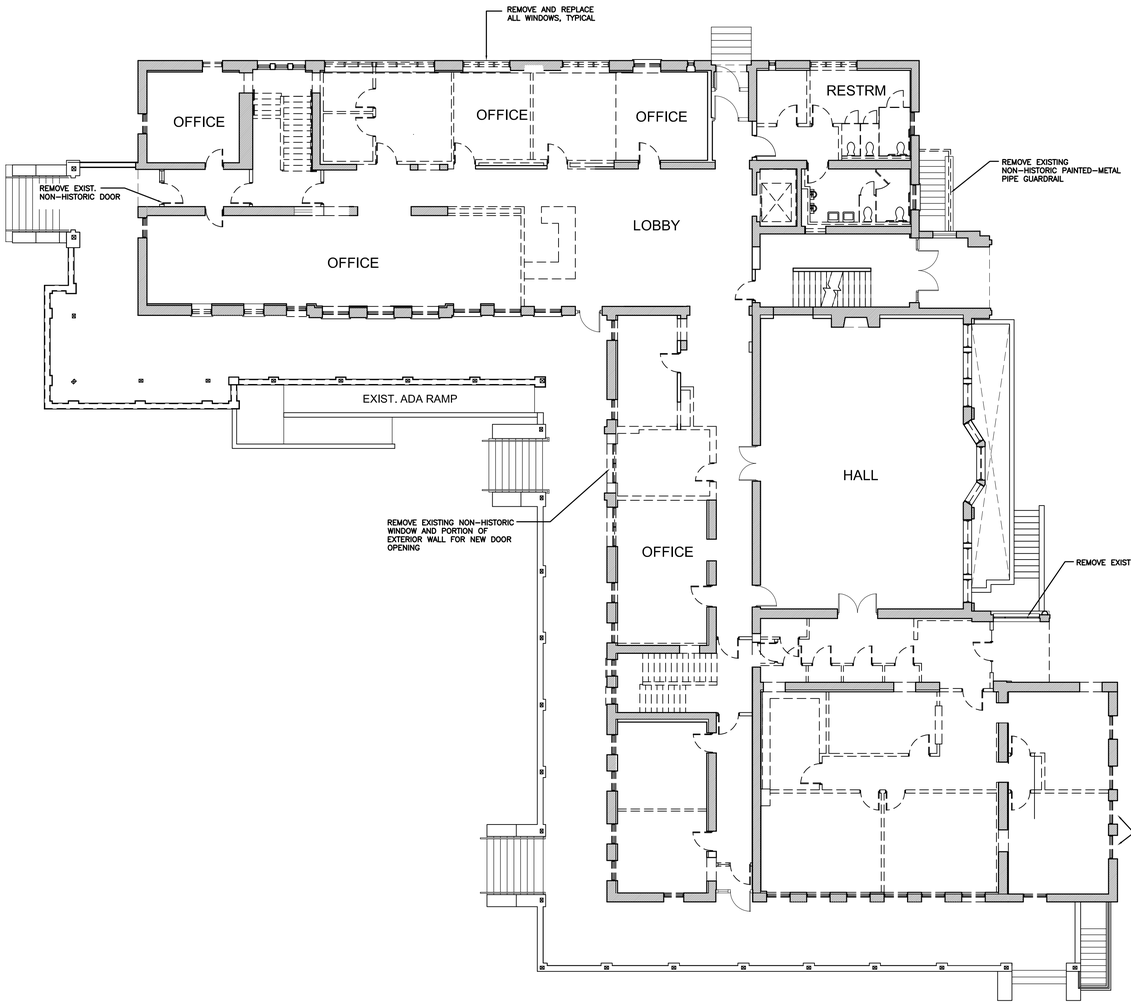
BASEMENT LEVEL FLOOR PLAN PLANS

0 1' 5' 10' 20'
SCALE: 3/32" = 1'-0"

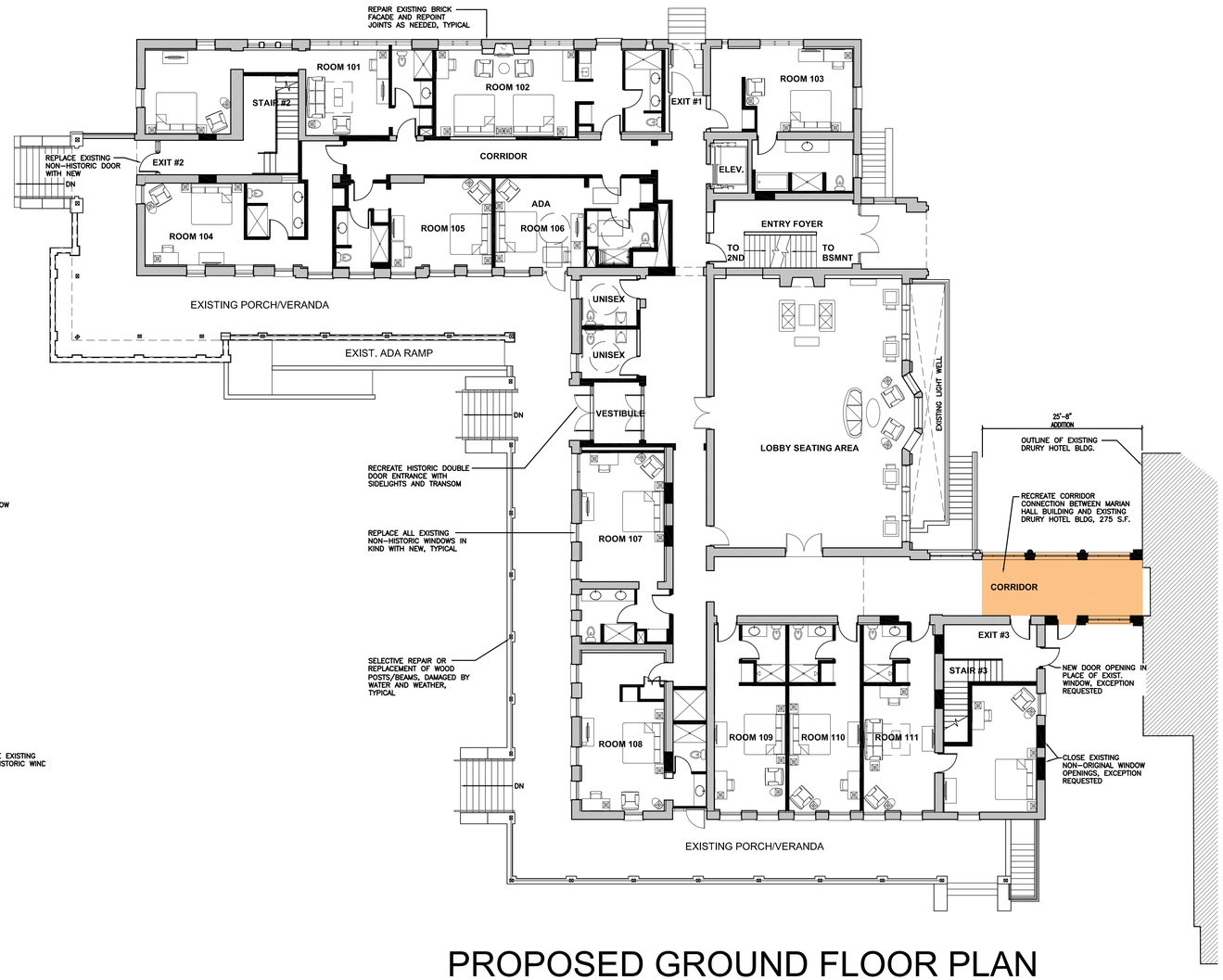
04/14/2025

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A1.0



EXISTING GROUND FLOOR PLAN



PROPOSED GROUND FLOOR PLAN

LEGEND

- WALLS TO BE DEMOLISHED
- EXISTING WOOD FRAME WALLS
- EXISTING MASONRY WALLS
- NEW WALLS
- PROPOSED ADDITION AREA

DRURY PLAZA

GROUND FLOOR PLAN PLANS

0 1' 5' 10' 20'
SCALE: 3/32" = 1'-0"

04/14/2025

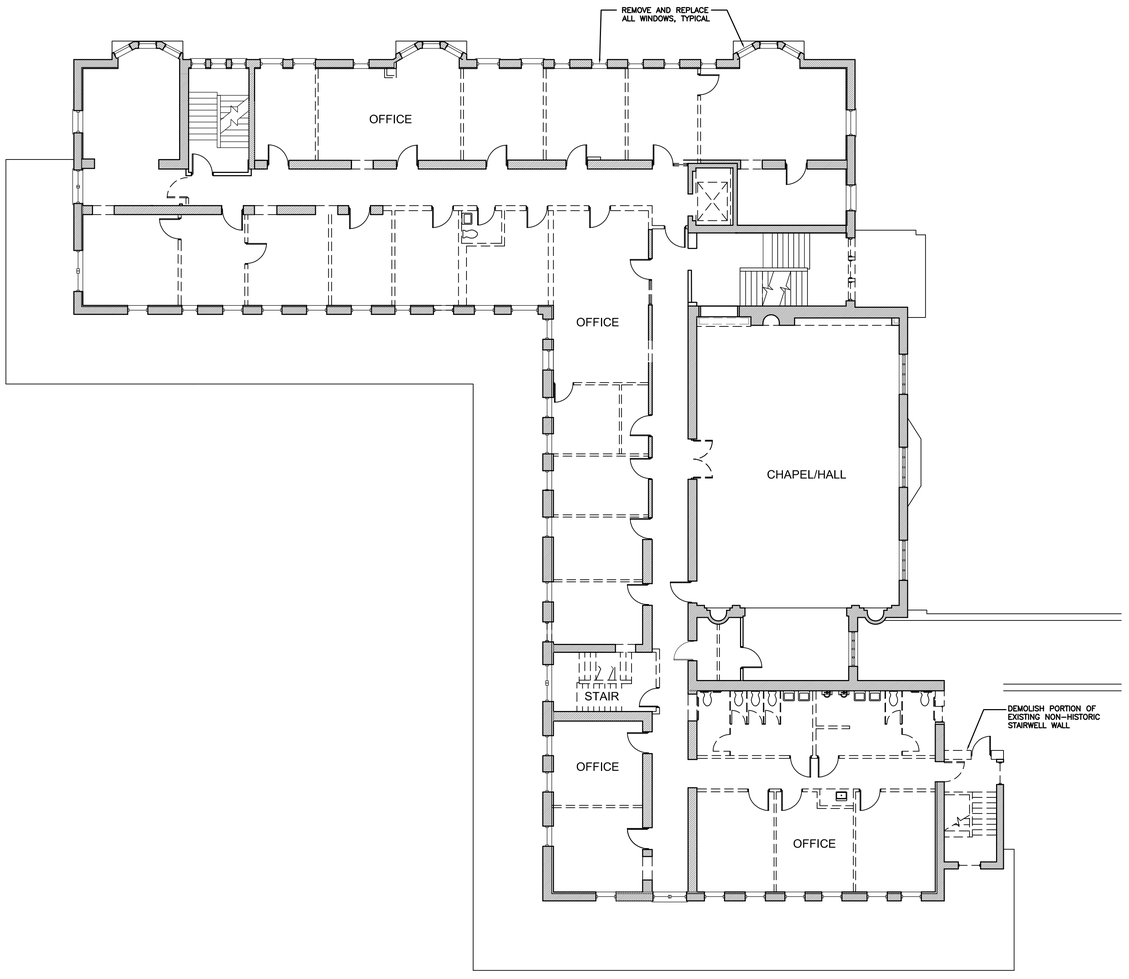
DIMITROVDESIGNSTUDIO LLC

N

A1.1

LEGEND

- WALLS TO BE DEMOLISHED
- EXISTING WOOD FRAME WALLS
- EXISTING MASONRY WALLS
- NEW WALLS
- PROPOSED ADDITION AREA



EXISTING SECOND FLOOR PLAN



PROPOSED SECOND FLOOR PLAN

DRURY PLAZA

SECOND FLOOR PLAN PLANS

0 1' 5' 10' 20'

SCALE: 3/32" = 1'-0"

04/14/2025

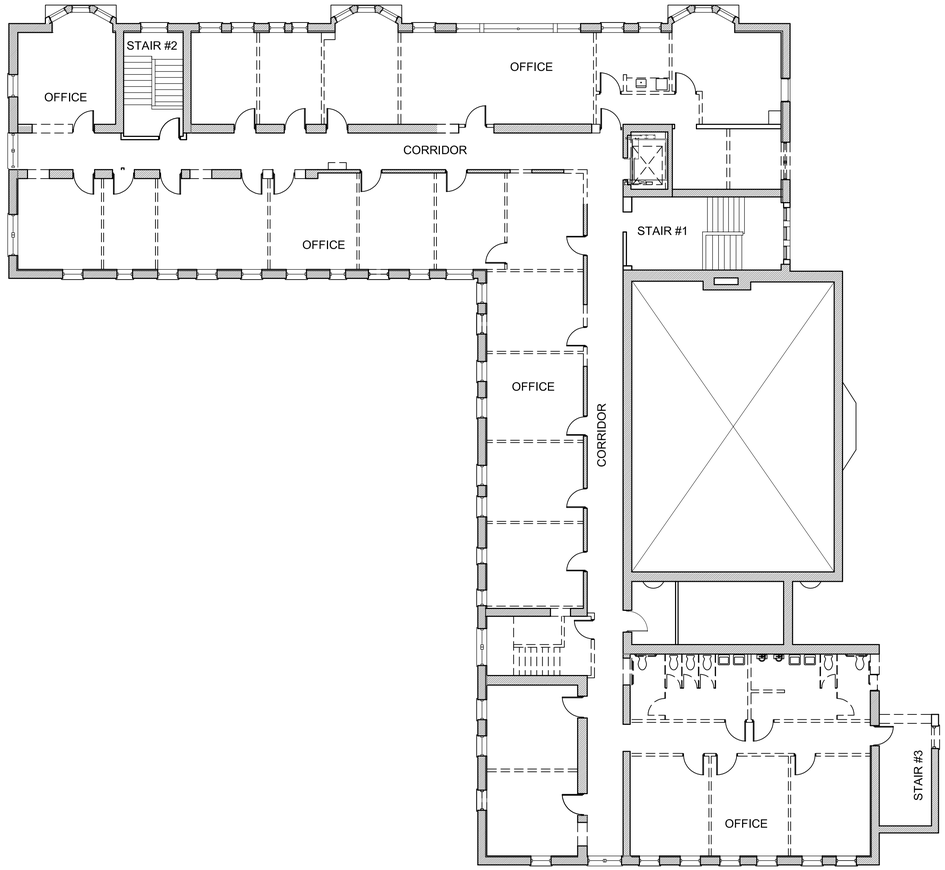
DIMITROVDESIGNSTUDIO LLC

N

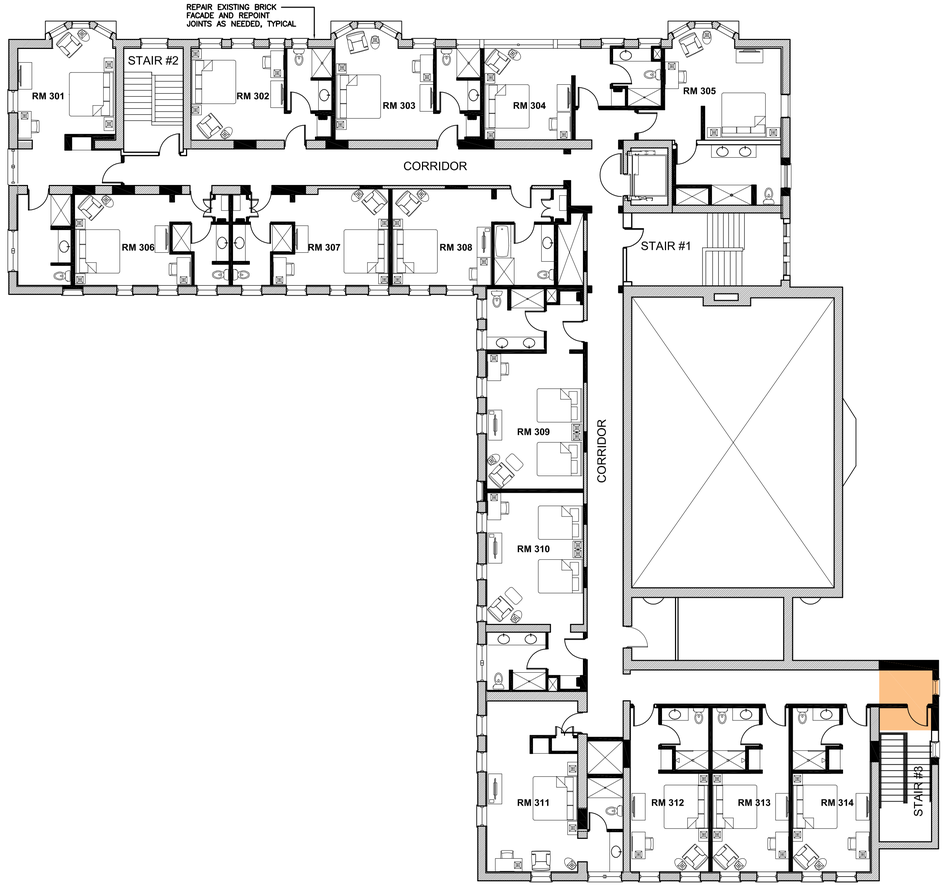
A1.2

LEGEND

- WALLS TO BE DEMOLISHED
- EXISTING WOOD FRAME WALLS
- EXISTING MASONRY WALLS
- NEW WALLS
- PROPOSED ADDITION AREA



EXISTING THIRD FLOOR PLAN



PROPOSED THIRD FLOOR PLAN

DRURY PLAZA

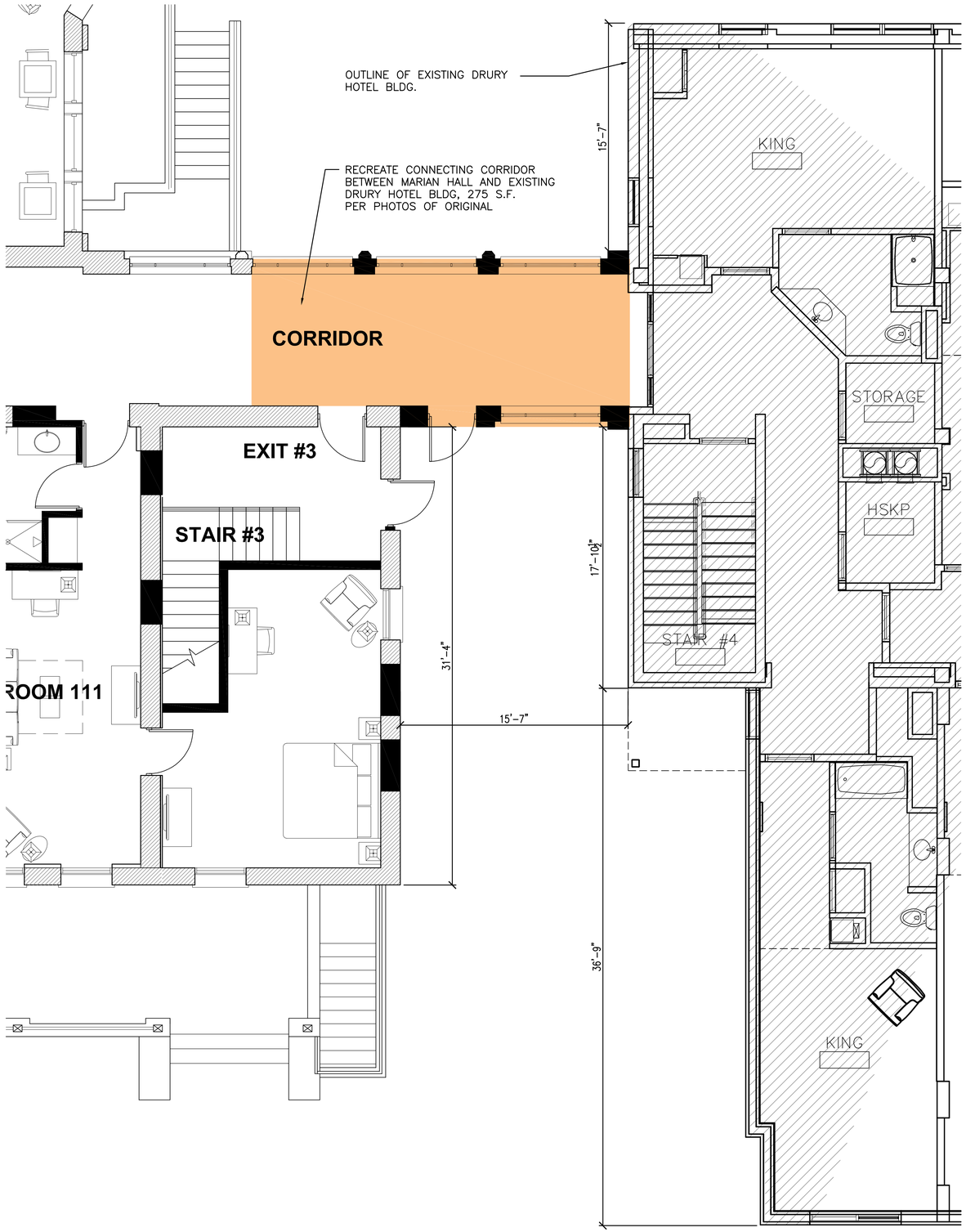
THIRD FLOOR PLAN PLANS

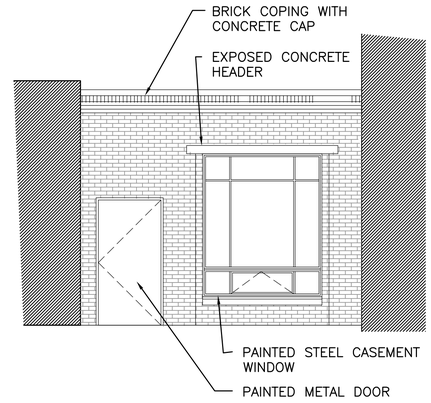
0 1' 5' 10' 20'
SCALE: 3/32" = 1'-0"

04/14/2025

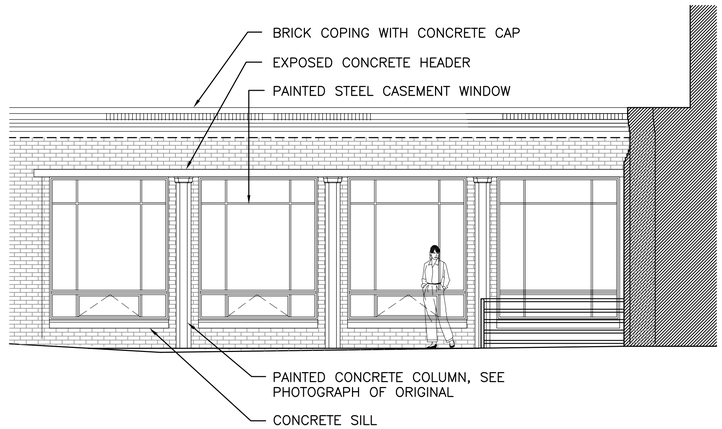
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A1.3





PROPOSED CONNECTION - SOUTH FACADE



PROPOSED CONNECTION - NORTH FACADE





ORIGINAL CONNECTING CORRIDOR BY JOHN GAW MEEM

DRURY PLAZA

ENLARGED PLAN - PROPOSED CONNECTING CORRIDOR

04/14/2025

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A1.4



EXISTING SOUTH ELEVATION

SCALE: 1/8" = 1'-0"



DRURY PLAZA

PROPOSED SOUTH ELEVATION

SCALE: 1/8" = 1'-0"

04/14/2025

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N

A2.1



EXISTING NORTH ELEVATION

SCALE: 1/8" = 1'-0"



DRURY PLAZA

PROPOSED NORTH ELEVATION

SCALE: 1/8" = 1'-0"

04/14/2025

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N

A2.2



EXISTING WEST ELEVATION

SCALE: 1/8" = 1'-0"



DRURY PLAZA

PROPOSED WEST ELEVATION

SCALE: 1/8" = 1'-0"

04/14/2025

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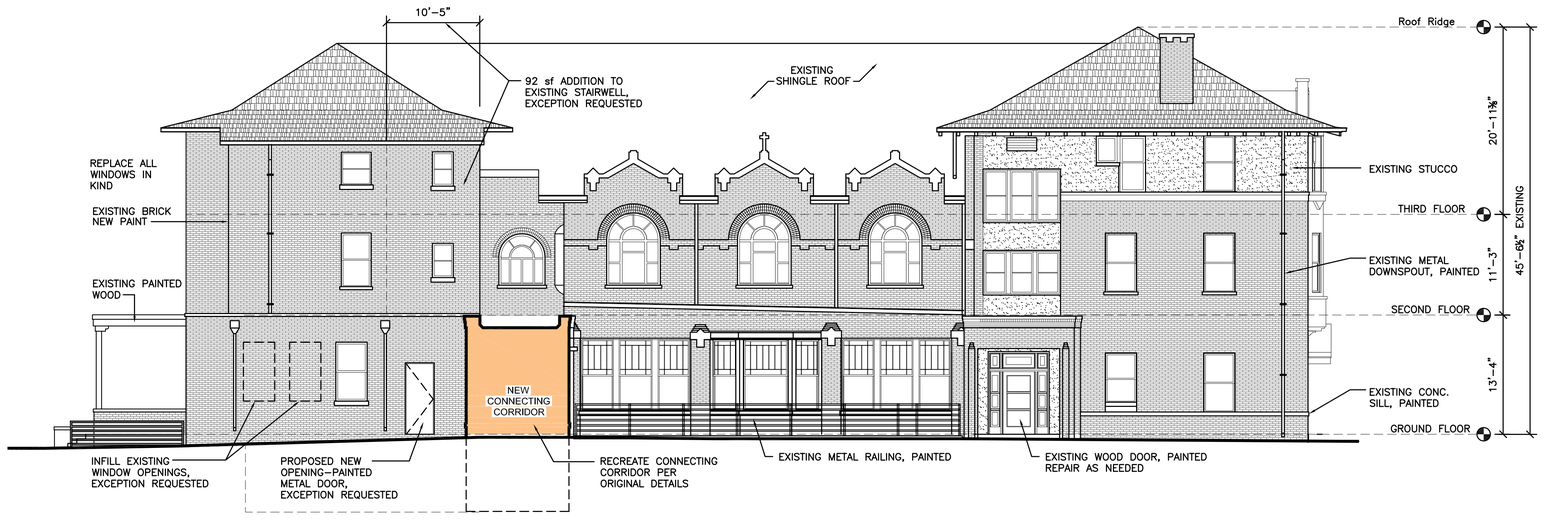
N

A2.3



EXISTING EAST ELEVATION

SCALE: 1/8" = 1'-0"



DRURY PLAZA

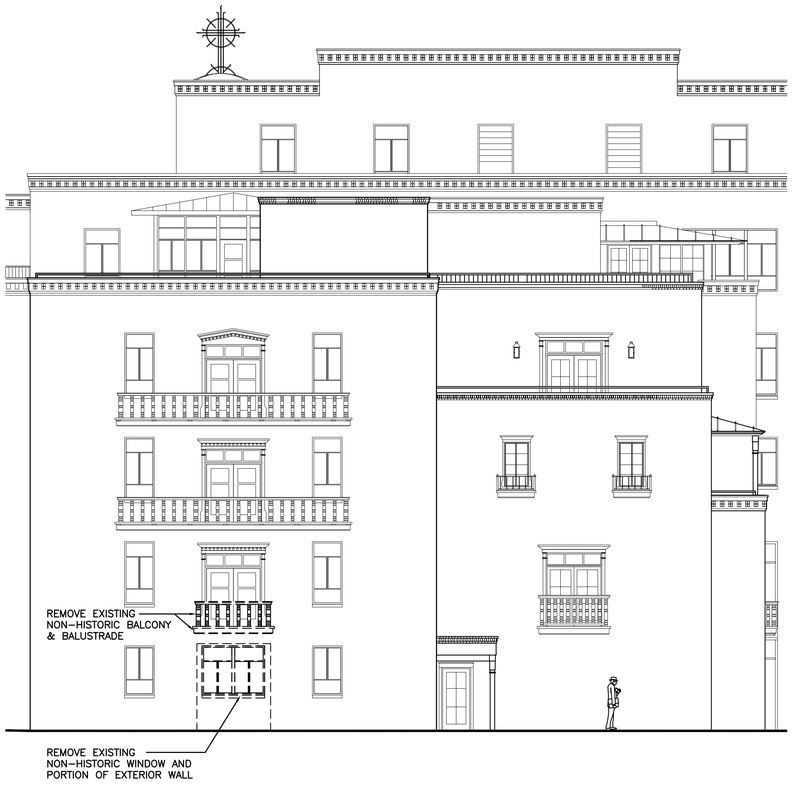
PROPOSED EAST ELEVATION

SCALE: 1/8" = 1'-0"

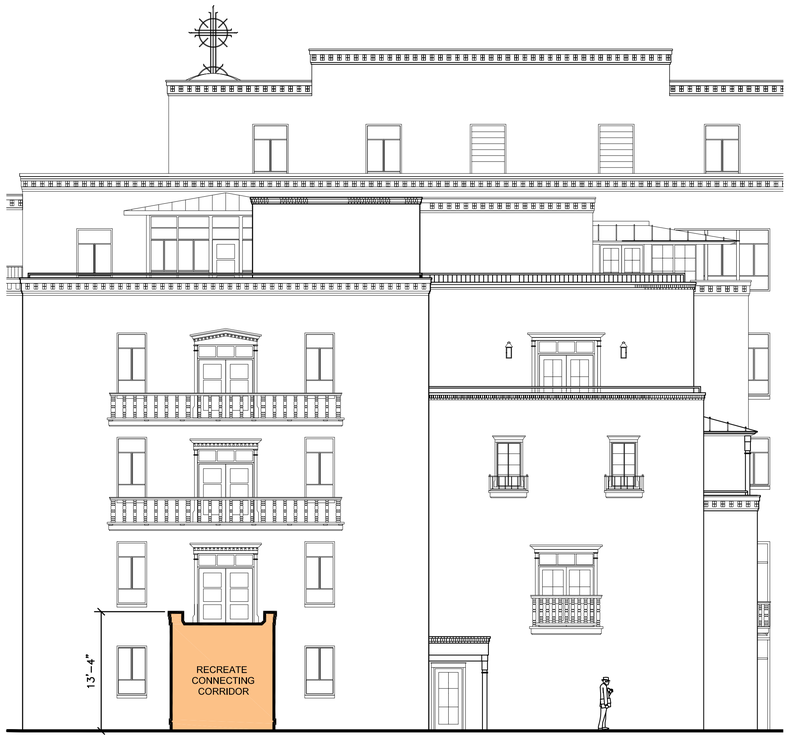
04/14/2025

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A2.4



DRURY HOTEL - EXISTING WEST ELEVATION



DRURY HOTEL - PROPOSED WEST ELEVATION

DRURY PLAZA

DRURY HOTEL WEST ELEVATION

SCALE: 1/8" = 1'-0"

04/14/2025

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A2.5