



March 4, 2022

By Email to deborahTackett@miamibeachfl.gov

By Email to barrykleinboa@gmail.com

By Email to bresaro@aol.com

By Email to kpaskalmb@gmail.com

By Email to laura@lawassocinc.com

By Email to nanlieb@aol.com

By Email to rick.hpb@gmail.com

By Email to stuartreesq@aol.com

Chairman and Members of the Historic Preservation Board
c/o Debbie Tackett, Chief of Historic Preservation
City of Miami Beach
1700 Convention Center Drive
Miami Beach, Florida 33139

Re: Objection to Application for Certificate of Appropriateness for partial demolition and renovation of two buildings on the site, the total demolition of two buildings, the construction of two new additions and landscape and hardscape modifications for the property located at 1901 Collins Avenue, Miami Beach, Florida (Historic Preservation Board File No. 21-0481). (Shore Club Project)

Dear Chairman and Members of the Historic Preservation Board,

I represent the following entities/persons:

1. **Setai Resort & Residences Condominium Association, Inc.** The Association of the owners of the condominium units located at 101 20th Street, Miami Beach, Florida.
2. **Setai Hotel Acquisition, LLC / The Dempsey-Vanderbilt Hotel.** Own/Control 88 units in the Dempsey-Vanderbilt Hotel located at 2001 Collins Avenue, Miami Beach, Florida. Setai Hotel Acquisition, LLC controls the restaurants and common areas of the Setai Resort and Residences
3. **Setai 1802, LLC.** Owner of Unit No. 1802 of the Setai Resort and Residences located at 101 20th Street , Miami Beach, Florida.
4. **Setai 1808, LLC.** Owner of Unit No. 1808 of the Setai Resort and Residences located at 101 20th Street , Miami Beach, Florida.

5. **Setai 2204, LLC.** Owner of Unit No. 2204 of the Setai Resort and Residences located at 101 20th Street , Miami Beach, Florida.
6. **Setai Unit 2304, LLC.** Owner of Unit No. 2304 of the Setai Resort and Residences located at 101 20th Street , Miami Beach, Florida.
7. **Two W Unit, LLC.** Owner of Unit No. 2508 of the Setai Resort and Residences located at 101 20th Street , Miami Beach, Florida.
8. **Dr. Stephen Soloway.** Owner of Unit No. 3701 of the Setai Resort and Residences located at 101 20th Street , Miami Beach, Florida.

(collectively "The Dempsey-Vanderbilt and the Setai Condo and the specified unit owners") concerning the above referenced matter. The Dempsey-Vanderbilt and the Setai Condo and the specified unit owners' properties are on the north side of 20th Street, immediately across the street and directly impacted by, the Applicant Shore Club Property Owner, LLC's development project at 1901 Collins Avenue, and on 20th Street, Miami Beach, Florida.

The Dempsey-Vanderbilt hotel and the Setai Condo and the specified unit owners hereby advise the Board of their objection to the proposed application. We incorporate the graphic presentation submitted to the Historic Preservation Board which is attached to this letter.

Proposed Project Incompatible with Historic and Contributing Building, and Inconsistent with Review Criteria

The Staff Report fails to provide a credible evaluation determining whether the project is compatible with the surrounding properties, compatible with the historic and contributing buildings on the site, and meets the Secretary of Interior Standards and the Certificate of Appropriate Criteria, especially §118-564(3)d, e, j, and m. See graphic presentation submitted to the Historic Preservation Board which is attached to this letter.

Total Demolition of Contributing Grossman Annex Building Not Supported by Review Criteria

Additionally, the City Staff Report and the Application did not evaluate the criteria for determining the appropriateness of the total demolition of the 1955 Shore Club Melvin Grossman Annex, a contributing building in the Ocean Drive/Collins Avenue historic district. The engineer report submitted concerning the Grossman Annex does not meet the requirements of §118-562.

Moreover, the total demolition of the Grossman Annex is not supported by the review criteria for demolition because, under the evaluation criteria of §118-564 (f) (4), the staff should consider whether:

1. the building is of such historic/architectural interest and quality that it meets designation as a contributing building pursuant to §118-564 (f) (4) a.
2. the building is a contributing building in a historic district pursuant to §118-564 (f) (4) d.
3. the retention of the building promotes the general welfare of Miami Beach by providing an opportunity for study of the history of local architecture and design. District pursuant to §118-564 (f) (4) e.

Contributing Grossman Annex Building to be Totally Demolished

The Staff Report, at page 8, erroneously stated that the Applicant is not proposing the total demolition of a contributing building when the Applicant is proposing the total demolition of the contributing Grossman Annex building, a building separated by expansion joints from the original Shore Club building. The Staff Report at page 8, concerning the total demolition of the contributing Grossman Annex building, erroneously stated that the 1955 building did not contain significant architectural details, which is contrary to the photographs submitted showing those buildings. The building had been previously identified and classified as contributing.

Revision of Curb Cut to Loading Spaces Not Supported by Traffic Maneuverability Study

The proposed revision of the loading spaces and the reduction of the curb cut will render the loading area dysfunctional and not in compliance with the specifications showing the Applicant's Traffic Engineering Report on loading maneuverability, which shows the SU-40 vehicles entering a loading space with a much wider curb cut. It is obvious that the narrowing of the curb cut will render the entrance to the loading area to be geometrically dysfunctional. No new maneuverability analysis has been submitted by the traffic engineer addressing the curb cut revisions.

Project Should Be Redesigned

The Staff Report is faulty on its face and should be stricken and a new evaluation by staff should be ordered by this Board. Once it is determined that the contributing Grossman Annex building should be retained, then the Applicant should be directed to redesign the building consistent with the review criteria and thereby render its design, massing and siting sensitive to the contributing buildings on site and the surrounding area, to be compatible with the historic district, preserving the character of the neighborhood and

historic district, as well as the contiguous and adjacent buildings and view corridors and to enhance the appearance of the surrounding properties.

Sincerely,

Kent Harrison Robbins

Kent Harrison Robbins

Attorney for the Setai Resort and Residences Condominium Association, Inc., Setai Hotel Acquisition, LLC / the Dempsey-Vanderbilt, Setai 1802, LLC, Setai 1808, LLC, Setai 2204, LLC, Setai Unit 2304, LLC, Two W Unit, LLC and Dr. Stephen Soloway.

Enclosure: Graphic Presentation

cc: Tom Mooney, Planning Director: ThomasMooney@miamibeachfl.gov
Nick Kallergis, First Assistant City Attorney: NickKallergis@miamibeachfl.gov
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Steven Meiner, City Commissioner: stevenmeiner@miamibeachfl.gov
Ricky Arriola, City Commissioner: RickyArriola@miamibeachfl.gov
David Richardson, City Commissioner: DavidRichardson@miamibeachfl.gov
Alex Fernandez, City Commissioner: Alex@miamibeachfl.gov
Kristen Rosen Gonzalez, City Commissioner:
Kristenrosengonzalez@miamibeachfl.gov

Deborah Tackett, Chief of Historic Preservation

February 14, 2022

2

- A. The three-story contributing Shore Club Hotel building fronting the east side of Collins Avenue developed in 1949 by Albert Anis (the "Shore Club Building");
- B. The eight-story contributing Cromwell Hotel building fronting the south side of 20th Street developed in 1939 by Robert A. Taylor (the "Cromwell Building");
- C. The eight-story contributing addition to the south side of the Shore Club Building developed in 1955 by Melvin Grossman (the "Annex"); and
- D. The twenty-story non-contributing addition at the center of the Property and non-contributing cabanas developed by David Chipperfield Architects in 2001 (the "Chipperfield Additions").

See Figure 1, below.

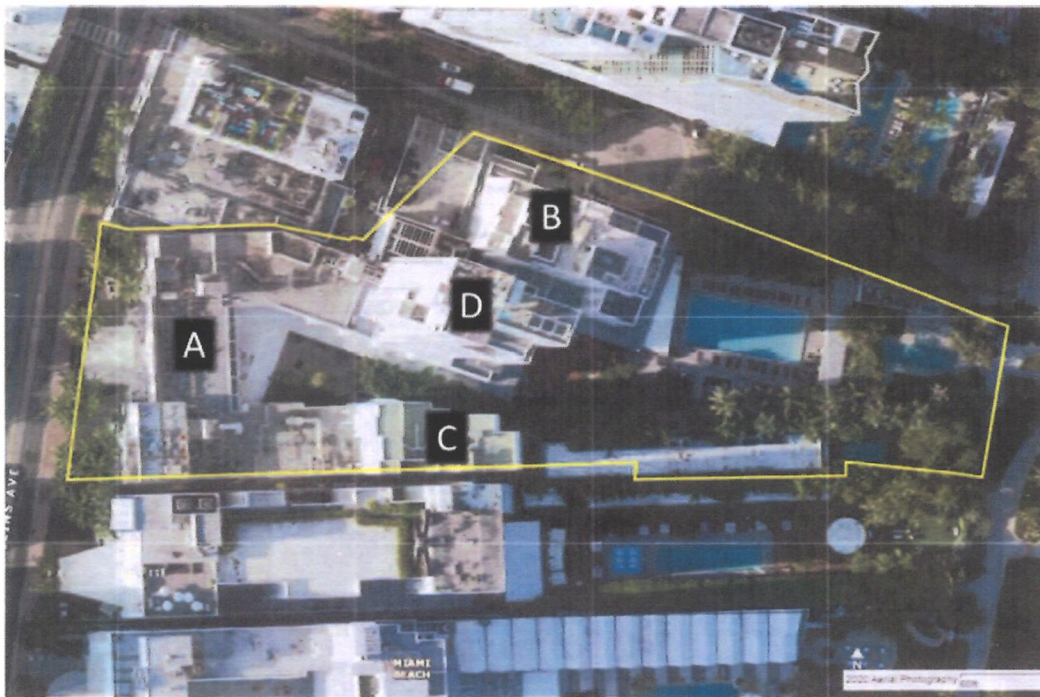


Figure 1: Aerial of Property with: A) Shore Club Building(Contributing); B) Cromwell Building (Contributing); C) the Annex (Contributing); and D) Chipperfield Additions (Non-Contributing).

The Property contains a mosaic of architectural styles that characterize the City's rich cultural heritage. For instance, the Cromwell is a classic Art Deco design and the Original Shore Club Building is an excellent example of the post-war Miami-Modern ("MiMo") style. The blend of architectural styles makes the Property uniquely important to the City's heritage and architectural tradition. The proposed design by Robert A.M.



The Law Offices of Kent Harrison Robbins, P.A.

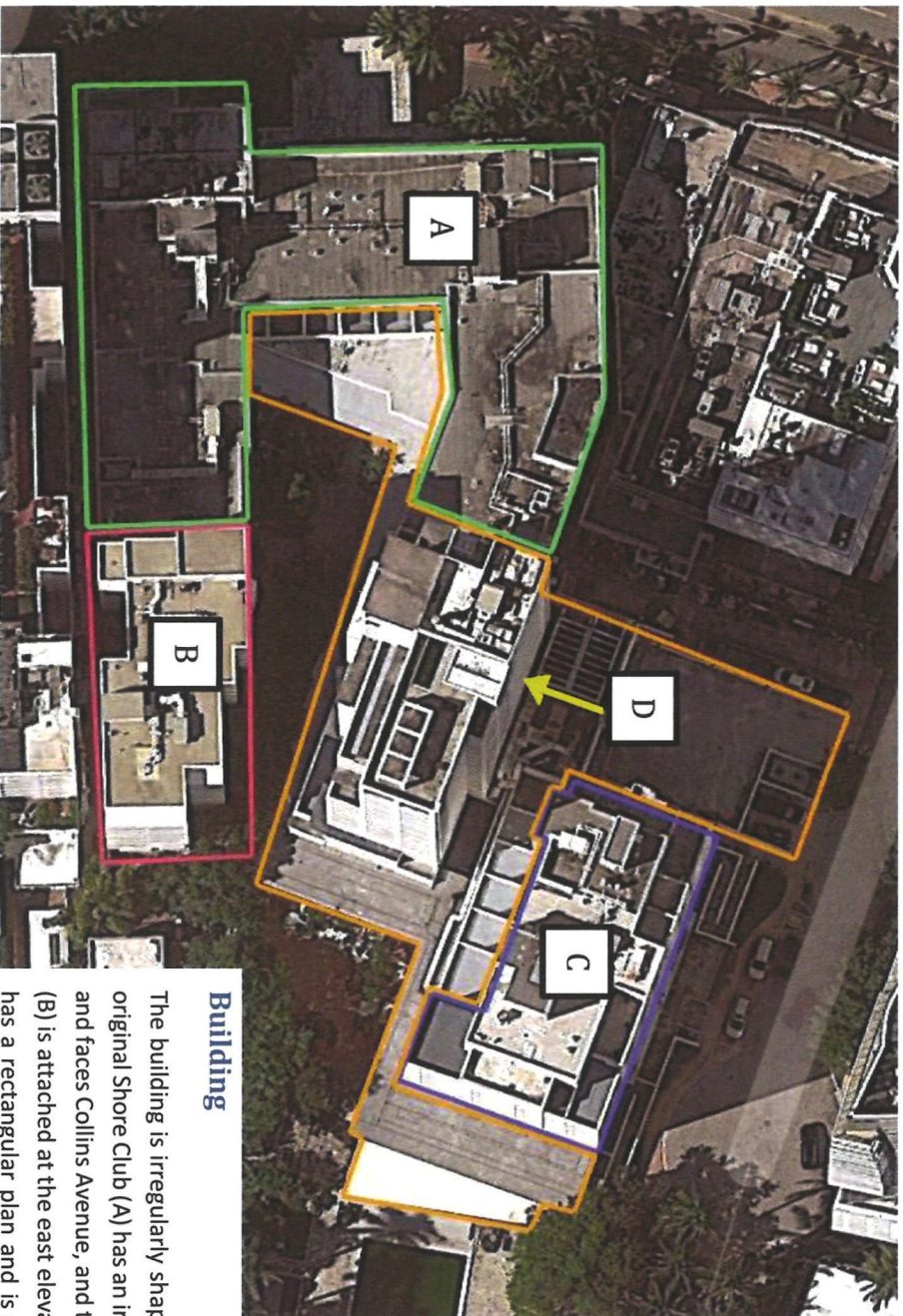
Historic Preservation Board
File No. 21-0481

1901 Collins Avenue
Shore Club

Presentation by Law Offices of Kent Harrison Robbins, P.A.
on behalf of the Setai Resort & Residences Condominium
Association, Inc., Setai Hotel Acquisition, LLC / the Dempsey-
Vanderbilt, Setai 1802 LLC, Setai 1808, LLC, Setai 2204, LLC, Setai
Unit 2304 LLC, Two W Unit, LLC and Dr. Stephen Soloway.

March 8, 2022

THE FOUR BUILDINGS OF THE SHORE CLUB



Building

The building is irregularly shaped and is comprised of four distinct components. (Fig. 145) The original Shore Club (A) has an irregular "U"-shaped plan. The front facade is oriented north-south and faces Collins Avenue, and two wings extend to the east. The 1955 addition to the Shore Club (B) is attached at the east elevation of the south wing of the "U". The former Cromwell Hotel (C) has a rectangular plan and is situated on a horizontal axis roughly parallel to 20th Street. The 1999-2001 additions (D) include the 20-story tower and the low-scale structures that connect the former Cromwell and the original Shore Club buildings.

SHORE CLUB

**1955 MELVIN GROSSMAN
ADDITION**

**CONTRIBUTING BUILDING TO
BE DEMOLISHED**

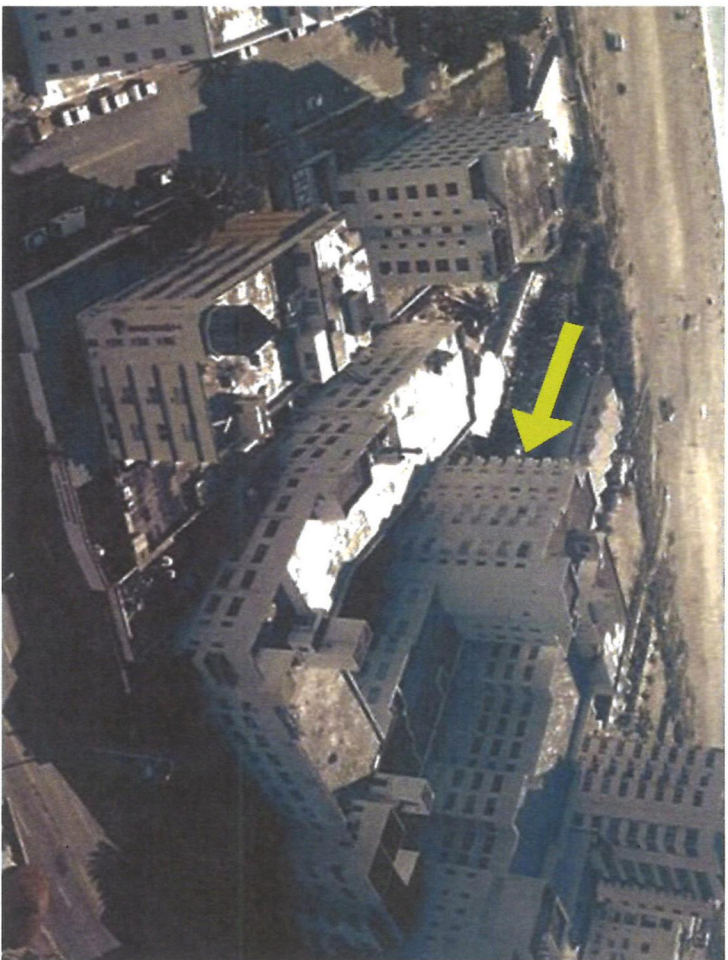


Fig. 69. Aerial view of Shore Club and former Cromwell, looking southeast, 1997. (Chipperfield, Shore Club HRR)

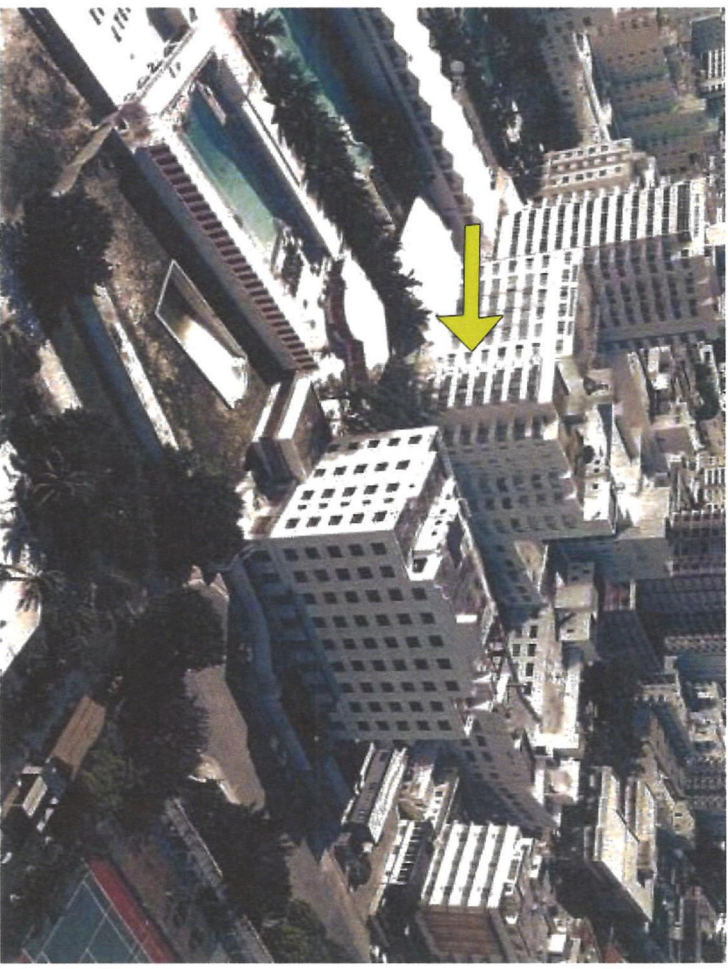


Fig. 70. Aerial view of Shore Club and former Cromwell, looking southwest, 1997. (Chipperfield, Shore Club HRR)

North Elevation

The north elevation features several setbacks. Projecting angled window bays and corner windows provide ocean views. (Fig. 179, Fig. 180, Fig. 181)



Fig. 179. View of north elevation of 1955 Shore Club Tower, looking southeast, July 2021.

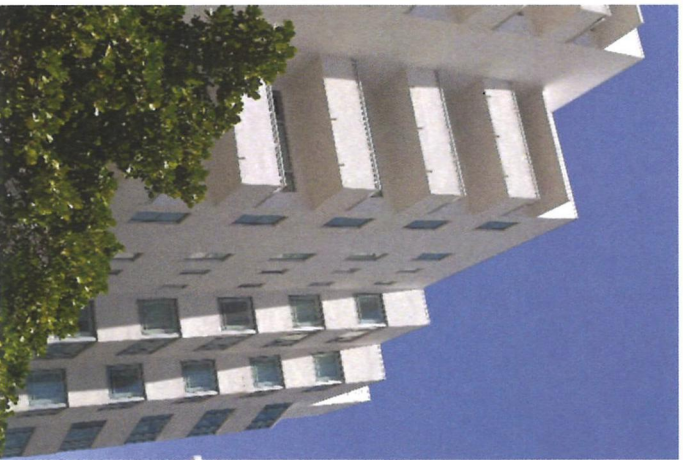


Fig. 180. View of north elevation, looking west, July 2021.



Fig. 181. Detail of angled windows at north elevation, July 2021.

East Elevation

The east elevation is “L”-shaped with a setback at the north end to provide maximum ocean views. Projecting balconies with solid knee walls are present at each level, and an eyebrow ledge shelters the balconies at the top level. (Fig. 182, Fig. 183, Fig. 184)



Fig. 182. View of east elevation, looking west, July 2021.

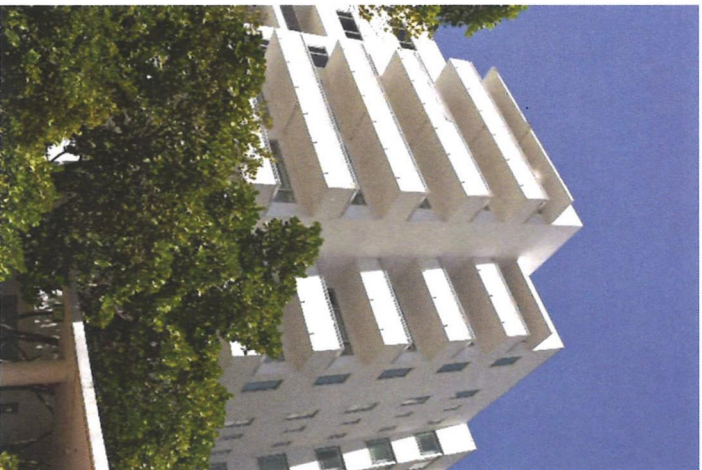


Fig. 183. View of east elevation, looking southwest, July 2021.

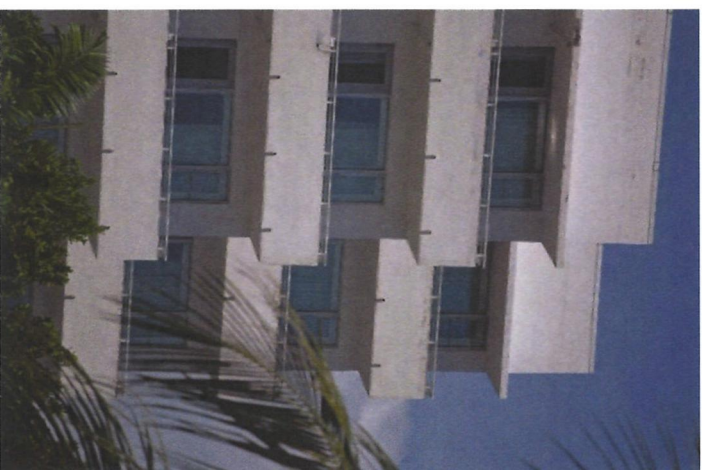
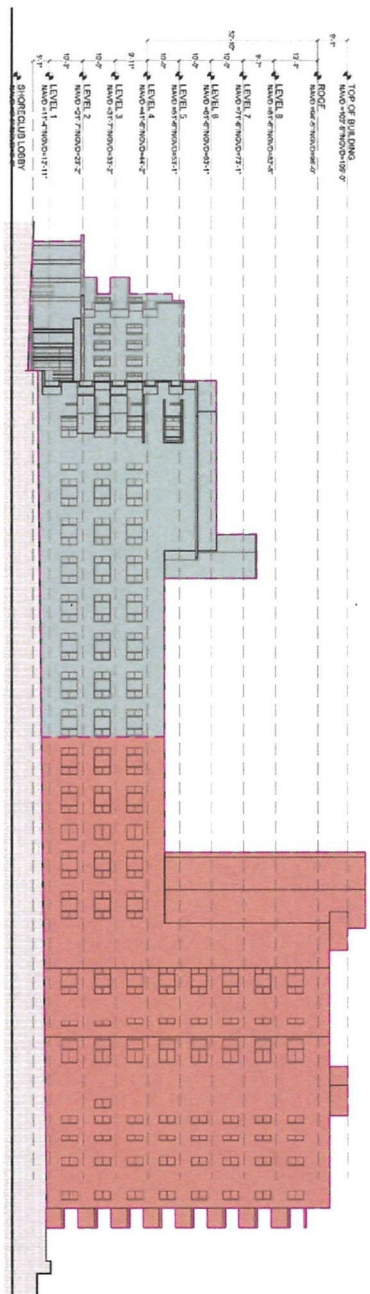
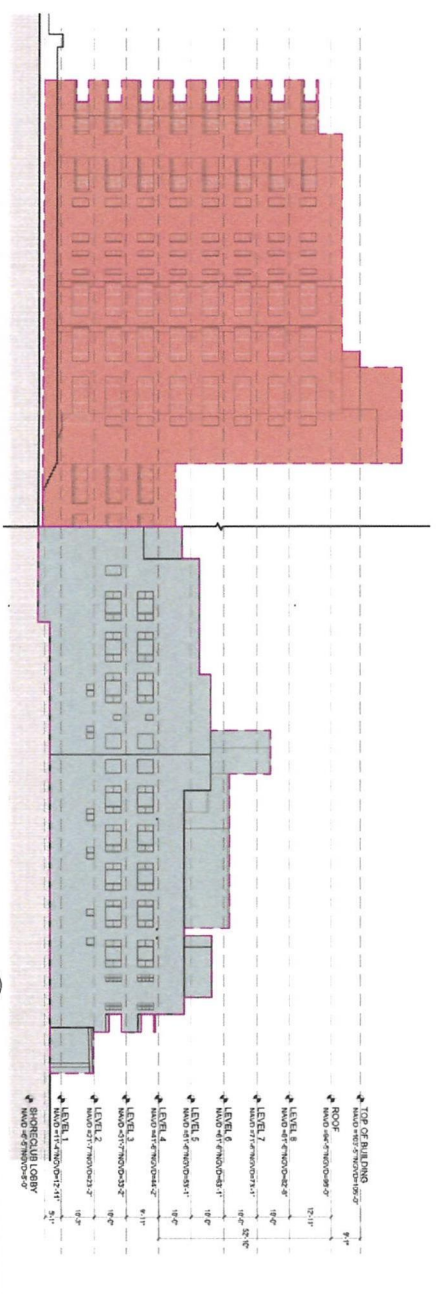


Fig. 184. Detail of balconies at east elevation, July 2021.

SHORE CLUB DEMOLITION PLANS



1 DEMOLITION SHORECLUB SOUTH ELEVATION
SCALE: 1/32" = 1'-0"



2 DEMOLITION SHORECLUB NORTH ELEVATION
SCALE: 1/32" = 1'-0"

DEMOLITION LEGEND

[Red hatched box]	EXISTING STRUCTURE TO BE REMOVED IN ITS ENTIRETY
[Red outline box]	REMOVE INTERIOR PARTITION WALLS, WINDOW, HORIZONTAL AND POOLS
[Red outline box]	REMOVE SLAB
[Red outline box]	NO DEMOLITION THIS AREA, EXISTING STRUCTURE TO REMAIN, PROTECT FROM DAMAGE

1	EXISTING ROOF WINDOW TO REMAIN	4	EXISTING FLOOR TO BE REMOVED & REPAVED AS NEW HISTORIC DATA
2	WINDOW TO BE REPAVED	5	REMOVED FLOOR TO BE REPAVED
3	REMOVE THE FLOOR TO BE REMOVED	6	REMOVE PARTITIONS OF WALL PER HISTORIC
4	REMOVE PARTITIONS OF WALL PER HISTORIC	7	REMOVE PARTITIONS OF WALL PER HISTORIC
5	REMOVE PARTITIONS OF WALL PER HISTORIC	8	REMOVE PARTITIONS OF WALL PER HISTORIC
6	REMOVE PARTITIONS OF WALL PER HISTORIC	9	REMOVE PARTITIONS OF WALL PER HISTORIC
7	REMOVE PARTITIONS OF WALL PER HISTORIC	10	REMOVE PARTITIONS OF WALL PER HISTORIC

DEMOLITION GENERAL NOTES

1. DEMOLITION SHALL BE IN ACCORDANCE WITH ALL HISTORIC ELEMENTS OF THE BUILDING INCLUDING, BUT NOT LIMITED TO, ALL EXTERIOR WALLS, HISTORIC ARCHITECTURAL DETAILS, INTERIOR WALLS, CEILING, FLOORING, PARTITIONS AND THE ORIGINAL ELEVATION DATA LOCATION, SIZE, SHAPE, OR FINISHES NOTED.

2. ALL EXTERIOR WALL ELEVATION SHALL BE MAINTAINED AS MUCH AS POSSIBLE AND NOT TO BE RECONSTRUCTED UNLESS FULLY DEMONSTRATED BY A HISTORIC RESEARCHER OR ARCHITECT AS NECESSARY TO PROTECT HISTORIC AND ARCHITECTURAL SIGNIFICANCE AND PRESERVE ORIGINAL ARCHITECTURAL DETAILS THAT MAY EXIST BEHIND THE EXTERIOR FACADES AND ALL HISTORIC PARTITIONS TO BE MAINTAINED.

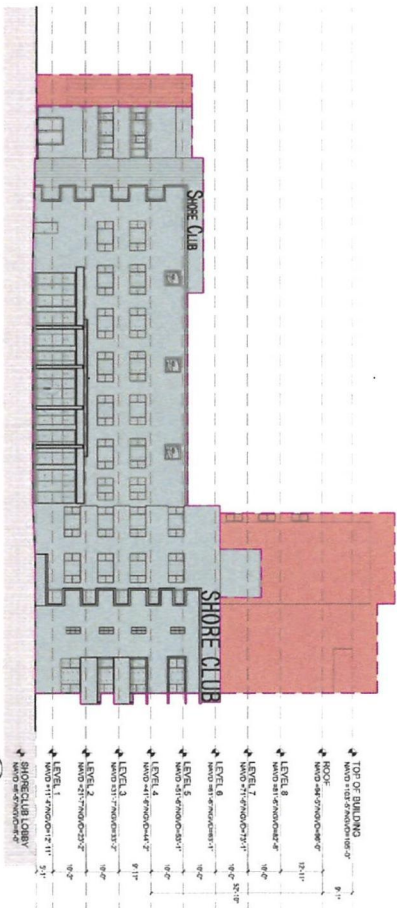
DEMOLITION SHORECLUB ELEVATIONS

DATE: 1/24/2021
SCALE: 1/32" = 1'-0"
PROJECT: DA.01

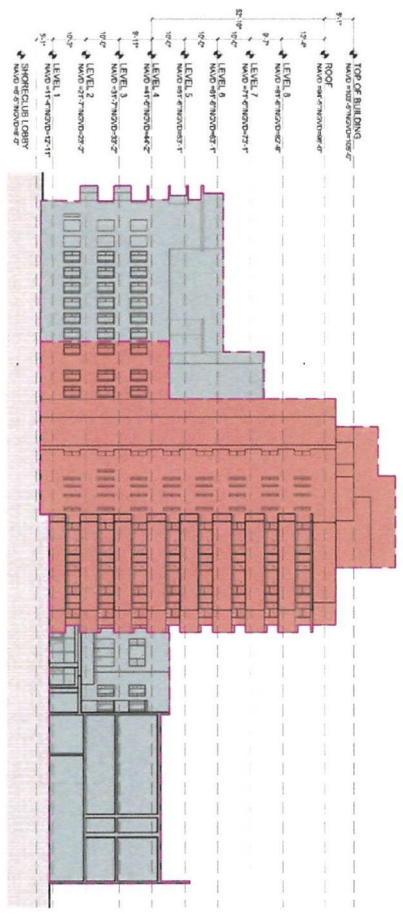
K O B I
K A R P

18101 Shoreclub Ave
Miami Beach, FL 33139

Client:	SHORECLUB
Address:	18101 Shoreclub Ave, Miami Beach, FL 33139
Project:	DEMOLITION SHORECLUB SOUTH ELEVATION
Architect:	K O B I K A R P
Scale:	1/32" = 1'-0"
Date:	1/24/2021



1 DEMOLITION SHORECLUB EAST ELEVATION
SCALE: 1" = 50'-0"



2 DEMOLITION SHORECLUB WEST ELEVATION
SCALE: 1/32" = 1'-0"

DEMOLITION LEGEND

	EXISTING STRUCTURE TO BE REMOVED IN ITS ENTIRETY		EXISTING WALLING TO BE REMOVED		REMOVED FLOOR TO BE
	REMOVE EXISTING PARTITION WALLS, WINDOWS, HANGERS AND DOORS		REMOVED AS PER HISTORIC DATA		EXISTING ROOMS TO BE
	REMOVE SLAB		EXISTING ROOMS TO BE		EXISTING ROOMS TO BE
	NO DEMOLITION IN THIS AREA, EXISTING STRUCTURE TO REMAIN PROTECT FROM DAMAGE		EXISTING ROOMS TO BE		EXISTING ROOMS TO BE

DEMOLITION GENERAL NOTES

- DEMOLITION IS INTENDED TO RESTORE AND REPAIR ALL HISTORIC ELEMENTS OF THE BUILDING INCLUDING, BUT NOT LIMITED TO, ALL EXISTING WALL, HISTORIC LOBBY FLOOR, CORNER WALLS, LOBBY CEILING, DOORCASE, DOOR AND THE ORIGINAL BRICK FACADE.
- ALL EXISTING WALLS AND ELEMENTS MUST BE REPAIR OR RESTORED TO ORIGINAL CONDITION AND APPROVED BY THE CITY OF MIAMI BEACH.
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Rev.	Date	Rev.	Date

Shore Club
1901 Carey Ave
Miami Beach, FL 33139



DEMOLITION SHORECLUB ELEVATIONS
DA.02

IMPACT OF DEMOLITION

DEMOLITION OF CONTRIBUTING BUILDING

- **Loss of an important MiMo structure.**
- **Adds 32,000 square feet to an excessively massive tower.**

**SHORE CLUB
PROPOSED
WEST ELEVATION**



A4.27 of Applicant's Final Submission Plans

**SHORE CLUB
PROPOSED
NORTH ELEVATION**



A4.25 of Applicant's Final Submission Plans



A4.25 of Applicant's Final Submission Plans

**SHORE CLUB
PROPOSED
EAST ELEVATION**



A4.24 of Applicant's Final Submission Plans

**SHORE CLUB
PROPOSED
SOUTH ELEVATION**



A4.26 of Applicant's Final Submission Plans

ORDINANCE §142-246(f)

**FOR LOTS GREATER THAN
115,000 SQUARE FEET**

- 1. TOWER MAY EXCEED 50 FEET
UP TO 200 FEET.**
- 2. TOWER MAY HAVE FLOORPLATE
UP TO A MAX OF 20,000 SQUARE FEET.**

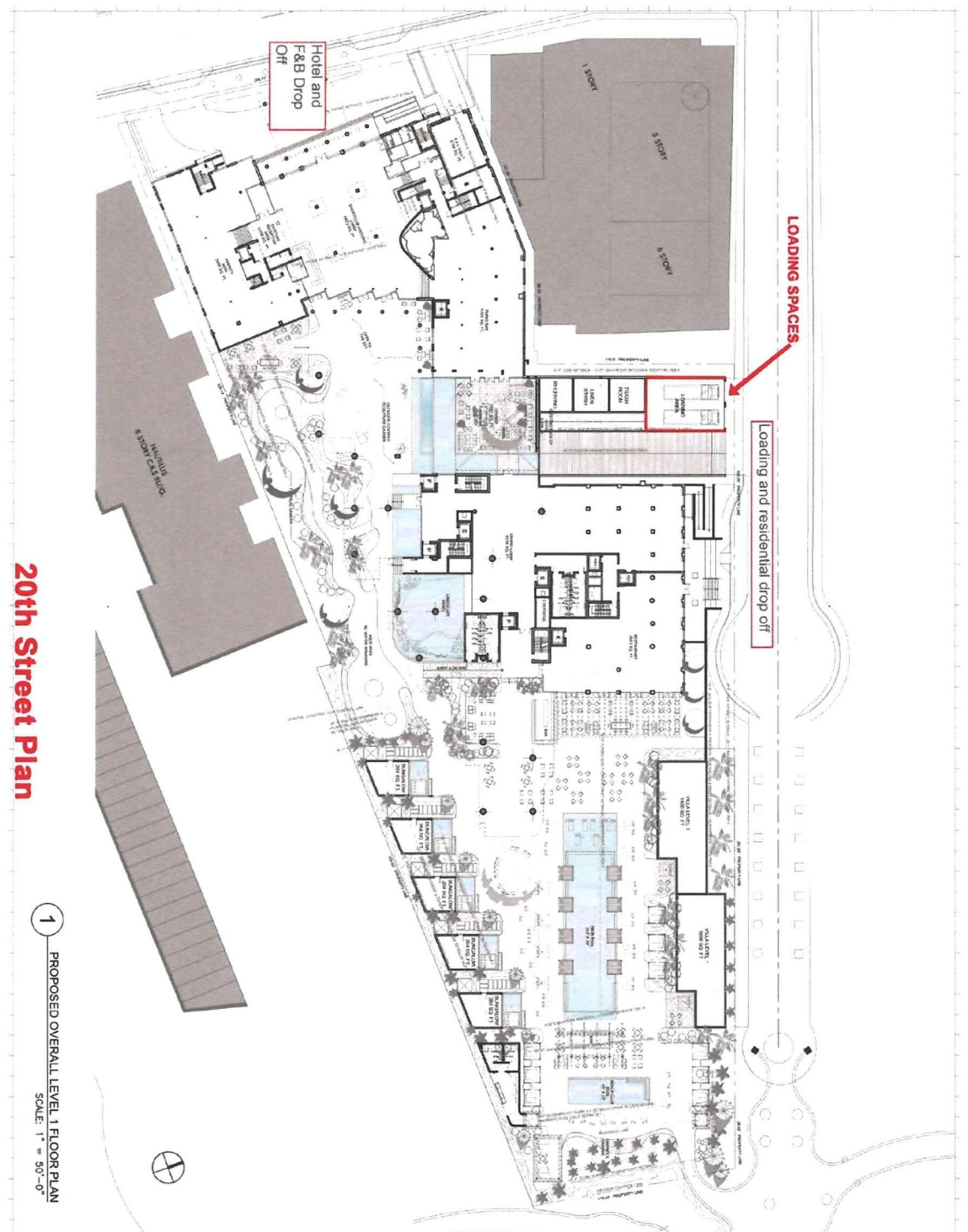
Miami Beach Code, §142-246 (f) states as follows:

Notwithstanding the above, for oceanfront lots located in the architectural district, with a lot area greater than 115,000 square feet, a ground floor addition, whether attached or detached, may exceed 50 feet in height, but shall not exceed 200 feet in height, in accordance with the following provisions:

- 1) Placement of the structure. The ground floor addition shall be located internal to the site, and shall be set back a minimum of 100 feet from the front property line, 75 feet from the streetside property lines, and 100 feet from the rear (oceanfront) property line.
- 2) Limits on the floorplate of additions exceeding 50 feet in height. The maximum floor plate size for the portion of an addition that exceeds 50 feet in building height is 15,000 square feet per floor, excluding projecting balconies. The historic preservation board may approve an increase in this overall floor plate, up to a maximum of 20,000 square feet per floor, excluding balconies, in accordance with the certificate of appropriateness criteria in chapter 118, article X of these land development regulations.

20th STREET
LOADING AREA
MANEUVERABILITY STUDY

(FROM APPLICANT'S TRAFFIC STUDY)

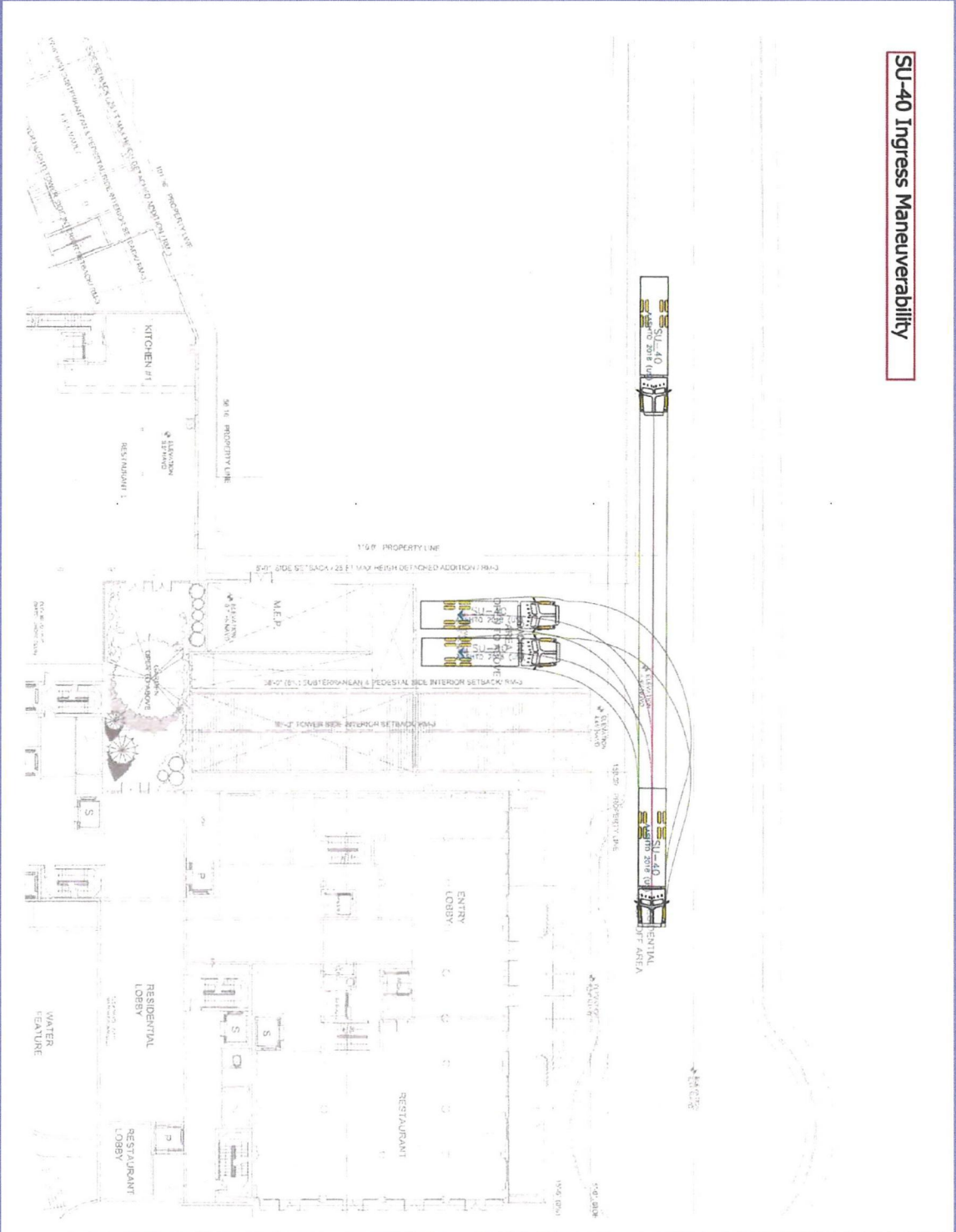


20th Street Plan

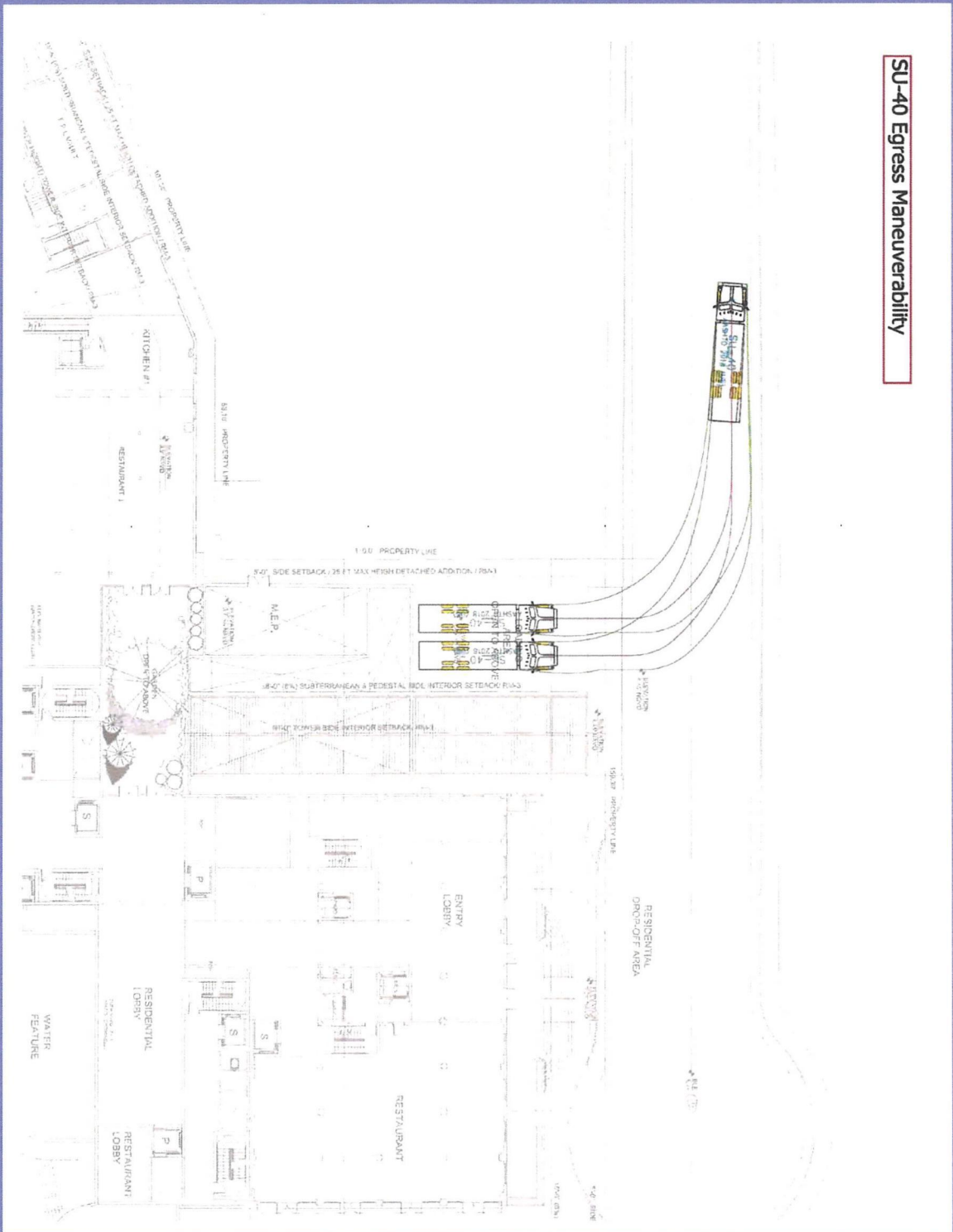
1 PROPOSED OVERALL LEVEL 1 FLOOR PLAN
SCALE: 1" = 50'-0"

<p>DATE: 06-14-2011 TIME: 11:29:07 USER: [redacted]</p>	<p>PROJECT: A3.01</p>
<p>PROPOSED LEVEL 1</p>	
<p>K O B I K A R P</p>	
<p>Architect of Record: 1801 Central Ave Norfolk, VA 23510 Phone: 757.622.1100 Fax: 757.622.1100</p>	
<p>Shore Club 1801 Central Ave Norfolk, VA 23510</p>	
<p>OWNER: DATE: 06-14-2011 TIME: 11:29:07 USER: [redacted]</p>	

SU-40 Ingress Maneuverability



SU-40 Egress Maneuverability

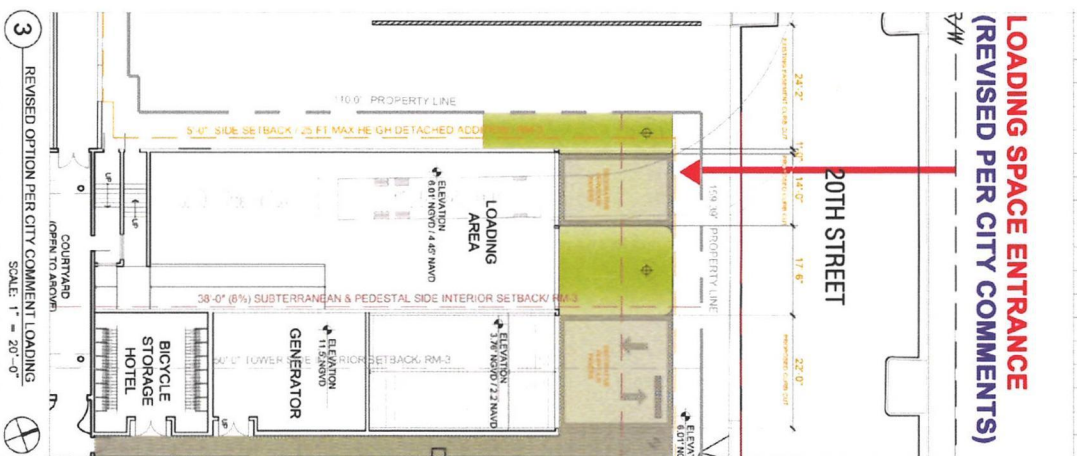
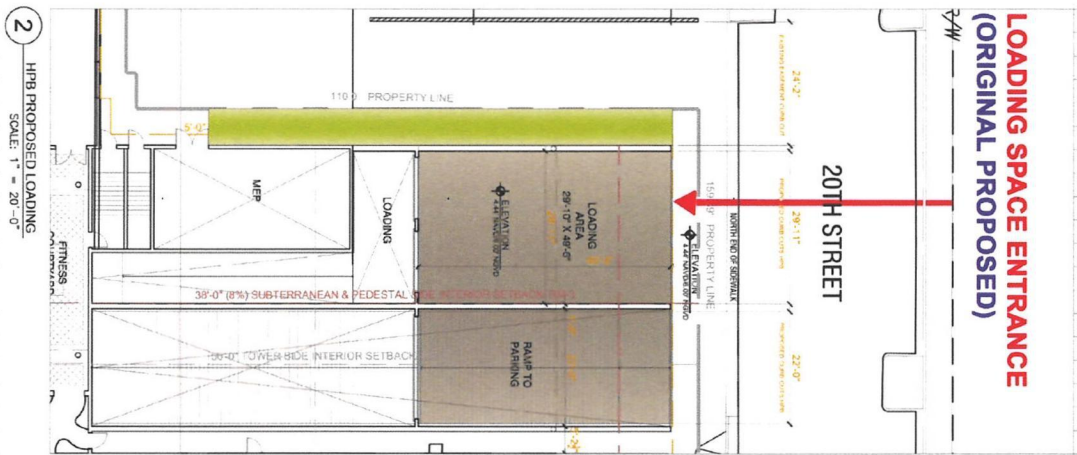
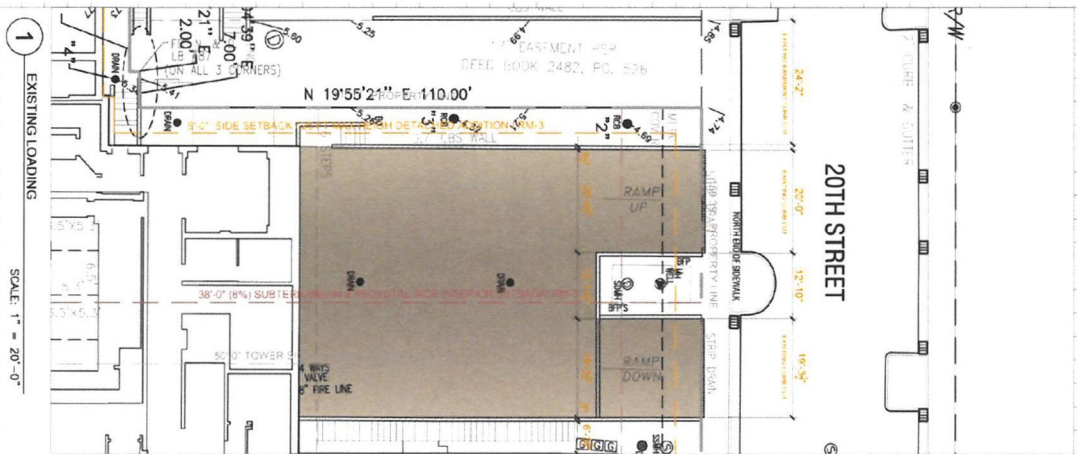


**REVISED LOADING
AREA PLAN**

NO MANEUVERABILITY STUDY

**CURB CUT REDUCED
FROM 29 FEET
TO 14 FEET**

(FROM APPLICANT'S 12/14/22 SUPPLEMENTAL PLANS)



<p>ENLARGED CHROMWELL LOADING</p> <p>DATE: 1/24/2022 TIME: 11:57:07 AM USER: jk</p> <p>SCALE: 1" = 20'-0"</p> <p>PROJECT: A3.21</p>	<p>Project Information</p> <p>Client: KOBEL 1901 Collins Ave Miami Beach, FL 33139</p> <p>Architect: SHoP ARCHITECTS 1901 Collins Ave Miami Beach, FL 33139</p> <p>Engineer: K&A R P 1901 Collins Ave Miami Beach, FL 33139</p>	<p>Site Information</p> <p>Site: 1901 Collins Ave Miami Beach, FL 33139</p> <p>Adjacent: 1901 Collins Ave Miami Beach, FL 33139</p>	<p>Design Team</p> <p>Architect: SHoP ARCHITECTS 1901 Collins Ave Miami Beach, FL 33139</p> <p>Engineer: K&A R P 1901 Collins Ave Miami Beach, FL 33139</p>	<p>Project Location</p> <p>1901 Collins Ave Miami Beach, FL 33139</p> <p>Adjacent: 1901 Collins Ave Miami Beach, FL 33139</p>
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