





Interoffice Memorandum

DATE: October 14, 2021

TO: Mayor Jerry L. Demings
-AND-
County Commissioners

FROM: Jon V. Weiss, P.E., Director
Planning, Environmental and Development
Services Department 

CONTACT PERSON: Eric Raasch, DRC Chairman
Development Review Committee 
Planning Division
(407) 836-5523

SUBJECT: October 26, 2021 – Public Hearing
Applicant: Brooks A. Stickler, Kimley-Horn & Associates, Inc.
Nadeen Tanmore II Planned Development
Case # CDR-21-04-134 / District 1

The Nadeen Tanmore II Planned Development (PD) is located north of World Center Drive and east of International Drive. The existing PD development program allows for 100,000 square feet of commercial uses, 481 hotel rooms, 897 timeshares, and a convention center hotel consisting of 1,618 hotel rooms and 200,000 square feet of convention meeting space.

Through this PD substantial change, the applicant is seeking to realign the lot orientation within Parcel 4. Additionally, six waivers are requested from Orange County Code relating to building heights, compatibility with adjacent agriculturally-zoned properties, and parking requirements.

On August 25, 2021, the Development Review Committee (DRC) recommended approval of the request, subject to conditions. A community meeting was not required for this request.

Finally, the required Specific Project Expenditure Report and Relationship Disclosure Forms have been completed in accordance with the requirements of Article X, Chapter 2, Orange County Code, as may be amended from time to time, and copies of these and the PD/LUP may be found in the Planning Division for further reference.

ACTION REQUESTED: **Make a finding of consistency with the Comprehensive Plan (CP) and approve the substantial change to the Nadeen Tanmore II Planned Development / Land Use Plan (PD/LUP) dated “Received August 30, 2021”, subject to the conditions listed under the DRC Recommendation in the Staff Report. District 1**

Attachments
JVW/EPR/jsh

CASE # CDR-21-04-134

Commission District: # 1

GENERAL INFORMATION

APPLICANT	Brooks A. Stickler; Kimley-Horn & Associates, Inc.
OWNER	Martni Global LLC
PROJECT NAME	Nadeen-Tanmore II Planned Development
PARCEL ID NUMBER(S)	35-24-28-5844-00-090 (affected parcel only)
TRACT SIZE	130.32 gross acres (overall PD) 37.00 gross acres (affected parcel only)
LOCATION	Generally located north of World Center Drive, east of International Drive
REQUEST	A PD substantial change to realign the lot orientation within Parcel 4. Additionally, six waivers are requested from Orange County Code relating to building heights, compatibility with adjacent agriculturally-zoned properties, and parking requirements.
PUBLIC NOTIFICATION	A notification area extending beyond one thousand (1000) feet was used for this application [Chapter 30-40(c)(3a) of the Orange County Code requires 300 feet]. sixteen (16) notices were mailed to those property owners in the notification buffer area. A community meeting was not required for this application.

IMPACT ANALYSIS

Special Information

The Nadeen-Tanmore II PD was originally approved on September 19, 1991, along with an associated Development of Regional Impact (DRI), and was comprised of 960 hotel rooms, 64,390 square feet of associated hotel retail, 480 restaurant seats, and 15,760 square feet of tourist commercial uses. Today, through various amendments and the DRI rescission, the PD includes development entitlements for 100,000 square feet of commercial uses, 481 hotel rooms, 897 timeshares, and a convention center hotel consisting of 1,618 hotel rooms and 200,000 square feet of convention meeting space.

Through this PD substantial change, the applicant is seeking to realign the lot orientation within Parcel 4. Additionally, six waivers from Orange County Code are requested related to building heights, compatibility with adjacent agriculturally-zoned properties, and parking requirements.

Land Use Compatibility

The proposed PD substantial change would not adversely impact any adjacent properties or result in an incompatible land use pattern.

Comprehensive Plan (CP) Consistency

The subject property has an underlying Future Land Use Map (FLUM) designation of ACMU (Activity Center Mixed Use). The Nadeen-Tanmore II PD was approved in 1991 and includes uses such as tourist commercial, hotel, and retail. The proposed PD substantial change is consistent with this designation and all applicable CP provisions; therefore, the request is consistent with the Comprehensive Plan.

Overlay Ordinance

The subject property is located within the Tourist Commercial Signage Overlay District.

Rural Settlement

The subject property is not located within a Rural Settlement.

Joint Planning Area (JPA)

The subject property is not located within a JPA.

Environmental

An Orange County Conservation Area Determination CAD-18-10-153 was completed with a certified survey of the conservation area boundary approved by the Environmental Protection Division (EPD) on 11/4/2019.

Development of the subject property shall comply with all state and federal regulations regarding wildlife and plants listed as imperiled species (endangered, threatened, or species of special concern). The applicant is responsible to determine the presence of these concerns and to verify and obtain, if necessary, any required habitat permitting of the U.S. Fish and Wildlife Service (USFWS) and the Florida Fish & Wildlife Conservation Commission (FWC).

Transportation Planning

Under the Developer's Agreement titled Tanmore South DRI approved by the Board of County Commissioners on October 1, 1996 and recorded at OR Book/Page 5194/2526 the Tanmore Corporation conveyed 50 feet of Right-of-Way along the northern border of the property for Lake Bryan Beach Boulevard with the exception of a parcel in the middle of the property which was not owned by the Developer at that time. The conveyance was accepted by the Board of County Commissioners on December 30, 1997 and the Developer received Road Impact Fee credits in the amount of \$195,000. The First Amendment to Developer's Agreement approved by the BCC on December 4, 2007 and recorded at 9535/2349 provides that the 50-feet along the missing parcel would be dedicated under the same terms as the original agreement as well as providing for additional Right-of-Way along the intersection of International Drive and Lake Avenue Extension. The agreement further contemplates the vacation of certain Right-of-Way by the County to the Developer and providing a ten-foot strip of property along the eastern boundary to provide access for the neighboring parcel. In addition, in order to obtain approval for the Petition to Vacate, the property owner will construct an unpaved access in the Right-of-Way dedicated to Orange County to allow for the neighboring property owners to have access to their properties. All obligations have been met by all parties.

The Roadway Agreement Committee has reviewed a Proportionate Share Agreement for Parcel 4 of the Nadeen-Tanmore II PD Winter Garden-Vineland Road ("Agreement") by and between Martni Global, LLC and Orange County for a proportionate share payment in the amount of \$146,085. Pursuant to Section 163.3180(5)(h), Florida Statutes, an applicant may mitigate capacity deficiencies by entering into a Proportionate Share Agreement and contributing a proportionate share payment. The Proportionate Share Payment is due within 90 days of the effective date of this Agreement. The Agreement follows the recommendation of the Roadway Agreement Committee providing for the mitigation of road impacts for fifteen deficient trips on the road segment of Winter Garden-Vineland Road from Osceola County Line to SR 536/World Center Drive in the amount of \$9,739 per trip. The Roadway Agreement Committee approved the Proportionate Share Agreement on June 19, 2019.

Community Meeting Summary

A community meeting was not required for this request.

Schools

Orange County Public Schools (OCPS) reviewed the request and determined that it will not impact public school capacity.

Parks and Recreation

Orange County Parks and Recreation staff reviewed the Change Determination Request but did not identify any issues or concerns.

Specific Project Expenditure Report and Relationship Disclosure Forms

The original Specific Project Expenditure Report and Relationship Disclosure Form are currently on file with the Planning Division.

ACTION REQUESTED

Development Review Committee (DRC) Recommendation – (August 25, 2021)

Make a finding of consistency with the Comprehensive Plan and approve the Nadeen-Tanmore II Planned Development / Land Use Plan (PD/LUP), dated "August 30, 2021", subject to the following conditions:

1. Development shall conform to the Nadeen-Tanmore II Planned Development dated "Received August 30, 2021," and shall comply with all applicable federal, state, and county laws, ordinances, and regulations, except to the extent that any applicable county laws, ordinances, or regulations are expressly waived or modified by any of these conditions. Accordingly, the PD may be developed in accordance with the uses, densities, and intensities described in such Land Use Plan, subject to those uses, densities, and intensities conforming with the restrictions and requirements found in the conditions of approval and complying with all applicable federal, state, and county laws, ordinances, and regulations, except to the extent that any applicable county laws, ordinances, or regulations are expressly waived or modified by any of these conditions. If the development is unable to achieve or obtain desired

uses, densities, or intensities, the County is not under any obligation to grant any waivers or modifications to enable the developer to achieve or obtain those desired uses, densities, or intensities. In the event of a conflict or inconsistency between a condition of approval and the land use plan dated "Received August 30, 2021," the condition of approval shall control to the extent of such conflict or inconsistency.

2. This project shall comply with, adhere to, and not deviate from or otherwise conflict with any verbal or written promise or representation made by the applicant (or authorized agent) to the Board of County Commissioners ("Board") at the public hearing where this development received final approval, where such promise or representation, whether oral or written, was relied upon by the Board in approving the development, could have reasonably been expected to have been relied upon by the Board in approving the development, or could have reasonably induced or otherwise influenced the Board to approve the development. In the event any such promise or representation is not complied with or adhered to, or the project deviates from or otherwise conflicts with such promise or representation, the County may withhold (or postpone issuance of) development permits and / or postpone the recording of (or refuse to record) the plat for the project. For purposes of this condition, a "promise" or "representation" shall be deemed to have been made to the Board by the applicant (or authorized agent) if it was expressly made to the Board at a public hearing where the development was considered and approved.
3. Pursuant to Section 125.022, Florida Statutes, issuance of this development permit by the County does not in any way create any rights on the part of the applicant to obtain a permit from a state or federal agency and does not create any liability on the part of the County for issuance of the permit, or any other development order, if the applicant fails to obtain requisite approvals or fulfill the obligations imposed by a state or federal agency or undertakes actions that result in a violation of state or federal law. Pursuant to Section 125.022, the applicant shall obtain all other applicable state or federal permits before commencement of development.
4. Developer / Applicant has a continuing obligation and responsibility from the date of approval of this land use plan to promptly disclose to the County any changes in ownership, encumbrances, or other matters of record affecting the property that is subject to the plan, and to resolve any issues that may be identified by the County as a result of any such changes. Developer / Applicant acknowledges and understands that any such changes are solely the Developer's / Applicant's obligation and responsibility to disclose and resolve, and that the Developer's / Applicant's failure to disclose and resolve any such changes to the satisfaction of the County may result in the County not issuing (or delaying issuance of) development permits, not recording (or delaying recording of) a plat for the property, or both.
5. Property that is required to be dedicated or otherwise conveyed to Orange County (by plat or other means) shall be free and clear of all encumbrances, except as may be acceptable to County and consistent with the anticipated use. Owner / Developer shall provide, at no cost to County, any and all easements required for approval of a project or necessary for relocation of existing easements, including any existing

facilities, and shall be responsible for the full costs of any such relocation prior to Orange County's acceptance of the conveyance. Any encumbrances that are discovered after approval of a PD Land Use Plan shall be the responsibility of Owner / Developer to release and relocate, at no cost to County, prior to County's acceptance of conveyance. As part of the review process for construction plan approval(s), any required off-site easements identified by County must be conveyed to County prior to any such approval, or at a later date as determined by County. Any failure to comply with this condition may result in the withholding of development permits and plat approval(s).

6. This project shall comply with the County's International Drive Activity Center Comprehensive Plan requirement for a 15-foot transit easement and a separate 20-foot landscape, pedestrian and utility easement needed for future roadway improvements. The easement areas required shall be conveyed concurrently at time of platting or dedicated to the County via separate instrument prior to Development Plan Approval.
7. All acreages identified as conservation areas and wetland buffers are considered approximate until finalized by a Conservation Area Determination (CAD) and a Conservation Area Impact (CAI) Permit. Approval of this plan does not authorize any direct or indirect conservation area impacts.
8. Prior to mass grading, clearing, grubbing or construction, the applicant is hereby noticed that this site must comply with habitat protection regulations of the U.S. Fish and Wildlife Service (USFWS) and the Florida Fish & Wildlife Conservation Commission (FWC).
9. The developer shall obtain water, wastewater, and reclaimed water service from Orange County Utilities subject to County rate resolutions and ordinances.
10. The proposed development is adjacent to the existing and permitted Orange County Western Effluent Disposal site (WEDS). The design and permitting (stormwater, etc.) for the proposed development shall take into account the groundwater mounding produced by the adjacent WEDs when loaded at full permitted capacity and during wet weather conditions. At the time of construction plan submittal, provide calculations and documentation certifying that the design complies with this condition.
11. Prior to construction plan approval, hydraulic calculations shall be submitted to Orange County Utilities demonstrating that proposed and existing water, wastewater, and reclaimed water systems have been designed to support all development within the PD.
12. The following waivers from Orange County code are granted:

- a. A waiver from Section 38-1258(a) is requested along the eastern and southern boundaries of the proposed multifamily development to allow a multifamily building with a maximum height of sixty-seven (67) feet/five (5) stories with a minimum setback of 25 feet from single-family zoned property in lieu of the single-story height requirement where the multifamily buildings are located within one hundred (100) feet of single-family zoned property.
 - b. A waiver from Section 38-1258(b) is requested along the eastern and southern boundaries of the proposed multifamily development to allow a multifamily building with a maximum height of sixty-seven (67) feet/five (5) stories with a minimum setback of 25 feet from single-family zoned property along the southern and eastern boundaries in lieu of the varying building height where the multifamily buildings are located between one hundred plus (100+) feet to one hundred and fifty (150) feet of single-family zoned properties.
 - c. A waiver from Section 38-1258(c) is requested along the eastern and southern boundaries of the proposed multifamily development to allow a multifamily building with a maximum height of sixty-seven (67) feet/five (5) stories with a minimum setback of 25 feet from single-family zoned property located along the eastern and southern boundaries in lieu of forty (40) feet/ three (3) stories in height where the multifamily buildings are located within one hundred and fifty (150) feet of single-family zoned properties.
 - d. A waiver from Section 38-1258(d) is requested along the eastern and southern boundaries of the proposed multifamily development to allow a multifamily building with a maximum height of sixty-seven (67) feet/five (5) stories with a minimum setback of 25 feet from single-family zoned property located along the eastern and southern boundaries in lieu of forty (40) feet/ three (3) stories in height.
 - e. A waiver from Section 38-1258(e) is requested along the eastern and southern boundaries of the proposed multifamily development to allow for parking and other paved areas for multi-family development to be located 7.5 feet from any single-family zoned property in lieu of twenty-five (25) feet.
 - f. A waiver from Section 38-1476 to provide 1.69 parking spaces per unit in lieu of the required 1.83 spaces per unit.
13. Except as amended, modified, and / or superseded, the following BCC Conditions of Approval, dated June 4, 2019, shall apply:
- a. Unless the property is otherwise vested or exempt, the applicant must apply for and obtain a Capacity Encumbrance Letter (CEL) prior to construction plan submittal and must apply for and obtain a Capacity Reservation Certificate (CRC) prior to issuance of the initial certificate of occupancy. Nothing in this condition and nothing in the decision to approve this development plan shall be construed as a guarantee that the applicant will be able to satisfy the requirements for obtaining a CEL or a CRC.
 - b. The following Education Condition of Approval shall apply:

- 1) Developer shall comply with all provisions of the Capacity Enhancement Agreement entered into with the Orange County School Board as of April 9, 2019.
 - 2) Upon the County's receipt of written notice from Orange County Public Schools that the developer is in default or breach of the Capacity Enhancement Agreement, the County shall immediately cease issuing building permits for any residential units in excess of the zero (0) residential units allowed under the zoning existing prior to the approval of the PD zoning. The County may again begin issuing building permits upon Orange County Public Schools' written notice to the County that the developer is no longer in breach or default of the Capacity Enhancement Agreement. The developer and its successor(s) and/or assign(s) under the Capacity Enhancement Agreement, shall indemnify and hold the County harmless from any third party claims, suits, or actions arising as a result of the act of ceasing the County's issuance of residential building permits.
 - 3) Developer, and its successor(s) and/or assign(s) under the Capacity Enhancement Agreement, agrees that it shall not claim in any future litigation that the County's enforcement of any of these conditions are illegal, improper, unconstitutional, or a violation of developer's rights.
 - 4) Orange County shall be held harmless by the developer and its successor(s) and/or assign(s) under the Capacity Enhancement Agreement, in any dispute between the developer and Orange County Public Schools over any interpretation or provision of the Capacity Enhancement Agreement.
 - 5) Prior to or concurrently with the County's approval of the plat, documentation shall be provided from Orange County Public Schools that this project is in compliance with the Capacity Enhancement Agreement.
- c. Residential uses are prohibited on Parcels 1, 2, and 3. Multi-family uses shall be permitted within PD Parcel 4 only, not to exceed 30% of the total PD area.
 - d. Pole signs and billboards shall be prohibited. All other signage shall comply with Chapter 31.5 of the Orange County Code (Tourist Commercial Standards).
 - e. Outside sales, storage, and display shall be prohibited.
14. Except as amended, modified, and / or superseded, the following BCC Conditions of Approval, dated July 10, 2018, shall apply:
- a. Tree removal/earthwork shall not occur unless and until construction, plans for the first Preliminary Subdivision Plan and/or Development Plan with a tree removal and mitigation plan have been approved by Orange County.

15. Except as amended, modified, and / or superseded, the following BCC Conditions of Approval, dated April 5, 2011, shall apply:

- a. A waiver from Section 38-1300 of the Orange County Code is granted to allow an increase in height for hotel and timeshare uses from 200 feet to 250 feet for Parcel 4, to be consistent with the previously approved 250-foot height on the balance of the PD.
- b. The following conditions were previously included in the Sierra Land DRI and Nadeen-Tanmore II DRI Development Orders which are being rescinded concurrently with this change. These former ongoing conditions are now incorporated into the Nadeen-Tanmore II PD and are listed as follows:
 - 1) Tourist Commercial uses shall be those consistent with Policies 1.1.3 and 1.1.6 of the International Drive Activity Center Element of the Orange County Comprehensive Plan.
 - 2) The Developer shall comply with the Orange County Concurrency Management System, as amended, for any non-vested trips. The Developer shall comply with the Orange County Transportation Impact Fee Ordinance, as amended.
 - 3) In the interest of safety, and to promote alternative forms of transportation, the Developer will provide a safe and convenient system for cyclist and pedestrian circulation on-site. On-site bicycle and pedestrian systems shall be connected at Project entrances with the ten (10) foot wide bicycle/pedestrian facility along World Center Drive. The provision of showers and lockers for employees is strongly encouraged at places of employment.
 - 4) Transit passenger shelters and transit parking bays shall be constructed where necessary to augment and facilitate the operation and comfortable use of off-site public transit. The Developer shall provide for bus shuttle systems which service hotel patrons and shall operate between the Project and Orlando International Airport and between the Project and major area tourist attractions. The Developer shall make known to employees that the Nadeen-Tanmore II area is served by an existing transit and ridesharing program operated by LYNX. Current transit and ridesharing information shall be prominently displayed in all public gathering areas, in employment centers and in commercial center areas.
- c. The following provisions will be required of the Developer:
 - 1) Appropriate signage and sufficient area lighting at all bus stops and shelter locations.
 - 2) Transit schedule and information displays will be provided, at a minimum, at each on-site bus stop.

- 3) Maintenance of transit amenities shall be the responsibility of the property owner or the property owner's association.
 - 4) Details, standards, and phasing of all transit amenity provisions must be approved by LYNX.
 - 5) Pedestrian movement between bus stops shall not exceed 1,300 feet.
- d. In order to minimize the impacts to the roadway network, parcels within the Project shall, subject to environmental constraints, be interconnected to adjacent developments to the maximum extent feasible as determined by the County. This access is for ease of movement and maintenance of International Drive traffic capacity and specifically is not intended to provide a primary means of ingress and egress to any other property. Any adjacent development must have separate means of ingress/egress to Orange County standards. The Developer shall cooperate with any County supported efforts to continue roadways from or through the site with other roadway facilities that are hereafter endorsed by Orange County.
- e. To minimize dependence on ground irrigation and to promote retention of wildlife habitat, xeriscape principles of landscaping using native vegetation (see xeriscape plant guide published by the South Florida Water Management District) shall be utilized in areas not subject to reclaimed water irrigation. Ecologically viable portions of natural upland plant communities shall be preserved and maintained in their original state to the greatest practicable extent.
- f. Access rights along International Drive shall be dedicated to Orange County, except at approved locations.
- g. Left turn lanes shall be provided along International Drive at the median openings.
- h. The stormwater management system shall be designed to comply with the Orange County Code and the requirements of the South Florida Water Management District.
- i. The Developer shall establish and implement an inspection and maintenance program for all components of the surface water management system for the project site, to include schedules for the performance of: (a) Stormwater facility operating inspection on a regular basis (e.g., quarterly) and following major rainfall event (e.g. ½ inch of rainfall) for the removal of excessive sediment, debris, or other flow obstructions; (b) routine maintenance activities (e.g., mowing, trash removal, etc.); (c) ongoing education programs for maintenance staff personnel regarding the correct usage of application rates for fertilizers and chemicals (e.g., herbicides near the stormwater management facilities), the removal of noxious weeds and retention of desirable aquatic vegetation, and correct procedures for other maintenance/landscaping related activities

which have the potential for adversely affecting surface or groundwater quality conditions on the project site.

- j. The Developer will incorporate additional water quality treatment and/or water management methods into the project's surface water management system to correct or mitigate any degradation if the measures implemented by the Developer are found to be ineffective or adversely impacting water quality/quantity conditions on or downstream of the project site.
- k. The Developer shall ensure that if a property owners' association is proposed to assume operation and maintenance responsibilities for the surface water management system, then the proposed property owners' association shall be created with defined duties and responsibilities regarding the operation and maintenance of the surface water management system. The property owners' association shall have sufficient legal authority and power to establish the mandatory collection of fees and/or assessments from all property owners for use in financing the operation and replacement and maintenance of property's surface water management system.
- l. The Development Guidelines of the International Drive Activity Center shall apply to the subject property for future development. Existing development on Parcels 1 and 2 shall not be required to meet the current International Drive standards for paving setback and parking orientation.
- m. To ensure consistency with the International Drive Activity Center Plan and the Comprehensive Plan, if the housing linkage program is in place prior to development plan approval, development shall be conditioned upon the development of residential units within the area designated as Activity Center Residential on the Future Land Use Map unless a developer's agreement addressing housing linkage is executed.
- n. Parcel owners shall be required to participate in a property owners' association upon its creation.
- o. The property is located within the International Drive Activity Center as adopted in the Orange County Comprehensive Plan and, as such, development on the property shall be subject to:
- p. A funding mechanism, such as but not limited to an MSTU(s) and/or MSBU(s), for financing underground utilities and lighting along major roads, including International Drive;
- q. A funding mechanism, such as but not limited to an MSTU(s) and/or MSBU(s), for financing maintenance of landscaping on public right-of-way, including International Drive.
- r. Sidewalks shall be a minimum of ten (10) feet wide along all major roads.
- s. Electrical distribution lines shall be underground.

- t. Fire flow shall meet Orange County standards.
- u. The following Trip Equivalency Matrix, included on the PD Land Use Plan, may be utilized for the exchange of commercial square footage, hotel/motel units, or timeshare units from one approved land use to another in accordance with the formulas or exchange rates contained in the Equivalency Matrix. The exchange rates and formulas contained in the Equivalency Matrix ensure that the total traffic impacts of the PD will remain unchanged or below the maximum impacts approved.

	Hotel (1 Room)	Timeshare (1 Unit)	Tourist Commercial (KSF)	Multi- Family	ADT Rate
Hotel (1 Room)	N/A	1.417	0.324	1.671	12.23
Multi- Family	0.599	0.848	0.194	N/A	7.32
Timeshare (1 Unit)	0.706	N/A	0.229	1.179	8.63
Tourist Commercial (KSF)	3.087	4.374	N/A	5.157	37.75

PREVIOUS BOARD OF COUNTY COMMISSIONERS ACTION (June 4, 2019)

Upon a motion by Commissioner VanderLey, seconded by Commissioner Moore, and carried by a vote of 6 to 0, the Board of County Commissioners voted to make a finding of consistency with the Comprehensive Plan; and approve a substantial change request to add 100,000 square feet of commercial uses, 341 multi-family residential units, and 300 hotel rooms and assign them to Parcel 4; add additional access points to Parcels 3 and 4; to revise the Parcel 4 area from 36.26 acres to 37 acres per an updated survey; and to delete the 50' building setback from existing onsite drainage ponds.

CDR-21-04-134

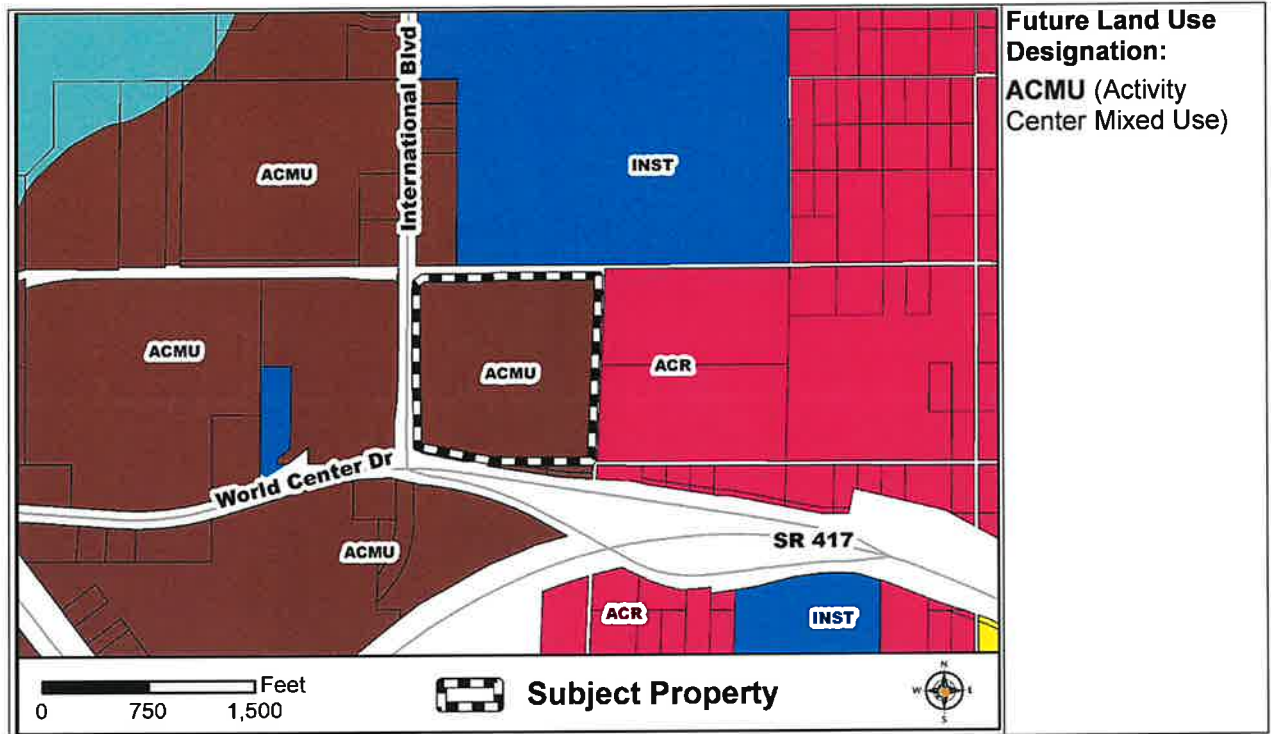


 Subject Property

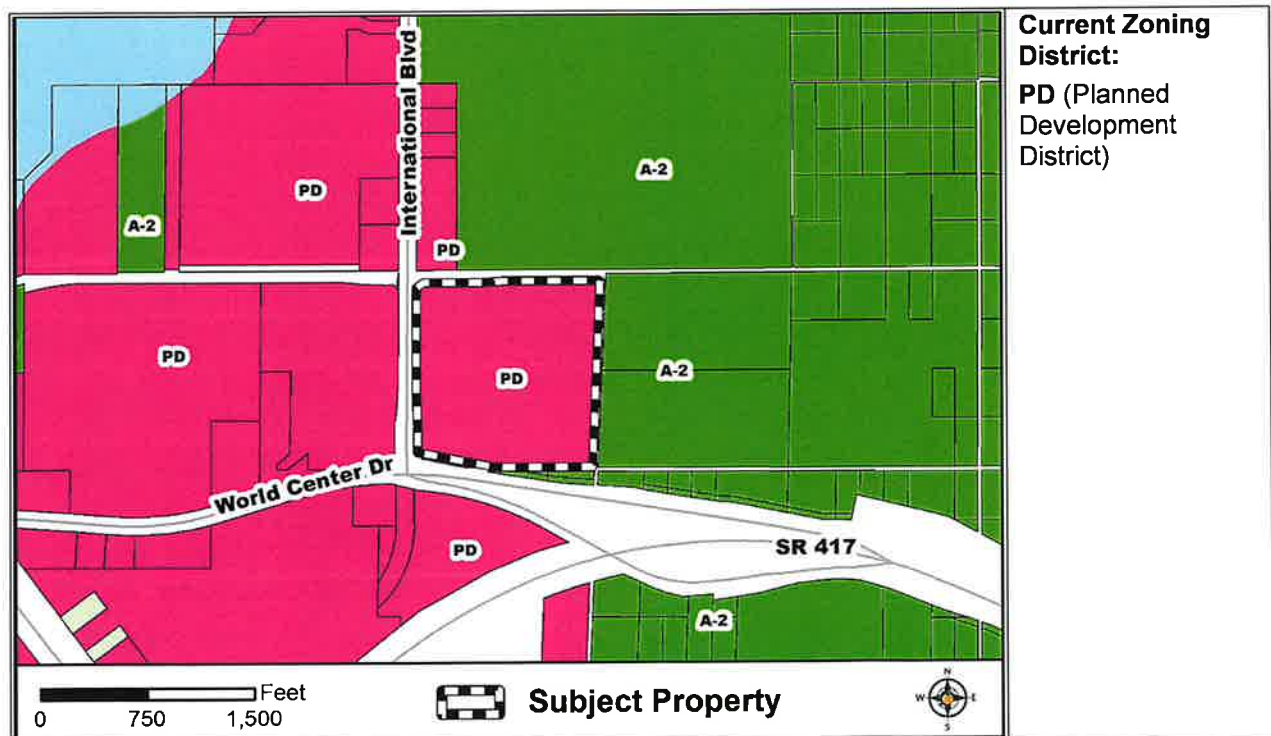


1 inch = 700 feet

FUTURE LAND USE – CURRENT



ZONING - CURRENT



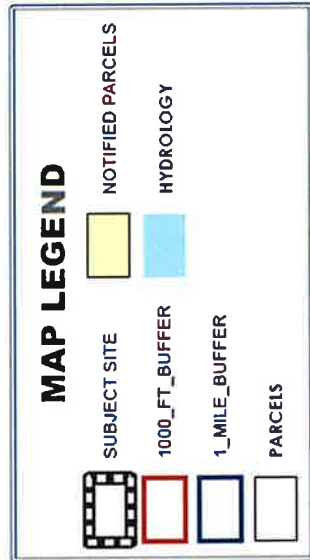
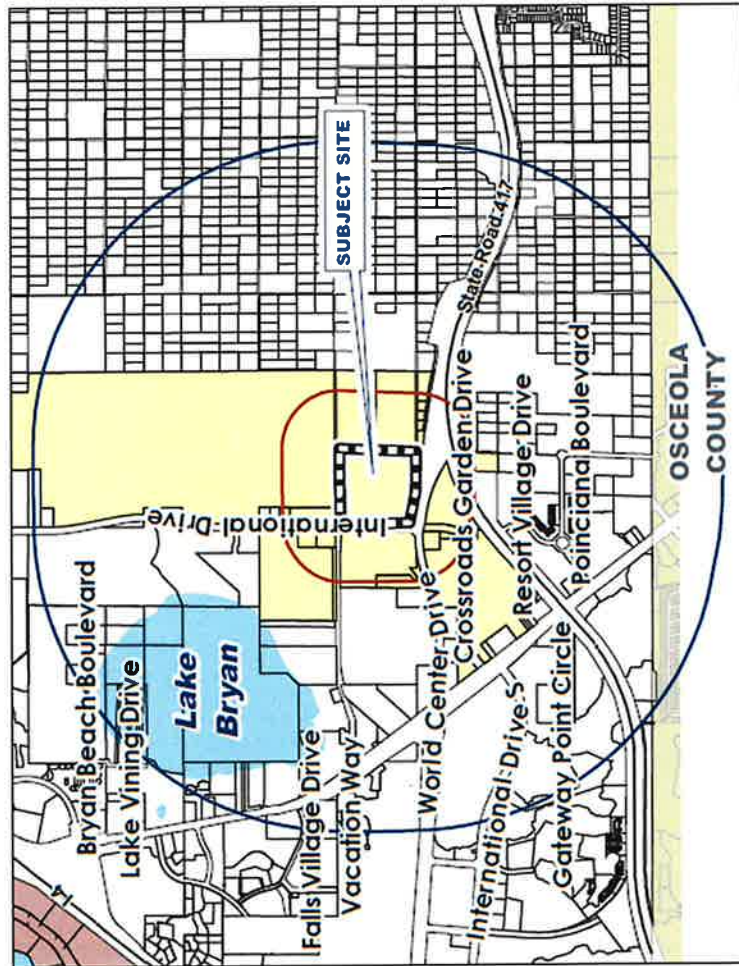
Nadeen-Tanmore II PD / LUP



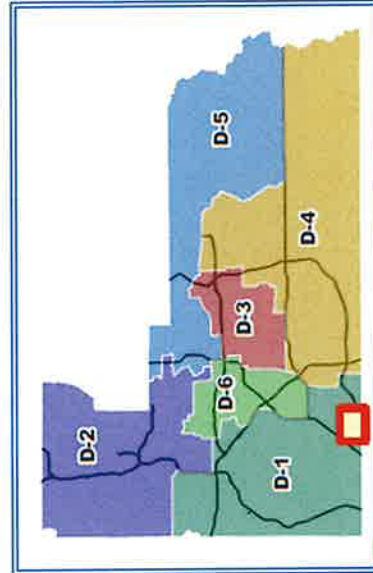


Public Notification Map

Nadeen-Tanmore II PD_CDR-21-04-134



BUFFER DISTANCE: 1000
 # OF NOTICES: 16



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