



MEMORANDUM

To: Town of Vienna
From: Nelson\Nygaard
Date: February 4, 2022
Subject: Technical Memo#3: Definition, Illustration and Assessment of Policy and Program Alternatives for Reform of Existing Code Requirements

Based on the data and plans analyzed in Memo 1 and the lessons learned from peers in Memo 2, this memo defines a set of recommended policy and program reform options to meet Town goals and objectives. This memo also includes analysis and evaluation of TDM Policy strategies that are applicable to the Town of Vienna.

Parking is an effective tool for supporting the community goals articulated in Vienna's comprehensive plan. Outdated or little-known parking provisions of a county or city's municipal or zoning code can often inhibit desired developments and infrastructure, hinder equitable growth, and increase vehicle miles traveled and traffic. Parking policy changes can be difficult to discuss, engage, and act on, as parking provision and management can seem both esoteric and challenging to some bystanders because of the longstanding assumption that people in Vienna drive to every destination.

Momentum to rethink parking is growing across the country and in Vienna. While better management of on-street parking became more widely adopted within the last decade, changes to off-street parking policy (arguably most critical for climate and affordability goals) have lagged. However, an uptick in parking policy changes across the country and region has occurred in recent years.

The following is a set of recommended policy and program reform options, tailored to meet Town goals and objectives.

KEY PARKING REFORMS

Vienna's inflexible and high minimum parking requirements compared to peers, as described in Memos 1 & 2, work to stifle desired changes to Vienna's developed areas, in particular on Maple Ave., Church St., and nearby properties. As demonstrated in earlier Memos, these requirements are in almost all cases much higher than current demonstrated peak demand. Established trends point to continued reduction in demand, which will further exacerbate the oversupply of parking. Key reforms to parking regulations and complementary policies can ameliorate the current situation and set Vienna up to respond to continuing changes in transportation patterns.

Along with adopting specific changes as detailed in following sections, Vienna should make two structural changes that support all updated requirements.

Commit to Timely Updates to Parking Requirements

Vienna is planning to conduct a detailed review of the current parking supply via a forthcoming Town-wide parking study. With this new data, Vienna will have an opportunity to further hone existing parking requirements, especially in the Maple Avenue and Church Street neighborhood. The Town should integrate the results of that study with recommendations contained in this Memo. Given the increasingly fast pace of change in transportation behavior – for personal travel, as well as drop-off/pickup demand – the Town should commit to revisit parking regulations every five years, perhaps on schedule with the regular Comprehensive Plan review required by the Commonwealth of Virginia. This revisit should include any new local data collected – for example, as part of a TDM agreement with new development – as well as national trends. While it wouldn't necessarily result in changes to regulations and other requirements, it would give staff, elected officials, and citizens confidence that their approach remained reasonable and workable.

Condense Land Use/Requirement Ratio Tables

Reducing the number of land use categories and land use units with distinct parking-requirement ratios can help facilitate the reuse and re-tenanting of existing developments, by reducing the likelihood that a change of use (especially between types of retail or commercial uses or from a retail use towards a service use) will trigger the need to add parking or a potentially burdensome review of existing parking provision for adequate match of requirements. Specifying ratios only for uses with meaningfully distinct demand-generation rates can thus reduce this cost barrier to repurposing existing buildings and spaces, a vital need for keeping urban districts vibrant and active as market trends and use patterns evolve. See the next section for a suggestion of how land use categories may be consolidated.

RECOMMENDED CHANGES TO PARKING REGULATIONS

Reduce Minimum Parking Requirements to Fit Demand

Vienna can meet current and likely future demand for parking, while reducing if not eliminating unnecessary parking that reduces affordability and impedes new development. Some peer jurisdictions have eliminated minimum parking requirements—in whole, in specific districts, or for specific uses—allowing individual owners and developers to decide based on market forces how much off-street parking their project needs to be viable. Vienna could pursue this tack as well. For example, Vienna could eliminate minimum requirements for office parking in the Church Street Vision plan area and other targeted redevelopment areas, or for affordable housing as part of larger mixed-use projects.

Alternatively, or in conjunction with the approach described above, Vienna should lower minimum parking requirements for many use categories in key districts.

The Town should change the requirements for restaurant and related entertainment uses from a per-seat approach to one considering square footage alone. This should facilitate changes in use especially among restaurant configurations.

Table 1 Off-Street Parking Minimums

Building Use	Minimum On-Site Parking Requirement
Single-unit residential	2 spaces per unit
2 or 3-unit residential	1 space per unit
> 4 unit residential	1 space per unit, plus 1 space per 4 units for short-term visitor parking
General commercial including office and retail	0 spaces for first 1,000 square feet of gross floor area; 1:300 thereafter. Off-site parking within 1,000 feet, with appropriate documentation, may count toward minimum.
Restaurant	1 space per 100 square feet of patron/seating area; auxiliary seating (e.g., terrace) exempt. Off-site parking within 1,000 feet, with appropriate documentation, may count toward minimum.
Other uses (including civic and industrial)	Remain as in current code

Reduce Parking Requirements via Shared Parking

Recognizing that providing parking can be a significant burden to redevelopment in the Church St. zoning district consistent with Town goals, the Town can allow shared parking on one site or for two or more properties to meet parking requirements. The Town Council could be authorized to approve a reduction in the number of required spaces provided on-site up to 66% for two uses that share the same parking area, whether on the same lot or abutting lots. Approval could be subject to conditions such as the following:

- A shared parking agreement (for two or more uses), contract, lease, or licensing agreement is recorded on file at Town Hall, and updated annually.
- Some portion of the shared parking facility lies within 1,000 feet from a regularly used entrance to each building served by the arrangement.
- Sufficient space is set aside for the remainder of the required spaces.
- The calculation of required spaces follows a specified formula to ensure that only non-overlapping demand is accommodated in shared spaces:
 - a. For each use, calculate the minimum parking requirement as normal: the minimum parking ratio for that use, multiplied by the size of the use (measured appropriately as square footage, number of units, etc.).
 - b. For each time period, multiply the results of a. above by the appropriate time-of-day factor from Table 2.
 - c. For each time period, sum the results of b. above across all uses.

Policy and Program Alternatives for Reform of Existing Code Requirements
Town of Vienna, Virginia

- d. The time period with the highest overall sum represents peak demand and therefore is the minimum required number of shared spaces.
- Note that the specified percentages could be adjusted over time and in response to specific experience and new data.

Table 2 Shared-Parking Calculations: Percent of Peak Demand by Use by Time of Day

Use	Weekday 8am – 6pm	Weekday 6pm - Midnight	Weekday Midnight – 8am	Weekend 6am – 6pm	Weekend 6pm - Midnight
Residential	60%	100%	100%	80%	100%
Office/Industrial	100%	10%	5%	5%	5%
Commercial/Retail	90%	80%	5%	100%	60%
Restaurant	70%	100%	70%	80%	100%
Entertainment	30%	100%	5%	80%	100%
Institutional (non-religious)	100%	40%	5%	10%	10%
Religious Institution	20%	40%	5%	100%	50%

Example

A proposed development containing multiple uses is calculated using the standard minimum parking ratios to require 50 unshared parking spaces: 10 for retail, 10 for office, and 30 for residential. Using the shared-parking calculations in b. above results in the following:

Table 3 Example Shared-Parking Calculations

Use	Unshared Requirement	Weekday 8am – 6pm	Weekday 6pm - Midnight	Weekday Midnight – 8am	Weekend 6am – 6pm	Weekend 6pm - Midnight
Residential	30	18 (=30 * 60%)	30 (= 30 * 100%)	30 (= 30 * 100%)	24 (= 30 * 80%)	30 (= 30 * 100%)
Office/Industrial	10	10 (=10 * 100%)	1 (=10 * 10%)	0.5 (=10 * 5%)	0.5 (=10 * 5%)	0.5 (=10 * 5%)
Commercial/Retail	10	9 (=10 * 90%)	8 (=10 * 80%)	0.5 (=10 * 5%)	10 (=10 * 100%)	6 (=10 * 60%)
Restaurant	0	0	0	0	0	0
Entertainment	0	0	0	0	0	0
Institutional (non-religious)	0	100%	40%	5%	10%	10%
Religious Institution		20%	40%	5%	100%	50%

As in c. above, for each time period, sum the required shared parking across all uses:

- Weekday daytime: $18 + 10 + 9 = 37$ spaces
- Weekday evening: $30 + 1 + 8 = 38$ spaces
- Weekday overnight: $30 + 0.5 + 0.5 = 31$ spaces
- Weekend daytime: $24 + 0.5 + 10 = 34.5$ spaces
- Weekend overnight: $30 + 0.5 + 6 = 36.5$ spaces

Per step d. above, peak demand occurs during the weekday evening time period, at 38 spaces. Using this method clarifies that by sharing parking across uses, the minimum required shared parking for this proposed development should be 38 spaces. By requiring 24% fewer spaces, the Town can ensure the development meets expected demand for parking while avoiding building 12 spaces that would remain empty at even the busiest times of day.

Reduce Parking Requirements for Shared Mobility

Reduction in vehicle parking requirements for residential buildings can be given when spaces are provided for shared vehicles and further, by ensuring a car-sharing service has committed to occupying them. Typically, this is articulated as a ratio of vehicle spaces reduced per designated car-share space which a recognized car-share provider has agreed to occupy. Given Vienna's context, an allowance of about 4 spaces reduced per shared vehicle could be considered as part of a shared parking agreement as described above. Alternatively, a set number of carshare spaces can be specified per dwelling unit, attached to a percentage reduction to the overall minimum. In this case, Vienna would specify that, for example, a 20-unit residential building would be encouraged to provide 1 shared vehicle space and allowed a reduction in 4 spaces as a result.

Because this reduction is based on stated commitment to occupy spaces with shared cars, and because the impact of shared-vehicle access on resident vehicle ownership rates has been well established¹, it is not as common to cap how much the parking requirement may be reduced through this option, particularly for residential uses.

Similarly, a reduction in vehicle parking requirements for commercial buildings can be allowed in mixed-use or employment zones if bikeshare stations are provided.

Consider Establishing Parking Maximums

Parking maximums institute a cap on the number of parking spaces that can be built in certain areas. This policy can be used to reduce systemic overbuilding of parking, encouraging more walkable and sustainable multimodal urban design patterns, and can

¹ Cervero R., Golub, A., & Nee, B. (2007). City carshare: Longer-term travel demand and car ownership impacts. Transportation Research Record, 1992, 70–80.

ter Schure, J., Napolitan, F., & Hutchinson, R. (2012). Cumulative impacts of carsharing and unbundled parking on vehicle ownership and mode choice. Transportation Research Record, 2319, 96–104.

support infill development. A key feature of determining where to apply parking maximums is parking utilization. Areas with consistently low parking utilization may be an indication of excess parking supply where parking maximums could be implemented. If Vienna pursues a coordinated redevelopment plan in any part of the Maple Ave. corridor, it could consider parking maximums along with it.

Parking maximums for redevelopment in Vienna (of, for example, 150% of the minimum requirement) could allow for additional parking to be built on a case-by-case basis through additional special permits or via an in-lieu fee paid per space in excess of the per-site cap to promote flexibility.

Parking maximums can also be paired with shared parking programs as an alternative to overbuilding parking. Flexible parking maximums that exclude shared parking spaces can encourage developers to build parking that can meet parking needs in off-peak hours.

In districts where parking is well-utilized, parking maximums are likely not appropriate. Larger redevelopment parcels should rather be incentivized to provide more parking than the minimum, and to share it with nearby uses. This applies to the Church St. district in Vienna.

Credit Off-Site Parking

As noted in Memo 1, the Town of Vienna allows off-site parking credits for commercial and industrial uses by Town approval in code Section 18-131. Spaces no further than 400 feet from the principal building's entrance must be recorded in an agreement with the property owner that includes an illustration of spaces and approved by Town Council.

The Town of Vienna can expand this policy to include crediting off-site parking for residential uses. The off-site parking agreement to reserve access to private or public parking facilities may be restricted to certain hours or be maintained 24/7. If limited to overnight hours for residents, these shared agreements can both help meet parking requirements in new developments and better utilize existing parking assets across the entire town. The maximum distance of 400 feet could also be expanded to 1,000 feet (about a 4-minute walk) or more with the provision of wayfinding signage for drivers and pedestrians.

On-street parking along the frontage of a development and available on-street parking within the same distance radius may also be allowed to count towards overall parking requirements for the building. Available on-street parking can be determined through Town surveys or developer-funded surveys.

Provide for Electric Vehicle Charging

While designating spaces for Electric Vehicle (EV) charging does not help to reduce unnecessary parking spaces, it can ensure that some of the provided spaces are ready for continued growth in the EV market. Parking spaces may be reserved for electric

vehicles and/or electric vehicle charging. This can be done through required electric vehicle parking capacity and minimum electric vehicle parking requirements. A typical ordinance includes recommendations or requirements on the proportion of parking spaces that must be designated as electric vehicle charging stations. An ordinance may also require spaces to be made “charger-ready” by having appropriate electrical connections, but not requiring the installation of chargers pending development of the market.

The Town of Vienna should require one energized charger for every 10 parking spaces. This space will count towards minimum parking requirements and is not an additional space.

Require Short- and Long-Term Bicycle Parking

Bicycle parking is a safe and convenient space for the storage of a bicycle in the form of a rack, locker, or storage area. Providing bicycle parking encourages people to use their bicycles as an alternative to single-occupancy vehicles. A typical ordinance includes recommendations or requirements on the proportion of bike parking spaces that must be designated per vehicle spaces, per square feet of gross floor area, or per residential unit. Bicycle parking requirements can include minimum parking requirements, design standards, and long- and short-term requirements.

Table 4 Bicycle Parking Requirements

Building Use	Short-term Bike Parking Spaces	Long-term Bike Parking Spaces
1-3 unit residential	-	-
> 4 unit residential	1.5 spaces per dwelling unit	1 space per 2 dwelling units
Office/Medical/Service	0.20 spaces per 1,000 sq. ft. of gross floor area	0.50 spaces per 1,000 sq. ft. of gross floor area
Restaurant/Retail	0.50 spaces per 1,000 sq. ft. of gross floor area	0.20 spaces per 1,000 sq. ft. of gross floor area
Institutional	1 per 2,500 sq. ft.	1 per 2,500 sq. ft.
Other	0.10 per 1,000 sq. ft.	0.10 per 1,000 sq. ft.

Given the rapid increase in the consumer market for electric bicycles, requirements for long-term spaces could also include providing charging infrastructure.

Bicycle parking requirements can also reduce vehicle parking requirements. Typically, this is articulated as a ratio of one vehicle-space reduced per X number of bicycle parking spaces provided above minimum bicycle parking requirements. The maximum reduction in vehicle spaces is typically capped at a certain percentage of minimum vehicle parking requirements.

Ensure supportive parking design

To achieve a vibrant streetscape with safe and attractive walking conditions, Vienna should consider adopting code provisions that directly address the design of parking facilities. As described in Technical Memo #2, Saugus, Massachusetts, leverages its zoning code to do so, with the following language:

“Projects shall enhance the pedestrian environment and bicycle circulation by providing safe and convenient pedestrian access into plans for existing buildings as well as new construction and parking areas and should be designed in concert with landscaping plans so as to minimize the number and size of curb cuts and provide sidewalks along roads where possible

1. There shall be clear grade separated pedestrian connections between all parking areas and all buildings. A raised, landscaped sidewalk will be constructed through the main parking lot to facilitate safe pedestrian travel through the site. The sidewalks required within planting strips may be used to meet this requirement.

2. Continuous internal pedestrian walkways, no less than 5 feet in width, shall provide a direct link from the public sidewalk or street right-of-way to the principal customer entrance of all principal retail establishments on the site. Walkways shall also connect focal points of pedestrian activity such as, but not limited to, transit stops, street crossings, and building and store entry points. The sidewalks required within planting strips may be used to meet this requirement.

3. Unobstructed sidewalks, no less than 6 feet in width, shall be provided along the full length of the building along any façade featuring a customer entrance, and along any façade abutting public parking areas. Along facades with building entrances, the required 6-foot-wide sidewalk area shall be set back from the façade by a 3 foot area that either contains planting beds or additional sidewalk width.

4. All internal pedestrian walkways and crosswalks shall be distinguished from driving surfaces through the use of durable, low maintenance surface materials such as pavers, bricks or scored concrete to enhance pedestrian safety and comfort.

5. Buildings and sidewalks shall be handicapped accessible.”

At a minimum, Vienna should adopt language that ensures connectivity between parking lots and minimizes future curb-cuts and driveway connections directly from parking lots onto Maple Avenue. Jenkintown, Pennsylvania, as described in Technical Memo #2, achieves this via a code requirement:

*“Interconnected **parking** areas. New **parking** areas on abutting nonresidential lots should be interconnected by access driveways. Each nonresidential lot shall provide cross-access easements for its **parking** areas and access driveways, guaranteeing access to adjacent lots for future **connections**. Interconnections shall be logically placed and easily identifiable to ensure convenient traffic flow.”*

COMPLEMENTARY POLICIES

On-site pickup/drop-off

On-site pickup and drop-off is a complementary parking and curb management strategy to make efficient use of existing parking while limiting oversupply. On-site pickup and drop-off zones allow for frequent parking turnover so the curbside remains available for use. This strategy can take two forms: passenger pickup and drop-off and commercial pickup and drop-off.

Passenger pickup and drop-off zones can be limited to specific land uses or zones.

Commercial pickup and drop-off zones facilitate efficient delivery of goods and services in urban areas lacking off-street loading facilities. With increased reliance on package, parcel, and food delivery, commercial pickup and drop-off zones have become more essential.

The designation of on-site pickup/drop-off spaces can be particularly effective in places where parking is well-utilized, like Church Street. Used in conjunction with shared and/or off-site parking, this approach can reduce frustration and congestion.

Loading

The current code requires designated loading spaces for almost all buildings except for residential. Other sections of the code forbid loading spaces in required front yards (Sec. 18-266), require access driveways of 14'-22' (Sec. 18-103), restrict hours of operation in some zones (Sec. 18-105), and delineate allowable materials (Sec. 18-134).

Sec. 18-132. - Loading space.

Every hospital, institution, commercial or industrial building hereafter erected shall provide indoor or outdoor space for the loading and unloading of goods and materials. Such space shall be at least 25 feet in depth; such space, if located within a building, shall be at least 15 feet in height; such space also shall have a width of at least 15 feet for every 50 feet or fraction thereof of building width.

Spaces for loading may be compatible with spaces for on-site pickup/drop-off as described above. For proposed development of relatively small size, even mixed-use developments, the need for a designated on-site loading space can be met by time-restricting pickup/drop-off spaces during significant, longer-duration loading events such as move-ins. For larger proposed developments, more frequent and/or longer-duration loading events can have more of an impact on the surrounding transportation system and nearby neighboring uses. In such cases, the Town should require an indoor loading dock, ideally with access from a driveway or alley and not the public street. Such projects could also be required to have indoor refuse pickup, for similar reasons.

TRANSPORTATION DEMAND MANAGEMENT POLICY

Vienna has the opportunity to go beyond parking-specific approaches to consider more broadly how to support safe, convenient, sustainable multimodal travel in keeping with Town goals. An integrated approach, termed transportation demand management (TDM), requires new development to go beyond a conventional traffic analysis and reduce impacts on the transportation network by supporting the development and provision of programs, infrastructure, and incentives to reduce driving. TDM programs are designed to make it easier for people to choose to get around by walking, biking, and taking transit. A developer commits to a TDM plan as a condition of approval, often in conjunction with a reduction in minimum parking requirements.

A TDM Policy for Vienna should reach multiple, diffused travel markets. Tailoring a TDM policy to the Town requires making it broadly applicable. Over 93% of employed residents commute to jobs outside of town, and close to 95% of workers in town live outside Vienna.² The town's position within the broader, urbanized DC region means that its dispersed pattern of home origins and employment destinations limit Vienna's direct influence. Indeed, the dispersed pattern of origins and destinations, more broadly speaking, is a leading cause of traffic in the town and regionally.

Objectives of a TDM Policy

- Incentivize TDM strategies and programs that are tailored to and best suited to the town's unique corridors, residential neighborhoods, employment centers, and transit access.
- Allow for participation of large and small developers/property managers.
- Be easy to understand and use – especially important for smaller businesses and entities that should participate for full impact.
- Retain flexibility so that programs can match ongoing improvements in transportation infrastructure, such as future transit and bike network improvements.
- Be easy to implement and monitor by Town officials.
- Help residents and employees reduce their transportation costs, to help offset regional increases in housing costs.

TDM Requirement

TDM components most commonly appear in a city's development code and ordinance as part of site plan review or special permit approvals. At minimum, requiring applicants to describe their planned TDM measures as part of traffic impact statements can encourage their implementation, even if not required in and of themselves.

² OnTheMap, US Census Bureau, LEHD Origin-Destination Employment Statistics (2018)

A workable approach balances confidence that the TDM measures work with the flexibility to meet different site contexts. Points-based TDM programs use a credit system where projects of a certain minimum size must meet a target number of points by committing to a combination of TDM measures that reduce the number of driving trips generated by the site. This program is meant to reduce both outbound and inbound trips related to the development project. The target number of points can be tied to parking reductions granted by the Planning Board and dependent on the development land use.

The intention behind the menu of TDM measures is to give developers the flexibility to create a TDM program that best fits their needs. TDM measures may have two or more possible point levels, depending on the aggressiveness of implemented measures. Similarly, projects in the Church Street Vision plan area and other targeted redevelopment areas may be automatically granted points based on their location to incentivize infill development that can take advantage of existing infrastructure.

Property owners must submit ongoing monitoring reports intended to prove results from implemented programs and update the submitted plans if not in compliance.

TDM Policy Eligibility Frameworks

TDM Policy requirements can be applicable to all new developments according to specific eligibility criteria, determined through levers like land uses and project size.

Land use categories, similar to consolidated parking requirement categories, can be used to define the TDM requirements deemed to be most appropriate and effective depending on the project type. The following categories are suitable for this purpose:

- **Residential** – Land uses that are predominantly the origins of commute or discretionary trips
- **Office/School/Medical** – Land uses that are predominantly the destinations of daily commuters and generate long-term parking demand
- **Retail/Restaurant/Visit** – Land uses that predominantly generate short-term discretionary-trips
- **Other** – Land uses that typically generate moderate or minimal parking demand and/or are typically minimally responsive to TDM mitigation efforts, such as:
 - Light industrial buildings
 - Wholesale warehouse or self-storage
 - Research, development, and testing laboratories
 - Utility buildings or public service buildings

With the exception of projects exempt from local zoning and development ordinances, for example federal or state projects, developments or redevelopment projects can be required to prepare and implement a Transportation Demand Management plan, provided they meet an applicability threshold. Types of TDM Plans can be distinguished by the scale of development, such as a Large Scale project versus a Small Scale project.

A Small Scale TDM Plan can be required for development proposed at a scale that meets or surpasses thresholds such as the following before instead triggering a Large Scale TDM Plan. Any development or redevelopment smaller than those that meet the thresholds would be exempt, except for other requirements specified in the zoning code, such as minimum bike parking spaces.

- ≥10,000 square feet of new construction, or
- ≥10 new or added housing units, or
- ≥20,000 square feet of changed land uses, or
- ≥15 new or additional parking spaces, or
- ≥15 new or additional peak hour trips³

A **Large Scale TDM Plan** could be required for development proposed at a scale that meets or surpasses the following thresholds:

- ≥30,000 square feet of new construction, or
- ≥30 new or added housing units, or
- ≥40,000 square feet of changed land uses, or
- ≥30 new or additional parking spaces, or
- ≥30 new or additional peak hour trips⁴

Policy Option Lessons

Key lessons of TDM policies and requirements from municipalities across the country include:

- To achieve Town goals, it is helpful to establish site/project specific goals that hold project owners/developers accountable to their commitments, with flexibility to adjust plans reflective of what has or has not worked to date.
- Penalties for noncompliance serve as a strong incentive for developers or property owners to ensure that they are meeting their vehicle trip reduction targets consistently over time. Effective penalties include a financial penalty, or maintenance of the Certificate of Occupancy.
- While project owners/developers are held accountable with these ambitious TDM policies, flexibility in meeting requirements is key to ensure that developers still want to pursue their projects through construction.
- Point systems bring transparency to the site plan review process for developers and can incentivize TDM measures with the most benefit to Vienna specifically.

³ Trip generation shall use standards and methodologies promulgated by the most recent editions of the Institute of Transportation Engineers or Urban Land Institute manuals, or another appropriate source approved by the Town.

⁴ Trip generation shall use standards and methodologies promulgated by the most recent editions of the Institute of Transportation Engineers or Urban Land Institute manuals, or another appropriate source approved by the Town.

Policy and Program Alternatives for Reform of Existing Code Requirements
Town of Vienna, Virginia

- The need for dedicated staff to monitor and enforce programs on an annual or triannual basis may create difficulty for Vienna if there are many development proposals per year subject to reporting requirements.

DRAFT