

CITY OF LEWISTON
PLANNING BOARD MEETING
Monday, April 10, 2017 – 5:30 P.M.
City Council Chambers – First Floor
Lewiston City Building
27 Pine Street, Lewiston, ME

AGENDA

I. ROLL CALL

II. ADJUSTMENTS TO THE AGENDA

III. CORRESPONDENCE

IV. PUBLIC HEARINGS:

An application submitted by Sebago Technics on behalf of Maine Veterans Homes for an amendment to the South Park Subdivision to subdivide the lot at 15 Challenger Drive into two lots.

V. OTHER BUSINESS:

- a) Discussion about form based codes.
- b) Any other business Planning Board Members may have relating to the duties of the Lewiston Planning Board.

VI. READING OF THE MINUTES: Motion to adopt the March 27, 2017 draft minutes

VI. ADJOURNMENT



CITY OF LEWISTON

Department of Planning & Code Enforcement

TO: Planning Board
FROM: David Hediger, City Planner
DATE: April 6, 2017
RE: April 10, 2017 Planning Board Agenda Item IV(a)

An application submitted by Sebago Technics on behalf of Maine Veterans Homes for an amendment to the South Park Subdivision to subdivide the lot at 15 Challenger Drive into two lots.

Sebago Technics on behalf of Maine Veterans Homes has submitted an application for an amendment to the South Park Subdivision to subdivide the lot at 15 Challenger Drive into two lots. On February 28, 2011 the Planning Board approved the construction of a 32,200 square Veterans Affairs community based outpatient clinic at this site. At that time, Lots C and D of the subdivision were merged into one 17.4 acre lot with a portion leased from Maine Veterans Homes to the U.S. Department of Veterans Affairs for the clinic. Maine Veterans Homes is now looking to split the lot back into two lots. Lot C will consist of the clinic and 8.19 acres. Lot D will remain a vacant developable lot consisting of 9.21 acres. Both lots are located in the Urban Enterprise (UE) district and meet all space and bulk requirements.

Staff has no concerns with the proposed amendment and recommends approval.

ACTIONS NECESSARY:

Make a motion pursuant to Article XIII, Section 4 and Section 5 of the Zoning and Land Use Code to approve a request by Sebago Technics on behalf of Maine Veterans Homes for an amendment to the South Park Subdivision to subdivide the lot at 15 Challenger Drive into two lots.



March 31, 2017
99220

David Hediger
City Planner/Deputy Director Planning and Code Enforcement
City of Lewiston
27 Pine Street
Lewiston, ME 04240-7201

The 7th Amended South Park Subdivision – Challenger Drive
Parcel ID RE00013372

Dear David:

On behalf of Ron Herbert of the Maine Veteran's Homes, I have prepared the enclosed application, plan and attachments. The Maine Veteran's Homes would like to revise the lot line between Lots C and D that they own to coincide with the lease line recorded after the latest site plan approval.

Since the sixth amended subdivision there was a site plan approved for construction of a facility on Lot C. The construction has been completed and a lease was granted that crossed the common line between Lots C and D that are both owned by the Maine Veteran's Homes. The attached seventh amended subdivision is simply to include all of the lease area within Lot C. Lot D is currently a vacant lot.

I have included the following attachments:

- Development Review Application
- Locus Deed (Book 7776 Page 37)
- 7th Amended Subdivision Plan
- 7th Amended Subdivision Plan with Aerial photograph background
- The Original South Park Subdivision Plan (Plan Book 31 Page 196)
- The First Amended South Park Subdivision Plan (Plan Book 34 Page 21)
- The Sixth Amended South Park Subdivision Plan (Plan Book 39 Page 172)
- Check with the application fee

I look forward to any review comments you may have and attending the Planning Board meeting on April 10th. Thank you for your time and your consideration of this project.

SEBAGO TECHNICS, INC.

A handwritten signature in black ink that reads "Matthew W. Ek".

Matthew W. Ek, PLS
Director of Survey/GIS Advancement

MWE/:mwe
Enc.

cc. Ron Herbert, Maine Veteran's Homes



Development Review Application

City of Auburn Planning and Permitting Department
City of Lewiston Department of Planning and Code Enforcement



PROJECT NAME: SOUTH PARK SUBDIVISION AMENDMENT

PROPOSED DEVELOPMENT ADDRESS: CHALLENGER DRIVE

PARCEL ID#: RE00013372

REVIEW TYPE: Site Plan/Special Exception Site Plan Amendment
 Subdivision Subdivision Amendment

PROJECT DESCRIPTION: ADJUST SUBDIVISION LOT LINE BETWEEN LOTS D & C

CONTACT INFORMATION:

Applicant

Name: Ron Herbert, Maine Veteran's Homes

Address: 460 CIVIC CENTER DR
AUGUSTA MAINE 04330

Zip Code: 04330

Work #: 1-800-278-9494

Cell #:

Fax #:

Home #:

Email:

Project Representative

Name:

Address:

Zip Code

Work #:

Cell #:

Fax #:

Home #:

Email:

Property Owner

Name: Maine Veteran's Homes

Address: 460 CIVIC CENTER DR
AUGUSTA MAINE 04330

Zip Code: 04330

Work #:

Cell #:

Fax #:

Home #:

Email:

Other professional representatives for the project (surveyors, engineers, etc.),

Name: Matthew Ek, Sebago Technics, Inc

Address: 75 John Roberts Rd, Suite 1A
South Portland, Maine

Zip Code: 04106

Work #: 207-200-2058

Cell #:

Fax #:

Home #:

Email: mek@sebagotechnics.com

PROJECT DATA

The following information is required where applicable, in order to complete the application

IMPERVIOUS SURFACE AREA/RATIO

Existing Total Impervious Area NA sq. ft.
Proposed Total Paved Area NA sq. ft.
Proposed Total Impervious Area NA sq. ft.
Proposed Impervious Net Change NA sq. ft.
Impervious surface ratio existing NA % of lot area
Impervious surface ratio proposed NA % of lot area

BUILDING AREA/LOT COVERAGE

Existing Building Footprint NA sq. ft.
Proposed Building Footprint NA sq. ft.
Proposed Building Footprint Net change NA sq. ft.
Existing Total Building Floor Area NA sq. ft.
Proposed Total Building Floor Area NA sq. ft.
Proposed Building Floor Area Net Change NA sq. ft.
New Building NA (yes or no)
Building Area/Lot coverage existing NA % of lot area
Building Area/Lot coverage proposed NA % of lot area

ZONING

Existing _____
Proposed, if applicable URBAN ENTERPRISE

LAND USE

Existing NA _____
Proposed _____

RESIDENTIAL, IF APPLICABLE

Existing Number of Residential Units _____
Proposed Number of Residential Units NA _____
Subdivision, Proposed Number of Lots _____

PARKING SPACES

Existing Number of Parking Spaces NA _____
Proposed Number of Parking Spaces NA _____
Required Number of Parking Spaces _____
Number of Handicapped Parking Spaces _____

ESTIMATED COST OF PROJECT \$0.00

DELEGATED REVIEW AUTHORITY CHECKLIST

SITE LOCATION OF DEVELOPMENT AND STORMWATER MANAGEMENT

Existing Impervious Area NA sq. ft.
Proposed Disturbed Area NA sq. ft.
Proposed Impervious Area NA sq. ft.

- 1. If the proposed disturbance is greater than one acre, then the applicant shall apply for a Maine Construction General Permit (MCGP) with MDEP.*
- 2. If the proposed impervious area is greater than one acre including any impervious area crated since 11/16/05, then the applicant shall apply for a MDEP Stormwater Management Permit, Chapter 500, with the City.*
- 3. If total impervious area (including structures, pavement, etc) is greater than 3 acres since 1971 but less than 7 acres, then the applicant shall apply for a Site Location of Development Permit with the City. If more than 7 acres then the application shall be made to MDEP unless determined otherwise.*
- 4. If the development is a subdivision of more than 20 acres but less than 100 acres then the applicant shall apply for a Site Location of Development Permit with the City. If more than 100 acres then the application shall be made to MDEP unless determined otherwise.*

TRAFFIC ESTIMATE

Total traffic estimated in the peak hour-existing (Since July 1, 1997) NA passenger car equivalents (PCE)

Total traffic estimated in the peak hour-proposed (Since July 1, 1997) NA passenger car equivalents (PCE)
If the proposed increase in traffic exceeds 100 one-way trips in the peak hour then a traffic movement permit will be required.

WARRANTY DEED

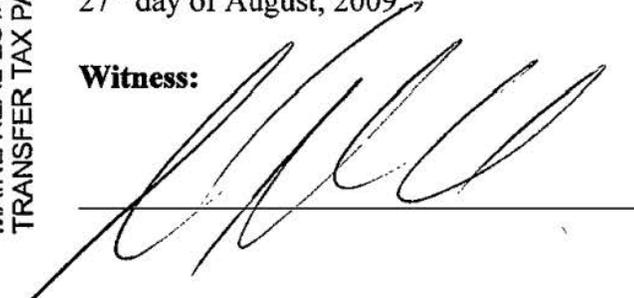
MRE, LLC, a Maine Limited Liability Company with mailing address at 50 Alfred Plourde Parkway, P.O. Box 1913, Lewiston, Maine 04241-1913 grants to **Maine Veterans' Homes**, a public body corporate with a mailing address at 5 Community Drive, Augusta, Maine 04330, with **Warranty Covenants**, a certain lot or parcel of land, together with any buildings situated thereon, located in **Lewiston**, County of **Androscoggin**, and State of **Maine**, as more fully described in Exhibit "A" attached hereto and made a part hereof.

In Witness Whereof, the undersigned has hereunto set its hand and seal effective this

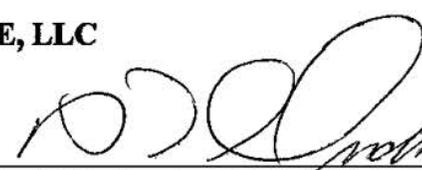
27th day of August, 2009

MAINE REAL ESTATE
TRANSFER TAX PAID

Witness:



MRE, LLC

By: 
David M. Gendron, Its Member

STATE OF MAINE
ANDROSCOGGIN, SS.

August 27, 2009

Then personally appeared the above-named **David M. Gendron** in his capacity as Member of **MRE, LLC** and acknowledged the foregoing instrument to be his free act and deed and the free act and deed of said Company.

Before me,

SEAL


Notary Public/Attorney-At-Law

Print Name: _____

My Commission Expires:  **NOTARY PUBLIC, MAINE**
EXPIRES MAY 11, 2011

EXHIBIT A

Being Lot C and Lot D as shown on a plan entitled "SUB-DIVISION PLAN, SOUTH PARK – REVISION 6" as recorded in the Androscoggin County Registry of Deeds in Book of Plans, Volume 39, Page 182; excepting and reserving to the City of Lewiston the following three easements: (i) the "40' Drainage Easement" as shown upon said Plan as located in part upon said Lot D; (ii) the "40' Sewer Easement" as shown on said the Plan as located in part upon Lot D; (iii) the "40' Sewer Easement" shown upon said Plan as located in part upon Lot C, reference, with respect to the aforesaid easements, being made to an instrument recorded in the said Registry in Book 2230, Page 193.

The Grantor also releases, without covenants of warranty or other covenants, that strip of land located on the northwesterly side of the aforesaid Lot D and labeled "Area to be conveyed to South Park Development Corporation by the City of Lewiston (1.59 acres)."

This conveyance is subject also to an easement granted by South Park Development Corporation to Central Maine Power Company and New England Telephone and Telegraph Company dated June 30, 1987 and recorded in said Registry in Book 2137, Page 139.

This conveyance is also subject to Protective Covenants and Restrictions for South Park dated October 25, 1996 and recorded in said Registry in Book 3692, Page 5.

Being the same premises conveyed to MRE, LLC pursuant to Warranty Deed from South Park Development Corporation dated September 12, 2001 recorded in the said Registry of Deeds at Book 4776, Page 309.

The above-described conveyance is made subject to the following right of first refusal:

In the event that the Grantee desires to sell all, or any part, of the above-described real estate (the "Real Estate") it shall first offer to sell the Real Estate to the Grantor at a purchase price of Ninety-Five Thousand and 00/100 Dollars (\$95,000.00) per buildable acre. The Grantee shall provide the Grantor with written notice of the Grantee's desire to sell the Real Estate. The Grantor shall have a period of thirty (30) days from the date of receipt of the notice from the Grantee within which to exercise its right of first refusal hereunder. In the event that the Grantor desires to exercise its right of first refusal, it shall so notify the Grantee in writing of its exercise within said thirty (30) day period. Closing on the acquisition of the Real Estate to be acquired by the Grantor shall occur not later than ninety (90) days subsequent to the date that the Grantor exercises its right of first refusal hereunder.

For purposes of notification, the addresses set forth on page 1 of this instrument shall constitute the notice addresses for the parties at issue, unless one party notifies the other in writing of an address change.

In the event that the Grantor exercises its right of first refusal, conveyance shall be made pursuant to Warranty Deed conveying good and marketable title, free of all encumbrances,

except such conventional utility easements and other restrictions as do not affect marketability.

In the event that the Grantor declines to exercise its right of first refusal, the Grantor shall notify the Grantee in writing of such declination. Provided there is no dispute between the Grantor and Grantee as to any such right of first refusal, and provided that the Grantor does not provide the Grantee with written confirmation of its declination to exercise its right of first refusal, the Grantee shall have the right to file an Affidavit with the Androscoggin County Registry of Deeds denoting such declination due to the Grantor's non-response, and the filing of such Affidavit shall constitute written declination by the Grantor.

ANDROSCOGGIN COUNTY
Tha M. Chaunard
REGISTER OF DEEDS

SOUTH PARK

OWNER: CITY OF LEWISTON, MAINE.
 CITY BUILDING PINE ST.
 LEWISTON, MAINE. 04240

SUBDIVIDER: LEWISTON PUBLIC WORKS DEPT.
 103 WILLOW ST.
 LEWISTON, MAINE. 04240

ENGINEER: LEWISTON ENGINEERING DIV.
 103 WILLOW ST.
 LEWISTON, MAINE 04240
 CHRISTOPHER C. BRANCH, P. E.
Christopher C. Branch

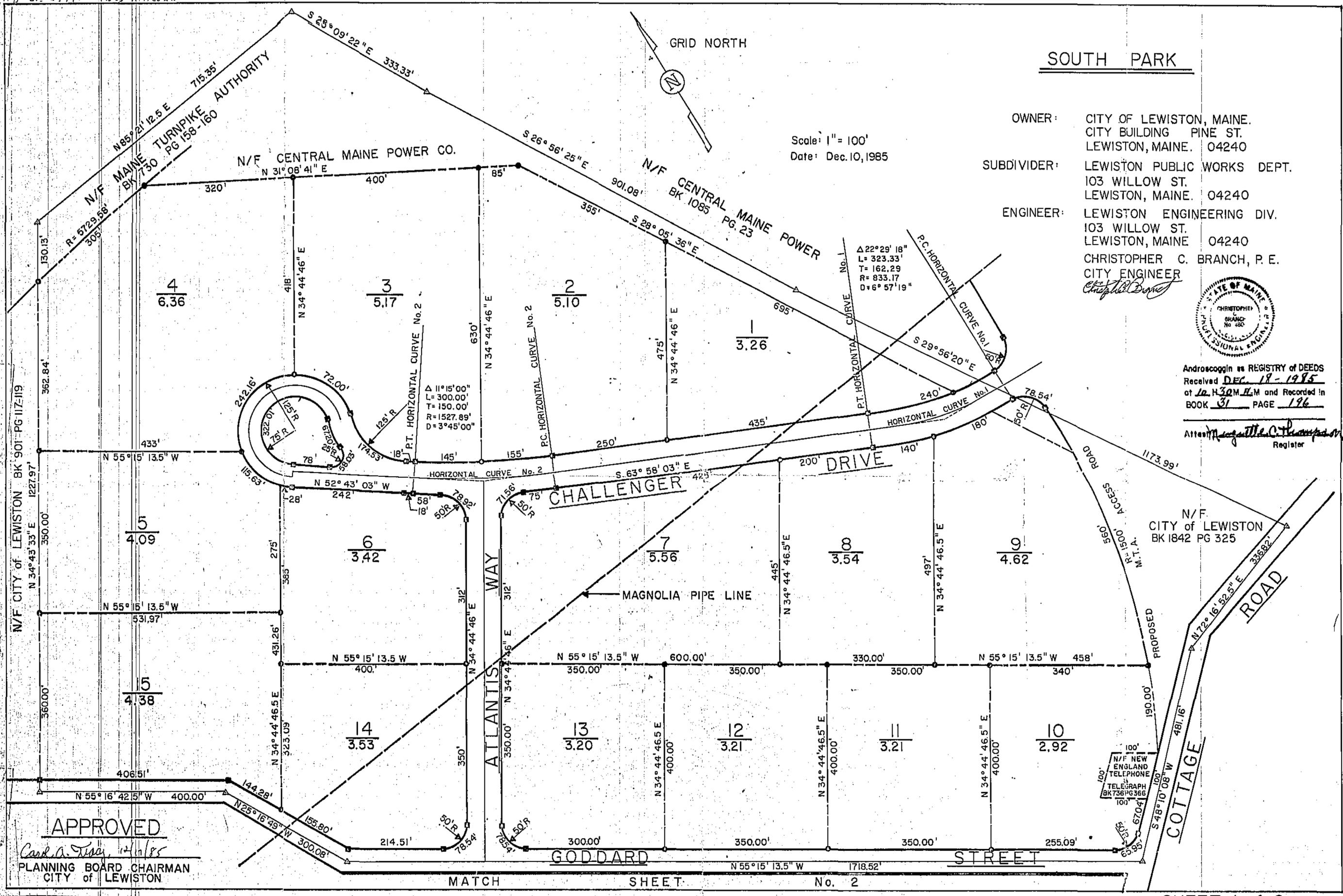


Androecoggin in REGISTRY of DEEDS
 Received DEC. 18 - 1985
 at 10 A.M. and Recorded in
 BOOK 31 PAGE 196

Matthew C. Thompson
 Register

Scale: 1" = 100'
 Date: Dec. 10, 1985

GRID NORTH



APPROVED
Carl A. Tracy
 PLANNING BOARD CHAIRMAN
 CITY of LEWISTON

CURVE DATA :		D-2	D-3	D-4	No. 2	No. 1
Δ		17° 32' 46.5"	19° 25' 17.7"	17° 31' 41.1"	10° 55' 36"	22° 29' 18"
D		6° 22' 00"	14° 19' 30"	8° 11' 08.6"	3° 38' 31"	6° 57' 26"
T		138.90'	68.45'	107.92'	150.48'	163.83'
E		10.65'	5.81'	8.27'	7.18'	16.13'
R		900.00'	400.00'	700.00'	1573.34'	824.05'
L		275.60'	135.58'	214.13'	300.02'	323.24'

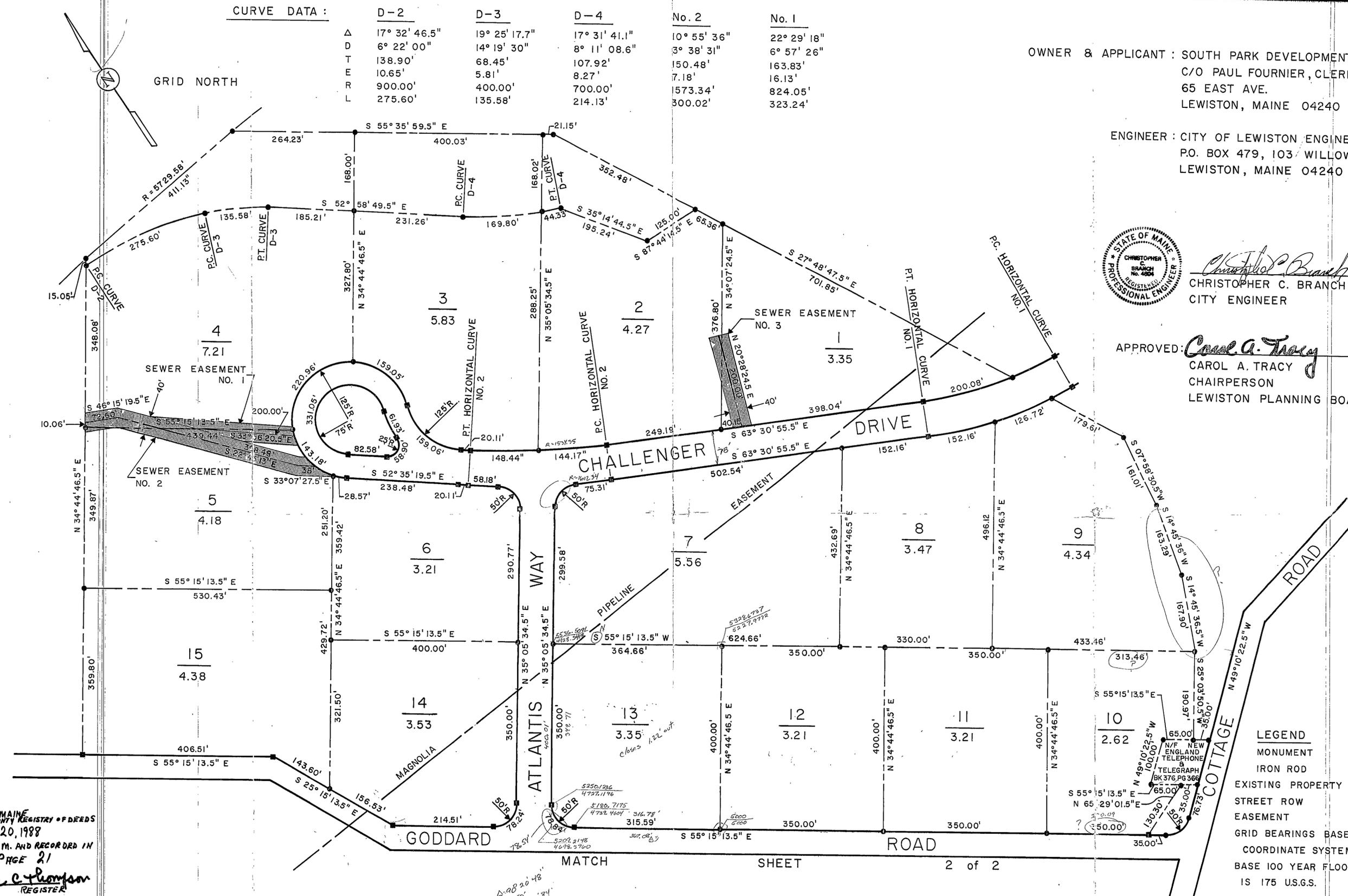
OWNER & APPLICANT : SOUTH PARK DEVELOPMENT CORP.
 C/O PAUL FOURNIER, CLERK
 65 EAST AVE.
 LEWISTON, MAINE 04240

ENGINEER : CITY OF LEWISTON ENGINEERING
 P.O. BOX 479, 103 WILLOW ST.
 LEWISTON, MAINE 04240



Christopher C. Branch
 CHRISTOPHER C. BRANCH, P.E.
 CITY ENGINEER
 6-9-88
 DATE

APPROVED: *Carol A. Tracy*
 CAROL A. TRACY
 CHAIRPERSON
 LEWISTON PLANNING BOARD
 7/20/88
 DATE



- LEGEND**
- MONUMENT
 - IRON ROD
 - EXISTING PROPERTY LINE
 - STREET ROW
 - EASEMENT
 - GRID BEARINGS BASED ON MAINE COORDINATE SYSTEM (WEST ZONE)
 - BASE 100 YEAR FLOOD ELEVATION IS 175 U.S.G.S.

AREA OF THE SUBDIVISION IS 95.94 ACRES

AUBURN MAINE
 ANDROSCOGGIN COUNTY REGISTRY OF DEEDS
 RECEIVED JUL 20, 1988
 AT 3:44 P.M. AND RECORDED IN
 B. 34- PAGE 21
 ATTEST: *Margaret C. Thompson*
 REGISTER

SOUTH PARK, REVISION 1

SCALE: 1" = 100'

2 of 2

SHEET 1 of 2

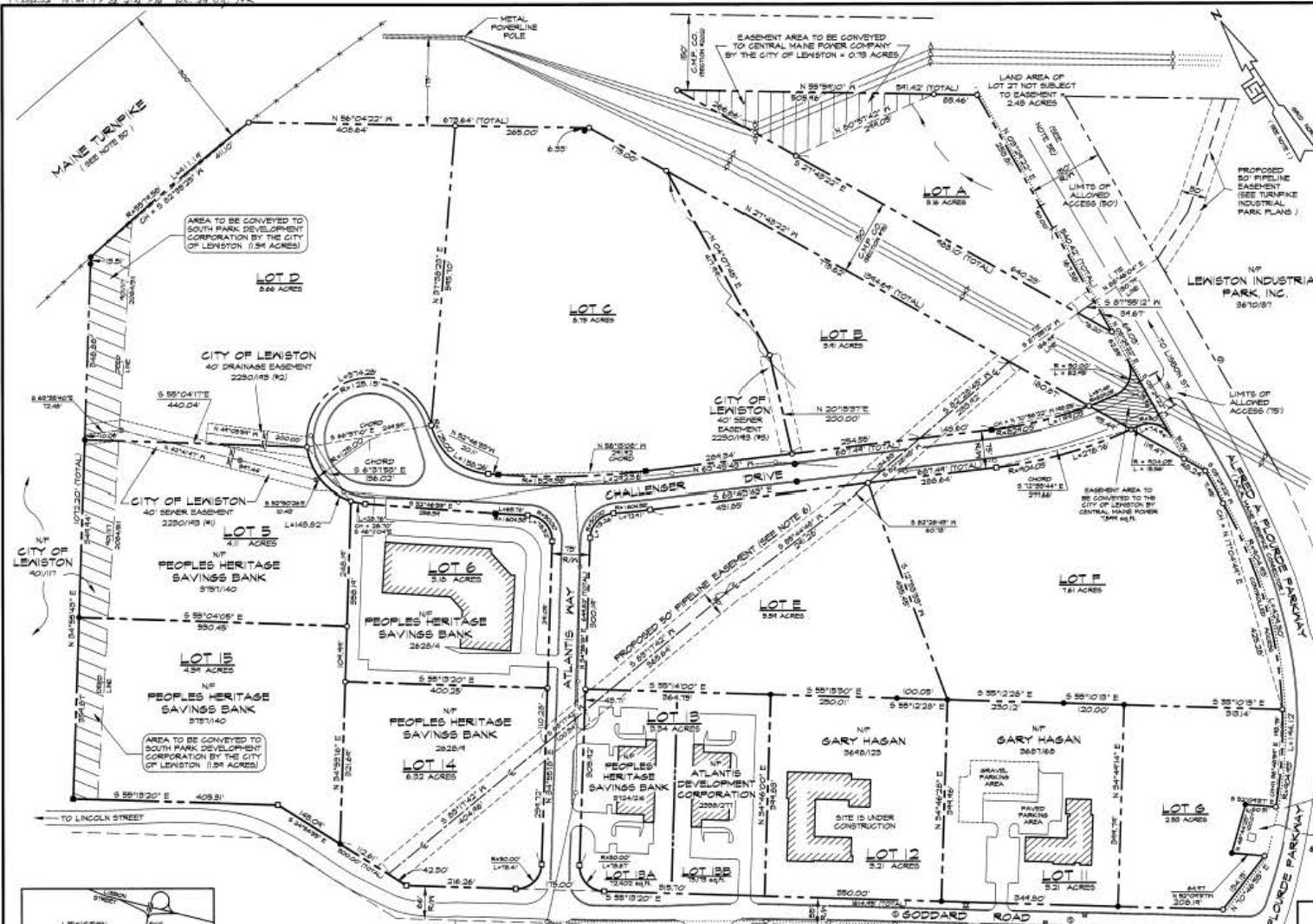
BK. 34. P. 21

BK 34 P 21
 A.C.R.D.

7-20-88 @ 3:45 P.M. B-34 P.21

315.59
 30.30
 29.84

178.81



- NOTES**
- 1) ALL BEARINGS REFER TO MAINE STATE COORDINATE GRID NORTH AS SHOWN ON A PLAN ENTITLED "SOUTH PARK - REVISION 2" PREPARED FOR SOUTH PARK DEVELOPMENT CORPORATION DATED NOVEMBER 1, 1990 PREPARED BY HOSBARD I. CURRIAN, INC. AND RECORDED AT SAID REGISTRY IN BOOK 2084 PAGE 215 (PARCELS 1, 2, 3 & 4)
 - 2) ALL BOOK AND PAGE NUMBERS REFER TO THE ANDROSCOGGIN COUNTY REGISTRY OF DEEDS.
 - 3) SOURCE DEEDS A) SEE DEED OF CITY OF LEWISTON TO SOUTH PARK DEVELOPMENT CORPORATION DATED APRIL 6, 1987 AND RECORDED AT SAID REGISTRY IN BOOK 2084 PAGE 215 (PARCELS 1, 2, 3 & 4)
 - 4) AREAS: LOTS = 64.28 ACRES STREETS = 4.45 ACRES TOTAL = 68.73 ACRES
 - 5) REFERENCE IS MADE TO THE FOLLOWING PLANS:
 - A) "SOUTH PARK-REVISION 1" PREPARED BY THE CITY OF LEWISTON ENGINEERING DEPARTMENT AND RECORDED AT SAID REGISTRY IN BOOK 24 PAGE 2
 - B) "PLAN OF PROPERTY, DUBO GRAYVEL, P.T. INC." PREPARED BY PRIGHT-PIERCE DATED SEPTEMBER 1984 AND RECORDED AT SAID REGISTRY IN BOOK 3, PAGE 41
 - C) "AMENDED PLAN - LOTS 18A & 18B OF LOT 18, SOUTH PARK" PREPARED BY DESSAU TECHNIQUES INC. DATED MARCH 1, 1991 RECORDED AT SAID REGISTRY IN PLAN BOOK 36, PAGE 58
 - D) "MAINE TURNPIKE - SECTION 2 - PROPERTY PLAN" DATED MARCH 1984 SHEETS 1 OF 3 & 2 OF 3 RECORDED AT SAID REGISTRY IN PLAN BOOK 11, PAGE 395 AND BOOK 1, PAGE 58.
 - E) "STATE OF MAINE S.O.T. R/W MAP - M.T.A. CONNECTOR" DATED JANUARY 1984 SHEETS 1 OF 2 OF 4 & 3 OF 4 RECORDED AT SAID REGISTRY IN PLAN BOOK 84, PAGES 78, 80, 1 & 3.
 - F) "THE CENTRAL MAINE POWER CO. R/W MAP FOR SECTION 78" SOUTH PARK PREPARED BY LEWISTON ENGINEERING DIVISION DATED DECEMBER 10, 1985 AND RECORDED AT SAID REGISTRY IN PLAN BOOK 8, PAGE 48.
 - G) "SURVEYS PLAN - REVISION 1, TURNPIKE INDUSTRIAL PARK" DATED MARCH 1985 REVISED THROUGH JANUARY 1991, PREPARED BY TECHNICAL SERVICES, INC.
 - 6) SEE #12.1) FOR PIPELINE EASEMENT (NO LOCATION OR R/W) NOTED). THE PROPOSED PIPELINE EASEMENT IS TO BE COMPLETED BY EXCHANGE OF DEEDS, IDENTIFICATION OF AND PAYMENT BY OUR CLIENT. (I) SOME MONUMENTATION FOUND WILL BE RESET TO MATCH DATA SHOWN ON THIS PLAN. (II) ALL IMPROVEMENTS ON THE SURVEYED LOTS HAVE NOT BEEN FIELD LOCATED.
 - 7) SEE DEED OF SOUTH PARK DEVELOPMENT CORPORATION TO THE CITY OF LEWISTON DATED LINE 1, 1986 RECORDED AT SAID REGISTRY IN BOOK 2282, PAGE 41 (STREETS)
 - 8) SEE 201718 FOR A PIPELINE EASEMENT TO CENTRAL MAINE POWER CO. AND NEW ENGLAND TELEPHONE & TELEGRAPH.
 - 9) SEE 2006142 FOR EASEMENTS GRANTED TO MAINE DEPARTMENT OF TRANSPORTATION.
 - 10) IMPROVEMENTS SHOWN ON LOTS 6, 11, 12, AND 15 ARE SHOWN BASED UPON PLANS APPROVED BY THE CITY OF LEWISTON. IF MEASUREMENTS WERE NOT PERFORMED BY THE SURVEYOR TO VERIFY LOCATIONS SHOWN.
 - 11) THE PURPOSE OF THIS PLAN IS TO AMEND A PORTION OF PREVIOUSLY MENTIONED "SOUTH PARK-REVISION 2" PLAN BY ADDING LOT A, ADDING MOBIL PIPE LINE EASEMENT, IDENTIFYING THE CITY OF LEWISTON EASEMENT FOR CHALLENGER DRIVE, IDENTIFYING THE C.M.P. EASEMENT FOR SECTION 202, ADDING LAND FROM THE CITY OF LEWISTON AND REVISING LOT DIMENSIONS, AREAS, AND NUMBERS TO REFLECT FIELD CONDITIONS AND INTENT.

LEGEND

- MONUMENT TO BE RESET TO MATCH THIS PLAN
- 4" x 4" MONUMENT FOUND (LOCATION HELD)
- IRON ROD FOUND
- 5/8" IRON ROD SET WITH SURVEYOR I.D. CAP
- UTILITY POLE WITH OVERHEAD WIRES
- BOX WIRE (R/W) FENCE
- R/W
- NOR OR FORMERLY
- RIGHT OF WAY
- BOOK / PAGE NUMBERS
- OIL PIPELINE (SEE NOTE #1)
- M.D.T. CONTROLLED ACCESS

SCALE: 1" = 100'

0 50 100 200 300 400

SUBDIVISION PLAN
SOUTH PARK - REVISION 6
 ALFRED A. FLOUDE PARKWAY & GODDARD ROAD
 LEWISTON, MAINE
 ANDROSCOGGIN COUNTY
 PREPARED FOR
SOUTH PARK DEVELOPMENT CORP.
 LEWISTON, MAINE

TSI TECHNICAL SERVICES, INC.
 SURVEYORS AND LAND USE CONSULTANTS
 183 MAIN STREET LEWISTON, MAINE 04240

DATE: JULY 10, 1997 DISK NO. 40 DRAWN BY: S.S.B.
 JOB NO. 4050 FIELD BOOK NO. 394 CHECKED BY: M.P.S.

APPROVAL
 APPROVED BY THE CITY OF LEWISTON PLANNING BOARD
Jay White 10/14/97
 CHAIRMAN DATE

RECORDING DATA
 ANDROSCOGGIN COUNTY REGISTRY OF DEEDS
 RECEIVED October 20, 1997 AT 2:00 P.M.
 AND RECORDED IN PLAN BOOK 39 PAGE 182
 ATTEST: *J. J. White* REGISTRAR

SEE "SUBDIVISION PLAN - REVISION 5" DATED AUGUST 28, 1986 PREPARED BY TECHNICAL SERVICES, INC. (TO BE RECORDED)

THE RIGHT OF WAY FOR GODDARD ROAD IS SHOWN PER PLANS AND A DESCRIPTION OF SAID RIGHT OF WAY PREPARED BY THE CITY OF LEWISTON ENGINEERING DEPARTMENT IN 1986 (UNRECORDED)



CITY OF LEWISTON

Department of Planning & Code Enforcement

TO: Planning Board
FROM: David Hediger, City Planner
DATE: April 6, 2017
RE: April 10, 2017 Planning Board Agenda Item V(a)

Discussion about form based codes.

Kara Wilbur has been invited to discuss form based codes (FBC) with the planning board given her involvement in drafting Lewiston's new comprehensive plan and her familiarity with FBCs. Kara is a planner and urban designer at Principle Inc. and prior to that worked with Town Planning & Urban Design Collaborative (TPUDC). She was part of the TPUDC consulting team that drafted Lewiston's comprehensive plan.

Kara has more than 12 years of national and New England-based experience as a private consultant to municipal and private sector clients. Her work has focused on revitalization of transitioning downtowns, redevelopment of outdated retail corridors, and transportation plans that promote safety and economic value. She has also spearheaded a new generation of comprehensive plans (i.e. Lewiston) as well as innovative form-based codes. She is a co-founding member the New England Chapter of the Congress for the New Urbanism and in 2014 co-founded Build Maine, which has held three planning conferences in Lewiston.

Staff is looking direction from the Board regarding the possible implementation of FBCs. As noted in the comprehensive plan, the goal of a FBC is to regulate the form of the buildings in a prescriptive manner and at a sufficient level of detail so that the outcome is predictable. FBCs are recommended in the plan as another option or alternative Lewiston should consider to conventional zoning in specific areas of the community when a particular outcome is desired for a neighborhood. Staff has asked Kara discuss the basics of FBCs, share her thoughts on the approach and potential pitfalls and benefits from various strategies, and how it can provide a framework that fulfills all the objectives of FBCs: simplicity, ease of use, predictability, etc.