

PLANNING DEPARTMENT MEMO

DATE: December 3, 2025

TO: Windham Town Council
THROUGH: Robert Burns, Town Manager
FROM: Steve Puleo, Director of Planning
Cc: Barry Tibbetts, Senior Project Manager
Amanda Lessard, Senior Planner/Project Manager

RE: Update on the Town of Windham's Comprehensive Plan Process and Amendments to Scope, Schedule, and Budget Memo of August 26, 2025 for the Director of Planning

Town Council Meeting – December 9, 2025

Purpose

This memo updates the 24-month work plan to allow the State agency to finalize rule making. The outline of the proposed scope, schedule, and budget for the rewrite and update of the Comprehensive Plan remains the same. The memo highlights some of the State mandates by the State Housing initiatives approved by Governor Mills during the last legislature session.

Town Council Comments

On August 12, 2025, the Town Council stressed the need for a defined scope, schedule, and budget for the Comprehensive Plan update and identified housing, affordability, land use, and the State's revised Growth Management Act (GMA) compliance as priorities.

During the Town Council meeting of September 9, 2025, the Director of Planning, Steve Puleo, provided a similar version of the memo. The purpose of the Windham Planning Department is to maintain focus, momentum, and transparency to achieve legally sound and efficient land use policies for Windham meeting the State's mandates. On November 25, 2025, Council Riener requested an update on the progress to initiate the Comprehensive Plan process and a discussion of how to achieve the goal.

The Council's discussion included the enactment of Maine LD 1829, Public Law 385, which requires municipalities to allow minimum lot sizes not to exceed 5,000 square feet in designated growth areas served by public, special district, or centrally managed water and sewer systems. The law further establishes a density standard of 1,250 square feet per dwelling unit for the first four units, and 5,000 square feet per unit for any additional unit. Incorporating these requirements into the Comprehensive Plan update will be necessary to ensure compliance and to guide future housing development in appropriate areas.

Overview

The comprehensive plan update for Windham is scoped to focus on (for example, housing, economic growth and development; public health, safety and welfare; and protecting the environment and critical resources, etc.) as well as alignment with Maine's Growth Management Act (GMA), with a clear implementation strategy, should focus on more targeted discussions about the

Future Land Use Map. The plan must make detailed recommendations for amendments to zoning ordinances and maps given the recent housing legislation. The project is scheduled to span approximately 24 months, beginning in September 2025 and concluding by September 2027. The total budget is projected to be between \$160,000 and \$220,000, with \$120,000 to \$180,000 allocated for consultant services and around \$52,000 for staff time.

Outline of Steps to Update the Comprehensive Plan

The Comprehensive Plan update will follow a structured 24-month process starting with goal setting and engagement planning, with a focus on housing and compliance with the Growth Management Act (GMA).

1. **Project Initiation & Scope Definition**, in this phase establishes the foundation for the entire Comprehensive Plan update. It involves setting clear objectives, defining roles, and creating a roadmap for successful execution.
2. **Data Collection & Analysis** will gather demographic, housing, land use, and infrastructure data, including the state's Municipal Planning Assistance Program (MPAP), a service provided by the Maine Department of Agriculture, Conservation and Forestry (DACF) package, to identify trends and future needs.
3. **Visioning & Policy Development** will engage the public via workshops and surveys to define goals, leading to a draft framework.
4. In the **Draft Plan Writing phase**, chapters on housing, transportation, environment, and implementation, and others will be drafted and presented for public review.
5. **Through Public & Stakeholder Review**, it will be presented through hearings and meetings at both Planning Board and Town Council, as well as individual workshops.
6. **Revision & Finalization** will integrate feedback and ensure GMA alignment before submitting the plan for a State Finding of Consistency.
7. **Submission for State Review** of the finalized plan to MPAP for technical review and consistency finding.
8. **The final phase, Adoption & Implementation**, the plan or proposal will be formally submitted for approval and must align with the Town's financial strategy, especially regarding long-term investments and budgeting for major projects or infrastructure.

This timeline aligns with Department of Agriculture, Conservation, and Forestry (DACF) guidance and statewide best practices, ensuring a thorough, and compliant update.

Comprehensive Plan Updated Schedule – 104 Weeks (2 years)

#	Phase	Duration	Estimated Dates***	Description
1.	Project Initiation & Scope Definition	12 weeks	March – May 2026	Establish project goals, confirm deliverables, and set expectations for public engagement and compliance with the new rule of the Growth Management Act (GMA).
2.	Data Collection & Analysis	20 weeks	May – Sept. 2026	Gather and analyze demographic, housing, land-use, and infrastructure data to identify trends and future needs.

#	Phase	Duration	Estimated Dates***	Description
3.	Vision, Goals & Policy Direction	16 weeks	Sept. 2026 – Jan. 2027	Conduct public workshops and surveys to define community vision and draft policy goals.
4.	Draft Plan Writing	20 weeks	Jan. – April 2027	Prepare comprehensive chapters covering housing, transportation, environment, and implementation strategies.
5.	Public & Stakeholder Review	12 weeks	Apr. – July 2027	Present the draft plan to the Town Council, Planning Board, and the public for feedback through hearings and meetings.
6.	Revision & Finalization	12 weeks	Aug. – Nov. 2027	Incorporate feedback and ensure the plan meets GMA consistency standards.
7.	Submission for State Review	4 weeks	December 2027	Submit the finalized plan to the State for technical review and consistency finding.
8.	Adoption & Implementation Strategy	8 weeks	Jan 2028 – March 2028	Present the plan for formal adoption and align implementation with capital improvement planning.
	Total Duration	104 weeks	Mar. 2026 – Mar. 2028	Full two-year timeline for a thorough, inclusive, and compliant update process.

***Estimated dates are dependent on the Municipal Planning Assistance Program (MPAP) completing the new rule-making process required by the adoption of LD 1751.

Budget Breakdown (Staff and Consultant)

The budget for updating Windham's Comprehensive Plan includes consultant services and staff time. Consultant costs for towns of similar size typically range from \$110,000–\$170,000, with larger or more engagement-heavy plans reaching \$200,000–\$300,000. Minimal updates can cost \$30,000–\$50,000, though these often fall short of meeting public engagement and legal compliance standards.

Staffing adds approximately 450 staff hours, and the current Comprehensive Plan professional services (item# 17110 4440 PROF SVCS) is 50,621.33. I am estimating the overall budget should be \$250,000 to ensure compliance, engagement, and coordination over the projected two-year update process. I have submitted a budget request for FY 27 and FY28 of \$100,000 each year.

(No change to this table)

Comprehensive Plan Task Comparison with Estimated Time and Cost Requirements***

#	Task	Staff Responsibilities	Estimated Staff Hrs.	Consultant Responsibilities	Estimated Consultant Cost
1.	Project Initiation, Scoping, & Management	To form a Steering Committee; Coordinate with Town Council and departments; Manage contracts and procurement	100	Develop project work plan and timeline; Facilitate kickoff meetings; Advise on best practices and compliance with L.D. 1751	\$15,000

#	Task	Staff Responsibilities	Estimated Staff Hrs.	Consultant Responsibilities	Estimated Consultant Cost
2.	Public Engagement	Promote events and surveys; Coordinate logistics for workshops and hearings; Liaise with community groups	80	Design engagement strategy; Facilitate workshops, focus groups, and surveys; Analyze public input and summarize findings	\$25,000
3.	Data Collection & Inventory Analysis	Provide access to local data (e.g., permits, infrastructure); Coordinate with regional agencies	60	Update demographic, housing, and land use data; Conduct climate vulnerability and hazard assessments; Prepare GIS maps and spatial analysis	\$45,000
4.	Visioning, & Goal Setting	Support community outreach; Review draft goals and provide feedback	40	Facilitate visioning sessions; Draft community vision and long-term goals; Align goals with state and regional priorities	\$15,000
5.	Policy Development	Review and comment on draft policies; Coordinate with zoning and ordinance updates	60	Draft policies for land use, housing, transportation, economic development, and climate resilience; Recommend implementation strategies	\$25,000
6.	Drafting the Plan, Implementation, Code Audit	Internal review of draft chapters; Coordinate public review process	40	Write and format the full plan document; Incorporate feedback from staff and public	\$45,000
7.	Adoption & Certification	Schedule public hearings and Council vote; Submit final plan to State DACF	30	Prepare final plan and presentation materials; Assist with state submission and certification process	\$10,000
8.	Contingency (10%)		41		\$18,000.00
	Totals		451		\$198,000.00

***Consultant costs are based on the Town's budget for the 2016 Comprehensive Plan update.

Key Challenges

The implementation of L.D. 1751 presents a series of significant challenges for Windham as it undertakes the Comprehensive Plan update. The legislation adds new housing definitions, deadlines, and procedural complexity. Each of these changes must be accurately reviewed to ensure

alignment with the Growth Management Act and local ordinances, creating a workload that will require both legal precision and policy expertise. The State is expected to undertake rulemaking later this year or early next year to amend Chapter 208 that establishes the criteria that the MPAP uses to review community comprehensive plan for consistency with the goals and guidelines of the Growth Management Act.

As important is the expectation of meaningful public engagement. Residents and stakeholders will have opportunities to participate through workshops, surveys, online platforms, and focus groups. While this involvement is critical for legitimacy and political support, it demands considerable staff and the heavy lift is the consultant time, along with the resources needed to design and manage a comprehensive outreach program.

The plan update will also center on the Town's ability to provide reliable data and analysis. State compliance standards require detailed projections for population, housing, transportation, and economic development, as well as integration of environmental and infrastructure considerations. Producing and confirming these datasets involves not only technical expertise but also coordination with regional and state bodies, which adds cost and complexity to the process.

At the local level, coordinating across multiple departments adds complexity. Comprehensive planning touches housing, transportation, economic development, natural resources, and municipal services, and all must be integrated into a single, coherent framework. Given the Town's limited planning staff, this level of interdepartmental coordination will need effective project management to stay on track.

Maine Benchmarks Informing the Budget

Recent Maine examples show that towns of similar size typically spend \$150,000 to \$200,000 on consultant services when municipal staff assume a substantial share of the work. For Windham (~20,000 population), however, the goals of strong public engagement, detailed mapping, and a comprehensive code audit demands greater effort. To ensure the Comprehensive Plan update is both strong and legally defensible, the budget should be set in the \$200,000 to \$300,000 range, with a 10% contingency included.

Municipality	Population	Consultant Budget	Scope Notes	Source
Brunswick	~21,000	\$150,864	Full update with consultant Haley Ward; completion targeted for Summer 2025	Brunswick Comp Plan Update 1
Gorham	~18,000	\$200,000	FY25–26 budget includes planning work comparable to a comp plan effort	Gorham FY25–26 Budget 2
South Portland	~24,000	\$200,000 (based budget set)	RFP issued for full plan development and engagement, high community involvement	Comprehensive Plan 2012 South Portland, ME 3
Auburn	~24,000	Not listed	High-intensity scope with consultant Berry Dunn; active committee and public engagement	Auburn Comp Plan Committee 4

Raymond	~4,500	\$120,000– \$180,000	Full update led by North Star Planning; included public engagement, land use analysis, and climate resilience planning	Raymond Comp Plan 5
Eliot	~7,000	\$30–35k	Lean consultant budget; relied heavily on staff and committee; achieved DACF consistency in 2025	Eliot 2025 Plan 6

Justification:

Funding for professional consulting services is essential to ensure the Town's Comprehensive Plan update complies with the requirements of LD 1751 and the Maine Growth Management Act. These services will provide the technical expertise needed to guide project initiation, scoping, and management, as well as facilitate robust public engagement, both critical components for creating a legally compliant, data-driven, and community-supported plan. Without adequate resources, the Town risks delays, non-compliance, and reduced stakeholder participation, which could undermine long-term growth and development objectives.

Recommendation

To allocate \$100,000 for Comprehensive Plan Professional Services for both fiscal years 2027 and 2028, authorize the Planning Department to establish a sufficient budget to issue a Request for Proposals (RFP) for professional consulting services necessary to ensure compliance with LD 1751 and the Maine Growth Management Act. Further, authorize the Planning Department to initiate Task 1: Project Initiation, Scoping, and Management, and Task 2: Public Engagement beginning in the third quarter of fiscal year 2025–2026.