

**From:** Stephina Doucette <sdldoucette@gmail.com>  
**Sent:** Saturday, June 6, 2026 9:56 PM  
**To:** Planning Board  
**Cc:** Derek <3  
**Subject:** Public Comment regarding Highland Cliff Estates (180 Highland Cliff Road)  
– Sketch Plan Review

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**To:** Windham Planning Board ([PlanningBoard@windhammaine.us](mailto:PlanningBoard@windhammaine.us))

**From:** Derek and Stephina Doucette

**Address:** 5 Patience Drive, Windham, Maine 04062

**Date:** 6/6/26

**Subject:** Public Comment regarding Highland Cliff Estates (180 Highland Cliff Road)  
– Sketch Plan Review

Dear Members of the Windham Planning Board,

As a property owner essentially abutting the proposed 27-lot subdivision at 180 Highland Cliff Road ("Highland Cliff Estates"), I am writing to express my strong opposition to the developer's request for multiple ordinance waivers during this sketch plan review.

The subject property is located in the Farm (F) District, an area known for its rural character and agricultural roots. While development is a right, it must strictly adhere to the Town's existing subdivision ordinances to protect our shared environment, infrastructure, and property values. Currently, this proposal bypasses several critical municipal standards.

I respectfully urge the Board to reject the requested waivers and require the applicant to meet the fundamental requirements of our town ordinances for the following reasons:

## **1. Direct Threat to Abutting Well Water and the Local Watershed**

Our property features a small surface brook that actively feeds into the larger local watershed, and our household relies entirely on a private well that is highly sensitive to surrounding groundwater levels and surface runoff. Introducing 27 new, concentrated septic systems and private wells onto the adjacent parcel poses a severe and direct risk to both the recharge rate and the safety of our drinking water.

This localized risk to abutters is compounded by the broader environmental impact. This specific watershed drains directly toward Lincoln Weeks Brook and, subsequently, Inkhorn Brook—waterways the Town of Windham has already identified as impaired and is actively monitoring for water quality degradation.

Despite these high stakes, the state wildlife agency review currently on file is based on a 14-lot subdivision, not the 27 lots currently proposed. Relying on an environmental review scaled for half the project size is a profound failure of due diligence. It is imperative that a comprehensive hydrologic study and an updated environmental impact review be completed for the *actual* 27-lot scope before any approvals are considered, ensuring abutting wells and already-impaired town brooks are not irreparably harmed.

## **2. Failure to Meet Conservation Open Space Requirements**

The applicant is proposing a "conservation" subdivision layout. Under Windham's zoning ordinances for the Farm District, conservation subdivisions allow for reduced minimum lot sizes and frontage requirements in exchange for preserving significant open space.

However, the developer is requesting a waiver because they fall 2.8 acres short of the required permanent open space necessary to justify this density. The open space requirement is the fundamental mechanism that prevents land from being overbuilt, protects natural runoff buffers, and justifies the higher density of homes. Waiving this requirement allows the developer to exploit the benefits of a conservation subdivision without fulfilling its statutory obligations to the Town and its abutters.

## **3. Unjustified Waiver for a Traffic Impact Analysis**

The Town of Windham Major Subdivision Preliminary Plan Review Application explicitly mandates a Traffic Impact Analysis for subdivisions projected to generate more than 140 vehicle trips per day.

By the applicant's own estimates, this 27-home project will generate roughly 255 daily vehicle trips—nearly double the municipal threshold. Highland Cliff Road and its intersection with River Road handle significant morning commuter volume. Waiving a traffic study for a project that so clearly exceeds the Town's own threshold is a disregard for public safety and infrastructure planning. The town must understand what intersection improvements are required to handle this load safely before granting any approvals.

In conclusion, this is not about preventing growth; it is about ensuring responsible, ordinance-compliant growth. The rules regarding open space, traffic, and environmental impact exist to protect Windham's residents and natural resources. Granting waivers for a project that fails to meet these basic standards places the burden of overdevelopment entirely on the abutters, the environment, and the Town's infrastructure.

I urge the Planning Board to hold Highland Cliff Estates, LLC to the exact letter of the town's zoning and subdivision ordinances. Please deny the requests to waive the open space requirements and the traffic study, and mandate that all state environmental and hydrologic reviews be updated to reflect a 27-home development.

Thank you for your time, your service to the town, and for submitting these comments into the public record.

Sincerely,

Sincerely,

Derek & Stephina Doucette

207-879-9259