

**PLANNING DEPARTMENT MEMO**

DATE: August 26, 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: Town of Windham's Comprehensive Plan Rewrite and Update: Scope, Schedule, and Budget

Town Council Meeting – September 9, 2025

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**Purpose**

This memorandum outlines the proposed scope, schedule, and budget for the rewrite and update of the Town of Windham's Comprehensive Plan. The update is intended to align with current state mandates, reflect community priorities, and guide future growth and development.

**Town Council Comments (August 12, 2025)**

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. The Planning Department is committed to maintaining focus, momentum, and transparency to deliver a legally sound and efficient plan.

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 units. 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 a 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

1. 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).
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 fit into 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 Update Schedule – 104 Weeks (2 years)

#	Phase	Duration	Estimated Dates***	Description
1.	<b>Project Initiation &amp; Scope Definition</b>	12 weeks	Sept – Nov 2025	Establish project goals, confirm deliverables, and set expectations for public engagement and compliance with the Growth Management Act (GMA).
2.	<b>Data Collection &amp; Analysis</b>	20 weeks	Dec 2025 – Apr 2026	Gather and analyze demographic, housing, land-use, and infrastructure data to identify trends and future needs.
3.	<b>Vision, Goals &amp; Policy Direction</b>	16 weeks	May – Aug 2026	Conduct public workshops and surveys to define community vision and draft policy goals.
4.	<b>Draft Plan Writing</b>	20 weeks	Sept 2026 – Jan 2027	Prepare comprehensive chapters covering housing, transportation, environment, and implementation strategies.
5.	<b>Public &amp; Stakeholder Review</b>	12 weeks	Feb – Apr 2027	Present the draft plan to the Town Council, Planning Board, and the public for feedback through hearings and meetings.
6.	<b>Revision &amp; Finalization</b>	12 weeks	May – July 2027	Incorporate feedback and ensure the plan meets GMA consistency standards.

#	Phase	Duration	Estimated Dates***	Description
7.	<b>Submission for State Review</b>	4 weeks	August 2027	Submit the finalized plan to the State for technical review and consistency finding.
8.	<b>Adoption &amp; Implementation Strategy</b>	8 weeks	Sept – Oct 2027	Present the plan for formal adoption and align implementation with capital improvement planning.
	<b>Total Duration</b>	104 weeks	Sept 2025 – Oct 2027	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 \$52,000, based on 0.5 FTE for a planner (\$40,000) and 0.2 FTE for administrative support (\$12,000). I am estimating the overall and combined budgets would be \$160,000–\$220,000 to ensure for compliance, engagement, and coordination over the projected two-year update process.

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

#	Task	Staff Responsibilities	Estimated Staff Hrs.	Consultant Responsibilities	Estimated Consultant Cost
1.	<b>Project Initiation, Scoping, &amp; Management</b>	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
2.	<b>Public Engagement</b>	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.	<b>Data Collection &amp; Inventory Analysis</b>	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

#	Task	Staff Responsibilities	Estimated Staff Hrs.	Consultant Responsibilities	Estimated Consultant Cost
4.	<b>Visioning, &amp; Goal Setting</b>	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.	<b>Policy Development</b>	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.	<b>Drafting the Plan, Implementation, Code Audit</b>	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.	<b>Adoption &amp; Certification</b>	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.	<b>Contingency (10%)</b>		41		\$18,000.00
	<b>Totals</b>		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 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	<a href="#">Brunswick Comp Plan Update</a> 1
Gorham	~18,000	\$200,000	FY25–26 budget includes planning work comparable to a comp plan effort	<a href="#">Gorham FY25–26 Budget</a> 2
South Portland	~24,000	\$200,000 (based budget set)	RFP issued for full plan development and engagement, high community involvement	<a href="#">Comprehensive Plan 2012   South Portland, ME</a> 3
Auburn	~24,000	Not listed	High-intensity scope with consultant Berry Dunn; active committee and public engagement	<a href="#">Auburn Comp Plan Committee</a> 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	<a href="#">Raymond Comp Plan</a> 5
Eliot	~7,000	\$30–35k	Lean consultant budget; relied heavily on staff and committee; achieved DACF consistency in 2025	<a href="#">Eliot 2025 Plan</a> 6