

December 8, 2025

Senator Chip Curry

Representative Traci Gere

Members of the Committee on Housing and Economic Development, Room 206

**RE: LD 1926 An Act to Require Increased Housing Density or Lower Minimum Lot Sizes for Workforce Housing**

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Senator Curry, Representative Gere, and Members of the Committee:

My name is **Stephen Puleo**, and I serve as the **Director of Planning for the Town of Windham**. With over **22 years of experience in municipal planning in Southern Maine**, I have seen firsthand how thoughtful, locally driven planning protects community character, ensures infrastructure capacity, and balances growth with environmental and fiscal responsibility.

I am deeply concerned that LD 1926 lacks municipal and public involvement, while introducing sweeping changes that will **erode local control and undermine decades of municipal investment in professional planning and implementation**. Maine communities have invested heavily in aligning local, state, and federal policies through comprehensive plans, zoning ordinances, and public engagement processes. LD 1926 disregards these efforts and imposes a one-size-fits-all approach that threatens to dismantle this collaborative framework.

#### ***Key Concerns***

- **Excessive AMI Threshold:** 220% AMI far exceeds workforce housing needs. The focus should remain on **120%-160% AMI**, consistent with LD 2003.
- **Unrealistic Parking Standards:** 1 space per 3 units is not practical for Maine's rural reality. Studies show that **0.67 spaces per unit** is more accurate.
- **Extreme Lot Size Reductions:** Up to **90% reductions** (e.g., 40,000 sq ft down to 4,000 sq ft) conflict with septic requirements and rural and growth area planning.
- **Broad Statewide Application:** Applies to all communities, including rural areas, creating inconsistencies with approved comprehensive plans.
- **Oversight and Enforcement:** Compliance responsibility is unclear, and Maine State Housing Authority's role is not defined.

#### ***Why This Matters***

LD 1926 introduces a complex zoning bonus system that is difficult to interpret, impossible to enforce uniformly, and likely to result in unintended consequences for municipalities. It disregards Maine's tradition of **public involvement and local governance**, and risks wasting millions of dollars in municipal investments made to comply with state mandates and federal guidelines.

I respectfully urge the Committee to recommend "Ought Not to Pass" on LD 1926 and instead pursue targeted solutions that:

- Align with LD 2003's framework to use existing density bonuses.
- Focus on realistic AMI thresholds (120% to 160%).
- Apply only in designated growth areas and no mandates minimum lot size of growth areas.
- Maintain standards that reflect Maine's rural transportation, infrastructure realities, and State's environment.

Thank you for your consideration and commitment to balanced housing policy.

Respectfully Submitted,

Stephen J. Puleo

Director of Planning

Town of Windham, Maine