

Memorandum

To: Patricia Quinn

From: Mary Costigan

Date: January 20, 2026

RE: Summary Comparison of Train Station Locations

This memo compares the project components necessary to construct and operate a Portland Amtrak Downeaster train station along the CSX mainline on the downtown Portland peninsula at either Site #2 or Site #3. The two sites, only 1,200 feet apart on the same side of the street and separated by one building and a parking garage, have similar potential for improving access and mobility and spurring economic development. However, Site #3 achieves higher benefits at lower cost, without the considerable feasibility obstacles and risks of Site #2.

At Site #2, the platform east of the tracks would be located behind the building at 222 St. John Street, between the Union Station Shopping Plaza building and the MaineHealth employee parking garage. The platform on the west side of the tracks would be located adjacent to the Cumberland County Jail, with the station building partially located on County Jail property. At Site #3, the platform on the east side of the tracks would be located on St. John Street between Ferguson Plumbing Supply and the Barber Tyson Foods. The platform west of the tracks would be located adjacent to the Northern Light Mercy Hospital employee parking lot, with the station building partially located on Northern Light Mercy Hospital property.

In addition, this memo reiterates the need for relocation and why remaining at the current location at the Portland Transportation Center (PTC) on Thompson's Point is not a viable option if regional goals are to grow rail ridership through reduced travel time, improved on-time performance, and expanded service frequency in accordance with the Maine State Rail Plan¹ and Transit Tomorrow.²

¹ Maine State Rail Plan, Cambridge Systematics for MaineDOT, March 2023.

<https://www.maine.gov/dot/sites/maine.gov.dot/files/docs/ofps/docs/railplan/MaineStateRailPlan.pdf>

² Transit Tomorrow, AECOM for Greater Portland Council of Governments, March 2021

<https://www.gpcog.org/176/Transit-Tomorrow>

I. Railroad Needs

A. Site #2

1. In addition to the existing double track configuration, Site #2 requires a station track, resulting in three tracks extending across Congress Street.
2. Due to its location in proximity to the grade crossing at Congress Street, Site #2 will require signal and grade crossing reconfigurations.
3. The proximity to the grade crossing at Congress Street will result in longer gate-down times compared to existing conditions. Mitigations are possible, but none that would result in gate closure times that match existing conditions. Safety is a serious concern and a station adjacent to a grade crossing increases risk to vehicles and pedestrians.
4. CSX Transportation and Amtrak have expressed concerns about the additional risk associated with the proximity of Site #2 to the Congress Street grade crossing

B. Site #3

1. The proximity of Site #3 to the Mountain Division Branch Line and the Portland Layover Facility (PLF) increases the fluidity of passenger and freight train operations, so a third station track is not required.
2. A station at Site #3 will be located outside of the signal circuit and will have no impact on the Congress Street grade crossing.
3. Locating a station at Site #3 will not impact the gate closure times beyond existing conditions.
4. CSX Transportation and Amtrak have expressed support for development of an Amtrak Downeaster station at Site #3.

II. Property Needs

The project will be funded with federal dollars which prohibits land negotiations until the National Environmental Policy Act (NEPA) process is complete. Therefore, although NNEPRA has engaged in initial conversations with property owners to make them aware of the project, no negotiations have begun.

A. Site #2

1. The platform and elevator towers on the west side of the tracks would be located partially on property owned by Cumberland County. The station building would be situated approximately 54 feet from the jail.
 - a. NNEPRA would need to acquire approximately 5,700 sq. ft. of County property.
 - b. Jail perimeter road and maintenance access would need to be reconfigured.
 - c. Jail parking spaces would need to be relocated.
 - d. An access agreement or easement would need to be obtained for emergency access/egress from platform on County property.
 - e. The County is not in favor of the project at Site #2 and is unwilling to sell the necessary property to NNEPRA.

- f. Eminent domain is not available to NNEPRA for the County property. Thus, without the County's voluntary sale of property, there can be no platform on the west side of the tracks at Site #2. Dual platform access for Amtrak Downeaster trains is a project requirement. Emergency access/egress from both sides of the tracks is also required to meet safety code.
 2. Station access, passenger amenities, parking, platform, and elevator towers on the east side of the tracks would be located on property owned and/or leased by MaineHealth.
 - a. NNEPRA would need to acquire approximately 27,000 sq. ft. of property from MaineHealth and an additional 32,600 sq. ft. from Cowcatcher LLC, on which MaineHealth has a long-term lease.
 - b. The underground stormwater facility located adjacent to the MaineHealth garage would need to be reconstructed.
 - c. MaineHealth has consistently opposed the construction of an Amtrak Downeaster station on its property and will not willingly sell the property to NNEPRA. An eminent domain proceeding would result in a lengthy and costly legal battle.
 3. A fence would need to be installed along the CSX right-of-way.
- B. Site #3
1. The platform and elevator towers on the west side of the tracks would be located partially on property owned by Northern Light Mercy Hospital.
 - a. NNEPRA would need to acquire approximately 2,000 sq. ft. of land from Northern Light to support the platform and acquire easements to allow for pedestrian access to the station from the Fore River Parkway.
 - b. Northern Light has expressed a willingness to negotiate with NNEPRA on the property needs and also a potential phased approach to future parking and vehicular access, however negotiations cannot take place until NEPA is complete.
 2. Station access, passenger amenities, parking, platform, and elevator towers on the east side of the tracks will be located on property owned by three separate entities.
 - a. NNEPRA has been in contact with property owners who appear willing to negotiate, however negotiations cannot take place until NEPA is complete.
 3. A fence would need to be installed along the CSX right-of-way.

III. Parking

A new Amtrak Downeaster station in Portland must provide parking for 105 cars.

A. Site #2

1. The station facility and access at Site #2 would displace 118 existing parking spaces which support MaineHealth and 222 St. John Street.
2. A new 4-story shared parking structure for approximately 223 spaces would need to be constructed south of the Union Station Shopping Plaza.

3. Access from St. John Street would need to be improved to allow for safe ADA compliant station access for pedestrians and for safe bicycle access to and through the shared traffic lane.

B. Site #3

1. Existing buildings at 108, 130 and 154 St. John Street will need to be removed to accommodate 105 surface parking spaces.
2. One-way traffic will circulate through the lot and to the station drop-off area and directly back out to St. John Street.
3. NNEPRA is exploring the potential for parking and vehicular circulation on the west side of the tracks, creating access to and from the Fore River Parkway.

IV. Additional Considerations

A. Site #2

1. The station at Site #2 will cost approximately \$79.3M to acquire, design, and construct.
2. There is no potential for vehicle or pedestrian access to or from the platform or station facilities on the west side of the tracks.
3. The station is within a ½ mile walking distance of more than 9,000 jobs but does not include the Northern Light Mercy Hospital campus.
4. The station at Site #2 would not be visible from the street because it would be located behind 222 St. John St., between two parking garages, and adjacent to the County Jail.
5. The site is currently serviced by METRO and BSOOB transit routes on Congress Street, approximately 1,200 feet from the station. The site is also serviced by one METRO and one BSOOB transit route on St. John Street.
6. The station, access facilities, and parking garage will reduce the square footage available for future transit-oriented development on the MaineHealth property.
7. Station access and circulation will be shared with the MaineHealth employee shuttle, which operates over 600 times per day, as well as Union Station Plaza patrons, creating congestion and pedestrian safety concerns.

B. Site #3

1. The station facility at Site #3 will cost approximately \$60.1M to acquire, design, and construct.
2. Vehicular access will occur via St. John Street with pedestrian access from both St. John Street and the Fore River Parkway.
 - a. The potential for vehicular access from the Fore River Parkway is under consideration.
 - b. Pedestrian access and the streetscape along the south end of St. John Street will be improved as will pedestrian access via

the Fore River Parkway.

3. The station is within ½ mile walking distance of more than 9,000 jobs including the Northern Light Mercy Hospital campus.
4. The station will be visible from St. John Street, the Fore River Parkway, the Veteran's Memorial bridge, and I-295.
5. The site is currently served by one METRO and one BSOOB transit route on St. John Street, approximately 300 feet from the east platform, and also on the Fore River Parkway, approximately 500 feet from the west platform.
 - a. Additional bus service can be expanded to meet demand. METRO has expressed a willingness to increase service to the new train station once relocated.
 - b. Potential connection to the PTC via Concord Coach Lines is under consideration via the Fore River Parkway.
6. The station will have an open and accessible accessway and vehicular circulation area used solely for station patrons.
7. The station will create new bike/pedestrian connectivity between the St. John Street corridor and the Fore River Parkway and trail.
8. Due to its location south of the Mountain Division Branch Line, future east/west transportation connections remain possible.
9. Redevelopment of the Union Station Shopping Plaza property will be unrestricted and redevelopment of parcels along St. John Street is foreseeable, all within ½ mile walking distance of the station.

V. Thompson's Point is not a Viable Option

- A. The current station at the PTC on Thompson's Point is located on the Mountain Division Branch Line. This location requires additional train maneuvers totaling 15 minutes of additional travel time for passengers traveling through Portland or arriving in Portland from the north, and a total of 5 minutes for passengers traveling from Portland to points south, or from points south arriving in Portland.
- B. Required switching of tracks and changing directions on the mainline causes train congestion that reduces on-time performance and limits future service growth and expansion across the region.
- C. The PTC is within a ½ mile walking distance of only 3,000 jobs. Commuters do not use the Downeaster to get to Portland because the station is not walkable to major employers and it is quicker to drive.
- D. The current location interferes with the movement of freight.
- E. Keeping the station at the existing location is inconsistent with the recommendations of the Maine State Rail Plan and Transit Tomorrow.
- F. The results of these factors are significant:
 1. People choose to drive instead of taking the train, resulting in more cars in downtown Portland competing for parking and increased vehicle emissions.
 2. The additional train maneuvers result in significant operating costs

and fuel consumption. In 2023, the maneuvers used an additional 3,650 hours of crew time and 8,600 more gallons of fuel than required with a mainline station – totaling close to a million dollars annually in extra costs for passengers and Maine taxpayers.

VI. Conclusion

Moving the Portland Amtrak Downeaster train station to the mainline is the best decision for rail passengers, rail operators, the region, and the City. Station relocation will reduce travel time and bring riders closer to their places of work, resulting in fewer cars on the road and in the City. A location on the mainline also opens the door for future expansion of service.

Locating the station on St. John Street will result in foreseeable development and improvement to that corridor. Of the two options for locations on the mainline, Site #2 is not viable due to a lack of property availability, as well as access, safety and compatibility concerns. Site #3 has many advantages, including the ability to access the station from both St. John Street and the Fore River Parkway and neutral impacts on the Congress Street grade crossing.

The potential for financial assistance to relocate the train station is a tremendous opportunity that should not be missed.