

The following is submitted by TrainRiders Northeast (“TRNE”), a nonprofit, grassroots, citizens organization whose primary purpose is to educate public officials and the public at large as to the benefits of passenger rail service in the northeast, and which advocates for the use of such service as part of a balanced transportation system. Since 1989, TRNE has worked long and hard to obtain and improve the Downeaster service and it is strongly supportive of moving the Portland station to Site 3 on the mainline of the Downeaster service.

A. As far back as the early 1990s, TRNE made it clear that a Portland station, located on the main line, would increase the efficiency of the service and we were disappointed when that did not occur. Not only will a mainline location result in a savings of up to 15 minutes for each train even when things are running smoothly, the double tracking available at the new station will avoid additional delays that now occur when north and southbound trains scheduled to arrive at this station at nearly the same time are a bit late. Currently, this results in a strange and frustrating dance of trainsets as they each jockey for position to enter the Mountain Division, reach the platform at the current station, and then depart utilizing the same single track that is the only access to that Division’s line.

B. TRNE heartily supports the choice of Site 3 as the location for the new Portland station. The three sites proposed are all on the main line, provide easy access to highways, and can be configured to provide pedestrian and bicycle access. Although they are all a bit of a distance from the Portland Jetport and downtown Portland, this cannot be avoided, since the main line is located there. Public transit access to those destinations is available from any of those locations through taxis, Metro buses, and ride-share services. Of the three proposed locations, Site 3 presents the fewest operational difficulties, by providing better access to the Mountain Division layover facility as well as any future passenger service on that Division, while at the same time eliminating the potential for trains stopped at the station to block street crossings, an issue that would arise at the other two proposed sites. Site 3 is also already double-tracked, minimizing the cost of outfitting the new station to permit two trains to access it at the same time.

C. TRNE does have some concerns with the new station as currently proposed, other than its location:

1. Slide 9 at the August 13, 2024 virtual public meeting for the new station indicates that NNEPRA is considering a station that would include only 750 square feet of space for a waiting area, ticketing, and restrooms. Currently, 60 passengers or more may depart or board some of the trains in Portland. Moreover, several southbound and northbound trains have arrival and departure times in Portland that are fairly close together. If those trains arrive at the new station at about the same time (something that could occur at the new station because of its double track), then 120 people or more may be attempting to move through and otherwise use the station simultaneously. Seven hundred and fifty square feet of space for even 60 people, much less 120, is far too small. Admittedly, the number of passengers boarding at and departing from the Portland station may decrease as a result of the proposed new West Falmouth station, but the amount of that decrease is unknown. Moreover, the station, while probably not built for eternity, still has to accommodate any potential increases in overall ridership that may occur in the foreseeable future.

Amtrak previously issued a formula for calculating the square footage necessary for a waiting room at its stations. See Amtrak Station Program and Planning Guidelines at 97-98 (May 1, 2013), available at [https://www.aiava.org/wp-content/uploads/2022/01/2022-RESOURCE\\_Amtrak\\_Station\\_Program\\_Planning\\_Guidelines.pdf](https://www.aiava.org/wp-content/uploads/2022/01/2022-RESOURCE_Amtrak_Station_Program_Planning_Guidelines.pdf), accessed August 27, 2024. In Amtrak’s FY23 fiscal year, the current station served 180,288 passengers. See Amtrak Fact Sheet, Fiscal Year 2023, State of Maine, available at <https://www.amtrak.com/content/dam/projects/dotcom/english/public/documents/corporate/statefactsheets/MAINE23.pdf>, retrieved on 8/27/2024. The Amtrak formula shows that, at the 2023 ridership level, the station needs a waiting area of 325 square feet for each train that might be in the station. Given the close timing of arrivals from the north and south in Portland, trains, the new station needs a waiting area that is double this size, which comes to 650 square feet. Additionally, in January 2022, Amtrak published its guidelines for planning and developing stations. See Amtrak Station Planning and Development Guidelines (January 2022) (the “Guidelines”), available at <https://www.greatamericanstations.com/request-access-to-documents/>, accessed August 27, 2024. Category 2 stations described in the Guidelines (and referenced there as “medium stations”) typically had a ridership of 100,000 to 400,000 passengers annually. See Guidelines at 27. The Guidelines note that Category 2 stations need at least 100 square feet of space simply to store records and station supplies. See Guidelines at 64. Using the FY2023 ridership figures, this increases the minimum station size to at least 750 square feet, plus space for bathrooms, ticketing, offices for Amtrak personnel, and ancillary activities. Given increased ridership since FY 2023, as well as future increases resulting from increased demand and anticipated increases in service (including additional Downeaster service beyond the current five round trips per day), the station size, including the waiting area, bathrooms, ticketing area, and offices should be at least 2,500 square feet in size. This is more in line with the square footage of the following examples of stations that serve a similar number of passengers:

a. Ann Arbor, Michigan

FY23 passengers: 136,431 passengers in FY. See Amtrak Fact Sheet, Fiscal Year 2023, State of Michigan, available at <https://www.amtrak.com/content/dam/projects/dotcom/english/public/documents/corporate/statefactsheets/MICHIGAN23.pdf>, accessed August 27, 2024.

Station size: 3,206 square feet

See R. Stanton “What an \$81M train station could look like and why Ann Arbor wants to build it” (September 21, 2017), available at [https://www.mlive.com/news/ann-arbor/2017/09/what\\_an\\_81m\\_train\\_station\\_coul.html](https://www.mlive.com/news/ann-arbor/2017/09/what_an_81m_train_station_coul.html), accessed August 27, 2024.

b. Norfolk, Virginia

FY23 passengers: 230,114. See Amtrak Fact Sheet, Fiscal Year 2023, Commonwealth of Virginia, available at <https://www.amtrak.com/content/dam/projects/dotcom/english/public/documents/corporate/statefactsheets/VIRGINIA23.pdf>, accessed 8/27/2024.

Station size: 3,500 square feet

See Norfolk, Virginia web site available at <https://www.norfolk.gov/facilities/facility/details/norfolk-amtrak-station-188>, accessed August 27, 2024.

c. Johnstown, Pennsylvania

FY23 passengers: 16,449 passengers. See Amtrak Fact Sheet, Fiscal Year 2023, Commonwealth of Pennsylvania, available at <https://www.amtrak.com/content/dam/projects/dotcom/english/public/documents/corporate/statefactsheets/PENNSYLVANIA23.pdf>, accessed August 27, 2024.

Station size: Amtrak easement requires 1500 square foot station. See Johnstown, Pennsylvania “Project Description, Train Station at p. 1, available at <https://johnstownpa.gov/wp-content/uploads/2023/05/Project-Description-Train-Station-04.12.23.pdf>, accessed 8/27/2024

d. Raleigh, North Carolina

FY23 passengers: 219,538. See Amtrak Fact Sheet, Fiscal Year 2023, State of North Carolina, available at <https://www.amtrak.com/content/dam/projects/dotcom/english/public/documents/corporate/statefactsheets/NORTHCAROLINA23.pdf>, accessed August 27, 2024.

Station size: 26,000 sq ft including an event space for 700 or more. See This Raleigh, North Carolina, Amtrak Station Could Provide Model for Other Cities (CoStar), July 27, 2022, available at <https://www.costar.com/article/1229547465/this-raleigh-north-carolina-amtrak-station-could-provide-model-for-other-cities>, accessed 8/27/2024; Raleigh Union Station, Raleigh's Modern Train Station and Event Space, available at <https://johnstownpa.gov/wp-content/uploads/2023/05/Project-Description-Train-Station-04.12.23.pdf>, accessed 8/27/2024.

Finally, in its early days, Amtrak produced standard designs for its stations. Many of those stations were denigrated as “Amshacks” for their small sizes, lack of amenities, and unimaginative designs. However, even those stations provided 1,150 square feet of space for 25-50 anticipated passengers and 1,920 square feet of space for 50-150 anticipated passengers. See The Amtrak Standard Stations Program (March 4, 2013) available at <https://history.amtrak.com/blogs/blog/creating-a-visual-identity-the-amtrak-standard-stations-program>, retrieved August 27, 2024. See also Wikipedia

“Amtrak Standard Stations Program” available at [https://en.wikipedia.org/wiki/Amtrak\\_Standard\\_Stations\\_Program#cite\\_note-amtrakhistory-1](https://en.wikipedia.org/wiki/Amtrak_Standard_Stations_Program#cite_note-amtrakhistory-1), retrieved August 27, 2024, for a brief discussion of these stations.

2. Portland’s Amtrak station is a gateway to that City, surrounding regions, and even the State of Maine. Although a palace is not necessary or even desirable, the new station should be designed so that it is welcoming, comfortable, and a place people want to be rather than one that is only used because it must be. This is something that the Saco station, for example, was able to achieve, becoming (at least prior to certain issues that are now, hopefully, being resolved) a community center not just for transportation, but for all of that City’s citizens. Community support for the station should also be sought, perhaps by, for example, seeking donations of time or materials for that station from local businesses. Finally, the station should include shops or other businesses that can provide services to passengers while they travel, further upgrading their travel experiences. This would increase the station size beyond the 2,500 square feet suggested above.
3. NNEPRA has consistently (including on slide 8 of its August 13, 2024 presentation) stated that it is looking for a site that would accommodate 105 parking spots. This is based upon a 2023 VHB survey of Downeaster parking demand at the current station. Downeaster ridership, however, has increased at a substantial rate even from 2023, and, as noted above, is anticipated to continue to rise in the future. True, a West Falmouth station would reduce some of the increase at the Portland station, but it is inevitable that an increase will occur, both because of the popularity of the service as it now exists, as well as through the increase in service arising from additional train trips each day, faster speeds as a result of the installation of PTC and track improvements, and new equipment. Therefore, even if the 105 number is currently correct (and, intuitively, it seems very low), additional parking spots will be needed shortly. Accordingly, the station should include at least 200 parking spots and probably even more, preferably on-site.
4. Finally, the conceptual diagram of the station’s parking lot included as slide 20 of the August 13, 2024 presentation indicates that it may be a long walk (about 500 feet per Google Maps) from some parts of the parking lot to the station. This is already a complaint about the current parking arrangements for the Brunswick station. Given Maine’s inclement weather, particularly in the winter, NNEPRA should, at the very least, include a covered walkway as part of its parking plans for the new station.

TRNE appreciates all of the work that has, thus far, gone into this project and hopes that its comments are helpful and will be given the consideration that they deserve. TRNE understands that the only issue now at hand is whether Site 3 is the appropriate location for the new station. As stated above, TRNE firmly supports that site for the new station, and it makes its additional comments only to ensure that the issues those comments address become part of the ongoing process for the construction of that station.