



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

July 2, 2026

Mr. Dylan Tsolakos
Compliance Bureau Assistant
Oregon State Historic Preservation Office
725 Summer Street NE
Suite C
Salem, OR 97301

Re: Portland & Western Railroad, Inc. – Abandonment Exemption – City of Banks,
Washington County, OR; Surface Transportation Board Docket No. AB 541
(Sub.No. 4X), SHPO Case No. 24-0415. Section 106 Clarification and Agency
Determination

Dear Mr. Tsolakos:

The purpose of this letter is to clarify some inaccurate information in the Section 106 materials previously submitted to your office as part of the environmental and historic review of Portland & Western Railroad's (PNWR) proposed abandonment in the City of Banks, Oregon. In 2024, PNWR filed for authority from the Surface Transportation Board (Board) to abandon a line of railroad extending between Milepost 27.84 and Milepost 27.79, from the middle of NW Banks Road south, a total of approximately 264 feet. The railroad right-of-way is approximately 60 feet wide and is currently paved over as a gravel and asphalt parking area, with no rail-related features present (no rail, ties, ballast, berms, culverts, bridges, buildings, etc.).

In a call on June 26, 2026, the Board's Office of Environmental Analysis (OEA) discussed the proposed abandonment with Sarah Jalving (ODOT/SHPO Liaison), provided an overview of the proposed abandonment, and clarified some inaccurate information in earlier submissions under SHPO Case No. 24-0415. The City of Banks hired a cultural resources consultant to survey and document the Proposed Banks-Veronia Trail Gathering Site (Gathering Site Project) (Applied Archaeological Research (AAR) 2025)) (AAR Report) and included the proposed abandonment in the AAR Report. The Gathering Site Project and the proposed abandonment are two separate undertakings, requiring separate state and federal reviews.

Because the AAR Report conflates the Gathering Site Project and the proposed abandonment, some of the information in the AAR Report is inaccurate. The Area of Potential Effects (APE) in the AAR report appears to depict the Gathering Site Project limits, but the AAR Report also indicates that the APE for the Gathering Site Project (not subject to Board jurisdiction) is the same as the APE for the proposed abandonment (subject to Board jurisdiction). The Gathering Site Project APE includes a section of intact United Railways track which is located

south of, and outside, the APE for the proposed abandonment. In addition, the Gathering Site Project APE's northern boundary follows the south side of NW Banks Road, while the northern boundary of the APE for the proposed abandonment extends to the centerline of NW Banks Road. The APE for the proposed abandonment is now a gravel and asphalt paved open lot, with no railroad-related elements. Therefore, the APE for the proposed abandonment in the AAR Report is incorrect. An accurate map of the correct APE for the proposed abandonment is attached (Attachment 1).

The AAR Report also states that the Gathering Site Project would have a direct and adverse effect on the United Railways track, a National Register-eligible property. The SHPO concurred with these findings on December 5, 2025. As explained above, the United Railways track is located south of the APE for the proposed abandonment and continues as a trail going north, but there are no physical elements of the track within the APE for the proposed abandonment. Thus, based on this information and its own independent review, OEA has determined that the proposed abandonment would have no adverse effect on historic properties.

Thank you for your assistance with this project. We look forward to your concurrence with our determination. If you have any questions, please contact Alan Tabachnick, the Board's Federal Preservation Officer, at 202-934-8469.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Gosselin". The signature is fluid and cursive, with the first name "Danielle" written in a larger, more prominent script than the last name "Gosselin".

Danielle Gosselin
Director
Office of Environmental Analysis

Enclosures:

Attachment 1 – Area of Potential Effects Map for the Proposed Abandonment



Attachment 1 – Area of Potential Effects for Proposed Abandonment (AB 541 4X; SHPO Case # 24-0415) in Banks, Oregon.