

ENTERED
Office of Chief Counsel
December 5, 2025
Part of
Public Record

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December 5, 2025

Alan Tabachnick
Federal Preservation Officer
Surface Transportation Board
Office of Environmental Analysis
395 E St SW
Washington, DC 20423

Re: Portland & Western Railroad, Inc. – Abandonment Exemption –
In Washington County, OR
Surface Transportation Board Docket No. AB 541 (Sub. No. 4X)

Dear Mr. Tabachnick:

On May 31, 2024, the Board issued a decision in the above referenced docket imposing a condition on Portland & Western Railroad, Inc. ("PNWR") for PNWR's abandonment of approximately 264 feet of rail line in Banks, Oregon. The condition requires "that PNWR shall retain its interest in and take no steps to alter the historic integrity of all historic properties, including sites, buildings, structures, and objects within the Area of Potential Effect that are eligible for listing or listed in the National Register until the Section 106 process of the NHPA has been completed."

The decision directed PNWR to "report back to OEA [the Office of Environmental Analysis] regarding any consultations with the SHPO and the public." The purpose of this letter is to provide OEA with a record of PNWR's consultation with the SHPO and the public and to respectfully ask OEA to engage with the Oregon SHPO to permit an expeditious resolution to the condition imposed by the Board that is an impediment to PNWR's abandonment of the rail line.

Background

As stated in PNWR's Notice of Exemption and in the Environmental/Historic Report, PNWR owns an exclusive freight easement over the underlying property. However, the property is owned by the Oregon Department of Transportation ("ODOT") and ODOT is working with the City of Banks so that the City may utilize the property to support an adjoining segment of rail line that is currently operated as a trail under a NITU. Due to the interests of the City in this abandonment, PNWR's efforts to comply with the Board's condition has been supported by the City of Banks.

Consultation

On March 13, 2024, The Oregon SHPO provided PNWR with a letter (included as Exhibit F as part of PNWR's Environmental and Historical Report) in which the Oregon SHPO requested that the project location – the 264 feet of rail line – be investigated for historic properties utilizing a

qualified archeologist. The City of Banks engaged Applied Archaeological Research, Inc. ("AAR") and AAR produced a report, enclosed as Exhibit A, "A Built Environment Study of The Proposed Banks-Veronia Trail Gathering Site, Banks, Washington County, Oregon." In the introduction of the report, AAR indicated that it was hired by the City of Banks and stated that the City intended to utilize the area to be abandoned "for use as a picnicking and gathering area for recreational hiking and bicycling." AAR's report provided its opinion on the eligibility of the Proposed Line as an NRHP-eligible resource and the effect of the City of Banks' proposed project.

On October 15, 2025, PNWR provided a copy, enclosed as Exhibit B, of the AAR report to the Oregon SHPO as well as the Confederated Tribes of Grande Ronde, Confederated Tribes of Siletz Indians, and the Confederated Tribes of the Warm Springs Reservation.

On December 5, 2025, the Oregon SHPO provided PNWR with a response, enclosed as Exhibit C, under Section 106 of the NHPA (36 CFR part 800) addressing eligibility and effect of the PNWR abandonment.

Request to the Board

Now that PNWR – through the City of Banks – has provided the Oregon SHPO with the AAR report analyzing the eligibility and the effect of the proposal and the Oregon SHPO has provided a response, PNWR respectfully requests OEA's involvement in this process to allow for a resolution to this condition so that PNWR may abandonment the freight easement.

Sincerely,



Justin J. Marks
Counsel to Portland & Western Railroad, Inc.

Enclosure

cc: City of Banks
Oregon Department of Transportation

Exhibit A

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October 15, 2025

State Historical Preservation Office
Oregon Heritage
Oregon Parks and Recreation Department
725 Summer Street NE, Suite C
Salem, OR 97301

ORSHPO.Clearance@oregon.gov

Re: SHPO Case No. 24-0415
Portland & Western Railroad, Inc. – Abandonment Exemption –
in Washington County, OR
Surface Transportation Board Docket No. AB 541 (Sub. No. 4X)

To Whom it May Concern:

This letter is to follow up on Koren Tippet's March 13, 2024, letter regarding the Portland & Western Railroad, Inc. ("PNWR") abandonment in Banks, OR. PNWR is proposing to abandon the perpetual freight easement it owns over the Subject Line; the underlying property is owned by the Oregon Department of Transportation ("ODOT"). PNWR has received Surface Transportation Board ("STB") authority for the abandonment of the Subject Line conditioned on consultation with the Oregon SHPO.

The purpose of this letter is to transmit the Built Environment Study as requested by your office that has been conducted by a qualified contractor – Applied Archaeological Research, Inc. The City of Banks, Oregon commissioned this report on behalf of PNWR.

This report and a consultation letter have also been provided to potentially interested Confederated Tribes. Those letters – minus enclosures – are also included with this submission. Please advise on the next steps for this Section 106 process.

Sincerely,



Justin J. Marks
Counsel for Portland & Western, Inc.

Report #

SHPO Use

State Historic Preservation Office Report Cover Page

Year: 2025

Title: A Built-Environment Study of the Proposed Banks-Veronia Trail Gathering Site, Banks, Washington County, Oregon

Author(s): Aimee A. Finley

Agency/Client: Surface Transportation Board/City of Banks

District/Contractor: Applied Archaeological Research, Inc.

Agency/Client Report#: 25-3037a

Project Acres: 0.36

Survey Acres: 0.36

County(ies): Washington

Township:

Range:

Section(s):

Township:

Range:

Section(s):

1 N

2 W

31

Archaeological Permit Number(s):

Accession Number:

Reports submitted to: Tribes: ☐ UOMNCH: ☐ LCIS: ☐

Curation:

Report Addresses Testing: ☐

Have tribes been contacted or consulted? ☐

List tribes:

List any other groups contacted or consulted: SHPO Case No. 24-0415

Report is associated with: PA ☐ MOA ☐

REPORTS WITHOUT A COMPLETE AND ACCURATE COVER PAGE AND APPROPRIATE ADDITIONAL PAGES MAY BE RETURNED. CHECK THE SHPO WEBSITE TO MAKE SURE YOU HAVE THE MOST CURRENT VERSION.

Report #

SHPO Use

State Historic Preservation Office Report Summary of Resources and NRHP Eligibility

Archaeological:

Site: Isolate: Built Environment: TCP: HPRCSIT: Other:

Count: 1

***Please be sure all archaeological forms have been submitted on-line**

***EVALUATE PROPERTIES UNDER ALL FOUR CRITERIA.
BE SURE TO INCLUDE JUSTIFICATION IN THE REPORT***

Oregon
On-Line

Form #: Trinomial: Temp# or Name: Criterion A: Criterion B: Criterion C: Criterion D:

United Railways

Eligible

Not Eligible

Eligible

Not Eligible

A BUILT ENVIRONMENT STUDY OF THE PROPOSED BANKS-VERONIA TRAIL GATHERING SITE, BANKS, WASHINGTON COUNTY, OREGON



By

Aimee A. Finley, M.S.

Prepared for
The city of Banks, Oregon

September 22, 2025

APPLIED ARCHAEOLOGICAL RESEARCH, INC., REPORT NO. 3037a



**Applied
Archaeological
Research, Inc.**

CULTURAL RESOURCE MANAGEMENT
& HISTORIC PRESERVATION

2440 NEM L King Jr Blvd, Ste 202
Portland, OR 97212
503.281.9451

INTRODUCTION

Applied Archaeological Research, Inc. (AAR), under contract to the city of Banks (the city), conducted a cultural resources built-environment study of land proposed for abandonment by the Portland & Western Railroad, Inc. (PNWR) in Banks, Washington County, Oregon (Figure 1). The city plans to acquire a 0.36-acre tract of land along the PNWR rail line that extends southeastward from NW Banks Road for use as a picnicking and gathering area for recreational hiking and bicycling.

The abandonment of land by the PNWR is under the jurisdiction of the Surface Transportation Board (STA), making this project a federal undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. As required under Section 106, the STA must ensure that the development has no adverse effect on historic properties in the area of potential effect (APE) defined for the project. The STA's Office of Environmental Analysis prepared a combined environmental and historic report for the undertaking that was reviewed by the Oregon State Historic Preservation Office (SHPO). The SHPO has requested that the section of the PNWR rail line included in the city's purchase, which was completed ca. 1911 as part of the United Railways railroad, be documented and evaluated for its eligibility for listing on the National Register of Historic Places (NRHP). The SHPO assigned this project Case No. 24-0415. AAR's cultural resource study of the development area was designed to assist the STA in complying with its Section 106 responsibilities and in addressing SHPO's request.

Description of the APE

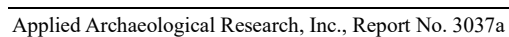
The project APE is in the northern part of the city, in the northwest quarter of Section 31, Township 1 North, Range 2 West, Willamette Meridian. It is immediately south of NW Banks Road and about 100 feet east of the intersection of that road with NW Main Street. It is an unaddressed, irregularly shaped tract of land at the northern end of tax lot 1N20100037000 that extends northwest to southeast along approximately 264 feet (ft) of the PNWR rail alignment (Figure 2). It is bordered by private property to the east and PNWR lands to the south and west.

The APE is 0.36 acre in size and is centered on the PNWR railroad alignment. Its northern half is 60 ft wide measured along its short axis and 230 ft long measured along its long axis. It is an open gravel lot. PNWR railroad tracks that formerly ran along its northern edge have been removed (Figure 3). Intact tracks are present in the southern half, which is 10 ft wide on its short axis, about 188 ft long on its south axis, and comprises solely the PNWR alignment (Figure 4).

HISTORICAL OVERVIEW

History of the United Railways Line

APE lands were included in the 1847 Donation Land Claim (DLC) of Peyton and Anna Wilkes, who are considered the first white settlers in the area (Senz 2022). Lands included in their DLC were made available from the traditional territory of the Atfalati, or Tualatin, tribe of the Kalapuya people, whose numbers had been severely depleted by disease and who were removed to the Grand Ronde Reservation by ca. 1855. In the 1890s, the part of the Wilkes DLC that includes the APE was sold to the Banks family. By 1901, the Banks post office, named for the family, was established following rumors that railroad was planned for the area. The post office gave its name to the community that grew up around it (Senz 2022).



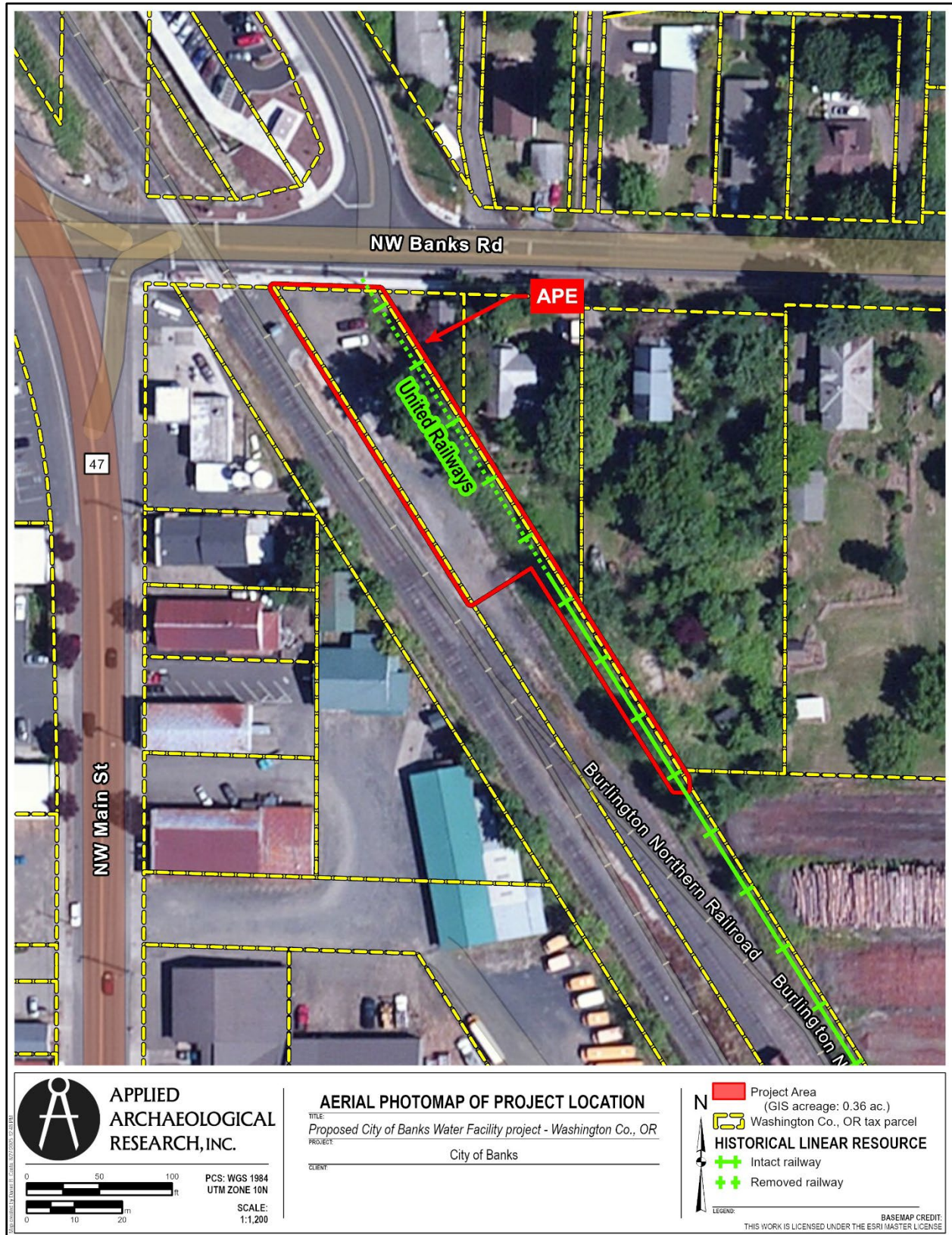


Figure 2. Aerial photomap showing the APE and the location of the removed and intact segments of the PNWR railroad (formerly the United Railways).



Figure 3. Overview of the northern half of the APE where the railroad tracks have been removed. The Oregon Electric Railroad track is visible at frame left. View is north.



Figure 4. Overview of the intact rails in the southern half of the APE. View is north.

The railroad that extends across the project APE was completed ca. 1911 as the United Railway (Demuth and O'Brien 1983). It was designed by John F. Stevens for the United Railway Company and extended approximately 50 miles from Portland to Vernonia and the timberlands surrounding Keasey, Oregon. From its eastern terminus at the North Bank Depot (four blocks west of Union Station) in Portland, the railroad runs north along the west bank of the Willamette River to Burlington, then turns west to cross the West Hills via the Cornelius Pass tunnel to Washington County. The line proceeds generally west through Bower's Junction and North Plains, then turns northwest to Banks and points further north (Demuth and O'Brien 1983).

In 1908, the Oregon Electric Railroad was built between Portland and Eugene via Garden Home, Tigard, and Tualatin in Washington County (McLaughlin and Keeler 1983). A branch line extended west from Garden Home through Hillsboro and Cornelius to Forest Grove. This Forest Grove branch runs parallel to and about six miles south of the United Railways line.

Both railroads struggled financially. By 1910, they had been incorporated into the larger Spokane, Portland, & Seattle rail network owned by James J. Hill, who also owned the Northern Pacific and the Great Northern railroads. In 1913, Hill completed a spur north from Orenco on the Oregon Electric Railroad Forest Grove branch to connect with the United Railways track at Bower's Junction, near the location of the United Railways Smith Trestle, a wooden feature of the railroad that spans Rock Creek. From that point, both railroads shared a corridor running northwest to Vernonia (McLaughlin and Keeler 1983).

Between 1964 and 1969, the non-profit Vernonia, South Park & Sunset Steam Railroad, Inc. operated a steam powered excursion service between Banks and Vernonia (Edwards 2025). In 1970, the Spokane, Portland & Seattle, the Great Northern, and the Northern Pacific lines were merged to form the Burlington Northern railroad. Later, the rail corridor south of Banks was transferred to the PNWR, the current owners.

The railroad lines north of Banks were abandoned and their rails were salvaged in 1973. The right-of-way was sold to the state in 1974 and transferred to the Oregon Parks and Recreation Department (OPRD) in 1990 (OPRD 2025). In 2014, the approximately 21-mile-long segment of the railroad alignment between Banks and Vernonia was converted to the Banks-Vernonia State Trail, Oregon's first rails-to-trail linear state park.

The United Railways railroad, the Smith Trestle, and the Oregon Electric Railroad have all been determined to be eligible for inclusion in the NRHP, although they have not been formally nominated. Each was included in the Oregon Historic Sites Database as eligible/contributing resources in 1983 (Demuth and O'Brien 1983; McLaughlin and Keeler 1983; O'Brien and Keeler 1983).

HISTORIC-ERA RESOURCES IN THE DEVELOPMENT SITE

As part of the proposed gathering site project, the PNWR railroad alignment in the APE would be abandoned. As part of the United Railways railroad, it is eligible to be considered for inclusion in the NRHP. It would be directly impacted by the project. A documentation form for this resource is appended to this report (Appendix A).

Physical Description of the United Railways Line in the APE

The United Railways alignment extends through the project APE, although its tracks have been removed from the northern part. Their removal likely occurred ca. 1973, when the rails between Banks

and Vernonia were salvaged. To the north, the rail corridor has been converted to recreational use as the Banks-Vernonia Rail Trail. To the south the tracks continue toward Portland. To the west, the Oregon Electric Railroad tracks run parallel to the Smith Trestle at Bower's Junction. To the east, lands have been developed into residential, commercial, and light industrial uses. Within the APE, the railroad alignment is at grade and is not built on a berm. The ground surface is covered with gravel ballast, although it is partly overgrown by vegetation.

Currently, the United Railways corridor comprises 180 ft of existing track and 230 ft of removed track. Where extant, the tracks include metal rails, wood ties, metal spikes, and fastener plates. The tracks are set on a bed of crushed rock. The ties are about nine inches wide and nine ft long. The rails are about five inches in height and are spaced about five ft apart. The rails are composed of roughly 25-foot-long sections that are staggered along the rail so that the fastener plates for the left rail are offset from those of the right rail. No manufacturer or date stamps were observed on the visible parts of the rails and plates.

Character-defining features of the United Railways track include its linear orientation, its spatial relationship to the adjacent Oregon Electric Railroad tracks, and its original, fabric-like rails and ties.

EVALUATION OF NRHP ELIGIBILITY

The United Railways track was documented in 1983 and was determined eligible for inclusion in the NRHP as an eligible/contributing resource (Demuth and O'Brien 1983). At the time of that assessment, the rails north of Banks had been salvaged in advance of the establishment of the Banks-Vernonia State Trail. Due to the length of time elapsed since the first assessment was completed, a review of the resource and its NRHP eligibility was reconsidered as part of the current project.

The United Railways track's eligibility for inclusion in the NRHP, either individually or as part of a district, is based on its age, significance, and integrity. When assessed within its appropriate historical context, the track must retain its historical integrity and meet at least one of four registration criteria.

The United Railways track may be eligible for inclusion in the NRHP under Criterion A at the local level for its historical association with the development of Banks and the economic growth of the region in the early twentieth century. This includes the entirety of the United Railways track, not just that portion within the APE.

The United Railways track is not the best representation of an association with a person important to history; its NRHP eligibility under Criterion B is not supported.

The United Railways track may be eligible for inclusion in the NRHP under Criterion C for its design, which reflects distinctive characteristics of early-twentieth-century railroad siding construction methods. According to SHPO guidance documents, the vast majority of decommissioned or abandoned railroads typically had rails and ties removed or recovered for use elsewhere. The loss of these elements, while affecting the integrity of the resource, does not preclude its NRHP eligibility (SHPO 2013).

As a built-environment resource, the United Railways track has very little potential to yield information important to our understanding of history; its NRHP eligibility under Criterion D is not applicable.

To support its NRHP eligibility, the United Railways track must retain integrity by demonstrating a clear relationship between its historical significance and its physical features, such that it would be recognizable to an historical contemporary. The seven aspects of integrity are location, design, setting,

materials, workmanship, feeling, and association. It should be noted that only the roughly 410-foot-long section of the railroad located within the APE was directly examined as part of this study. The following description of its integrity is limited to this section.

The United Railways track is in its original location beside the Oregon Electric Railroad track. It passes through the center of Banks, a city that developed as a direct result of the railroad's presence. Its integrity of setting, feeling, and association remain intact. Previous removal of at least 180 ft of rail within the project APE (and the removal of 21 miles of rail connecting to Vernonia) has impacted its integrity of design, materials, and workmanship. However, the remaining parts of the United Railways track retain sufficient historic fabric to demonstrate its historical significance.

The United Railways track meets the age threshold for inclusion in the NRHP. It meets the registration requirements under Criterion A, in accordance with Oregon SHPO guidance regarding linear resources like railroads. It is significant at the local level for the period between ca. 1911, when it was completed, to 1973, when the line was decommissioned and rails were salvaged. Its integrity has been impacted by previous removal of rails, which has likely diminished its ability to be NRHP eligible as an individual resource under Criterion C. However, the United Railways track would be clearly eligible for inclusion in the NRHP, under both Criteria A and C, as part of a railroad-related historic district, if one is defined in the future.

DETERMINATION OF PROJECT EFFECTS

The proposed Banks-Veronia State Trail gathering area project would have a direct and adverse effect on the United Railways track, an NRHP-eligible historic property. Developments in the northern part of the APE (where the rails have already been removed) would further obscure the rail corridor's association with the railroad network. Developments in the southern part could result in the loss of an intact rail segment. This effect would be cumulative, since the north end of the railroad has already been truncated by 21 miles.

SUMMARY AND RECOMMENDATIONS

The proposed acquisition and development of the APE would have a direct, adverse effect on the United Railways track, an NRHP-eligible resource. If impacts cannot be avoided, mitigating measures can be taken to partially compensate for project-related effects. Mitigating measures are meant to preserve and document affected resources for the public's education and appreciation. Examples of such measures can include (but are not limited to):

- Documenting the entirety of the United Railways track through research, maps, and photographs;
- Providing interpretation of the railroad history with text and photographs on an informational placard or signpost, either onsite or in association with the adjacent Banks-Veronia State Trail;
- Incorporating the removed metal rails in landscaping or other project designs;
- depicting the routes of the removed portions of the sidings in contrasting color or texture through the paved parking lot; and/or
- offering public access to the information included in this and previous documentation projects.

Furthermore, the proposed project will have no direct or indirect impacts on the nearby Oregon Electric Railroad track. As an engineering feature, its viewshed does not contribute to the characteristics that make it eligible for inclusion in the NRHP.

REFERENCES CITED

Demuth and O'Brien

1983 Washington County Cultural Resource Inventory, United Railway, Resource ID 48159. On file, Oregon State Historic Preservation Office, Salem.

Edwards, Brian

2025 The United Railways, Banks to Keasey, OR. Electronic document, https://www.abandonedrails.com/united-railways#google_vignette, accessed August 17, 2025.

McLaughlin and Keeler

1983 Washington County Cultural Resource Inventory, Oregon Electric Railroad, Resource ID 48158. On file, Oregon State Historic Preservation Office, Salem.

O'Brien and Keeler

1983 Washington County Cultural Resource Inventory, Smith Trestle, Resource ID 48157. On file, Oregon State Historic Preservation Office, Salem.

Oregon State Historic Preservation Office (SHPO)

2013 Guidance for Recording and Evaluating Linear Cultural Resources. On file, Oregon State Historic Preservation Office, Salem.

Oregon Parks and Recreation Department (OPRD)

2025 Banks-Vernonia State Trail. Electronic document, <https://stateparks.oregon.gov/index.cfm?do=park.profile&parkId=104>, accessed August 17, 2025.

Senz, Paul

2022 City of Banks. Electronic document, https://www.oregonencyclopedia.org/articles/banks_city_of/, accessed August 17, 2025.

Appendix A

Documentation Form

United Railways

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
Project Name: Banks-Veronia Trail Gathering Site		Agency project #:
Agency: City of Banks / Surface Transportation Board		SHPO Case#: 24-0415
Location Coordinates (to sixth decimal place): Latitude: 45.621700 Longitude: 123.113900		Is the property listed in the National Register of Historic Places? ☐ YES – Individually ☒ NO ☐ YES – In a district



United Railways corridor with tracks removed. View to north

Surveyor: Aimee Finley	Date Recorded: 08-25-2025
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National Register Findings:

☒ **Eligible:**
 ☒ Individually
 ☒ As part of District
 NR Criteria: ☒ A
 ☐ B
 ☒ C
 ☐ D
☐ **Not Eligible:**
☐ Irretrievable integrity loss
☐ Not 50 Years
☐ Fails to meet NR Criteria

Finding of Effect:

☐ No Effect
☐ No Adverse Effect
☒ Adverse Effect

State Historic Preservation Office Comments – Official Use Only:

Eligibility: ☐ Concur ☐ Do Not Concur:

Effect: ☐ Concur ☐ Do Not Concur:

RECEIVED STAMP

Signed _____ Date _____

CONTACT INFORMATION STAMP

Comments:

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: United Railways		Street Address: NW Banks Road		City, County: Banks, Washington County	
Original Use: Trans: Rail Related			Number of Associated Resources: 1		
Architectural Classification / Resource Type: Not Applicable Structure			Owner: ☒ Private ☐ Local Government ☐ State ☐ Federal		
Window type and Materials: Not Applicable			Exterior Surface Materials: Primary: Metal: Other/undefined Secondary: Wood: Other/undefined Decorative: -select materials-		
Roof Type and Materials: Not Applicable					
Integrity: ☐ Excellent ☒ Good ☐ Fair ☐ Poor			Construction Date: 1911 (☒ Circa)		
			Architect/Builder (if known): John F. Stevens, United Railways Engineer		
Description of Property (including previous alterations & approximate dates):					
The United Railways alignment extends through the the project APE. While the tracks are still present in the southern part of the APE, they have been removed from the northern part. This likely occurred ca. 1973, when the rails between Banks and Vernonia were salvaged. To the north, the rail corridor has been converted to recreational use as the Banks-Vernonia Rail Trail. To the south the tracks continue toward Portland. To the west, the Oregon Electric Railroad tracks share the corridor to the Smith Trestle at Bower's Junction. To the east, lands have been developed into residential, commercial, and light industrial uses. Within the APE, the railroad alignment is at grade and is not built on a berm. The ground surface is covered with gravel ballast, although it is partly overgrown by vegetation. Currently, the United Railways corridor comprises 180 feet of existing track and 230 feet of removed track. Where extant, the tracks include metal rails, wood ties, and metal spikes and fastener plates. The tracks are set on a bed of crushed rock. (see continuation sheet)					
Determination of Eligibility, Justification, and Sources (Use continuation sheets if necessary):					
History of the United Railways Line					
The APE is located within the 1847 Donation Land Claim of Peyton and Anna Wilkes, who are considered the first white settlers in the area (Senz 2022). These lands were made available from the traditional territory of the Atfalati, or Tualatin, tribe of the Kalapuya people, whose numbers had been severely depleted by disease and who were removed to the Grand Ronde Reservation by ca. 1855. In the 1890s, the part of the Wilkes property that includes the project area was sold to the Banks family. By 1901, rumors of a planned railroad in the area led to the establishment of the Banks post office, which gave its name to the community that grew up around it (Senz 2022). The railroad located in the project APE was completed ca. 1911 as the United Railway (Demuth and O'Brien 1983). It was designed by John F. Stevens for the United Railway Company and extended approximately 50 miles from Portland to Vernonia and the timberlands surrounding Keasey, Oregon. From its eastern terminus at the North Bank Depot (four blocks west of Union Station) in Portland, the railroad runs north along the west bank of the Willamette River to Burlington, then turns west to cross the West Hills via the Cornelius Pass tunnel to Washington County. The line proceeds generally west through Bower's Junction and North Plains, then turns northwest to Banks and points further north (Demuth and O'Brien 1983). (see continuation sheet)					

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
Description of project scope, and nature and extent of impacts: The City of Banks plans to acquire a parcel proposed for abandonment by the Portland & Western Railroad, Inc. (PNWR) for use as a picnicking and gathering area. The city's proposed acquisition will include a tract of land along the PNWR rail line that extends southeastward from NW Banks Road. The abandonment of land by the PNWR is under the jurisdiction of the Surface Transportation Board (STA), making this project a federal undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. As required under Section 106, the STA must ensure that the development has no adverse effect on historic properties in the area of potential effect (APE) defined for the project. The Oregon State Historic Preservation Office (SHPO) has requested that the section of the PNWR rail line included in the purchase be documented and evaluated for its eligibility for listing on the National Register of Historic Places (NRHP). This cultural resource study will aid the federal funding agency in complying with its Section 106 responsibilities and in addressing SHPO's request.		
Finding of Effect and justification: The proposed recreational gathering site project would have a direct and adverse effect on the United Railways track, an NRHP-eligible historic property. Developments in the northern part of the APE (where the rails have already been removed) would further obscure the rail corridor's association with the railroad network. Developments in the southern part could result in the loss of an intact rail segment. This effect would be cumulative, since the north end of the railroad has already been truncated by 21 miles. If impacts cannot be avoided, mitigating measures can be taken to partially compensate for project-related effects. Mitigating measures are meant to preserve and document affected resources for the public's education and appreciation. The proposed project will have no direct or indirect impacts on the nearby Oregon Electric Railroad track. As an engineering feature, its viewshed does not contribute to the characteristics that make it eligible for inclusion in the NRHP.		

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
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View: Overview of intact United Railways rails in the southern part of the APE. View is to the north.



View: Detail of the United Railways track.

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
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**APPLIED
ARCHAEOLOGICAL
RESEARCH, INC.**

0 50 100
ft

0 10 20
m

PCS: WGS 1984
UTM ZONE 10N

SCALE:
1:1,200

AERIAL PHOTOMAP OF PROJECT LOCATION

TITLE:
Proposed City of Banks Water Facility project - Washington Co., OR

PROJECT:
City of Banks

CLIENT:

N

Project Area
(GIS acreage: 0.36 ac.)
Washington Co., OR tax parcel

HISTORICAL LINEAR RESOURCE

++ Intact railway
++ Removed railway

LEGEND:

BASEMAP CREDIT:
THIS WORK IS LICENSED UNDER THE ESRI MASTER LICENSE

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties
Continuation Sheet

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
(Cont.) Description of Property, continued: The ties are about nine inches wide and nine feet long. The rails are about five inches in height and are spaced about five feet apart. The rails are comprised of ca. 25-foot-long sections. The 25-foot-long sections are staggered along the rail, so that the fastener plates for the left rail are offset from those of the right rail. No manufacturer or date stamps were observed on the visible parts of the rails and plates. Character-defining features of the United Railways track include its linear orientation, its spatial relationship to the adjacent Oregon Electric Railroad tracks, and its original fabric like rails and ties. Determination of Eligibility, Justification, and Sources, continued: In 1908 the Oregon Electric Railroad was built between Portland and Eugene via Garden Home, Tigard, and Tualatin in Washington County (McLaughlin and Keeler 1983). A branch line extended west from Garden Home through Hillsboro and Cornelius to Forest Grove. This Forest Grove branch runs parallel to and about six miles south of the United Railways line. Both railroads struggled financially. By 1910, they had been incorporated into the larger Spokane, Portland, & Seattle rail network owned by James J. Hill, who also owned the Northern Pacific and the Great Northern railroads. In 1913, Hill completed a spur north from Orenco on the Oregon Electric Railroad Forest Grove branch to connect with the United Railways track at Bower's Junction, near the location of the United Railways Smith Trestle, a wooden feature of the railroad which spans Rock Creek (O'Brien and Keeler 1983). From this point, both railroads shared a corridor northwest to Vernonia (McLaughlin and Keeler 1983). In 1964, the non-profit Vernonia, South Park & Sunset Steam Railroad, Inc. operated a steam powered excursion service between Banks and Vernonia between 1964 and 1969 (Edwards 2025). In 1970, the Spokane, Portland & Seattle, the Great Northern, and the Northern Pacific lines were merged to form the Burlington Northern railroad. At a later date, the rail corridor south of Banks was transferred to the PNWR, the current owners. The railroad lines north of Banks were abandoned and their rails were salvaged in 1973. The right-of-way was sold to the state in 1974 and transferred to the Oregon Parks and Recreation Department (OPRD) in 1990 (OPRD 2025). In 2014, the approximately 21-mile-long segment of the railroad alignment between Banks and Vernonia was converted to the Banks-Vernonia State Trail, Oregon's first rails-to-trail linear state park. The United Railways railroad, the Smith Trestle, and the Oregon Electric Railroad have all been determined to be eligible for inclusion in the National Register of Historic Places (NRHP), although they have not been formally nominated. Each was included in the Oregon Historic Sites Database as eligible/contributing resources in 1983 (Demuth and O'Brien 1983; McLaughlin and Keeler 1983; O'Brien and Keeler 1983).		

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties
Continuation Sheet**

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
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(Cont.)

NRHP-ELIGIBILITY EVALUATION

The United Railways track was documented in 1983 and was determined eligible for inclusion in the NRHP as an eligible/contributing resource (Demuth and O'Brien 1993). At the time of that assessment, the rails north of Banks had been salvaged in advance of the establishment of the Banks-Vernonia State Trail. Due to the length of time elapsed since the first assessment was completed, a review of the resource and its NRHP-eligibility was reconsidered as part of the current project.

The United Railways track's eligibility for inclusion in the NRHP, either individually or as part of a district, is based on its age, significance, and integrity. When assessed within its appropriate historical context, the track must retain its historical integrity and meet at least one of four registration criteria.

The United Railways track may be eligible for inclusion in the NRHP under Criterion A at the local level for its historical association with the development of Banks and the economic growth of the region in the early twentieth century. This includes the entirety of the United Railways track, not just that portion within the APE.

The United Railways track is not the best representation of an association with a person important to history; its NRHP-eligibility under Criterion B is not supported.

The United Railways track may be eligible for inclusion in the NRHP under Criterion C for its design, which reflects distinctive characteristics of early-twentieth-century railroad siding construction methods. According to SHPO guidance documents, the vast majority of decommissioned or abandoned railroads typically had rails and ties removed or recovered for use elsewhere. The loss of these elements, while affecting the integrity of the resource, does not preclude eligibility for listing in the NRHP (SHPO 2013).

As a built-environment resource, the United Railways track has very little potential to yield information important to our understanding of history; its NRHP-eligibility under Criterion D is not applicable.

To support its NRHP eligibility, the United Railways track must retain integrity by demonstrating a clear relationship between its historical significance and its physical features, such that it would be recognizable to an historical contemporary. The seven aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. It should be noted that only the ca. 410-foot-long section of the railroad located within the project area was directly examined as part of this study. The following description of its integrity is limited to this section.

The United Railways track is in its original location beside the Oregon Electric Railroad track. It passes through the center of Banks, a city that developed as a direct result of the railroad's presence. Its integrity of setting, feeling, and association remain intact. Previous removal of at least 180 feet of rail within the project APE (and the removal of 21 miles of rail connecting to Vernonia), has impacted its integrity of design, materials, and workmanship. However, the remaining parts of the United Railways track retain sufficient historic fabric to demonstrate its historical significance.

OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties
Continuation Sheet

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
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(Cont.) NRHP-ELIGIBILITY EVALUATION

The United Railways track meets the age threshold for inclusion in the NRHP. It meets the registration requirements under Criterion A, in accordance with OR SHPO guidance regarding linear resources like railroads. It is significant at the local level for the period between ca. 1911, when it was completed, to 1973, when the line was decommissioned and rails were salvaged. Its integrity has been impacted by previous removal of rails, which has likely diminished its ability to be NRHP-eligible as an individual resource under Criterion C. However, the United Railways track would be clearly eligible for inclusion in the NRHP, under both Criteria A and C, as part of a railroad-related historic district, if one is defined in the future.

Sources:

Demuth and O'Brien
1983 Washington County Cultural Resource Inventory, United Railway, Resource ID 48159. On file, Oregon State Historic Preservation Office, Salem.

Edwards, Brian
2025 The United Railways, Banks to Keasey, OR. Electronic document, https://www.abandonedrails.com/united-railways#google_vignette, accessed August 17, 2025.

Kamholz, Edward
2022 Oregon-American Lumber Company. Electronic document, https://www.oregonencyclopedia.org/articles/oregon_american_lumber_company/, accessed August 17, 2025.

McLaughlin and Keeler
1983 Washington County Cultural Resource Inventory, Oregon Electric Railroad, Resource ID 48158. On file, Oregon State Historic Preservation Office, Salem.

O'Brien and Keeler
1983 Washington County Cultural Resource Inventory, Smith Trestle, Resource ID 48157. On file, Oregon State Historic Preservation Office, Salem.

Oregon State Historic Preservation Office (SHPO)
2013 Guidance for Recording and Evaluating Linear Cultural Resources. On file, Oregon State Historic Preservation Office, Salem.

Oregon Parks and Recreation Department (OPRD)
2025 Banks-Vernonia State Trail. Electronic document, <https://stateparks.oregon.gov/index.cfm?do=park.profile&parkId=104>, accessed August 17, 2025.

Senz, Paul
2022 City of Banks. Electronic document, https://www.oregonencyclopedia.org/articles/banks_city_of/, accessed August 17, 2025.

Exhibit B

[enclosures not included]

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Email:jjmarks@ClarkHill.com

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1001 Pennsylvania Avenue N.W.
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Washington, DC 20004
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F (202) 772-0919

October 15, 2025

Transmitted via email

Confederated Tribes of Siletz Indians
P.O. Box 549
Siletz, OR 97380

culturalresources@ctsi.nsn.us

Re: Portland & Western Railroad, Inc. – Abandonment Exemption –
in Washington County, OR
Surface Transportation Board Docket No. AB 541 (Sub. No. 4X)

To Whom it May Concern:

This letter is to advise you that Portland & Western Railroad, Inc. ("PNWR") received authority to abandon a segment of rail line extending approximately 264 feet between Milepost 27.84 and Milepost 27.79 in Banks, OR (the "Subject Line"). PNWR is seeking to abandon the perpetual freight easement it owns over the Subject Line; the underlying property is owned by the Oregon Department of Transportation ("ODOT"). The Subject Line traverses through United States Postal Service ZIP Code 97106 entirely in Washington County, OR.

PNWR has received Surface Transportation Board ("STB") authorization for its abandonment conditioned on its completion of the Section 106 process. As part of the Section 106 process, PNWR is consulting with the Oregon State Historic Preservation Office ("SHPO"). The SHPO requested an inventory of potential historic properties and a formal determination as to PNWR's eligibility for National Register of Historic Places. PNWR – through the City of Banks – has completed the SHPO's requests. Enclosed with this letter is a map of the subject line, a copy of the STB's order imposing the condition and a copy of the report prepared at the request of the SHPO.

As part of the Section 106 process, PNWR is providing this letter to you as to any concerns which you may have as to any effects of the abandonment on historical resources. I would appreciate an expression from you by November 15, 2025 raising any concerns you may have or confirmation that you do not perceive the abandonment to have a negative impact.

If you have any questions about the railroad's abandonment, please call me at (202) 772-0916. Thank you for your cooperation.

October 15, 2025
Page 2

Sincerely,



Justin J. Marks
Counsel for Portland & Western, Inc.

Enclosure

cc: Oregon State Historic Preservation Office
City of Banks



Justin J. Marks
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Email:jjmarks@ClarkHill.com

Clark Hill
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Suite 1300 South
Washington, DC 20004
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F (202) 772-0919

October 15, 2025

Transmitted via email

Confederated Tribes of the Warm Springs Reservation
Lawrence Squiemphen III
Tribal Historic Preservation Officer
P.O. Box C, Warm Springs, OR 97761

106review@ctwsbnr.org

Re: Portland & Western Railroad, Inc. – Abandonment Exemption –
in Washington County, OR
Surface Transportation Board Docket No. AB 541 (Sub. No. 4X)

Dear Sir:

This letter is to advise you that Portland & Western Railroad, Inc. ("PNWR") received authority to abandon a segment of rail line extending approximately 264 feet between Milepost 27.84 and Milepost 27.79 in Banks, OR (the "Subject Line"). PNWR is seeking to abandon the perpetual freight easement it owns over the Subject Line; the underlying property is owned by the Oregon Department of Transportation ("ODOT"). The Subject Line traverses through United States Postal Service ZIP Code 97106 entirely in Washington County, OR.

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If you have any questions about the railroad's abandonment, please call me at (202) 772-0916. Thank you for your cooperation.

October 15, 2025
Page 2

Sincerely,



Justin J. Marks
Counsel for Portland & Western, Inc.

Enclosures

cc: Oregon State Historic Preservation Office
City of Banks



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October 15, 2025

Transmitted via email

Confederated Tribes of Grand Ronde
Briece Edwards
Deputy Tribal Historic Preservation Officer, Manager of Historic Preservation Office
9615 Grand Ronde Road
Grand Ronde, OR 97347

thpo@grandronde.org

Re: Portland & Western Railroad, Inc. – Abandonment Exemption –
in Washington County, OR
Surface Transportation Board Docket No. AB 541 (Sub. No. 4X)

To Whom it May Concern:

This letter is to advise you that Portland & Western Railroad, Inc. ("PNWR") received authority to abandon a segment of rail line extending approximately 264 feet between Milepost 27.84 and Milepost 27.79 in Banks, OR (the "Subject Line"). PNWR is seeking to abandon the perpetual freight easement it owns over the Subject Line; the underlying property is owned by the Oregon Department of Transportation ("ODOT"). The Subject Line traverses through United States Postal Service ZIP Code 97106 entirely in Washington County, OR.

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If you have any questions about the railroad's abandonment, please call me at (202) 772-0916. Thank you for your cooperation.

October 15, 2025
Page 2

Sincerely,

A handwritten signature in blue ink, reading "Justin J. Marks". The signature is fluid and cursive, with the first name "Justin" and last name "Marks" clearly legible.

Justin J. Marks
Counsel for Portland & Western, Inc.

Enclosures

cc: Oregon State Historic Preservation Office
City of Banks

Exhibit C

**OREGON INVENTORY OF HISTORIC PROPERTIES
SECTION 106 DOCUMENTATION FORM
Individual Properties**

Property Name: United Railways	Street Address: NW Banks Road	City, County: Banks, Washington County
Project Name: Banks-Veronia Trail Gathering Site		Agency project #:
Agency: City of Banks / Surface Transportation Board		SHPO Case#: 24-0415
Location Coordinates (to sixth decimal place): Latitude: 45.621700 Longitude: 123.113900		Is the property listed in the National Register of Historic Places? ☐ YES – Individually ☒ NO ☐ YES – In a district



United Railways corridor with tracks removed. View to north

Surveyor: Aimee Finley	Date Recorded: 08-25-2025
National Register Findings: ☒ Eligible: ☒ Individually ☒ As part of District NR Criteria: ☒ A ☐ B ☒ C ☐ D ☐ Not Eligible: ☐ Irretrievable integrity loss ☐ Not 50 Years ☐ Fails to meet NR Criteria	Finding of Effect: ☐ No Effect ☐ No Adverse Effect ☒ Adverse Effect

State Historic Preservation Office Comments – Official Use Only:

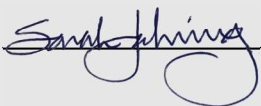
Eligibility: ☒ Concur

☐ Do Not Concur:

Effect: ☒ Concur

☐ Do Not Concur:

RECEIVED STAMP

Signed 

Date 12/5/2025

CONTACT INFORMATION STAMP

Comments: