

TO: HISTORIC LANDMARKS COMMISSION

THROUGH: Lisa Anderson-Ogilvie, AICP, Deputy Community Development Director and Planning Administrator

FROM: Kimberli Fitzgerald, AICP, Historic Preservation Officer
Jake Morris, PhD, Historic Preservation Planner

SUBJECT: Willamette National Cemetery Expansion Project – Section 106 Consultation – 3515 Howell Prairie Rd. Salem, OR

ISSUE:

Initiation of Consultation under Section 106 of the National Historic Preservation Act (NHPA) for the Willamette National Cemetery Expansion located at 3515 Howell Prairie Rd., Salem Oregon

RECOMMENDATION:

Information Report Only.

SUMMARY AND BACKGROUND:

The applicant, the Department of Veterans Affairs National Cemetery Administration (VA), is proposing a new undertaking which will involve acquiring and constructing an expansion of the Willamette National Cemetery. While this cemetery and the proposed Area of Potential Effect (APE) are located outside the city limits of Salem, the City of Salem's Historic Landmark's Commission, a Certified Local Government, has been identified as a consulting party regarding the proposed undertaking.

FACTS AND FINDINGS:

I. Determination(s) of Eligibility

The applicant has defined the APE as the 307-acre parcel proposed for acquisition along with a one-kilometer buffer around its perimeter as the area that has been identified for evaluation of impacts to historic and cultural resources. In December 2024 the VA contracted a consultant to complete a Cultural Resources Preliminary Report and a Phase I archaeological survey. Based upon these evaluations the VA has determined that the Daniel and Melinda Waldo House (c 1854) is eligible for listing on the National Register of Historic Places and that the railroad adjacent to the western border of the parcel is also eligible for the National Register.

A. Daniel and Melinda Waldo House. 8382 Jordan Street SE.

The applicant notes that the Daniel Waldo House was previously determined eligible by the Oregon SHPO for listing in the National Register of Historic Places in 2013 after the completion of a historic survey. However, the resource was evaluated under the following general National Register eligibility categories:

1. **Age.** The resource was constructed c. 1854
2. **Criteria A-Events:** The Waldo family came to Oregon during the great migration in 1843. In 1843 they brought 68 head of cattle to the Oregon territory.
3. **Criteria B- Person:** Daniel and Melinda Waldo. They obtained a Donation Land Claim in the Willamette Valley and after initially building a temporary log cabin, built a larger log cabin in 1844. Ten years later they built the existing house. Daniel Waldo owned slaves before 1830, but after that date he no longer held slaves – and in fact provided refuge and support for Black pioneers in the Territory at a time when Oregon's exclusion laws banned Blacks from residing in the Territory.
4. **Criteria C- Architectural Style:** Federal Revival (Elements of Classical Revival). The 1854 structure is 46' by 19' on a concrete foundation, with identical red brick chimneys at either end and clad in wood (milled lumber) with articulated eaves. A second structure was built after the turn of the century (c1901) and is connected to the earlier structure with a carport awning.
5. **Integrity:** The Waldo House is one of the oldest remaining houses in Marion County from the early Euro-American settlement period in the 19th Century. Although the building is missing the original front porch and the windows and doors are currently boarded up- the resources retains substantial integrity despite being in poor condition.

B. Railroad

The applicant's consultant evaluated this resource utilizing SHPO's 2013 *Guidance for Recording and Evaluating Linear Resources*. They considered the resource's eligibility under the following general National Register eligibility categories:

1. **Age.** The resource was constructed c. 1878
2. **Criteria A- Events:** This portion of the railway represents a significant contribution to the broad patterns of local history due to its association with transportation and commerce. This segment of the railroad was chartered by Union Pacific in 1878 as a short line connecting Woodburn, north of the current parcel, to Stayton. The railway was acquired by Southern Pacific. This line was used to transport lumber, plywood, grain and other agricultural products throughout the late 19th and early 20th Centuries. In 1993 Southern Pacific leased this line to the Willamette Valley Railway. The line continues to operate between Woodburn and Silverton.

- 3. Integrity:** This segment of railroad retains sufficient integrity to convey its significance. Portions of the line have been replaced over time, as part of routine maintenance of the line, however the replacement(s) utilize in-kind materials and are substantially the same design.

Determination of Effects & Mitigation Required.

The applicant is proposing to demolish the Daniel and Melinda Waldo House as part of the redevelopment of the site for use as a cemetery. The applicant is planning to avoid impacting the railroad, as it runs adjacent to the property. The funding for the proposed project includes federal funds and these federal funds trigger a review under the National Historic Preservation Act, Section 106. Should the Oregon SHPO concur with the VA that both identified resources are currently eligible for listing on the National Register of Historic Places and further concur that the proposed undertaking (project) will constitute an adverse effect to the Daniel and Melinda Waldo House, mitigation pursuant to 36 CRF 800.5(d)(2) will be required. The VA plans to resolve the adverse effect through development of mitigation in a Memorandum of Agreement.

SRC 230.082. Public Historic Mitigation.

While the applicant has not yet developed a mitigation plan, in order to develop the appropriate mitigation, the applicant is required to obtain input from relevant stakeholders. Salem Revised Code 230.082, Table 230-5 outlines the appropriate level of mitigation that public agencies should offer based upon the activity proposed. In this particular case, the proposed demolition is a Level Three Adverse Effect with required documentation of the resource; development of both on site and digital educational materials as well as a donation to Salem's Historic Preservation fund.

HLC Alternatives

The applicant has requested the HLC review of Determinations of Eligibility and Findings of Effect and either concur (or not) with their determination(s). The HLC does not have the authority to make any final determination of findings, however the HLC has the following alternatives:

- 1. No Action.** The HLC is not required to take any action or make any comment regarding the VA's Determination of Eligibility.
- 2. Letter of Support/Opposition.**
 - A.** Should the HLC concur with the VA's Determination(s) of Eligibility, the HLC can authorize staff to draft a letter to be sent to the VA Federal Preservation Officer.
 - B.** Alternatively, should the HLC believe that these resource(s) are not eligible for the National Register, the HLC can authorize staff to draft a letter to be

sent to the VA Federal Preservation Officer stating that the HLC does not concur.

Attachments:

- (A) March 2, 2026 letter from VA Federal Preservation Officer and Map
- (B) Waldo House- History and Eligibility- Excerpt
- (C) Willamette Valley Railroad Segment- History and Eligibility



DEPARTMENT OF VETERANS AFFAIRS
NATIONAL CEMETERY ADMINISTRATION
Design and Construction Service
Washington DC 20420

March 2, 2026

Kimberli Fitzgerald, Historic Preservation Officer
City of Salem
555 Liberty Street SE
Suite 305
Salem, OR 97301
kfitzgerald@cityofsalem.net

RE: Initiation of NHPA Section 106 Consultation for the Proposed Willamette National Cemetery Expansion Project in Salem, Marion County, Oregon (SHPO Case No. 25-2299)

Dear Ms. Fitzgerald:

To fulfill its mission to honor Veterans and ensure continued interment availability, the U.S. Department of Veterans Affairs (VA) has determined that there is a need to expand Veteran burial options within the Willamette Valley region. VA remains committed to honoring our Nation's Veterans by constructing an expansion cemetery for the Willamette National Cemetery.

VA, pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800), is initiating Section 106 consultation for the above-referenced project.

The undertaking is defined as the proposed acquisition of a parcel and the subsequent construction and operation of the Willamette National Cemetery expansion. VA is considering the following location for potential development and construction of the approximately 307-acre cemetery expansion:

- 3515 Howell Prairie Road, Salem, Marion County, Oregon

The Area of Potential Effects (APE) has been defined as the 307-acre proposed acquisition parcel, inclusive of the railroad that aligns with its western border (Attachment 1). A one-kilometer buffer was also searched surrounding the parcel to identify any additional cultural resources or historic properties.

In December 2024, VA contracted for a Cultural Resources Preliminary Report (Attachment 2) and Phase I Archaeological Survey (Attachment 3) of the APE. All work was conducted in accordance with the most recent guidelines promulgated by the Oregon State Historic Preservation Office.

VA determined that the Daniel and Melinda Waldo House (c. 1854), located within the central portion of the proposed acquisition parcel, is eligible for listing in the National Register of Historic Places (NRHP) under Criteria A, B, and C. VA also determined that the railroad adjacent to the western border of the proposed acquisition parcel is eligible for the NRHP under Criteria A and C. These two sites are the only historic properties identified within the APE. VA requests your review of and concurrence with these determinations of eligibility.

As part of the undertaking, VA proposes to demolish the Waldo House, which is a historic property. VA proposes avoidance and preservation in place for the associated Waldo family cemetery, which is not a historic property. VA has no plans for the railroad, which is a historic property, as the railroad is outside the proposed acquisition parcel.

VA finds that the proposed undertaking would not adversely affect the adjacent railroad as it is outside the area of proposed acquisition and will not be disturbed by cemetery activities. However, VA finds that the undertaking will result in an **adverse effect**, pursuant to 36 CFR 800.5(d)(2), due to demolition of the Waldo House. VA requests your review of and concurrence with this finding. VA plans to resolve the adverse effect through development of mitigation in a Memorandum of Agreement.

VA is concurrently consulting with the State Historic Preservation Office, federally recognized Indian tribes, representatives of local government, and other consulting parties regarding the proposed undertaking.

Should you have any questions or comments about this project, please contact Angela McArdle, VA Federal Preservation Officer, at Angela.McArdle@va.gov.

Sincerely,

WILLIAM
HOOVER

Digitally signed by
WILLIAM HOOKER
Date: 2026.03.03
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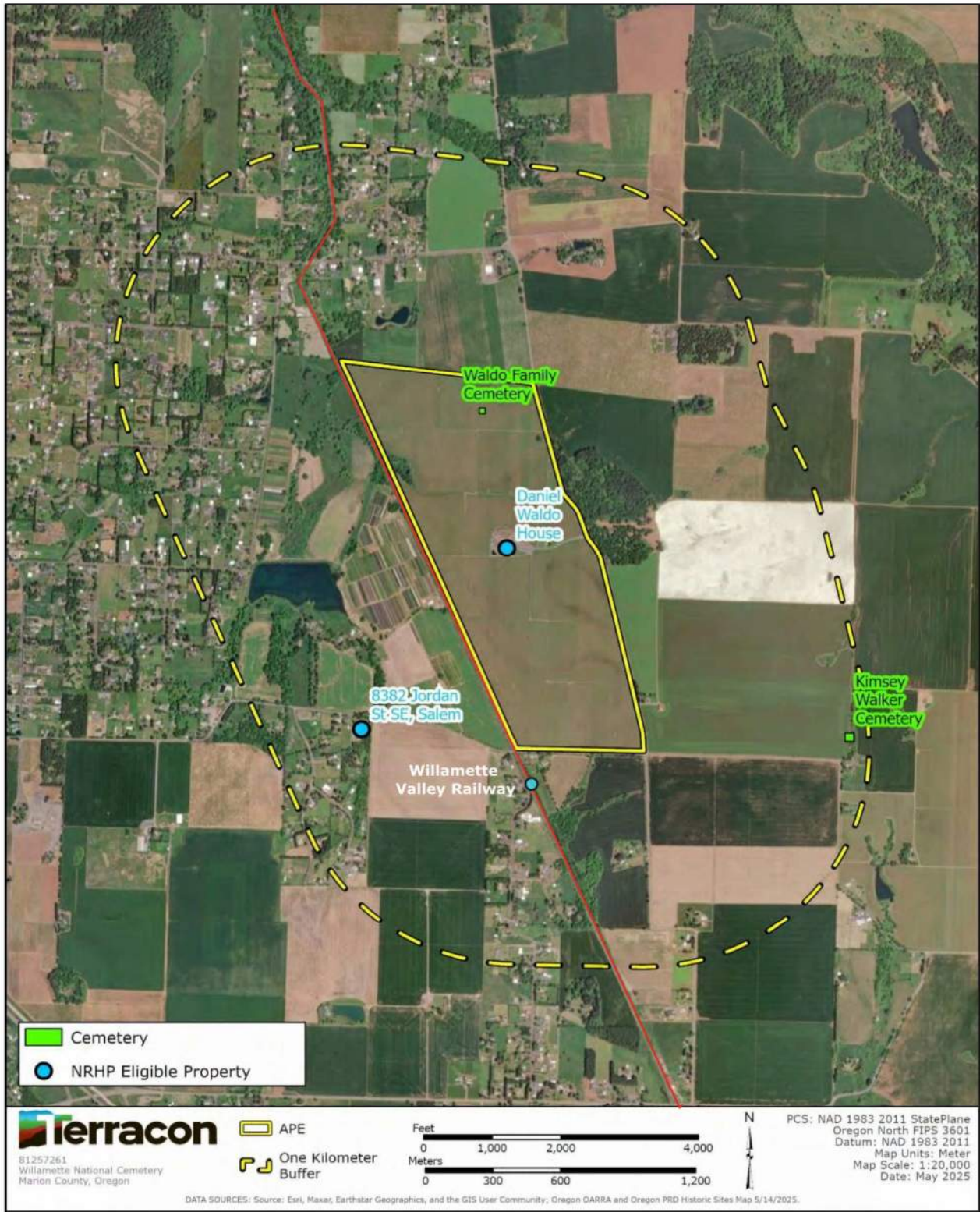
W. Edward Hooker, III (Ed)
Historic Architect and Cultural Resources Manager
National Cemetery Administration
Department of Veterans Affairs

Attachment 1: Area of Potential Effects Map

Attachment 2: Cultural Resources Preliminary Report: LRS Federal VA Willamette National Cemetery Land Acquisition Salem, Marion County, Oregon

Attachment 3: Phase I Archaeological Survey Report: LRS Federal VA Willamette National Cemetery Land Acquisition Salem, Marion County, Oregon

Attachment 1: Area of Potential Effects Map



Area of Potential Effects Map



IFs do not meet the criteria for the definition of a site and therefore are not considered under NRHP criteria. Therefore, no further work is recommended.

6.2 TS01

TS01 was initially identified during the background review by the OHSD as the Daniel Waldo House, which also corresponded with HPOI-05. It was subsequently confirmed during the reconnaissance of the proposed acquisition parcel on May 7, 2025, and during the archaeological survey. TS01 is situated on a low terrace overlooking a channelized drainage along its northern boundary. This site is currently occupied by residents of an attached structure (Figures 50 to 52). A paved road and gravel road mark the southern and western boundaries, and negative shovel tests within the existing vineyard mark the eastern and northern boundaries. The site consists of two two-story structures and a subsurface artifact scatter. One structure, the Daniel Waldo House, was subject to a historic resources survey in 2013 and was determined eligible for listing in the NRHP under Criteria A, B, and C for its Federal Revival architectural style, with elements of the Classical Revival, and for its association with the Waldo family (OHSD 2025a). The structure measures approximately 46 feet north/south with nearly identical red brick chimneys at either end, and approximately 19 feet across east/west. The house was constructed in 1854 with milled lumber with an articulated eave supported by a concrete slab foundation (Carter 2022).

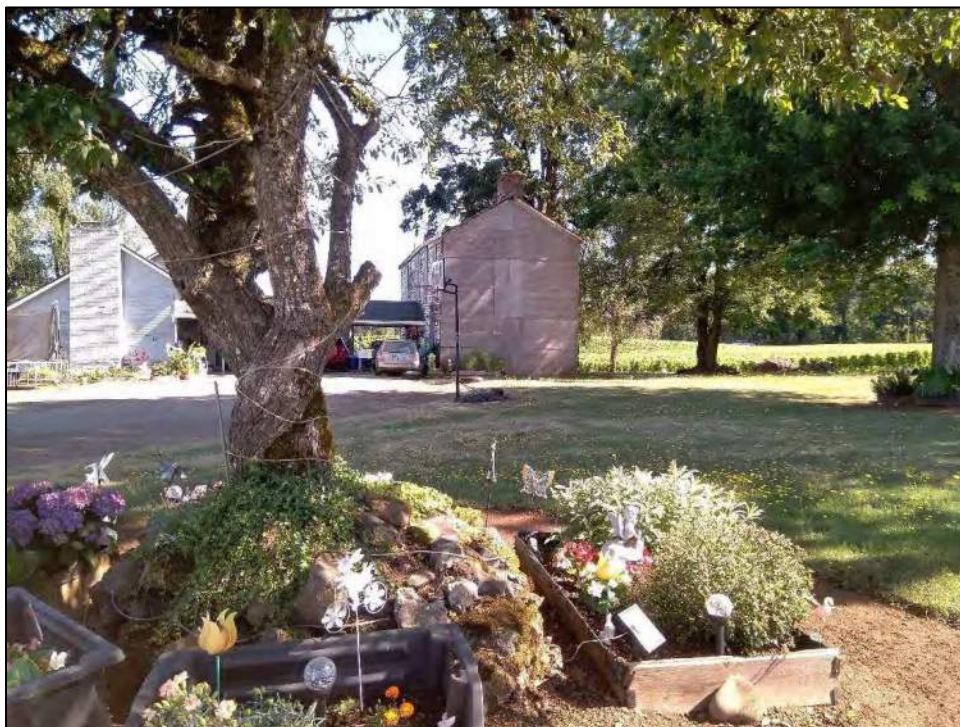


Figure 50. Overview of TS01 from shovel test IP989, facing north.



Figure 51. View of the Daniel Waldo House, facing west from entrance façade.



Figure 52. Overview of TS01, facing south from shovel test IP1016.

The second structure is approximately 30 feet west of the Daniel Waldo House, attached by an overhead awning (Figure 53). Records indicate a two-story structure was built by 1901 for water storage (Carter 2022; Marion County Assessor’s Office 2025). Later, it was converted to living space. Aerial imagery indicates the structure was present since 1955, and topographic maps represent it by 1971 (NETR 2025; USGS 2025b). The structure appears to be composite, consisting of a multi-story component at the northern end, and a single-story house with a brick chimney at the southern extent. The structure is supported by a brick foundation. The house that makes up the southern component has a raised deck extending out along the western façade with a wooden staircase (Figure 54).



Figure 53. Overview of TS01 with the Daniel Waldo House and adjoining structure.



Figure 54. Overview of TS01, facing south from shovel test IP1016.



Daniel Waldo House, circa 1950

<https://www.salemhistory.net/digital/collection/max/id/1019/>



Daniel Waldo House, circa 1947

<https://www.salemhistory.net/digital/collection/max/id/1020/>



6.3 TS02

TS02 is the railroad identified from topographic maps and aerial imagery during the initial background review. The railroad was subsequently confirmed during the reconnaissance of the proposed acquisition parcel on May 7, 2025, and during the archaeological survey. TS02 extends along the western border of the proposed acquisition parcel for approximately 1.2 miles on gently undulating terrain that makes up an eastern terrace overlooking an unnamed tributary to the Little Pudding River (Figure 62).

The railroad is a single-track raised on a basalt gravel berm (Figure 63). The berm measured approximately 10-foot and nine-inch wide and varied in height. Its elevation ranged from level with the ground surface to approximately three feet above grade. In some areas, the berm was cut through the gently rolling terrain. The tracks were placed approximately 56 inches apart or approximately 4-foot and 8.5-inch wide, which is the standard gauge for rail tracks (Siddall 1969). The tracks are standard Tee rails with a profile consisting of a base width of approximately 5.5 inches, head width of 3.125 inches, and approximately 6.25 inches in height (Figure 64). This profile could reflect a 100 or 115 pound per yard rail type (Hay 1991). The tracks had wooden ties in its extent along the southern portion of the proposed acquisition parcel, but closer to the northern border, some of the wooden ties were replaced with metal (Figure 65). Artifacts observed along the tracks included railroad equipment such as spikes, detached bolts and fasteners, and one aqua green glass shard (Figures 66 and 67).

The railroad is no longer in use. Some wooden ties were deteriorating, missing, or no longer aligned correctly. Corrugated steel culverts were observed along the tracks. A sign was observed along the tracks that was marked with an "X." Bioturbation caused by animal burrows was observed between ties, and vegetation was growing between the rails. Modern refuse was present but infrequent. Some rail equipment such as spare ties, plates, and spikes were piled adjacent to the track in several locations. There were no junctions or switches (see Figure 62).

This segment of the railroad was chartered in 1878 as a short line connecting Woodburn, north of the current proposed acquisition parcel, to its terminus in the town of Stayton, through Silverton, Mt. Angel, and a spur to the west that connected Greer in eastern Salem. Traffic along this line included lumber, plywood among other forest products, grain, fertilizer, food products, and sand. The railway was later acquired by Southern Pacific in 1890 (Union Pacific 2025). Records indicate the railway supported three locomotives that were built between 1955 and 1959, then rebuilt between 1973 and 1978 (Lewis 1996). The line continued to transport lumber and agricultural products (Bengyel et al. 1988). This line was leased from Southern Pacific in 1993 and became the Willamette Valley Railway. The spur to the west to Greer was discontinued in 1995 (Trainweb 2025). Traffic along the railroad south of Silverton was discontinued in 2012 due to weather damage in the vicinity of Macleay, but the line continues to operate between Woodburn and Silverton (Railroadfan 2025).



Figure 62. Delineation of TS02.



Figure 63. Overview of TS02, facing northwest from its intersection with Jordan Road SE at the southwestern extent of the proposed acquisition parcel.



Figure 64. Profile of railroad tracks.



Figure 65. Overview of metal and wooden ties.



Figure 66. Railroad spike.



Figure 67. Aqua green glass shard observed along railroad.

It has been noted that railroads across the Willamette Valley and central Oregon have been integral to the history of Oregon residents and have helped support vast economic growth (Engeman 2014; Tonsfeldt and Claeysens 2014). Indeed, the local community near the current proposed acquisition parcel declared that they relied heavily on the Willamette Valley Railway to support their lumber and agricultural industries (Bengyel et al. 1988). Other rails in Marion County have been noted for their significance and have been determined to be eligible for listing in the NRHP. A 2018 report recorded the BPA Chemewa Substation Railroad in Keizer, near the current proposed acquisition parcel, that was constructed in 1954. While portions of the spur were removed by 1984, the recorders recommended that the rails retain their overall integrity of location, design, materials, workmanship, feeling, and association as part of the substation despite the alteration of the surrounding setting (OHSD 2025b). Another railroad that was determined to be eligible is the Valley & Siletz railroad in Polk County. This line helped establish the lumber industry in Polk County, while also supporting improved transportation and shipping for the local farming communities and growing townsites (OHSD 2025c).

In accordance with the Guidance for Recording and Evaluating Linear Cultural Resources (SHPO 2013), the NRHP eligibility for TS02 was carefully considered under Criteria A and C. This portion of the Willamette Valley Railway may represent a significant contribution to broad patterns of local history as it served as a commercial line for the Willamette Valley, so it could be potentially eligible under Criterion A. While there are signs of deterioration, the overall structural integrity of the tracks and their components indicate that TS01 could be potentially eligible under Criterion C. The site is not associated with significant individuals,