



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

FEB 27 2019

IN REPLY REFER TO:

DETERMINATION OF ELIGIBILITY NOTIFICATION

**National Register of Historic Places
National Park Service**

Name of Property: Prado Dam Bicentennial Mural

Location: City of Corona, Riverside County

State: CA

Request submitted by: Eduardo T. De Mesa, Chief, Planning Division
USCOE Los Angeles District

Date received: 11/13/2018 Additional information received: 11/13/2018

Opinion of the State Historic Preservation Officer:

☐ Eligible ☐ Not Eligible ☒ No Response

See SHPO Polanco letter, July 13, 2018

Comments:

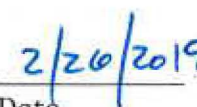
The Secretary of the Interior has determined that this property is:

☐ Eligible ☒ Not Eligible ☐ Need More Information

Comment:

See attached return comments.


Joy Beasley, Keeper of the National Register of Historic Places
Associate Director, Cultural Resources, Partnerships, and Science


Date

Prado Dam Bicentennial Mural
City of Corona, Riverside County, CA – DOE FP100003286

The National Park Service has determined that the Prado Dam Bicentennial Mural is not eligible for listing in the National Register of Historic Places. This determination was based primarily on the mural's loss of physical integrity. In our view the mural is no longer able to convey its historic character or its potential significance as an exceptional representation of local Bicentennial activity.

Evaluation Background

The Prado Dam Mural was completed in 1976 as a Bicentennial-themed activity undertaken by a local high school group. Painted onto the spillway apron of the Corps of Engineer's federally managed Prado Dam and readily visible from passing highway traffic, the mural was a prominent visual representation of the myriad of commemorative activities associated with the celebration of the American Bicentennial.

The U.S. Army Corps of Engineers (Corps) provided extensive documentation regarding the National Register eligibility of the mural. The Corps' evaluation cited several factors in reaching their conclusion that the property was not eligible for listing in the National Register, including the fact that the mural was a commemorative property, which did not meet National Register Criteria Consideration F, the mural was a property less than 50 years old that did not meet National Register Criteria Consideration G, and that the mural had been altered and had loss integrity sufficient to merit listing. The Corps also noted their opinion that the Bicentennial did not make a significant contribution to the broad patterns of our history and was therefore not a significant event meriting consideration.

The California State Historic Preservation Officer declined to provide a definitive evaluation on the National Register eligibility of the Prado Dam mural and instead recommended that the Corps seek a formal determination of eligibility directly from the Keeper.

Keeper's Evaluation

Our office carefully reviewed the documentation provided by the Corps along with information provided directly to our office by the Friends of the Prado Dam Mural. In reaching our determination, we differed in several key aspects with the evaluation made by the Corps. Specifically, we found the Corps' argument regarding Criteria Consideration F and commemorative properties to be flawed.

Commemorative properties that seek to attain significance from the historic past event being honored are generally not eligible for listing in the National Register. (A Civil War monument built in 1910 cannot be significant for its association with the war, or the soldier being honored.) A commemorative property can be eligible for

listing, however, when its significance rests in the events and efforts undertaken at the time of its completion. That is, when the act of commemoration is in itself a significant undertaking reflecting the views, actions, or perspectives of a contemporary community at a particular time in history. (The same Civil War monument might be eligible for listing as a reflection of the contemporary views and perspectives of the community that built it regarding important aspects of their past.) In the same way, Bicentennial efforts might be significant not for their association with the activities of 1776, but from the actions taken in 1976 to mark the 200th anniversary. A property erected as a monument to an important historical event will qualify if through the passage of time the property itself has come to symbolize the value placed upon the event and is widely recognized as a reminder of enduring principles or contributions valued by the generation that erected the property. In addressing Criteria Consideration F, the Prado Dam Mural could be found to meet the conditions necessary for listings.

We also disagree with the Corps' conclusion that the Bicentennial was not a significant event. While scholarly discussion and evaluation of the 1976 Bicentennial is not voluminous, we feel sufficient documentation is available to mark the event and the activities surrounding the celebration as significantly contributing to the broad patterns of American history. Such properties might perhaps meet National Register Criterion A given sufficient documentation and comparative evaluation. Dr. Lyn Spillman's letter of June 22, 2018, included in the documentation submitted, provides particularly convincing evidence of the significance of the Bicentennial from a scholarly perspective.

What is lacking is a strong comparative context for the physical resources that may still be extant to reflect the Bicentennial activities. Several sources cite the 66,000 "registered" events undertaken by communities to celebrate the Bicentennial, but little is known regarding the nature of these events and to what degree physical artifacts were a significant component of those activities. Establishing the exceptional significance of any one particular artifact or built resource, even within the local context, is therefore made exceedingly difficult. National Register Criteria Consideration G for properties less than fifty years old, requires such an assessment to determine which of those properties associated with the Bicentennial may be considered merely common manifestations of the activities of the period and which constituted exceptionally significant actions. Rarity alone and longevity are not necessarily automatic signifiers of exceptional significance, but they can be suggestive of the relative importance of certain properties. The Prado Dam Bicentennial Mural upon additional contextual analysis could in our view have potentially proven that it meets the Criteria Consideration threshold.

Final Evaluation

The National Register of Historic Places requires that properties not only meet one or more of the National Register Criteria for evaluation, but also retain sufficient historic integrity to adequately convey their significance. In our view the Prado Dam mural, in its current condition, does not retain sufficient integrity. The

unfortunate contemporary graffiti and over painting has obscured significant character defining elements of the overall 1976 design. Integrity of design, craftsmanship, feeling and association have all been dramatically impacted. Murals, as a distinctive property type, generally have a limited number of character-defining components—background/surface strata, paint material, and design/graphics/artwork. As a Bicentennial artifact the design/graphics could perhaps be seen as the most essential component. The message of celebration and historic commemoration was imbued in the original design, wording and content. While integrity of location and setting (background/surface strata) remain intact, the historic design and message is difficult to discern in the mural's current form. The *TOPS* graphic dominates the current design, significantly obscuring not only the physical artwork but also the intended historic message. While such overpainting might be acceptable for a house, where many other physical features may overcome the loss of one aspect, for the mural the message is at the core of the property's commemorative significance. National Register evaluations require that we consider the property in its current condition, not as it could be restored or recreated. The current massive overpainting, the loss of original paint through normal wear, and the addition of other non-historic graffiti have served to severely alter the mural's original design and commemorative intent, particularly as seen from a distance as was the original design intent. As an artifact of the Bicentennial, the cumulative effect of these changes has significantly impaired the property's ability to convey its historic character and significance.

Based on the properties lack of integrity, the mural is not eligible for listing in the National Register of Historic Places.

If you have any questions regarding these comments please contact National Register Historian Paul Lusignan at Paul.Lusignan@nps.gov 202-354-2229



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, U.S. ARMY CORPS OF ENGINEERS
915 WILSHIRE BOULEVARD, SUITE 930
LOS ANGELES, CALIFORNIA 90017-3849

November 6, 2018

Planning Division

Mr. Paul Lusignan
National Park Service
National Register of Historic Places
1849 C Street, NW (2280)
Washington, DC 20240

Dear Mr. Lusignan:

The U.S. Army Corps of Engineers, Los Angeles District (Corps), is seeking a formal determination from your office regarding the eligibility of a Bicentennial-themed mural painted on the Prado Dam spillway in the City of Corona, Riverside County, California, pursuant to 36 C.F.R. § 800.4(c)(2) and 36 C.F.R. Part 63. The Corps made a determination that the mural does not meet any of the National Register of Historic Places (National Register) eligibility criteria and therefore is not eligible for listing on the National Register. This determination was transmitted to the California State Historic Preservation Officer (SHPO) on June 1, 2018. The SHPO responded with a letter on July 13, 2018, and did not take a position on the determination, but instead responded that the documentation "raises substantial questions regarding the significance of the Bicentennial celebrations and associated works, and the application of Criterion Consideration F and Criterion Consideration G" (SHPO letter July 13, 2018, Appendix C5 of the Enclosure). The SHPO also cited concerns over the "historic integrity of the Prado Dam mural itself as it relates to eligibility." For these reasons, the SHPO requested that the Corps engage the Keeper of the National Register and seek a determination of eligibility from the Secretary of the Interior. This letter requests your determination of eligibility regarding the Bicentennial-themed mural described in the enclosed documentation. Additional details on the Corps' determination and consultation effort are provided below.

Background

The mural is painted on the spillway of the Prado Dam located in the City of Corona, approximately 0.25 miles north of the 91 freeway. Prado Dam is owned by the Federal Government and is a separable element of the Santa Ana River Mainstem (SARM) Project, a large multiphase flood risk management project along the Santa Ana River. A Programmatic Agreement for the entire SARM Project was executed in 1993 (see Appendix D of the Enclosure). One phase of the SARM Project includes raising the height of the Prado Dam spillway. In preparation for raising the height of the spillway, the Corps planned to completely remove lead-based paint and other coatings from the spillway. Part of this effort would involve the removal of the Bicentennial-themed mural painted by Corona High School students in 1976. The Prado Dam complex, including the spillway, had previously been determined eligible for listing on the National Register in 1991 and, pursuant to the Programmatic Agreement, mitigation for impacts to Prado Dam from implementation of the SARM Project was completed in 1996 with the preparation of Historic American Engineering Record (HAER) documentation. Although the mural was recorded as part of the spillway, it was not specifically called out as a contributing feature of the spillway or dam complex. In October of 2015, the Advisory Council on Historic Preservation (ACHP) recommended that the Corps separately assess the eligibility of the mural for listing on the National

Register due to new information, clear public support, and the passage of time since the last relevant survey of historic properties, pursuant to 36 C.F.R. § 800.4(c)(1). Based on this recommendation, the Corps is separately evaluating the mural for eligibility for listing on the National Register.

As part of the evaluation efforts and in accordance with 36 C.F.R. § 800.3(f), the Corps invited the following organizations, local governments, and individuals to participate in the National Historic Preservation Act Section 106 process as consulting parties: Friends of the Prado Dam Mural, Mural Conservancy of Los Angeles, the Bicentennial Freedom Mural Conservancy, Mr. Ron Kammeyer (original mural designer), Mr. Perry Schaefer (original mural designer), Ms. Cathy Sciortino (Corona resident who requested consulting party status), the City of Norco, the City of Chino Hills, the City of Corona, the City of Chino, the County of Riverside Flood Control and Water Conservation District, the County of San Bernardino, and Orange County Public Works. All of the parties, with the exception of Orange County Public Works, accepted the invitation to be a consulting party.

The Corps hosted a workshop with the consulting parties on May 11, 2016. The purpose of this workshop was for the Corps and the consulting parties to collaboratively apply the National Register criteria to the mural (Workshop transcript provided in Appendix C1 of the enclosure). The results of this workshop were used in the development of a historic context statement entitled, *The Prado Dam Mural: Evaluation of National Register Eligibility* (Appendix A of the enclosure). The historic context statement includes a thematic discussion of the U.S. Bicentennial and a comparison of artistic endeavors completed in celebration of the Bicentennial, as well as a comparison of other large-scale folk art. The Corps has also recorded the mural on the appropriate California Department of Parks and Recreation site form. (Appendix B of the enclosure).

As part of the Corps' good faith effort to consider the views of those entities who place value on the mural, on June 5, 2017, the Corps provided draft versions of the cultural resources report, entitled *The Recordation and Evaluation of the Prado Dam Bicentennial Mural, Corona, California*, and the abovementioned site form and historic context statement to the 12 consulting parties and the SHPO with a copy to the ACHP. The Corps also provided for review a preliminary determination that the mural did not meet the National Register criteria. The results of the preliminary assessment were also provided to the public via the Corps' website. The consulting parties and public were provided a 30 day comment period. In addition, any comments on the draft documents that were received between the dissemination of the draft report and the transmittal of the final determination of eligibility to the SHPO were also reviewed and considered in the updated analysis.

The Corps received a total of 219 comments regarding the draft determination of eligibility of the mural after June 5, 2017. There was no limit on the number of times an individual or group could provide a comment, and some provided multiple comments. Despite this large response, only five of the comments focused on the Corps' analysis regarding the eligibility of the mural. Instead, the focus of the majority of the comments echoed the sentiments submitted to the Corps prior to the dissemination of the draft determination and urged the Corps to "save", "restore", or "repaint" the mural. Comments specifically tied to the Corps' evaluation process include comments by the SHPO; the Mural Conservancy of Los Angeles (MCLA); the Corona Historic Preservation Society; the Friends of the Prado Mural; and Ms. Jennifer Mermilliod, an architectural historian who is under contract to mural co-designer Mr. Ron Kammeyer and has the endorsement of the Friends of the Prado Dam Mural. Copies of these five comments and all other comments received by the Corps after the dissemination of the draft documentation are included in the consultation record (Appendix C:4 of the enclosure). The cultural resource report (enclosure) contains a summary of the comments and the Corps' responses.

In response to these comments on the draft documentation, the Corps expanded the analysis in the historic context statement and updated the cultural resource report and site form. The Corps reevaluated

the mural in light of the comments, but this additional analysis did not change the Corps' determination that the mural does not meet the criteria for listing on the National Register. In accordance with 36 C.F.R. § 800.4(c), the Corps provided this final determination and supporting documents to the SHPO via letter dated June 1, 2018, and sent copies of the same consultation materials to the 12 twelve consulting parties. As noted above, the SHPO responded that their office had "spent a great deal of time in careful review of the evaluation, consulting party comments, and research to locate other similar historic resource [sic] whose information may help inform a determination. Collectively the documentation provided raises substantial questions regarding the significance of the Bicentennial celebrations and associated works, and the application of Criterion Consideration F and Criterion Consideration G." The SHPO also stated that their office "was concerned about the historic integrity of the Prado Dam mural itself as it relates to eligibility" (SHPO letter July 13, 2018, Appendix C5 of the enclosure). The SHPO recommended the most prudent course of action would be for the Corps to engage the Keeper of the National Register and seek a determination of eligibility.

As is evident from the comments and historic context statement, the key issues to the eligibility determination is whether the Bicentennial-themed mural should be evaluated as a commemorative property or instead whether the Bicentennial meets the National Register definition of a significant event. Furthermore, if the Bicentennial is a significant event was the mural's association with the Bicentennial both important and does the mural retain enough integrity to communicate that association.

Description of Resource

The mural measures approximately 630 feet long by 100 feet tall and covers almost the entire spillway. The original design featured the words "200 YEARS OF FREEDOM" in red paint followed by a blue image of the Liberty Bell and then "1776-1976" in red and white stripes at the bottom of the numbers and a blue background with white stars at the top, emulating the American flag. The paint has faded and someone has painted over the 1776. The mural now reads, "200 YEARS OF FREEDOM TOPS 1976." Weathering and peeling paint is also a major factor in the current appearance of the mural. The white base is almost entirely chipped off from the right side of the mural but has preserved better on the left side under the words "200 YEARS OF FREEDOM." This is probably owing to additional coats of paint in this section that were applied to cover previous alterations to the mural in 1991 when the mural was changed to read "200 YEARS OF GREED."

The 42-year-old mural was the brain child of a group of Corona High School students. Inspired by the Bicentennial celebrations around the country, the students petitioned the Corps to allow them to paint a Bicentennial design on the face of the spillway. The Corps, who manages the dam primarily for flood risk management purposes, agreed. A competition was held at the high school with Mr. Ron Kammeyer and Mr. Perry Schaefer eventually winning the contest. Mr. Kammeyer stated that he and Mr. Schaefer wanted a simple design which could be easily seen and "taken in" by the passing cars. They settled on the Liberty Bell as a fitting symbol for the founding of the United States along with the words "200 YEARS OF FREEDOM" (Kammeyer personal communication 2016). According to the Friends of the Prado Dam Mural, the mural was completed over two weekends with 25 to 30 students volunteering their time to paint the mural. Per the Friends of the Prado Dam Mural, the design was chalked in and painted by rollers and brushes, and a local hardware store donated the paint.

Synopsis of Eligibility Arguments

Because of the mural's type and age, the Corps evaluated the mural in reference to two specific National Register criteria considerations: *Criterion Consideration F* for properties that are commemorative in nature but exceptionally significant under other National Register criteria, and *Criterion Consideration G*, which recognizes properties that have not yet achieved fifty years of age, but

have achieved exceptional importance. Even if the mural's age, tradition, or symbolic value has invested it with its own exceptional significance beyond commemoration of the U.S. Bicentennial (Criterion Consideration F), that significance would need to be exceptional due to the property's age of approximately 42 years (Criteria Consideration G). The Corps also examined the Bicentennial as its own historic theme and evaluated the role of the mural within the Bicentennial celebrations.

Consideration of the Mural as a Commemorative Property (Criterion Consideration F)

Commemorative properties honor a person, place, or event in history and achieve memorial status as the years pass. They often serve as landmarks for the purpose of invoking sentimental activities or remembrances that may not otherwise occur, or for which there is no other tangible inspiration. However important such persons or milestones may be, historic monuments cannot be listed in the National Register for their association with the individuals or events for which they were created. These properties may, however, be found eligible for listing under a separate context unrelated to the figures they commemorate, or to the inscriptions they bear. For example, apart from the hallowed event or revered person depicted, a statue or piece of public art may embody the style of an important artistic movement or cultural tradition. In this example, the style and execution of the art piece, not the subject matter or event it memorializes, are what qualify it as eligible for the National Register. There can be no doubt that the Prado mural is associated with the nation's 200-year anniversary of its founding; however, its commemorative aspect presumptively disqualifies it from eligibility. Because it is a commemorative property, the mural cannot be eligible unless it derives significance from aspects other than from the Bicentennial it proclaims. As shown in the historic context statement (Appendix A of the Enclosure) and summarized in the criteria discussion below, the Corps found that the mural is not distinguished within the historical record of late twentieth century artwork and does not have significant associations apart from the Bicentennial and has concluded that it is not eligible for listing.

Consideration of the Mural as Property that has Achieved Significance within the Last 50 Years (Criterion Consideration G)

Properties that have achieved significance within the past 50 years may be eligible for listing on the National Register if they are of "exceptional importance" or if they are integral parts of a National Register eligible district. Exceptional importance is not defined in the regulations as it is an intentionally subjective concept but it includes properties that are directly associated with extraordinarily important events in our local or national history as well as a category of resources that are so fragile that survivors of any age are unusual and therefore require consideration under the National Register criteria.

Due to the mural's age, the Corps evaluated the mural in terms of whether it meets the test of "exceptional importance." The consulting parties put forth the idea that the mural is a fragile and short-lived resource due to the relative rarity of Bicentennial-themed public artworks and therefore the mural should be viewed as exceptional. Furthermore, they argue that the rarity of comparable properties justifies accepting a greater degree of alteration or fewer essential features in assessing the mural's integrity. The National Register guidelines qualify the discussion of fragile and short-lived resources by stating that "properties that by their nature *can* [emphasis added] last more than fifty years cannot be considered exceptionally important because of the fragility of the class of resources" (National Register Bulletin 15:42). Public art displays, as a category of resources, are not particularly fragile or short-lived and by their nature can last more than 50 years. While spontaneous Bicentennial artwork has, on the whole, not been preserved, other relics of the Bicentennial such as parks, trails, and public centers were created to last into the future. Additionally, a resource's categorization as a fragile or short-lived resource does not automatically bestow it with exceptional importance. Instead, the recognition of the short-lived nature of the resource encourages the evaluation of the resource prior to the traditional 50-year mark and, as stated by the consulting parties, allows for a lower threshold for integrity. "All properties, regardless

of age, must be demonstrated to meet the Criteria for Evaluation.” (National Register Bulletin 15:43) As seen below, the Corps has evaluated the mural in terms of whether the mural is exceptionally important under any of the four National Register criteria.

Criterion A

Some of the consulting parties have argued that the mural is not a commemorative property because it celebrates the Bicentennial itself and that the Bicentennial was a significant event in our nation’s history. The difficulty with establishing the Bicentennial as its own significant event is that its “significance” is derived from the significance of the event it is commemorating, the founding of the United States. The public comments echo this reality. Very few of the comments draw an association with 1976 or the Bicentennial, and instead memorialize familial or nostalgic connections unrelated to the event itself. Most comments suggest the mural has become a rallying point for the collective nostalgia that comes with societal change, especially in a region of California where growth and development have distorted or erased familiar touchstones.

National Register eligibility also demands evidence of exceptional importance for properties less than 50 years of age, such as the mural. While seeming arbitrary at times, the 50-year threshold was established to ensure sufficient passage of time to allow for adequate perspective. National Register Bulletin 22 points out that the case for exceptional importance is bolstered when there is a substantial amount of professional, documented materials—not social commentary—on the resource or resource type. While there are hundreds of thousands of newspaper articles chronicling the activities of the Bicentennial and even a handful of Bicentennial critiques, the literature tying the events of the Bicentennial to changes in cultural and civic institutions, social ordering, legislative development, or any other thematic subject is lacking. A search through the National Register and various Federal agencies’ gray literature revealed no other Bicentennial-themed resources being evaluated for the National Register. In contrast, the academic literature examining the earliest Cold War Era properties as they approached the 50-year threshold was prevalent.

Although spontaneous and publically sponsored Bicentennial works and remnant commemorations can be found nationwide and are valuable to the pride and honor of communities, none of these expressions themselves produced a recognizable shift or development of any significance (see historic context statement in Appendix A of the enclosure). Although the U.S. Bicentennial observance remains a special anniversary date, it does not meet National Register definitions as a significant event or broad pattern of history that measurably affected the nation.

Assuming, however, for purposes of a complete analysis, that the United States’ Bicentennial was a significant event in our nation’s history as defined in the eligibility guidance, then in order to meet the criteria for eligibility, the mural must have been important within the context of the Bicentennial. The mural’s mere association is not adequate qualification for eligibility. Under National Register Bulletin 15, “the property’s specific association must be considered important as well.” Among surviving formal and informal Bicentennial works—murals, paintings, objects, sculptures—eligibility could be achieved only through distinction or importance within the Bicentennial context. For example, a Bicentennial park might be significant because its layout and design influenced other park creation, or because it played a major role in initiating Bicentennial festivals throughout a region, but not solely for its Bicentennial theme. The prepared historic context statement demonstrated that the mural does not have impactful associations within the national or local Bicentennial context, and none that are exceptional. For these reasons, the Corps has found that the mural is not eligible under Criterion A, regardless of whether the mural is a commemorative property or not.

As a point of clarification, the architectural historian hired by the Friends of the Prado Dam Mural suggested in both of her comment letters that the opening of the nearby Prado Dam Park was linked to the painting of the mural as an unparalleled feat in the region. Based on this comment, the Corps has further evaluated the connection of the park and the mural. The Corps granted San Bernardino County a lease for recreational development on October 1, 1965, over a decade before the idea of the mural was conceived. The impetus for the creation of the Prado Dam Park was not the Bicentennial but instead the desire to increase recreational opportunities in the County. The Prado Dam Park, which did finally open in 1976, was not a planned Bicentennial event; rather, the County took advantage of the felicitous year of opening by capitalizing on the momentum of the Bicentennial spirit in its opening ceremony. The mural is not visible from the park, and the park and the mural's only association is that the development of each required permission from the Corps.

Criterion B

In regard to Criterion B, properties could be eligible if they are associated with the lives of significant persons in our past. Properties associated with living persons are typically not eligible for listing on the National Register because insufficient time has passed to evaluate the persons' larger contributions or bodies of work. The authors of the Prado mural design, Ron Kammeyer and Perry Schaefer, are living, therefore presumptively disqualifying the mural for associations with important artists/individuals. Furthermore, whether or not artists are living, a comparative analysis of their works would be needed in order to elevate the subject work as exceptional within their careers and productions. Although the authors of the Prado mural design, Mr. Ron Kammeyer and Mr. Perry Schaefer, may be locally recognized as talented individuals, the mural is not identified with a significant artistic career of exceptional merit, nor does it exude particular qualities of a body of work. Thus, the Corps has found that the mural is not eligible under Criterion B.

Criterion C

The Corps has also evaluated the mural under Criterion C, under which properties could be eligible if they embody the distinctive characteristics of a type, period, or method of construction that represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction. It has been demonstrated that murals may be eligible for the National Register if they are found to be significant works of a recognized artist or because they represent a distinctive artistic style, type, or expression associated with a group of people. However, the graphics used in the Prado mural—letters, numbers, Liberty Bell—are not unique or sufficiently distinguished to convey exceptional artistic merit. The bell motif, for example, was rendered with ordinary styling and cannot be attributed to a particular artistic movement or to the work of a master artist. The letters and numbers, likewise, do not evoke associations with a particular artistic type, or with a recognized Bicentennial mode or style. Therefore, the Corps has found that the mural is not eligible under Criterion C.

Criterion D

Eligibility under Criterion D relies on two factors: whether "the property has or had information to contribute to our understanding of human history or prehistory," and, secondly, whether that information is "considered important" (National Register Bulletin 15). The mural does not have the ability to answer questions regarding specialized painting methods or engineering designs. Further research of the mural does not have the ability to generate any additional information about life in the United States in the 1970s or the founding of the United States, or to provide as of yet unknown information about mural planning and execution. The Corps has found that the mural is not eligible under Criterion D.

Integrity

The burden of integrity for National Register eligibility requires that a property retain the essential physical features that enable it to convey its historic importance. Those essential features are those features that clearly communicate why the resource is eligible and are tied to the resource's period of significance, in this case 1976. Furthermore, "properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction" (National Register Bulletin 15:46). Of the original 1976 design, the first part of the message "200 YEARS OF FREEDOM" is not original but was repainted in the 1990s. The application of "TOPS" has almost entirely obscured the liberty bell and "1776." Of the seven aspects of integrity, the mural's original design, materials, and workmanship have been compromised. The Corps has determined that the mural lacks the integrity needed to be eligible for the National Register.

Summary

The Corps has included on the enclosed disk the following materials for your review: A cultural resource report entitled, *The Recordation and Evaluation of the Prado Dam Bicentennial Mural, Corona, California*, and its associated site form; the historic context statement entitled, *The Prado Dam Mural: Evaluation of National Register Eligibility*, prepared by the U.S. Army Corps of Engineers' Technical Center of Expertise for the Preservation of Historic Structures and Buildings; a transcript of the consulting parties workshop held on May 11, 2016; copies of correspondence related to the eligibility determination, including prior correspondence between the Corps, SHPO, and ACHP, and comments received on the Corps' draft and final determinations; the Programmatic Agreement for the Santa Ana River Mainstem Project; and an excerpt of the HAER documentation. Hard copies of the cultural resource report, historic context statement, site form, and the most pertinent comments received on the Corps' draft and final determinations have been printed out and enclosed for your convenience.

At this time the Corps is requesting that you review the enclosed documentation and, pursuant to 36 C.F.R. § 63.2, notify the Corps within forty-five (45) days of receipt of this letter with your determination of the mural's eligibility.

A copy of this letter is also being sent to Ms. Julianne Polanco, State Historic Preservation Officer (SHPO), Mr. Christopher Daniel, Program Analyst (ACHP), and the 12 consulting parties mentioned above. Please direct any comments or concerns to Ms. Danielle Storey, Archaeologist, at Danielle.L.Storey@usace.army.mil, via phone at (213) 452-3855, or you may mail your response to Ms. Storey at the address listed on the letterhead.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eduardo T. De Mesa', with a long horizontal line extending to the right.

Eduardo T. De Mesa
Chief, Planning Division

Enclosure