

**CRM TECH**

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MEMORANDUM

Date: June 4, 2025
From: Bai “Tom” Tang, Principal, CRM TECH
To: Quang Nguyen, Capital Projects Principal Engineer, Public Works Department, City of Moreno Valley, and Stephen O’Neil, Cultural Resources Manager, UltraSystems Environmental, Inc.
Subject: Preliminary Historic Significance Evaluation and CEQA-Compliance Analysis: Former Hendrick Ranch Headquarters Building at 27913 Cottonwood Avenue (Assessor’s Parcel No. 488-200-013), Moreno Valley, CA 92555

Dear Mr. Nguyen and Mr. O’Neil:

The memorandum presents a summary of our team’s current understanding of the potential historic significance of the former Hendrick Ranch headquarters building at 27913 Cottonwood Avenue (Figure 1) and the implications in future treatment of the building to comply with cultural resources provisions of the California Environmental Quality Act (CEQA). Please be advised that the statements in this memorandum represent preliminary opinions of our team based on existing City records pertaining to the building, other readily available “desk-top” sources, and a field visit. As you know, a comprehensive study on this issue would require much more extensive and in-depth research to establish the historical background of the building and the Hendrick Ranch. However, in the process of due-diligence information gathering to formulate the scope of work for such a study, our team came to the realization that sufficient data exist to suggest that the building would most likely meet CEQA definition of a “historical resource” and thus would require proper protection, as outlined in the sections below.

Qualifications of Hendrick Ranch as a “Historical Resource”

According to PRC §5020.1(j), “‘historical resource’ includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.” More specifically, CEQA guidelines state that the term “historical resources” applies to any properties listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). In other words, buildings, structures, sites, or districts that belong to one or more of the following three categories are to be considered “historical resources” for the purposes of CEQA compliance, as clarified in past court cases (e.g., 160 Cal. App. 4th 1051):

- Mandatory historical resources: properties that are listed in or formally determined to be eligible for listing in the California Register of Historical Resources;
- Presumptive historical resources: properties that are designated in an officially established local register, recognized by local ordinance, resolution, or general plan, or identified in a local survey

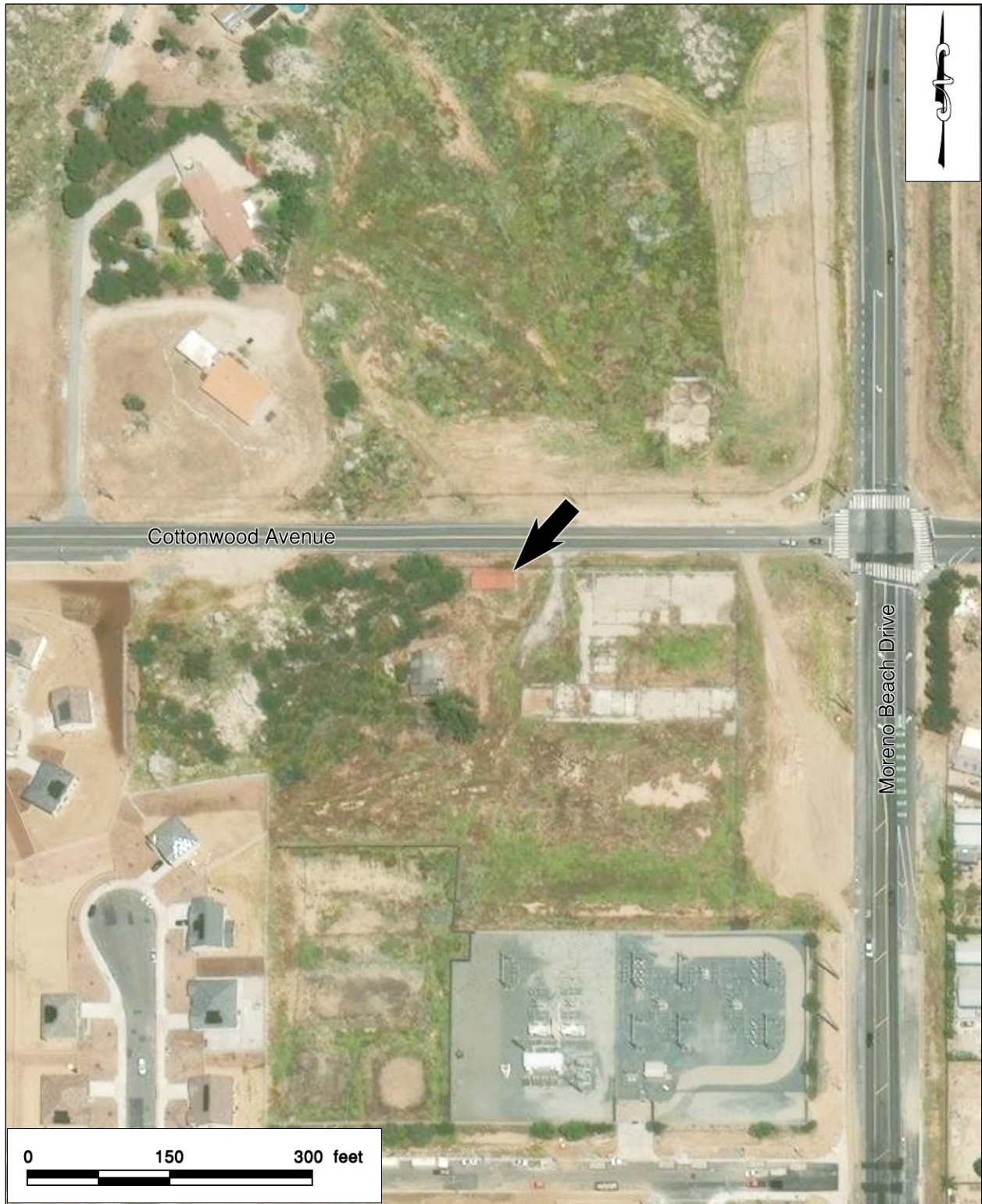


Figure 1. Location of the building in the former Hendrick Ranch headquarters complex.



Figure 2. The former Hendrick Ranch headquarters building with accompanying adobe walls on either side, view to the northwest.

prepared in accordance with PRC §5024.1(g), unless determined not to be historically or culturally significant by the lead agency upon a preponderance of the evidence;

- Discretionary historical resources: properties that are determined to be historically significant in the lead agency’s discretion, independent of any decision to list or designate them in a national, state, or local register of historical resources.

The building in question, a one-story concrete block structure (Figure 2) that was reportedly “moved there in 1937 and used as ranch headquarters/office,” is now one of the two surviving buildings at the former Hendrick Ranch headquarters complex on the southwestern corner of Cottonwood Avenue and Moreno Beach Drive, the other being the 1885 farmhouse, the oldest building in the City of Moreno Valley (Lucas 2011). In the early 20th century, the Hendrick Ranch encompassed almost 23,000 acres (approximately 36 square miles) in total area, on which much of the present-day urban core of Moreno Valley was later developed, as were two major military installations in the area, the 1918 March Field (now March Air Reserve Base) and the WWII-era Camp Haan (*ibid.*; MVHS 2024; City Moreno Valley n.d.).

The ranch was founded in the 1880s by Eli Emery Hendrick (1832-1909), “a millionaire from Pennsylvania, who launched an aggressive plan to turn Moreno Valley into the home of the world’s largest orange grove” (Lucas 2011; Hagley n.d.). Like many other prominent “gentlemen farmers” in the southern California citrus belt at the time, Hendrick was a successful entrepreneur “back east”

and is remembered today as an inventor and the founder of the Hendrick Manufacturing Company, the leading provider of perforated and custom-fabricated metal products in North America today (Hagley n.d.; Hendrick n.d.). The life and career of Eli Hendrick, thus, add another angle to the historical interest in the Hendrick Ranch.

Given the indubitable importance of the Hendrick Ranch in the development of what is now Moreno Valley, in September 2011 the City's Environmental and Historical Preservation Board designated it a local historic landmark pursuant to Title 7 of the Municipal Code (EHPB 2011). In the resolution proclaiming the designation, the Board further notes that a previous cultural resources study completed in 2006 found the 1885 farmhouse to meet criteria for local, state, and national historic significance (*ibid.*), presumably referring to the criteria for City designation as well as those for listing in the California Register of Historical Resources and the National Register of Historic Places. In any event, as an officially designated local historic landmark, the Hendrick Ranch headquarters complex as a whole clearly meets CEQA definition of a "historical resource" in the category of "presumptive historical resources."

Former HQ Building as a Contributor to Hendrick Ranch

The remaining question regarding the significance evaluation of the former headquarters building in the complex is whether it represents a major contributor to the overall historic value of the landmark. As mentioned above, this building was a relatively late addition to the complex. The presence of the building at this location has been dated to 1937 (Lucas 2011), half a century after the beginning of Eli Hendrick's citrus-growth "empire" and nearly 30 years after his death. According to CEQA guidelines, if the significance of the Hendrick Ranch stems mainly from the early years of its history, this building would fall outside the period of significance and consequently would not be considered a primary contributor.

However, since the Hendrick Ranch evidently remained an important agribusiness in the Moreno Valley area through the mid-20th century and until urban growth during the final decades of the century eventually spelled the end of its prominence, it is safe to presume that the period of significance for Hendrick Ranch would include several decades after the arrival of this building. Being home to the administrative office of the ranch, the building was undoubtedly an important part of the history of the ranch during that period. Moreover, the Environmental and Historical Preservation Board's landmark proclamation specifically states that the designation applies to "all structures, walls, and trees" on that portion of the 8.75-acre parcel (EHPB 2011), including a 1940s warehouse that has since been demolished (Lucas 2011). The building in question, therefore, is very likely to qualify as a "historical resource" under CEQA provisions as a contributing component of the landmark unless a comprehensive study on its history and significance produces a preponderance of the evidence suggesting otherwise.

CEQA Compliance Considerations

CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be

impaired.” Since the former headquarters building of the Hendrick Ranch is likely to meet the definition of a “historical resource,” the demolition, destruction, or relocation of the building or substantial alterations to its current condition and appearance would likely constitute “a substantial adverse change in the significance of a historical resource” and, thereby, “a significant effect on the environment.”

It is our understanding that there is currently no project being proposed that may impact this building, but the City is exploring the possibility of relocating it to a different portion of the Hendrick Ranch headquarters complex in preparation for future widening of the adjacent segment of Cottonwood Avenue. While the relocation of the building would technically meet the definition of “a substantial adverse change in the significance of a historical resource” in PRC §5020.1(q), guidelines adopted by the State of California Office of Historic Preservation provide the following exception: The relocation of a building would not preclude its continued eligibility as a “historical resource” if the building retains other aspects of integrity, such as design, materials, workmanship, feeling, and association, and “is part of a complex but is of less significance than the remaining (unmoved) buildings” (NPS 1997:29). In our opinion, this exception would almost certainly apply to the building in question since it is accompanied in the Hendrick Ranch headquarters complex by the 1885 farmhouse.

Based on these considerations, we recommend to the City of Moreno Valley two alternatives for the future treatment of the former Hendrick Ranch headquarters building: preservation, or mitigation. If either of these alternatives is adopted by the City, future projects involving the building would be able to avoid “a substantial adverse change” in the significance of this “historical resource” or reduce the effect to a level less than significant.

Preservation Alternative: The building be preserved at its current location or at a new location within the Hendrick Ranch headquarters complex.

As with any “historical resources,” the best approach to protect the historic value of the building is on-site preservation, especially when pertinent guidelines make it possible to relocate the building on the property without substantially compromising its significance, as discussed above. To ensure the proper preservation of the building, maintenance work will be required to provide adequate security and prevent further deterioration. Regarding these activities as well as possible future repair, rehabilitation, reuse, and/or restoration, it is recommended that all necessary work be carried out in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Codified in 36 CFR Part 67.7(b), these standards are listed below:

- (1) A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- (2) The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- (3) Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
- (4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

- (5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
- (6) Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
- (7) Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- (8) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
- (9) New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- (10) New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Pursuant to §15331 of CEQA Guideline Article 19, projects seeking to preserve, maintain, repair, stabilize, rehabilitate, restore, or reconstruct “historical resources” in a manner consistent with the Secretary of the Interior’s Standards are afforded categorical exemption from further CEQA review under Class 31.

Mitigation Alternative: Proper mitigation measures be implemented on the building if demolition or significant alteration becomes inevitable.

A typical mitigation measure that is often applied on significant buildings that cannot be preserved is a detailed recordation program to preserve the historical and architectural data about the building instead. In light of the local focus of the building’s significance, recordation procedures comparable to Level II or III of the Historic American Buildings Survey (HABS) would be an appropriate approach in this case. The completed recordation should include the following components:

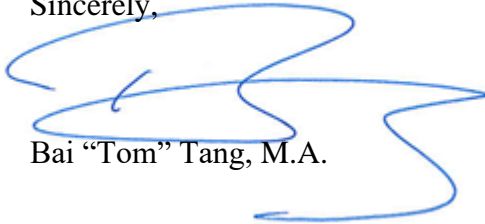
- Systematic photo-records of the building’s structural and architectural characteristics, including overviews from all sides, elevation shots, as well as exterior and interior details;
- Textual documentation of the history, architectural characteristics, and current condition of the building;
- As-built plans, if available, and scaled drawings of the current floor plan.

Upon completion of the recordation efforts and approval by the City of Moreno Valley, the resulting collection of textual and graphic records on the building should be curated at the local repository of the California Historical Resources Information System, currently the South Coastal Information Center at San Diego State University, as well as the City of Moreno Valley Community Development Department (Planning Division), and the Moreno Valley City Library for easy public access. These procedures, in conjunction with any other measures deemed necessary through further

research and analysis, would typically serve as adequate mitigation for the demolition, alteration, or relocation of historic buildings of a similar level of significance.

Thank you for this opportunity to be of service. If you have any questions regarding the contents of this memorandum or need any further information, please do not hesitate to contact our team at (909) 824-6400 or ttang@crmtech.us.

Sincerely,



Bai "Tom" Tang, M.A.

References Cited:

City of Moreno Valley

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NPS (National Park Service, U.S. Department of the Interior)

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