

Communication from Public

Name:

Date Submitted: 02/23/2026 12:16 AM

Council File No: 25-1518

Comments for Public Posting: The Sunkist Precedent: A Blueprint for the Barry Building - The Argument for Adaptive Reuse

February 22, 2026

This is being provided to the Los Angeles City Council, Planning and Land Use Management (PLUM) Committee PRIOR to the 02-24-2026 PLUM Meeting

RE: Council File No. 25-1518, Barry Building LA #887, The Sunkist Precedent: A Blueprint for the Barry Building - The Argument for Adaptive Reuse

The core of our position is that Historic-Cultural Monument (HCM) status is not a barrier to development—it is a framework for it. The recent completion of Citrus Commons at the former Sunkist Headquarters in the San Fernando Valley proves that the City of Los Angeles has the tools, the precedent, and the successful "live-work-play" model to save the Barry Building.

The Sunkist Model (Success Defined)

At the Sunkist site, the City and the developer (IMT Residential) achieved what many claimed was impossible:

- **Preservation of the Icon:** The 1970 Brutalist "inverted pyramid" by A.C. Martin & Associates was fully rehabilitated into 126,000 square feet of creative office space.
- **Strategic Infill:** Instead of demolishing the landmark, the developer "wrapped" the site with two new mid-rise buildings, adding 249 units of much-needed housing and a ground-floor Trader Joe's.
- **The Outcome:** The historic building provides the soul and character of the project, while the new construction provides the density and economic viability. This is a win for preservation, a win for housing, and a win for the tax base.

The Barry Building Application

The Barry Building (HCM #887) is a prime candidate for this exact same strategy. Like the Sunkist building, it features a unique architectural silhouette and a central courtyard that is perfectly suited for modern "indoor-outdoor" commercial or residential use.

- **Compatibility:** The Barry Building's low-slung, "California thin-line" profile allows for creative infill or vertical additions that respect the original footprint while adding residential density to the San Vicente corridor.
- **The "Double Standard":** If the Planning Department and the PLUM Committee deemed the Sunkist building worthy of this sophisticated adaptive reuse approach, to deny the Barry Building the same opportunity is an inconsistent application of City policy.

Why Adaptive Reuse Trumps Demolition

The current owners of the Barry Building argue that the site is "obsolete." The Sunkist project proves that obsolescence is a choice made by the owner, not a fact of the architecture. * Environmental Responsibility: Adaptive reuse is the "greenest" form of construction. Stripping the Barry Building to its concrete and steel bones for a creative office or boutique residential conversion saves thousands of tons of debris from landfills—an argument that aligns with the City's own sustainability goals.

- **Legal Consistency:** By utilizing the **California Historical Building Code (CHBC)**, the City can grant the Barry Building the same flexibilities afforded to the Sunkist project regarding parking, seismic upgrades, and accessibility.

The "Citrus" Solution

The City cannot claim that the Barry Building is un-developable while standing in the shadow of the Sunkist success story. We are not asking for the site to remain a frozen-in-time museum piece. We are asking the PLUM Committee to demand the same level of architectural creativity and civic responsibility that was applied to the Sunkist Headquarters.

If the "inverted pyramid" can be the centerpiece of a luxury residential hub in Sherman Oaks, the Barry Building can—and must—be the centerpiece of a revitalized Brentwood.

Communication from Public

Name:

Date Submitted: 02/23/2026 12:21 AM

Council File No: 25-1518

Comments for Public Posting: Council File No. 25-1518, Barry Building LA #887, The Sunkist Precedent: A Blueprint for the Barry Building - The Argument for Adaptive Reuse, Includes LA Times Article

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BUSINESS

Thousands of apartments set to take over empty office buildings with new L.A. ordinance



The former office headquarters of Sunkist — a well-known San Fernando Valley landmark — will be converted into housing under the terms of a newly adopted adaptive reuse ordinance by the city of Los Angeles. (Myung J. Chun / Los Angeles Times)

**By Roger Vincent**

Staff Writer | Follow

Feb. 11, 2026 3 AM PT

- Los Angeles loosened conversion rules, allowing commercial buildings just 15 years old to become housing with streamlined

city approvals instead of lengthy reviews.

- The ordinance could unlock thousands of apartments across L.A., addressing both the housing shortage and the city's vast vacant office space problem.
- Developers still face obstacles, including higher construction costs, the city's Measure ULA tax, and declining rental prices.

Los Angeles officials just made it easier to convert empty commercial buildings to housing, opening the door to the creation of thousands of apartments across a city clamoring for housing.

Developer Garrett Lee already is rolling.

After years of struggling to find white-collar tenants for a gleaming office high-rise on the edge of downtown, he has just begun converting its office space into close to 700 apartments.

With the new Citywide Adaptive Reuse Ordinance going into effect this month, many more housing conversions are coming to Los Angeles, Lee said.

"This is monumental for the city," he concluded.

The ordinance opens the possibility of conversion for many more buildings than the 1999 guidelines, which paved the way for converting older downtown buildings and jump-started a residential renaissance that turned downtown into a viable neighborhood after decades as a commercial district where few wanted to live.



BUSINESS

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A second act for empty office space? How skyscrapers in downtown L.A. could ease the housing crisis

Aug. 11, 2025

The first ordinance applied to buildings erected before 1975 and was focused primarily on downtown. Under the new guidelines, commercial buildings that are merely 15 years old throughout Los Angeles can be converted to housing with city staff approval, rather than going through lengthy review processes that may reach the City Council.

Streamlining conversion approvals for projects that meet city guidelines will remove one of the biggest hurdles for developers who historically had to guess how long it would take to start construction, Lee said.

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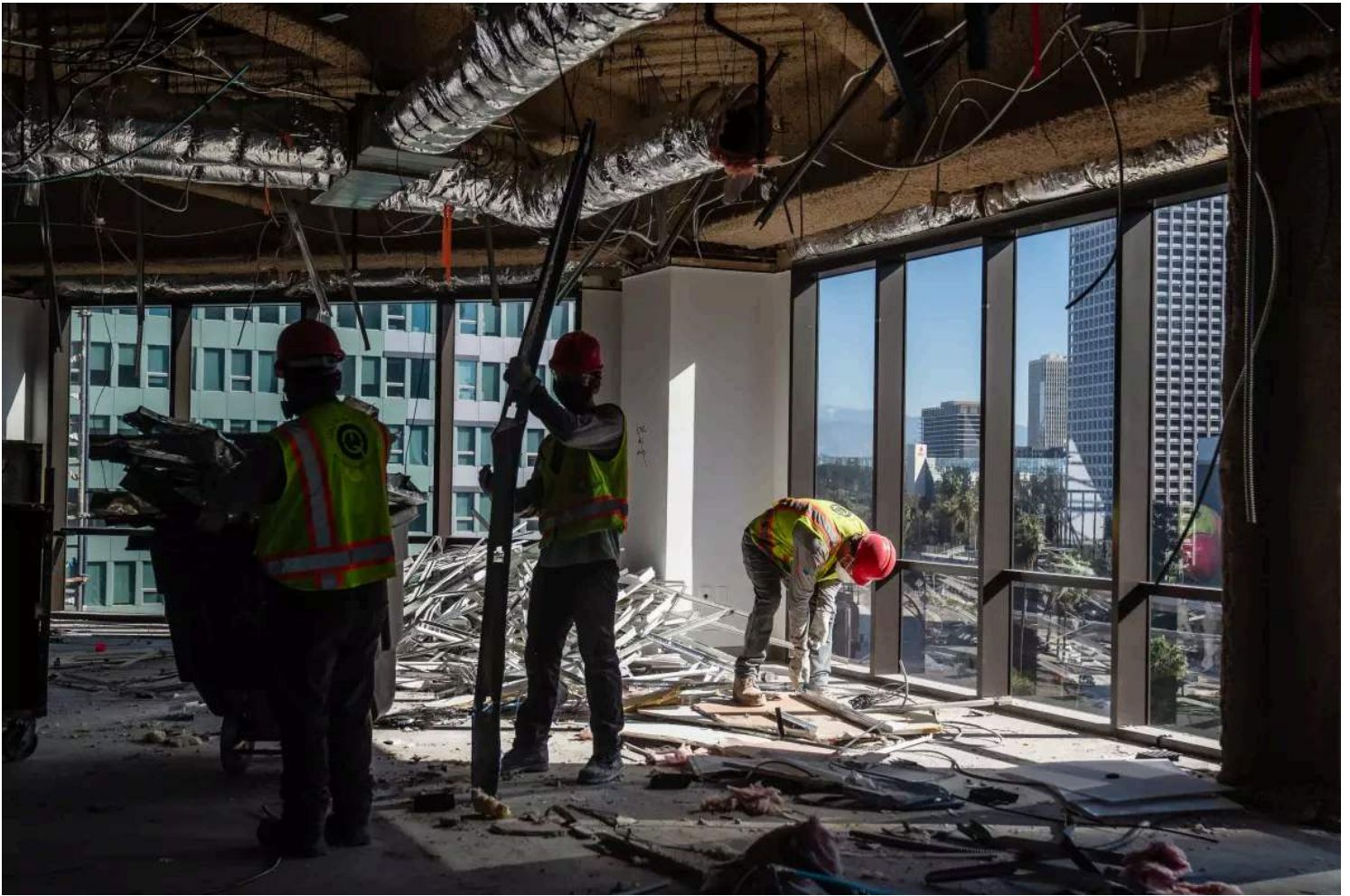
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San Diego shows what happens when a city actually lets builders build

Jan. 20, 2026

“When you take that risk off the table, it materially improves the feasibility of conversions,” said Lee, president of Jamison Properties.

“It addresses both the housing shortage and the long-term office vacancy issue,” he said.



Contractors from Wilshire Construction work on an 1980s office skyscraper being developed by Jamison Properties just west of the Harbor Freeway on 7th Street on Friday in Los Angeles. (Ariana Drehsler / For The Times)

There are more than 50 million square feet of empty office space in Los Angeles, according to industry experts, spread among the city's many commercial districts and corridors such as Wilshire Boulevard.

The new ordinance inspired developer David Tedesco to move ahead with plans to convert a high-profile office building in Sherman Oaks, a neighborhood that wasn't previously included in the city's adaptive reuse guidelines.

His company, IMT Residential, plans to turn the former headquarters of Sunkist Growers into 95 apartments.

The eye-catching inverted pyramid designed in brutalist style is visible from the 101 Freeway and served as Sunkist's headquarters from 1970 to 2013. The Los Angeles

Conservancy called the building “[a symphony in concrete](#),” worthy of city landmark status.

Earlier, there were plans to renovate the building for new offices, but as demand for office space plunged after the pandemic, Tedesco says his company decided to use the new adaptive reuse ordinance to make it into residences.

The new rules mean “we could move forward a lot faster” and avoid a potentially lengthy environmental impact review, he said.



BUSINESS**Downtown L.A.'s struggle is overstated and fixable, says the mogul who built the Grand**Dec. 24, 2025

The 1999 ordinance proved that people wanted to live downtown and that converting old office buildings to housing or hotels could transform a neighborhood, said Ken Bernstein, a principal city planner in L.A.'s Planning Department.



People walk through the Union Bank Plaza in downtown Los Angeles in August. (Allen J. Schaben / Los Angeles Times)

Construction of new apartments followed the wave of conversions downtown in the early 2000s, and the ordinance was expanded to a few other neighborhoods with older buildings, including Hollywood and Koreatown.

But until this month, residential conversions in most of the city still required more approvals, permits and hearings as well as an environmental review, Bernstein said.

“That could be a very time-consuming, cumbersome and expensive process,” he said.

The new rules “unlock the potential” of thousands of underutilized structures all over the city, he said, including such commercial centers as Westwood, Olympic Boulevard, South Los Angeles, Ventura Boulevard and the Harbor District.



BUSINESS

\$2-billion mega-development in Skid Row clears major hurdle with L.A. officials

Oct. 15, 2025

The ordinance is not limited to office buildings. Industrial buildings, stores and even parking garages are eligible for conversion to housing.

Bernstein envisions shopping center owners converting part of their retail and garage space to housing under the new guidelines. Even smaller strip malls would qualify for conversion to housing.

While the new ordinance lowers hurdles for landlords interested in converting their underused buildings, they still face market and regulatory forces that bedevil all housing developers.



President of Jamison Properties, Garrett Lee, standing in a mock-up apartment in a 1980s office skyscraper just west of the Harbor Freeway on 7th Street on Friday. (Ariana Drehsler / For The Times)

Among them are interest rates that make construction loans more expensive. Higher tariffs have driven up the prices of construction materials and equipment, while the crackdown on undocumented workers has thinned and spooked much of the international workforce on which the housing industry depends.

Developers also say that Measure ULA, the city's "mansion tax" on large property sales, hurts the outlook for the profitability of any housing.

Measure ULA "is really impeding developers from doing any development in the city of Los Angeles," said local architect Karin Liljegren, who specializes in adaptive reuse projects and helped the city craft the new ordinance.



BUSINESS

FOR SUBSCRIBERS

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Oct. 1, 2025

Developers also worry that new apartments won't generate enough income to cover construction costs.

Apartment renters accustomed to steady price hikes [saw a downward shift last year](#) as the median rent in the L.A. metro area dropped to \$2,167 in December — the lowest price in four years, according to [data from Apartment List](#).

Experts disagree on the momentum behind the drop. Some say it's a sign of things to come, while others suggest it's merely a brief price plateau and rents will rise again this year.

Conversion activist Nella McOsker, president of the Central City Assn. business advocacy group, said the new ordinance is "tremendous" and creates "incredible

flexibility” for owners who want to make changes. But L.A. needs to follow the example of other cities and do more in the way of financial incentives for developers trying to make a project pencil out.

The Central City Assn. wants the city to consider financial incentives for conversions — even though it is experiencing budget shortfalls — to help bridge the gap to profitability, McOsker said, citing programs in other central business districts.



BUSINESS

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Dec. 11, 2025

New York, Washington and Boston have property tax abatement programs, for example. San Francisco offers transfer tax exemptions, and Chicago uses tax-increment financing to encourage some redevelopments. In Canada, Calgary offers direct grants.

In Washington and New York, there has been widespread adoption of adaptive reuse, Lee said, resulting in makeovers of buildings that each add 1,000 to 2,000 residential units.

Lee, who has converted nearly 2,000 apartments so far, said he plans to take advantage of terms in the new ordinance that will allow him to put more apartments on each floor.

“We’re taking projects that are fully designed already and we’re redesigning them for more, smaller units,” he said, which helps reduce rents.

The new rolling 15-year age requirement also will bring up a new crop of conversion candidates every year. More recently built structures need fewer upgrades and may not require seismic retrofits to meet safety codes.

“Vintage matters,” Lee said. “Converting a building from 1990 versus one from 2010 is night and day due to the differences in code eras.”

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Roger Vincent

Roger Vincent covers commercial real estate for the Los Angeles Times.