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October 3, 2025

Honorable City Council, Commissioners, and Staff:

The Downtown Austin Neighborhood Association (DANA) opposes height limits and other exclusionary zoning downtown, and we specifically oppose the base height limit proposed in the [C20-2025-010 Central Business District \(CBD\) amendments](#).

We recognize that the proposed CBD base height limit is an attempt to restore the incentive to participate in the Downtown Density Bonus Program (DDBP), given that SB 840 removed the floor area ratio (FAR) limits on which the program depends. As we noted in a [March 2024 letter](#), density bonus programs rely on exclusionary zoning to "work" and produce less housing relative to granting the same entitlements by right.

Indeed, a [2024 Turner Center and UCLA study](#) of Los Angeles' Transit Oriented Communities (TOC) program found that removing the affordability requirements, and granting the "bonus" entitlements by right, would produce 38% more housing over a decade. The report confirmed that calibration is futile; housing production suffers dramatically no matter how lenient the affordability requirements (short of eliminating them entirely).

We thus reiterate our [March 2024 proposal](#) to replace the DDBP with a mechanism that (1) captures the extra property tax revenue resulting from having no FAR caps or height limits and (2) dedicates a portion of it to affordable housing and other community benefits. This alternative will produce more housing overall, and provide a larger and steadier funding stream for these community benefits, than would downzoning the CBD to restore the incentive to participate in the DDBP.

Sincerely,

Board of Directors
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