



American Planning Association
Texas Chapter

Creating Great Communities for All

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HOUSE BILL 3135

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Thank you, Chairman Burns, for the opportunity to present information related to House Bill 3135 and for your work on behalf of the Great State of Texas. My name is **Carissa Cox**, and I am here to testify on behalf of the American Planning Association - Texas Chapter (APA Texas) in **opposition to House Bill 3135**. APA Texas is an association of over 2,500 private and public sector planners that manage growth and plan for development in Texas.

Conducting a cost-benefit analysis requires a technical level of expertise and knowledge that will require consultants to perform this service. This unfunded mandate would require all towns, no matter their size, staffing capacity, budget, development pressure or economic conditions, to have consultants on constant retainers or to hire unnecessary staff. Most general law towns don't have their own city engineer because of the cost and limited degree of regulation they already undertake. The financial burden HB 3135 would place on small towns in Texas will negatively impact not only the economic condition of the town but the individual business owners and workers, teachers, and other middle-income earners.

Many cities delay beneficial updates to their codes because of cost. Adding the additional deterrent of this new complex analysis will send a message to communities that it's better (less expensive) to stick to their outdated zoning laws and subdivision codes because of the significant cost of updating them to current best practices and market relevant standards.

There is a huge disconnect between this bill and other bills being considered by the legislature this session. HB 3135 would require a full analysis before any city in Texas could implement a single change required to comply with laws passed by the State, many of which we support and have worked on with the bill sponsors and local communities.

APA Texas works closely with everyone involved in designing, regulating and developing projects all over our state. Land use and development are our core areas of expertise. Again—we would be happy to have some of our members with expertise in this area meet with you and your staff on these issues. I thank you for your time and would be happy to answer any questions you may have.

Respectfully submitted,

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Carissa Cox, AICP, American Planning Association - Texas Chapter