No. 21-0717

In the Supreme Court of Texas

TJFA, L.P., ENVIRONMENTAL PROTECTION IN THE INTEREST OF CALDWELL COUNTY, JAMES ABSHIER, AND BYRON FRIEDRICH,

Petitioner,

v.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AND 130 ENVIRONMENTAL PARK, LLC,

Respondents.

On Petition for Review from the
Third Court of Appeals, Austin
Case No. 09-19-00815-CV

BRIEF OF AMICUS CURIAE THE TEXAS PUBLIC POLICY FOUNDATION

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STATEMENT OF INTEREST[1]

The Texas Public Policy Foundation ("TPPF") is a nonprofit, nonpartisan research foundation dedicated to promoting and defending liberty, personal responsibility, and free enterprise throughout Texas and the nation. To advance these aims, TPPF provides academically sound research, policy recommendations, and advocacy. TPPF also fights government overreach through litigation, seeking to enforce constitutional limits on governmental authority.

One important limit on governmental authority is the separation of powers mandated by the United States Constitution and the Texas Constitution. TPPF has a strong interest in ensuring that legislatures are not permitted to abdicate their constitutionally assigned roles by delegating legislative powers to other branches or to unelected officials. This case implicates that interest because the court of appeals interpreted the Texas Health and Safety Act as giving an agency wide discretion in deciding whether local ordinances are valid. Accordingly, TPPF submits this amicus brief to highlight a potential separation-of-powers issue.

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[1] No fee was paid or will be paid for preparing this brief. *See* Tex. R. App. P. 11(c).

INTRODUCTION AND SUMMARY OF THE ARGUMENT

This dispute implicates separation-of-powers concerns and provides the Court with an opportunity to clarify the role that these principles play in statutory interpretation.

In this case, a county enacted an ordinance prohibiting the building of a solid waste facility at a particular site within the county. But an administrative agency, the Texas Commission on Environmental Quality ("TCEQ"), refused to give effect to that local ordinance and instead granted a landfill permit for the prohibited location. Under Texas Health and Safety Code § 363.112(c) and § 364.012(e), the authority of counties and cities to prohibit a landfill in a location terminates once a landfill-permit application "has been filed with" and "is pending" before TCEQ. Interpreting this language in its statutory context, the court of appeals reasoned that "an application is 'filed with' and 'pending before' the Commission when the application is administratively complete and awaiting action by [TCEQ]." *TJFA, L.P. v. Tex. Comm'n on Envtl. Quality*, 632 S.W.3d 660, 670 (Tex. App.—Austin 2021, pet. filed). It then concluded that TCEQ could decide that the submission of a "partial application" qualified as an "administratively complete" and "pending"

application that cut off the county's authority to enact a landfill-siting ordinance. *Id.*

The court, however, overlooked a potential separation-of-powers issue: the Legislature cannot constitutionally delegate unconstrained authority to TCEQ to decide when to give effect to a local ordinance. To be constitutional under current precedent, the Texas Health and Safety Code must set forth reasonable standards to guide TCEQ's decisions. If the statute does not provide such standards, the constitutional problem with the delegation would be especially pronounced here as it would allow unelected agency officials to nullify the actions of elected county officials.

Although no party challenged the constitutionality of the relevant provisions, it is a well-established principle that, where possible, statutes should be construed in a constitutional manner. Therefore, if the Court grants review, it should consider whether the statute can be construed so that it imposes reasonable standards to guide TCEQ's decisions. By doing so, the Court would emphasize the importance of separation-of-powers principles and clarify how those principles can help a court ascertain the meaning of a statute.

ARGUMENT

I. The Court of Appeals' Interpretation of the Texas Health and Safety Act Implicates Separation-of-Powers Concerns.

The Texas Constitution vests the Legislature—not an executive agency like TCEQ—with the legislative power. This means the Legislature cannot delegate legislative power to agencies and unelected officials. Even under current precedent that may not fully enforce this important constitutional safeguard, a delegation is unconstitutional if the statute does not provide reasonably clear standards to guide an agency's decision or if the statute allows the agency to make fundamental policy decisions.

In this case, the court of appeals' interpretation of the Texas Health and Safety Code gives TCEQ broad discretion to decide when a city or county's authority to adopt a landfill-siting ordinance terminates. It authorizes TCEQ to decide that the submission of a partial application—two parts of a four-part application—qualifies as filing a complete, and thus pending, application that allows TCEQ to refuse to give effect to a local ordinance. But courts should interpret statutory provisions in light of constitutional separation-of-powers requirements. Therefore, if it is possible and consistent with the text, this Court should interpret the

Texas Health and Safety Code as imposing limits on TCEQ's discretion to decide whether to give effect to local ordinances.

A. The Texas Legislature Cannot Delegate its Legislative Power to Administrative Agencies.

The Legislature cannot abdicate its legislative role by delegating policy decisions to TCEQ and other administrative agencies. In contrast, it can task TCEQ and other agencies with implementing laws, including by delegating factfinding that can trigger a law's application.

Similar to the United States Constitution, the Texas Constitution separates governmental authority—the executive, judicial, and legislative powers—between three branches and vests legislative power in the Legislature. *See Tex. Boll Weevil Eradication Found. v. Lewellen*, 952 S.W.2d 454, 465 (Tex. 1997).[2] The Texas Constitution provides that

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[2] Due to the similarities between the Texas Constitution and U.S. Constitution, certain federal cases discussing separation-of-powers principles and the nondelegation doctrine can be persuasive. That is why this Court approvingly cited *A. L. A. Schechter Poultry Corp. v. United States*, 295 U.S. 495 (1935), in *Texas Boll Weevil Eradication Found.*, 952 S.W.2d at 465. But the Texas Constitution's prohibition on the delegation of legislative power appears more robust than the federal prohibition, *compare* U.S. Const. art. I, § 1, *with* Tex. Const. art. II, § 1, art. III, § 1, and this Court "should never feel compelled to parrot the federal judiciary," *Davenport v. Garcia*, 834 S.W.2d 4, 20 (Tex. 1992); *cf. Abbott v. Anti-Defamation League Austin, Sw., & Texoma Regions*, 610 S.W.3d 911, 927 n.4 (Tex. 2020) (Blacklock, J., concurring) ("The Texas Constitution thus has plenty to say about voting rights, and I see little reason to default to federal judicial standards when resolving voting-rights claims raised under the state constitution."). Moreover, Texas courts "have historically been more comfortable striking down state laws on th[e] basis [of an unconstitutional delegation] than their federal counterparts." *Tex. Boll*

the other branches cannot exercise the legislative power that belongs to the Legislature:

> The powers of the Government of the State of Texas shall be divided into three distinct departments, each of which shall be confided to a separate body of magistracy, to wit: those which are Legislative to one, those which are Executive to another, and those which are Judicial to another; and no person, or collection of persons, being of one of these departments, shall exercise any power properly attached to either of the others, except in the instances herein expressly permitted.

Tex. Const. art. II, § 1; *see* Tex. Const. art. III, § 1 ("The Legislative power of this State shall be vested in a Senate and House of Representatives, which together shall be styled "The Legislature of the State of Texas."). In sum, "the power to pass laws rests with the Legislature, and that power cannot be delegated to some commission or other tribunal." *Tex. Boll Weevil Eradication Found.*, 952 S.W.2d at 466 (quoting *Brown v. Humble Oil & Refining Co.*, 83 S.W.2d 935, 941 (Tex. 1935)); *see Chancey v. State*, 19 S.W. 706, 709 (Tex. 1892) ("Laws can be made in this State only by the Legislature, and it has no power to delegate to any board or

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Weevil Eradication Found., 952 S.W.2d at 468. This Court should therefore not feel constrained by federal separation-of-powers precedent to the extent it has "departed from the original meaning of the Constitution," *Dep't of Transp. v. Ass'n of Am. R.R.*, 575 U.S. 43, 69 (2015) (Thomas, J., concurring in judgment), and offers less protection for separation-of-powers principles than the Texas Constitution.

other department of the government the power to annul laws enacted by it."); *cf. Schechter Poultry*, 295 U.S. at 529 ("The Congress is not permitted to abdicate or to transfer to others the essential legislative functions with which it is thus vested."). [3]

This prohibition on the delegation of legislative power "ensures democratic accountability by preventing [the Legislature] from intentionally delegating its legislative powers to unelected officials." *Nat'l Fed'n of Indep. Bus. v. Dep't of Labor*, 142 S. Ct. 661, 669 (2022) (Gorsuch, J., concurring). This is important because, among other concerns, "[w]hen citizens cannot readily identify the source of legislation or regulation that affects their lives, Government officials can wield

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[3] As this Court has held, however, nondelegation principles do not prevent local governments from promulgating local regulations. *See Proctor v. Andrews*, 972 S.W.2d 729, 734 (Tex. 1998) ("The Legislature may delegate to municipalities that have not adopted home rule charters local legislative power adequate to execute the purposes for which they were created."); *Stanfield v. State*, 18 S.W. 577, 578 (Tex. 1892) ("Our constitution and statutes each provide for the adoption of laws in particular localities according to and dependent upon the expressed will of the people to be affected, and such statutes have not in every instance been expressly directed by the constitution."); *see also* Tex. Const. art. V, § 18 ("[T]he County Commissioners Court . . . shall exercise such powers and jurisdiction over all county business, as is conferred by this Constitution and the laws of the State, or as may be hereafter prescribed."); *Stoutenburgh v. Hennick*, 129 U.S. 141, 147 (1889) ("[W]hile the rule is . . . fundamental that the power to make laws cannot be delegated, the creation of municipalities exercising local self-government has never been held to trench upon that rule. Such legislation is not regarded as a transfer of general legislative power, but rather as the grant of the authority to prescribe local regulations, according to immemorial practice, subject of course to the interposition of the superior in cases of necessity.").

power without owning up to the consequences." *Ass'n of Am. R.R.*, 575 U.S. at 57 (Alito, J., concurring). Indeed, "[t]he principle that [Congress or the Texas Legislature] cannot delegate away its vested powers exists to protect liberty," and it is the constitutional design that restricts lawmaking to the legislative process with its "many accountability checkpoints." *Id.* at 61.

Nevertheless, some limited delegations are permissible under current precedent, such as the "delegation of power to enforce and apply law [which] is both necessary and proper." *Tex. Boll Weevil Eradication Found.*, 952 S.W.2d at 466 (citing *Field v. Clark*, 143 U.S. 649, 693–94 (1892)); *see Hous. Auth. of Dall. v. Higginbotham*, 143 S.W.2d 79, 87 (Tex. 1940) (listing circumstances where delegations were deemed acceptable). One example of a permissible delegation is "conditional legislation" where the legislative body creates a rule that turns on a triggering event and an executive body "makes the *factual* determination that causes that rule to go into effect." *Ass'n of Am. R.R.*, 575 U.S. at 78 (Thomas, J., concurring in judgment); *see Gundy v. United States*, 139 S. Ct. 2116, 2136 (2019) (Gorsuch, J., dissenting) ("[O]nce Congress prescribes the rule governing private conduct, it may make the application of that rule

depend on executive fact-finding."). In other words, agencies may make a factual determination that will trigger a law's application:

> The Legislature may validly delegate the authority to find facts from the basis of which there is determined the applicability of the law; that is, an administrative body may be given the authority to ascertain conditions upon which an existing law may operate (the authority given railroad commissions, public utility commissions, livestock and sanitary commissions, public health boards and fish and game commissions).

Higginbotham, 143 S.W.2d at 87.

Courts have also allowed legislatures to pass general provisions and delegate authority "to fill up the details." *Wayman v. Southard*, 23 U.S. (10 Wheat.) 1, 43 (1825).[4] Under this Court's precedent, the Legislature may authorize "administrative agencies to establish rules and regulations when the Legislature has provided reasonable standards to guide the agencies in carrying out a legislatively prescribed policy." *Proctor*, 972 S.W.2d at 734. The delegation "may not be accomplished by

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[4] At one point, the Texas Court of Criminal Appeals expressed reservations about such delegations. *See Ex parte Wilmoth*, 67 S.W.2d 289, 290 (Tex. Ct. Crim. App. 1934) (citing *Wayman* and expressing skepticism of the "relaxed interpretation" of the "against the general rule which declares that the power to make laws is a function of the law-making body and that such power cannot be delegated to others"), *but see Margolin v. State*, 205 S.W.2d 775, 778 (Tex. Ct. Crim. App. 1947) ("The generally accepted rule governing the delegation of legislative power is that a legislative body may, after declaring a policy and fixing a primary standard, delegate to an administrative tribunal or officer the power to fill up the details so as to carry out and effectuate the legislative purpose.").

language so broad and vague that persons of common intelligence must necessarily guess at its meaning and differ as to its application." *Tex. Antiquities Comm. v. Dallas Cnty. Cmty. Coll. Dist.*, 554 S.W.2d 924, 928 (Tex. 1977) (plurality op.) (quotation omitted).

If there are not reasonably clear standards, the delegation is an impermissible "abdication of the authority to set government policy which the Constitution assigns to the legislative department." *City of Pasadena v. Smith*, 292 S.W.3d 14, 18 (Tex. 2009); *see Bullock v. Calvert*, 480 S.W.2d 367, 372 (Tex. 1972) (refusing to interpret a statute delegating to "the Secretary of State the decision on whether or not state funds should be used for party primary elections and, if so, for what particular expenses and to what extent" as it "would be an unconstitutional delegation of legislative power").[5] Policy decisions thus cannot be delegated under the pretense of delegating gap-filling; instead, the Legislature must make—not delegate—policy decisions.

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[5] *See also Ass'n of Am. R.R.*, 575 U.S. at 86 (Thomas, J., concurring in judgment) (reasoning that "our mistake lies in assuming that *any* degree of policy judgment is permissible when it comes to establishing generally applicable rules governing private conduct" and that "the 'intelligible principle' test" should not be understood "as permitting Congress to delegate policy judgment"); *Indus. Union Dep't, AFL-CIO v. API*, 448 U.S. 607, 687 (1980) (Rehnquist, J., concurring); ("fundamental policy decisions" cannot be delegated to administrative agencies).

B. To the Extent Possible, the Texas Health and Safety Code Should Be Construed to Avoid an Unconstitutional Delegation of Legislative Power.

Statutes should, when possible, be construed to avoid or minimize an unconstitutional delegation of legislative power. Yet the court of appeals interpreted the Texas Health and Safety Code provisions at issue as authorizing TCEQ to decide that a partial application is a complete and pending application that prevents a city or county from enacting a landfill-siting ordinance. This interpretation may exacerbate potential separation-of-powers issues with the Legislature's delegation of authority to TCEQ. If this Court grants review, it should consider whether the statutory provisions at issue can instead be read as imposing more limits on TCEQ's discretion.

It is well-established under Texas law that "[a] statute is presumptively constitutional." *Brooks v. Northglen Ass'n*, 141 S.W.3d 158, 169–70 (Tex. 2004). Courts "presume that when enacting legislation, the Legislature intends to comply with the state and federal constitutions," *Stockton v. Offenbach*, 336 S.W.3d 610, 618 (Tex. 2011); *accord* Tex. Gov't Code § 311.021(1). This means that courts are "obligated to avoid constitutional problems if possible," *Brooks*, 141

S.W.3d at 169, by adopting a statutory "construction consistent with constitutional requirements," *Proctor*, 972 S.W.2d at 735 (quotation omitted). And there are examples of this Court doing so, *see Rusk State Hosp. v. Black*, 392 S.W.3d 88, 95 (Tex. 2012); *In re C.J.C.*, 603 S.W.3d 804, 818–19 & n.75 (Tex. 2020), including to avoid unlawful delegations, *see City of Pasadena v. Smith*, 292 S.W.3d 14, 19 (Tex. 2009).[6] Accordingly, the Court should interpret the Texas Health and Safety Code to avoid or minimize an unlawful delegation of legislative power if possible.

Under the Texas Health and Safety Code, TCEQ generally lacks the authority to grant a landfill-permit application in "an area in which the processing or disposal of municipal or industrial solid waste is prohibited" by a county or municipal ordinance. Tex. Health & Safety Code §§ 363.112(d); 364.012(f). But TCEQ can grant a landfill-permit application notwithstanding a local ordinance if "an application for a

[6] *See also Aleman v. Tex. Med. Bd.*, 573 S.W.3d 796, 810 n.1 (Tex. 2019) (Blacklock, J., concurring) (noting that, if the agency's interpretation was accepted, the statute "could fail a constitutional challenge under non-delegation principles"); *cf. Nat'l Cable Television Ass'n v. United States*, 415 U.S. 336, 342 (1974) ("Whether the present Act meets the requirement of *Schechter* . . . is a question we do not reach. But the hurdles revealed in those decisions lead us to read the Act narrowly to avoid constitutional problems.").

permit" was "filed with" and "pending" before TCEQ when the county or city enacted its ordinance. *Id.* §§ 363.112(c), (d), 364.012(e), (f). The statute authorizes TCEQ to decide whether a landfill is prohibited by a local ordinance in determining whether to grant a landfill-permit application. *See id.* §§ 361.061, 363.112(d), 364.012(e).

The statute appears to provide at least some standards to guide TCEQ's determination: namely, that an application must be complete to be pending and to prevent a county from passing a valid landfill-siting ordinance. Section 361.066 requires an applicant to submit an "administratively complete application," otherwise "the application is considered withdrawn" (and thus, cannot be pending). *See* Tex. Health & Safety Code § 361.066(b). And the statute sets forth prerequisites for an "administratively complete" application. It provides that "[a] permit application is administratively complete when: (1) a complete permit application form," report, and fees have been submitted; and "(2) the permit application is ready for technical review." Tex. Health & Safety Code § 361.068(a).[7]

[7] In accordance with these provisions, the regulations require a complete landfill-permit application to be submitted—Parts I through IV—before an application is deemed "administratively complete." *See* 30 Tex. Admin. Code § 330.57(a).

Despite the statute's requirement that a landfill-permit application be complete to be pending, the court of appeals concluded that a partial application can be "administratively complete and awaiting action by [TCEQ]," and held that the submission of two parts of a four-part application preempted the county's authority to enact an ordinance in this case. *See TJFA, L.P.*, 632 S.W.3d at 670. It reached this conclusion based on § 361.069, which allows TCEQ, "in processing a permit application," to "make a separate determination on the question of land use compatibility" and "at another time consider other technical matters concerning the application." Tex. Health & Safety Code § 361.069.

But the court of appeals' interpretation is not compelled by § 361.069 and would increase TCEQ's discretion. First, § 361.069 is silent regarding whether it changes the prerequisites of an "administratively complete" application. Rather than altering what constitutes a complete and pending application, the plain text of § 361.069 simply authorizes TCEQ to consider a landfill-permit application in parts. It gives TCEQ the option to issue a separate land-use compatibility determination first and then, if TCEQ determines the application passes that first hurdle, move on to considering whether

"other technical matters" with the application are satisfactory. *Id.* Section 361.069 does not expressly allow an applicant to submit a landfill-permit application in piecemeal fashion. Second, § 361.069 leaves it entirely to TCEQ's "discretion" to bifurcate the decisionmaking process without any standards to guide that discretion. *Id.*

The court of appeals' interpretation thus arguably gives TCEQ discretion to make a policy decision—whether to preempt local government's authority to prohibit landfills in certain areas after a partial application or after a complete application—as opposed to simply delegating factfinding to TCEQ. This interpretation is problematic because the Legislature cannot constitutionally delegate policy decisions to agency officials. *See City of Pasadena*, 292 S.W.3d at 18; *Bullock*, 480 S.W.2d at 372; *Ass'n of Am. R.R.*, 575 U.S. at 86 (Thomas, J., concurring in judgment); *Indus. Union Dep't*, 448 U.S. at 687 (Rehnquist, J., concurring). Therefore, if the Court grants review, it should consider whether the relevant statutory provisions can instead be construed as providing some limits on TCEQ's discretion to minimize this potential separation-of-powers problem.

PRAYER

The Court should grant the petition for review and elaborate on the role of the nondelegation doctrine in construing statutes.

Dated: June 17, 2022

Respectfully submitted,

/s/Robert Henneke

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CERTIFICATE OF COMPLIANCE

I certify that this document complies with the word-count limitations in Rules 9.4(i)(2)(D) and 11(a) of the Texas Rules of Appellate Procedure because it contains 3,386 words, excluding the parts exempted by Rule 9.4(i)(1).

/s/Robert Henneke
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