



**Bobby M. Salehi**  
512.480.5638  
512.480.5838 (fax)  
bsalehi@gdhm.com

MAILING ADDRESS:  
P.O. Box 98  
Austin, TX 78767-9998

June 9, 2025

*Filed Electronically*

Laurie Gharis, Chief Clerk  
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
OFFICE OF THE CHIEF CLERK MC-105  
P.O. Box 13087  
Austin, Texas 78711-3087

RE: *Written Reply to TCEQ Response to Hearing Requests on Application by Coupland Utilities, LLC and Landcrowd Developers, LLC; TCEQ Permit Number WQ0016446001("Application"); TCEQ Docket Number 2025-0541-MWD*

Dear Chief Clerk Gharis:

This Reply to the Executive Director's ("ED") Response to Hearing Request on the above-referenced Application is made on behalf of Mrs. Juliet Van Zandt ("Mrs. Van Zandt"). Mrs. Van Zandt agrees with the ED's and Office of Public Interest Counsel's ("OPIC") recommendations that she be granted standing in this matter as an affected person per 30 Texas Administrative Code § 55.203.

Mrs. Van Zandt agrees that the ED's recommended issues # 1-9 be referred to the State Office of Administrative Hearings ("SOAH") in her Response to Hearing Requests. Mrs. Van Zandt respectfully requests the Commission include the following issues in its Order referring this matter for a contested case hearing, all of which were, timely raised by Mrs. Van Zandt in both her comment and hearing request:

1. Whether the discharge route is adequately characterized;
2. Whether the draft permit is protective of the requester's use and enjoyment of its property in accordance with the Texas Surface Water Quality Standards; and
3. Whether the draft permit has appropriate aquatic nutrient limitations to protect against the excessive growth of algae.

Mrs. Van Zandt requests the Commission refer the above three issues, all relevant to the Application and within the Commission's jurisdiction, along with the nine that the ED has already recommended for referral to SOAH, for a final twelve issue hearing. For clarity, the twelve issues Mrs. Van Zandt recommends for referral are as follows:

1. Whether the discharge route is adequately characterized;

2. Whether the draft permit is protective of the requester's use and enjoyment of its property in accordance with the Texas Surface Water Quality Standards;
3. Whether the draft permit has appropriate aquatic nutrient limitations to protect against the excessive growth of algae;
4. Whether the draft permit contains adequate provisions to protect water quality, including that of surface water, groundwater, and drinking water wells;
5. Whether the draft permit is adequately protective of human health;
6. Whether the draft permit is protective of wildlife and wildlife habitat, in accordance with the Texas Surface Water Quality Standards in 30 TAC Chapter 307;
7. Whether Applicants complied with applicable public notice requirements;
8. Whether the draft permit contains adequate licensing requirements;
9. Whether the draft permit adequately addresses nuisance odor, in accordance with 30 TAC § 309.13(e);
10. Whether the Application is accurate, contains all required information, and is substantially complete;
11. Whether the Applicants' compliance history gives cause for additional terms and considerations to be added to the draft permit to ensure compliance; and
12. Whether the Commission should deny or alter the terms and conditions of the draft permit based on consideration of need, under Texas Water Code § 26.0282 and the general policy to promote regional or area-wide systems, under Texas Water Code § 26.081.

Mrs. Van Zandt agrees with both the ED and OPIC's recommendation to grant her hearing request as an affected person in this matter. Mrs. Van Zandt further respectfully requests the Commission refer the twelve issues included herein to SOAH for a contested case hearing.

Yours very truly,

*/s/Bobby M. Salehi*

Bobby M. Salehi

BMS/mah