

NATIVE CHAOS HOLDINGS

Independent Transparency Initiative

Pre-Release Courtesy Distribution | Independent Compliance Research

July 10, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

Texas Commission on Environmental Quality
Water Utilities Division
12100 Park 35 Circle
Austin, Texas 78753

Re: Pre-Release Courtesy Copy — Environmental and Water Utilities Findings, City of Chandler, Texas

Dear Public Information Coordinator:

Native Chaos Holdings, an independent transparency initiative publishing independent compliance research, is pleased to provide a courtesy pre-release copy of a Non-Compliance Findings Report concerning the City of Chandler, Texas Code of Ordinances, with particular focus on environmental, water utilities, and related provisions in Chapters 5, 6, and 13. The research reviews publicly available provisions of the City Code against applicable state environmental and water law, including TCEQ rules.

The findings within TCEQ's regulatory jurisdiction are as follows:

- **CRITICAL** — §13.04.009: Drought Contingency Plan update approximately 7.5 years overdue. The ordinance text states the plan 'will be mandatory reviewed and updated on or before November 2018,' but no update has been adopted. The underlying data (2014 population of 3,034, well capacities, storage figures) is materially out of date for emergency-response planning. This is an active, ongoing violation of 30 TAC §288.20(c), which mandates that a drought contingency plan be 'reviewed and updated as appropriate at least once every five years.' Native Chaos Holdings recommends that the responsible jurisdiction commission an updated Drought Contingency Plan reflecting current well capacity, population served, and storage data, re-adopt by ordinance, and re-notify the TCEQ executive director per §13.04.009(a)'s five-business-day notice requirement once the update is adopted.
- **HIGH** — §13.03.137: Damaging/tampering with sewer system provision requires review for consistency with TCEQ rules and statutory authority.
- **HIGH** — §13.05.045: Solid waste container/placement provision requires review for consistency with TCEQ rules.
- **HIGH** — §13.06.009: Use of sanitary sewer system provision requires review for consistency with TCEQ rules and statutory authority.
- **MEDIUM** — §6.04.003: Well-protection buffer zones (10/50/150/300 feet, ¼ mile) extend into the extraterritorial jurisdiction. The general-law police-power authority does not extend into the ETJ absent specific statutory grant. The ordinance implicates 30 TAC §290.41(c)(1)(F) sanitary-control requirements.
- **MEDIUM** — §13.02.003, §13.03.126, §13.03.143, §13.05.047: Various utility provisions require review for TCEQ alignment.
- **LOW** — §6.04.004: Unqualified 'right of entry' for inspections lacks 'reasonable time,' notice, and credentials requirements; risks Fourth Amendment challenge.
- **LOW** — §5.06.004, §13.03.077, §13.03.128: Outdoor burning, cross-connection control, and stormwater provisions should be cross-checked against current 30 TAC rules.

Findings Routed to TX-TCEQ

Ordinance	Category	Severity	Description
§13.04.009	CONFLICT (TCEQ RULE)	CRITICAL	Drought Contingency Plan 7.5 years overdue
§13.03.137	CONFLICT	HIGH	Damaging/tampering with sewer system
§13.05.045	CONFLICT	HIGH	Solid waste containers/placement
§13.06.009	AUTHORITY GAP/CONFLICT	HIGH	Use of sanitary sewer system
§6.04.003	AUTHORITY (ETJ)	MEDIUM	Well-protection buffer zones
§13.02.003	AUTHORITY GAP	MEDIUM	Utility termination for nonpayment
§13.03.126	OUTDATED	MEDIUM	Hazardous/toxic materials citation
§13.03.143	CONFLICT	MEDIUM	Authority to disconnect service
§13.05.047	CONFLICT	MEDIUM	Failure to pay solid waste bills
§6.04.004	CONSTITUTIONAL	LOW	Unqualified right of entry
§5.06.004	DRIFT	LOW	Outdoor burning vs. 30 TAC rules
§13.03.077	OUTDATED	LOW	Cross-connection control program
§13.03.128	OUTDATED	LOW	Stormwater/unpolluted drainage

Native Chaos Holdings intends to make the full audit report publicly available no earlier than 30 days from the date of this letter. Native Chaos Holdings respectfully requests the opportunity for any agency technical review of these environmental provisions during this period. Should TCEQ elect to provide guidance on any of the foregoing findings, Native Chaos Holdings would welcome the opportunity to incorporate that guidance into a supplemental findings annotation before public release. Any inquiries may be directed to Native Chaos Holdings using the contact information set forth above.

Respectfully submitted,

Native Chaos Holdings

Independent Transparency Initiative

Mailing: PO BOX 1552, Chandler TX 75758

Email: Chandler@NativeChaosHolding.com

Enclosure: Independent Non-Compliance Findings Report (Full Text)

Distribution Tracking Code: NCH-TX-CEQ-20260710

APPENDIX — AGENCY PROFILE & DISTRIBUTION TRACKING

Agency Contact Information

Field	Value
Agency	Texas Commission on Environmental Quality
Division	Water Utilities Division / Office of Water
Main Address	12100 Park 35 Circle, Austin, TX 78753
Main Phone	(512) 239-1000 / 1-800-687-4040
Public Information	(512) 239-3143
Customer Service	oce@tceq.texas.gov

Drought / Water Utilities	https://www.tceq.texas.gov/permitting/water_supply/water-rights
Region 5 — Tyler	2916 Teague Drive, Tyler, TX 75701 (903) 535-5100

Distribution Tracking

Field	Value
Letter Date	July 10, 2026
Distribution Tracking Code	NCH-TX-CEQ-20260710
Delivery Method	Certified Mail — Return Receipt Requested + Email
Prepared By	Native Chaos Holdings (Independent Transparency Initiative)
Source Document	Chandler_Dillons_Rule_Audit_CORRECTED.docx (June 18, 2026); Chandler_Dillons_Rule_Audit_Severity_Edition.docx (June 19, 2026)
Public Release Date	August 9, 2026 (30 days from distribution)
Document Classification	CONFIDENTIAL — INDEPENDENT RESEARCH
Native Chaos Holdings	Independent research initiative; not affiliated with or representing the City of Chandler, its City Council, or any City official

Reviewer Notes (for Agency Use)

Native Chaos Holdings welcomes written comments and guidance from your office within 30 days of this distribution. Comments may be returned via email to Chandler@NativeChaosHolding.com with subject line including the Distribution Tracking Code above. All feedback will be incorporated into a supplemental findings annotation before public release of the full audit. This packet is provided for informational purposes only and does not represent, coordinate with, or request action by the City of Chandler, Texas, its City Council, or any other City official.

STATUTE CITATION UPDATE (July 10, 2026)

All statutory citations in this letter have been verified against the current text on statutes.capitol.texas.gov. Key precise citations include:

- LGC §54.001(b): General ordinance fine cap is \$500 (Class C misdemeanor per Penal Code §12.23); \$2,000 only for fire safety, zoning, or public health and sanitation (other than dumping or refuse).
- HS §822.042(b): Owner has 15 days to appeal a dangerous-dog determination ("Notwithstanding any other law, including a municipal ordinance"). Destruction order is stayed for 10 calendar days during appeal.
- LGC §229.001(b): Municipality may not regulate possession of a firearm or air gun in a park or public meeting place owned or leased by a political subdivision (including the city itself).
- HS §388.003: Statewide energy code (current IECC edition) is mandatory.
- Tax Code §351.101: Hotel occupancy tax revenue is strictly limited to tourism, convention, and advertising purposes — no unrestricted diversion to the general fund is permitted.
- NRC §81.0523(b)–(c): Railroad Commission has exclusive jurisdiction over oil and gas operations; subsurface well construction, casing, cementing, and pipeline permitting are preempted unless strictly limited to aboveground activity.

These updates strengthen the findings. The full updated report is enclosed.