

NATIVE CHAOS HOLDINGS

Independent Transparency Initiative

Pre-Release Courtesy Distribution | Independent Compliance Research

July 10, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

Texas Department of Housing and Community Affairs
Manufactured Housing Division
P.O. Box 13941
Austin, Texas 78711-3941

Re: Pre-Release Courtesy Copy — Manufactured Housing and Park Standards, 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 manufactured housing and manufactured home park provisions in Chapter 14 (Zoning), Part 1 and Part 2. The research reviews publicly available provisions of the City Code against applicable state law and TDHCA jurisdiction.

The findings within TDHCA's manufactured housing jurisdiction are as follows:

- **CRITICAL** — Chapter 14 Part 2 (Exhibit 14A Fee Schedule): A fee or fine provision in the Chapter 14 Part 2 Fee Schedule exceeds a statutory cap without independent enabling authority. The responsible jurisdiction should identify the specific provision, confirm the statutory cap, and amend to bring within statutory limits.
- **HIGH** — Chapter 14 Part 1: Manufactured Home Park Operator Licensing. The City Code includes a manufactured home park (MHP) operator licensing, annual permit, inspection, and suspension/revocation scheme. The jurisdiction should evaluate whether these provisions constitute business licensing (a preempted field for general-law Type A municipalities) or remain within the City's pure zoning authority under LGC Chapter 211. The analysis turns on whether any specific enabling statute (beyond LGC Ch. 211) authorizes general-law-city licensing of manufactured home park operations.
- **HIGH** — Chapter 14 Part 1: Zoning 'family' definition with occupancy limits by relatedness may conflict with federal Fair Housing Act protections for group homes, persons with disabilities, and familial status. Cross-reference to HUD Region VI review.
- **MEDIUM** — Manufactured Home Installation Standards: Local installation, tie-down, and skirting standards may duplicate or conflict with state standards under Occupations Code Chapter 1201 administered by TDHCA.
- **MEDIUM** — Procedural Authority: All special exceptions, variances, and land-use regulations affecting manufactured homes should route through a properly constituted LGC §211.009 board of adjustment.

Findings Routed to TX-TDHCA

Ordinance	Category	Severity	Description
Ch.14 Pt.2 Fee	PENALTY/FEE CAP	CRITICAL	Fee exceeds statutory cap
Ch.14 Pt.1 MHP	AUTHORITY/PREEMPTION	HIGH	MHP operator licensing — Occ. Ch. 1201
Ch.14 Pt.1 Family	FAIR HOUSING	HIGH	Family definition vs. FHA
MHP Standards	POTENTIAL CONFLICT	MEDIUM	Installation/tie-down/skirting

Ch.14 BOA	PROCEDURAL	MEDIUM	BOA process for manufactured homes
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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 manufactured housing provisions during this period. Should TDHCA 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

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

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APPENDIX — AGENCY PROFILE & DISTRIBUTION TRACKING

Agency Contact Information

Field	Value
Agency	Texas Department of Housing and Community Affairs
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Distribution Tracking

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Native Chaos Holdings	Independent research initiative; not affiliated with or representing the City of Chandler, its City Council, or any City official
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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.