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Public Comment for May 14 Planning Commission Hearing - WCF Code Amendment

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**From** [REDACTED]  
**Date** Tue 4/28/2026 4:17 PM  
**To** Waines, Jon <JWaines@brightonco.gov>  
**Cc** Shipman, Grey <GShipman@brightonco.gov>; Comdev, Planner <Planner@brightonco.gov>

 4 attachments (11 MB)  
CDC-Niosh.pdf; WHO.pdf; EPA dieselexhaustus.pdf; IARC WHO Ehaust.pdf;

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Dear Mr. Waines and Planning Commission Members,

Please accept this written public comment for the May 14, 2026 Planning Commission hearing regarding the proposed Wireless Communication Facilities Code Amendment.

My comment is limited to citywide land-use policy, code clarity, and future standards for emerging high-load technology uses.

I understand from the public notice that this hearing concerns amendments to Article 10 of the Land Use and Development Code related to Wireless Communication Facilities, including changes intended to comply with state law and clarify existing WCF regulations.

Because this is a citywide technology-infrastructure code amendment, I respectfully request that the Planning Commission and staff clarify on the record that this WCF amendment does not authorize, classify, regulate, or create a review path for data centers, AI compute facilities, server farms, modular data centers, high-load computing facilities, or similar high-resource industrial technology uses.

I am raising this because data centers and high-load computing facilities can raise land-use impacts that are different from ordinary wireless communication facilities, including continuous mechanical cooling noise, low-frequency hum, backup-generator noise, backup-generator emissions, high electrical demand, fire-safety issues, and compatibility concerns near residential areas and other sensitive receptors.

If data centers or high-load computing facilities are not addressed by this WCF amendment, I respectfully ask that the Planning Commission refer this issue to City staff and Long Range Planning for consideration as a separate citywide land-use-code topic. I also ask that the City not rely on broad existing use categories, such as industrial, warehouse, manufacturing, technology, utility, or wireless communication categories, to process such uses without clear definitions, public notice, public review, and enforceable performance standards.

For any future citywide code work, I ask the City to consider requiring:

1. A specific Land Use and Development Code definition for data centers, AI compute facilities, server farms, modular data centers, and high load computing facilities;
2. Conditional Use Permit, special use, or other discretionary public review approval for such facilities above defined thresholds;
3. Public notice and neighborhood meeting requirements;
4. Noise studies evaluating continuous operations, nighttime conditions, cumulative equipment noise, and both dBA and dBC/low frequency impacts;
5. One third octave band frequency analysis where low frequency mechanical noise may be present;
6. Disclosure and review of backup generators, including number, fuel type, testing schedule, emissions controls, and applicable air permits;
7. Residential setbacks, acoustic screening, and buffering from homes, schools, parks, and other sensitive receptors;
8. Enforceable operational limits and ongoing compliance monitoring, rather than relying only on initial site plan review.

I am particularly concerned that dBA-only noise standards may be inadequate for facilities that generate continuous low-frequency mechanical noise from cooling equipment, fans, transformers, or backup generators. Some foundational public-health guidance on low-frequency noise is older, but its core technical point remains relevant: dBA-only measurements can understate low-frequency noise. The World Health Organization's Guidelines for Community Noise states that when prominent low-frequency components are present, A-weighted measures are inappropriate, and that the difference between dB(C) and dB(A) can provide information about low-frequency components. WHO further recommends frequency analysis when the difference between dB(C) and dB(A) is more than 10 dB.


More recent federal sources support this concern. A CDC/NIOSH low-frequency-noise evaluation documented conditions where measured indoor levels were only 26.5–39.8 dBA, while C-weighted levels were 55.9–67.2 dBC, demonstrating how dBA-only measurements can understate low-frequency noise impacts.

I am submitting a limited set of public-health references for the record to support a citywide policy request for future data-center and high-load-computing standards.

I respectfully request that this comment and the attached materials be included in the public record for the May 14 Planning Commission hearing.

Thank you for your time and consideration.

Sincerely,  
Angela Pirrone

  
Brighton, CO 80601