A municipal review standard for data centers

DATA CENTER ACCOUNTABILITY PROJECT | MUNICIPAL HANDOFF v1.0 | October 9, 2026

Proposed policy and working checklist. This document is ready for municipal staff and public review. It is not an adopted ordinance, an engineering certification or a finding that Project Silo is approved or permanently cancelled. Existing requirements, proposed safeguards and illustrative calculations are identified separately.

The proposed rule

Review the whole campus and each building against the laws that actually apply, verified infrastructure capacity, measured community impacts and enforceable operating conditions. No project should advance past a gate unless the evidence required for that stage supports the applicable approval criteria.

Three decisions, then ongoing accountability

Gate	Municipal decision
1. Completeness	Identify jurisdiction, existing zoning, the actual operation and maximum foreseeable campus scope. Require missing studies under existing authority or an adopted rule.
2. Suitability and entitlement	Decide location compatibility, infrastructure feasibility, cumulative impacts and public costs before discretionary land-use approval.
3. Construction and operation	Verify final permits, funded improvements, inspections and commissioning before the relevant activity or occupancy.
4. Continued compliance	Monitor actual performance, complaints, expansions, transfers and closure obligations.

How a reviewer records a result

For every numbered checklist item enter: status (PASS / FAIL / HOLD / N/A); controlling provision and version; evidence link; reviewer and date; unresolved issue; condition or correction; deadline and approval stage. N/A requires a signed explanation. Receipt of a document is not a finding of compliance.

Working review tiers - DCAP proposal, not legal zoning categories

Baseline review applies to every dedicated data center. For discussion, enhanced review is triggered at **30 MW facility peak for one building or 60 MW aggregated campus peak**; regional-scale review at **100 MW campus peak**. These are draft screening choices, not a safe-impact threshold. Multi-building/shared-infrastructure projects and material receptor impacts warrant enhanced review regardless of MW. Unknown loads are a HOLD on classification until bounded.

Require adoption and engineering justification before using numeric tiers. SB26-102 proposed different threshold wording but was postponed indefinitely; it did not become law. Floor area, generator fleet, water and proximity remain independent triggers. [S8]

Project Silo: what the record supports

Current status

Brighton reports October 6 approval of a one-year moratorium at first reading, with second reading scheduled October 20. As of this review, that establishes neither final adoption nor an effective date. Withdrawal has been publicly reported; obtain the signed withdrawal, scope and case-status history before treating any related application as closed. [S1]

Project baseline and jurisdiction

The July 2025 preapplication lists 156 acres, existing A/R and I-1 (PUD) zoning, and agricultural farming. The concept drawing depicts eight footprints. These are historical proposal records, not current approvals. [S2-S3]

The PAC identifies annexation in 1991 and the city review sequence: public Planned Development, public Subdivision Plan, administrative Final Plat/Development Agreement, administrative Site Plans, then building permitting. PD approval precedes the subdivision hearing; plat recording precedes site-plan approval. [S4]

Brighton is the land-use authority reflected in this record. Check county rules for unincorporated sites and separately governed offsite works; consult Lochbuie and Weld about cross-boundary impacts. Do not assume all three governments independently zone the same city parcel.

Concept-plan land accounting

Concept category	Acres	Interpretation
Data-center developable areas	69.7	38.5 + 31.2; not building footprint
Data-center accessory area	20.9	Separate concept category
Potential secondary use	21.1	Use is not established
Switching station	9.9	Capacity is not specified
Detention / open space	17.3 / 2.6	Concept allocations
Labeled total / unallocated difference	141.5 / 14.5	Difference from 156; not a verified use

The concept labels 50th Avenue arterial (110-ft right-of-way) and East New Energy Drive collector (50-ft right-of-way). Building-to-property-line annotations are not house distances. Survey equipment-to-receptor distances before judging impacts. [S3]

Building size: reported, not confirmed by dimensioned drawings

Denver7 reports eight two-story buildings of approximately 315,000 sq ft each. If that is gross floor area, 8 x 315,000 = **2,520,000 sq ft**. Do not double it again for two stories without a floor schedule. A two-equal-floor assumption would imply 157,500 sq ft footprint per building, not a measured fact. [S17]

The primary files examined do not establish final IT/facility MW, generator count, cooling water, operating noise, operator, equipment-to-home distances or full infrastructure costs. Those inputs must come from current applicant and provider records.

One building first: the process must cover eight

A first-building application on a shared campus

Interpret the requested example as Building 1 on one eight-building campus. A one-building standalone proposal follows the same logic, with its own complete site boundaries and infrastructure. The campus master review protects against approving Building 1 while leaving the other seven buildings and shared systems unexamined.

Stage	Evidence and decision
Preapplication	Confirm case status, owner authorization, current zoning and proposed use. Identify all eight buildings, shared switching/generation/cooling and offsite corridors. Establish study scopes and public-review route.
Public land-use stage	Review full-buildout compatibility, service feasibility, cumulative noise/air/water/traffic, alternatives and cost obligations. Set a lawful maximum campus envelope and phase conditions. Publish evidence before the hearing.
Subdivision and agreements	Secure parcel layout, public improvements, utility easements, drainage and funded obligations. Preserve legal prerequisites between stages.
Building 1 site and permit stage	Show that shared systems and Building 1 fit the approved envelope. Complete detailed utility, fire, air and construction approvals at the legally required stage.
Building 1 commissioning	Verify required infrastructure, inspections and performance. Test credible operating cases; require later full-load/seasonal confirmation when opening occupancy is too low.
Buildings 2-8	Check remaining and cumulative capacity at each phase. New load, cooling, generator or operator changes may trigger new studies, conditions, public notice or approval under adopted rules.

Existing Silo-specific submissions to verify

The PAC calls for traffic and drainage studies, phased utilities, a tap memo per site plan, water-resource reporting and raw-water dedication. It identifies 50th Avenue improvements and fire review. Obtain the completed submissions and agency responses; a preapplication comment is not evidence of compliance. [S4]

Highest-priority records request

Request existing records: written withdrawal with submission/receipt timestamps and attachments; city acknowledgement and current status of every associated case; latest PD, subdivision and site-plan files; dimensional area schedule; utility studies/letters; noise/air/water/traffic files; signed agreements and claimed vesting instruments. Follow the existing request tracker and avoid duplicating fulfilled requests.

What is a functional traffic road?

Use the term **adequate public-road and emergency-access connection**. Functional classification describes a road's network role: arterials emphasize mobility, collectors link local roads with arterials, and local roads emphasize property access. Adequacy additionally requires legal access, sufficient pavement/bridge loading, geometry, sight distance, intersection capacity, safe freight routes and fire access. A nearby paved road is not proof of suitability. [S12]

What would stop advancement under the proposed policy?

An unbounded full-campus load, unsupported zoning classification, unknown utility deliverability, missing applicable notice, unresolved safety findings or unenforceable mitigation produces HOLD or denial based on adopted criteria. Do not invent an automatic retroactive rule or impose new obligations without legal authority.

Scale math: illustrative inputs, transparent results

NOT PROJECT SILO DEMAND ESTIMATES. Building count or square footage cannot determine MW or gallons. The following sensitivity exercise shows why the applicant must disclose equipment and cooling design.

Power example

Assume each building has 20 MW IT capacity, averages 80% of that capacity, and has annual PUE 1.25. Average IT load = 16 MW. Annual IT energy = 16 x 8,760 = 140,160 MWh. Facility energy = 140,160 x 1.25 = 175,200 MWh/year. [S10; DCAP arithmetic]

Metric	One building	Eight identical buildings
IT installed capacity	20 MW	160 MW
Average facility demand	20 MW	160 MW
Annual facility energy	175,200 MWh	1,401,600 MWh
Illustrative peak*	25 MW	200 MW

*Peak uses a separate assumed design overhead factor of 1.25 at full IT load. Annual PUE does not establish peak demand. Shared services, phase timing and load diversity may change campus totals. 8,760 hours assumes a non-leap year.

Cooling-water sensitivity

Site WUE = annual site water liters / annual IT energy kWh. Using the same IT energy and specified WUE boundaries yields the table below. These annual averages cannot size peak-day service. [S10; DCAP arithmetic]

WUE L/kWh	1 building gal/yr	Avg gal/day	8 buildings gal/yr	Avg gal/day
0.2	7.405 million	20,288	59.242 million	162,307
1.0	37.026 million	101,442	296.211 million	811,537
2.0	74.053 million	202,884	592.422 million	1,623,073

Distinguish supply withdrawals, evaporative consumption and wastewater. This scenario does not claim these WUE values are the selected design or a representative range for Silo. Include sanitary, irrigation and fire requirements consistently with the stated metering boundary.

Equipment and combined-noise worksheets

Backup units = ceiling(required backed-up MW / usable derated MW per unit) + specified redundancy. Example only: 25 MW backed-up load / 2.5 MW usable units = 10, plus one N+1 unit = 11 per building, or 88 for eight identical independent systems. Actual backup load, altitude/heat derating and shared design must be supplied.

Fuel storage = operating units x vendor gallons/hour at stated load x required hours, plus reserves. Emissions = sum(kW x hours x grams/kWh) / 907,184.74, in US short tons, using regulator-approved factors and assumptions. No fuel or emission total is calculable from these records.

For eight independent sources with equal contributions at the same receptor, sound increases by 10 log10(8) = 9.03 dB over one source. This is not a prediction of Silo noise; distance, shielding, spectra, weather and equipment determine real levels.

Checklist / Jurisdiction, zoning and public review

DCAP PROPOSED CHECKLIST | Apply to each building AND full campus. Municipal counsel must identify controlling law, authority and timing before enforcing an item.

01. Jurisdiction and controlling rules

Stage: INTAKE | **Reviewer:** Planning + municipal counsel

Require: Parcel IDs, legal descriptions, annexation boundaries, offsite facilities, owner authorization; a matrix of federal/state permits, applicable county/city rules, district rules and utility requirements, with section and effective date.

Decision: Identify the actual land-use authority for every location. Resolve conflicting rules, moratoria, existing approvals and claimed vested rights in writing. County geography alone does not establish county zoning jurisdiction.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

02. Existing zoning and lawful use

Stage: BEFORE LAND-USE DECISION | **Reviewer:** Planning + counsel

Require: Official zoning verification, original PUD/PD text and amendments, permitted-use determination, adopted comprehensive-plan map, overlays, setbacks, height and screening standards; requested changes and approval sequence.

Decision: Explain why the operation fits the adopted use classification. Industrial zoning alone is insufficient. Evaluate data processing, cooling, power generation and energy storage separately where required. A comprehensive-plan designation is not a zoning approval.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

03. Whole-campus scope and size

Stage: INTAKE / UPDATE EACH PHASE | **Reviewer:** Planning + engineering

Require: Owner, developer, authorized agent and known operator; all parcels, phases and buildings; footprint versus gross floor area; IT capacity, facility peak MW/MVA, generator MW, battery MWh, peak-hour/day water and annual demand.

Decision: Use a master campus envelope and a building-by-building schedule. Identify unknown end-user assumptions and conservative design ranges. Prevent phases or related entities from concealing reasonably foreseeable cumulative impacts.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

04. Receptors and alternative sites

Stage: BEFORE LAND-USE DECISION | **Reviewer:** Planning + public health reviewers

Require: Survey/GIS distances to homes, schools/daycare, playgrounds, hospitals/care facilities, farms, livestock/animal facilities, habitat and neighboring governments; compare feasible industrial locations using the same criteria.

Decision: Measure from actual noise/emission/hazard sources and site boundary to receptors. Apply adopted setbacks and modeled impacts. Explain alternative-site tradeoffs. There is no universal safe distance established by this checklist.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

05. Public record and notice

Stage: BEFORE HEARING / DECISION | **Reviewer:** Clerk + planning

Require: Case page, application and revisions, plain-language scope, studies, referral comments, staff report, notice schedule, mailing list/maps, posting photos and neighborhood-meeting notes; accessible comment channels.

Decision: Meet the exact notice rules for the application and body. Publish material studies before the decision under adopted deadlines. Correct defective notice through the legally required process; a grocery notice or social post cannot substitute for required channels.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

Checklist / Utilities and telecommunications

DCAP PROPOSED CHECKLIST | Apply to each building AND full campus. Municipal counsel must identify controlling law, authority and timing before enforcing an item.

06. Electric capacity and grid connection

Stage: FEASIBILITY BEFORE ENTITLEMENT; FINAL BEFORE ENERGIZATION | **Reviewer:** Serving utility + electrical engineer

Require: Signed capacity/service confirmation with conditions and expiry; interconnection studies, ramp schedule, peak and annual load, substations/feeders/transmission, power quality, contingency and redundant-feed design.

Decision: State what capacity exists now, what depends on upgrades and who funds them. Confirm legal easements and schedules. Renewable purchases do not establish physical grid capacity. Two feeds must be evaluated for shared failure points.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

07. Gas and onsite generation

Stage: BEFORE RELEVANT PERMITS | **Reviewer:** Gas provider + fire + air authority

Require: State whether gas is needed. If so: hourly/daily demand, pressure, pipeline route and capacity, easements, turbines/engines/boilers/fuel cells, emissions and emergency isolation plans.

Decision: Provider confirms deliverability and safe routing. Separate emergency backup from continuous generation or demand-response operation. A nearby pipeline is not a service commitment; do not assume every data center uses gas.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

08. Water supply and cooling

Stage: FEASIBILITY BEFORE ENTITLEMENT; FINAL BEFORE SERVICE | **Reviewer:** Water provider + water resources

Require: Cooling/heat-rejection schematic, water rights/source and supply report, withdrawals versus consumption, annual/peak-day/peak-hour demands, drought/heatwave case, reuse, treatment, fire flow and phased capacity.

Decision: Demonstrate full-buildout supply and phase deliverability alongside existing commitments. State WUE boundaries. Closed-loop server cooling does not prove zero site water use. Supply connection and water rights are separate questions.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

09. Wastewater and pretreatment

Stage: BEFORE SERVICE / OPERATION | **Reviewer:** Sewer collection + treatment authorities

Require: Sanitary and process flows separately; blowdown volume, temperature, dissolved solids and chemicals; sewer route/pump capacity, treatment capacity, pretreatment determination, connection and discharge approvals.

Decision: Both collection and treatment authorities accept quantity and quality. Fund necessary upgrades and monitoring. Do not assume water supplied equals wastewater returned; do not permit unapproved process discharge.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

10. Telecommunications transport

Stage: BEFORE CONSTRUCTION OF CORRIDORS / OPERATION | **Reviewer:** Carriers + right-of-way authorities

Require: Carrier capacity confirmations, fiber/conduit routes, rights-of-way, crossing permits, easements and restoration plans; physical diversity diagram if redundant transport is claimed.

Decision: Confirm actual capacity and legal routing. Two carriers sharing one trench are not physically diverse routes. Security-sensitive detail may be protected where lawful, while publishing a meaningful public summary. No universal two-path-per-building rule is asserted.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

Checklist / Air, hum, roads and safety

DCAP PROPOSED CHECKLIST | Apply to each building AND full campus. Municipal counsel must identify controlling law, authority and timing before enforcing an item.

11. Air emissions and generator fleet

Stage: APPLICABILITY BEFORE ENTITLEMENT; PERMITS BEFORE TRIGGERED ACTIVITY | **Reviewer:** CDPHE APCD + qualified air reviewer

Require: Every engine/turbine: location, rated and derated output, fuel, stack, operating modes, emission factors, annual hours; campus potential-to-emit and source-aggregation analysis; APEN/permit determination and modeling.

Decision: Obtain regulator determination of applicable rules and timing. Assess routine testing, outages and any nonemergency use distinctly. Never label a unit emergency solely to avoid rules. Local approval does not replace an air permit. [S11]

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

12. Noise, hum and vibration

Stage: BEFORE ENTITLEMENT / COMMISSIONING / EACH EXPANSION | **Reviewer:** Acoustical reviewer + code enforcement

Require: Day/night baseline; full-campus cooling, transformers, generator testing/outage and truck modeling; dBA, dBC, tones and appropriate frequency-band analysis; worst weather/load assumptions and receptor locations.

Decision: Meet locally adopted measurable limits with uncertainty margin and funded mitigation. Require field verification at credible operating loads. Vegetation or a wall shown on a drawing does not demonstrate compliance. Loudoun provides a pre/post-study precedent, not Colorado law. [S13]

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

13. Adequate road and emergency connection

Stage: BEFORE CONSTRUCTION TRAFFIC / OCCUPANCY | **Reviewer:** Road owners + public works + fire

Require: Legal access; official road class, traffic study, construction versus operating trips, freight routes, bridge/pavement loads, turning templates, sight lines, intersections, queues, school crossings and evacuation access.

Decision: Approve safe routes and fund upgrades before the phase that needs them. Road proximity or an arterial label alone does not prove adequacy. Include fuel tankers, cranes and heavy electrical equipment, plus safe pedestrian/cyclist access.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

14. Fire, batteries and hazardous materials

Stage: BEFORE BUILDING PERMITS / OCCUPANCY | **Reviewer:** Fire district + building official

Require: Applicable adopted code editions; battery chemistry and MWh, thermal-runaway controls, ventilation/suppression, fuel tanks and containment, transformer fluids, chemical inventories, hydrants/fire flow and apparatus access.

Decision: Fire authority approves hazard analysis and response capability. Identify applicable equipment/testing standards for the actual system; do not assume every UPS has identical requirements. Fund necessary training, equipment and mutual-aid arrangements.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

15. Drainage, site safety and environmental permits

Stage: BEFORE DISTURBANCE / BUILDING PERMITS | **Reviewer:** Civil engineer + applicable environmental agencies

Require: Grading/geotechnical study, floodplain/wetland applicability, drainage, detention/water quality, construction stormwater, erosion controls, spill runoff, habitat and lighting/glare analysis.

Decision: Obtain permits triggered by the actual site and activities. Maintain detention and spill controls through each phase. Preserve irrigation/ditch access and neighboring drainage. An industrial stormwater permit is not automatically required solely because the use is a data center.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

Checklist / Costs, conditions and accountability

DCAP PROPOSED CHECKLIST | Apply to each building AND full campus. Municipal counsel must identify controlling law, authority and timing before enforcing an item.

16. Financial responsibility and public costs

Stage: BEFORE AGREEMENTS / FINAL APPROVAL | **Reviewer:** Finance + utilities + counsel

Require: Capital/operating costs for power, water, sewer, roads, fire and monitoring; developer obligations, subsidies, rates, security, maintenance and withdrawal/default scenarios; independently reviewed fiscal analysis.

Decision: Assign payer and enforceable security for each obligation. Compare claimed permanent jobs and public revenues with documented costs. Require proportionate, legally authorized obligations; do not impose unsupported fees or promises.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

17. Regional coordination and independent review

Stage: BEFORE LAND-USE DECISION | **Reviewer:** Lead planner + affected agencies

Require: Referral log and responses from adjacent jurisdictions, utilities, fire, schools, health and road/ditch authorities; municipal-selected specialist reviews funded under lawful authority; response to unresolved comments.

Decision: Require affirmative capacity/safety findings for critical services under adopted policy. Identify disagreements and authority to resolve them. Agency silence should not be treated as proof of available capacity. Referral does not automatically give a neighboring town a veto.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

18. Conditions, permits and phase release

Stage: BEFORE APPROVAL / EACH RELEASE | **Reviewer:** Planning + counsel + responsible departments

Require: Findings against adopted criteria; conditions matrix linking each demand/noise/safety limit and mitigation to a reviewer, deadline, permit, measurement method, public evidence and remedy.

Decision: Approve only what the record supports; condition later-stage detail where lawful. Do not postpone fundamental suitability/capacity questions until after binding entitlement. No permit or phase release based solely on an unsupported future promise.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

19. Commissioning and ongoing verification

Stage: BEFORE OPERATION / AFTER OCCUPANCY | **Reviewer:** Building/fire + utility + environmental reviewers

Require: Inspections, commissioning at credible loads, noise field tests, utility meters, applicable emission compliance, emergency drills; annual resource reporting and complaint/response log with privacy protections.

Decision: Specify safe test conditions, seasonal follow-up and maximum approved loads. Publish compliance summaries. Establish funded corrective action and sanctions permitted by law. A nearly empty opening-day building cannot verify full-load campus noise.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

20. Changes, transfers and end of use

Stage: EACH MATERIAL CHANGE / CLOSURE | **Reviewer:** Planning + counsel + utilities

Require: Change register for operator, MW, cooling, engines/batteries, layout and phases; transfer obligations; decommissioning/reuse plan, e-waste handling, tank/battery removal, restoration and financial assurance.

Decision: Reassess material changes against adopted triggers; renotice/reapprove when law requires. Attach obligations to accountable entities and approvals as lawful. Prefer safe reuse while protecting against abandoned equipment and unfunded infrastructure.

Status: _____ Authority: _____ Evidence: _____
Reviewer/date: _____ Correction/condition + deadline: _____

Public notice that people can actually read

Existing law versus proposed improvement

Different rules govern ordinary meeting agendas, land-use hearings and newspaper publication. Verify each trigger independently. Brighton Article 2 provides 15-day website/site/mailed notice where required; its posted signs must be visible from public ways. Its listed default mailed radius is 300 ft, with specified 1,000-ft provisions and discretionary expansion. Technical studies may be applicant-funded. [S5]

Colorado HB26-1095 took effect August 12, 2026: newspapers publishing county/municipal legal notices must also provide free online access. This does not replace other applicable publication duties. [S9]

C.R.S. 24-6-402 governs ordinary open-meeting notice and records. A qualifying online agenda route can differ from physical posting. Have the clerk/counsel verify current statutory subsections, the designated posting resolution and local minute rules; do not substitute a 24-hour agenda for a longer zoning notice. [S16; verification item]

Proposed notice-quality clause

Every physical notice shall remain stationary, unobstructed and continuously readable during advertised public-access hours. A notice shall not be placed on or behind a moving door, covered by another display, or positioned where reading requires trespass, entering traffic or obstructing an entrance. The responsible clerk shall retain dated photographs from the public viewing position and a posting log, verify visibility, and correct defects promptly. This supplements required statutory and code notice.

King Soopers: evidence and correction route

The organizer reports a notice behind a sliding door in Brighton that moves when a person approaches. This establishes a reported usability problem, not a verified legal violation. Preserve a short video of the obstruction, wide/context photo, date/time, store location, issuing body, notice text and case/hearing identifier.

Ask the issuing clerk: Is this a designated required location or supplemental posting? What posting rule applies? Where else was notice published, mailed or posted? Request the posting designation, logs/photos and an unobstructed replacement. If required notice failed, ask counsel to identify the lawful cure and whether a hearing must be renoticed.

Where records should appear

Government source of record: a permanent application page linked from legal notices and the hearing agenda; neighborhood-meeting notes with the application; studies/referrals/revisions before decisions; action summary, draft versus approved minutes, recordings, adopted text and effective date afterward. Provide accessible HTML/text alongside PDFs, Spanish summaries as proposed, a phone/contact option and free access without login.

DCAP mirror: propose a **Municipal Policy Toolkit** section on datacenteraccountabilityproject.org with this draft, source register, version history and a feedback route. Label DCAP notes as independent notes, link to official records, and preserve dates. This document does not publish or change that website.

Proposed deadlines: material review packet 30 days before a discretionary hearing; action summary within 2 business days; draft minutes within 10 business days; approved minutes after adoption. These are new recommendations, not verified existing deadlines. Material late revisions should extend meaningful review through a lawful continuance/renotice process.

Turning the checklist into public policy

What public policy means

Public policy is a government's adopted approach to a recurring public issue: what it requires, how decisions are made, who is accountable and how compliance is measured. A community-authored checklist becomes enforceable only through the appropriate lawful action; distributing a PDF does not amend zoning.

Instrument	Appropriate role
Administrative intake checklist	Implements information/study requirements already authorized by existing code. It cannot create new substantive zoning restrictions by itself.
Resolution or policy direction	Directs staff work or adopts a general approach where authorized; does not necessarily amend the land-use code.
Ordinance / code amendment	Establishes lawful use definitions, review triggers, siting/performance standards, hearing requirements and enforcement. Follow required referrals, notice, hearings, readings, publication and effective-date rules.
Site approval / agreement	Applies adopted criteria and lawful project-specific conditions; records improvements, costs, monitoring, security and remedies.

What the current policy comparison tells us

Brighton's June 2025 district descriptions distinguish I-1 intensity with limited neighboring impacts from I-2 activity generally incompatible with residential/commercial uses because of scale and infrastructure. That supports an impact-based classification inquiry, not an automatic finding that every data center legally requires I-2. [S6]

Weld's April 2026 announcement addresses unincorporated land: agricultural prohibition, I-1 special review, I-2/I-3 site-plan review, electricity will-serve/water proof and a 65 dBC property-line limit alongside dBA rules. Confirm adopted text for any county case. Those rules do not automatically govern Silo's city parcel. [S7]

Lochbuie is an affected neighboring jurisdiction. Obtain its current signed ordinance, effective dates and scope before asserting its rules apply to offsite works or any new proposal. No detailed Lochbuie ordinance text was verified in this packet.

Next steps, in order

1. Complete the evidence: track withdrawal and all related cases; obtain current zoning verification and the dimensioned scope/resource schedule. Confirm the October 20 agenda when posted.

2. Submit the proposal for review: send this packet to the responsible clerk/planning office as a policy proposal; request inclusion in the policy-development record and a study-session agenda. No submission has been made in this task.

3. Convene technical review: municipal planner/counsel, utility and water/sewer engineers, fire authority, acoustical/air experts, road owner, schools and neighboring communities. Populate the law/authority columns and replace draft thresholds with justified definitions.

4. Draft and adopt: prepare ordinance language and administrative forms; publish drafts/redlines and comment responses; follow each jurisdiction's required process; publish adopted text, implementation date and reviewer responsibilities.

5. Operate and audit: maintain a public application register, signed gate decisions, annual monitoring and a clear material-change/complaint process. Review effectiveness after one year using actual results.

Source register and verification limits

Research checked October 9, 2026. Primary government/project records guide legal and technical statements; reporting is labeled as reporting. Concept/preapplication documents describe a historical proposal and can change. URLs remain linked for municipal verification.

S1 | Brighton: October 7 official moratorium status
https://www.brightonco.gov/m/NewsFlash/Home/Detail/2985

S2 | Silo preapplication, July 2025; primary record mirrored by DCAP
https://datacenteraccountabilityproject.org/downloads/25-57_23JUL2025_Silo_Willard_Property_Pre_App_R.pdf

S3 | Silo conceptual plan; primary record mirrored by DCAP
https://datacenteraccountabilityproject.org/downloads/Silo_Concept_Plan_2025-06-27.pdf

S4 | Brighton PAC letter, July 31, 2025; primary record mirrored by DCAP
https://datacenteraccountabilityproject.org/downloads/PAC_Comment_Letter_01_7.31.25_R.pdf

S5 | Brighton applications and procedures, Article 2 (November 2024)
https://www.brightonco.gov/DocumentCenter/View/21239

S6 | Brighton districts and uses, Article 4 (June 2025)
https://brightonco.gov/DocumentCenter/View/34441/04_Art4_LUDC

S7 | Weld official adopted-code announcement, April 6, 2026
https://content.govdelivery.com/accounts/COWELD/bulletins/411ca4b

S8 | SB26-102 official bill status: lost; NOT law
https://www.leg.colorado.gov/bills/SB26-102

S9 | HB26-1095: enacted digital newspaper notice requirement
https://www.leg.colorado.gov/bills/HB26-1095

S10 | DOE: PUE, WUE and cooling water mechanics
https://www.energy.gov/cmei/femp/cooling-water-efficiency-opportunities-federal-data-centers

S11 | EPA: Clean Air Act resources for data centers
https://www.epa.gov/stationary-sources-air-pollution/clean-air-act-resources-data-centers

S12 | CDOT: roadway functional classification guidance, April 2024
https://www.codot.gov/programs/planning/assets/plans-projects-reports/reports/cdot-roadway-fun-class-guidance-manual-april-2024.pdf

S13 | Loudoun: adopted noise-study precedent and remaining limitations
https://www.loudoun.gov/6405/Noise-Air-Quality-Concerns

S14 | Brighton legal notices
https://www.brightonco.gov/453/Legal-Notices

S15 | Brighton agendas and minutes
https://www.brightonco.gov/agendacenter

S16 | Colorado official current statute download index
https://content.leg.colorado.gov/agencies/office-legislative-legal-services/2026-crs-titles-download

S17 | Denver7: reported project floor area and building count
https://www.denver7.com/news/local-news/in-your-community/north-metro/brighton-residents-uncover-proposal-for-massive-data-center-campus-spurring-potential-moratorium

Current official 2026 statute downloads were located, but full large statutory files were not retrieved. Exact statutory applicability, local amendments, notice designations and signed Lochbuie text remain verification work for the municipal legal reviewer. No numerical universal receptor setback or noise-safe distance is asserted.