

July 2, 2026

Via email to: Prince William County
Board of County Supervisors

Subject: Nature Forward opposes CPA2026-00012
and the industrialization of 1,900 acres



Dear Prince William County Board of County Supervisors,

Nature Forward opposes CPA2026-00012, the Comprehensive Plan Amendment (CPA) request to ultimately convert over 1,900 acres of primarily Agriculture and Forestry land to industrial use as data centers. As Washington D.C. region's oldest independent environmental organization, in our conservation advocacy we prioritize human health & access to nature, biodiversity & habitats, fighting the climate crisis, and sustainable land use. This Comp Plan Amendment touches on each of those four topic areas.

The Dulles Cloud South proposal, which is reliant on this CPA, is planned to have 43 million square feet of data center space at buildout, likely requiring between 6-12GWs of power, and would have devastating effects on the land, air, watershed, and community.

This CPA would unleash an industrialization of the county at a massive scale at a time when environmental guardrails to better guide data center development are nearly non-existent.

We have seen firsthand what data center buildout looks like. These massive campuses come with incredible amounts of impervious surface at the expense of our natural areas. They come with polluting on-site power generation in addition to massive substations and transmission lines (which affect areas outside of the CPA area). A proposal like this would house *many thousands* of "backup" diesel generators which are increasingly being used, and proposed to be used more frequently, as primary power. Just this past May 2026, the U.S. Department of Energy gave PJM Interconnection permission to data centers to use backup generation as primary power to avoid instituting rolling blackouts.¹ With this week's unprecedented heat wave, with temperatures 100 degrees, the U.S. Department of Energy repeated their May action, again allowing backup generation as primary power.² Federal decisions like this override air protections that locales rely on to

¹ <https://www.utilitydive.com/news/pjm-doe-emergency-order-curtail-data-centers/820571/>

² <https://theenergymag.com/news/2026-07-01/doe-pjm-ai-backup-power>



protect air quality for their residents. The best way to protect our air is to not allow these generators to be present in the first place, through a denial of this CPA.

This CPA would literally pave the way to worsen our climate crisis and directly affect the quality of life in not only the Gainesville Magisterial District, but surrounding areas as well particularly with threats to our air quality and water supply. Of significant concern is the Occoquan Reservoir which supplies drinking water for nearly 800,000 people in both Prince William and Fairfax Counties and the City of Alexandria.

The choices made here for this CPA affect far more than just Prince William County. Other parts of the state won't be able to supply water resources if the Occoquan watershed is not protected. This CPA would also have direct effects on increasing the strain on our region's electric grid and on the price of energy bills in Virginia and beyond.

With our General Assembly failing to pass robust and comprehensive guardrails and oversight, our region's local land use decisions are our last line of defense to protect what we have until regulations catch up to protect our residents, communities, and resources. Our state has failed to take responsibility for oversight, which has left our locales as the ones accountable for their impact on the rest of the state, the electric grid, and our energy bills.

Nature Forward opposes CPA2026-00012. This denial should be straightforward, as the CPA is not consistent with the County's overall policies or watershed protection goals. Nature Forward asks that the Board of Supervisors deny the CPA proposal based on this inconsistency. We ask that you not trade our residents' health for profit in the hands of the world's richest companies.

Sincerely,

Renee Grebe
Northern Virginia Conservation Advocate
Nature Forward