Clarke County Sanitary Authority

Roderick DeArment
C. Wayne Armbrust
Tom Bauhan
Lee Coffelt
Bryan Conrad

Valley Link Transmission, LLC c/o WSP
6641 W. Broad Street
Richmond, VA 23230

August 5, 2026

To whom it may concern,

The Clarke County Sanitary Authority would like to register its strenuous opposition to Valley Link's proposed 765 kV transmission line through Clarke County. In our view this proposed transmission line route would pose an unreasonable risk to safety and viability of the Prospect Hill Spring and thus should be rejected.

The Clarke County Sanitary Authority (CCSA), an entity of the Clarke County Government, operates public water and sewer systems that serve the Town of Boyce, the villages of Millwood and White Post and commercial users at the Waterloo intersection (U.S. 50 and U.S. 340).

The Prospect Hill Spring is a massive natural spring that produces more than one million gallons of water per day. It is managed by the CCSA and is the sole source of drinking water provided to more than 400 households and businesses. The source of the spring water is a large aquifer arising from Clarke County's limestone Karst geology. The aquifer is formed by a ground water system of the Stonehenge and Conococheague limestone in around the Town of Boyce and the village of Millwood. The EPA recognized the importance and fragility of the Prospect Hill Spring Aquifer and, in 1987, pursuant to Section 1424(e) of the Safe Drinking Water Act, designated it a protected "sole and primary source of drinking water." (Federal Register Vol. 52 No. 110 June 9, 1987, page 21733). The EPA noted that the aquifer "if contaminated would create a significant hazard to public health." The protected Prospect Hill Aquifer includes the stream flow water source area of around 12 square miles. (See attached map.)

The proposed transmission line would cut through the middle of the EPA-designated aquifer with about 2.9 miles of transmission towers and lines. Construction of the massive towers would involve land and vegetation clearing and excavation for four support foundations up to 40 feet deep for each tower. As noted by the Virginia Department of Conservation and Recreation, "alterations to surface hydrology during agricultural, residential or industrial construction can cause the formation of sinkholes." Fractures to the limestone and encountering underground voids and springs in the construction of the tower pads can create sinkholes and other vectors of pollution of the protected aquifer. This could alter the quantity of water that the Prospect Hill Spring produces or render the water unsafe for human consumption. In 1991, the Clarke County Government limited a proposed subdivision in the Prospect Hill Spring Aquifer based in part based on its EPA designation.

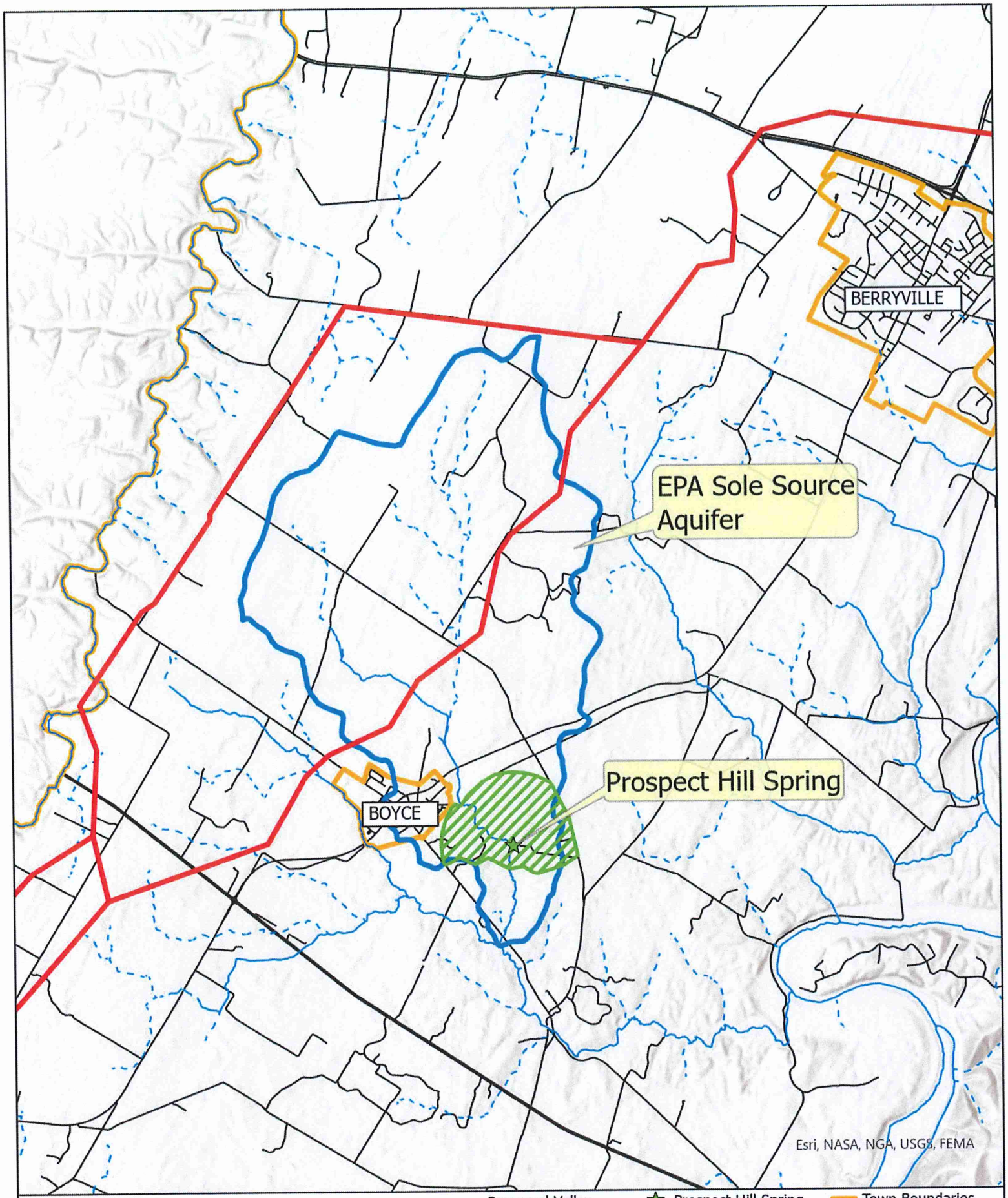
In order to protect safety of the drinking water of residents of Clarke County in the Prospect Hill Spring Aquifer, we urge Valley Link to abandon the proposed transmission line through our County.

Sincerely,

Roderick DeArment
Chair, Clarke County Sanitary Authority

CCSA Administration
P.O. Box 327
129 Ramsburg Lane
Berryville, VA 22611

540-955-5185
540-955-0456 (fax)



EPA Sole Source Aquifer - Prospect Hill Spring

Clarke County GIS
August 3, 2026

0.5 0.25 0 0.5 Miles

Proposed Valley North Transmission Lines

Prospect Hill Spring Sole Source Aquifer (EPA designated)

Prospect Hill Spring

Spring Conservation Overlay District

Town Boundaries

Roads

Perennial Streams

Intermittent Streams