

District 1: Mark Dotson
District 2: Steve Baker
District 3: David Ferguson
District 4: Kyle Gutshall
District 5: Dennis Morris
District 6: Tim Taylor



ADMINISTRATION
Evan L. Vass, County Administrator
Mandy R. Belyea, Deputy County Administrator

June 23, 2026

Tom Schultz
Chief
United States Forest Service
1400 Independence Ave, SW
Washington, DC 20250

RE: Comments on proposed rule to rescind the Roadless Rule and draft environmental impact statement, RIN 2025-16581.

Dear Chief Schultz:

Shenandoah County submits the following comments on the U.S. Forest Service's proposal to rescind the 2001 Roadless Area Conservation Rule ("Roadless Rule"). For twenty-five years, the Roadless Rule has protected the most natural, least developed areas of the national forests that frame Shenandoah County. These roadless areas provide vital benefits to our communities, including clean drinking water and outstanding outdoor recreation opportunities that power our local economy. Accordingly, we strongly urge the Forest Service to retain the Roadless Rule.

Virginia and the Shenandoah Valley have a deep, historic connection to the Roadless Rule; it was originally announced in 1999 from atop Reddish Knob in Augusta County overlooking the Little River Roadless Area. With nearly 400,000 roadless acres, Virginia holds more roadless acres than any other state east of the Mississippi River—nearly 250,000 of which sit in the nearby George Washington National Forest (GWNF). Shenandoah County is home to the Big Schloss roadless area and the Northern Massanutten roadless area.

Shenandoah County has long recognized that clean, safe drinking water is one of the primary benefits the GWNF provides to surrounding communities. In 2009 and 2010, the County passed resolutions calling on the U.S. Forest Service to "aggressively protect drinking water resources" from threatening management activities.¹ The Roadless Rule retains the single most effective way to safeguard downstream water supplies and rolling back this rule directly contradicts Shenandoah County's long-standing commitment to protecting our water.

¹ See attached Shenandoah County, *Resolution to the U.S. Forest Service on the George Washington National Forest Plan, Drinking Water Resource Management and Hydraulic Fracturing Natural Gas Mining* (Nov. 9, 2010).

Locally, the towns of Strasburg and Woodstock rely on surface intakes on the North Fork of the Shenandoah River for municipal drinking water. The Big Schloss roadless area protects streams that feed into the North Fork, as does the upstream Southern Massanutten roadless area in Page and Rockingham Counties. In fact, a recent U.S. Forest Service report confirms that smaller towns and rural areas with smaller upstream watersheds are the most vulnerable to water quality impacts and increased water treatment costs caused by land-use changes.²

Beyond water security, our roadless areas offer outdoor recreation opportunities for local families and visitors, which is an important economic driver in our region. They feature world-class resources alongside a rich heritage of backcountry hunting and fishing. Crucially, these areas protect vital wildlife habitats— sheltering Virginia’s premier native brook trout streams, which report the largest populations south of the Mason-Dixon line.³

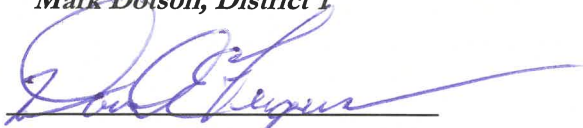
Ultimately, the Roadless Rule ensures balanced, responsible forest management while leaving the majority of our national forests available for other uses. Given the Forest Service’s existing maintenance backlogs, it would be fiscally irresponsible to build new roads that cannot be maintained, especially at the expense of irreplaceable backcountry areas and downstream impacts.

Shenandoah County deeply values and depends on these wild spaces. They ensure everyone can experience solitude and adventure for future generations and protect our cultural heritage. Because they support our economy and protect our water supply, we strongly urge the Forest Service to maintain current forest management standards and retain the Roadless Rule.

Thank you for the opportunity to comment. We welcome the opportunity to provide additional information or answer any questions you may have.



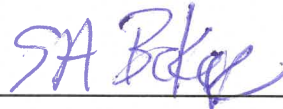
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David Ferguson, District 3



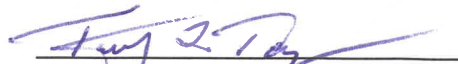
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² See U.S. Forest Service, Southern Research Station, *Benefits of Southern Forests for Drinking Water*, 45, 68-69 (Apr. 2026), available at <https://research.fs.usda.gov/download/treearch/80440.pdf>.

³ See Eastern Brook Trout Joint Venture, *Eastern Brook Trout—Status and threats: Eastern Brook Trout Joint Venture* <https://easternbrooktrout.org/science-data/reports/eastern-brook-trout-status-and-threats%20%282006%29>.

County of Shenandoah

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COUNTY ADMINISTRATOR

MARY T. PRICE
ASSISTANT COUNTY ADMINISTRATOR

Resolution to the U.S. Forest Service on the George Washington Natural Forest Plan, Drinking Water Resource Management and Hydraulic Fracturing Natural Gas Mining

WHEREAS, the U.S. Forest Service is preparing a draft forest plan and environmental impact statement for release in January 2011 that will govern management of resources within the George Washington National Forest (GWNF) for the next 15 years, and

WHEREAS, water sources within the GWNF serve an estimated 8,452 residents in the Shenandoah County towns of Strasburg and Woodstock, and

WHEREAS, the Shenandoah Board of Supervisors passed a resolution on May 12, 2009 calling on the U.S. Forest Service to provide comprehensive management and protection of drinking water resources in the Forest, and

WHEREAS, nearly all of the GWNF on the western border of Shenandoah County is underlain by the Marcellus shale geological formation, a potential source of natural gas that is mined by a drilling process known as hydraulic fracturing, and

WHEREAS, hydraulic fracturing requires from two to 10 million gallons of water per well, combined with sand and numerous chemicals, to break up shale and access natural gas, a drilling and mining process that has been linked to surface water and drinking water contamination, air pollution and soil contamination in a dozen states, and

WHEREAS, hydraulic fracturing gas mining has been linked to other significant adverse environmental impacts, including massive water withdrawals, gas migration from new and abandoned wells, the inability of public treatment plants to adequately treat millions of gallons of gas mining waste water, underground injection of brine waste water, improper erosion and sediment control, improper cementing and casing of wells, over-pressurized wells, significant increases in industrial truck traffic with subsequent increases in accidents on rural roads, and other accidents and spills, and

WHEREAS, Congress' 2005 Energy Policy Act exempts the hydraulic fracturing drilling process from long-held environmental regulations such as the Clean Air and Clean Water Acts, the Safe Drinking Water Act, the Superfund law and other environmental regulations, and

WHEREAS, the exact chemicals used in the hydraulic fracturing process are currently considered 'proprietary' and therefore are not disclosed to federal, state or local health officials or the public, and

WHEREAS, the U.S. Environmental Protection Agency is in the midst of a two-year study of effects of hydraulic fracturing gas mining on water quality and other resources, to inform the development of regulations and recommendations to reduce environmental impacts,

NOW, THEREFORE, BE IT RESOLVED that the Shenandoah Board of Supervisors requests that the U.S. Forest Service, in the revised management plan for the GWNF, act to aggressively protect drinking water resources, and prevent other significant environmental harm, by prohibiting hydraulic fracturing natural gas wells or mining in the National Forest.

Approved on a motion by Supervisor Helsley and seconded by Supervisor Morris and by a vote of 6-0 at a regularly scheduled meeting by the Shenandoah County Board of Supervisors on November 9, 2010.

ATTEST:



Clerk to the Board



Chairman of the Board of Supervisors

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OFFICE OF COUNTY ADMINISTRATION

VINCENT E. POLING
COUNTY ADMINISTRATOR

MARY T. PRICE
ASSISTANT COUNTY ADMINISTRATOR

RESOLUTION FOR DRINKING WATER RESOURCE MANAGEMENT GEORGE WASHINGTON FOREST MANAGEMENT PLAN

WHEREAS, the U.S. Forest Service is in the process of revising its 1993 Land and Resource Management Plan for the George Washington National Forest; and

WHEREAS, one of the six goals identified in the U.S. Forest Services' agency wide strategic plan is to "improve watershed condition"; and

WHEREAS, the availability of clean, safe drinking water is one of the primary benefits that the George Washington National Forest provides to the communities that surround it; and

WHEREAS, approximately 44 percent of the land in the George Washington National Forest lies within watersheds that make available public drinking water to more than 260,000 Virginia residents in 22 adjacent communities, by means of reservoirs and surface waters; and

WHEREAS, the watersheds of surface waters that flow from the George Washington National Forest into the North Fork of the Shenandoah River serve an estimated 8,452 residents in the Shenandoah County Towns of Strasburg and Woodstock; and

WHEREAS, there can be threats to water quality within the George Washington National Forest from ground disturbing activities, such as timber harvesting and road construction, which result in erosion and sedimentation if not properly managed by the Forest Service staff or contractors thereof; and

WHEREAS, the 1993 George Washington National Forest Management Plan provides for ground disturbing activities on most of the land (64 percent) in surface watersheds that provide drinking water through river intakes; and

NOW THEREFORE, be it resolved that the Shenandoah County Board of Supervisors supports the following actions to implement an objective as a part of the George Washington National Forest Management Plan to promote the quality and quantity of drinking water sources within the forest boundaries:

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- The U.S. Forest Service identify the watersheds serving the surface water resources within the George Washington National Forest that feed the North Fork of the Shenandoah River;
- The U.S. Forest Service establish management objectives that support the health of the drinking watershed and which encourage conditions within the watershed that maintain, protect and enhance drinking water quality;
- The U.S. Forest Service continue to permit ground disturbing activities in these areas; however, such activities shall be properly managed and controlled by the Forest Service to protect the health of the watershed;
- The U.S. Forest Service gather sufficient information to assess watershed conditions, develop a plan to systematically monitor water resources programs, and obtain data pertinent to water quality and watershed conditions, in cooperation with other agencies, organizations, local communities and volunteers;
- The U.S. Forest Service communicate in a timely manner with the localities that obtain drinking water from sources within the George Washington National Forest to ensure that the drinking watersheds are managed effectively, appropriately and for the public good;
- The U.S. Forest Service shall work with local communities, agencies and the larger public to establish policies and develop management plans for the drinking watersheds to properly maintain, protect and enhance drinking water quality.

BE IT FURTHER RESOLVED, that the Shenandoah County Board of Supervisors recommends that, the U.S. Forest Service retain all best management techniques and options in the approved Forest Management Plan that are necessary to protect the drinking water quality, and

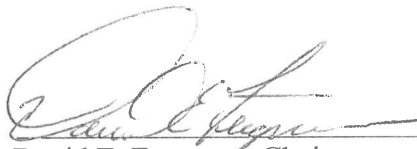
FURTHER, that the Shenandoah County Board of Supervisors recognizes that trail-based recreational activities in the George Washington National Forest are valuable and wholly compatible with water quality management.

Approved on a motion and second by Supervisors Helsley and Morris
and a 6-0 vote at the May 12, 2009 regular meeting of the Board of Supervisors.

Attest:



Vincent E. Poling, Clerk



David E. Ferguson, Chairman