



September 9, 2026

Ecosystem Management Coordination
Attn: Director
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124

RE: Comment on Draft EIS of the proposed rescission to the 2001 Roadless Area Conservation Rule – Docket No. FS-2025-0001 or RIN 0596-AD66

SENT VIA: Regular USPS Mail, and Electronically

Dear Director,

On behalf of the Walla Walla City Council, thank you for the opportunity to comment on the draft environmental impact statement (EIS) and rulemaking associated with the proposed rescission of the 2001 Roadless Area Conservation Rule and the management of inventoried roadless areas of National Forest Service lands. These comments supplement and reaffirm the City's previous letter dated September 10, 2025, in which we emphasized that the City is not supportive of rule changes that may negatively impact the City's drinking water source, the Mill Creek watershed.

The City of Walla Walla is located in eastern Washington State and sits at the base of the Blue Mountains of the Umatilla National Forest in southeast Washington and northeast Oregon. Within the Umatilla National Forest is the Mill Creek watershed, which flows into the Walla Walla River and ultimately the Columbia River.

The Mill Creek Watershed is a 36 square mile area at the upper end of the headwaters of Mill Creek and is the primary source of unfiltered drinking water for over 35,000 residents. The watershed is closed to the public and protected through a 1918 cooperative agreement between the City of Walla Walla and the United States Department of Agriculture. A majority of the Mill Creek Watershed lies within the area mapped as Inventoried Roadless Areas designated by the 2001 Roadless Rule. It is the City's continued interest in protecting the Mill Creek watershed as a precious source of high-quality drinking water for City residents.

The integrity of the City's drinking supply depends on the unconditional protection of the lands within the watershed. Maintaining the full 2001 Roadless Rule provides the greatest protection to effectively preserve this municipal water resource and ecological stability within the Mill Creek watershed as it limits road building, unfettered timber harvest, and activities that increase erosion, sediment delivery, and risk of downstream flooding. These negative impacts can lead to the introduction of contaminants, higher water turbidity, changes in peak flows, and the timing of spring runoff, all of which can unnecessarily increase water treatment costs. Such costs must be borne by City

residents, thereby affecting livelihoods and the wellbeing of our community. The EIS fails to address these social and economic impacts of those affected by foreseeable “downstream” impacts to municipal watersheds like the City of Walla Walla’s Mill Creek Watershed. Such impacts are not solely limited to watershed lands themselves, but the community “downstream” from these Inventoried Roadless Areas.

The City encourages the U.S. Department of Agriculture to further consider the adverse social, economic, and environmental impacts that rescinding the 2001 “Roadless Rule” may have on municipal watersheds, such as the City of Walla Walla’s, which provides clean, and reliable drinking water to our residents. To this end, the City of Walla Walla reaffirms that it is opposed to any rescission or change to the 2001 Roadless Area Conservation Rule.

As the City maintains an interest in this matter, we request that the City of Walla Walla be added to the interested party list and receive further notification of additional comment periods at the appropriate time.

Notification of future actions should be sent to the following mailing address:

City of Walla Walla
Attn: Elizabeth Chamberlain, City Manager
15 N. 3rd Avenue
Walla Walla, WA 99362

and by email to the following address: echamberlain@wallawallawa.gov

Thank you again for the opportunity to provide comments on this matter.

Sincerely,

Mayor Gustavo Reyna, on behalf of the Walla Walla City Council

Emily Brown
Rick Eskil
Steve Moss
Rodney Outlaw
Jeffrey Robinson
Monte Willis