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Comments: I really appreciate the opportunity to offer comments on the upcoming bonanza project. Timber supply for our mills have a great need for fiber and our forests desperately need fuel reduction so it's good to hear some management plans are on the horizon.

We appreciate the acknowledgment from the forest service of the need for a timber supply to the wood product manufactures in Montana. The forest service is well-aware of the mill closures across the state over the last 30 years and one common reason for closure is an inconsistent or unavailable wood supply - meanwhile; fire, disease, and insects are taking out far more of our forests than are being harvested. While the Bonanza project has a large footprint of 37,000 acres, only 1,980 are slated for commercial harvest. When contrasted with the rest of the castle mountains, this really is a small piece of the landscape, but a worthy goal for this project and hopefully a good start to more work in the region.

I haven't inspected portions of this project on the ground yet, but the EA does mention: "The lodgepole regeneration units were catastrophically impacted by mountain pine beetle between 2003 and 2013." And

"In the lodgepole pine dominated stands, mortality is at least 30 to 50 percent with many areas sustaining 70 to 90 percent mortality"

Unfortunately, while we have done our best over the last several years to utilize this expiring resource, it may be too far gone at this point. Depending on the circumstances a top quality sawlog or houselog could degrade less than firewood in 10 years.. some of this has died 20+ years ago so there may be merchantability issues with some of the material from this project. Hopefully sales from this project are designed with feasibility in mind, road construction costs are harder to recoup when dealing with smaller margins on the harvest. (This doesn't suggest a lack of support, the woods definitely need cleaned up but just putting the caution out there that some of these pieces may have passed their shelf-life.)

I also see some language that suggests temporary roads will be used meaning the road will be obliterated after use. I understand the forest service has road density rules, but I think the position of road deconstruction should change. We spend way too much time undoing work and removing infrastructure that could be used in future thinning projects, firefighting access, recreating, etc etc etc.. just leave it there and the grizzly and lynx will have more wide-level trails to walk on.

Operating seasons can be very limiting to the feasibility of a project as well. From a ground impact perspective, winter harvest is the best time to get work accomplished, so I hope sales will be designed to have the option to operate throughout the winter. Spring time in Montana can be productive, but it can change on a dime. Rather than a predefined operating season closing a block of time for spring breakup, sales should be setup so that the contractor has the option to operate as long as conditions allow, this can be negotiated with the sale administrator and the contractor as spring weather progresses.

Mid to late Summertime brings the risk of working restrictions like hoot-owl so the earlier a contractor can start on a project, the more work can be accomplished before those risks become reality.

Depending on the area, fall operations can be tricky to work cohesively with hunting season but as long as the forest service realizes that contractors need as much time at the job as possible that will make sales more feasible.

All in all, we're excited about the project, fully support its implementation and hope this marks the beginning of

more developments across the Helena National Forest, because it deserves the work, and mills need the fiber.