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Comments: In Section 3.1 of the Proposed Action Plan, the plan states that climate stressors decrease the ability of forests to regenerate. " Regeneration of trees is likely to be negatively affected by a number of factors exacerbated by climate change. A. Invasive species or plants. B. Drought, increase in deer browse, invasive herbaceous species, invasive earthworms." . The USFS has one history of a stand that did not meet regeneration requirements. The USFS extrapolates that even in the light of increased barriers from climate stressors their proposed silviculture practices have a high probability for regeneration over 15 years. How can the USFS predict the combined stressors of A and B which they already say will increase over time? How can they predict the combined effects of invasive earthworms, which are a fairly new invasive pest and not highly studied, and all the other climate stressors, which will also become more intensive over time? We already know that climate change is accelerating and will continue to do so. The criteria that has sufficed in the past to measure regeneration may have little or no value in the coming years.