

regulatory mechanisms to address those threats. This will be the starting point for any analysis we conduct which is to look at those main threats from the 2010 finding and determine if there has been any change in those threats now or will be into the foreseeable future. This analysis may include looking at actions already being conducted, or not, continuation of activities that were determined to be adverse, assessment of future actions around these principle threat areas into the future both from an adverse impact standpoint as well as an assessment of conservation actions (regulatory and non-regulatory) that have been developed to benefit the species. Additionally, there have been a number of other actions/activities that have been identified as either threats or conservation actions that the Service will need to evaluate to assess the overall conservation effect on the species, both positive and negative. However, this later analysis will likely be at a lower level of intensity and reduced level of effort on the part of Service staff.

Lastly, Changes in regulatory certainty and its relationship to ameliorating threats will be a critical element of our analysis. There will likely be two parts to this. The first will be quantifying, to the extent the data allows, regulatory actions that will be applied to the landscape in relation to implementation of regulatory planning documents, State plans, etc. directly related to the main threat factors. The same will need to be done for non-regulatory conservation actions. Second, the Service must evaluate the adequacy of the regulatory actions in terms of strength of the agency action, legal support etc. This second evaluation will likely occur later and will involve less quantitative methods but must be done in the context of the effect of plans and policies on abundance and distribution.

Changes in threats, conservation actions, and regulatory actions will be projected into the future using the analytical framework to provide a greater degree of resolution than was portrayed in the 2010 finding. This level of analysis will likely be at a greater level of detail than the most recent proposal on Bi-state. All of this will be cast in the form of abundance and distribution both now and into the future. The exact metric has yet to be developed but examples might be percent of populations persisting over time or percent distribution or possibly some index of habitat fragmentation in to the future. We do not recommend that the metric take the form of number of birds.

The Service has expressed both in writing and in numerous conversations that the COT report will be the lens for which we view the long-term persistence of the species. The COT report concluded several factors related to the long term conservation of the species. The COT report identified the most important geographies for the long-term persistence of the species. These have been identified as Primary Areas of Conservation, also known as PACs. These PACs have been identified by the participants of the COT as areas with the highest density of birds on the landscape with the range of the greater sage-grouse. Another factor identified on the COT report were discretely identifiable populations and the principle threats that might be acting on each of those populations that need to be ameliorated to ensure the long-term persistence of each population. The Service is proposing to utilize the COT report in establishing much of the baseline for the analytical framework to follow. The Service does anticipate utilizing the population densities within the PAC geographies and populations to evaluate current and future conditions for the species as well as looking at PAC areas or populations that have higher degree of population density and risk of threats to those areas.