

(or draft, if a final policy is not completed). Each of these will likely serve as discrete decision points in the process and will be completed at the appropriate times.

The final COT report provides detailed information regarding the major threats to the greater sage-grouse and provides information regarding the degree to which threats need to be addressed. This report has served as the basis for our evaluation of regulatory and voluntary planning efforts and will continue to serve as an evaluation tool to analyze the conservation measures during the status review. In addition, 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 within 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 intends to use the PACs and COT report in establishing much of the baseline for the analytical framework for the status review. The Service intends to use the population densities within the PACs and populations to evaluate current and future conditions for the species by evaluating the degree to which PACs or populations that have higher degree of population density are affected by or have some risk of threats to those areas.

The principle factors leading to the 2010 finding were habitat fragmentation, principally due to invasive species and fire, energy development and associated infrastructure, and sage brush conversion due agricultural practices, along with a lack of adequate regulatory mechanisms to address those threats. Other threats were identified, but were not identified as the primary threats. These primary threats will be the starting point for any analysis we conduct for the species status review. The Service will be quantifying, to the extent the data allows, the potential risk of these threats to PACs and populations with the greatest population density as well as the likely benefits of regulatory actions that will be applied to the landscape in relation to implementation of regulatory planning documents, State plans, etc. The degree and level of the quantitative analysis will be driven by the best available data. In instances where the data may not be available to quantify threats, we will use structured processes to evaluate and describe the potential impacts and species response in qualitative terms. We will evaluate non-regulatory conservation measures using a similar construct (where is it being applied, is it addressing threats identified in the COT report, etc.). Non-regulatory conservation actions will need to be categorized based on their certainty of implementation, for example legislative actions to guarantee funding for localized fire management while, not regulatory, provides a level of certainty that would be similar. Second, the Service must evaluate the adequacy of the all the actions in terms of effectiveness at addressing the threats to the species. The data call and Conservation Efforts Database (CED) will request information in a format to aid in this analysis. In addition, we plan to scale appropriate analysis to the suite of activities addressing the major threats and document in our record how these non-regulatory actions were evaluated and considered. The evaluation of the likely benefits of these actions will be analyzed in the context of the effect of these actions on abundance and distribution at different population scales. If the data is available through the data call or CED, this will have a quantitative