The Service reaffirmed the likelihood of these impacts by noting that, without "meaningful avoidance and minimization measures … the proposed Project may result in loss of habitat, individuals, and natural corridors that are utilized by this species."[238]

b. Frosted Flatwoods Salamander

The frosted flatwoods salamander depends upon small, isolated and ephemeral ponds. Undocumented in the applicant's surveys, Trail Ridge historically supported the species. Even if there are no salamanders on site, the degradation of wetlands could permanently preclude its potential recolonization. It could also result in the loss of breeding habitat for other extant amphibian populations that require similar habitat conditions.

c. Wood Stork

The large, long-legged wood stork is the only stork native to North America. As tactile feeders, wood storks wade in water with their beaks open and partially submerged. When a prey item is touched, the wood stork snaps its mandible shut and throws back its head to swallow the prey whole. This feeding technique allows storks to forage at all hours. Feeding success is largely dependent upon prey abundance and availability. Historically, water levels in the Southeast fluctuated with the seasons. Wet seasons would provide increased prey and dry seasons would concentrate that prey in easily accessible locations for wood storks. Because much of the Southeast has been diked, canalized and drained, however, the natural cycle that wood storks depend upon has been altered and their historical populations severely diminished. The species is now listed as Threatened under the ESA.

Because the Okefenokee remains functionally whole and largely intact, wood storks utilize the Refuge for foraging and nesting purposes. Unfortunately, the proposed mine potentially stands to alter the hydrological regime upon which the species relies. The Service "expect[s] impacts to ground water characteristics including water table elevation, and rate and direction of flow as the soil profile is permanently homogenized" within the refuge.[239] Should these impacts be realized, they "may not be able to be reversed," and could potentially have a major impact upon the ability of wood storks to locate prey.[240] It is well established that "storks are especially sensitive to any manipulation of a wetland site that results in either reduced amounts or changes in the timing of food availability."[241] A drop in the water table, furthermore, would not only affect prey availability, but it could prove fatal to breeding storks, which avoid predation by creating nests in flooded environments.[242]

The Service has also noted that, in addition to drainage and wetland alteration issues, one of the greatest threats facing the wood stork are the behavioral changes caused by human

[238] USFWS Letter 4.
[239] USFWS Letter at 3.
[240] *Id.* at 2.
[241] Ogden J. Habitat Management Guidelines for the Wood Stork in the Southeast Region. Everglades National Park, 4.
[242] *Id.* at 5