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Subject: Icon Apartment Homes at Dougherty Ranch (First Sufficiency Review) – Five Valleys Audubon Comment
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Our concern with the Icon Apartment Homes project is not with its scope and location. It's in an area where the community has expressed its wish to see future residential development and we expected that eventuality. Rather, we are concerned with the manner in which the project's impacts to wildlife and wildlife habitat were addressed in the application. Predicting the impact of an undertaking requires knowledge of what species tend to use an area being proposed for development. A report submitted along with the application contains site specific accounts of vegetation and wildlife found in the area. Yet, conclusions in the application regarding impacts on wildlife and wildlife habitat are not founded on that information. Rather, they are based on large-scale species inventories. Data from those inventories are not site-specific and pertain to critical species that might be found within a broad geographical area. By and large, they are of little value in describing wildlife use on a specific land area such as that being proposed for the Icon Apartment Homes development.

In addressing the impact of the development on the natural environment, the application concluded that *"There are minimal impacts to the natural environment because the site is currently vacant."* In reality, the development will have a substantive impact on year-round avian use of the site, particularly that of raptors. The proposed Icon Apartment Homes development would be located in an area that now exists as open space land and comprises habitat for meadow voles and Columbian ground squirrels. Both of these species are important prey for such raptors as American kestrels and red-tailed, Swainson's and rough-legged hawks. Since the proposed development will eliminate the prey species habitat, another increment of land needed by foraging raptors is lost. Responding to new human activity, raptors will doubtlessly seek prey on undeveloped habitat elsewhere and the impact may seem minor. Yet, when viewed in context with what is occurring in the Missoula Valley, the impact is consequential. It is a loss of land that adds to the slow and persistent shrinking of our remaining open space habitat.