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Resource Area	CEC Comment	Response
Biological Resources	Please identify project design features to avoid and minimize raven perching upon the parking structure.	The proposed parking structure would be an open-sided steel canopy covered by ASC Steel Deck B-36, 20-gauge preformed metal roof decking, rather than fabric, shade cloth, or photovoltaic panels (Genesis Parking Structure - spec.pdf; Desert Engineers 2025). The metal roof would be supported by steel columns, beams, and purlins. Common ravens (Corvus corax) may use human-made structures as elevated perching, feeding, roosting, or nesting sites. The locations on the parking structure most likely to provide attractive perches would include roof edges and corners, projecting beams or purlins, exposed beam flanges, column caps, light fixtures, signs, and similar features that provide stable landing surfaces and unobstructed views of the surrounding ground (BLM and USFS 2017; USFWS 2023). Raven use of these features could increase localized predation risk to juvenile desert tortoises and other small wildlife. Desert tortoise remains have been documented beneath raven nests and feeding perches, and ravens may also prey upon small reptiles, amphibians, mammals, and the eggs or young of birds (Peebles and Spencer 2020; USFWS 2023). The most likely area for prey remains to accumulate would be near the canopy perimeter and beneath discrete preferred perches. However, ravens could also use the central roof or interior framing if suitable landing or nesting locations remain available. The Project would establish a minimum 3-foot-wide deterrent-treatment band around the entire roof perimeter, measured horizontally inward from each exterior roof edge. The treatment band would include roof edges and corners, fascia, flashing, gutters, closure angles, projecting framing members, and other stable landing surfaces within or immediately adjoining the band. Prominent perching features outside this band would also be treated where they provide suitable landing surfaces or views of adjacent habitat. The 3-foot width is a project-specific design recommendation, not an agency-prescribed standard (as there are none to our knowledge), and may be adjusted during final design based on the selected deterrent system and structural configuration. Deterrents may include: •Low-profile electrified deterrent track along roof edges and other accessible perimeter landing surfaces; •Stainless-steel anti-perching devices sized for large birds on discrete features such as beam flanges, column caps, lights, signs, and equipment; •Tensioned stainless-steel bird wire on narrow or linear landing surfaces; and •Rigid metal mesh, sheet-metal closures, or end caps at sheltered framing intersections and other potential nesting pockets. Shock strips, spring-tensioned wires, and spike-type devices are recognized anti-perching options, but effectiveness depends on correct placement and continuing maintenance (BLM and USFS 2017; USDA APHIS 2022). Perch deterrents may reduce use without completely preventing it, and improperly configured spikes or wires may retain nesting material (Lammers and Collopy 2007; USFWS 2023). Flexible nylon or polypropylene bird netting would not be used because it can entrap birds; any exclusion mesh would be rigid, corrosion-resistant, and have openings no greater than 3/4 inch (USFWS 2024). Static visual deterrents, including plastic predators and reflective devices, would not be relied upon as permanent stand-alone measures because ravens may habituate to them.
Biological Resources	Please describe the anticipated effectiveness of proposed anti-perching features.	Avian deterrents can reduce raven use of specific structural surfaces, but they are not expected to completely prevent common ravens from landing on or using a structure. Ravens are adaptable, and published studies show that perch deterrents may reduce the probability or duration of perching while birds continue to use untreated portions of a structure or overcome deterrents where elevated alternatives are limited (Lammers and Collopy 2007; USFWS 2023). Device effectiveness also declines if components are damaged, obscured by debris, inadequately maintained, or arranged in a manner that retains nesting material (Peebles and Spencer 2020; USDA APHIS 2022). The proposed design would combine a minimum 3-foot-wide treatment band around the roof perimeter with treatment of prominent perches elsewhere on the structure and physical closure of potential nesting pockets. The 3-foot width is a project-specific design recommendation, that addressed the danger zone (i.e., the area that ravens could perch and look downward for prey). The proposed system is expected to meaningfully reduce routine perching, prey handling, roosting, and nest establishment on treated surfaces because it would target roof edges, corners, projecting framing, column caps, fixtures, and sheltered nesting locations rather than relying on visual scare devices alone.