

**MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT**  
**For Harbison Canyon Drive**  
**PDS2022-TPM-21316**  
**APN(s) 513-101-11-00**

**March 18, 2026**

**I. Introduction**

The project proposes to subdivide the 12.37-acre project site into 4 single family residential lots, with a remainder lot. The project site is located at 2030 Harbison Canyon Road in the Crest-Dehesa Community Planning Area. Access would be provided by the new private street connecting to Harbison Canyon Road to the east. The project is also located within the Metro-Lakeside-Jamul segment of the County’s Multiple Species Conservation Program (MSCP).

Biological resources on the site were evaluated in a Biological Resources Letter Report (Vince Scheidt, July 2025). The site contains 0.1 acre disturbed coastal sage scrub, 0.2 coastal sage-chaparral scrub, 8.4 acres of non-native grassland, 0.29-acre southern coast live oak riparian forest, 0.3-acre non-native vegetation, and 3.0 acre disturbed/developed habitat. Sensitive wildlife species identified onsite include orange-throated whiptail (*Aspidoscelis hyperythrus beldingi*) and red-shouldered hawk (*Buteo lineatus*). Sensitive plant species identified onsite include Campo Clarkia (*Clarkia delicata*) and San Diego County viguiera (*Bahiopsis laciniata*). As a result of this project, impacts will occur to 0.1 acre disturbed coastal sage scrub, 0.2-acre coastal sage-chaparral scrub, 8.0 acres of non-native grassland (0.4 acre considered impact neutral), 0.29 acre southern coast live oak riparian forest, 0.3 acre non-native vegetation, and 3.0 acres disturbed/developed habitat; habitat for red-shouldered hawk and orange-throated whiptail; and two individual San Diego County viguiera and campo clarkia.

Impacts to sensitive biological resources will require mitigation. Mitigation will include purchase of credits at a mitigation bank and breeding season avoidance.

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation
Disturbed Coastal Sage Scrub	II	0.1	0.1	1:1	0.1
Coastal Sage-Chaparral Scrub	II	0.2	0.2	1:1	0.2
Non-Native Grassland	III	8.4	8.0*	0.5:1	4.0
Southern Coast Live Oak Riparian Forest	I	0.29	0.29	1:1	0.29
Non-Native Vegetation	IV	0.3	0.3	--	--
Disturbed/Developed	IV	3.0	3.0	--	--
<b>Total:</b>	--	12.29	12.29	--	4.59

\*Acreages within 100 feet of existing onsite and offsite habitable structures are considered impact neutral.

The findings contained within this document are based on County records and the Biological Resource Letter Report (Vince Scheidt, July 2025). The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Wildlife and the US Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

## **II. Biological Resource Core Area Determination**

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

### **A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within which project-related disturbance is proposed, including any on and/or off-site impacts.**

The Impact Area does not qualify as a BRCA since it does not meet any of the following BRCA criteria:

#### **i. The land is shown as Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map.**

The land is not shown as Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map. Therefore, this criterion does not apply.

#### **ii. The land is located within an area of habitat that contains biological resources that support or contribute to the long-term survival of sensitive species and is adjacent or contiguous to preserved habitat that is within the Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map.**

While the land is located within an area of habitat that is suitable for wildlife, it does not support or contribute to the long-term survival of sensitive species, nor is it within or adjacent to preserved habitat within the Pre-Approved Mitigation Area. Therefore, this criterion does not apply.

- iii. The land is part of a regional linkage/corridor. A regional linkage/corridor is either:**
- a. Land that contains topography that serves to allow for the movement of all sizes of wildlife, including large animals on a regional scale; and contains adequate vegetation cover providing visual continuity so as to encourage the use of the corridor by wildlife; or**
  - b. Land that has been identified as the primary linkage/corridor between the northern and southern regional populations of the California gnatcatcher in the population viability analysis for the California gnatcatcher, MSCP Resource Document Volume II, Appendix A-7 (Attachment I of the BMO.)**

The land has not been identified as a regional linkage/corridor. The project site contains existing single-family homes and is surrounded by existing residential development. There are preserved lands to the north, west, and east that allow for the movement of wildlife. Therefore, this criterion does not apply.

- iv. The land is shown on the Habitat Evaluation Map (Attachment J to the BMO) as very high or high and links significant blocks of habitat, except that land which is isolated or links small, isolated patches of habitat and land that has been affected by existing development to create adverse edge effects shall not qualify as BRCA.**

The land is shown as Developed on the Habitat Evaluation Map and does not link significant blocks of habitat. Therefore, this criterion does not apply.

- v. The land consists of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat that contributes to the conservation of sensitive species.**

The land does not consist of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat. The site is currently partially developed with existing single-family residences and is surrounded by existing residential development. There are preserved lands to the north, west, and east that contribute to the conservation of sensitive species. Therefore, this criterion does not apply.

- vi. The land contains a high number of sensitive species and is adjacent or contiguous to surrounding undisturbed habitats, or contains soil derived from the following geologic formations which are known to support sensitive species:**
- a. Gabbroic rock;**
  - b. Metavolcanic rock;**
  - c. Clay;**
  - d. Coastal sandstone**

The land does not contain a high number of sensitive species, nor is it adjacent or contiguous to surrounding undisturbed habitats. Available data indicates that the project site contains Placentia sandy loam, Fallbrook sandy loam, and Visalia sandy loam. These soils are not known to contain a high number of sensitive species. Therefore, this criterion does not apply.

**B. Report the factual determination as to whether the Mitigation Site qualifies as a BRCA.**

Mitigation will occur through the purchase of mitigation credits at an offsite mitigation bank located within a BRCA in the MSCP.

**III. Biological Mitigation Ordinance Findings**

**A. Project Design Criteria (Section 86.505(a))**

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or proposes impacts within a Biological Resource Core Area.

**1. Project development shall be sited in areas to minimize impact to habitat.**

The project site was determined to not be appropriate for onsite preservation or avoidance due to the existing development onsite and surrounding the site. Therefore, the site is more suitable for development with mitigation in the form of purchasing mitigation credits at a County approved mitigation bank within a BRCA in the MSCP.

**2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance.**

The project site was determined to not be appropriate for onsite preservation or avoidance due to the existing development onsite and surrounding the site. Therefore, clustering as a means of achieving avoidance is not necessary.

**3. Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.**

Steep slopes are not located on the property. Therefore, encroachment into steep slopes is not applicable.

**4. The County shall consider a reduction in road standards to the maximum extent consistent with public safety considerations.**

Minimum private road standards have been applied to the onsite proposed private roads. No reduction in road standards are necessary.

- 5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).**

The project complies with applicable design criteria in the County MSCP Subarea Plan (Attachment G and H) as discussed below.

#### **B. Preserve Design Criteria (Attachment G)**

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

The project is not located within a Pre-Approved Mitigation Area or areas designated as Preserve land. Therefore, the Preserve Design Criteria from Attachment G does not apply.

#### **C. Design Criteria for Linkages and Corridors (Attachment H)**

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

The project site is not located within a regional linkage or corridor. Therefore, the Design Criteria for Linkages and Corridors from Attachment H does not apply.

### **IV. Subarea Plan Findings**

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

- 1. The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.**

The project site does not contain any wetlands under federal, state, or county jurisdiction. Therefore, this criterion does not apply.

- 2. The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.**

The project site does not support any unique habitat or habitat features. The site is partially developed with existing single-family homes and is surrounded by existing

residences. Mitigation for impacts to vegetation will occur through the purchase of mitigation credits at a County approved mitigation bank within a BRCA in the MSCP.

- 3. The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.**

The project site does not contain extensive patches of coastal sage scrub or other habitat types that are ranked as having high and very high biological values by the Habitat Evaluation Model. The site contains 0.1 acre of coastal sage scrub and 0.2-acre coastal sage-chaparral habitat that is mapped as developed by the Habitat Evaluation Map. Therefore, the site is more suitable for development with mitigation in the form of purchasing mitigation credits at a County approved mitigation bank within a BRCA in the MSCP. Offsite mitigation purchase will contribute towards maximizing diversity by preserving habitat in areas known to have unique habitats and habitat features.

- 4. The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.**

As the site is partially developed with existing single-family homes and is surrounded by existing residential development, it is not desirable to create a significant block of habitat through onsite preservation. Impacts to onsite habitat will be mitigated through offsite purchase. Offsite mitigation will contribute toward creating large blocks of high-quality habitats where edge effects are minimal and the land is protected in perpetuity.

- 5. The project provides for the development of the least sensitive habitat areas.**

The project site was determined to not be appropriate for onsite preservation due to the existing development onsite and surrounding the site. Mitigation for impacts will occur through offsite preservation within a BRCA in the MSCP.

- 6. The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.**

No threatened, endangered, narrow endemic species were detected on the project site. Developing the site will not eliminate highly sensitive habitat or impact key populations of covered species.

- 7. Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.**

The site is not located adjacent to any known golden eagle nest sites or within known eagle foraging habitat. No wide-ranging species are expected to occur onsite due to adjacent development and surrounding land uses. Offsite purchase and preservation of high-quality habitat to mitigate for impacts will occur within a BRCA in the MSCP. This will contribute to the development of large interconnecting blocks of habitat that support wide ranging species.

- 8. All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.**

No critical or narrow endemic species were detected on the site. Most sensitive species have a low potential to be present due to the existence of development onsite and offsite.

- 9. No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.**

The project site is not within an area of regional significance with regard to conservation of sensitive species and habitats. The site is not part of or adjacent to large interconnecting blocks of habitat, lands identified as PAMA or Preserve, or other sensitive resources. The surrounding development does not aid in conservation or wildlife dispersal. Therefore, developing the site will not hinder possible preserve systems.

- 10. All projects that propose to count on-site preservation toward their mitigation responsibility must include provisions to reduce edge effects.**

The project does not propose any onsite preservation.

- 11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.**

The project site does not qualify as a Biological Resources Core Area. No threatened, endangered, or narrow endemic species were detected on the project site. Due to the existing development onsite and surrounding the site, the project site is suitable for development with the incorporation of mitigation measures. Mitigation measures will include the offsite preservation of habitat within a BRCA in the MSCP. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined by the BMO.

