Exhibit N

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From: Tyler Rogers, Project Manager
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Date: January 14, 2026

Re: Val Verde Drive Project LESA Model Memorandum

City Ventures requested that David J. Powers & Associates, Inc. (DJP&A) complete a Land Evaluation and Site Assessment (LESA) model run of the proposed Carmel Rio Road project to identify potential agricultural impacts under the California Environmental Quality Act (CEQA). Our understanding of the project and the results of the LESA model run are summarized below. The information in this memorandum is based on our professional opinion. We acknowledge the determination of the project's environmental impacts are that of Monterey County as the Lead Agency, based upon substantial evidence.

Project Understanding

The project site totals approximately 12.5 acres located at 26500 Val Verde Drive (APNs: 015-021-004-000, 015-021-015-000, 015-021-020-000, 015-021-021-000, 015-021-049-000), within unincorporated Monterey County. The project site has historically been used for agricultural purposes. Approximately 10 acres of the 12.5-acre project site are currently used for row crop agriculture producing strawberries, melons, artichokes, squash, pumpkins, fennel, fava beans, zucchini, radishes, and flowers. The remaining 2.5 acres, located along the southern portion of the site, are developed with an existing single family residence and a detached garage.

The project proposes to demolish the existing residence and detached garage and subdivide the project site into 60 lots in order to construct 74 residential units. Lots 1 – 59 would be developed with for-sale single family residences. The remaining 0.82-acre lot (Lot 60) would be developed with three individual townhomes, each with five two-bedroom units that would allow for 15 deed restricted affordable housing units. Access would be provided by the existing Val Verde Drive and an internal circulation network of two private streets, sidewalks, crosswalks, and medians. The project would include both private open space (i.e., rear yard areas for single family residences and flexible green space for the townhomes), and approximately 73,356 square feet of community open space and parks.

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LESA Model Results

Per the California Department of Conservation Farmland Mapping and Monitoring Program, portions of the project site are designated as Prime Farmland.[1] The project site is not under a Williamson Act contract. Development of the proposed project would result in the conversion of designated agricultural land to non-agricultural uses.

DJP&A completed an assessment of the project site using the LESA model[2] to determine if the replacement of designated agricultural land with the proposed project would result in a significant agricultural resources impact. LESA scores range from zero to 100, with scores between zero and 39 points assumed to have no significant impact, 80 and above considered to have a significant impact, and scores between 40 and 79 points to be potentially significant depending on individual subscores within the LESA model. The project's LESA score was 68.5 (see attached LESA model sheets). LESA scores between 60 and 79 points would result in a significant agricultural resources impact, unless either the Land Evaluation (LE) subscore or Site Assessment (SA) subscore is less than 20 points. The project's LE subscore is 49.75, primarily due to the project site's soil quality for agricultural uses. The project's SA subscore, however, is 18.75, primarily due to the lack of surrounding agricultural and protected resource land (see Figure 1 below and page 8-A in attached LESA Model Sheets). Thus, because the project's SA subscore is below 20 points, it is determined that the project would have a less than significant impact on agricultural resources.

[1] California Department of Conservation. "California Important Farmland Finder." Accessed January 8, 2026. https://maps.conservation.ca.gov/DLRP/CIFF/.

[2] The California LESA Model was developed to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process.

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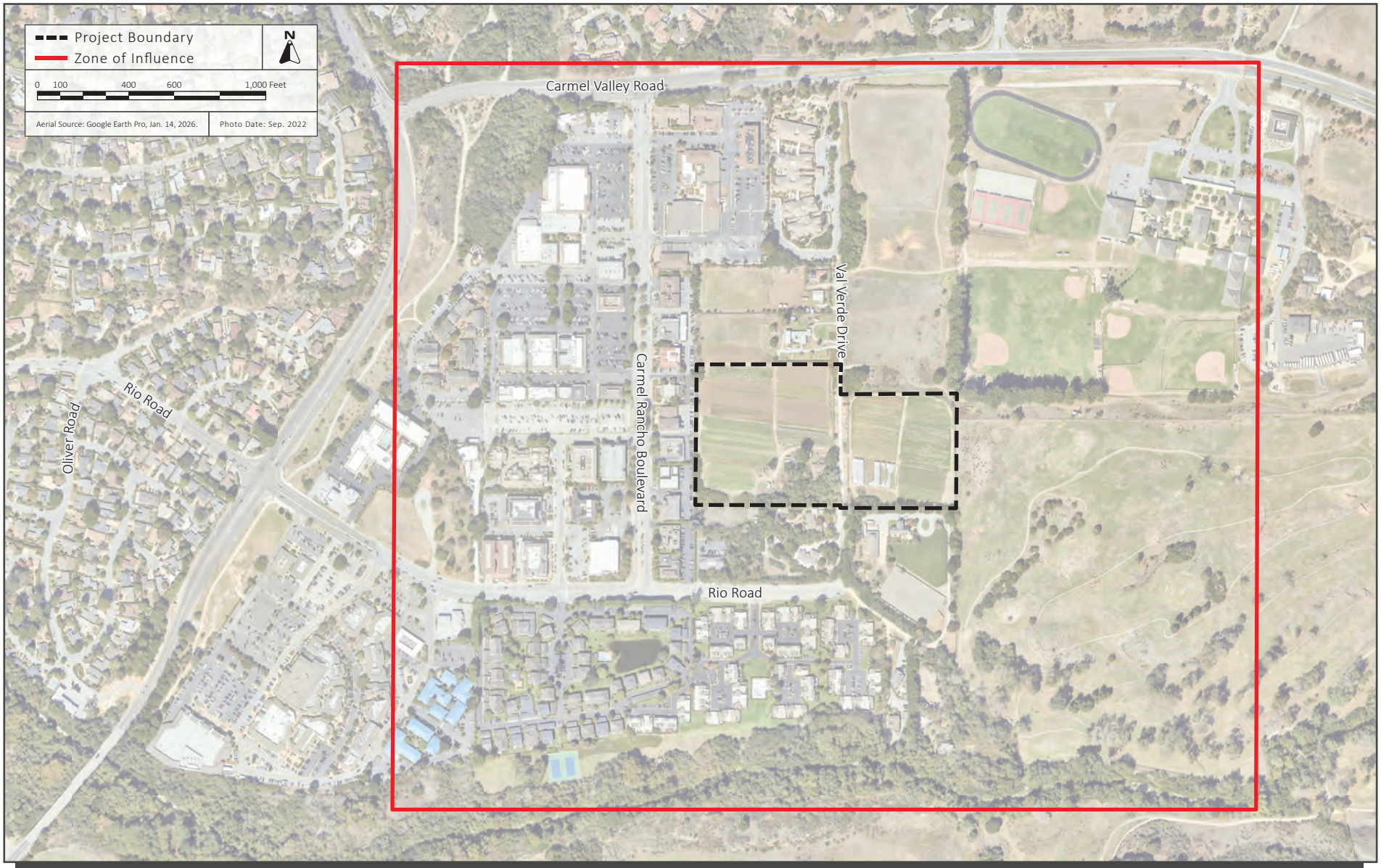

LESA MODEL ZONE OF INFLUENCE

FIGURE 1

LESA Model Sheets

Appendix A. California Agricultural LESA Worksheets

NOTES

Calculation of the Land Evaluation (LE) Score

Part 1. Land Capability Classification (LCC) Score:

(1) Determine the total acreage of the project.
(2) Determine the soil types within the project area and enter them in **Column A** of the **Land Evaluation Worksheet** provided on page 2-A.
(3) Calculate the total acres of each soil type and enter the amounts in **Column B**.
(4) Divide the acres of each soil type (**Column B**) by the total acreage to determine the proportion of each soil type present. Enter the proportion of each soil type in **Column C**.
(5) Determine the LCC for each soil type from the applicable Soil Survey and enter it in **Column D**.
(6) From the LCC Scoring Table below, determine the point rating corresponding to the LCC for each soil type and enter it in **Column E**.

LCC Scoring Table

LCC Class	I	IIe	IIs,w	IIIe	IIIs,w	IVe	IVs,w	V	VI	VII	VIII
Points	100	90	80	70	60	50	40	30	20	10	0

(7) Multiply the proportion of each soil type (**Column C**) by the point score (**Column E**) and enter the resulting scores in **Column F**.
(8) Sum the LCC scores in **Column F**.
(9) Enter the LCC score in box <1> of the **Final LESA Score Sheet** on page 10-A.

Part 2. Storie Index Score:

(1) Determine the Storie Index rating for each soil type and enter it in **Column G**.
(2) Multiply the proportion of each soil type (**Column C**) by the Storie Index rating (**Column G**) and enter the scores in **Column H**.
(3) Sum the Storie Index scores in **Column H** to gain the Storie Index Score.
(4) Enter the Storie Index Score in box <2> of the **Final LESA Score Sheet** on page 10-A.

Land Evaluation Worksheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
Pf	12.5	1.0	I	100	100	99	99
Totals	12.5	(Must Sum to 1.0)		***LCC Total Score***	100	***Storie Index Total Score***	99

Site Assessment Worksheet 1.

Project Size Score

	I	J	K
	LCC Class I - II	LCC Class III	LCC Class IV - VIII
	12.5	0	0
Total Acres	12.5	0	0
Project Size Scores	30		

Highest Project Size Score 30

NOTES

Calculation of the Site Assessment (SA) Score

Part 1. Project Size Score:.

(1) Using **Site Assessment Worksheet 1** provided on page 2-A, enter the acreage of each soil type from **Column B** in the **Column - I, J or K** - that corresponds to the LCC for that soil. (Note: While the Project Size Score is a component of the Site Assessment calculations, the score sheet is an extension of data collected in the Land Evaluation Worksheet, and is therefore displayed beside it).
(2) Sum **Column I** to determine the total amount of class I and II soils on the project site.
(3) Sum **Column J** to determine the total amount of class III soils on the project site.
(4) Sum **Column K** to determine the total amount of class IV and lower soils on the project site.
(5) Compare the total score for each LCC group in the Project Size Scoring Table below and determine which group receives the highest score.

Project Size Scoring Table

Class I or II		**Class III**		**Class IV or Lower**	
Acreage	Points	Acreage	Points	Acreage	Points
>80	100	>160	100	>320	100
60-79	90	120-159	90	240-319	80
40-59	80	80-119	80	160-239	60
20-39	50	60-79	70	100-159	40
10-19	30	40-59	60	40-99	20
10<	0	20-39	30	40<	0
		10-19	10		
		10<	0		

(6) Enter the **Project Size Score** (the highest score from the three LCC categories) in box <3> of the **Final LESA Score Sheet** on page 10-A.

NOTES

Part 2. Water Resource Availability Score:

(1) Determine the type(s) of irrigation present on the project site, including a determination of whether there is dryland agricultural activity as well.

(2) Divide the site into portions according to the type or types of irrigation or dryland cropping that is available in each portion. Enter this information in **Column B** of **Site Assessment Worksheet 2. - Water Resources Availability**.

(3) Determine the proportion of the total site represented for each portion identified, and enter this information in **Column C**.

(4) Using the Water Resources Availability Scoring Table, identify the option that is most applicable for each portion, based upon the feasibility of irrigation in drought and non-drought years, and whether physical or economic restrictions are likely to exist. Enter the applicable Water Resource Availability Score into **Column D**.

(5) Multiply the Water Resource Availability Score for each portion by the proportion of the project area it represents to determine the weighted score for each portion in **Column E**.

(6) Sum the scores for all portions to determine the project's total Water Resources Availability Score

(7) Enter the Water Resource Availability Score in box <4> of the **Final LESA Score Sheet** on page 10-A.

Site Assessment Worksheet 2. - Water Resources Availability

A	B	C	D	E
Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Availability Score (C x D)
1	Irrigated agriculture	1.0	95	95
2				
3				
4				
5				
6				
		(Must Sum to 1.0)	***Total Water Resource Score***	95

Water Resource Availability Scoring Table

Option	Non-Drought Years			Drought Years			WATER RESOURCE SCORE
	RESTRICTIONS			RESTRICTIONS			
	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	Irrigated Production Feasible?	Physical Restrictions ?	Economic Restrictions ?	
1	YES	NO	NO	YES	NO	NO	100
2	YES	NO	NO	YES	NO	YES	95
3	YES	NO	YES	YES	NO	YES	90
4	YES	NO	NO	YES	YES	NO	85
5	YES	NO	NO	YES	YES	YES	80
6	YES	YES	NO	YES	YES	NO	75
7	YES	YES	YES	YES	YES	YES	65
8	YES	NO	NO	NO	-- --	-- --	50
9	YES	NO	YES	NO	-- --	-- --	45
10	YES	YES	NO	NO	-- --	-- --	35
11	YES	YES	YES	NO	-- --	-- --	30
12	Irrigated production not feasible, but rainfall adequate for dryland production in both drought and non-drought years						25
13	Irrigated production not feasible, but rainfall adequate for dryland production in non-drought years (but not in drought years)						20
14	Neither irrigated nor dryland production feasible						0

NOTES

Part 3. Surrounding Agricultural Land Use Score:

(1) Calculate the project's Zone of Influence (ZOI) as follows:
(a) a rectangle is drawn around the project such that the rectangle is the smallest that can completely encompass the project area.
(b) a second rectangle is then drawn which extends one quarter mile on all sides beyond the first rectangle.
(c) The ZOI includes all parcels that are contained within or are intersected by the second rectangle, less the area of the project itself.
(2) Sum the area of all parcels to determine the total acreage of the ZOI.
(3) Determine which parcels are in agricultural use and sum the areas of these parcels
(4) Divide the area in agriculture found in step (3) by the total area of the ZOI found in step (2) to determine the percent of the ZOI that is in agricultural use.
(5) Determine the Surrounding Agricultural Land Score utilizing the Surrounding Agricultural Land Scoring Table below.

Surrounding Agricultural Land Scoring Table

Percent of ZOI in Agriculture	Surrounding Agricultural Land Score
90-100	100
80-89	90
75-79	80
70-74	70
65-69	60
60-64	50
55-59	40
50-54	30
45-49	20
40-44	10
<40	0

(5) Enter the Surrounding Agricultural Land Score in box <5> of the **Final LESA Score Sheet** on page 10-A.

Site Assessment Worksheet 3.
Surrounding Agricultural Land and Surrounding Protected Resource Land

A	B	C	D	E	F	G
Zone of Influence						
Total Acres	Acres in Agriculture	Acres of Protected Resource Land	Percent in Agriculture (A/B)	Percent Protected Resource Land (A/C)	Surrounding Agricultural Land Score (From Table)	Surrounding Protected Resource Land Score (From Table)
521.9	14.61	198	2.8%	37.9%	0	0

NOTES

Part 4. Protected Resource Lands Score:

The Protected Resource Lands scoring relies upon the same Zone of Influence information gathered in Part 3, and figures are entered in Site Assessment Worksheet 3, which combines the surrounding agricultural and protected lands calculations.

(1) Use the total area of the ZOI calculated in Part 3. for the Surrounding Agricultural Land Use score.
(2) Sum the area of those parcels within the ZOI that are protected resource lands, as defined in the California Agricultural LESA Guidelines.
(3) Divide the area that is determined to be protected in Step (2) by the total acreage of the ZOI to determine the percentage of the surrounding area that is under resource protection.
(4) Determine the Surrounding Protected Resource Land Score utilizing the Surrounding Protected Resource Land Scoring Table below.

Surrounding Protected Resource Land Scoring Table

Percent of ZOI Protected	Protected Resource Land Score
90-100	100
80-89	90
75-79	80
70-74	70
65-69	60
60-64	50
55-59	40
50-54	30
45-49	20
40-44	10
<40	0

(5) Enter the Protected Resource Land score in box <6> of the **Final LESA Score Sheet** on page 10-A.

LESA Worksheet (cont.)

NOTES

Final LESA Score Sheet

Calculation of the Final LESA Score:

(1) Multiply each factor score by the factor weight to determine the weighted score and enter in Weighted Factor Scores column.
(2) Sum the weighted factor scores for the LE factors to determine the total LE score for the project.
(3) Sum the weighted factor scores for the SA factors to determine the total SA score for the project.
(4) Sum the total LE and SA scores to determine the Final LESA Score for the project.

	Factor Scores	Factor Weight	Weighted Factor Scores
LE Factors			
Land Capability Classification	*<1>* 100	0.25	25
Storie Index	*<2>* 99	0.25	24.75
LE Subtotal		***0.50***	49.75
SA Factors			
Project Size	*<3>* 30	0.15	4.5
Water Resource Availability	*<4>* 95	0.15	14.25
Surrounding Agricultural Land	*<5>* 0	0.15	0
Protected Resource Land	*<6>* 0	0.05	0
SA Subtotal		***0.50***	18.75
		Final LESA Score	68.5

For further information on the scoring thresholds under the California Agricultural LESA Model, consult Section 4 of the Instruction Manual.

California Agricultural LESA Scoring Thresholds - Making Determinations of Significance Under CEQA

A single LESA score is generated for a given project after all of the individual Land Evaluation and Site Assessment factors have been scored and weighted as detailed in Sections 2 and 3. Just as with the scoring of individual factors that comprise the California Agricultural LESA Model, final project scoring is based on a scale of 100 points, with a given project being capable of deriving a maximum of 50 points from the Land Evaluation factors and 50 points from the Site Assessment factors.

The California Agricultural LESA Model is designed to make determinations of the potential significance of a project's conversion of agricultural lands during the Initial Study phase of the CEQA review process. Scoring thresholds are based upon both the total LESA score as well as the component LE and SA subscores. In this manner the scoring thresholds are dependent upon the attainment of a minimum score for the LE and SA subscores so that a single threshold is not the result of heavily skewed subscores (i.e., a site with a very high LE score, but a very low SA score, or vice versa). Table 9 presents the California Agricultural LESA scoring thresholds.

California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39 Points	Not Considered Significant
40 to 59 Points	Considered Significant only if LE and SA subscores are each greater than or equal to 20 points
60 to 79 Points	Considered Significant unless either LE or SA subscore is less than 20 points
80 to 100 Points	Considered Significant

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