Attachment M

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Introduction - Light Commercial Zones.

Multiple studies and industry reports provide insights into the sizes of commercial centers in the United States. Towns and villages often have populations under 5,000, as noted in US Census Bureau analyses, which influences the scale of such centers. Key sources include classifications from the International Council of Shopping Centers (ICSC) and historical planning reports from the American Planning Association (APA).

These typically express sizes in gross leasable area (GLA) in square feet, land area in acres, and trade area population or radius. Below are findings on actual and recommended/ideal sizes, including estimates in acres per 1,000 inhabitants where available.

National Results.

Data on actual sizes are derived from surveys of existing developments, often aggregated at a national or regional level rather than isolated to rural areas. The ICSC's U.S. Shopping Center Classification (2017, with ongoing relevance) categorizes smaller centers as follows, based on a survey of over 115,000 centers nationwide:

- Convenience/Strip Centers: These are the smallest, typically serving immediate local needs (e.g., gas stations, small stores). Average GLA: 13,218 square feet; typical range: under 30,000 square feet; land area: *under 3 acres.* Trade area: less than 1 mile, often *supporting populations of 1,000 – 5,000 in low-density areas.*

- Neighborhood Centers: Common in small towns, anchored by a supermarket or similar. Average GLA: 71,827 square feet; typical range: 30,000 – 125,000 square feet; *land area: 3 – 5 acres*. Trade area: 3 miles, *typically supporting 15,000–20,000 people* (based on 6,000–8,000 households at 2.5 persons per household).

A 1952 APA report on market analysis for shopping centers provides historical context, noting neighborhood centers in smaller communities served 1,000–4,000 families (approximately 2,500 – 10,000 people) within a 2/3-mile diameter area, with *GLA ranging from 2.9 to 37.6 square feet per person.*

More recent U.S. Energy Information Administration data (2012) indicate the average commercial building size in rural areas is around 16,300–19,000 square feet, though this is per building and not per center. Nationally, the U.S. has about 24 square feet of shopping center GLA per capita, but this includes larger urban malls and is lower in rural areas (e.g., *10 – 15 square feet per capita in small towns*, based on trade area extrapolations).

In terms of land area per 1,000 inhabitants: for a neighborhood center serving 15,000 – 20,000 people on 3–5 acres, this equates to approximately 0.15 – 0.33 acres per 1,000 inhabitants (calculated as total acres divided by population in thousands).

Recommendations emphasize sustainability, fiscal impact, and alignment with population density, as outlined in planning guidelines. The ICSC classifications serve as de facto standards for ideal sizes, promoting efficient land use:

- *Convenience/Strip Centers: Ideal for villages under 5,000 people; recommended land area under 3 acres for trade areas of 1,000 – 5,000 people (approximately 0.6 – 3 acres per 1,000 inhabitants).*

- *Neighborhood Centers: Suitable for small towns of 5,000–20,000; recommended 3 – 5 acres for 15,000–20,000 people (0.15 – 0.33 acres per 1,000 inhabitants). GLA should be 4 – 6 square feet per person to avoid overbuilding.*

The APA's 1952 report suggests an *ideal GLA of 20 – 30 square feet per person for neighborhood centers in low-density areas, translating to 3 – 10 acres total (including parking at 40% site coverage) for 5,000 – 10,000 people (0.3 – 2 acres per 1,000 inhabitants).*

U.S. Environmental Protection Agency guidelines for rural smart growth recommend clustering commercial development in existing town centers or hamlets, without specific per capita metrics, to preserve rural character and limit sprawl to nodes rather than highways.

Local Results - Table 1.

See Appendix 1 for Monterey County GIS maps of each location.

Location	LC, Acres (~sqft)^	Population, CDP 2020 Census	LC Acres / 1,000 Residents	Normalized* LC Range, Acres	Notes
Bradley	2.6 (114,000)	69	37.7	0.04-0.21	LC is over 10X bigger than the nationwide largest average area of 3 / 1,000
Lockwood	142 (6,180,000)	368	385.9	0.22-1.10	LC is over 125X bigger than the nationwide largest average area of 3 / 1,000
Pleyto	139 (6,050,000)	150	926.7	0.09-0.45	LC is over 300X bigger than the nationwide largest average area of 3 / 1,000. Pleyto pop. estimated, has not been on Census since 1965 when the village was flooded by nearby lake
San Ardo	0.6 (28,000)	392	1.5	0.24-1.18	LC is approx. 0.5X the size of the nationwide largest average area of 3 / 1,000
San Lucas	4.5 (195,000)	324	13.9	0.19-0.97	LC is approx. 5X the size of the nationwide largest average area of 3 / 1,000
Spreckels	9.5 (416,000)	692	13.7	0.42-2.08	LC is approx. 5X the size of the nationwide largest average area of 3 / 1,000
	^ 1 acre is 43,560 sqft			* LC acres at the national average of 0.6–3 acres per 1,000 inhabitants	

Challenges in Rural Zoning for Mixed-Use Development.

Rural zoning for mixed-use development in the United States refers to land-use regulations that permit the integration of residential, commercial, agricultural, and sometimes institutional or recreational uses within

rural areas, which are typically characterized by low population densities, agricultural lands, and open spaces.

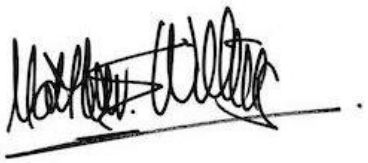
Unlike urban or suburban zoning, rural frameworks often prioritize the preservation of farmland, natural resources, and community character while addressing economic needs such as revitalizing main streets or providing housing options. This approach contrasts with traditional single-use zoning, which separates functions to minimize conflicts but can lead to sprawl and inefficiencies in rural contexts. Below, I outline key aspects, challenges, benefits, and implementation strategies based on established planning guidelines and reforms.

Rural zoning codes frequently stem from outdated models that emphasize large-lot requirements and strict separation of uses, originating from early 20th-century efforts to protect communities from industrial nuisances. These can hinder mixed-use projects by:

- Promoting sprawl and blight, which pushes development to community outskirts, increasing costs for roads, utilities, and services while eroding historic main streets as economic and social hubs.
- Contributing to farmland loss, as uncoordinated growth encroaches on agricultural lands essential for rural economies and identities.
- Limiting housing diversity, often favoring single-family homes on large lots, which restricts affordable options for families, seniors, and young professionals, accelerating population decline in rural areas.
- Creating regulatory barriers, such as inflexible codes that do not accommodate blended uses, leading to higher development costs and delays in obtaining variances or special permits.

Summary & Recommendations.

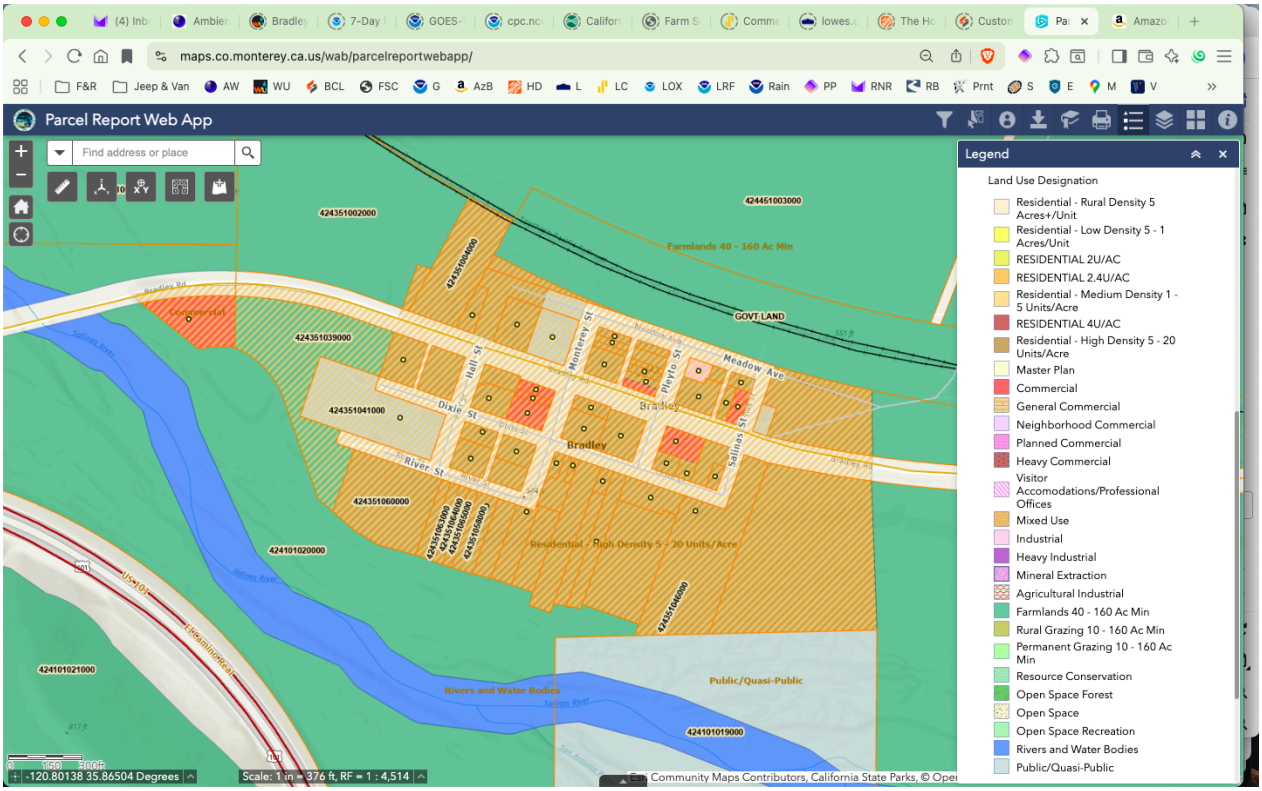
1. The size of the Lockwood LC Zone and the area of the Rural Center are vastly out of all proportion to the current and any future requirements of the local population.
2. Existing LC Zones in the South County are often far larger than needed, and when combined with the adjacent Industrial Zones are so extensive that they are subject to extended vacancy and blight.
3. The LC Zoning itself is antiquated. Rural zoning for mixed-use development offers a pathway to economically viable communities, but requires thoughtful reforms to overcome historical rigidities.
4. The LC Zone in Lockwood could be removed in its entirety and replaced with up to one acre of rural mixed-use zoning, which would be in line with the actual population and with national trends. This would be more than adequate, given that the only part of the LC Zone in the area that is developed for public use is entirely vacant and has been empty for some time.



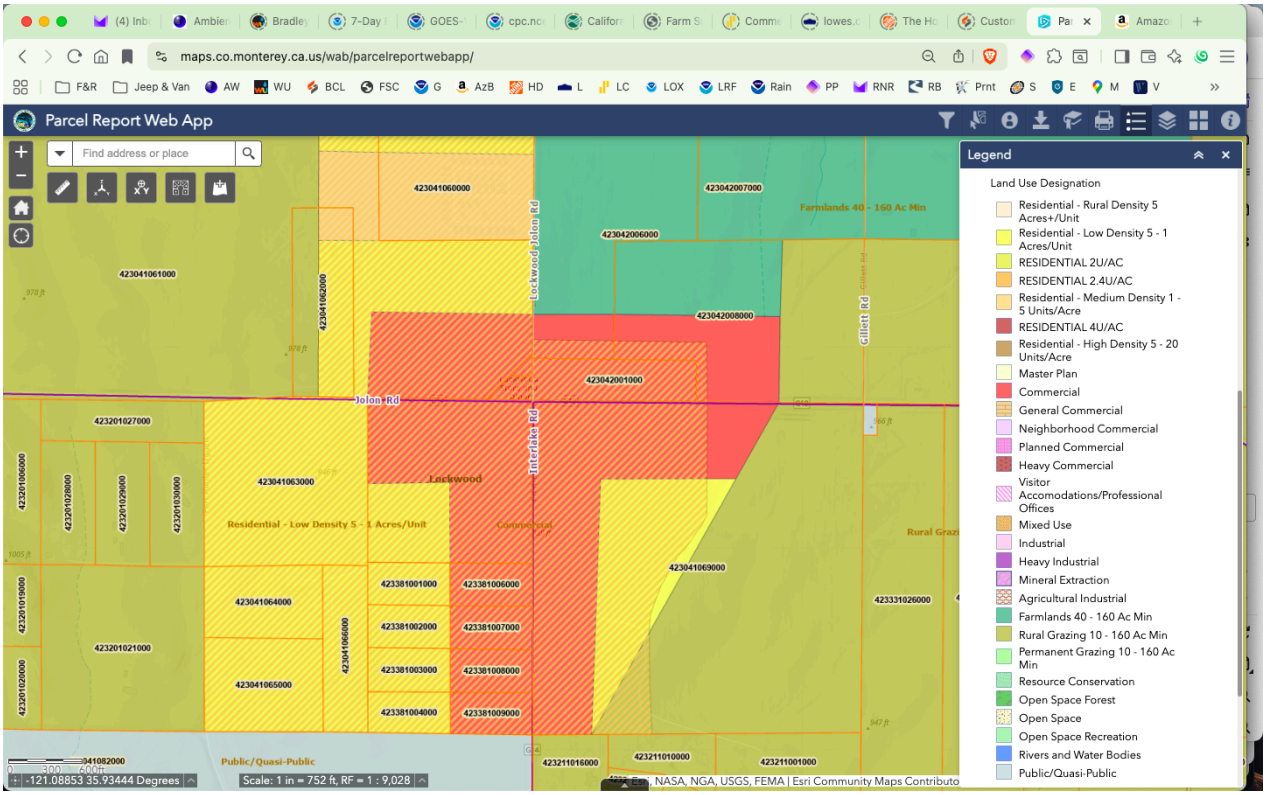
Matthew G. Willis, PhD. Lockwood, CA. February 08, 2026

Appendix 1. Map scales vary.

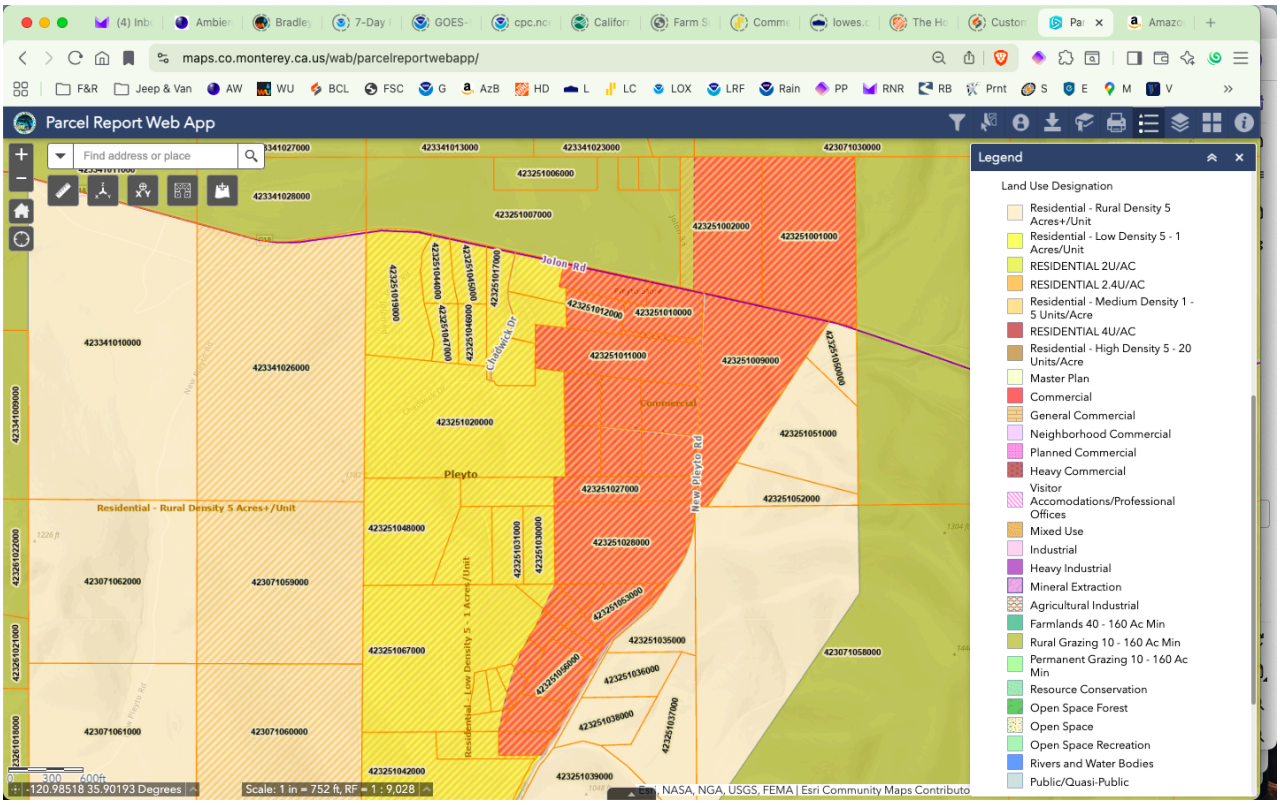
Bradley



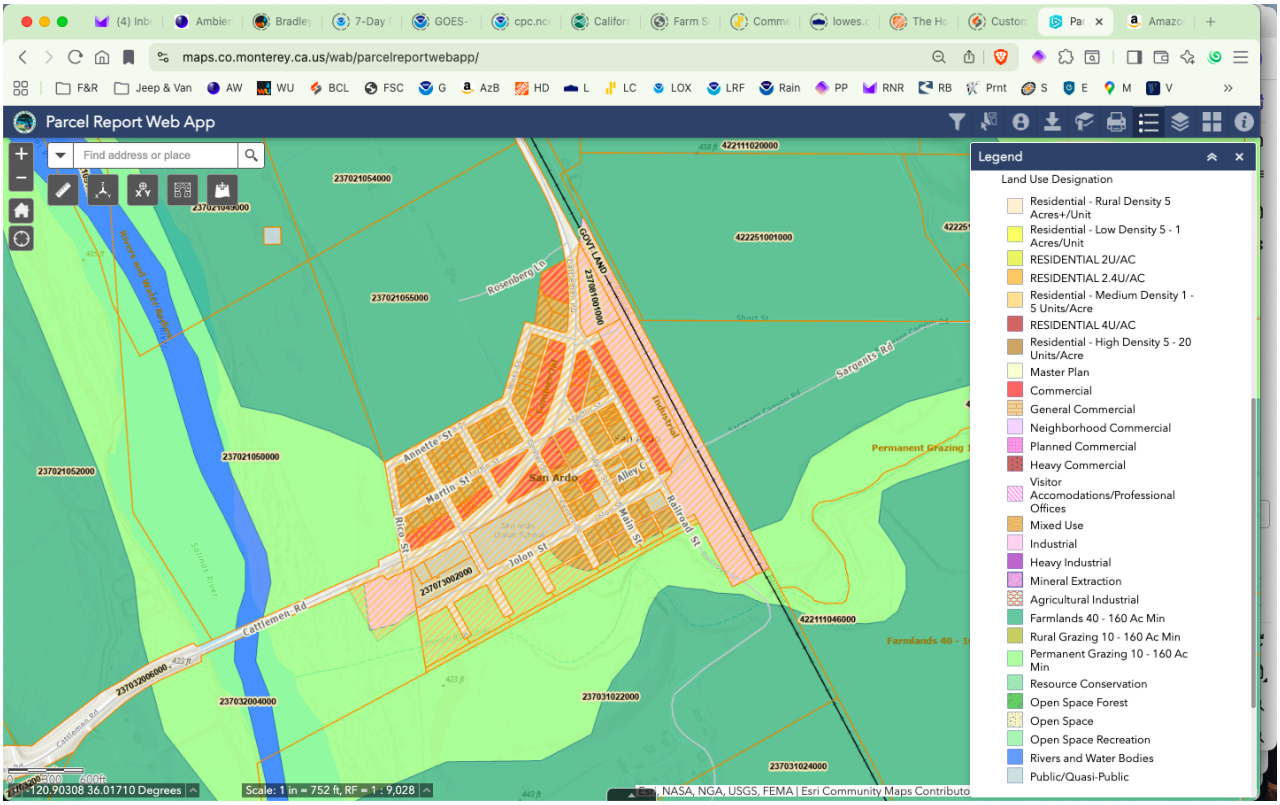
Lockwood



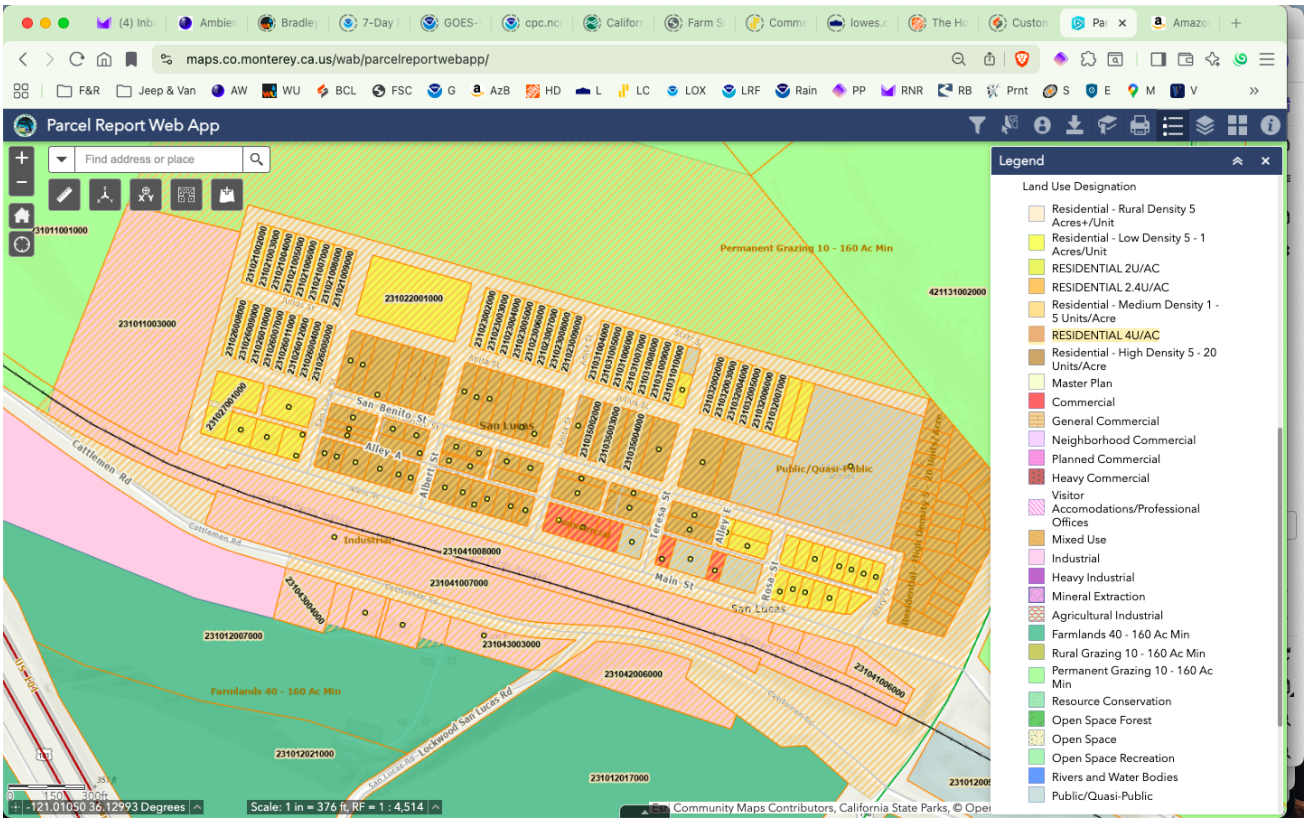
Pleyto



San Ardo



San Lucas



Spreckles