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October 23, 2023

*Via Email ~ LMoriarty@ci.methuen.ma.us*

Zoning Board of Appeals  
City of Methuen  
c/o Lori Moriarty, Zoning Board Clerk  
41 Pleasant Street  
Methuen, MA 01844

**Re:    Applicant:    Scrub-a-Dub Auto Wash Centers, Inc.**  
**Property:    171 Pelham Street**  
**Opposition to Special Permit and Variance Applications**

Dear Chair D'Agostino and Zoning Board Members,

I write on behalf of Wash, Wax and Wheels Car Wash, LLC ("Wash"), operator of the Wash, Wax and Wheels Car Wash located at 2 Baldwin Street, in opposition to Scrub-a-Dub Auto Wash Centers, Inc.'s ("Applicant") applications for certain variances and a special permit necessary to allow it to raze an existing restaurant located in the Highway Business Zoning ("BH") District at 171 Pelham Street ("Property") and replace the same with a car wash. For the following reasons, Wash respectfully requests the Zoning Board deny Applicant's requests for zoning relief.<sup>1</sup>

### **I.    The Property Does Not Meet the Criteria for the Granting of Variances**

Applicant has requested the Zoning Board issue the following variances concerning the Property:

- 1) A variance allowing lot coverage of 65.3%, nearly double the 35% maximum lot coverage allowed under the Comprehensive Zoning Ordinance ("Ordinance"); and

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<sup>1</sup> Enclosed and incorporated herein by reference are the following documents: 1) "Transportation Peer Review" from TEPP LLC dated October 18, 2023; 2) "Expert Opinion of Feasibility for Proposed Car Wash" from Daniel G. Weaver dated October 17, 2023; 3) "A Deeper Dive Into the Possible Negative Impacts to the Local Minority Community" from Julio Fuentes and Dan Talbot; and 4) Letter to Neighbors.

- 2) A variance allowing a 14.9-foot front setback from Cross Street, which is approximately 60% as large as the Ordinance's minimum front setback requirement of 25-feet.<sup>2</sup>

Under § X-D of the Ordinance, the Zoning Board may only grant Applicant its requested variances if the Zoning Board finds:

*that owing to circumstances relating to soil conditions, shape or topography of land and especially affecting such land but not affecting generally the zoning district in which the land is located and a literal enforcement of the provisions of the zoning Ordinance would involve substantial hardship to the petitioner or appellant and relief can be granted without substantial detriment to the public good and without nullifying or derogation from the intent and purpose of this zoning Ordinance.*

**A. There is Nothing Unique About the Soil Conditions, Shape, or Topography of the Property**

Before granting a variance, a zoning board must find that the soil conditions, shape, or topography of the property in question are unique and peculiar to that property (i.e., especially affect that property). Rafferty v. Sancta Maria Hospital, 5 Mass. App. Ct. 624, 631 (1977). However, in the present case, Applicant has made no showing that the soil conditions, shape, or topography of the Property are unique and peculiar to the Property.

The soil conditions of the Property are not unique. Indeed, Applicant has apparently offered no analysis of the soil conditions to justify how the soil conditions could be viewed as unique compared to the surrounding, similarly situated commercial properties. Likewise, the shape of the Property is not unique. The Property is roughly square in shape, similar to numerous other parcels in the surrounding area. Lastly, the flat topography of the Property is not unique, as it is shared by numerous abutting parcels.

As such, the Zoning Board should deny Applicant's requested variances.

**B. Any Hardship to Applicant Would Not be Owing to Unique Soil Conditions, Shape, or Topography**

Assuming a zoning board determines that soil conditions, shape, or topography of a property are unique, it cannot grant a variance unless it also finds that the applicant would suffer substantial hardship without the variance, owing to the unique condition(s) of the property.

In the present case, Applicant has not shown that the soil conditions, shape, or topography of the Property have caused a need for extreme lot coverage and a shrunken front setback. This is likely because there appears to be simply no connection between the variance relief requested, specifically targeting maximum development of the project site, and the conditions of the

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<sup>2</sup> Notably, the Zoning Table on Applicant's Site Plan has also listed possible side and rear setback nonconformities.

Property. See Shafer v. Zoning Bd. of Appeals, 24 Mass. App. Ct. 966, 967 (1987) (holding, “The ‘shape’ of a lot is not to be confused with its ‘size’”).

As such, the Zoning Board should deny Applicant’s requested variances.

**C. Relief Cannot be Granted Without Substantial Detriment to the Public Good and Without Nullifying or Derogating from the Intent and Purpose of the Ordinance**

Under § I-C of the Ordinance, the purpose of the Ordinance is to:

*promote the general welfare of the City of Methuen, to protect the health and safety of its inhabitants, to encourage the most appropriate use of land throughout the City, to preserve the cultural, historical and agricultural heritage of the community, to increase the amenities of the City and to reduce the hazard from fire by regulating the location and use of buildings and the area of open space around them . . .*

Enclosed herewith, Wash submits four documents – referenced in footnote 1, *supra* – which show that approval of Applicant’s variance requests will, at a minimum, be substantially detrimental to the public good, harm the general welfare of the City of Methuen, negatively impact the health and safety of the City’s inhabitants, and promote inappropriate use of land. The enclosures are the product of extensive work from independent experts and interested parties and should therefore be reviewed in their entirety; however, I will attempt to summarize some of the most salient points here.

- 1) Traffic flow and safety will be negatively impacted by construction and operation of the proposed car wash.

TEPP LLC’s peer review of the transportation-impact assessment (“TIA”) Applicant provided to the Zoning Board<sup>3</sup> has uncovered serious shortcomings in the TIA.

For example, the TIA only assesses the impact of the Property’s development on current traffic conditions, rather than also projecting conditions seven years out, as is standard in such assessments. As a basis for such current traffic analysis, the TIA’s traffic/trip generation assessment appears to solely rely on Applicant’s empirical data, although the collection methodology is unexplained.

Additionally, the TIA shows serious impacts to traffic congestion on Pelham Street. Yet, the TIA does not explore whether an additional driveway on Cross Street could reduce the negative impacts on traffic.

It should also be noted that traffic generated by the proposed car wash use will be disproportionately focused in the winter months, during the high-traffic, December

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<sup>3</sup> The TIA was prepared by MDM Transportation Consultants, Inc. and dated August 1, 2023.

holiday season and during the time of year when snow and ice would also be affecting traffic congestion and safety. Indeed, as indicated in the Transportation Peer Review from TEPP, LLC, car wash traffic counts are substantially increased on the weekend during the entire winter season. This inconvenience is not captured in the standard traffic study submitted by the Applicant.

- 2) There is no social, economic or community need that would be served by the proposed car wash.

As noted in Daniel G. Weaver's Feasibility Analysis, page 8, the "only viable path forward for [the proposed car wash] is with a combination of strong financial backing, strategic marketing efforts, competitive pricing, and a **commitment to outperforming and potentially displacing competition within the market.**"

**Emphasis added.** In short, the market does not have a need for the proposed car wash, and the car wash would be required to outcompete existing businesses and, ultimately, to put them out of business in order to survive.

This conclusion is reflective of the oversaturated car wash market in the area surrounding the Property. Indeed, there are 12 car washes within a five-mile radius of the Property. Two such car washes, including Wash's business, are within direct proximity of the Property, while a new car wash similar to the one proposed by Applicant is currently being constructed less than a mile away from the Property. Additionally, there are 18 small mobile car wash and auto detailing businesses within three miles of the Property. Importantly, the area surrounding the Property and occupied by these businesses is an area inhabited by predominately lower income and/or minority families.

It appears that the construction of the proposed car wash on the Property, operated by a large, regional business, could therefore result in: 1) declining quality of services and property maintenance at surrounding car washes, due to decreased profits; and 2) closure of surrounding car wash and detailing businesses. This outcome would negatively impact local, minority residents and the local economy, and would contribute to an increased ratio of vacant buildings and urban blight. There are simply better, more zoning compliant uses for the Property than construction of a car wash, such as, continuing operation of the existing restaurant or a new restaurant.

As such, the Zoning Board should deny Applicant's requested variances.

## **II. The Property Does Not Meet the Criteria for the Granting of a Special Permit**

Applicant has requested the Zoning Board issue a special permit concerning the Property under § V-D of the Ordinance, thereby allowing an "Automobile Wash" to operate on the Property.

Under § XI-B(2) of the Ordinance, the Zoning Board may only grant Applicant its requested special permit if the Zoning Board finds "that the adverse effects of the proposed use will not outweigh its beneficial impacts to the City or the neighborhood". Relatedly, in making its determination whether to issue a special permit, the Zoning Board must consider, *inter alia*,

“traffic flow and safety” and the “social, economic, or community needs which are served by the proposal”.

As outlined in § I(C) of this Letter, the adverse effects of the proposed car wash will outweigh any purported beneficial impacts to the City or the neighborhood. There is no social, economic, or community need which would be served by a corporate car wash displacing small businesses attempting to survive in an oversaturated market. Traffic flow and safety will also be negatively impacted by construction and operation of the proposed car wash.

As such, the Zoning Board should deny Applicant’s requested special permit.

### **III. Conclusion**

The Applicant has requested the Zoning Board grant substantial zoning relief necessary to allow the construction and operation of a car wash that will negatively impact the City and its residents. It is Wash’s position that Applicant is not legally entitled to its requested relief and that it will be in the best interest of the City and its residents if the relief is denied. As such, Wash respectfully requests the Zoning Board deny Applicant’s requests for zoning relief.

Should you have any questions or concerns regarding the content of this letter or any of its enclosure, please do not hesitate to contact me or my client for additional information or documentation.

Thank you for your consideration.

Very truly yours,

JOHNSON & BORENSTEIN, LLC

*/s/ Donald F. Borenstein*

Donald F. Borenstein

Cc: Gene Walsh, Building Inspector *via email*  
Julio Fuentes, Manager of Wash, Wax and Wheels Car Wash, LLC *via email*

# **EXHIBIT 1**

## MEMORANDUM

93 Stiles Road, Suite 201, Salem, New Hampshire 03079 USA  
800 Turnpike Street, Suite 300, North Andover, Massachusetts 01845 USA  
Phone (603) 212-9133 and Fax (603) 226-4108  
Email [tepp@teppllc.com](mailto:tepp@teppllc.com) and Web [www.teppllc.com](http://www.teppllc.com)

Ref: 1678  
Subject: Transportation Peer Review  
171 Pelham Street  
Methuen, Massachusetts  
From: Kim Eric Hazarvartian, Ph.D., P.E., PTOE  
Principal  
[keh@teppllc.com](mailto:keh@teppllc.com)  
Date: October 20, 2023



## INTRODUCTION

Julio Fuentes has retained TEPP LLC to prepare this preliminary transportation peer review regarding the proposed redevelopment of 171 Pelham Street in the City of Methuen, Massachusetts. This review includes comments on the transportation-impact assessment (TIA) prepared by MDM Transportation Consultants, Inc., (MDM) and dated August 1, 2023. TEPP LLC may conduct further review of this TIA and other materials or analysis.

## ANALYSIS CONDITIONS

A TIA in Massachusetts typically includes the following analysis conditions:

- existing
- no-build (seven years in the future with background-traffic growth)
- build (seven years in the future with background-traffic growth and with trips for the proposed project)

The subject TIA includes the following analysis conditions:

- 2023 baseline
- 2023 build

Therefore, the TIA does not appear to appropriately consider background-traffic growth.

## TRAFFIC COUNTS

TIA Attachments do not appear to include turning-movement counts for the Cross Street/existing site driveway intersection. However, TIA page 8 states that observed “trip generation for the restaurant use of the site has been determined based on turning movement counts conducted at the site driveways along Pelham Street and Cross Street in June 2023.” TIA Table 6, trip-generation comparison, appears to rely on said omitted turning-movement counts.

## TRIP GENERATION

TIA pages 10 to 12 include trip generation. TIA Table 5 shows trip-generation summary and TIA Table 6 shows trip-generation comparison. TIA Tables 5 and 6 appear to reflect ScrubaDub empirical data. TIA page 10 states a “detailed summary of ITE and empirical trip rates is provided in the Attachments.” However, TIA Attachments do not appear to include details on ScrubaDub empirical data.

Of particular importance is the date of the ScrubaDub data, given the seasonality of demand noted by the industry:

- “studies indicate that 32% of car consumers wash their vehicles during winter,”<sup>1</sup> with winter representing only about 25 percent of the four-season year
- “as much as 60 percent of business is done during winter and spring,”<sup>2</sup> with winter and spring representing only about 50 percent of the four-season year
- about 35 to 39 percent of annual sales volume during 12 to 13 winter weeks, with these weeks only representing about 24 to 25 percent of the 52-week year<sup>3</sup>
- about 19 percent of annual sales volume on Friday, Saturday, or Sunday during 12 to 13 winter weeks, with these 36 to 39 days representing only about 10 to 11 percent of the 365-day year<sup>4</sup>

## TRIP DISTRIBUTION AND ASSIGNMENT

TIA Figure 6 shows site generated trips, weekday morning and weekday evening peak-hour traffic volumes. TIA Figure 7 shows site generated trips, weekday midday and Saturday midday peak-hour traffic volumes. TIA Figures 5 and 6 appear to distribute and assign site trips as if

<sup>1</sup> [20 Car Wash Statistics in 2021 That Will Surprise You | DetailPro \(detailpropos.com\)](https://www.detailpro.com/car-wash-statistics-2021/), accessed October 18, 2023.

<sup>2</sup> [Car Wash Brief - For Those New to the Industry - Auto Laundry News \(carwashmag.com\)](https://www.carwashmag.com/article/car-wash-brief-for-those-new-to-the-industry), accessed October 18, 2023.

<sup>3</sup> Wash, Wax and Wheels Car Wash, LLC, 2 Baldwin Street, Methuen, Massachusetts.

<sup>4</sup> Wash, Wax and Wheels Car Wash, LLC.

they are all new trips as opposed to diverted or pass-by trips. Some site trips will be diverted or pass-by trips, which will affect area turning movements.

#### **VEHICLE QUEUES ON PELHAM STREET**

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TIA Figure 10, Concept Plan, show the site driveway intersecting Pelham Street about 100 feet (ft) west of Cross Street. TIA Tables 11 and 12, vehicle-queue analysis summary, Pelham Street at Cross Street and I-93 ramps, shows average and 95<sup>th</sup>-percentile queues at on Pelham Street eastbound that exceed 100 ft. These conditions appear to lead to the recommendation on TIA page 21 of signs and markings to prohibit blocking of the Pelham Street/proposed site driveway intersection. The TIA does not address whether providing a site driveway to Cross Street could mitigate this condition and reduce negative impacts to Pelham Street.

# **EXHIBIT 2**

October 17, 2023

Waebak, LLC  
ATTN: Mr. Rob Christy  
PO Box 547  
Newburyport, MA 01950

Re: Expert Opinion of Feasibility for Proposed Car Wash  
171 Pelham St, Methuen, MA 01844



Dear Mr. Christy,

In response to your request, I, Daniel G. Weaver, have been engaged to provide an expert opinion on the feasibility of establishing a car wash facility at 171 Pelham St, Methuen, MA 01844. With over two decades of experience as a certified general real estate appraiser, I have undertaken numerous analyses of existing and proposed car washing enterprises, encompassing both appraisals and feasibility studies across various properties akin to the proposed development.

As we discussed, and as you understood and agreed, my primary role in this endeavor is to provide an **unbiased assessment of the proposed car wash project**. The primary tenet that underscores my professional conduct is the unwavering commitment to appraiser competency as stipulated by the Uniform Standards of Professional Appraisal Practice (USPAP). This commitment extends to the rigorous adherence to the appraiser's ethical responsibilities, particularly the division between client and appraiser. My overarching principle is that the client, while deserving of respect and diligent service, is not entitled to a predetermined result skewed in their favor, as my role remains rooted in objectivity and impartiality. In light of this, I endorse and adhere to the "client is always wrong" philosophy, a stance that crystallizes the vital concept that clients may possess vested interests in the outcome, which can potentially compromise the integrity of the process. I remain **steadfast in upholding my independence and professional integrity to provide a fair and unbiased assessment**.

**Unlike non-Appraiser consultants, in alignment with the Appraiser Certification attached herewith, I affirm the following key points:**

- Independence and Impartiality:** I certify that my analyses, opinions, and conclusions are free from any bias or influence related to the subject property and the parties involved.
- No Contingency:** My engagement is devoid of any contingencies that could impact the development or reporting of predetermined results, favoring the client's cause or stipulating specific value outcomes.
- Personal Inspection:** I have personally conducted a thorough inspection of the property under evaluation.
- Independent Work:** No individual provided significant real property appraisal assistance in the preparation of this report.

In addition, I unequivocally assert that my reported analyses, opinions, and conclusions are developed and presented in strict accordance with the Code of Professional Ethics, the Standards of the Professional Appraisal Practice of the Appraisal Institute, and the Uniform Standards of Professional Appraisal Practice (USPAP).

We agreed to an abbreviated version of the typical feasibility report which systematically address crucial facets of the proposed car wash project, including the market sector, market size, the current competitive landscape, and the reciprocal impact between the new facility and the existing competitive set. Furthermore, "the key determinants of success" for the proposed venture. While our standard feasibility reports often exceed 180 pages, this concise document offers a focused assessment, typically spanning 10 to 15 pages. Should you wish to engage our services



for a more detailed report, please be aware that all the data and information utilized in the creation of this opinion letter, as well as the comprehensive report, are retained in our work file for your reference.

**Scope of Work:**

- **Research and Data Collection:** To form an informed and supported opinion on the feasibility of the proposed car wash facility, we will engage in a comprehensive research process. This will involve the collection and analysis of both industry-specific data and site-specific details. Our research will include, but not be limited to:
  - Examination of national, regional, and state-level industry statistics, where available, to gauge the car wash industry's overall performance and trends. Evaluation of relevant market research reports, industry publications, and economic indicators.
  - Site-Specific Details:
    - Review of local demographics, including population trends, income levels, and household size.
    - Analysis of consumer spending patterns and potential demand for car wash services in the Methuen area.
    - Study of traffic patterns, both vehicular and pedestrian, around the proposed location.
    - Examination of any zoning regulations and environmental considerations that may affect the development.
- **Development of Informed Opinion:** Our research will serve as the foundation for the development of an informed and supported opinion on the feasibility of the proposed car wash. To achieve this, we will:
  - Evaluate the market sector by assessing the potential demand for car wash services in the target area, taking into account demographic and economic factors.
  - Estimate the market size to determine the scale of the customer base that the car wash facility can reasonably serve.
  - Analyze the current competitive set by identifying existing car wash businesses in proximity, assessing their market share, pricing strategies, and customer satisfaction levels.
  - Consider the reciprocal impact of the competitive set on the proposed car wash and vice versa.
  - Identify and delineate the "keys to success" for the proposed car wash business, covering aspects such as location, pricing, marketing strategies, and operational efficiency.
- **Conveying Opinions Developed:** The opinions and conclusions developed through our analysis will be conveyed in this letter. Our aim is to present these findings in a clear, concise, and factual manner. While this letter provides an overview of our conclusions, please understand that a more comprehensive report would provide a step-by-step analysis of the data and methodologies employed.
  - **NOTE:** Our commitment to USPAP compliance sets us apart from many other providers of feasibility studies. As an appraiser, I inherently approach analysis and reporting with a unique mindset; one that is deeply rooted in the principles of clarity, accuracy, and the prevention of any form of misleading information, as mandated by USPAP's Standard 2-1(a). Additionally, we embrace USPAP's Standard 2-1(b), which dictates the inclusion of sufficient information to ensure that the recipient comprehends the report thoroughly. This commitment to transparency and thoroughness not only aligns with our professional values but also distinguishes our approach from that of non-appraiser providers of feasibility studies.

The following conclusions are presented based on a comprehensive analysis of the proposed car wash facility at 171 Pelham St, Methuen, MA 01844. These conclusions are designed to provide you with a well-informed perspective on the feasibility of the project, encompassing various key aspects. We invite your careful consideration of these findings as you move forward with your decision-making process.

**A. Market Sector Analysis Conclusions:** The carwash market sector in the United States demonstrates resilience and consistent consumer demand. With over 64,000 car wash businesses operating across the nation, it is a substantial



industry that plays a prominent role in the economy. Notably, a significant portion, approximately 70%, of these car washes are owned and operated by small businesses, reflecting the sector's accessibility for entrepreneurs.

Consumer behavior contributes significantly to the sector's strength, with the average American allocating \$43 per year on car wash services. This collective expenditure culminates in an impressive annual revenue of \$14.21 billion for the US car wash industry. Moreover, a substantial 70% of automobile owners have patronized car wash facilities in the last decade, translating to a daily volume of 8 million vehicles being washed.

The steady increase in the percentage of drivers who prefer professional car wash services, from 48% in 1994 to 77% in 2019, underlines the industry's growing credibility and trustworthiness among consumers. However, it is crucial to acknowledge that approximately 7% to 8% of in-bay automatic car wash businesses in the US face failure. This statistic serves as a noteworthy cautionary note for potential investors, emphasizing the importance of rigorous research and due diligence before entering the car wash business arena. It underscores the need for a comprehensive understanding of the nuances of this dynamic industry to mitigate risks effectively.

**B. Market Size Assessment Conclusions:** The market determined and used for this analysis was a five-mile radius around the selected site. Determining the local car wash market size and the market capture necessary to break even was approached using multiple methods, though some were found to be inapplicable. Scrutinizing demographic ring studies (included in attachments), the Consumer Spending Reports (retained in Work File), and traffic count capture rates (location traffic included in attachments) allowed the analyst to develop a comprehensive and reliable estimate of market.

TRADE AREA MARKET DEMOGRAPHIC STATISTICS							
		1 Miles		3 Miles		5 Miles	
TOTAL Population 2023 Estimate		7,170	100.00%	98,548	100.00%	194,207	100.00%
TARGET AGE POPULATION	Age 20-24	453	6.32%	6,780	6.88%	13,073	6.73%
	Age 25-34	884	12.33%	13,783	13.99%	26,291	13.54%
	Age 35-44	967	13.49%	13,822	14.03%	26,456	13.62%
	Age 45-54	917	12.79%	12,013	12.19%	24,060	12.39%
	Age 55-64	535	7.46%	11,935	12.11%	24,736	12.74%
TOTAL Core Customer Population		3,756	52.38%	58,333	59.19%	114,616	59.02%
TOTAL Households 2023 Estimate		2,843 Households		34,382 Households		69,933 Households	
ESSEX COUNTY HOUSEHOLD CAR OWNERSHIP	0 Cars - 4.01%	0 Cars		0 Cars		0 Cars	
	1 Car - 21.6%	614 Cars		7,427 Cars		15,106 Cars	
	2 Car - 42.6%	2,422 Cars		29,293 Cars		59,583 Cars	
	3 Car - 19.9%	1,697 Cars		20,526 Cars		41,750 Cars	
	4 Car - 8.41%	956 Cars		11,566 Cars		23,525 Cars	
	5+ Car - 3.52%	500 Cars		6,051 Cars		12,308 Cars	
TOTAL Cars in Trade Area		6,190 Cars		74,863 Cars		152,272 Cars	

Statistics point that 51% of car users prefer in-bay automatics as it entails quick washing and drying. Self-service comes second and is preferred by approximately 32% of car owners. Considering that the remaining will go to whatever is available, we factor the number of Core Customers and of cars at 59.5%. We determined 68,197 Core Customers with 90,602 cars within 5 miles of the subject location.

#### Consumer Spending Report

- Consumer Spending Data: Compiled a Consumer Spending Reports 1-, 3-, 5-mile ring study that provide data on the amount spent in the market area's Vehicle Expenses category. This data may include car



maintenance, repairs, and car wash services. Attempts to determine what category car wash expenditures fall under were unsuccessful. The statistics below indicate that based on the average purchase price of a vehicle, the expenditures for new car purchases account for 3.67% of the total cars in the market. While we determined that these statistics do not provide any insight into the local market for car washes, it does indicate that ~18.36% of the vehicles are most likely less than 5 years old. These newer cars are more likely to have owners that will frequent a carwash multiple times per month.

## TRADE AREA MARKET SPENDING STATISTICS

	1 Miles	3 Miles	5 Miles
TOTAL Households 2023 Estimate	2,843 Households	34,382 Households	69,933 Households
TOTAL 2023 Consumer Spending	\$ 98,374,283	\$ 1,030,682,475	\$ 2,253,215,478
Automotive Repair & Maintenance	\$ 3,141,899	\$ 32,399,773	\$ 70,582,066
Per Household	\$ 1,105	\$ 942	\$ 1,009
New Car Purchases	\$ 12,620,000		\$ 268,346,000
New Car Purchases (Avg \$48,008)	263		5590
Vehicle Expenses Spending/Car	\$ 4,117.86	\$ 3,497.80	\$ 3,738.86
Automotive Repair & Maintenance/Car	\$ 507.55	\$ 432.79	\$ 463.53

In addition, we looked at the Consumer Expenditures Survey, with specific look at “per person” (or Consumer Unit) for sub-category of “Vehicle products and cleaning services [D]”. This indicates a 9-year average of \$10.03 per capita spending on cleaning their cars, but this includes not only car washes, but purchases of related chemicals products. At the top end, the 194,207 5-mile population reflects a local annual car wash market of \$1,947,896 within a 5-mile radius of the subject. Considering the \$70,582,066 total household automotive spending paints a bleaker picture when factored at even the highest 1.43% “Carwash as % of Maintenance & Repairs” develop below with a market size of only \$1,009,324.

The unwelcoming outlook based on the household spending is concerning when you place it in the context of “Income” profile of the market, which though superior within a mile drops significantly in the 3-mile range, and is below national rates within 10-minute drive of the subject. An additional concern is that though incomes are in line with or below national averages, the Cost of Living in Methuen, MA is 20.8% higher than the national average.

## INCOME STATISTICS

	1 Mile	3 Miles	5 Miles	10 Minute Drive
Households	2,843	34,382	69,933	56,144
2023 Avg Household Income	\$110,090	\$88,996	\$99,465	\$92,228
2023 Med Household Income	\$95,388	\$65,786	\$77,010	\$70,163
2023 US Median Household Income		\$74,580		
Comparison to US	27.9%	-11.8%	3.3%	-5.9%

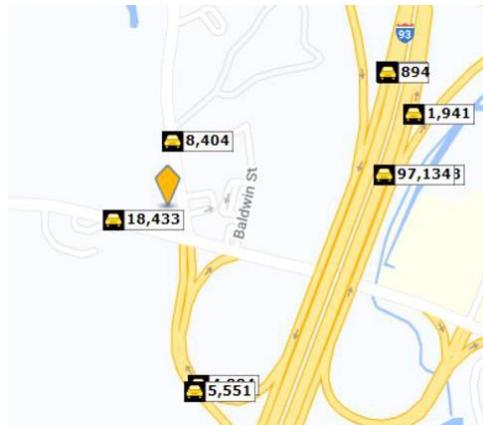
The market statistics within a 5-mile radius of the subject location present a nuanced scenario for the feasibility of a carwash business. While the total estimated population of 194,207 and an income level that's \$2,430 above the national average seem promising, it's essential to delve deeper. Notably, within a 3-mile radius, the median household income is \$8,794 below national averages, indicating pockets of lower income among the population. Moreover, a 10-minute driving radius exhibits an income that's \$4,417 below the national average. This suggests the presence of both wealthier residents and a larger population with below-average income.



The confluence of these factors raises concerns about the overall income distribution and the potential impact on discretionary spending. This concern is compounded by the current 3.7% high inflation rate and a cost of living 20% higher than the national averages, which may further strain household budgets. Given the discretionary nature of car wash expenses, these disparities in income levels could undermine the positive general population statistics, making it imperative for prospective business owners to carefully assess the market dynamics, competition, and pricing strategies for long-term viability.

### Subject Location Traffic Study

**Traffic Data:** We created a traffic study that provide data on the daily travel experienced on the subject front and side roadway as well as the closest offramp intersection. The traffic count data for the subject location at the intersection of Pelham St and Cross St, as well as the southbound Interstate 93 (I-93) exit nearby, provide valuable insights into the traffic patterns in the vicinity. In 2022, Pelham St recorded a daily traffic volume of 18,433 vehicles, demonstrating a substantial flow of vehicles along the subject's front street. Cross St, which intersects with Pelham St, saw a daily traffic volume of 8,404 vehicles, indicating moderate traffic on the subject's side street. Additionally, the southbound Interstate 93 exit located southeast across the intersection of the subject experienced a daily traffic volume of 4,884 vehicles in 2022. This data suggests that the subject location benefits from significant visibility and potential exposure to passing traffic, particularly on Pelham St, which can positively influence the feasibility and accessibility of a carwash business in this area. The presence of both local and through traffic contributes to the subject's strategic position for such a venture, although other factors such as competition and local demand must also be considered in the feasibility analysis.



To estimate daily exposure while considering potential overlap in traffic, we make the following assumptions:

- 70% of the traffic on Pelham St continues beyond the intersection.
- 30% of the traffic on Cross St is not double-counted and proceeds beyond the intersection.
- 5% of the traffic from the offramp also traverses Cross St.

Given these assumptions and the provided traffic data:

- Estimated daily exposure on Pelham St: 12,903 vehicles/day
- Estimated daily exposure on Cross St: 2,521 vehicles/day
- Estimated daily exposure from the offramp: 244 vehicles/day

The total estimated daily exposure at the subject location, accounting for potential overlap, is 15,668 vehicles/day, rounded to 15,670.

Reports provided by equipment manufacturers often discussed what traffic count is needed to assure a profitable location. To paraphrase: Enough cars are needed to pass by every day so even if only a tiny percentage stopped for a wash that would be enough to pay the bills and have a significant profit left over. To determine the number of vehicles, average daily traffic flow and a capture rate the location is likely to achieve are needed. The reports mentioned that many factors can affect capture rate including visibility, speed limit, traffic light or stop sign, ease of entry and exit, and presence of other businesses.

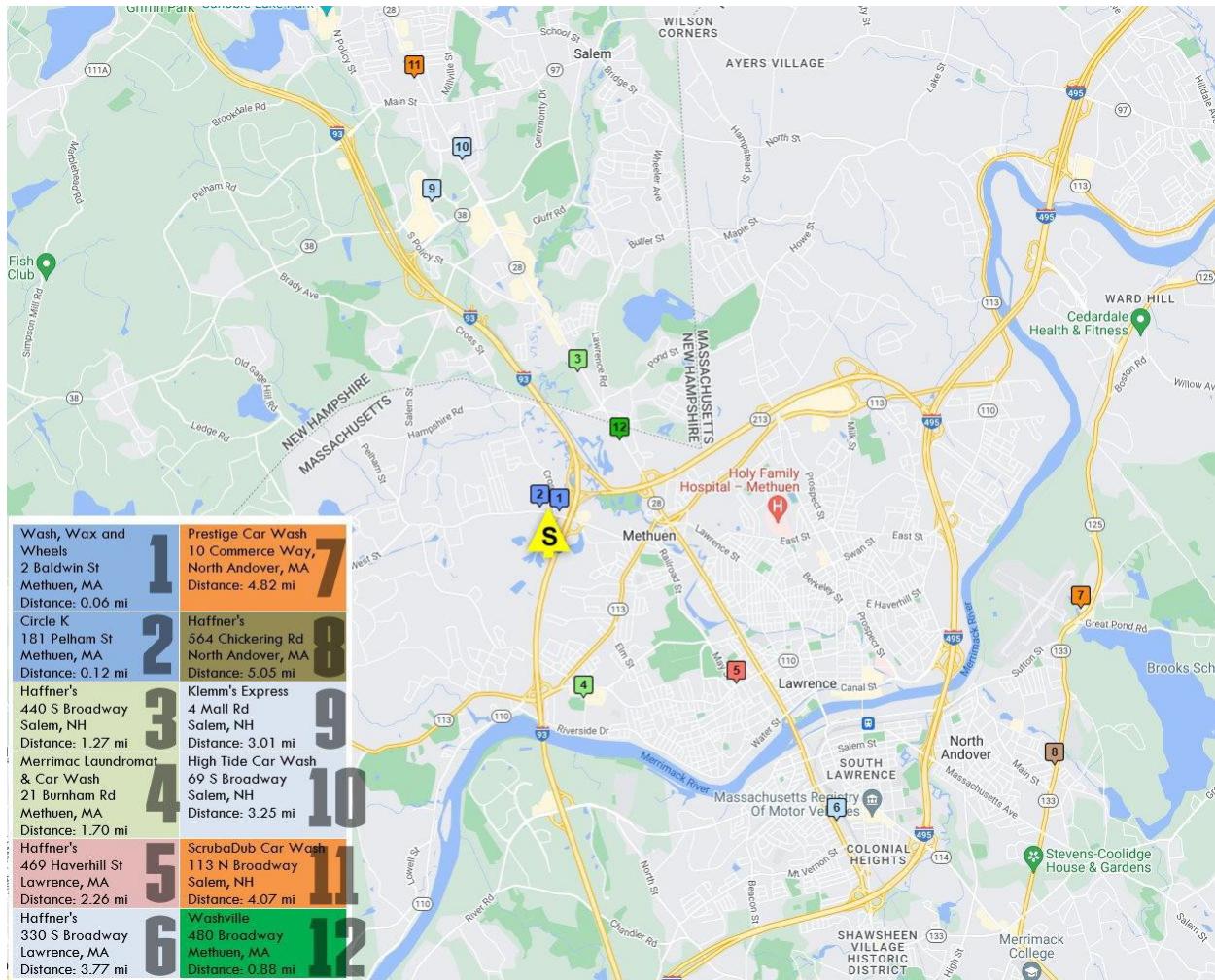
The estimated daily traffic count of 15,670 cars passing by our subject location offers insights into its potential as a site for a carwash business. Three key factors come into play when assessing this traffic:



- Number of Cars:** The daily traffic count of 15,670 cars per day falls within the lower end of the range recommended by research, which suggests that car wash locations with an average of 15,000 to 25,000 cars a day tend to perform best. While it's on the lower side, this count still signifies a steady flow of potential customers, provided other factors are favorable.
- Traffic Speed:** The traffic speed at the location, benefiting from a lighted intersection, is a positive aspect. Smooth traffic flow encourages drivers to make quick decisions, potentially increasing the likelihood of impulse visits to a carwash.
- Traffic Density and Timing:** The challenge lies in traffic density and timing. A significant portion of the traffic appears to be concentrated during rush hours in the morning and afternoon. While this indicates high-density periods, it could also lead to potential issues, such as long lines and wait times for customers during peak hours. Prolonged wait times might limit the actual capture of a large portion of the traffic.

### C. Competitive Set Evaluation Conclusions

We found at least 10 existing and one approved competitive automatic car washes within the 5 mile demographical market area. There may be an additional Haffner's location, as they are the major player in the market with car washes at most of their gas stations in the area.



In my professional opinion, the current competitive set of 10 existing automatic car washes, along with the recent approval for the construction of one more, raises concerns about market saturation and the ability to sustain all these

facilities effectively. This concern is underscored by the demographic profile of the market, particularly within the 3-mile radius, which exhibits overall weakness.

Of specific concern are the two existing car wash facilities located within less than 1/8th of a mile from the subject location. The presence of such proximate competition could potentially lead to market fragmentation and intensified competition for a limited customer base. Additionally, the approval for the construction of a new car wash facility, which bears a striking similarity to the planned subject facility and is situated less than a mile away, exacerbates the situation.

It is my professional opinion that the market's current capacity may not adequately support the coexistence of the existing, under-construction, and proposed facilities into the foreseeable future. Given the level of competition and the market's demographic weaknesses, it is likely that one or more car wash facilities will face significant challenges in sustaining operations. Market dynamics, competition, and consumer demand will play a crucial role in determining the long-term viability of these car wash businesses.

#### D. Impact Assessment Conclusions

In the assessment of the impact of the new car wash facility on the subject property, several key conclusions emerge. Firstly, it is evident that the introduction of the new facility will contribute to an oversaturation situation within the market. This saturation is particularly concerning given the demographic weaknesses within the 3-mile radius and the presence of existing car wash facilities, including two in extremely close proximity to the subject property.

However, the good news for the subject property lies in its superior overall location and visibility compared to other market participants. These advantages can potentially help attract customers seeking convenient and easily accessible car wash services. Nevertheless, the development of the subject location will necessitate those car washes most closely located in the competitive set to adjust their pricing strategies significantly below the rates offered by the new facility to remain competitive and thrive.

To navigate this competitive landscape effectively, it is strongly recommended that the subject property be prepared to match any pricing reductions made by the competition in their less advantageous locations, even if it means operating at a 'break-even' level. The facility should ensure that it has sufficient operating expenses to sustain such pricing adjustments for a minimum of 24 months, allowing for a significant period of market adjustment.

Ultimately, as the newer and larger facility gains a foothold and captures a substantial portion of the market, it is foreseeable that other car wash operations in less desirable locations may no longer be financially viable. Thus, strategic pricing, superior location, and operational preparedness will be critical factors in the subject property's ability to establish itself as a long-term and successful player in the competitive car wash market.

#### E. Keys to Success for the Proposed Business

In light of the comprehensive analysis conducted, several key factors will be critical to the success of the proposed car wash business:

- Strategic Pricing:** Given the market's competitive nature and the imminent introduction of a new facility, the ability to strategically adjust pricing to remain competitive while ensuring profitability will be paramount. Preparedness to operate at or near 'break-even' levels for an extended period may be necessary.
- Superior Location and Visibility:** Leveraging the subject property's advantageous location and high visibility will be crucial in attracting and retaining customers. Effective marketing and signage will further enhance the facility's prominence.
- Operational Preparedness:** Ensuring that the business has sufficient operating expenses to sustain below-market pricing for at least 24 months is vital. This will provide the necessary buffer to withstand competitive pressures while building a customer base.



- Customer Experience:** Focusing on delivering an exceptional customer experience, including efficient service, high-quality results, and excellent customer service, will be essential for building customer loyalty.
- Monitoring Market Dynamics:** Continual monitoring of market dynamics, including competition, traffic patterns, and changing demographics, will enable the business to adapt its strategies in response to evolving conditions.
- Adaptive Marketing:** Implementing a flexible and adaptive marketing strategy that leverages both traditional and digital channels will help the business reach a broad customer base and respond swiftly to changing market conditions.
- Quality Assurance:** Maintaining rigorous standards for car wash quality and equipment maintenance is vital to ensure customer satisfaction and minimize downtime.
- Financial Resilience:** Having a solid financial plan and contingency measures in place to weather potential challenges, **such as prolonged periods of below-market pricing** or unexpected operational disruptions, will contribute to long-term viability.

In conclusion, success in the proposed car wash business will hinge on a combination of strategic pricing, location advantage, operational preparedness, customer-centric approaches, adaptability, and financial resilience. By focusing on these key factors and staying attuned to market dynamics, the business can position itself for sustainable growth and profitability in a competitive market.

**Final Opinion of Feasibility:**

In conclusion, the feasibility of the proposed car wash project hinges on several critical factors. While I can offer insights and analysis based on available data, it's crucial to emphasize that a definitive assessment of feasibility requires access to specific financial details, including investment in the building, financing arrangements, a comprehensive business plan, and the management structure.

That said, it is evident that for this project to have a reasonable chance of success, it will demand a robust financial foundation. **This foundation should include not only the initial capital investment but also the resilience to navigate potential periods of intense competition and pricing pressures.**

Moreover, aggressive and adaptable marketing strategies will be essential in establishing the facility's presence in a competitive market. Pricing strategies should be agile and competitive, **with a willingness to challenge existing competitors and potentially drive them from the market.**

In essence, while I cannot make a final determination of the project's feasibility without access to specific financial details, it is clear that the only viable path forward for this venture is with a combination of strong financial backing, strategic marketing efforts, competitive pricing, and **a commitment to outperforming and potentially displacing competition within the market.** These elements will be pivotal in realizing the project's long-term success.

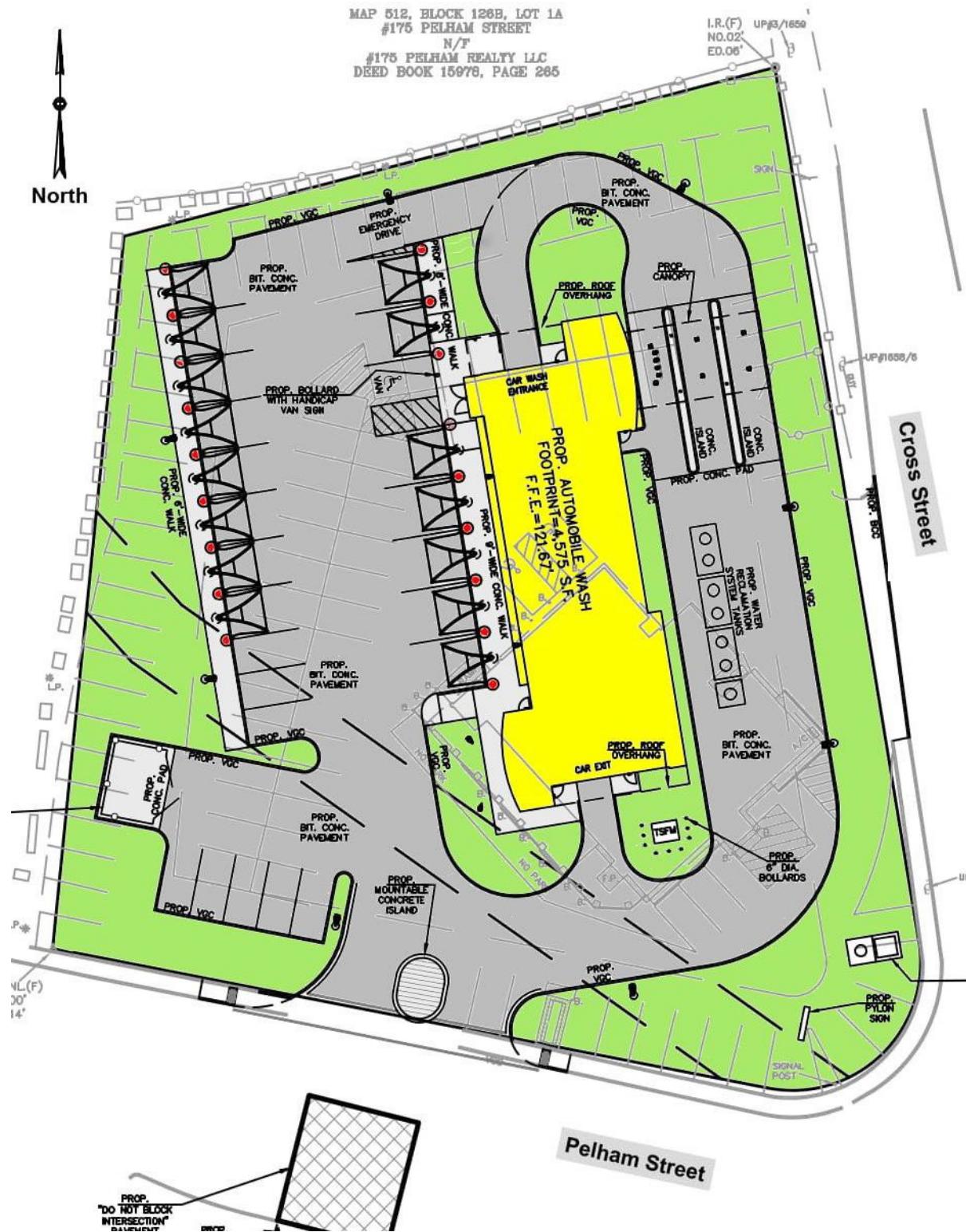
If you have any additional questions, or would like to sit down and review the information in person, feel free to send me an email or call the office to schedule a time.

Respectfully Submitted,  
Appraisals Unlimited

  
Daniel G Weaver  
Massachusetts Certified General Real Estate Appraiser #103509



### Provided Proposed Site Plan:



**Provided Proposed Development Description:**

Under the proposed Site programming the existing site use will be replaced with a modular single tunnel car wash building and fifteen (15) self-service vacuums. Access/egress to the site will be consolidated to a single full access curb cut along Pelham Street. The Site will be supported by approximately 24 on-site parking spaces. The projected peak hour car wash tunnel trip activity is estimated at approximately 91 trips under a theoretical peak season condition. The critical peak hour demand under this theoretical condition is estimated to result in a maximum estimated queue of 15 vehicles and an estimated queue of 7 cars under maximum efficiency conditions. The car wash tunnel configuration and queue lane can accommodate a 32-vehicle queue.

**Comments on Proposed Design:**

The proposed design and layout for the carwash facility, featuring a modern 120-foot tunnel design, presents several noteworthy considerations.

Firstly, the inclusion of a single tunnel car wash building and fifteen self-service vacuums reflects a design that caters to efficient and high-capacity car washing and cleaning. This design choice aligns with the potential high volume of traffic in the market area and positions the facility to serve a substantial number of customers effectively.

The planned consolidation of access and egress to the Site via a single full access curb cut along Pelham Street simplifies traffic flow and entry for customers. However, it's worth noting that the layout could potentially be optimized to take advantage of the Cross Street frontage. Leveraging this frontage could provide a more convenient egress option for customers heading east, especially considering that a significant portion of the market population resides in that direction. Incorporating egress access to a traffic signal on Cross Street could enhance the overall efficiency of the facility's traffic management.

Regarding parking, the provision of approximately 24 on-site parking spaces aligns with the anticipated demand during peak hours. However, it's essential to ensure that these parking spaces are designed for convenient ingress and egress, minimizing potential congestion within the lot.

The projected peak-hour car wash tunnel trip activity of approximately 91 trips during theoretical peak season conditions underscores the facility's potential to accommodate a substantial customer base. The design's ability to manage a maximum estimated queue of 15 vehicles and an estimated queue of 7 cars under maximum efficiency conditions suggests efficient traffic flow and minimal wait times for customers.

Additionally, the car wash tunnel configuration and queue lane's capacity to accommodate a 32-vehicle queue positions the facility to handle peak demand effectively.

It's worth noting that the proposed design boasts superior capacity compared to many car wash facilities within the competitive set. With a modern 120-foot tunnel configuration, 15 self-service vacuums, and the ability to accommodate a 32-vehicle queue, this design positions the facility as well-equipped to handle high demand efficiently. This enhanced capacity could be a significant advantage, allowing the car wash to serve a larger customer base effectively, particularly during peak hours and seasons of heightened activity.

In summary, the proposed design and layout exhibit a thoughtful approach to providing high-capacity car wash and vacuum services. While the consolidation of access along Pelham Street is logical, exploring potential adjustments to leverage the Cross Street frontage for egress could enhance customer convenience. Overall, the design appears well-suited to serve the anticipated traffic volume and aligns with the facility's potential for efficient operations.



# Qualifications of Daniel G Weaver

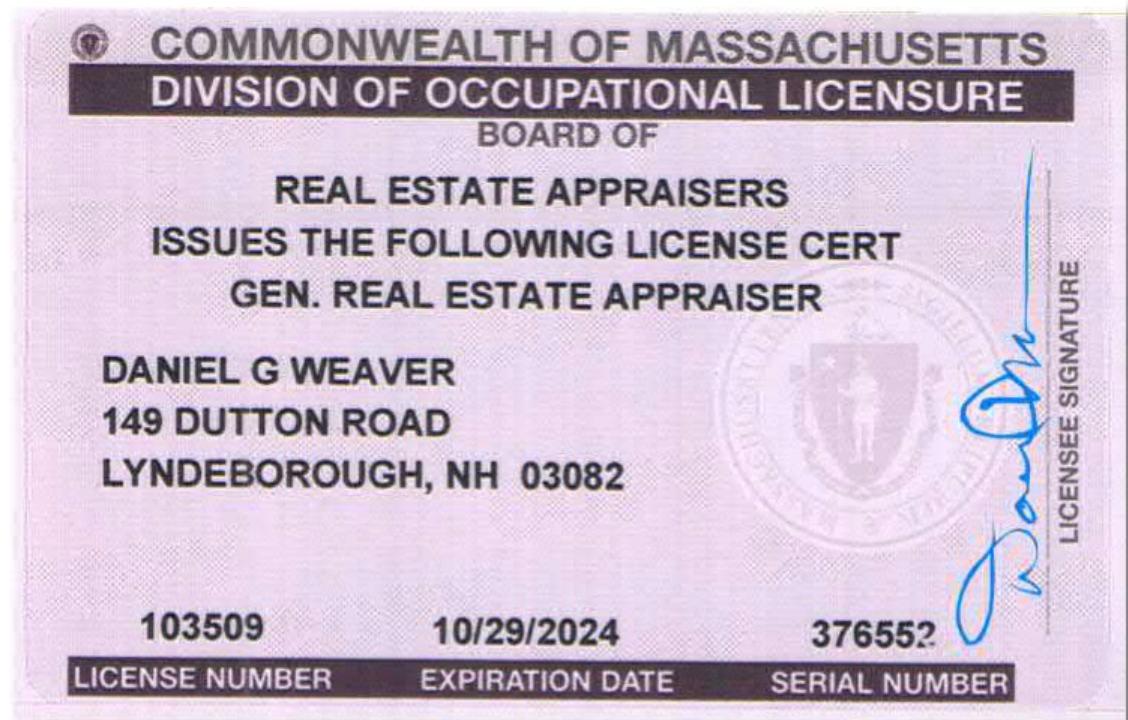
C 508.808.5748

DWeaver@Appraiser.net

Licensure	Professional Experience
<b>Certified General Real Estate Appraiser</b> Massachusetts #103509 Connecticut #RC60001428 New Hampshire #NHCG-884 Rhode Island #CGA.0020039 Maine #CG3585 New York #46000051749	<b>Appraisals Unlimited - Commercial</b> , Needham Heights, MA <i>Chief Commercial Appraiser, Partner</i> 03/2015 - Present <b>Weaver Appraisals, Memphis, MI</b> <i>Appraiser, Owner, &amp; Founder</i> 10/2000 – 3/2015 <b>Quality Appraisals, Winter Park, FL</b> <i>Staff Appraiser</i> 9/98 - 10/00 <b>Lacore Appraisals, Apopka, FL</b> <i>Staff Appraiser</i> 2/99 – 3/00 <b>Central Florida Appraisal Consultant, Orlando, FL</b> <i>Staff Appraiser</i> 5/98 - 8/98 <b>Phil Addison &amp; Associates, Bristol, TN</b> <i>Researcher, Assistant</i> 7/88 - 10/91
<b>Services</b>	
Commercial Appraisals Residential Appraisals FHA Appraisals Highest and Best Use Studies Feasibility Studies Cost to Cure Depreciation Estimates Expert Witness Services Appraisal Review Comparable Rent Schedule	
<b>Clients</b>	
Commercial Banks Mortgage Bankers Appraisal Management Companies Insurance Companies Government Private Lenders Attorneys Buyers and Sellers	<b>East TN State University</b> – BA Political Science/Pre-Law 1991 <b>IFREC</b> -Residential Real Estate Appraisal Course ABI - 6/98 <b>IFREC</b> -Uniform Standards of Professional Appraisal Practice - 6/98 <b>Real Estate Education Specialists</b> -Residential Course ABII - 7/00 <b>Real Estate Education Specialists</b> -Commercial Course ABIII - 4/01 <b>McKissock LP</b> -Income Capitalization - 4/04 <b>McKissock LP</b> -Information Technology and the Appraiser - 4/04 <b>McKissock LP</b> -FHA Appraising Today - 5/04 <b>McKissock LP</b> -Construction Details and Trends - 5/06 <b>McKissock LP</b> -Appraising the Oddball - 5/06 <b>McKissock LP</b> -Disclosures & Disclaimers - 5/06 <b>McKissock LP</b> -Environmental Issues for Appraisers - 3/08 <b>McKissock LP</b> -Relocation Appraisal is Different- 5/08 <b>McKissock LP</b> -Private Appraisal Assignments – 5/08 <b>McKissock LP</b> -National USPAP Update - 4/04 & 5/06 & 3/08 <b>McKissock LP</b> -Michigan Law - 4/04, 3/06, 3/08, 4/10 & 05/12 <b>McKissock LP</b> -2010-2011 National USPAP Update - 4/10 <b>McKissock LP</b> -Ad Valorum Tax Consultation - 4/10 <b>McKissock LP</b> -Statistics, Modeling and Finance - 4/10 <b>McKissock LP</b> -2012-2013 National USPAP Update -5/12 <b>McKissock LP</b> -Environmental Contamination of Income Properties -5/12 <b>McKissock LP</b> -Appraising & Analyzing Ind & Flex Bldgs for Mortgage Underwriting -5/12 <b>McKissock LP</b> -Appraising & Analyzing Retail Shopping Cntrs for Mortgage Underwriting -5/12 <b>McKissock LP</b> -2014-2015 National USPAP Update -5/14 <b>McKissock LP</b> -Reviewer Checklist -5/14 <b>McKissock LP</b> - The Cost Approach - 5/14 <b>McKissock LP</b> - 2-4 Family Finesse - 5/14 <b>McKissock LP</b> - 2016-2017 National USPAP Update - 04/16 <b>McKissock LP</b> - The Nuts and Bolts of Green Building for Appraisers - 04/16 <b>McKissock LP</b> - Connecticut Appraisal Law Update - 04/16 <b>McKissock LP</b> - Appraisal of Assisted Living Facilities - 04/16 <b>McKissock LP</b> - Advanced Hotel Appraising - Full Service Hotels - 04/16 <b>McKissock LP</b> - The Dirty Dozen - 10/16 <b>McKissock LP</b> - Divorce and Estate Appraisals - 11/16 <b>McKissock LP</b> - Appraisal of Industrial Incubators - 12/17 <b>McKissock LP</b> - Appraisal of Self Storage Facilities - 12/17



APPRAISER LICENSE



State of New Hampshire



Real Estate Appraisers Board

Authorized as  
Certified General Appraiser

Issued To

DANIEL G WEAVER

License Number: NHCG-884  
Active

Issue Date: 03/25/2015

Expiration Date: 10/31/2024

# Demographic Trend Report

1 Mile Radius

171 Pelham St, Methuen, MA 01844

Building Type: **General Retail**  
 Secondary: **Restaurant**  
 GLA: **7,633 SF**  
 Year Built: **1945**

Total Available: **0 SF**  
 % Leased: **100%**  
 Rent/SF/Yr: **-**



Description	2010	2023	2028
<b>Population</b>	<b>6,833</b>	<b>7,170</b>	<b>7,373</b>
Age 0 - 4	437 6.40%	409 5.70%	420 5.70%
Age 5 - 9	455 6.66%	422 5.89%	423 5.74%
Age 10 - 14	464 6.79%	447 6.23%	436 5.91%
Age 15 - 19	453 6.63%	467 6.51%	454 6.16%
Age 20 - 24	381 5.58%	453 6.32%	464 6.29%
Age 25 - 29	434 6.35%	433 6.04%	457 6.20%
Age 30 - 34	455 6.66%	451 6.29%	452 6.13%
Age 35 - 39	475 6.95%	483 6.74%	464 6.29%
Age 40 - 44	505 7.39%	484 6.75%	481 6.52%
Age 45 - 49	515 7.54%	453 6.32%	475 6.44%
Age 50 - 54	513 7.51%	464 6.47%	464 6.29%
Age 55 - 59	402 5.88%	479 6.68%	463 6.28%
Age 60 - 64	369 5.40%	456 6.36%	458 6.21%
Age 65 - 69	279 4.08%	395 5.51%	421 5.71%
Age 70 - 74	214 3.13%	328 4.57%	363 4.92%
Age 75 - 79	169 2.47%	236 3.29%	283 3.84%
Age 80 - 84	160 2.34%	152 2.12%	194 2.63%
Age 85+	153 2.24%	159 2.22%	202 2.74%
<b>Age 15+</b>	<b>5,477 80.16%</b>	<b>5,893 82.19%</b>	<b>6,095 82.67%</b>
<b>Age 20+</b>	<b>5,024 73.53%</b>	<b>5,426 75.68%</b>	<b>5,641 76.51%</b>
<b>Age 65+</b>	<b>975 14.27%</b>	<b>1,270 17.71%</b>	<b>1,463 19.84%</b>
<b>Median Age</b>	<b>39</b>	<b>40</b>	<b>41</b>
<b>Average Age</b>	<b>38.30</b>	<b>40.10</b>	<b>41.00</b>
<b>Population By Race</b>	<b>6,833</b>	<b>7,170</b>	<b>7,373</b>
White	6,120 89.57%	6,061 84.53%	6,131 83.15%
Black	281 4.11%	451 6.29%	511 6.93%
Am. Indian & Alaskan	39 0.57%	57 0.79%	65 0.88%
Asian	244 3.57%	360 5.02%	390 5.29%
Hawaiian & Pacific Islander	9 0.13%	14 0.20%	16 0.22%
Other	126 1.84%	226 3.15%	260 3.53%

# Demographic Trend Report

1 Mile Radius

171 Pelham St, Methuen, MA 01844					
Description	2010	2023	2028		
<b>Population by Race (Hispanic)</b>	<b>1,069</b>	<b>1,783</b>	<b>2,045</b>		
White	796 74.46%	1,305 73.19%	1,493 73.01%		
Black	155 14.50%	252 14.13%	284 13.89%		
Am. Indian & Alaskan	29 2.71%	45 2.52%	50 2.44%		
Asian	15 1.40%	26 1.46%	31 1.52%		
Hawaiian & Pacific Islander	9 0.84%	14 0.79%	16 0.78%		
Other	65 6.08%	140 7.85%	169 8.26%		
<b>Household by Household Income</b>	<b>2,687</b>	<b>2,842</b>	<b>2,930</b>		
<\$25,000	721 26.83%	464 16.33%	467 15.94%		
\$25,000 - \$50,000	545 20.28%	303 10.66%	303 10.34%		
\$50,000 - \$75,000	491 18.27%	371 13.05%	373 12.73%		
\$75,000 - \$100,000	200 7.44%	347 12.21%	363 12.39%		
\$100,000 - \$125,000	320 11.91%	368 12.95%	374 12.76%		
\$125,000 - \$150,000	152 5.66%	406 14.29%	432 14.74%		
\$150,000 - \$200,000	191 7.11%	253 8.90%	263 8.98%		
\$200,000+	67 2.49%	330 11.61%	355 12.12%		
<b>Average Household Income</b>	<b>\$70,772</b>	<b>\$110,090</b>	<b>\$111,929</b>		
<b>Median Household Income</b>	<b>\$53,604</b>	<b>\$95,388</b>	<b>\$97,175</b>		

171 Pelham St, Methuen, MA 01844

Building Type: **General Retail**  
 Secondary: **Restaurant**  
 GLA: **7,633 SF**  
 Year Built: **1945**

Total Available: **0 SF**  
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 Rent/SF/Yr: **-**



Image Coming Soon

Description	2010	2023	2028
<b>Population</b>	<b>88,604</b>	<b>98,548</b>	<b>102,406</b>
Age 0 - 4	6,522 7.36%	6,064 6.15%	6,236 6.09%
Age 5 - 9	6,287 7.10%	6,206 6.30%	6,252 6.11%
Age 10 - 14	6,660 7.52%	6,487 6.58%	6,377 6.23%
Age 15 - 19	7,163 8.08%	6,787 6.89%	6,607 6.45%
Age 20 - 24	6,478 7.31%	6,780 6.88%	6,778 6.62%
Age 25 - 29	6,191 6.99%	6,739 6.84%	6,829 6.67%
Age 30 - 34	5,729 6.47%	7,044 7.15%	6,925 6.76%
Age 35 - 39	5,920 6.68%	7,149 7.25%	7,063 6.90%
Age 40 - 44	6,446 7.28%	6,673 6.77%	7,009 6.84%
Age 45 - 49	6,588 7.44%	5,983 6.07%	6,597 6.44%
Age 50 - 54	6,045 6.82%	6,030 6.12%	6,198 6.05%
Age 55 - 59	4,957 5.59%	6,148 6.24%	6,034 5.89%
Age 60 - 64	3,961 4.47%	5,787 5.87%	5,868 5.73%
Age 65 - 69	2,781 3.14%	4,846 4.92%	5,343 5.22%
Age 70 - 74	2,106 2.38%	3,851 3.91%	4,472 4.37%
Age 75 - 79	1,668 1.88%	2,638 2.68%	3,359 3.28%
Age 80 - 84	1,438 1.62%	1,636 1.66%	2,222 2.17%
Age 85+	1,663 1.88%	1,698 1.72%	2,237 2.18%
<b>Age 15+</b>	<b>69,134 78.03%</b>	<b>79,789 80.96%</b>	<b>83,541 81.58%</b>
<b>Age 20+</b>	<b>61,971 69.94%</b>	<b>73,002 74.08%</b>	<b>76,934 75.13%</b>
<b>Age 65+</b>	<b>9,656 10.90%</b>	<b>14,669 14.89%</b>	<b>17,633 17.22%</b>
<b>Median Age</b>	<b>34</b>	<b>37</b>	<b>39</b>
<b>Average Age</b>	<b>35.30</b>	<b>38.00</b>	<b>39.20</b>
<b>Population By Race</b>	<b>88,604</b>	<b>98,548</b>	<b>102,406</b>
White	71,187 80.34%	75,249 76.36%	77,340 75.52%
Black	9,799 11.06%	12,862 13.05%	13,731 13.41%
Am. Indian & Alaskan	1,859 2.10%	2,105 2.14%	2,257 2.20%
Asian	2,263 2.55%	3,563 3.62%	3,825 3.74%
Hawaiian & Pacific Islander	285 0.32%	346 0.35%	387 0.38%
Other	2,811 3.17%	4,423 4.49%	4,867 4.75%

# Demographic Trend Report

3 Mile Radius

171 Pelham St, Methuen, MA 01844						
Description	2010	2023		2028		
<b>Population by Race (Hispanic)</b>	<b>43,919</b>	<b>56,797</b>		<b>61,015</b>		
White	31,362 71.41%	39,772	70.02%	42,629	69.87%	
Black	8,011 18.24%	10,566	18.60%	11,266	18.46%	
Am. Indian & Alaskan	1,691 3.85%	1,950	3.43%	2,096	3.44%	
Asian	401 0.91%	524	0.92%	580	0.95%	
Hawaiian & Pacific Islander	282 0.64%	344	0.61%	385	0.63%	
Other	2,171 4.94%	3,642	6.41%	4,058	6.65%	
<b>Household by Household Income</b>	<b>30,450</b>	<b>34,381</b>		<b>35,855</b>		
<\$25,000	9,527 31.29%	7,226	21.02%	7,353	20.51%	
\$25,000 - \$50,000	7,363 24.18%	6,511	18.94%	6,689	18.66%	
\$50,000 - \$75,000	5,094 16.73%	5,252	15.28%	5,421	15.12%	
\$75,000 - \$100,000	2,864 9.41%	4,179	12.15%	4,404	12.28%	
\$100,000 - \$125,000	2,474 8.12%	3,237	9.42%	3,389	9.45%	
\$125,000 - \$150,000	1,126 3.70%	2,646	7.70%	2,849	7.95%	
\$150,000 - \$200,000	1,290 4.24%	2,628	7.64%	2,810	7.84%	
\$200,000+	712 2.34%	2,702	7.86%	2,940	8.20%	
<b>Average Household Income</b>	<b>\$60,391</b>	<b>\$88,996</b>		<b>\$90,643</b>		
<b>Median Household Income</b>	<b>\$43,982</b>	<b>\$65,786</b>		<b>\$67,421</b>		

## 171 Pelham St, Methuen, MA 01844

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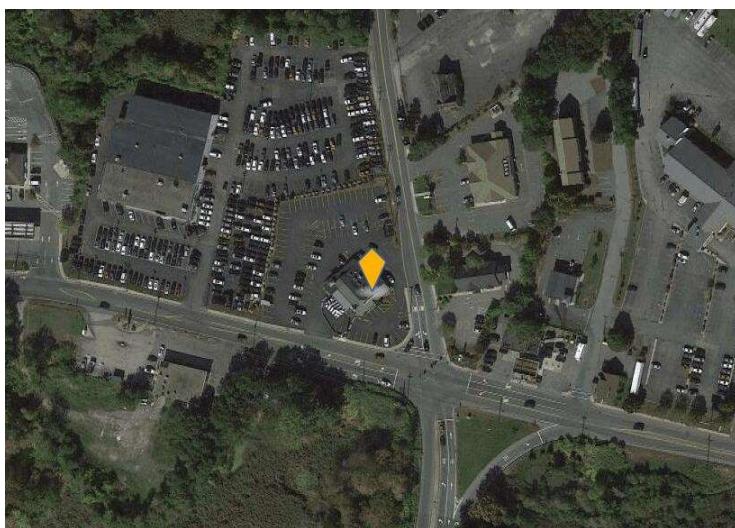


Description	2010	2023	2028
<b>Population</b>	<b>168,882</b>	<b>194,207</b>	<b>202,845</b>
Age 0 - 4	11,674 6.91%	11,505 5.92%	12,012 5.92%
Age 5 - 9	11,766 6.97%	11,755 6.05%	11,982 5.91%
Age 10 - 14	12,580 7.45%	12,390 6.38%	12,231 6.03%
Age 15 - 19	13,163 7.79%	13,080 6.74%	12,749 6.29%
Age 20 - 24	11,405 6.75%	13,073 6.73%	13,150 6.48%
Age 25 - 29	10,935 6.47%	12,923 6.65%	13,264 6.54%
Age 30 - 34	10,606 6.28%	13,368 6.88%	13,384 6.60%
Age 35 - 39	11,353 6.72%	13,567 6.99%	13,588 6.70%
Age 40 - 44	12,509 7.41%	12,889 6.64%	13,514 6.66%
Age 45 - 49	13,153 7.79%	11,848 6.10%	12,898 6.36%
Age 50 - 54	12,040 7.13%	12,212 6.29%	12,371 6.10%
Age 55 - 59	9,997 5.92%	12,661 6.52%	12,303 6.07%
Age 60 - 64	8,109 4.80%	12,075 6.22%	12,161 6.00%
Age 65 - 69	5,737 3.40%	10,182 5.24%	11,217 5.53%
Age 70 - 74	4,252 2.52%	8,136 4.19%	9,448 4.66%
Age 75 - 79	3,454 2.05%	5,587 2.88%	7,138 3.52%
Age 80 - 84	2,898 1.72%	3,450 1.78%	4,726 2.33%
Age 85+	3,251 1.93%	3,506 1.81%	4,707 2.32%
<b>Age 15+</b>	<b>132,862</b> 78.67%	<b>158,557</b> 81.64%	<b>166,618</b> 82.14%
<b>Age 20+</b>	<b>119,699</b> 70.88%	<b>145,477</b> 74.91%	<b>153,869</b> 75.86%
<b>Age 65+</b>	<b>19,592</b> 11.60%	<b>30,861</b> 15.89%	<b>37,236</b> 18.36%
<b>Median Age</b>	<b>36</b>	<b>38</b>	<b>40</b>
<b>Average Age</b>	<b>36.20</b>	<b>38.80</b>	<b>40.00</b>
<b>Population By Race</b>	<b>168,882</b>	<b>194,207</b>	<b>202,845</b>
White	139,321 82.50%	152,149 78.34%	157,114 77.46%
Black	15,232 9.02%	21,308 10.97%	23,038 11.36%
Am. Indian & Alaskan	2,953 1.75%	3,587 1.85%	3,894 1.92%
Asian	5,822 3.45%	9,095 4.68%	9,820 4.84%
Hawaiian & Pacific Islander	435 0.26%	576 0.30%	650 0.32%
Other	4,535 2.69%	7,492 3.86%	8,329 4.11%

171 Pelham St, Methuen, MA 01844						
Description	2010	2023		2028		
<b>Population by Race (Hispanic)</b>	<b>67,098</b>	<b>92,553</b>		<b>100,742</b>		
White	48,182	71.81%	65,350	70.61%	71,020	70.50%
Black	12,025	17.92%	16,819	18.17%	18,133	18.00%
Am. Indian & Alaskan	2,699	4.02%	3,331	3.60%	3,630	3.60%
Asian	583	0.87%	802	0.87%	898	0.89%
Hawaiian & Pacific Islander	424	0.63%	564	0.61%	636	0.63%
Other	3,184	4.75%	5,687	6.14%	6,424	6.38%
<b>Household by Household Income</b>	<b>60,121</b>	<b>69,934</b>		<b>73,248</b>		
<\$25,000	16,733	27.83%	12,621	18.05%	12,876	17.58%
\$25,000 - \$50,000	13,714	22.81%	11,762	16.82%	12,070	16.48%
\$50,000 - \$75,000	10,371	17.25%	9,877	14.12%	10,163	13.87%
\$75,000 - \$100,000	6,056	10.07%	8,795	12.58%	9,272	12.66%
\$100,000 - \$125,000	5,298	8.81%	7,247	10.36%	7,636	10.42%
\$125,000 - \$150,000	2,639	4.39%	5,328	7.62%	5,738	7.83%
\$150,000 - \$200,000	3,168	5.27%	7,556	10.80%	8,150	11.13%
\$200,000+	2,142	3.56%	6,748	9.65%	7,343	10.02%
<b>Average Household Income</b>	<b>\$67,809</b>	<b>\$99,465</b>		<b>\$101,306</b>		
<b>Median Household Income</b>	<b>\$49,241</b>	<b>\$77,010</b>		<b>\$79,085</b>		

**171 Pelham St**

Methuen, MA 01844 - Lawrence/Andover

**TRAFFIC COUNTS**

Pelham St/Cross St	<b>18.4K</b>
Cross St/Pelham St	<b>8.4K</b>
RAMP-RT 93 SB TO PELHAM S...	<b>4.9K</b>
RAMP-PELHAM ST TO RT 93 S...	<b>5.6K</b>

**LOCATION**

Location Score:	<b>Excellent Location (80)</b>
Walk Score®:	<b>Car-Dependent (36)</b>
Transit Score®:	<b>Minimal Transit (0)</b>

**PROPERTY**

Type:	<b>Restaurant</b>	Tenancy:	<b>0 Tenants</b>
Center:	-	Construction:	-
GLA:	<b>7,633 SF</b>	Land AC:	<b>1.12 AC</b>
Year Built/Renov	<b>1945</b>	Building FAR:	<b>0.16</b>
Floors:	<b>1</b>	Total Expenses:	-
Loading Docks:	-		
Parking	<b>58 Surface Spaces are available; Ratio of 7.60/1000 SF</b>		
Features:	-		
Frontage:	<b>227' on Pelham Street</b>		

**VACANCY**

Current:	<b>0%</b>
Last Quarter:	<b>0%</b>
Year Ago:	<b>0%</b>
Peers:	<b>0%</b>
Submarket:	<b>2.0%</b>

**NNN ASKING RENTS PER SF**

Current:	<b>\$23-28 (Est)</b>
Last Quarter:	-
Year Ago:	-
Peers (Market Rent):	<b>\$20.10</b>
Submarket (Market Rent):	<b>\$21.73</b>

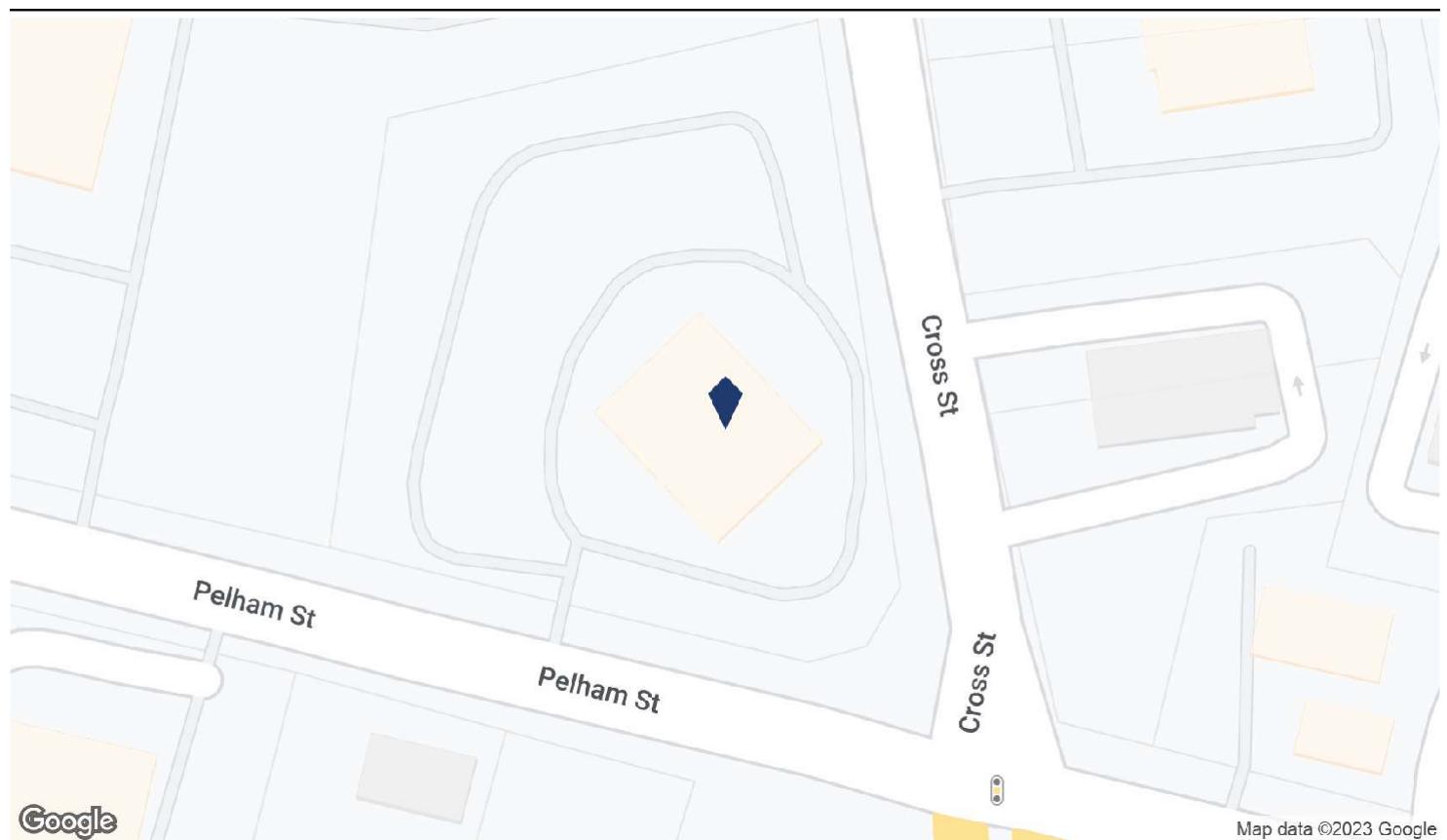
**12 MO. LEASING SF ACTIVITY**

Property:	-
Peers Total:	-
Peers Count:	<b>17</b>
Peers Avg:	-
Submarket:	<b>125,280</b>

**AVAILABLE SPACES****Currently No Available Spaces**

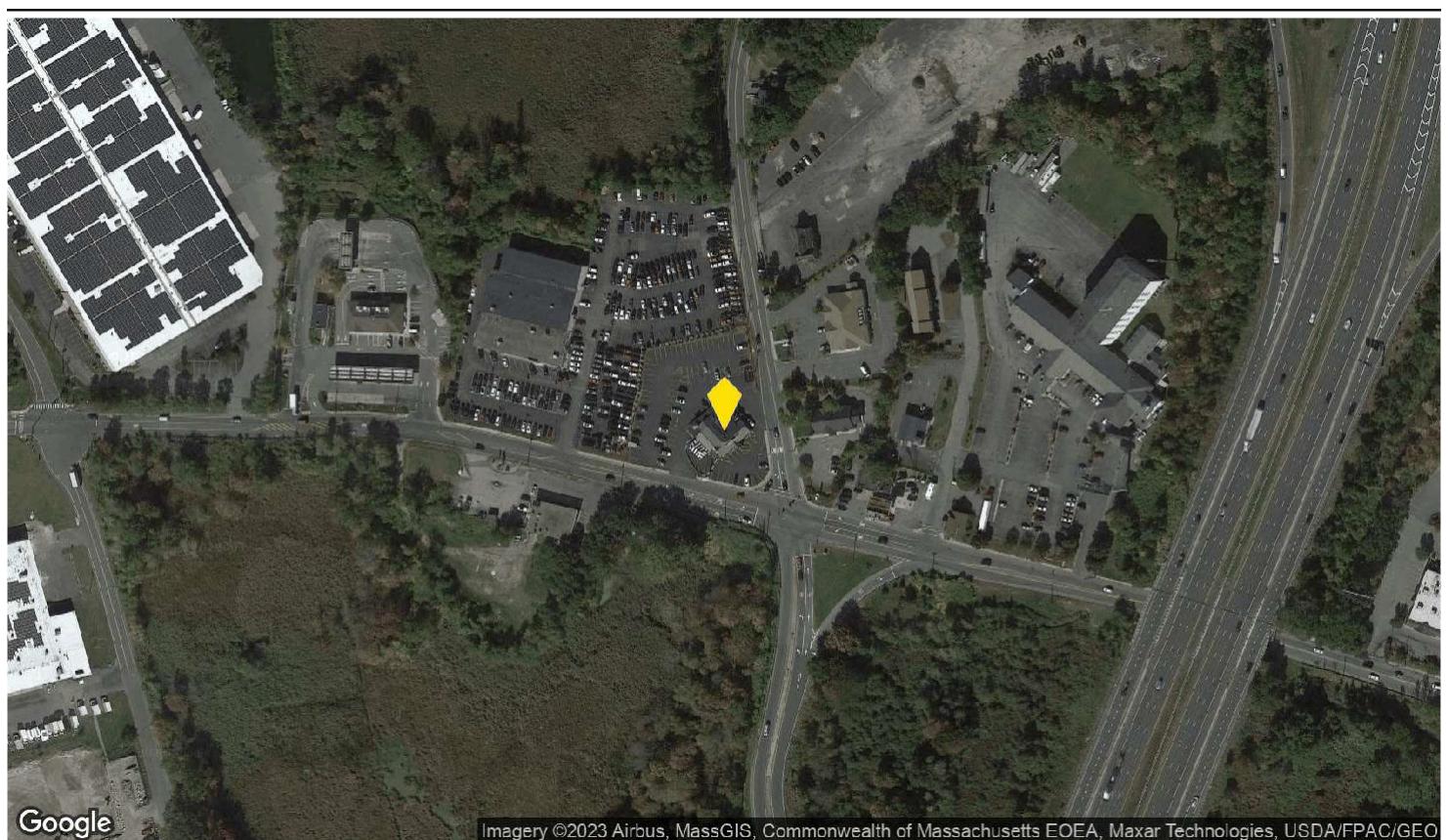


## SITE PLAN



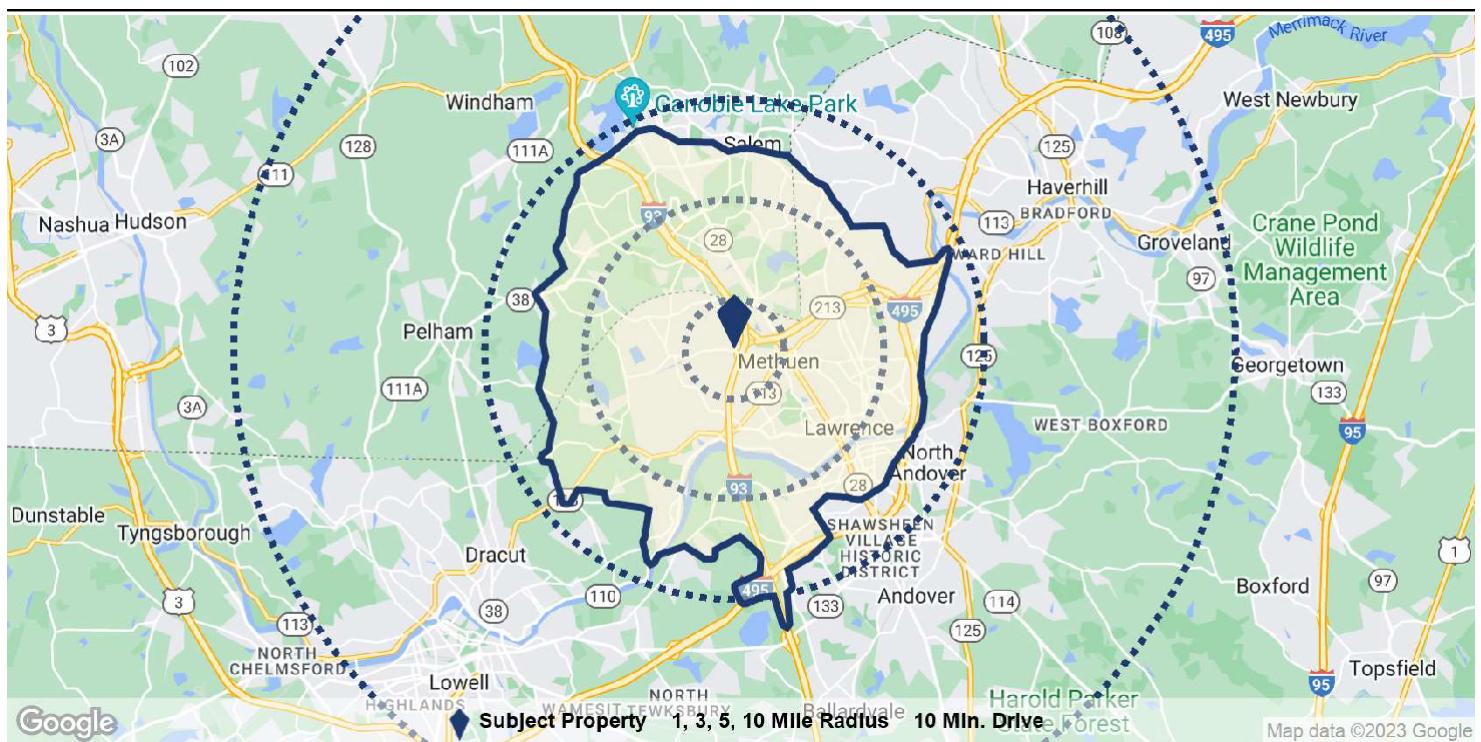


## AERIAL VIEW



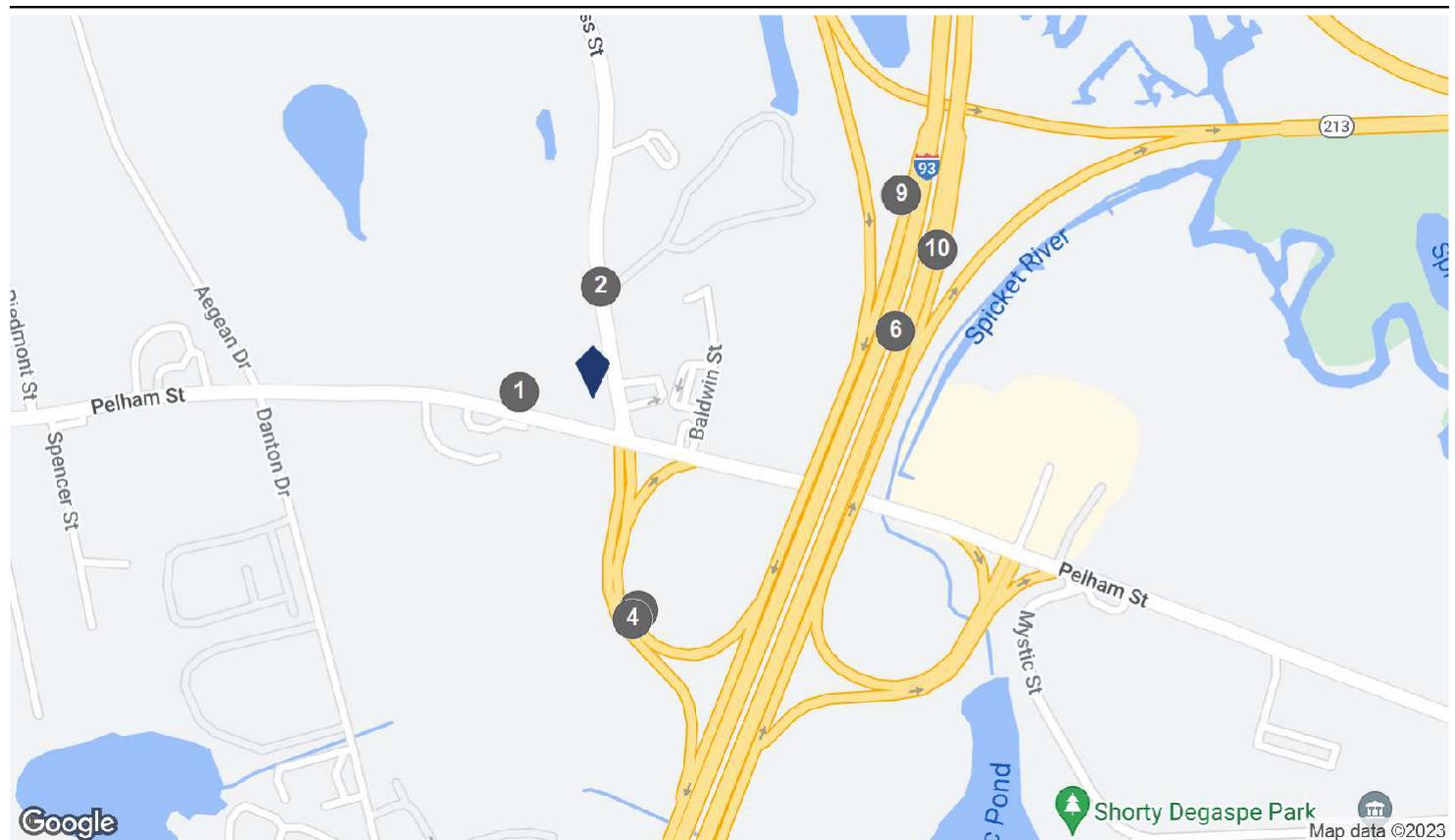
Imagery ©2023 Airbus, MassGIS, Commonwealth of Massachusetts EOEA, Maxar Technologies, USDA/FPAC/GEO

## DEMOGRAPHICS



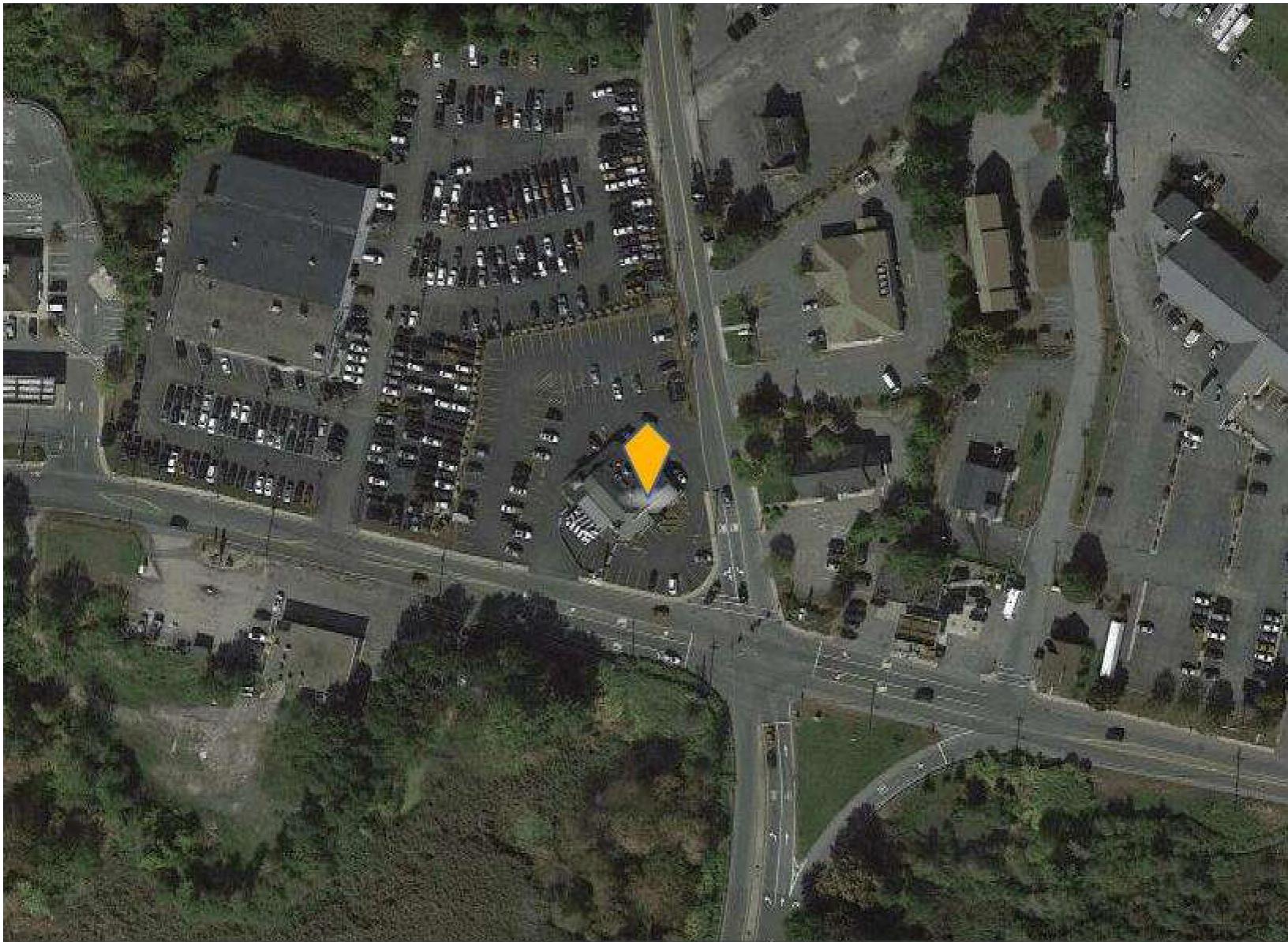
Population	1 Mile	3 Miles	5 Miles	10 Miles	10 Min. Drive
Population	7,170	98,548	194,207	542,819	158,843
5 Yr Growth	2.8%	3.9%	4.5%	3.1%	4.5%
Median Age	40	37	38	39	38
5 Yr Forecast	41	39	40	40	39
White / Black / Hispanic	85% / 6% / 25%	76% / 13% / 58%	78% / 11% / 48%	80% / 7% / 26%	76% / 12% / 55%
5 Yr Forecast	83% / 7% / 28%	76% / 13% / 60%	77% / 11% / 50%	79% / 8% / 27%	76% / 13% / 57%
Employment	4,050	45,271	90,743	231,628	82,039
Buying Power	\$271.2M	\$2.3B	\$5.4B	\$17.4B	\$3.9B
5 Yr Growth	5.0%	6.9%	7.6%	5.4%	7.5%
College Graduates	22.4%	18.4%	23.4%	30.5%	25.4%
<b>Household</b>					
Households	2,843	34,382	69,933	198,374	56,144
5 Yr Growth	3.1%	4.3%	4.7%	3.2%	4.9%
Median Household Income	\$95,388	\$65,786	\$77,010	\$87,681	\$70,163
5 Yr Forecast	\$97,175	\$67,421	\$79,085	\$89,548	\$71,951
Average Household Income	\$110,090	\$88,996	\$99,465	\$112,091	\$92,228
5 Yr Forecast	\$111,929	\$90,643	\$101,306	\$114,042	\$93,960
% High Income (>\$75K)	60%	45%	51%	56%	47%
<b>Housing</b>					
Median Home Value	\$408,603	\$398,135	\$410,618	\$437,186	\$391,520
Median Year Built	1960	1962	1967	1969	1965
Owner / Renter Occupied	65% / 35%	49% / 51%	56% / 44%	63% / 37%	52% / 48%

## TRAFFIC COUNTS



## COUNTS BY STREETS

Collection Street	Cross Street - Direction	Traffic Volume	Count Year	Dist from Subject
① Pelham St	Cross St - E	18,433	2022	0.05 mi
② Cross St	Pelham St - S	8,404	2022	0.06 mi
③ RAMP-RT 93 SB TO PELHAM ST	Baldwin St - N	4,884	2022	0.15 mi
④ RAMP-PELHAM ST TO RT 93 SB	Baldwin St - N	5,551	2022	0.16 mi
⑤ INTERSTATE 93	Pelham St - SW	97,134	2020	0.20 mi
⑥ I- 93	Pelham St - SW	106,918	2022	0.20 mi
⑦ I- 93	State Hwy213 - N	868	2022	0.23 mi
⑧ INTERSTATE 93 SB CD ROAD	State Hwy213 - N	813	2020	0.23 mi
⑨ I- 93	State Rte 213 - N	894	2020	0.23 mi
⑩ INTERSTATE 93 NB CD ROAD	State Hwy213 - N	2,122	2020	0.23 mi



Google Demographics

Imagery ©2023 Airbus, MassGIS, Commonwealth of Massachusetts EOEA, Maxar Technologies, USDA/FPAC/GEO

## 171 Pelham St

7,633 SF Retail Restaurant

Methuen, Massachusetts - Lawrence/Andover Submarket

PREPARED BY



Daniel Weaver

Appraiser





2023 Households by HH Income	1 Mile		3 Miles		5 Miles		10 Min. Drive	
	2,842		34,381		69,934		56,144	
<\$25,000	464	16.33%	7,226	21.02%	12,621	18.05%	11,216	19.98%
\$25,000 - \$50,000	303	10.66%	6,511	18.94%	11,762	16.82%	9,923	17.67%
\$50,000 - \$75,000	371	13.05%	5,252	15.28%	9,877	14.12%	8,485	15.11%
\$75,000 - \$100,000	347	12.21%	4,179	12.15%	8,795	12.58%	7,237	12.89%
\$100,000 - \$125,000	368	12.95%	3,237	9.42%	7,247	10.36%	5,479	9.76%
\$125,000 - \$150,000	406	14.29%	2,646	7.70%	5,328	7.62%	3,949	7.03%
\$150,000 - \$200,000	253	8.90%	2,628	7.64%	7,556	10.80%	5,331	9.50%
\$200,000+	330	11.61%	2,702	7.86%	6,748	9.65%	4,525	8.06%
2023 Avg Household Income	\$110,090		\$88,996		\$99,465		\$92,228	
2023 Med Household Income	\$95,388		\$65,786		\$77,010		\$70,163	

Total Specified Consumer Spending	1 Mile		3 Miles		5 Miles		10 Min. Drive	
	\$98.4M		\$1B		\$2.3B		\$1.7B	
Total Apparel	\$5.2M	5.24%	\$60M	5.82%	\$125.2M	5.56%	\$98.7M	5.74%
Women's Apparel	\$2.1M	2.09%	\$22.9M	2.22%	\$48.6M	2.16%	\$37.9M	2.21%
Men's Apparel	\$1.1M	1.07%	\$12.1M	1.17%	\$25.5M	1.13%	\$19.9M	1.16%
Girl's Apparel	\$359.9K	0.37%	\$4.4M	0.42%	\$8.9M	0.39%	\$7.1M	0.41%
Boy's Apparel	\$257.1K	0.26%	\$3.3M	0.32%	\$6.6M	0.29%	\$5.3M	0.31%
Infant Apparel	\$230.3K	0.23%	\$3M	0.29%	\$5.9M	0.26%	\$4.8M	0.28%
Footwear	\$1.2M	1.21%	\$14.4M	1.40%	\$29.7M	1.32%	\$23.6M	1.37%

Total Entertainment & Hobbies	\$13.3M	13.49%	\$135M	13.10%	\$298.9M	13.27%	\$225.6M	13.12%
Entertainment	\$1.5M	1.57%	\$17.3M	1.68%	\$36.7M	1.63%	\$28.7M	1.67%
Audio & Visual Equipment/Service	\$3.3M	3.39%	\$35.9M	3.49%	\$77M	3.42%	\$59.7M	3.47%
Reading Materials	\$211.9K	0.22%	\$1.9M	0.18%	\$4.5M	0.20%	\$3.2M	0.19%
Pets, Toys, & Hobbies	\$2.5M	2.53%	\$22.4M	2.17%	\$51.6M	2.29%	\$37.9M	2.20%
Personal Items	\$5.7M	5.79%	\$57.4M	5.57%	\$129.2M	5.74%	\$96M	5.58%

Total Food and Alcohol	\$26.7M	27.13%	\$299.8M	29.09%	\$637.3M	28.28%	\$496.5M	28.87%
Food At Home	\$13.9M	14.08%	\$163.5M	15.86%	\$340.1M	15.09%	\$268.6M	15.62%
Food Away From Home	\$11M	11.13%	\$116.8M	11.33%	\$254M	11.27%	\$195.1M	11.34%
Alcoholic Beverages	\$1.9M	1.92%	\$19.6M	1.90%	\$43.2M	1.92%	\$32.8M	1.91%

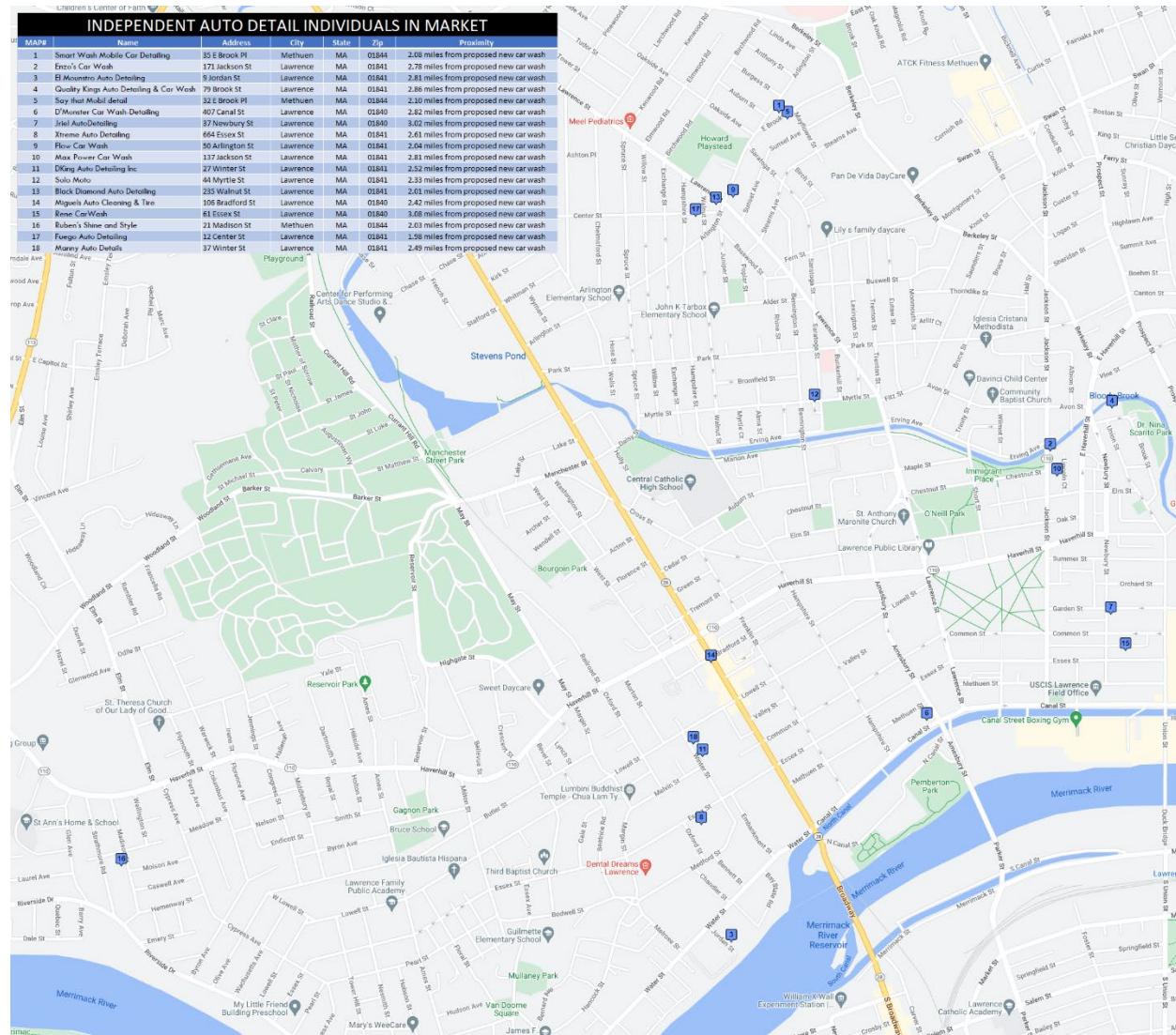
Total Household	\$16.6M	16.84%	\$162.6M	15.78%	\$369M	16.38%	\$274.7M	15.97%
House Maintenance & Repair	\$3.5M	3.54%	\$31.6M	3.06%	\$73.5M	3.26%	\$53.8M	3.13%
Household Equip & Furnishings	\$6.3M	6.37%	\$63.3M	6.15%	\$141.4M	6.27%	\$106.9M	6.21%
Household Operations	\$4.8M	4.91%	\$49M	4.75%	\$109.9M	4.88%	\$82.1M	4.77%
Housing Costs	\$2M	2.02%	\$18.7M	1.82%	\$44.2M	1.96%	\$31.8M	1.85%

	1 Mile		3 Miles		5 Miles		10 Min. Drive	
	\$25.5M	25.91%	\$261.9M	25.41%	\$569.3M	25.27%	\$436.7M	25.39%
Total Transportation/Maint.								
Vehicle Purchases	\$12.6M	12.83%	\$122.5M	11.89%	\$268.3M	11.91%	\$204.8M	11.91%
Gasoline	\$5.9M	5.99%	\$66.4M	6.44%	\$139.6M	6.20%	\$109.6M	6.38%
Vehicle Expenses	\$646.8K	0.66%	\$6.9M	0.67%	\$15.8M	0.70%	\$11.7M	0.68%
Transportation	\$3.2M	3.24%	\$33.6M	3.26%	\$75M	3.33%	\$56.4M	3.28%
Automotive Repair & Maintenance	\$3.1M	3.19%	\$32.4M	3.14%	\$70.6M	3.13%	\$54.1M	3.14%
 Total Health Care	 \$4.6M	 4.70%	 \$47.1M	 4.57%	 \$104.3M	 4.63%	 \$78.7M	 4.58%
Medical Services	\$2.8M	2.83%	\$28.4M	2.75%	\$63M	2.79%	\$47.5M	2.76%
Prescription Drugs	\$1.3M	1.35%	\$13.3M	1.29%	\$29.5M	1.31%	\$22.2M	1.29%
Medical Supplies	\$513K	0.52%	\$5.4M	0.53%	\$11.9M	0.53%	\$9.1M	0.53%
 Total Education/Day Care	 \$6.6M	 6.69%	 \$64.3M	 6.24%	 \$149.1M	 6.62%	 \$109.1M	 6.34%
Education	\$4.1M	4.16%	\$40.7M	3.94%	\$94M	4.17%	\$69M	4.01%
Fees & Admissions	\$2.5M	2.53%	\$23.6M	2.29%	\$55.1M	2.45%	\$40.1M	2.33%

# **EXHIBIT 3**

## A Deeper Dive Into the Possible Negative Impacts to the Local Minority Community:

As the following maps and illustrations show, the 3-mile radius surrounding the proposed site is predominately lower income and/or minority families. The auto detailers in the area are shown on the map below. As can be seen, there are 18 within less than three miles of the proposed wash. These are very small businesses, typically employing 1-5 employees.

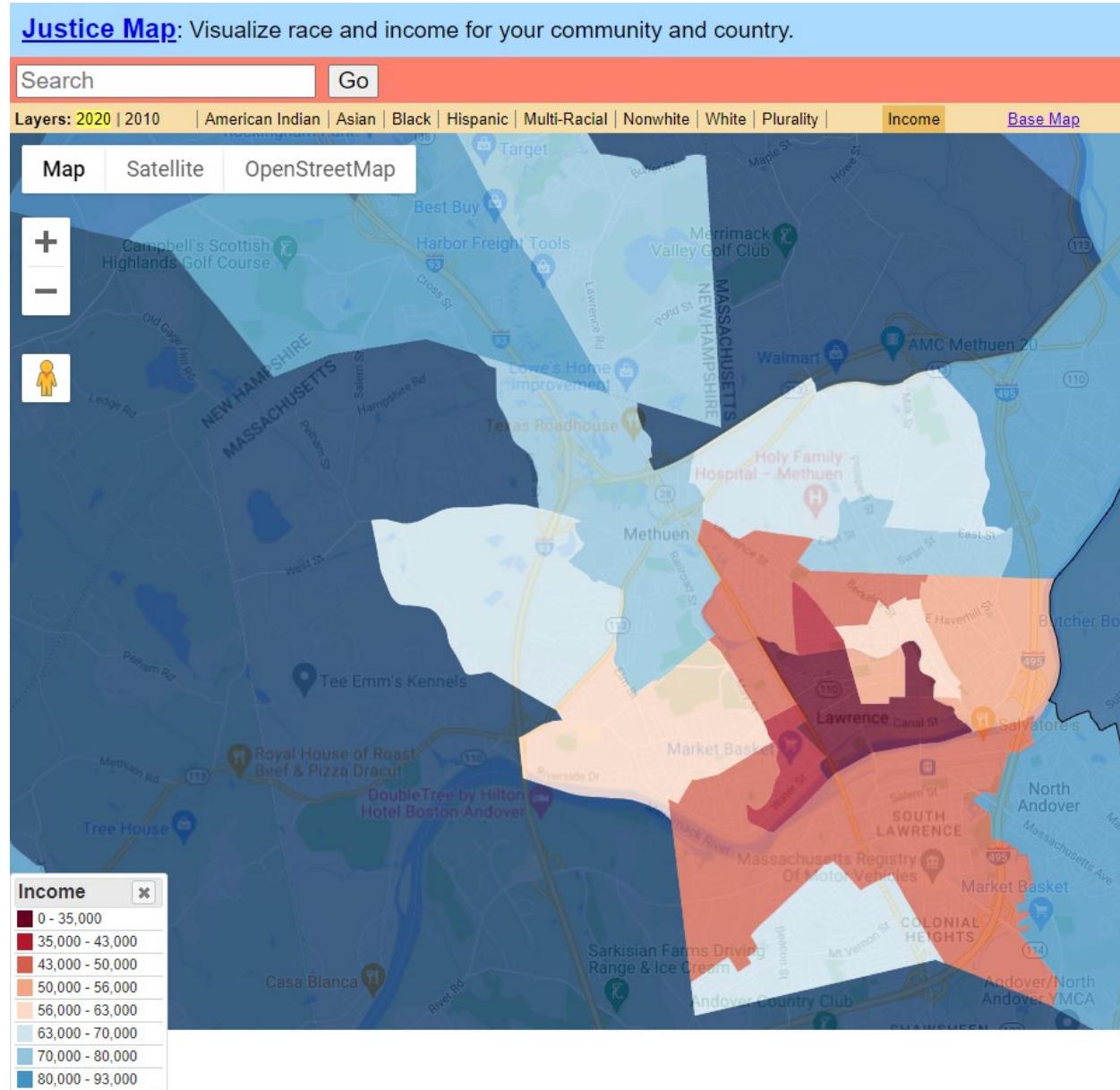


The proposed development, while promising in terms of its potential to serve the car wash market, raises critical concerns regarding its impact on the existing auto detailing businesses, particularly those owned by minorities, within the immediate vicinity. There are 18 auto detailing companies located within less than three miles of the proposed site, with a significant concentration to the southeast in areas characterized by lower median incomes and a high minority population.

The establishment of a new car wash facility in this already competitive landscape could potentially exacerbate the challenges faced by these existing minority-owned auto detailing businesses. These

businesses are often operating on thinner profit margins and may not have the resources to withstand heightened competition. The risk of these businesses closing down could lead to a detrimental impact on the local economy, as vacant buildings in these areas can contribute to blight and hinder community development efforts.

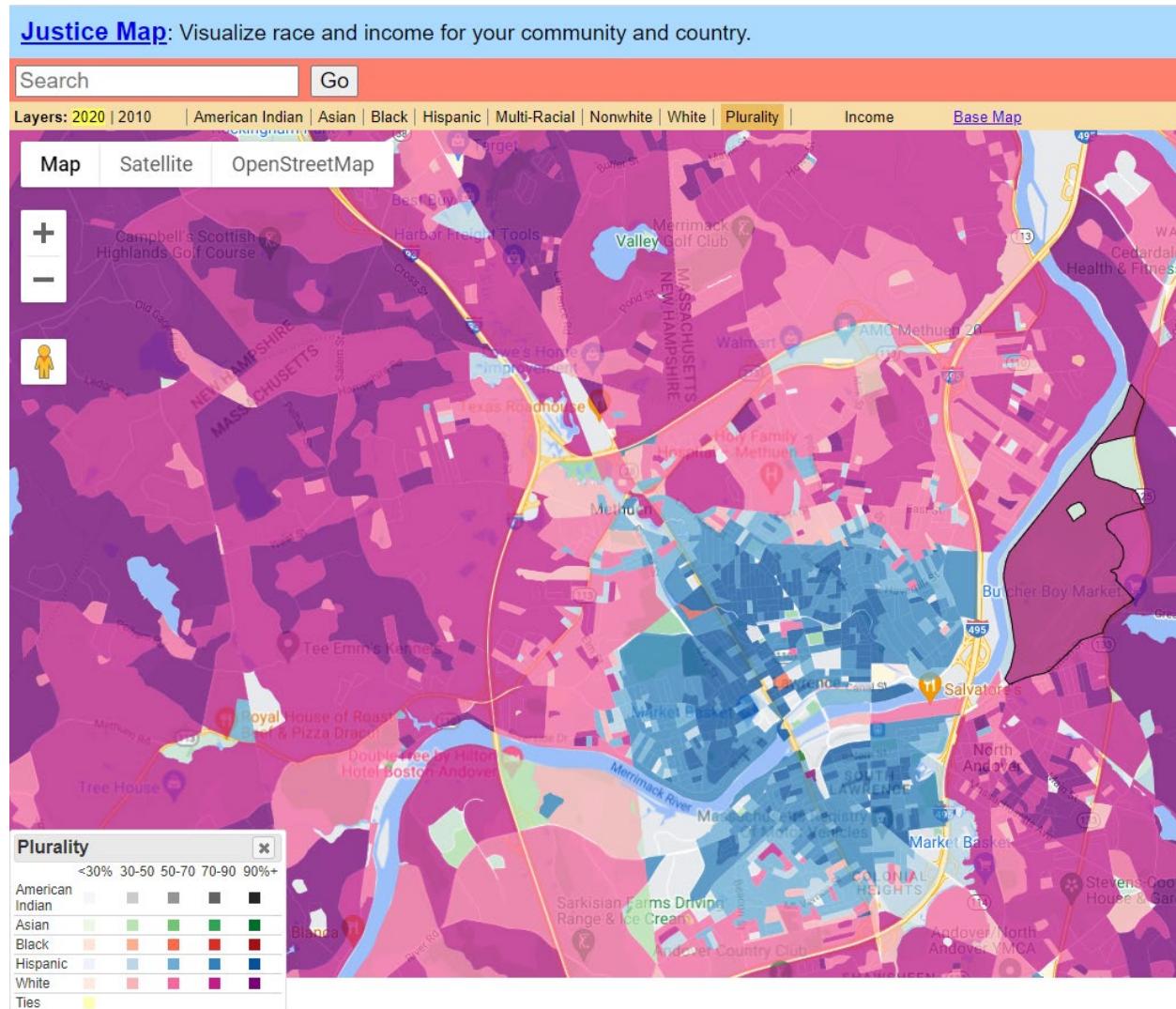
Presented below is the income heat map, offering a visual representation of income distribution within the vicinity of the proposed development site. This map provides valuable insights into the economic landscape, highlighting areas with varying income levels and offering a context for assessing the potential impact of the proposed project on the local community.



City officials should carefully consider these factors before approving the proposed development. A comprehensive assessment of the potential impact on existing businesses, particularly minority-owned enterprises, is crucial. Strategies to support and potentially integrate these businesses into the evolving

market landscape should be explored. Balancing economic growth with the preservation of existing businesses and the well-being of the community should be a central consideration in the decision-making process.

Presented below is the plurality heat map, which serves as a visual representation of the racial demographics in the vicinity of the proposed development site. This map offers a comprehensive view of the distribution of ethnicities within the area, providing essential context for understanding the potential implications of the proposed project on the diverse community it serves.



I pondered why Methuen would care if they displaced minority owned businesses in the more poverty-stricken areas of Lawrence. While I understand that raising the tax base can be a desirable goal for a city like Methuen, it's essential for them to consider a broader perspective when evaluating the impact of a proposed development. The city of Methuen should care about the potential repercussions on minority-owned businesses in Lawrence for several reasons:

**Economic Interconnectedness:** Cities within close proximity often have intertwined economies.

Disrupting businesses in neighboring Lawrence could have ripple effects that impact Methuen's own economic stability. A thriving regional economy benefits all communities within the region.

**Community Well-Being:** The well-being of residents in both cities is interrelated. A loss of livelihoods in Lawrence could lead to negative social consequences that may affect not just Lawrence but also neighboring Methuen, such as **increased unemployment and social service needs.**

**Long-Term Viability:** A sustainable and thriving business environment is essential for the long-term viability of any community. If minority-owned businesses in Lawrence face difficulties or closure due to increased competition, **it may deter potential entrepreneurs and investors from choosing the region for future endeavors.**

**Social Responsibility:** Cities have a responsibility to consider the broader social and ethical implications of their decisions. Prioritizing economic growth at the expense of minority-owned businesses can raise concerns about social equity and inclusivity, which are vital aspects of a just and thriving community.

**Public Perception:** The perception of a city as a responsible and considerate community can affect its overall image. A city that shows concern for the well-being of its neighbors and promotes a harmonious regional environment is likely to be viewed more favorably by residents and potential investors.

In summary, while increasing the tax base is a legitimate goal, it should be pursued with a comprehensive understanding of the interconnectedness of neighboring communities and the broader social and ethical responsibilities of city officials. Balancing economic growth with the well-being of all residents, including those in neighboring areas, is a key consideration for sustainable and responsible urban planning.

Respectfully,

*Julio Fuentes*

Julio Fuentes, CFA -Methuen Business Community Member

*Dan Talbot*

Dan Talbot - Methuen Business Community Member

## About Justicemap.com

Heat maps for income and racial composition was assembled from Justicemap.org. Justicemap.org is a website that provides a platform for mapping and visualizing various socio-economic and demographic data, including information related to income, race, and environmental justice issues. It allows users to explore and analyze data using interactive maps and tools, making it a valuable resource for researchers, policymakers, and the general public interested in understanding and addressing social and environmental disparities.

Justicemap.org is funded by Energy Justice Network. The Energy Justice Network is an advocacy organization with a mission focused on addressing social and environmental justice issues related to energy production and distribution. Their primary goal is to promote a transition to a more sustainable and equitable energy system by advocating for clean and renewable energy sources, as well as raising awareness about the disproportionate impacts of fossil fuel extraction and energy infrastructure on marginalized communities.

The data sources cited on Justicemap.org include the 2010 and 2020 US Census for race and density data, as well as income data from the American Community Survey (specifically, the 2014-2018 5-year summary). The website also mentions the use of Census Bureau data, both directly and via the Dexter extraction tool from the Missouri Census Data Center. Additionally, there is a note cautioning against using the Income Block layer in Advanced mode for research or serious analysis, as it is based on a smoothing and estimating algorithm created by the website's creator.

The reliability of Justicemap.org as a source for mapping income and race demographics of a community can be assessed based on several factors:

**Data Sources:** Justicemap.org primarily relies on official US Census and American Community Survey data, which are reputable and widely used sources for demographic information. This lends credibility to the data presented on the website.

**Transparency:** The website is transparent about the sources of its data, including the Income Block layer's speculative nature. Transparency about data sources is a positive indicator of reliability.

**Cautionary Note:** The website includes a disclaimer regarding the use of certain layers for research or serious analysis, indicating a commitment to providing accurate information and guiding users appropriately.

**Cross-Referencing:** To ensure the reliability of the data, users should consider cross-referencing information from Justicemap.org with data from other authoritative sources, especially when conducting in-depth research or analysis.

Overall, Justicemap.org can be considered a reliable starting point for mapping income and race demographics, particularly for gaining a broad understanding of community-level data. However, for more comprehensive or research-focused purposes, it's advisable to corroborate the information with data from official government sources or academic research.

# **EXHIBIT 4**

Hello Neighbors,

This letter is to bring your attention to a project that is being considered by the Methuen Zoning Board. A special permit and variances have been applied for to build a third car wash on Pelham Street at the current location of Fireside Restaurant, 171 Pelham Street.

This is a real issue and concern for the City and residents of Methuen, especially those with abutting properties, now and in the future. Generally speaking, a carwash succeeds when:

- Surrounding population is large enough to support a carwash- **about 30k people per carwash**
- RULE OF THUMB- **a community can support 1 carwash every 3-mile radius**
- Surrounding population has some discretionary income
- **The operator provides a good quality carwash at reasonable prices**
- Towns and cities can support more than 1 carwash BUT certain factors should be present:
  - The population needs to be significant (about 25-30k people per carwash, so 60k for 2, 90k for 3 car washes, etc.)
  - **AND** ideally, the carwashes are spaced apart from each other with the 3-mile radius rule of thumb in mind

Following the general guidelines above would allow for a community to provide their constituents with this necessary utility which is what it is in places like New England with all of its' winter sand and salt, **without exposing the community to the very serious and costly mistakes of overbuilding and over supplying certain markets.**

#### **The current state of car wash businesses in Methuen:**

- There are currently **several** car washes in operation in Methuen and many more just over Methuen's border (please see the diagram below):
  - Carwashes directly in Methuen:
    - Wash, Wax and Wheels Car Wash – 2 Baldwin Street
    - Merrimac Laundromat and Car Wash – 21 Burnham Rd
    - Circle K Car Wash – 181 Pelham Rd
    - Haffner's Gentle Touch Car Wash – 96 Pleasant Valley St
    - Washville Car Wash – Broadway St
- **There are two car washes currently operating directly to the left and to the right of the proposed location (Circle K and Wash, Wax and Wheels)**
- Also there is **currently a car wash being constructed on Rt 28 in Methuen 0.8 miles from the proposed location.** This is going to be a tunnel car wash, similar to what is being proposed at the 171 Pelham location. This wash is expected to be operational November 2023

#### Some of the concerns raised by carwash over supply and location concentration:

- Carwashes are real estate related businesses which are typically located in marquee, high traffic, commercial areas... **always lots of eyeballs on these types of properties**
- Carwashes require very unique equipment and a very unique building. This expensive equipment and expensive building have **ZERO alternative use**... the land does.
- If too many (even) good operators are forced or allowed to operate without adequate market demand, either due to lack of population or over-concentration of capable carwash operators in a small area, then a community can expect that one or more of the operators (despite being "good" operators) will **begin to lose profitability which will lead to less investment in the business and the property** (the quality of the property is part of the

carwash business), which will lead to even less profitability, etc.... with the end result being the failure of what was otherwise a well-run business before the pie was divided by too many operators... **this dynamic creates all sorts of explicit and implicit potential costs to the community:**

- The carwash properties slowly start to be an eyesore
- As the carwash properties become an eyesore more neighbors complain **due to its effects on their businesses**
- As the carwash properties become an eyesore more neighbors complain **due to its effects on their property values**
- Giving the use, **lots of expensive environmental and soil testing** must be done to transition the use of this failed business to the next owner and use
- **Clean-up is very expensive.** Given the unique equipment and building there are no alternative uses. This demolition and clean-up increase the cost to transition the property to the next owner and use. This is not simply re-leasing fungible retail space in a strip mall... **this is far more complicated and expensive**
- Additionally, due to the high competition in that specific area, **seasoned carwash operators will have little to no interest** in expanding into that market via that dying property.
- For the reasons above, these tired, dying eyesores **typically take years to transition to new use and ownership...** meanwhile, the entire community may suffer from what is an avoidable situation.
- Additional Factors to consider:
  - Having multiple carwashes in close proximity doesn't necessarily increase overall carwash sales. You might buy 2 t-shirts from 2 different stores today but you are not getting your car washed twice in 1 day from carwashes across the street from one another. **The carwashes SPLIT the community's business... they don't grow it. Over permitting them is a real risk to ALL operators and the community.**
  - In New England about 50% of carwash sales occur on the weekend, when people are doing other chores. If all carwashes in a community are on the same road there could **be very real traffic issues on the weekend.**
  - Unsubstantiated supply growth can destroy the economic values (net wealth) of existing good operators, many of whom have been valued contributing members of Methuen for years. **For a good operator, the value of the carwash business is worth far more than the value of the underlying real estate. It is this value that gets destroyed with over permitting.**
  - Over permitting carwashes in a small geographic location could also **unnecessarily tax a city's sewer and water systems in those areas.**

### **What can you do?**

There is a public hearing at October 25<sup>th</sup> at 7pm. All are welcome to listen and also share their comments on this project. If you are concerned about this proposal, we encourage you to attend this meeting and to share your concerns with the Zoning Board.

### **The meeting will be held at:**

Methuen Community TV Studios  
20 Aegeon Drive, Unit 11

Methuen, MA

10/25/23 at 7:00PM

If you cannot make it to the meeting but would like to provide written comments in advance of the meeting you may drop comments off at the City Hall, 41 Pleasant Street, Searles Building Unit 203 on the 2<sup>nd</sup> floor or call the inspections office at 978-209-1131.

The Existing Car Wash Services Market is Already Overcrowded:

