

December 29, 2025

Mr. Stephen G. Pernaw, P.E.  
Stephen G. Pernaw & Company, Inc.  
P.O. Box 1721  
Concord, NH 03302

**Re: Proposed Reuse of Former Sears Auto Center  
Langan Project #151064501**

Dear Mr. LaFontaine:

Enclosed please find our responses to your letter dated December 19, 2025. Below please find each comment followed by our response in **bold**.

1. It is not clear if the outdoor seating is included in the 337 seat total, as this could affect all study projections.

**COMMENT RESPONSE:** *Outdoor seating is included in the 337 total seat count. A clarification has been added to the project description.*

2. ITE description for LUC 932 does not necessarily reflect bowling lanes, pool tables, arcades, and a dancing venue...using "seats" rather than the "gross floor area" as the independent variable produced the lowest estimates...we believe it is prudent to rely on the higher GFA-based estimates for planning purposes (Estimate C).

**COMMENT RESPONSE:** *We first attempted to use LUC 437 (Bowling Alley) to produce a parking demand rate but found that the land use generates very low parking demand. LUC 932 was determined to be the best fit for this development, as both "Game On!" and "Loretta's Last Call" will serve food and have table seating for customers. "Seats" was chosen to be the independent variable, as "Game On!" has large spaces that are not occupiable such as the 10 proposed bowling lanes within the establishment. Using square footage for the independent variable in this situation would produce overly conservative parking demand estimates, and it is our opinion that Alternate Estimate C is an overestimation.*

3. The results reflect average parking demand rather than the 85th percentile parking demand

**COMMENT RESPONSE:** *The report has been amended to include both average and 85<sup>th</sup> (peak) parking demand presented in Tables 1 and 2.*

Key Finding 1: *"Existing parking demand in Parking Lot C peaks at 28% utilization on Friday and 27% on Saturday in the evenings."*

SGP Comment: This finding pertains to July 2025 conditions, and does not reflect peak-month conditions.

**COMMENT RESPONSE:** *Confirmed, no comment.*

Key Finding 2: "The combination of existing parking utilization and anticipated parking demand would be less than 50% utilization of Parking Lot C during off-peak season."

SGP Comment: According to the Alternative Estimate C, the utilization of Lot C could be on the order of 65% during July conditions.

**COMMENT RESPONSE: Using 85<sup>th</sup> percentile parking demand, the utilization of Lot C is estimated to be 53%. This is matches with Alternative Estimate A. The independent variable of seats was maintained due to the reasoning outlined in the response for Comment #2.**

Key Finding 3: "The Mall will require an amended Conditional Use Permit (CUP) to reduce the required parking to 4,563 to account for the removal of 16 parking spaces for the proposed restaurants."

SGP Comment: We do not have sufficient documentation to verify that the required parking is 4,563 spaces. However, the removal of 16 parking spaces for the proposed restaurants is considered de minimis.

**COMMENT RESPONSE: Comment acknowledged.**

Key Finding 4: "The estimated trip generation for the proposed restaurants is 26 less evening peak hour trips and 549 daily trips less than the previous proposals."

SGP Comment: The alternative trip estimates for the PM peak hour case range from 155 to 179 trips. When compared to the previous proposal estimate of 158 trips, it is reasonable to expect anything from a minor decrease to a small increase in trips. The weekday daily estimate on Table 2 (1,473 trips) should be used with caution, as this estimate is based on only one ITE data point. The weekday daily estimate for the two restaurants based on the 12<sup>th</sup> Edition (and the total GFA) results in an estimate of 2,023 trips (5 ITE data points). According to Table 2, the previously approved restaurant/retail uses generated 2,022 trips; essentially a "wash;" not a reduction.

**COMMENT RESPONSE: As reasoned in the response for Comment #2, it is our opinion that "seats" is a more appropriate independent variable to use for this development due to the large unoccupiable space taken up by the proposed bowling lanes. Therefore, we believe that the proposed development is expected to generate less peak hour and daily trips.**

CUP Request – It is our understanding that the request is for the removal of 16 parking spaces for the proposed restaurant project. Given that the required parking supply for the Mall exceeds four thousand spaces, 16 fewer spaces is considered de minimis.

**COMMENT RESPONSE: Comment acknowledged.**

Site Development Plan – A vehicle tracking analysis should be prepared that demonstrates: 1) compatibility with Salem fire apparatus, and 2) how the dumpsters will be serviced. According to Sheet CS101, 68 spaces are proposed within the subject site. It should be noted that the peak parking demand estimates range from 158 to 395 occupied spaces. This means that there is the

potential for the entire C1 parking section (with 373 net spaces) to be fully occupied during peak periods.

**COMMENT RESPONSE: Vehicle turning movement demonstrations are provided on Sheets TM101 and TM102. The 85<sup>th</sup> percentile (peak) parking estimates for Loretta's and Game On! are 266 spaces, which is 71% of the available parking spaces within Lot C1.**

Traffic Impact Fee – The Applicant should submit an impact fee calculation for Town review based on the current version of the “*Impact Fees For New Development*” schedule. The current rate for high-turnover restaurants is \$5.89 per sf. The impact fee calculation should reflect a “credit” for the former use (auto center).

**COMMENT RESPONSE: See the attached impact fee calculation.**

Sincerely,  
**Langan Engineering and Environmental Services, Inc.**



Christopher McLean  
Project Engineer

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<b>Impact Fee Calculation Table</b>					
	<b>Existing</b>		<b>Proposed</b>		
	Square Footage	\$/SF	Square Footage	\$/SF	
Sears Auto Center (Small Retail)	19,900	\$ 5.57	-		
Loretta's Last Call & Game On! (High-Turnover Sit Down Restaurant)	-		19,900	\$ 5.89	
Estimated Impact Fee	\$ 110,843.00		\$ 117,211.00		
<b>New Impact Fee</b>	<b>\$ 6,368.00</b>				