

Emerson Green Residences

Why 46 homes and 79 bedrooms need 83 parking spaces, and why 23 additional spaces put the community where it needs to be.

46

Dwelling units
17 one-bed · 25 two-bed · 4 three-bed

79

Bedrooms
the true driver of vehicle demand

60 → 83

Parking spaces
approved → proposed (+23)

EXECUTIVE SUMMARY

The request, in one page

77 Grant Road LLC respectfully requests a modification of the Emerson Green Residences Unified Permit to add **23 surface parking spaces**, increasing the on-site supply from 60 to 83 spaces for the permitted 46-unit multifamily building.

The approved supply works out to **1.30 spaces per unit** and just **0.76 spaces per bedroom**. Measured against the applicant's own operating experience, and national parking-demand data, that supply is too low for a community of this size and unit mix, and it would be expected to push resident and guest vehicles onto Marshall Lane, Marshall Street, and Grant Road.

0.76

Approved spaces per bedroom: the lowest of 11 data points in the applicant's parking study

113–124%

Projected peak lot occupancy with 60 spaces, using ITE national demand rates

82–90%

Projected peak occupancy with 83 spaces: inside the industry's practical-capacity range

1.19

Spaces per bedroom across the 9 comparable communities combined; the proposal is 1.05

What the evidence shows

- 1 Bedrooms, not units, drive parking demand.** A two-bedroom apartment is frequently home to two working adults with two cars. Emerson Green averages 1.72 bedrooms per unit, more than the 1.58 average across the nine comparable communities studied.
- 2 The approved supply is the lowest in the study by a wide margin.** At 0.76 spaces per bedroom it sits 25% below the lowest comparable community (1.01), and that community already has residents parking in the street.
- 3 National data says 60 spaces will fill up.** ITE's peak-demand rates for suburban multifamily housing not near rail transit predict 68–75 parked vehicles at Emerson Green, more cars than the approved lot can hold.
- 4 83 spaces is a right-sized, conservative correction.** It matches ITE peak demand plus a standard 10% operating cushion, and it stays below both the comparable median and the applicant's own 1.2-per-bedroom benchmark.

SECTION 1 · THE COMMUNITY

A family-sized building needs family-sized parking

Emerson Green Residences is a permitted 46-unit multifamily building at 77 Grant Road, within the Emerson Green neighborhood. Its unit mix leans toward larger homes: more than half the units have two or more bedrooms, and four are three-bedroom homes.

UNIT TYPE	UNITS	SHARE OF UNITS	BEDROOMS	SHARE OF BEDROOMS
One-bedroom	17	37%	17	22%
Two-bedroom	25	54%	50	63%
Three-bedroom	4	9%	12	15%
Total	46	100%	79	100%

Why we measure parking per bedroom

Parking codes traditionally count dwelling units, which treats a one-bedroom apartment and a three-bedroom apartment as the same parking load. In practice they are not. As the applicant has built and operated multifamily communities across central Massachusetts, it has consistently found that vehicle counts track the number of bedrooms far more closely than the number of front doors. Two-bedroom units are commonly leased to couples who each commute, to roommates, or to families with a teenage driver. Each additional bedroom is, in effect, an additional potential driver.

This is also how the Institute of Transportation Engineers (ITE) reports demand: its *Parking Generation Manual* publishes multifamily rates both per dwelling unit and per bedroom, and the per-bedroom rate scales directly with unit size.

Nearly four out of five bedrooms at Emerson Green are in two- and three-bedroom homes. That is where the vehicles come from.

Devens is a driving community

Emerson Green is in a general suburban setting, well over half a mile from the nearest commuter rail station in downtown Ayer. Public transit in Devens consists of MART's scheduled weekday shuttle connecting to the Fitchburg Line in the morning and evening, and an on-demand service that generally must be reserved a day in advance. These services are valuable, but they do not substitute for a household car for everyday trips to work, school, groceries, and childcare. For planning purposes, ITE classifies sites like this as “not close to rail transit,” the category with the highest multifamily parking demand.

SECTION 2 · THE APPLICANT'S PARKING STUDY

What nine operating communities tell us

To set parking targets for its own projects, the applicant surveyed nine multifamily communities in central and eastern Massachusetts, totaling 1,264 units and 1,991 bedrooms. For each, it recorded units, bedrooms, parking supply, and how the parking actually performs day to day.

COMMUNITY	UNITS	BEDS	SPACES	PER BED	PER UNIT	UNIT MIX	OBSERVED
Cobblestone Village Millbury	72	132	162	1.23	2.25	Heavy 2-bed, no 3-bed	Good ratio
Brookside Boylston	66	70	107	1.53	1.62	Heavy 1-bed, no 3-bed	Additional spaces
19 Canal Millbury	59	73	110	1.51	1.86	Heavy 1-bed, no 3-bed	Additional spaces
Trailside Boylston	63	91	110	1.21	1.75	Mix 1/2/3-bed	Very few empty spaces
Edgemere Shrewsbury	250	384	387	1.01	1.55	Heavy 2-bed, no 3-bed	Cars parking in the street
Wallcott Farms Marlborough	140	220	280	1.27	2.00	Mix 1/2/3-bed	Good ratio
Powder Mill Acton	230	389	459	1.18	2.00	Mix 1/2/3-bed	—
Rice Rd Millbury	192	306	347	1.13	1.81	Mix 1/2/3-bed	—
Snow Rd Grafton	192	326	404	1.24	2.10	Mix 1/2/3-bed	—
Emerson Green As approved	46	79	60	0.76	1.30	Mix 1/2/3-bed	Lowest in study
Emerson Green As proposed	46	79	83	1.05	1.80	Mix 1/2/3-bed	Requested
Comparable portfolio 9 communities	1,264	1,991	2,366	1.19	1.87		

Ratios are spaces ÷ bedrooms and spaces ÷ units, recalculated from the raw counts. Source: applicant's multifamily parking matrix.

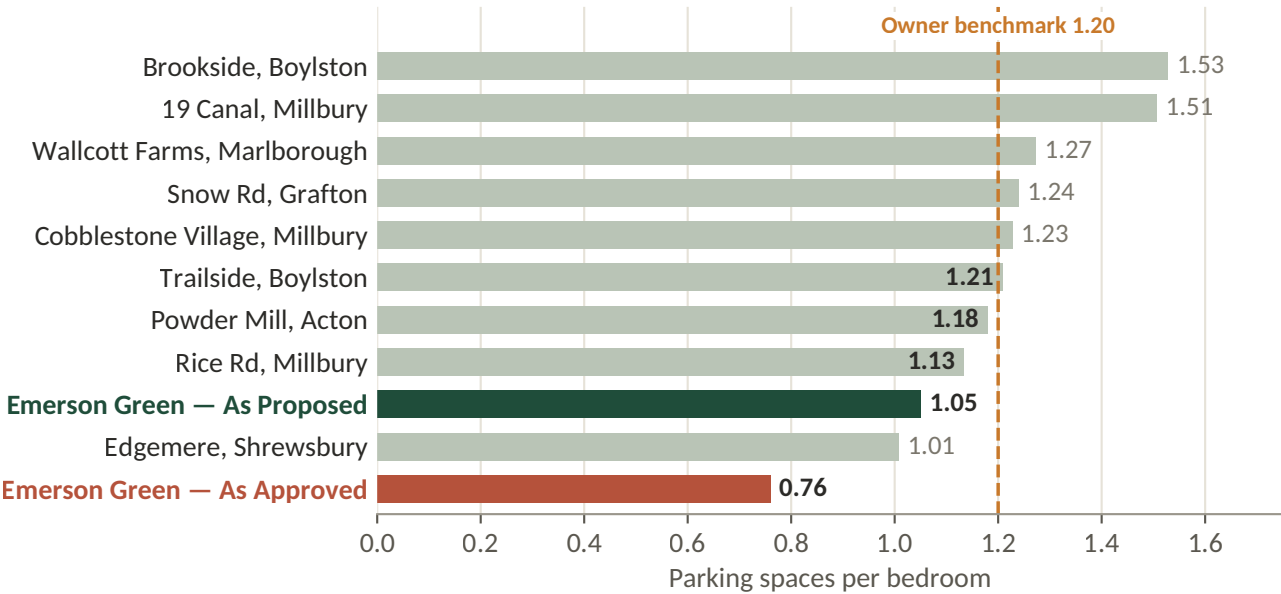


Figure 1. Parking spaces per bedroom. The approved plan is the lowest ratio in the study. Even as proposed, Emerson Green would still sit near the bottom of the range.

What the study shows

- A** **Around 1.2 spaces per bedroom is where parking starts to work.** Across all nine communities combined, supply averages 1.19 spaces per bedroom; the median community provides 1.23. Communities at or above this level are the ones the applicant describes as having a good ratio or spare spaces.
- B** **Below it, problems show up.** Edgemere in Shrewsbury provides 1.01 spaces per bedroom, and residents there park in the street. Trailside in Boylston, at 1.21, has very few empty spaces on a typical day.
- C** **Emerson Green as approved is far outside the range.** At 0.76 per bedroom, it is 25% below Edgemere, the community already experiencing overflow, and 38% below the study median.

The takeaway: The applicant's working benchmark is 1.2 spaces per bedroom, which would be 95 spaces here. The applicant is requesting less than that. At 83 spaces (1.05 per bedroom), Emerson Green would still be among the most parking-efficient communities in the study, while moving out of the zone where overflow parking is a near certainty.

SECTION 3 • NATIONAL STANDARDS

What national parking data predicts

The most widely used national reference for parking demand is the ITE *Parking Generation Manual*, which compiles observed peak parking counts from thousands of sites. For multifamily housing in general urban/suburban settings not close to rail transit, the 5th Edition's 85th-percentile peak demand rates are:

ITE RATE (LOW-RISE MULTIFAMILY, NOT NEAR RAIL)	WEEKDAY	SATURDAY	EMERSON GREEN RESULT
Vehicles per bedroom	0.86	0.88	68–70 vehicles
Vehicles per dwelling unit	1.52	1.62	70–75 vehicles

The corresponding mid-rise rates are similar (0.77–0.87 per bedroom; 1.33–1.47 per unit).

Demand is not the same as supply

ITE rates describe how many cars are parked at the peak moment. A parking lot cannot operate at 100% of its spaces: drivers need open stalls to find, residents come and go, guests arrive, and in New England snow storage takes spaces out of service. Parking professionals treat a lot as functionally full at **85–95% occupancy**. Supply is therefore sized to keep peak occupancy within that range, typically a 5–15% cushion above demand.

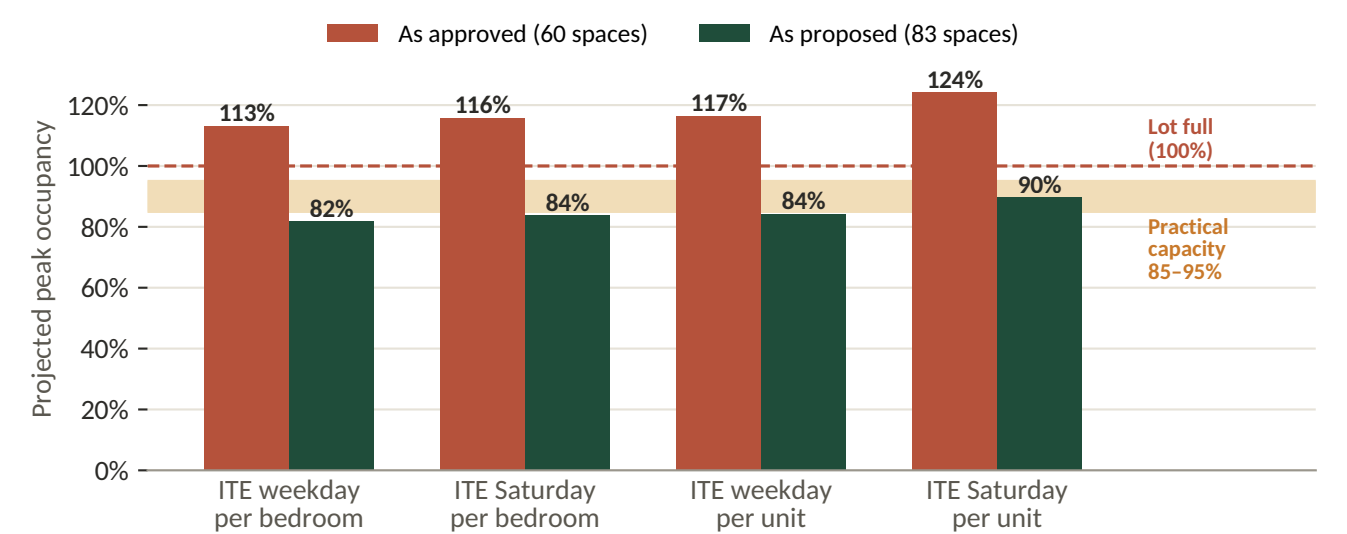


Figure 2. Projected peak occupancy under ITE demand scenarios. With 60 spaces, every scenario exceeds 100%, meaning more cars than stalls. With 83 spaces, peak occupancy falls to 82–90%, within the practical-capacity range.

Put simply: even using national averages that do not account for Emerson Green's bedroom-heavy mix, the approved lot would be overfilled by 8 to 15 vehicles at peak. The highest ITE scenario (75 vehicles) plus a 10% operating cushion equals exactly **83 spaces**.

SECTION 4 • PUTTING IT TOGETHER

Every benchmark points above 60

Looking at parking per dwelling unit, the more traditional way of measuring it, tells the same story as the per-bedroom analysis. The approved 1.30 spaces per unit is the lowest of any community in the study. The proposed 1.80 would place Emerson Green near the middle of the comparable range, below the median of 1.86.

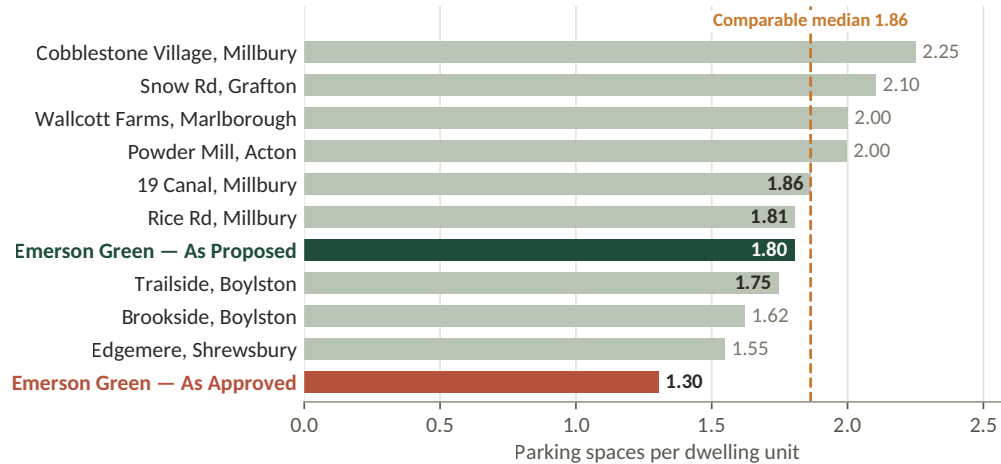


Figure 3. Parking spaces per dwelling unit. On a per-unit basis the approved plan is also the lowest. The proposed 1.80 lands near the middle of the comparable range, just below the comparable median of 1.86.

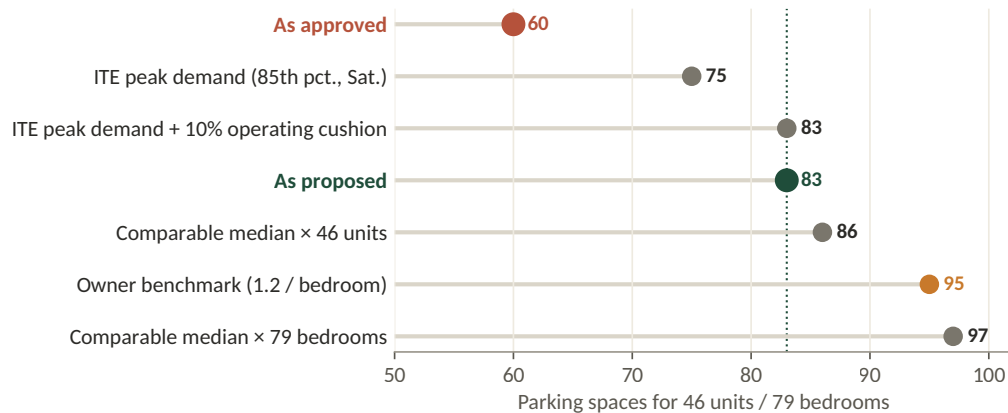


Figure 4. How 83 spaces compares to each benchmark. The approved 60 falls below every measure of need. The proposed 83 sits at the conservative low end of the range: equal to ITE demand with a standard cushion, and below both the comparable medians and the applicant's own benchmark.

A measured request

The applicant is not asking for as much parking as it could justify. Its own operating benchmark of 1.2 spaces per bedroom would support 95 spaces, and the comparable medians would support 86 to 97. The request is limited to what the evidence shows is needed to keep residents' vehicles on site: a single compact bay behind the building, fully landscaped, with its stormwater managed on site, and paired with an expanded commitment to electric-vehicle charging.

SECTION 5 • THE PROPOSED SOLUTION

23 spaces, thoughtfully designed

The additional spaces are located in a single bay on the west side of the site, adjacent to the approved parking area and away from the Marshall Street and Grant Road frontages, keeping parking behind the building rather than along the street.

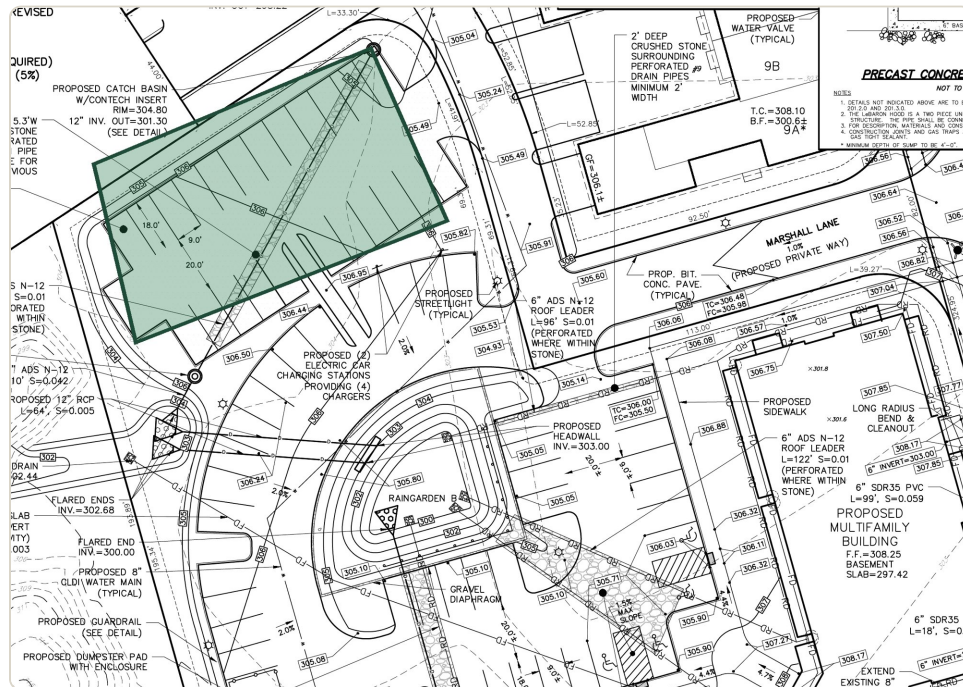


Figure 5. Proposed additional parking area (highlighted). Excerpt from #77 Grant Parking Plan, Stamski and McNary, Inc., rev. September 17, 2026. Highlight added for clarity; refer to the permit set for all dimensions and details.

Layout & access

83 total spaces, 9'×18' stalls, 20' aisle
 • **4 accessible spaces** (4 required) • **4 EV chargers** plus **4+ EV-ready spaces**
 • no parking on street frontages

Stormwater

6,696 SF new impervious fully managed • **562 CF** storage in 106' stone trench with perforated pipe • Contech CS-4 separator catch basin

Landscape

8 native trees (6 black tupelo, 2 flowering dogwood, 3" cal.) • **37 native shrubs** • approved maples relocated • root-zone protection

Going beyond the EV requirement. The approved plan included four EV chargers, and at 83 spaces those four still meet the Devens guideline of charging at 5% of parking spaces. Because the added parking will serve more vehicles, and to support the community's sustainability goals, the applicant will also install infrastructure for **at least four additional charging stations**: conduit and electrical capacity in place, ready for charging heads to be added as demand grows. That brings Emerson Green to **eight or more EV-capable spaces**, about 10% of the lot, making it an attractive home for EV drivers today and ready for more of them tomorrow.

SECTION 6 • LOOKING AHEAD

Planning for residents and neighbors

Providing the right amount of parking from the start is one of the simplest ways to help a new community settle in well. Drawing on its experience operating similar communities, the applicant believes the additional 23 spaces will support Emerson Green in several ways:

- 1 Keeping neighborhood streets calm.** With enough room on site for residents and their guests, Marshall Lane, Marshall Street, and Grant Road can stay as they were designed, preserving the walkable character of the Emerson Green neighborhood.
- 2 Supporting safe access and winter operations.** Keeping drive aisles and private ways clear helps emergency vehicles move easily, and a few open spaces give residents somewhere to shift cars so plowing crews can do their work.
- 3 Protecting the landscape.** When every car has a place to park, lawns, planting islands, and the rain garden can do their job, and the site's plantings and stormwater features stay healthy over time.
- 4 Serving every household fairly.** Two-bedroom homes, often shared by two working adults, and residents who rely on accessible routes to the building will all be able to park close to home.

Planning this now, as a thoughtfully landscaped addition, lets the site open ready for the people who will live there, and gives the neighborhood confidence that the building will fit in comfortably.

Conclusion

Emerson Green Residences was permitted with the lowest parking ratio in every comparison the applicant could make: against its own operating portfolio, against the nine comparable communities studied, and against ITE national demand data. Adding 23 spaces brings the supply to 83, which matches national peak demand with a standard operating cushion while remaining below the comparable medians and below the applicant's own benchmark. The expansion also doubles the site's EV capacity, pairing four installed chargers with infrastructure for at least four more.

The applicant respectfully requests that the Commission approve the modification to the Unified Permit to allow the 23 additional parking spaces shown on the accompanying plans.

APPENDIX

Data, methods & sources

Key calculations

MEASURE	RATE	BASIS	SPACES / VEHICLES
As approved	0.76 / bed • 1.30 / unit	—	60
ITE peak demand, weekday per bedroom	0.86	79 beds	68
ITE peak demand, Saturday per bedroom	0.88	79 beds	70
ITE peak demand, weekday per unit	1.52	46 units	70
ITE peak demand, Saturday per unit	1.62	46 units	75
ITE Saturday demand ÷ 90% practical capacity	—	75 ÷ 0.90	83
As proposed	1.05 / bed • 1.80 / unit	—	83
Comparable median per unit	1.86	46 units	86
Applicant operating benchmark	1.20 / bed	79 beds	95
Comparable median per bedroom	1.23	79 beds	97

Occupancy in Figure 2 = ITE projected vehicles ÷ spaces provided. ITE figures are 85th-percentile peak demand for multifamily housing in general urban/suburban settings not within ½ mile of rail transit.

Sources

Applicant's multifamily parking matrix: unit, bedroom, and parking counts and operating observations for nine Massachusetts communities (Millbury, Boylston, Shrewsbury, Marlborough, Acton, Grafton).

Institute of Transportation Engineers, *Parking Generation Manual*, 5th Edition (2019), multifamily rates as tabulated in the Town of Concord, MA, Zoning Bylaw Parking Table Sheet – Residential Uses.

Effective supply and practical capacity (85–95% occupancy): common practice in municipal parking studies, e.g., Walker Consultants study for the City of Cleveland Heights, OH.

Devens Community, Transportation (MART shuttle to Fitchburg Line); Montachusett Regional Transit Authority, Devens On-Demand and MART Connects service descriptions.

Stamski and McNary, Inc., #77 Grant Parking Plan (SM-6944A/5666), July 7, 2026, rev. August 24 and September 17, 2026; McCarty Engineering, Inc., Landscape Plan L-1, September 17, 2026.