



TOWN OF NEEDHAM, MA

PLANNING AND COMMUNITY
DEVELOPMENT DEPARTMENT

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Needham, MA 02492
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ECONOMIC DEVELOPMENT

April 14, 2017

Board of Selectmen
Town of Needham
1471 Highland Avenue
Needham, MA 02492

Re: Citizens' Petition Food Truck Article

Dear Members of the Board of Selectmen,

The Council of Economic Advisors ("CEA") has asked that I submit a letter to the Board of Selectmen indicating the members' majority opposition to the Citizens' Petition which seeks to replace the current Mobile Food Truck Policy (created by the Board of Selectmen as a regulation) with a General By-law Amendment to allow, inter alia, a food truck in Needham Center (adjacent to the Greene's Field).

Food trucks are presently allowed only in designated areas of Needham Crossing which have been deemed "underserved". In addition to doing away with that requirement altogether, the proposal also reduces the fee from \$1000 for a season to \$250. Under the proposal a food truck would be allowed in the Center in the public right of way (presumably taking up to two public parking spaces during the highest peak demand in parking). The Petition also reduces the required distance from a mortar and brick restaurant from 200' to 50'. The Petition also changes a flexible policy into a By-Law provision, specifying locations which can the only be changed by Town Meeting amendment.

At the center of the CEA's concern is the unfair nature of the competition such a plan poses to our brick and mortar restaurants. Established restaurants invest heavily in their facilities—both in terms of the time and expense of permitting these specially permitted uses and in retrofitting the spaces themselves—and they pay considerable rents for their use of downtown storefronts. Through their leases most restaurants pay the property taxes attributable to their spaces. It appears to be fundamentally unfair for a food truck to be able to park nearby at minimal expense and compete for customer business. Restaurants in our downtown already face considerable challenges in maintaining ongoing businesses; they cannot afford competition from businesses which have minimal investment in our community and pay a nominal fee to open their doors. The CEA believes this proposal may be detrimental to our downtown area. The CEA considers many restaurants in the Center to be destination businesses, which in turn provide foot traffic beneficial to the other businesses in the area. Providing food truck alternatives that threaten the trade and therefore welfare of the brick and mortar restaurants will be detrimental to the economic health our downtown areas. Members fear that this sort of competition may drive already struggling food establishments out of business and result in empty storefronts.

The CEA does not perceive any proper benefit to the Town by allowing food trucks in areas already served by a variety of food alternatives. It is only of obvious benefit to the food truck owners themselves, who, with little or no overhead, can park literally on top of brick and mortar restaurants. It should also be noted that they will be taking away critical public on-the-street parking during times when downtown parking in general and on-the-street parking in particular is in short supply (12:00-2:00 p.m.) Given all the effort to which the Town went to make sure that the streetscape design did not reduce on-the-street parking in any material way, it would be egregious to give up centralized on-the-street parking to food trucks paying \$250 for months of operation. As businesses noted during the discussion of the streetscape, customers look for on-the-street parking and, if they don't see it, they simply may not stop.

Removing the requirement that areas be "underserved" in order to allow food trucks is misguided. The lack of brick and mortar restaurants in Needham Crossing is the CEA hopes, a temporary situation which will change with development. Although food trucks can fill the need for food services now, allowing them when an area is no longer "underserved" may well undercut the development of brick and mortar restaurants. The CEA wishes to incent permanent restaurant establishments; allowing food trucks when an area is not "underserved" undercuts that goal.

For these reasons, the members of the CEA strongly urge the rejection of the Citizens' Petition.

Sincerely,



Devra G. Bailin
Staff to Council of Economic Advisors

cc: Kate Fitzpatrick