



**Lehigh Valley Planning Commission**

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May 1, 2015

Ms. Louise M. Kelchner, City Clerk  
City of Bethlehem, City Hall  
10 East Church Street  
Bethlehem, Pennsylvania 18018



**RE: Zoning Ordinance Amendments – Tree Conservation  
SALDO Amendments – Recreation Fees  
City of Bethlehem  
Northampton County**

Dear Ms. Kelchner:

The Lehigh Valley Planning Commission (LVPC) considered the subject amendments at its April 30, 2015 meeting pursuant to the requirements of the Pennsylvania Municipalities Planning Code (MPC).

The zoning ordinance amendment on tree conservation does not conflict with the County Comprehensive Plan. The amendment allows for a one-to-one tree replacement at a new development, instead of the previous proposal of two new trees for each removed, while only development in the RR (Rural Residential) and CM (Office Research Center) Districts must still replace trees at a two-to-one ratio. LVPC warns that this provision increases the likelihood of a net loss of trees on site at any new development, since the regulation does not and has never required replacement of unhealthy trees or those below a certain size. Furthermore, construction and earth disturbance can damage otherwise healthy trees. LVPC encourages the City to review our model regulations on *Woodlands* for details on tree protection methods that help to conserve natural resources, when development activity might otherwise pose a threat.

The SALDO amendment on recreation fees is a matter of local concern.

If you have any additional questions regarding the content of this letter, please do not hesitate to call. Kindly send a copy of the final amended zoning ordinance and SALDO that are adopted by the City, per requirements of the MPC. Thank you very much.

Sincerely,

Eric McAfee, AICP, LEED AP  
Director of Community Planning

cc: Darlene Heller, AICP, Director of Planning and Zoning  
John Spirk, Jr., Esq., City Council Solicitor  
Members of Council