



Brodhead Watershed Association

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3/27/23

To: Pocono Township Board of Commissioners & Planning Commissioners

112 Township Dr, Tannersville, PA, 18372

RE: **Stadden Group, LLC Waivers from Township Ordinance(s)**

The Brodhead Watershed Association has reviewed the Township Engineer's review(s), waiver request(s), and engineering plan(s) for Stadden Group, LLC's proposed project, in Pocono Township.

BWA's comments pertain specifically to Stadden Group, LLC's requested (or required) Waivers to the Township's ordinance(s).

Overall, BWA is of the opinion that hardship(s) here are being self-created by the applicant, Stadden Group, LLC. With better planning and due diligence, the property could be used for the permitted use without requiring the resource protection waivers.

The applicant may claim that not being granted a waiver(s) would affect the feasibility of the project. But economical valuation projections are purely speculative. Economic valuation should also be irrelevant to the standards to be applied by the Commissioners.

BWA recommends the Township strictly enforce the standards set forth by the Municipal Planning Code (MPC) and the Township's Subdivision and Land Development (SALDO) and deny the waivers. More specifically, **PA Municipal Planning Code, Section 503 (8); Pocono Township SALDO: Section 390-78 (A); and SALDO 390-78 (B) (3)** (i.e., "Justification for the modification including the full grounds and facts of unreasonableness or hardship").

Thank you for the consideration of these comments.

Respectfully submitted on the behalf of the Board of Directors,

Alexander Jackson, PhD

Executive Director, Brodhead Watershed Association