

LOUIS J. COLAGRECO, JR.  
Lou@RRHC.com  
Extension 203



**RILEY RIPER HOLLIN & COLAGRECO**  
ATTORNEYS AT LAW

March 17, 2023

via Hand-Delivery and Email

Mila Carter  
Director of Planning and Zoning/Assistant Township Manager  
Westtown Township  
1039 Wilmington Pike  
West Chester, PA 19382  
lcarter@westtown.org

Re: Westtown School – 975 Westtown Road  
Conditional Use Application – Athletic Field Lighting

Dear Mila:

As you know, this firm represents Westtown School (“Applicant”), the owner of approximately 579.61 acres of land located at 975 Westtown Road in Westtown Township, within the A/C Agricultural Cluster Residential District, which is further identified as UPI Nos. 67-2-19, 67-2-24, 67-2-24.2, 67-2-25, 67-2-25.1, 67-2-25.2, 67-2-25.3 and 67-5-27 (“Property”).<sup>1</sup>

Applicant is proposing improvements to the existing athletic fields on the Property which includes the introduction of exterior lighting. The introduction of permanent exterior lighting for athletic events is permitted by conditional use pursuant to § 170-1514.D.(5). Accordingly, Applicant herein files a Conditional Use Application for the proposed exterior lighting for athletic events.

Enclosed in connection with the Conditional Use Application are the following materials:

1. Sixteen (16) copies of the Westtown Township Conditional Use Application signed by Applicant/Owner;
2. Sixteen (16) copies of a Site Plan, prepared by ELA Group, Inc., dated March 14, 2023 (3 sheets);
3. Sixteen (16) copies of an Athletic Field Lighting Plan (including an Environmental Glare Impact plan), prepared by Musco Lighting, dated September 22, 2022;
4. Sixteen (16) copies of a Parking Area Lighting Plan, dated December 19, 2022;
5. Sixteen (16) copies of a Conditional Use Narrative, prepared by ELA Group, Inc., dated March 14, 2023;

---

<sup>1</sup> Approximately 113.55 acres of the Property is leased for farming.

Mila Carter  
Westtown Township  
Page 2 of 2

6. Sixteen (16) copies of a Stormwater Management Narrative, prepared by ELA Group, Inc., dated March 14, 2023;
7. Sixteen (16) copies of a Westtown School Oak Lane Turf Fields Transportation Operational Analysis, prepared by Traffic Planning and Design, Inc., dated March 14, 2023;
8. Sixteen (16) copies of a Noise Survey, prepared by Everbach Acoustics Consulting, dated January 26, 2023;
9. A check in the amount of \$2,500.00 made payable to Westtown Township for the Application filing fee; and
10. A check in the amount of \$10,000.00 made payable to Westtown Township for the Application escrow fee.

Electronic copies of the Application materials will be delivered via email.

Please forward the Application and enclosed documents for review by the Township consultants, Planning Commission and Board of Supervisors. Kindly advise as to when this matter will be reviewed by the Township Planning Commission and when a hearing will be scheduled before the Board of Supervisors on the Application. It is my understanding that the Township handles all applicable notice requirements. If that is not the case, please let us know and we will make appropriate arrangements.

As always, please feel free to contact us with questions. Thank you for your attention to this matter.

Very truly yours,

*/s/ Louis J. Colagreco, Jr.*

LOUIS J. COLAGRECO, JR.

LJC, Jr./GMG

Enclosures

cc: Kate Donnelly (via email, w/encl.)  
Jason Best (via email, w/encl.)  
Charles Haley, Jr. (via email, w/encl.)  
Alex Meitzler (via email, w/encl.)  
Mike Rufo (via email, w/ encl.)  
John Fitzgerald (via email, w/encl.)  
Carolyn Hapeman (via email, w/encl.)  
Gina M. Gerber, Esq. (via email, w/ encl.)