



April 25, 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](mailto:lcarter@westtown.org)

Re: Westtown School – 975 Westtown Road  
Revised Conditional Use Application Materials – 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 submitted a conditional use application (“Application”) on March 17, 2023 for the introduction of permanent exterior lighting for athletic events pursuant to § 170-1514.D.(5) and supplemented that Application on March 30, 2023 with revised plans and materials reflecting the illumination of one athletic field. Applicant and its project consultants herein provide responses to the various review letters issued by the Township’s Consultants and Staff, along with updated plans and materials addressing those comments.

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

1. Site Plan, prepared by ELA Group, Inc., dated March 28, 2023, last revised April 24, 2023 (3 sheets) and 1 copy with highlighted changes;
2. Athletic Field and Parking Lot Lighting Plan (including an Environmental Glare Impact plan), prepared by Musco Lighting, dated April 21, 2023;
3. Response Letter prepared by Traffic Planning and Design, Inc., dated April 20, 2023, to Township Traffic Engineer Albert Federico Consulting, LLC Review Letter of April 13, 2023;
4. C.V. of Robert G. Zoeller, MS of Musco Lighting, LLC;
5. Data Sheet for the proposed light fixtures for the athletic field; and
6. NPDES Permit No. PAC 150337.

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

Eight (8) paper copies of the materials and plans will be delivered to the Township tomorrow.

Applicant and its consultants herein provide the following responses to the review letters received from the Township’s consultants.

**Responses to Cedarville Engineering Review Letter of April 14, 2023 (REISSUE):**

1. *Section 170-1514.D.(1)(e) - Examples of illumination levels for typical outdoor applications, as extracted from the IESNA RP-33-99 and RP-8-00 Recommended Practices, are presented below.*

<i>Classification</i>	<i>Maintained Average Illumination</i>	<i>Uniformity Ratio</i>
<i>Parking (commercial/institutional, industrial/municipal use) – low activity (schools)</i>	<i>2/0.2 average minimum</i>	<i>5:1</i>
<i>Sidewalks and bikeways</i>	<i>5/.05 average minimum</i>	<i>4:1</i>

*The following shall be addressed:*

- *Clarification shall be provided regarding if any fixtures are proposed within the parking area. At present, the Illumination Summary on the Athletic Field Lighting Plan dated March 28, 2023 and the Westtown School – Parking Lot dated December 19, 2022 both show a deficiency along the parking area below the maintained average of 2. Due to the discrepancy in parking lot layout, it is unclear if both sets of light fixtures are proposed.*

The consolidated and updated Parking Lot and Athletic Field Lighting Plan shows a Maintained Average Illumination in the parking area of 2.1. The parking area is compliant with the Maintained Average Illumination and average minimums. The lighting plan is being further updated to comply with the Uniformity Ratio requirements for the parking area and will be submitted to the Township in advance of the conditional use hearing.

- *The lighting along the proposed walkway from the proposed support building to the spectator area on the Athletic Field Lighting Plan (sheet 3 of 11) shall be revised to provide an average footcandle value of 5 and a uniformity ratio of 4:1.*

The consolidated and updated Parking Lot and Athletic Field Lighting Plan shows a Maintained Average Illumination on the sidewalk of 6.0. The sidewalk is compliant with the Maintained Average Illumination and average minimums. The lighting plan is being further updated to comply with the Uniformity Ratio requirements for the sidewalk and will be submitted to the Township in advance of the conditional use hearing.

*The Parking Lot Plan shall be incorporated into the Athletic Field Lighting Plan and a sheet provided showing the illumination levels (footcandles) with all fixtures on, and present.*

A consolidated Parking Lot and Athletic Field Lighting Plan with all fixtures and illumination levels is submitted for the Township's review. The enclosed Plan will be further revised for compliance with the Uniformity Ratio of Section 170-1514.D.(1)(e).

2. *Section 170-1514.D.(2)(b) – For lighting horizontal tasks such as roadways, sidewalks, entrance drives and parking areas, luminaires shall meet IESNA full-cutoff criteria (no light output omitted above 90° at any lateral angle around the fixture).*

*Section 170-1514.F.(c) – Description of the proposed equipment, including fixture catalog cuts, photometrics, glare reduction devices, lamps, on/off control devices, mounting heights, pole foundation details and mounting methods.*

*The Project Summary on the Athletic Field Lighting Plan (sheet 1 of 11) dated March 28, 2023 shall be revised to include the proposed fixture BUG rating (not to exceed B2-U0-G1), and all applicable product data including, but not limited to, color temperature and distribution type.*

The proposed Musco TLC LET Luminaries are classified as IESNA Full Cutoff luminaries with no light output emitted above 90 degrees. The cut sheet of the luminaire has been included with this response.

Glare reduction is achieved via the large shield which blocks the view of the LEG light source from adjacent properties. As previously mentioned, the light source is LED and the on/off control is accomplished through a wireless control system. The designated authorized school personnel can utilize a computer, a smartphone app or dial a toll-free number to Manned 24/7 Control Center to turn the lights on and off. The wireless control system operates over CDMA digital cellular communication and eliminates the need for manual control of the lights, thereby ensuring that the lights are only on when they are scheduled to be on and turned off when they are scheduled to be extinguished. The mounting heights have been modified to be 70' with respect to the field playing surface and are no longer taller due to the elevation change at the pole location. The luminaires are mounting onto welded steel crossarms and are guaranteed to withstand winds of up to 150 mph without misalignment. A foundation design stamped and sealed by a Pennsylvania licensed structural engineer will be provided, meeting all of the local building code requirements.

In the review letter, item 2 in the third paragraph, page 3, you requested that the Musco Lighting Design which was presented March 28, 2023 be revised to include the proposed fixture BUG rating. The IES RP 6-20 and 6-22 Recommended Practice for Lighting Sports and Recreational Areas have no requirements or application of using BUG ratings

for sports lighting luminaires. The only reference to BUG ratings in the publication is the following:

Local jurisdictions may implement codes to attempt to limit glare and/or light trespass. (Note: BUG ratings do not measure glare). The use of luminaires that incorporate internal and/or external shielding (visors) to limit direct view of light sources and polished reflectors help reduce glare. Some types of optical components can also reduce glare and help direct the light where it is needed. Care should be taken to properly orient and aim lights to further mitigate glare impacts.

### **3.3 Energy Conservation**

Energy consumption is a major consideration for sports lighting. Depending on prevailing local rates and the tendency for rates to trend upward over time, energy costs may equal or even exceed sports lighting system capital costs over the life of a sports

This excerpt is taken from “Section 3.2.2.3 Glare”, the last paragraph.

It is my understanding that BUG ratings are typically used when dealing with fixed luminaires. Sports Lighting luminaires do not have fixed orientation and the aiming changes for each location on the pole. The ratings would always vary depending upon the aiming of the luminaires and hence are not typically required in the evaluation of sports lighting luminaires by the IES RP.

The color temperature, as indicated on the luminaire cut sheet, is 5700K. Each luminaire is individually designed and constructed so the distribution patterns vary from luminaire to luminaire.

- 3. Section 170-1514.D.(3)(c) – Floodlights and spotlights shall be so installed or aimed that they do not project their output into the windows of neighboring residences, adjacent properties, skyward or onto a public roadway. The use of searchlights or laser source lights for advertising or entertainment purposes is prohibited without a special permit.*

*Section 170-1514.D.(5).(e).[4] - The lighting shall be accomplished only through the use of full cutoff or fully shielded fixtures that employ suitable shielding. Such lighting shall be designed, installed, aimed, and maintained so that neither lamps (bulbs) nor primary reflecting surfaces shall be visible from any window of residential properties within a radius of 1,800 feet of the boundary of lighted field. The fixtures shall not present a hazard to drivers or pedestrians by projecting glare that impairs their ability to safely traverse streets, driveways, sidewalks, pathways and trails. The fixtures shall be mounted at an appropriate height, angle, and location to comply with the above conditions.*

*Due to the proposed improvement layout, fill, and light mounting heights, additional information shall be provided demonstrating that the proposed lighting does not produce any illumination or glare on/into adjacent properties and roadways within 1,800 feet of the field boundaries.*

The luminaries will meet the requirements of Section 170-1514.D.(3)(c).

The lighting distribution, as presented in the lighting design showing off-field light levels, does not consider any foliage or other objects that would further decrease light spillage levels. There is no illumination or glare produced onto adjacent properties. The proposed lighting will meet the requirements of Section 170-1514.D.(5)(3)[4].

4. *Section 170-1514.D.(3).(i) – Externally illuminated signs and billboards shall be lighted by fixtures mounted at the top of the sign and aimed downward. Such fixtures shall be automatically extinguished between the hours of 11:00 p.m. and dawn, except as specifically approved by appropriate officers or agents of the Township.*

*The applicant shall address the following:*

- *The location of a scoreboard or any other improvements requiring illumination associated with the field shall be clearly shown on the Plan.*

The plans have been revised to identify the location of all proposed scoreboards.

- *If a scoreboard or other feature is to be illuminated by an additional light fixture, the luminaire shall be clearly noted on the Plan and included in all calculations determining footcandles on each sheet. If no scoreboard is proposed, a note referencing this shall be provided on the Conditional Use and Land Development plans.*

While the proposed scoreboards are electronic (scores, time, period, etc. are displayed with LED lights), there is no supplementary lighting proposed for the scoreboards.

- *Fixture information shall be provided on the Plan and shall be in accordance with all fixture requirements (170-1514.D.(5).(e).[4]). This includes, but is not limited to BUG rating, distribution type, and luminaire color temperature.*

No additional light fixtures are proposed to illuminate the scoreboard.

5. *Section 170-1514.D.(3)(k) – For land development applications where lighting is required (i.e., zoning hearings, conditional use hearings), the credentials of the expert in outdoor lighting shall be described in writing. If the expert testimony is provided by more than one person, the credibility of each expert may be weighed by the Township.*

Applicant has retained Robert G. Zoeller, MS of Musco Lighting, LLC as its professional consultant with respect to the proposed exterior lighting. Mr. Zoeller's curriculum vitae is included with this response letter and provides his credentials, education and experience.

6. *Section 170-1514.D.(5).(c) – An annual permit application shall be required to be submitted to the Township 45 days before the start of each sports and recreation year that a permanent recreational and sports lighting installation is proposed to be utilized. A permit fee schedule shall be established by resolution of the Board of Supervisors each year to cover all costs to the Township to include, but not limited to, the following: [1]-[2]*

*Section 170-1514.D.(5).(e).[6] – For a recreational or athletic sporting event, such as football, soccer, field hockey, lacrosse or marching band cavalcade, utilization of the sports lighting system is subject to the following restrictions: [a]-[g]*

*The applicant is advised that the permanent lighted field will require an annual permit from the Township with a limited number of games per year and other restrictions as referenced by the noted Ordinance sections above. The Board of Supervisors shall establish a fee schedule as outlined by Section 170-1514.D.(5).(c) by resolution.*

Noted. Applicant will comply with this requirement.

7. *Section 170-1514.D.(5).(e).[2] – The maximum mounting height as measured from the finished grade of the playing field to the top of the highest fixture of recreational and sports lighting fixtures permitted by this subsection shall be as follows: [a]-[j]*

*Section 170-1514.D.(5).(e).[2][b] – Field Hockey: 70 feet.*

*Section 170-1514.D.(5).(e).[2][c] – Football: 70 feet.*

*Section 170-1514.D.(5).(e).[2][d] – Lacrosse: 70 feet.*

*Section 170-1514.D.(5).(e).[2][g] – Soccer: 70 feet.*

*The following shall be provided:*

- *The proposed uses of the athletic field where lighting is proposed shall be clearly noted on the plan.*

The plans have been updated to indicate the sports that will be played on the proposed lighted field (Field Hockey, Lacrosse, and Soccer).

The lighting design has been modified to meet the maximum mounting heights from all four poles and will be 70' above the playing surface to conform to the Ordinance.

8. *Section 170-1514.D.(5).(e).[14] –As a condition for installing permanent outdoor illumination for active recreational and sports facilities accessory to public, private, and parochial schools, universities and colleges, the Board of Supervisors shall require the*

*applying institution to take all reasonable steps, as recommended by a sound engineer hired by the Township, to mitigate noise resulting from nighttime events and its impact on the neighborhoods nearby the lighted facility. These mitigative actions must allow the applying institution to comply with § 116-1 and 116-2 of Chapter 116, § 170-1506 of this chapter and with any subsequent ordinances related to noise and good order.*

*The following shall be addressed:*

- *The plan shall clearly indicate the proposed sound system for the field, if applicable. If no system is proposed, a note shall be added to the Plan (and subsequent Land Development Plan) indicating this. If a sound system is to be proposed, the location of the system shall be shown, along with specifications demonstrating compliance with the above referenced Ordinance sections. The acoustics letter provided with this submission indicates that a Public Address (PA) system is to be provided.*

The plans have been revised to identify the field where the public address system is proposed. The specifications of this system will be provided and compliance with the applicable ordinances will be demonstrated as part of the land development application for this project.

- *The acoustics study letter prepared by Eberbach Acoustics Consulting Consultants shall be revised to address the following:*
  - *The referenced study indicates that noise measurements were based upon an assumption of a soccer practice of up to 56 players. The proposed parking lot proposes a total of 84 parking spaces required, resulting from the potential of a higher intensity use than assumed in the study. The study shall be updated, and shall be revised to be based upon full occupancy of the proposed parking space and existing spaces located to the east of the existing multipurpose fields, adjacent to the proposed fields.*

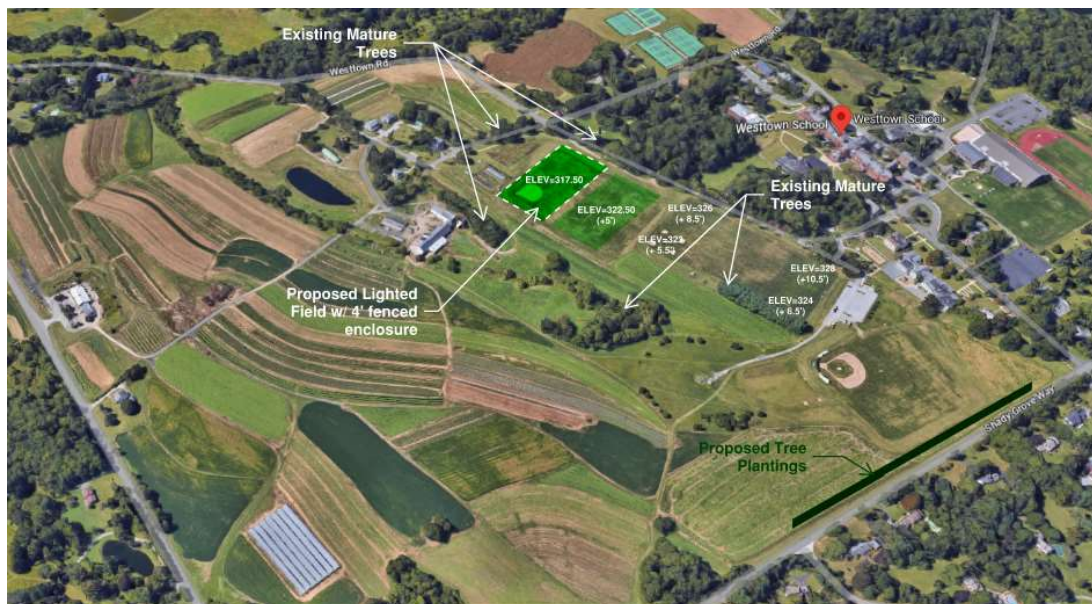
The number of players/participants referenced in the acoustics study is 56, which is a reasonable estimate of the number of people that will be utilizing the illuminated athletic field at any point in time. Even if the number of players/participants is doubled to 112, the noise produced would be an increase of only 3 decibels, as described in paragraph 4 of the January 26, 2023 letter from Everbach Acoustics Consulting. The number of proposed parking spaces is not necessarily representative of the number of people utilizing the illuminated athletic field at any given point in time, as the parking area is designed to accommodate the use of both athletic fields during daytime use. However, even if every car contained two players/participants and the total of 84 parking spaces produced 168 players/participants, the total increase in field noise would only be 4.77 decibels higher than the 56 players/participants quoted in the study, resulting in a reasonable noise level on the Property.

- *The study recommends calibrating the degree of amplification on the Public Address (PA) so that sound level at the most sensitive adjacent property is below the maximum noise limit of the Ordinance. The following conditions shall be considered:*
  - *A plan shall be provided showing estimated decibel levels at adjoining property lines based upon a level of amplification that will produce no noise at the closest adjoining property line.*

The specifications of the PA system will be provided and compliance with the applicable ordinances will be demonstrated as part of the land development application for this project. The PA system will be designed and calibrated so that the maximum decibel level at the closest adjoining property line equals the measured average background noise in the absence of PA system activation, as per Section 170-5016(A),(2). It should be noted that noise decays with distance due to spherical spreading at 6 decibels per doubling of distance. Accordingly, “no noise” at the closest adjoining property line from the PA system is virtually impossible.

- *The Conditional Use – Site Plans shall incorporate an enclosure and vegetation surrounding the field, to an elevation six (6) feet above the elevation of the proposed field, subject to approval of Westtown Township.*

The plans indicate an enclosure surrounding the lighted field (to be a 4’ high fence). On each side of the proposed lighted field there are nearby existing mature trees and/or terrain extending to 6’ above the elevation of the proposed field that will serve to absorb and dampen sounds generated through the use of the field. Where the existing features are deemed to be lacking or insufficient, the Applicant has proposed tree plantings. See below:





9. *Section 170-1514.F.(1).(a) –A site plan, complete with all structures, parking spaces, building entrances, traffic areas (both vehicular and pedestrian), vegetation that might interfere with lighting, and adjacent use that might be adversely impacted by the lighting. The plan shall contain a layout of all proposed fixtures by location and type.*

*The provided conditional use plan and site lighting plans shall be revised to show a consistent layout regarding parking and walkway placement. This includes, but is not limited to the following:*

- *Parking configuration*
- *Location of ADA spaces*
- *Walkway locations and connections between parking and facilities.*

The lighting plans will be updated such that the above enumerated features match those appearing on the conditional use site plans.

10. *Section 170-1617.A - as part of an application for a flexible development or for any application for development of three or more acres of nonresidential development or for five or more residential lots, the applicant shall submit the sketches described in this Section 170-1617 and shall demonstrate to the satisfaction of the Planning Commission that the following process was followed in designing the proposed development.*

*This application proposes greater than three (3) acres of non-residential development, and therefore will require the Conservation Design process be applied as referenced in Section 170-1617 and in this letter. The submitted Conditional Use application proposes development of a 3-acre parcel for non-residential development. The applicable plans and maps required for Conservation Design will be required at the time of Land Development Plan submission, however the applicant may elect to address at Conditional Use stage. This includes, but is not limited to, demonstrating that the plan as proposed is in compliance with the applicable provisions of Section 170-402, Steep Slope Conservation District.*

Acknowledged. The Applicant will demonstrate compliance with the applicable Ordinance provisions as part of the land development application for the project.

11. *Section 170-2009.B.(3).(d) - The application shall include sufficient information, e.g., preliminary site grading and road profiles, preliminary stormwater management analysis, etc., to preliminarily determine compliance with the Township natural feature, site analysis, conservation design process (if applicable) and density requirements.*

*Section 170-2009.B.(6).(b) – In addition to demonstrating compliance with all standards applicable to the conditional use being requested, the site plan shall show the applicant's intentions with regard to the following: Location, approximate dimension, and arrangement of all areas devoted to ground cover, trees, screen planting, pen space, recreation, and similar purposes, as applicable.*

*I. Section 170-1703.A.(1) - There shall be an adequate, safe, and convenient arrangement of pedestrian circulation facilities, roadways, driveways, off-street parking and loading space. Pedestrians moving between buildings shall not be unnecessarily exposed to vehicular traffic.*

*Section 170-1703.A.(3) - Landscaped, paved, and comfortably graded pedestrian walks, appropriate also for use by wheelchairs, shall be provided along the paths of the most intense use, particularly from building entrances to parking areas and adjacent buildings. Such walks shall have a minimum width of four feet.*

*Section 170-1703.A.(5) - Ramps shall be provided, giving access from parking areas to the building served, for disabled persons utilizing wheelchairs.*

*II. Section 170-1710.E.(2) - Commercial or other uses which do not exceed 6,000 square feet of gross leasable area, and which involve regular deliveries as part of their operation, shall be provided with a minimum of one off-street loading space.*

*III. Section 170-1509.D - Any organic refuse and garbage shall be stored in tight, vermin-proof containers. On multifamily, commercial, or industrial properties, solid waste storage shall be centralized to expedite collection. Storage containers shall be enclosed on three sides with masonry walls and shall be architecturally screened.*

*The following shall be addressed:*

- *The applicant shall confirm that the pedestrian path between the proposed handicap parking spaces and the proposed spectator area will comply with the applicable criteria set forth in the latest ADA Standards for Accessible Design.*

*Confirmed. The longitudinal slopes of the proposed pedestrian paths have been indicated on the site plans and the project will comply with all applicable ADA requirements.*

- *The applicant shall clarify and demonstrate to the satisfaction of the Township that regular deliveries are not applicable for the proposed use. If regular deliveries are applicable, one off-street loading area shall be provided, exclusive of parking spaces, in accordance with the applicable criteria set forth in Section 170-1710 of the Zoning Ordinance.*

*There will be no deliveries to the proposed building and/or athletic fields.*

- *The applicant shall address the method of refuse removal proposal. If on-site dumpsters are to be used, the Conditional Use Plans shall clearly show the location and screening associated with the dumpster during the Conditional Use process or Land Development.*

Dumpsters are not being proposed as part of this project. Refuse will be collected in marked containers and regularly removed and transported to existing dumpsters on campus by Westtown School personnel.

**Responses to Westtown Township Completeness Review dated April 14, 2023:**

1. *§170-2009.B(3)(d) requires the application to include sufficient information to preliminary determine compliance with the Township natural feature, site analysis, conservation design process (if applicable) and density requirements.*

*Although several details are included with the application submission, the applicant shall review the extent of outstanding items and address those as appropriate.*

The Applicant has provided preliminary site grading on the Conditional Use Site Plans and a preliminary stormwater management analysis in narrative form with key stormwater management features identified on those plans. Because there are no roads being proposed, road profiles are not applicable and have not been provided. And while the plans do depict numerous natural features, including individual trees, wetlands, streams, floodplains, and topographic features, we recognize that, at this time (for the purposes of the Conditional Use Application), we have not fully demonstrated compliance with the Conservation Design Process. The Applicant acknowledges the applicability of the Conservation Design process requirements to this project and intends to demonstrate compliance with them as part of the land development process.

2. *§170-2009.B(4) requires the scale of the Site Plan to be one inch to 50 feet.*

*Please let the Township know if this requirement cannot be met for plan sheets that do not depict entirety of the parcel subject to this application.*

Due to the size of the subject property and the extent of the proposed improvements, it is necessary to set the scale of the Conditional Use Site Plans at a scale other than 1" = 50'. Doing so enables the Applicant to appropriately demonstrate the relationship between the proposed features and adjacent properties located more than 1,000 lineal feet away on the same plan sheet.

3. *§170-2009.B(6) requires the site plan to show the applicant's intentions with regard to several requirements.*

*Although several requirements are included on the submitted Site Plan, the applicant shall review the outstanding items and address those as appropriate.*

The Applicant has provided the appropriate detail to demonstrate compliance related to site access, interior circulation, parking, intended vegetative cover (including trees), spaces devoted to recreation, and stormwater management. We have revised the plans to include

additional detail with respect to the proposed building, including overall dimensions, gross floor area, height, and planned use(s).

4. *§170-2009.B(7) requires the applicant to include site analysis and the conservation design process (§170-1617).*

*The compliance with the conservation design process will be required at the time of land development submission. The applicant may choose to address this requirement during the conditional use process.*

The Applicant acknowledges the applicability of the Conservation Design process requirements to this project and intends to demonstrate compliance with them as part of the land development process.

5. *§170-1514.D(5)(e)[5] requires the sports lighting system to only be energized in conjunction with any of the events listed in said section.*

*The applicant shall confirm that proposed permanent lighting be utilized only for events as specified in the requirements.*

Permanent lighting for the athletic field shall be utilized in accordance with the Ordinance.

6. *§170-1514.D(5)(e)[6] restricts the utilization of the sports lighting system for a recreational or athletic sporting event, including soccer, field hockey, lacrosse.*

*The applicant shall confirm that proposed lighting system will be in compliance with these restrictions.*

Permanent lighting for the athletic field shall be utilized in accordance with the Ordinance. The plans have been updated to indicate the sports that will be played on the proposed lighted field (Field Hockey, Lacrosse, and Soccer).

7. *170-1514.D(5)(e)[9] provides maximum luminance permitted for any light source including scoreboards.*

*The applicant shall provide lighting details for proposed scoreboards.*

While the proposed scoreboards are electronic (scores, time, period, etc. are displayed with LED lights), there is no supplementary lighting proposed for the scoreboards. The Applicant will provide a catalog cut of the desired (or substantially similar) scoreboard for the Township's review as part of their land development application.

### **Responses to Westtown-East Goshen Regional Chief of Police Review dated April 21, 2023:**

1. *LIGHTING AND SOUND COMPLAINTS: As acknowledged in the WCASD Agreement with Westtown re Rustin High School events (dated September of 2011), the lighting of a stadium*

*and the sound associated with evening events has the recognized potential to disturb the residents in the surrounding neighborhoods – resulting in complaints to the police. This potential should be recognized because the hours of operation for the proposal are identical to that specified in the WCASD agreement (activities ending at 10:00 p.m.). Although the Township should be aware of the potential for increased police services due to the complaints, this issue is best addressed with the potentially impacted neighbors.*

Noted. Applicant has shared its plans with the neighbors and have had dialogue with those neighbors that are interested in discussing the project with the Applicant. Applicant is proposing to comply with the requirements of the Township Ordinance as it relates to the proposed athletic field lighting.

- 2. CLARIFICATION OF USAGE: The current proposal under consideration indicates that only a single field would be illuminated and that the field was solely for the use of Westtown School and its students (and associated individuals, such as their families). However, Westtown School has traditionally hosted large tournaments in the past that have included a large number of outside participants. We request that the Township clarify whether the lighted field would be utilized in these tournaments, specifically for the purpose of permitting the tournament to continue after sunset. This increase in individuals utilizing the fields after dark, particularly by individuals who are unfamiliar with the roadways, could potentially create safety issues such as an increase in crashes. In the event that the school does anticipate usage in this manner, we would suggest that Westtown Township require the school to pay for police officers to assist with traffic control in the same manner specified in the WCASD Agreement re Rustin High School events (extra duty details).*

Applicant will utilize the illuminated athletic field only for Westtown School use in compliance with Section 170-1514.D.(5)(e)[5][a] of the Zoning Ordinance.

- 3. CRASHES: The Transportation Operational Analysis conducted by the traffic engineer examined the number of reportable crashes contained in PennDOT's database for the various roadways impacted by the proposal. As reported in their analysis, the crash data from PennDOT indicated that reportable crashes on the roadway were relatively rare. However, most police departments (including WEGO PD) investigate non-reportable crashes at a significantly higher rate than reportable crashes. For example, 60-70% of the overall crashes investigated by WEGO PD are non-reportable. If requested, the police department could provide additional data for the non-reportable crashes for the impacted roadways. This issue is relevant because any increase in crashes (reportable or non-reportable) would result in an increase in police services.*

Noted. As indicated in the comment, the Transportation Operational Analysis (TOA) does include reportable crash data. The project is located along Westtown Road, which is a state road over which PennDOT has jurisdiction. PennDOT requests review of only reportable crash data, which has been provided. The TOA, however, also analyzed crash data provided by the Westtown-East Goshen Police Department obtained for 2017 to 2021, which included

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3 crashes located at the Westtown Road/West School Lane intersection (TOA, p. 3). These crashes were attributed to driver error and not deficient sight distance or roadway characteristics.

**Responses to Township Traffic Engineer Review dated April 13, 2023:**

Provided under separate cover.

**Response to Westtown Fire Chief Review dated April 1, 2023:**

No comments to address. Thank you for the review.

Please forward the responses herein and the updated documents and plans for review by the Township consultants, Planning Commission and Board of Supervisors. We anticipate this matter will be reviewed by the Township Planning Commission on May 3, 2023, and a hearing will follow before the Board of Supervisors on May 9, 2023.

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

Very truly yours,



GINA M. GERBER

GMG/  
Enclosures

cc: Kate Donnelly (via email, w/encl.)  
Chris Benbow (via email, w/encl.)  
Mich Canuso-Bedesem (via email, w/encl.)  
Jason Best (via email, w/encl.)  
Alex Meitzler (via email, w/encl.)  
Mike Rufo (via email, w/ encl.)  
John Fitzgerald (via email, w/encl.)  
Bob Zoeller (via email, w/encl.)  
Carr Everbach (via email, w/encl.)  
Louis J. Colagrecó, Jr., Esq. (via email, w/ encl.)