

February 26, 2026

Jefferson Township Planning Commission
670 Cedar Grove Road
Burgettstown, PA 15021

Subject: Cornerstone Solar – CUP Application
Planning Commission Comment/Response

Dear Planning Commission,

Thank you for your comments on the Cornerstone Solar, LLC consolidated conditional use application (CUP). Provided below are Planning Commission comments and our responses in blue text. The applicable CUP documents that have been updated and will be uploaded to the Jefferson Township website.

1. A couple of minor corrections are recommended. Some maps are labeled Jefferston not Jefferson. Miller Road is labeled T335; it is T338 per Mr. Karch's old list of township road designations.
 - Updated Site Plan. In regard to Miller Road, based on PennDOT's Type 5 Township Map, Miller Road is labeled as T335, and Scott Hollow Road is labeled as T338. The PennDOT map can be provided upon request.
2. Section numbers and pages refer to the Jefferson Township Zoning Ordinance. Section 212.1 A 1 states: Permit applications for SEF shall document compliance with this Ordinance (p. 39)
 - Noted
3. The CUP does not identify by each parcel whether the developer is purchasing or leasing the parcel. Require that the developer list by parcel whether purchased or leased. This information is critical to applying our zoning ordinance.
 - Appendix A, Figure 4, has been updated to show which parcels would be purchased/leased/easement.
 - Section 6 of the Narrative has also been updated.
4. The various maps do not indicate the surrounding parcels and owners on the WV side of the northern section. This is required to enable proper notification and posting. The Planning Commission has not seen copies of the actual notice letters sent by the developer, demonstrating that the notice was sent timely to all who are owed notice. There is no evidence of notice to any WV residents/property owners bordering the proposed facility. There are different notice requirements also (substation pg. 30). Various members have heard that PA residents got notice letters, but there is no documentation provided. A sample letter is enclosed as

exhibit N but nothing else in the section.

- Appendix A, Figures 4 and 5, have been updated to show WV parcels.
 - Provided in Attachment N are copies of the application notice letters, public hearing notice letters, and certified mail receipts.
5. A member of the public asked that notification of residents along the roads that will be used of commencement of construction activities be given. The concern is about a sudden increase in heavy truck traffic.
- Section 3 of the Construction Transportation Plan has been updated to include notice and signage for start of construction. Any signage will need to be approved by the appropriate jurisdiction (State, County, Township) prior to posting signage.
6. A section in the northern section of the development that appears to be comprised of parts of several parcels (possibly four) is labeled "excluded from purchase." This appears to indicate that the rest of the parcels will be purchased, and so a subdivision plan that conforms to the Agricultural District zoning requirements is needed. The non-purchase area is surrounded by parcels that will be developed, which might make it landlocked, which is not permitted. There appears to be evidence of a ROW space which terminates in WV in an area of game lands. A ROW must terminate at a public road or private road with deeded access and use and maintenance. The area that will not be purchased is estimated to be an area of toxic chemical dumping that is on the Superfund Site list of the federal government (EPA). It is essential that proper access for vehicular traffic is provided for as clean-up is desired by the Township. Recommend that, prior to conditional use permit approval, the property owner evidence a satisfactory subdivision plan, including sewage planning module, all setbacks, and required 200 foot road frontage requirements are met. Recommend that prior to subdivision/land development approval, evidence that the Superfund site cleanup has been completed
- Clarification Regarding Government Environmental Investigation
 - The referenced area is not listed on the EPA's National Priorities List (NPL) and is not designated as a "Superfund Site".
 - The EPA is investigating portions of the Project site and that investigation is still pending.
 - Use of the term "Superfund" may lead to confusion as to the area's regulatory status.
 - Status of Subdivision Plan
 - At this time, no subdivision plan has been finalized. The Site Plan identifies an area labeled "excluded from

- purchase,” but the exact size, configuration, and location of any excluded property have not yet been finalized.
- These boundaries will be influenced by several factors, including:
 - Findings and recommendations resulting from the EPA’s investigation
 - Final project engineering and layout
 - Access considerations
 - Township and County subdivision requirements
 - The Applicant acknowledges that if parcels are to be subdivided, a formal subdivision plan conforming to all applicable Township and County requirements will be required.
 - To address the Township’s concerns, the Applicant is willing to accept the following as conditions of the Conditional Use Permit:
 - Subdivision Condition – An approved subdivision plan shall be recorded prior to commencement of construction.
 - Regulatory Approval Condition – All required Federal and State approvals applicable to the project, including any required environmental clearances or agency determinations, shall be obtained prior to commencement of construction.
 - These conditions ensure that subdivision compliance and regulatory oversight are resolved prior to construction activity.
7. 210.12 pg. 28 Requires a minimum ROW on each side of a transmission line to be 110%. The ROW is 125 feet. This is adequate for the 56.5 foot poles. One pole is 70 feet, which requires a 154 foot ROW around this pole. ROW must be increased prior to permit. See chart 2 or 4 labeled 34.5 KV Cornerstone Plan and Profile.
- The Site Plan has been updated with the appropriate ROW. Section 25 of the Narrative has also been updated.
8. 212.1A 1 c requires transmission lines to be shown. The connection from the facility to the grid is not shown. The grid power line is not shown. This may be in WV, and is an integral part of this CUP. Requires correction. There is no way to provide proper notice and posting to WV residents without such location or to determine if the ROW requirements are met.
- The connection to the 345kV transmission line has been added to the Site Plan. Section 25 of the Narrative has also been updated to describe the location of the 345kV connection.
9. 212.1A 1 m and CUP Appendix I -A Landscaping Plan showing compliance with the screening and buffering provisions of the Ordinance. The landscaping plan provided appears incomplete. It

shows additional plantings only in the southern areas, and those appear to be on background that is similar to what is portrayed around the northern sites. There does not appear to be a narrative that specifically states that the buffering in the areas without new plantings indicated meets the requirements, nor any proof of this from a study. The Landscape Details charts seem to indicate that the contractor will only be required to maintain new plantings. Silence is not sufficient and should be corrected prior to issuance of a permit.

- The Landscaping Plan has been revised and supplemented to clarify compliance with the screening and buffering provisions of the Ordinance. The Ordinance provides that: *“A combination of natural topography and vegetation can serve as a buffer, provided that the SEF will not be visible from public roads, public parks or existing residences on surrounding properties.”* (p. 54). The areas where no additional plantings are shown meet the Ordinance’s screening and buffering requirements through the presence of existing mature forest and natural topography. As demonstrated in Appendix H – Viewshed Analysis, the existing forested buffer effectively reduces visibility of the Project from public roads, public parks, and existing residences. Therefore, additional plantings are not required in those areas to achieve compliance.
- To further clarify maintenance obligations:
 - The Applicant will monitor and manage a 100-ft wide existing forested buffer in addition to any newly installed plantings.
 - Additional narrative has been added to the Vegetation Management Plan describing monitoring and management of the existing forested buffer.
 - Notes on Sheet L-006 of the Landscaping Plan has been updated to clarify that contractor requirements apply to both existing vegetative buffers and new plantings.
 - Revised Note Text: The Contractor shall monitor the designated existing vegetative forested buffer, as identified in the Landscaping Plan, and evaluate vegetation health and survival, including evidence of disease, invasive species, storm damage, die-off, gaps in screening effectiveness, and overall buffer integrity. Monitoring of the designated buffer area shall occur at minimum twice annually, once in the spring and once in the fall. If widespread die-off or loss of vegetation occurs within the buffer such that the effectiveness of visual screening is materially

reduced, as determined by observable gaps, the affected areas shall be replanted during the next appropriate planting season. Replacement plantings shall meet applicable planting standards as detailed in the Landscaping Plan for the 25-ft wide vegetative buffer plantings.

10. 212.1A 1 n and CUP Appendix J -Vegetation Management Plan Establishment and maintenance of the buffer zone is a critical element of the conditions under which an SEF may be developed. The section purporting to be a vegetation management plan is actually a grouping of aspirational statements rather than a specific plan. While there is much good information and advice about vegetation management, it does not appear to be a specific plan with specific responsibilities assigned to identified personnel, monitoring and oversight from the Township, and that it MUST cover the entire buffer zone, not just areas newly installed by a contractor. There are frequent uses of words like should, could, may etc. that do not elevate this to an actual plan. Specific people are not identified as responsible for the work, monitoring, deficiency reporting and corrective action should parts of the buffer zone be damaged, died out, etc. It is imperative that the entire buffer zone is adequate and maintained for the life of the project. A specific plan with specific responsible parties and actions, with contact info, must be provided for review prior to granting a conditional use permit. In addition to establishing the buffer zones, it must specify frequency of inspection for damage, replacement of damaged vegetation and maintenance of the buffer.

- **Responsible Parties and Contact Information**
 - Prior to commencement of construction, the Applicant will provide the Township with the name, title, company, and contact information for the entity responsible for vegetation management and buffer maintenance.
 - Once the long-term maintenance contractor is selected, the Township will be provided with direct contact information for the contractor responsible for inspections, deficiency reporting, and corrective action implementation. Any change in responsible party during the life of the project will be promptly communicated to the Township.
 - The Applicant will retain ultimate responsibility for compliance with the approved Vegetation Management Plan.
- **Applicability to Entire Buffer Zone**
 - The Vegetation Management Plan will address management

practices for the entire buffer zone under the control of the Applicant, including:

- Newly installed plantings within the 25-ft vegetative buffer on the southern portion of the Project
- Any supplemental plantings installed as replacements
- 100-ft wide existing forested buffer on the northern and southern portions of the Project
- The plan will not be limited to newly established areas but will ensure long-term viability and effectiveness of the 100-ft wide existing forested buffer.
- Preservation of Existing Forested Buffer
 - No commercial timber harvesting will take place within the existing forested areas under the control of the Applicant.
 - If there is widespread die-off within the 100-ft wide existing forested buffer that materially affects the effectiveness of the vegetative screening, the Applicant will work with the Township to identify planting locations, and the planting plan will follow the planting palette proposed for the 25-ft vegetative buffer.
- Inspection Frequency and Monitoring
 - The 100-ft wide existing forested buffer zone will be inspected on a semi-annual basis (twice per year) for the life of the project.
 - Inspections will evaluate the following: vegetation health and survival, evidence of disease, invasive species, storm damage, or die-off, gaps in screening effectiveness, overall buffer integrity
 - Inspection findings will be documented internally, and deficiencies will trigger corrective action.
- Replacement and Corrective Action
 - Where substantial die-off within the 100-ft wide existing forested buffer impacts the effectiveness of the vegetative screening, the following corrective actions shall occur:
 - The Applicant will work with the Township to determine locations of replacement plantings
 - New plantings will follow the planting palette proposed for the 25-ft vegetative buffer.
 - New plantings will occur within six (6) months of identification, weather and seasonal planting conditions permitting.
 - If replacement cannot reasonably occur within that timeframe due to seasonal constraints, planting will

occur during the next appropriate planting season.

- Long-Term Commitment
 - The Applicant acknowledges that the vegetative buffer must remain effective for the operational life of the SEF. The final Vegetation Management Plan (to be provided prior to construction) will therefore:
 - Use mandatory language (“shall” and “will”)
 - Assign defined responsibility
 - Establish inspection frequency
 - Establish corrective timelines
 - Include contact information for responsible parties

11. Section 212.3 A. d. (a list of places where an SEF may NOT be sited) Property listed on or eligible for the National Register of Historic Places or historic and cultural resources. The application narrative states (p 9-10) that an existing archaeological site was identified within the boundaries of the Participating Parcels. A copy of the PA-SHARE letter or other satisfactory documentation evidencing that PA-SHARE or the PA SHPO has reviewed the proposed site and determined that the development area does not impinge upon this existing archaeological site is required. No changes to this development area may be made without another review and documentation of compliance. Therefore, the parcel(s) must be identified.

- The Applicant will accept as a condition of the Conditional Use Permit to provide concurrence from PA SHPO prior to construction.

12. Section 212.3 A. 7 pg. 55 The specifications for the fencing and gates are not provided. This may be a matter for prior to land development, and we note it is missing.

- Details for Substation fencing, SEF fencing, and self-locking gates are provided in Appendix D.
- Additional details on the proposed fencing and gates are provided in Sections 3 and 26 of the Narrative. Text also provided below:
 - The proposed SEF will be fully enclosed in accordance with the requirements of the Zoning Code. The primary perimeter fence will consist of an eight (8) foot tall fence equipped with self-locking gates to ensure site security and controlled access. In addition, the project substations will be enclosed by seven (7) foot tall chain link fencing topped with one (1) additional foot of barbed wire (three strands) to provide enhanced security around critical electrical infrastructure. Fencing for the Point of Interconnection (POI) switchyard will

be constructed in accordance with the requirements of the interconnecting utility. At this time, it is anticipated that the POI switchyard will be enclosed by a seven (7) foot tall chain link fence topped with three (3) strands of barbed wire, consistent with typical utility security standards and shall comply with the National Electrical Safety Code.

- 13.** Section 212.3 A. 8 pg. 55 Requires a 20 foot cart-way around the inside of the perimeter fencing. We do not see this provided on the plans around the entire facility areas. We see a partial perimeter road along the WV-PA border and cart-ways inside the facility, but no indication of the required perimeter cart-way. This should be on the conditional use plans and is a requirement to comply with the ordinance. Correct the plans to show the required perimeter cart-way.
- The existing site plan includes a 20-ft wide cart-way around the inside of the perimeter fence. Labels have been added to the Site Plan and Section 3 of the Narrative includes a description of the cart-way.
- 14.** Section 212.3 A. 9 pg. 56 specifies lighting requirements. Plans for these do not appear in this CUP. Require a lighting plan.
- Details of the lighting plan have been added to Section 27.1 of the Narrative. Below is the text added to Section 27.1.
 - The proposed lighting at the SEF will be limited strictly to what is necessary for safety and security purposes. Specifically, lighting is proposed at:
 - SEF entrance gates
 - The collector substation
 - The Point of Interconnection (POI) switchyardFor all SEF-owned facilities (entrances and collector substation), lighting will:
 - Be directed downward and fully shielded to prevent light spillover
 - Utilize motion sensors to ensure lights are activated only when necessary
 - Be limited to the minimum intensity required for safety
 - Use warm-colored fixtures
 - Conform to recognized “dark sky” best practices
 - Regarding the POI switchyard, this facility will ultimately be owned, operated, and maintained by the interconnecting electric utility. As such, lighting design and operational standards for the POI switchyard must comply with the utility’s engineering, safety, and operational requirements.

These standards are established to meet industry reliability and worker safety obligations.

If you have any questions, please call me at 636-459-0335 or email (bfisher@revrenewables.com) and we can discuss responses to your comments. Thank you for your time and consideration.

Very truly yours,

A handwritten signature in black ink that reads "Ben Fisher". The signature is written in a cursive, flowing style.

Ben Fisher
Project Manager
Cornerstone Solar, LLC