

February 26, 2026

Harshman CE Group, LLC
Attn: Sean O'Dell, PE
2455 Park Ave
Washington, PA 15301

Subject: Cornerstone Solar – CUP Application
Technical Review Comment/Response

Dear Mr. O'Dell,

Thank you for your comments on the Cornerstone Solar, LLC consolidated conditional use application (CUP). Provided below are your 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. The project plan proposes the construction of underground and overhead power transmission lines, linking proposed solar modules. However, the plan does not show the proposed connection to the main power grid. Section 210.12.2 indicates that all Conditional Use applications including power line installations shall show all proposed connections to the main line on the site plan, including information for affected parcels. The connection to the mainline must be shown on the plans.
 - The point of interconnection (POI) is the 345kV line located on the WV/PA border. The responsible utility (FirstEnergy) will split the 345kV line and direct the line into the POI substation. The site plan will be updated to show the approximately 200-ft long 345kV tie-in line from the existing 345kV line to the POI substation.
2. Section 210.12.9 indicates that all overhead electrical power transmission lines carrying over 230kV cannot be closer than 300' to a residential structure and that all underground lines can't be closer than 200' to a residential structure. The proposed transmission line from the switchyard to the substations must be shown on the site plan, including ROWs and setbacks.
 - The overhead 345kV tie-in line will be greater than 300-ft from any residential structure. The nearest residence to the 345kV tie-in line is approximately 4,500-ft.
3. The Overall Profile plan shows a 125' right-of-way for a portion of the proposed overhead power line, as well as a 70' pole height for one pole within that right-of-way. Section 210.12.4 indicates that the minimum setback (ROW) on each side for overhead power lines must be at least 110% of the supporting structure height (pole, tower, etc.). The right-of-way must be increased accordingly.
 - The ROW for the proposed collector line has been increased accordingly. There are 24 proposed support structures, with heights ranging from 43 to 70 feet. The support structures and lines are located more than 50 feet from residential

structures, outside the 100-foot setback of non-participating property boundaries, and outside the 300-ft setback from residential and special use zones. Most—13 out of the 24—will stand at 52 feet, 9 will be 56.5 feet, while only one (1) structure is planned at 70 feet, and one is planned at 43 feet. The right of way (ROW) is set at 115 feet wide over the 52 foot poles and 125 feet wide over the 56.5 foot poles, which provides a ROW equivalent to more than 110% of the average structure height. A larger ROW of 155 feet will be provided around the 70 foot pole.

4. Construction details for proposed driveways and fences must be included with the Conditional Use plan for review of an electric substation to assure compliance with sections 210.13.6 and 210.13.8 respectively.
 - Appendix D will be updated with detail sheets for driveways and fences.
5. Section 212.1.A.1.f dictates that a Vegetative Management Plan is required. While a plan was provided, the plan itself is described as a reference document merely providing recommendations. The plan must be updated or an appendix provided to specifically address responsible parties, monitoring and oversight from the Township, and detail the need 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 personnel 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 and the Township is aware of the responsible parties to be contact with to assure compliance.
 - **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
6. Section 212.1.f indicates that Permit Applications for SEFs must have documentation regarding the site contractors performing the work and maintenance. We recommend that submittal of this information be a condition of the Conditional Use.
 - [The Applicant will accept this as a condition of CUP approval.](#)
 7. Per the Township’s adopted Washington County Subdivision and Land Development Ordinance, submission of all items described in Section 300 Land Development Plan requirements should be a condition of the Conditional Use application. This includes submittal of complete site plans, sewage planning module, water supply plans, E&S plans, stormwater management plans, existing utility plan and other items.
 - [The Applicant will accept this as a condition of CUP approval.](#)
 8. The applicant stated the project area and vicinity was reviewed through the PASHARE program, however they did not submit the PA-SHARE response. We recommend that a condition of Conditional Use be that the applicant 1. Provides the PA-SHARE submission receipt letter and 2. Any and all environmental / archaeological studies required per the PA-SHARE letter are completed prior to land development approval and construction.
 - [The Applicant will accept this as a condition of CUP approval.](#)
 9. The Executive Summary indicated that a wetland delineation was completed; but the wetland delineation was not included with the application. We recommend that as a condition of the Conditional Use the applicant provide a copy of the study for review.
 - [The Applicant will accept this as a condition of CUP approval.](#)
 10. Please note the site plan and land development shall follow items in Section 212.1 and 212.3 outlining the standards and conditions for Solar Energy Facilities. Any variance or modification sought during the permit application and plan review process must be submitted.
 - [Noted.](#)

General Comments

1. The overall project plan shows continuous areas of panels crossing property lines and rights-of-way throughout the plan, including mapped roadways. It also shows an area in the northern portion marked as ‘Excluded from Purchase’. Will Cornerstone Solar, LLC be purchasing any property to implement the proposed plan or will all necessary land be leased from current owners?
 - [All necessary land to develop the project will be purchased or leased. The Project also includes easement agreements for the collector line.](#)
 - [Appendix A, Figure 4, and Appendix B, Table 1, have been updated to](#)

- show which parcels would be purchased/leased/easement.
2. If there are plans to purchase parcels for this project, will Cornerstone Solar, LLC be submitting a subdivision plan as part of the land development application? Any subdivision plan will be required to follow applicable Washington County and Jefferson Township Ordinances during the application process.
 - Yes, Cornerstone Solar, LLC will purchase property and a subdivision plan will be submitted as part of the land development application. The subdivision plan will follow applicable Washington County and Jefferson Township ordinances.
 3. The Jefferson Township Ordinance requires a 200' front property width to a public roadway. Should the parcel marked as "Excluded from Purchase" be a separate parcel after preparation of a subdivision plan, the developer will have to provide that parcel with the required frontage and setbacks, per the Ordinance requirements.
 - 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. Any subdivision will follow the requirements of the Jefferson Township Ordinance, or the appropriate variance will be requested.
 - 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.
 4. The plan shows proposed panels covering existing roadways/paths between McCready Road, Amspoker Road, and Halls Road. Are these public or private roadways? If they are public roadways, how will these sections be re-routed and will the new access roads become publicly accessible roadways? If private, will currently permitted access remain available for the entities that have permission? All newly created public roadways will require rights-of-way and must follow Ordinance construction standards.
 - The panels will not cover public roadways. The private roadways are located on land that will be purchased by Cornerstone Solar, LLC. The project does not include the creation of new public roadways.
 5. The project packets includes a 'Construction Transportation Plan' outlining haul routes, access points and potential conflicts with existing bus routes in that area. Roads to be used includes State and Township Roads in PA, as well as West Virginia. The developer should contact the respective State DOTs regarding possible HOP or hauling agreements. The developer should also contact respective Counties, Municipalities, and School Districts to review planned routes, potential impacts, and

required planning/agreements.

- The appropriate hauling permits will be obtained from the company responsible for transport of major equipment.
6. All federal, state, county, and local required permitting must be included with the land development application.
- Yes, all required permitting will be included in the land development application.

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,



Ben Fisher
Project Manager
Cornerstone Solar, LLC