

**DRAFT**  
**LIVINGSTON COUNTY PLANNING COMMISSION**  
**MEETING MINUTES**  
**County Administration Building**  
**304 E. Grand River Ave.**  
**Howell, Michigan**  
**June 17, 2026**  
**6:30 p.m.**

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**COMMISSIONERS PRESENT:** Matt Ikle, Dennis Bowdoin, Bill Call, Sally Witkowski, Kevin Galbraith, Chuck Wright, Margaret Burkholder

**COMMISSIONERS ABSENT:** None

**STAFF PRESENT:** Scott Barb, Rob Stanford, Martha Haglund

**OTHERS PRESENT:** Bruce Powellson, Marion Township; Tim Boal, Howell Township; Kristin Dennison, Cohoctah Township; Jodi Fulton, Howell Township.

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**1. CALL TO ORDER:** Meeting was called to order by Planning Commissioner Ikle at 6:30 PM.

**2. PLEDGE OF ALLEGIANCE**

**3. ROLL AND INTRODUCTION OF GUESTS**

**4. APPROVAL OF AGENDA:**

**Commissioner Action: IT WAS MOVED BY COMMISSIONER CALL TO APPROVE THE AGENDA DATED JUNE 17, 2026, SECONDED BY COMMISSIONER GALBRAITH.**

**All in favor, Motion Passed**

**5. APPROVAL OF PLANNING COMMISSION MEETING MINUTES:**

Commissioner Galbraith noted the vote count on case number Z-14-26 should read 5-2 not 6-2.

**Commissioner Action: IT WAS MOVED BY COMMISSIONER BOWDOIN TO APPROVE THE AMENDED MINUTES DATED MAY 20, 2026, SECONDED BY COMMISSIONER BURKHOLDER.**

**All in Favor, Motion Passed**

**6. CALL TO THE PUBLIC:** None

**7. REZONING REVIEWS:**

**A. Z-16-26 OCEOLA TOWNSHIP, TEXT AMENDMENTS**  
**SECTION 5.02: ACCESSORY BUILDINGS AND USE STANDARDS**

The Oceola Township Planning Commission proposes to amend the township zoning ordinance by adding two (2) entirely new sections to Article 5: Standards for Use, listed as new subitems Section 5.02.4 (J) & (K): Accessory Buildings and Uses - Standards, which pertains to the standards for trailer coach storage and use on residential lots.

There is potential ambiguity when comparing Sections J and K. Section K authorizes limited recreational occupancy—either incidental overnight camping or seasonal use—on residential lots. Additionally, section K does not provide replacement standards defining what level of utility connection is allowed during seasonal use. As a result, the ordinance permits seasonal camping but offers no direction on how essential functions such as water supply or wastewater management should be regulated. However, overall, the framework of Sections J and K is logically organized and aligns with common zoning objectives. Therefore, approval with conditions is reasonable and will help to ensure these clarifications are incorporated.

**Township Recommendation: Approval.** Oceola Township Planning Commission held a public hearing regarding the proposed amendments and recommended Approval of the proposed amendments during the May 12, 2026, the Regular Planning Commission meeting. Minutes of the meeting indicate that there were no public comments regarding these amendments.

**Staff Recommendation: Approval With Conditions.** Specifically, the ordinance would benefit from clearly defined utility connection standards for seasonal and incidental use, explicit recognition that temporary camping accessories are permitted during active use but not during storage, and definitional language distinguishing recreational camping from residential occupancy. Together, these modifications would close the interpretive gaps and ensure enforceability without altering the fundamental intent of the amendments.

**Recommended Actions Before Final Approval:**

- Clarify Utility Connection Allowances for Seasonal and Incidental Use. Specify whether temporary electric cords, potable water hookups, and RV waste dump procedures are permitted during camping use.
- Clarify Allowed Ancillary Items During Active Recreational Use. Amend J(6) to specify that prohibitions apply only during storage, and allow ordinary temporary camping accessories (e.g., chairs, coolers, portable grills) during permitted camping periods.
- Add Definitions for “Living or Housekeeping Purposes” vs. “Recreational Use”: This will protect enforcement consistency and reduce interpretation disputes.
- Optional: Add explicit standards for wastewater disposal during seasonal camping: Currently only J(5) applies, which prohibits discharge but does not describe expected lawful disposal (e.g., require self-contained holding tanks or off-site dumping).

**Commissioner Discussion:** Commissioner Burkholder inquired about the definition of ‘housekeeping’ that is not defined in the current ordinance. Commissioner Wright asked about the permit fee for storage of a trailer. Generators also should state a start time in the proposed amendments. Commissioner Ikle asked about extending the date to December to accommodate hunters. Commissioner Call understands the need for the \$1,000 bond, but there needs to be a process included for how the bond gets returned. Commissioner Bowdoin inquired about additional guests or visiting relatives and how the amendments regulate this. Commissioner Witkowski stated the amendments tend to be restrictive and that the nuisance section should be more thorough. Commissioner Wright also commented that prohibiting advertising (referring to subitem K.3.c) could potentially impede First Amendment Rights.

**Public Comments: None.**

**Commissioner Action: IT WAS MOVED BY COMMISSIONER BURKHOLDER SECONDED BY COMMISSIONER WRIGHT TO RECOMMEND APPROVAL WITH CONDITIONS.**

**All in Favor, Motion Passed: 7-0**

**B. Z-17-26 COHOCTAH TOWNSHIP, TEXT AMENDMENTS**  
**SECTION 1: ARTICLE 16.19 - ESSENTIAL SERVICES**

The Cohoctah Township Planning Commission is proposing to amend their Zoning Ordinance to include standards and siting regulations for essential services including electrical substations. The proposed language only permits substations within the Renewable Energy Overlay. Also, the proposed ordinance uses terms such as “participating” and “non-participating” properties. These terms are associated with state statute PA 233 of 2023 regulating Utility-Scale Renewable Energy Facilities. Although it is not specifically entitled as so, it appears the proposed ordinance is seeking to regulate substations connected to utility-scale renewable energy projects.

Under Public Act 233 of 2023, provisions are established for utility-scale renewable energy projects, specifically including 50 MW of solar energy, 100 MW of wind energy, and 50 MW of battery storage. The associated electrical substations are considered part of the “Solar Energy Facility” and are subject to oversight of the Michigan Public Service Commission (MPSC). This oversight applies unless the local municipality has adopted a Compatible Renewable Energy Ordinance (CREO), which cannot be more restrictive than Section 226(8) of PA 233. This was reinforced in a recent ruling regarding the Implementation of Provisions from Public Act 233 of 2023 (COA Docket No. 373259); in which over 75 townships (including Cohoctah Township) filed lawsuit in 2024 challenging a MPSC order implementing the 2023 law moving siting of renewable energy projects to the commission. One of the determinates was that the MSPC’s interpretation was correct, that a CERO cannot be more restrictive than PA 233 of 2023 Section 226(8).

Additionally, Cohoctah Township is in a legal dispute over a proposed utility-scale solar project, Headland Solar (Case No. U-22004). The case does not involve a disagreement over Cohoctah Township having a CREO. Instead, it focuses on whether the project received valid approval under PA 233 of 2023 when it was granted an Approval with Conditions by the Township Board in September 2025. On May 20, 2026, the MSPC released their response denying the motion for summary disposition for leave to appeal. The determination essentially concluded that approval with conditions was not valid, because PA 233 of 2023 only references an outright denial or approval of applications, omitting the possibility of a conditional approval. The case will continue to be litigated but it seems likely the MSPC may have oversight over the Headland project and any substations therein.

Staff did note that Section D states, “all substations associated with utility-scale renewable energy would be exempt from this ordinance,” and therefore essentially voids the intent of the ordinance to regulate substations in the Renewable Energy Overlay. If the intent was to regulate substations not associated with utility-scale renewable energy projects the ordinance should be revised with the understanding there is still limited local authority over high-voltage energy projects.

It would be beneficial for the township to develop guidelines for substations that are unrelated to renewable energy projects. Local authorities have the ability to regulate aesthetic standards, including screening, landscaping, and maintenance. It would require a separate section specifically tailored for substations or essential services not associated with a utility-scale renewable energy project.

**Township Planning Commission Recommendation: Approval.** The Cohoctah Township Planning Commission held a public hearing on April 7, 2026. There were no public comments noted in the township minutes. The Planning Commission recommended approval at their May 07, 2026, meeting.

**Staff Recommendation: Disapproval.** The proposed zoning ordinance has been thoroughly reviewed. The ordinance conflicts with state statute by imposing more restrictive regulations than those outlined in PA 233, Section 226(8) of 2023, particularly concerning setbacks, sound levels, and potentially others. If the MSPC retains siting authority over the disputed Headland Solar Project this ordinance will be void. It would be more beneficial to focus efforts on what is under the local jurisdiction.

**Commissioner Discussion:** Commissioner Wright inquired if PA 233 were not involved if the proposed amendments could be approved or not. Commissioner Witkoski commented that the standards could still regulate substations not associated with utility-scale renewable energy projects.

**Public Comments:** Kristin Denniston, Cohoctah Township, spoke on her concerns over the proposed ITC substation and wants to proactively plan for future substation projects.

**Commissioner Action: IT WAS MOVED BY COMMISSIONER CALL, SECONDED BY COMMISSIONER GALRAITH TO RECOMMEND DISAPPROVAL.**

**All in favor, Motion Passed: 6-1  
NAY: WRIGHT**

**8. OLD BUSINESS: None.**

**9. NEW BUSINESS: 2027-2032 Livingston County CIP Resolution for Approval:** Principal Planner Stanford gave an overview of the 2027-2032 Livingston County Master Plan.

**Commissioner Action: MOTION BY COMMISSIONER BOWDOIN TO APPROVE THE LIVINGSTON COUNTY 2027-2032 CAPITAL IMPROVEMENT PLAN, TO BE FORWARDED TO THE LIVINGSTON COUNTY BOARD OF COMMISSIONERS FOR THEIR RECEIPT FILING AND USE AS NECESSARY AND APPROPRIATE, SECONDED BY COMMISSIONER BURKHOLDER.**

**COMMISSIONER BOWDOIN CALLED FOR A ROLL CALL VOTE.**

**IKLE: Yes  
CALL: Yes  
BOWDOIN: Yes  
BURKHOLDER: Yes  
GALBRAITH: Yes  
WRIGHT: Yes  
WITKOWSKI: Yes**

**All in favor, Motion Passed: 7-0**

**10. REPORTS**

- A. PLANNING CONTRACTS WITH TOWNSHIPS:** A brief discussion regarding proposed contracts with local Townships.
- B. BROWN BAG LUNCH:** June 24, 2026, Oceola Township, Land Division Act Updates

**11. COMMISSIONERS HEARD AND CALL TO THE PUBLIC:**

**12. ADJOURNMENT**

**Commissioner Action: MOTION BY COMMISSIONER CALL SECONDED BY COMMISSIONER GALBRAITH TO ADJOURN AT: 7:38 P.M.**

**All in Favor, Motion Passed**

# Resolution

## Livingston County Planning Commission

### TRANSMISSION OF THE

### APPROVED COUNTY 2027-2032 CAPITAL IMPROVEMENT PLAN

### TO THE LIVINGSTON COUNTY BOARD OF COMMISSIONERS

**WHEREAS**, a Capital Improvement Plan allows for the planning of projects over a certain period of time; and

**WHEREAS**, County Departments are requesting to be financed with County funds to build, renovate, or buy equipment, infrastructure or property to be used as a public asset or to benefit the public; and

**WHEREAS**, a capital project is defined as a project large in size, having a cost in excess of \$50,000, and a useful life greater than 3 years; and

**WHEREAS**, the Capital Improvement Plan is prepared per a policy laid out in the Debt Management Policy, which states that the County Planning Commission, in collaboration with the County Department of Planning, will annually prepare a multi-year inventory identifying projects approved or anticipated by various County departments, which is supported by **Board Resolution #702-288**; and

**WHEREAS**, inasmuch as the County Planning Commission has an adopted County Master Plan, the County Planning Commission must be included in the formal review process of proposed County Department Capital Improvement Plan projects (**Michigan Planning Enabling Act, Act 33 of 2008 - MCLA 125:3831 and 125:3865-3867**); and

**WHEREAS**, to make informed decisions, prioritize needs, and plan for fiscal requirements it is beneficial to include Department capital project requests for the upcoming year(s) in both the Capital Improvement Plan and the annual budget process; and

**WHEREAS**, it is the recommendation of the County's Planning Department and County Administration that the Capital Improvement Plan process be incorporated into the annual County Budget Process and that all County Departments with requests for projects with estimated costs in excess of \$50,000 participate in providing the information requested to be included in the Capital Improvement Plan; and


**WHEREAS**, that the Livingston County Board of Commissioners has approved that the annual Capital Improvement Planning (CIP) process be incorporated with the annual Operating Budget Process and County Departments with projects in excess of \$50,000 participate in completion of the CIP.

**THEREFORE BE IT RESOLVED** that the Planning Commission will continue to review and transmit the Livingston County Capital Improvement Plan annually to the Livingston County Board of Commissioners to formally receive and file the report, and

**BE IT FURTHER RESOLVED** that the Livingston County Planning Commission herein transmits the 2027-2032 Livingston County Capital Improvement Plan to the Livingston County Board of Commissioners and requests that the Board formally receive, file, and utilize the report as appropriate and necessary.

Approved: 

Matt Ikle, Chair

Attest: 

Scott Barb, Planning Department Director

**On This Date: Wednesday, June 17, 2026**

**LIVINGSTON COUNTY PLANNING COMMISSION**

Matt Ikle, Chair  
William Call, Vice Chair  
Kevin Galbraith, Secretary  
Dennis Bowdoin  
Margaret Burkholder  
Chuck Wright  
Sally Witkowski