

1 STATE OF MICHIGAN

2 COUNTY OF OTTAWA

3
4 IN RE: HIGHLAND DRIVE DRAIN

5 BOARD OF DETERMINATION

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8 Proceedings commenced at 10:00 a.m., on Wednesday,
9 March 2, 2022, at the Hudsonville City Hall,
10 3275 Central Boulevard, Hudsonville, Michigan, before
11 Lauret J. Henry, CSR-6469, Certified Shorthand Reporter
12 and Notary Public.

13
14 APPEARANCES:

15 Mr. Joe Bush, Ottawa County Water Resources Commissioner

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17 Mr. Bill Cargo, Board Chairman
18 Mr. Rich VanderKlok, Board Secretary
19 Mr. Josh Westgate, Board Member

20 Mr. Paul Forton, Engineer, Spice Group
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1 Hudsonville, Michigan

2 March 2, 2022 - 10:00 a.m.

3 PROCEEDINGS

4 WATER RESOURCES COMM. JOE BUSH: Well good
5 morning, everyone. My name is Joe Bush. I'm the
6 Ottawa County Water Resources Commissioner. I
7 appreciate you coming to the Board of Determination.
8 And you're probably wondering, well, why are we here?
9 So part of the process to have a project or look into a
10 situation, it requires a petition if it's not a county
11 drain. Today we're here to look at some infrastructure
12 in part of the city of Hudsonville that's not under my
13 jurisdiction currently.

14 So in order to bring something under my
15 jurisdiction, the first start of the legal process, the
16 Drain Code, is to actually have a petition. And we got
17 a petition from the city council to look into this and
18 figure out, you know, does this Board of Determination,
19 this three-panel board, make a judgment call, or in
20 testimony today, so it's a public hearing, and
21 everything is court recorded with our court recorder,
22 for future reference.

23 So as she's taking minutes -- by the way, I just
24 want to make it known that they will be on the Web site
25 usually about four to six weeks later on miottawa.org.

1 Look under the projects, petition project, and those
2 minutes will be on there. Or if you don't have access
3 to the internet, we're more than happy to give you a
4 hard copy as well.

5 So everything is court recorded, and that's not
6 required by law. But I do it so you're protected as
7 the property owner or in the district or the city or
8 the county or anybody else, the engineering firm, it's
9 what did Joe say and why are we here. And it's just
10 easier to track it when it's court recorded than try to
11 figure out who said what later on down the road.

12 So I do appreciate your time coming this morning
13 to hear about it and basically why are you here. So in
14 the Drain Code I have to appoint three gentlemen. They
15 don't have any jurisdiction or they do not live in this
16 area, and they do not have any affiliation with any of
17 the businesses or anything to do with this said
18 property we're talking about, but they are in Ottawa
19 County.

20 I appoint people who have had past experience in
21 their own municipality, whether a city manager, whether
22 it's a township supervisor, or whether they're on the
23 township board. They understand, Number 1, Drain Code
24 pretty well, because these three gentlemen have been
25 doing these, especially the one in the center, he's

1 been doing these for a number of years.

2 BOARD MEMBER BILL CARGO: Number of decades.

3 WATER RESOURCES COMM. JOE BUSH: So they're
4 not here to say you need a project that's going to cost
5 X. They're not here for a project. They're not here
6 to say, you're going to spend X amount of money or give
7 you a budget. They have no idea what we're talking
8 about today. But they're here to hear the engineer's
9 presentation, which we have Spicer Group today, Paul
10 Forton and Noah, who will give a little presentation on
11 what they've seen in the field. But their presentation
12 is only observation, it's not a solution, because we
13 haven't technically hired them as far as anything than
14 what's preliminary. So they have only been out there,
15 here's what we got, here's what we might be able to do,
16 but we can't do anything until the Board of
17 Determination says, Joe, move forward with a project.

18 And then they don't set a budget. Once they say,
19 Joe, move forward with a project, their hands are --
20 they have done what they're supposed to do per Drain
21 Code, per state law. So we don't know what the final
22 project looks like because we haven't even gotten that
23 far yet. So this is just the beginning of the process.

24 These three gentlemen have, like I said, they know
25 drainage, they know drain law, and they know the

1 purpose of what their role is today, which is
2 technically hear testimony, hear the issues, and make a
3 vote. Because I will -- once they're sworn in, they
4 run the board meeting, and they'll actually elect a
5 chair and a secretary and kind of go through the role
6 of, here's our roles, and we want to hear what the
7 issues are out there, and should this fall under the
8 Water Resources Commissioner and his jurisdiction.

9 Right now there's issues where we're going to be
10 talking about, especially in the Highland Drain, that
11 has been issues for years, but it's technically an
12 orphan. What an orphan is, there's no responsibility.
13 There's nobody to pay for it. And you got to put
14 together a drain district. Everybody lives in a drain
15 district somewhere. Somebody's water goes somewhere.
16 In order to fix this with the county, you have to,
17 again, start this legal process.

18 So that's kind of in a nutshell or why we're here
19 today, the role this three-panel board has. I'll give
20 introductions in a second into why the city petition,
21 because the city in this area, it's not really their
22 jurisdiction either, is it really the property owner's
23 responsibility? A lot of them say, well, I might live
24 there and own the property, but I'm getting water from
25 everybody else upstream or downstream and it just

1 passes through, so why should I have to fix everything
2 and pay for it when everybody is using that said
3 utility. A lot of the storm water, whether it's open
4 ditch or drain or whether it's enclosed pipe or storm
5 sewer, it's still a utility. People use it upstream,
6 downstream, and benefit from it.

7 So what we walk away with today is technically not
8 what it costs because we don't know the cost. We don't
9 have a project, but we do know the issues. And what's
10 the timeline on this? It's nothing that really happens
11 too quickly, but there's a whole 'nother process that
12 happens after today's meeting if they said, oh, yeah,
13 we're going to move forward and, Joe, we're going to
14 put this in your hands. Or they could say, no, we
15 don't really see an issue. It's not really going to
16 fall under you, Joe. Should be under the property
17 owner or whatever. I'm not speaking for them. But
18 they can turn it down, today's Board of Determination,
19 and then it remains an orphan, and the city, myself,
20 nobody else has jurisdiction over it and it just kind
21 of remains what it is and it doesn't get fixed
22 probably, more than likely, because it's been the said
23 way we'll see for a long time. This didn't happen over
24 a couple years. It's been this way for a while.

25 In today's standards, if this was reviewed today

1 in 2022, we probably would do things differently. But
2 this is aged infrastructure and it was somewhat
3 probably approved, but, you know, it wasn't maintained
4 maybe properly because of the jurisdiction. That's
5 what it comes down to, who's overseeing it, who's
6 inspecting it, and who's fixing it when there is
7 issues. Does that put the blame on anybody? It's not
8 the city's really responsibility sometimes. It's not
9 the county. It's not the township. It's not MDOT.
10 Because it just doesn't fall; it's an orphan.

11 So at this time I'll go ahead and introduce my
12 board -- well, I'll introduce we got, again, Spicer
13 Group, and then we got the city manager, he's here
14 today, and then we have Bob, the city -- I want to say
15 the director of public works, right?

16 PUBLIC WORKS SUPERINTENDENT ROBERT MILLER:
17 Superintendent.

18 WATER RESOURCES COMM. JOE BUSH: And then we
19 have our court recorder. And then I'll go ahead and --
20 then we got my staff here. Because everything is court
21 recorded, so I'll make sure my staff is introduced. We
22 have Josiah, Marie, and Katie that are here with me
23 today. And then I'll go ahead and introduce the board.
24 From right to left we have Rich VanderKlok is from
25 Georgetown Township. He was a board member over there

1 for many years, and he's also been a part of these BODs
2 for a long time. Bill Cargo is in the center. He's
3 superintendent of Grand Haven Township, or manager.
4 He's been doing these for, like he said earlier,
5 decades. Then we got Josh Westgate. He used to be a
6 supervisor over at Wright Township, but he's been
7 involved in drainage and Drain Code and doing these
8 BODs for me as well.

9 So, again, they don't have any affiliation with
10 any properties upstream, downstream, drain district,
11 city of Hudsonville. When I appoint people, Number 1,
12 they got to live in Ottawa County, and Number 2, they
13 can't be in the district. That wouldn't be quite fair.
14 They're not township board members. As far as city
15 council members, here it's city. So they're not city
16 council members. So they don't get to make a judgment
17 call based on cost or what's it going to cost who or
18 what. This is not today's discussion, nor is it their
19 job to do that.

20 So at this time, gentlemen, please rise and raise
21 your right hand. Do you each solemnly swear that you
22 will faithfully perform and discharge the duties
23 imposed upon you as required by law as members of the
24 Board of Determination appointed by the Ottawa County
25 Water Resources Commissioner to determine a necessity

1 to locate, establish, and construct the proposed
2 Highland Drive Drain located in the city of Hudsonville
3 in said county?

4 BOARD MEMBER JOSH WESTGATE: I do.

5 BOARD MEMBER BILL CARGO: I shall.

6 BOARD MEMBER RICH VANDER KLOK: I do.

7 BOARD MEMBER BILL CARGO: The first thing we
8 need to do is to do the election of officers for this
9 board. Is there a motion to appoint a chairperson?

10 BOARD MEMBER RICH VANDER KLOK: I'll make a
11 motion that Bill Cargo serve as chair.

12 BOARD MEMBER JOSH WESTGATE: I will support
13 that motion.

14 BOARD MEMBER BILL CARGO: We have a motion
15 and support, so all in favor say aye.

16 BOARD MEMBER JOSH WESTGATE: Aye.

17 BOARD MEMBER BILL CARGO: Aye.

18 BOARD MEMBER RICH VANDER KLOK: Aye.

19 BOARD CHAIR BILL CARGO: And then I get to
20 move forward with the appointment of a secretary for
21 this Drain Board, and since I see that you have
22 secretary written on your papers over there I'm
23 assuming it's going to be you, Rich, so I will make a
24 nomination for Rich to be the secretary of this Board
25 of Determination. Is there support?

1 BOARD MEMBER JOSH WESTGATE: I will support
2 that.

3 BOARD CHAIR BILL CARGO: Got support from
4 Josh. All in favor say aye.

5 BOARD MEMBER JOSH WESTGATE: Aye.

6 BOARD CHAIR BILL CARGO: Aye.

7 BOARD MEMBER RICH VANDER KLOK: Aye.

8 BOARD CHAIR BILL CARGO: All that is also
9 handled.

10 Briefly we'll talk about some rules for public
11 comment. First I'm going to make a motion to limit
12 public comments to the length of three minutes. We do
13 that because you can summarize War And Peace in three
14 minutes, and so we think that you should be able to
15 explain why you support or do not support this drain
16 project within the same period of time.

17 So I'll make the motion to limit public comments
18 to three minutes. Do I have support?

19 BOARD MEMBER JOSH WESTGATE: I'll support
20 that.

21 BOARD CHAIR BILL CARGO: I have support from
22 Josh. Any comments? All in favor say aye.

23 BOARD MEMBER JOSH WESTGATE: Aye.

24 BOARD CHAIR BILL CARGO: Aye.

25 BOARD SECRETARY RICH VANDER KLOK: Aye.

1 BOARD CHAIR BILL CARGO: It is also adopted.

2 At this stage then we're going to -- and we've
3 already outlined what the reason we're here for, Joe
4 did that prior to the meeting, and so I'm going to move
5 straight to the engineer's presentation. Paul is it
6 going to be you giving the presentation today? So Paul
7 will be giving the presentation, and he is with the
8 Spicer Engineering Group.

9 ENGINEER PAUL FORTON: Thank you, Bill.
10 Again, thank you, Joe, as well, for the intro. It does
11 make it a little bit easier to make sure that we're all
12 on the same page and understand what's going on. If
13 you have questions, Board, at any time, feel free to
14 stop and ask.

15 So as we go through the presentation, we'll give
16 you guys a little bit of a bearing on where we are,
17 where the location of the drain is, talk briefly about
18 the background of the drain, show you some photos of
19 the existing condition on the inspection we completed,
20 and then if there is any additional questions after
21 that, we can go through those as well.

22 So as far as a location, we're out toward the
23 highway. If you leave here and head south toward the
24 highway, you hit the light there by McDonald's. If you
25 turn left and go east, that's Highland Drive. There's

1 a car dealership right there on the south side, and
2 this storm sewer is tucked away on the north side of
3 the road just across from the dealership.

4 So this is what you see -- can you gentlemen see
5 this on your screens as well?

6 BOARD MEMBER JOSH WESTGATE: Yes.

7 ENGINEER PAUL FORTON: So what you'll see
8 here is we have the drainage district boundary shown in
9 yellow. Joe mentioned the district boundary during his
10 presentation. That's essentially the watershed that
11 feeds water to this particular system. And we have got
12 a few flow arrows that I'm going to add. You can see
13 that there's some light blue -- there's a light blue
14 arrow that has appeared on your screen. That's
15 designating which way the flow is going. And the dash
16 lines that you see within the road right-of-way, those
17 are existing storm sewers that we know about from the
18 inspection that we have completed.

19 And so as Joe mentioned, this particular storm
20 sewer is an orphan, and it doesn't have any
21 jurisdiction over it to do any repairs. So that is
22 part of the reason, or the main reason that we're here
23 today.

24 So the storm sewer in front of the dealership
25 flows to the east, and that continues on until it

1 reaches the midpoint here, and you'll see a stub that
2 goes north. The storm sewer turns and goes north and
3 outlets into a natural ravine. The storm sewer on the
4 east end proceeds west toward that same center point,
5 and that as well then routes to the north. Once it
6 outlets through the storm sewer, it proceeds through a
7 natural waterway, through a wetland complex, and then
8 again in a north to northeasterly direction.

9 Again, we have talked about how this is an orphan
10 drain storm sewer system. The main component being in
11 the road right-of-way is storm sewer, but once it does
12 outlet, there a creek there, an open drain. Many times
13 we're asked, where is this going to start and stop.
14 The primary purpose for this system is to take over
15 what's in the road right-of-way. The idea is not to
16 bring in private drainage from the parking lots and the
17 businesses that are next door. How far downstream we
18 go, if the project is found necessary, will be
19 dependent on easements that are obtained from
20 landowners, and so there might be a portion of this
21 that is open stream, but that remains to be seen.

22 The watershed itself is approximately 30 acres,
23 and so we're looking at about 30 acres of ground that
24 drains to this point through this storm sewer, and it
25 serves mostly commercial and industrial properties.

1 This is a picture of the outlet, so this will be facing
2 south, and Highland Drive is right there on the skyline
3 in the background that you can see. And so there is a
4 rusted-out steel culvert that you can see in the
5 foreground, and then there's a concrete pipe that
6 protrudes from the slope. And you'll notice the large
7 scour hole that proceeds around that outlet.

8 And I don't have knowledge of what was here
9 before. Many times I would have anticipated seeing
10 perhaps a manhole here. I can't tell you why there's a
11 steel culvert there. Perhaps they slipped a steel pipe
12 on to expand that slope. But what we do know is that
13 the scour hole does contribute sediment downstream, and
14 this is something that we would look to stabilize
15 through a solution.

16 Looking downstream from this point, you'll see the
17 next photo here, very typical with our open drains
18 right now. There's a lot of woody debris that needs to
19 be managed. We're primarily seeing a lot of dead ash
20 and elm. We're still seeing Dutch elm disease taking
21 out trees and the emerald ash borer.

22 This one is a little bit unique in how it's
23 littered with the woody debris. Fortunately right now
24 most of it is spanning the drain and so the water can
25 slip up underneath it. But it's just a matter of time

1 before these limbs start to rot off and drop down into
2 the flow and further cause erosion. And I would note,
3 too, on both the left and right bank you can see that
4 the banks are vertical. There's another picture just
5 further downstream about 50 yards where you can see
6 some of the erosion on the right bank there. And
7 another photo where we don't have these side slopes
8 that we would like to see with a gradual side slope,
9 we're seeing vertical slopes, so what this means is
10 this stream channel is trying to stabilize. And so
11 this would be part of -- hopefully part of the project
12 if we got easement over this area to repair that.

13 So overall I would say the system is in poor
14 condition. Certainly the outlet is in poor condition.
15 I'm not aware of any issues with storm sewers in the
16 roads. We didn't see any evidence of sink holes or
17 repairs. The primary concerns that we have identified
18 through our preliminary investigation is simply the
19 outlet is in extreme disrepair, and we have severe
20 erosion downstream.

21 So at this point I would open the floor to any
22 questions that you folks may have, or if I've breezed
23 over anything too quickly feel free to take questions
24 at this time.

25 BOARD CHAIR BILL CARGO: I think that was a

1 good presentation. It seemed to be pretty simple and
2 straightforward with regard to the drain. If there
3 aren't any objections, I'll open up the portion of this
4 Board of Determination meeting to public testimony, and
5 we'll take public comment. First, of course, we go to
6 the municipality. I see that the city manager is here.
7 Patrick, do you have anything that you would like to
8 put on the record?

9 CITY MANAGER PATRICK WATERMAN: The city is
10 in support of this project. We have concerns with the
11 degradation of the structure and would like to get it
12 under controlled ownership of the drainage district.
13 So we would voice our support for creating a district.

14 BOARD CHAIR BILL CARGO: Then we have the
15 township superintendent, and does this go into the
16 township also, this drain?

17 PUBLIC WORKS SUPERINTENDENT ROBERT MILLER:
18 No, public works superintendent for the city.

19 BOARD CHAIR BILL CARGO: Public works
20 superintendent. Then any questions? Have you
21 maintained it up to this point?

22 PUBLIC WORKS SUPERINTENDENT ROBERT MILLER: I
23 second what Patrick said, we maintain the
24 infrastructure in the ground under the road but not to
25 the extent beyond the outfall right now where most of

1 the presentation involved.

2 BOARD CHAIR BILL CARGO: I appreciate it.
3 That said, I'll open it up for public comments.
4 Typically we go row by row, and I know nobody in the
5 first row is going to make any comments. I know the
6 second row left side nobody is going to make any
7 comments. On my right side is a gentleman. Would you
8 like to make any public comments?

9 UNIDENTIFIED SPEAKER: No comment.

10 BOARD CHAIR BILL CARGO: Okay. I'll go to
11 the back row immediately behind him, are there any
12 public comments?

13 UNIDENTIFIED SPEAKER: No comment.

14 BOARD CHAIR BILL CARGO: Then I don't think
15 there are any public comments in the last row over
16 there. Boy, this is going to be the Jimmy John's of
17 meetings for the Board of Determination it looks like.
18 In that case, I will close the portion of this meeting
19 to public comments and we'll move forward with making a
20 determination on the necessity of this orphan drain
21 being brought into the county drain system.

22 Rich, do you have any comments you'd like to make?

23 BOARD SECRETARY RICH VANDER KLOK: Other than
24 just reiterating what Paul said, and of course we seen
25 that the outlet has failed and with the severe erosion

1 downstream, so I'm in favor of bringing this orphan
2 drain into the Ottawa County Water Resources.

3 BOARD CHAIR BILL CARGO: Josh, any comments?

4 BOARD MEMBER JOSH WESTGATE: No, this appears
5 to be a pretty straightforward request. It appears to
6 make good logical sense to bring this in the county
7 drain district.

8 BOARD CHAIR BILL CARGO: I tend to agree
9 there's an awful lot of empirical area, that's 31 acres
10 that's feeding into the drain system there, so we know
11 that it has to be taking quite a bit of water in a
12 heavy rain event, so I agree it should be brought under
13 the control of the county drain commissioner. So to
14 that end, I will make a motion that the proposed
15 Highland Drive Drain as petitioned on January 5, 2022,
16 is necessary and conducive to public health,
17 convenience, and welfare. Is there support?

18 BOARD SECRETARY RICH VANDER KLOK: I'll
19 support that.

20 BOARD CHAIR BILL CARGO: We have a motion and
21 support by Rich for this. Any further comments?

22 BOARD MEMBER JOSH WESTGATE: No.

23 BOARD SECRETARY RICH VANDER KLOK: No.

24 BOARD CHAIR BILL CARGO: All in favor say
25 aye.

1 BOARD MEMBER JOSH WESTGATE: Aye.

2 BOARD CHAIR BILL CARGO: Aye.

3 BOARD SECRETARY RICH VANDER KLOK: Aye.

4 BOARD CHAIR BILL CARGO: That motion on the
5 decision as to necessity is approved. We're at the end
6 of the meeting. I think we will ask Joe to explain the
7 appeals process, and then we will adjourn.

8 WATER RESOURCES COMM. JOE BUSH: Yeah, so
9 after our decision is made if anybody wants to appeal
10 today's decision, you can do that through the Ottawa
11 County Probate Court. You got 10 days from today to be
12 able to do that if anybody so chooses to appeal.

13 CITY MANAGER PATRICK WATERMAN: Can I ask a
14 question on the presentation? Can you put the map
15 back up? I want to clarify the district. The red line
16 or the yellow line on this map, is that still subject
17 to change?

18 ENGINEER PAUL FORTON: Yeah, so that is
19 subject to change through the process. For example, if
20 we were able to obtain easement downstream, that
21 district would change downstream based on final design
22 and such.

23 CITY MANAGER PATRICK WATERMAN: As I see it,
24 a lot of the erosion issues are where that blue arrow
25 pointing north is, and the district may be expanded.

1 And then also I have concerns about the runoff from the
2 Highbrook development right there, parking lot that
3 they may be contributing as well. Just want to clarify
4 that might be still different than what's shown today.

5 ENGINEER PAUL FORTON: And the legalese
6 terms, I'm not a lawyer but I'll play one on T.V. for a
7 minute here, basically what we'll do is once we
8 finalize the design, Joe will issue a final order, and
9 that will designate the route and course where the
10 center line of the stream and storm sewer is that
11 you're taking over as well as that drainage district
12 boundary that correlates to that. For example, if we
13 bring in or add a branch or extend downstream far
14 enough to bring in that development, that would all be
15 potentially described if we got an easement that far as
16 a county drain.

17 CITY MANAGER PATRICK WATERMAN: If there is
18 additional property owners that are included in that as
19 a result of that and they weren't noticed as part of
20 this today, what is the process for that?

21 ENGINEER PAUL FORTON: So, again, I'm not a
22 lawyer but I'll play one on T.V., I would think that
23 they would want to reconvene the Board of Determination
24 at that point because those land owners did not receive
25 a notice. If we were expanding that district beyond

1 where we are today, I think they would reconvene the
2 Board of Necessity, this particular instance here, and
3 redo it at that point. That way everybody has due
4 justice and they aren't blindsided, for example, by
5 being added to a district. I could be wrong on that,
6 but correct me if I'm wrong.

7 WATER RESOURCES COMM. JOE BUSH: No, you're
8 right.

9 ENGINEER PAUL FORTON: I'm pretty sure that
10 would be the process.

11 WATER RESOURCES COMM. JOE BUSH: Today is
12 just a preliminary. It can always be bigger, but the
13 other issue we got is permitting. And there's wetlands
14 downstream, so I won't be digging in the wetlands. I
15 won't be impacting that, because it's good storage and
16 habitat and probably good water quality cleaning down
17 there in that wetland area, so we're going to protect
18 that. So we're only going so far anyway. Even if
19 there is, you know, we want to stop erosion by all
20 means for water quality and we want to stabilize it,
21 but getting any further like down in this area, that's
22 all wetland. I'm going to be real cautious touching
23 it, getting easements, maybe getting easement around
24 through it, but we wouldn't do any work in it because I
25 want to protect it because the habitat is amazing I'm

1 sure down there. Just by looking at it, I see
2 wetlands. I'm sure the habitat is frogs, snakes, all
3 the other good turtles. We want to make sure we
4 protect all that downstream.

5 BOARD CHAIR BILL CARGO: And we could
6 probably carry on that conversation afterward, so
7 unless there are -- do you need to do anything on
8 appeals?

9 WATER RESOURCES COMM. JOE BUSH: No, just you
10 got 10 days from today, if anybody wanted to appeal
11 through probate court there's a way to do that. Not
12 through my department, through probate court. So
13 that's all I got on the appeal process.

14 BOARD CHAIR BILL CARGO: With that stated
15 then I'll take a -- without objection, we will adjourn
16 the meeting. We are adjourned.

17 (BOD adjourned at 10:27 a.m.)

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CERTIFICATE

STATE OF MICHIGAN)
) SS:
COUNTY OF OTTAWA)

I certify that this transcript, consisting of 23 pages, is a complete, true, and correct record of the Board of Determination - Highland Drive Drain held on March 2, 2022.

LAURET J. HENRY, CSR-6469
Registered Professional Reporter
Notary Public, Allegan County, Michigan
Acting in Ottawa County, Michigan
My commission expires: 07/17/27
Dated: This 7th day of March, 2022

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1 3:23 8:11	agree 18:8,12	back 17:11 19:15	Bob 7:14	chair 5:5 9:11, 19 10:3,6,8, 21,24 11:1 15:25 16:14, 19 17:2,10,14 18:3,8,20,24 19:2,4 22:5,14
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