



COMMONWEALTH of VIRGINIA

Commonwealth Transportation Board

Shannon Valentine
Chairperson

1401 East Broad Street
Richmond, Virginia 23219

(804) 786-2701
Fax: (804) 786-2940

Agenda item # 13

RESOLUTION OF THE COMMONWEALTH TRANSPORTATION BOARD

September 15, 2021

MOTION

Made By: Mr. Rucker **Seconded By:** Mr. Johnsen

Action: Motion carried, unanimously

**Title: Limited Access Control Changes (LACCs) for I-77 Exit 41 Interchange
Improvements
Wythe County (Town of Wytheville)**

WHEREAS, on October 4, 1956, the State Highway Commission, predecessor to the Commonwealth Transportation Board (CTB), designated the Interstate Highway System, including I-77, to be Limited Access Highways in accordance with then Article 3, Chapter 1, Title 33 of the 1950 *Code of Virginia*, as amended, and established the limited access line locations and limits as “the final locations of said routes, including all necessary grade separations, interchanges, ramps, etc.”; and

WHEREAS, State Highway Project 0081-139-256, P101, R201, C501 (UPC# 116164) provides for the extension of the I-77 northbound deceleration lane, and for the reconfiguration and reconstruction of both the I-77 northbound exit loop ramp and entrance ramp at Exit 41, to realign with the current connection to Nye Road at Peppers Ferry Road to address operational and safety issues (the “Project”); and

WHEREAS, the reconfiguration and reconstruction of both the I-77 northbound exit loop ramp and entrance ramp at Exit 41 to realign with the current connection to Nye Road at Peppers Ferry Road requires an outward shift of the limited access line on the north side of the entrance ramps and approximately 200 feet of additional limited access in the southeast quadrant of the new intersection with Peppers Ferry Road as shown on the Limited Access Line Exhibits and the Limited Access Control Point Stations and Offsets Table (attached); and

WHEREAS, the Virginia Department of Transportation (VDOT) held a Design Public Hearing (“Hearing”) for the Project, including the current and proposed locations of the limited access lines, on July 15, 2021, between 4:00 pm and 6:00 pm at the Wytheville Meeting Center, 333 Community Boulevard, Wytheville, Virginia, and allowed public input to be collected concerning the request; and

WHEREAS, proper notice of the Hearing was given in advance, and all those present were given a full opportunity to express their opinions and recommendations for or against the Project as presented, their statements being duly recorded; and

WHEREAS, the economic, social and environmental effects of the Project have been duly examined and given proper consideration and this evidence, along with all other relevant evidence, has been carefully reviewed; and

WHEREAS, VDOT’s Bristol District Office has reviewed and approved the traffic analysis report completed June 4, 2020, and found that it adequately addresses the impacts from the Project and the proposed LACCs; and

WHEREAS, the Project is in compliance with National Environmental Policy Act requirements and a Categorical Exclusion was prepared under an agreement between VDOT and the Federal Highway Administration (FHWA) and approved on August 17, 2021; and

WHEREAS, the Project is located within an attainment area for all the National Ambient Air Quality Standards, and therefore the regional conformity requirements do not apply; and

WHEREAS, the Project is in the Town of Wytheville (Wythe County) and the proposed LACCs are supported by a resolution from the Wytheville Town Council dated June 28, 2021 (attached); and

WHEREAS, FHWA provided approval for State Highway Project 0081-139-256, P101, R-201, C-501 (UPC# 116164) and the proposed LACCs on August 6, 2021; and

WHEREAS, VDOT’s Chief Engineer has determined that the proposed LACCs will not adversely affect the safety or operation of the highways; and

WHEREAS, VDOT has reviewed the requested LACCs and determined that all are in compliance with § 33.2-401 of the *Code of Virginia* and that the requirements of 24 VAC 30-401-20 have been met; and

WHEREAS, VDOT recommends approval of the LACCs as shown on the Limited Access Line Exhibit and the Limited Access Control Point Stations and Offsets Table (attached).

Resolution of the Board
Proposed Limited Access Control Change (LACCs)
I-77 Exit 41 Interchange Improvements
Wythe County (Town of Wytheville)
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NOW, THEREFORE, BE IT RESOLVED, in accordance with § 33.2-401 of the *Code of Virginia* and 24 VAC 30-401-10 *et seq.*, that the CTB hereby finds and concurs in the determinations and recommendations of the VDOT made herein, and directs that the I-77 Exit 41 continue to be designated as a limited access control area, with the boundaries of limited access control being modified from the current locations as shown on the Limited Access Line Exhibits and the Limited Access Control Point Stations and Offsets Table (attached).

BE IT FURTHER RESOLVED, the Commissioner of Highways is authorized to take all actions and execute any and all documents necessary to implement such changes.

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CTB Decision Brief
Proposed Limited Access Control Changes (LACCs)
I-77 Exit 41 Interchange Improvements
Project 0081-139-256, P101, R201, C501
UPC# 116164
Wythe County (Town of Wytheville)

Issues: The area designated as limited access previously approved for the interchange at I-77 Exit 41 needs to be modified to accommodate the extension of the I-77 northbound deceleration lane, and for the reconfiguration and reconstruction of both the I-77 northbound exit loop ramp and entrance ramp at Exit 41 to realign with the current connection to Nye Road at Peppers Ferry Road. These changes require the approval of the Commonwealth Transportation Board (CTB) pursuant to § 33.2-401 of the *Code of Virginia*, and 24 VAC 30-401-10 *et seq.*

Facts:

- Limited access control for I-77 was previously established on October 4, 1956, by the State Highway Commission, predecessor to the CTB, designated the Interstate Highway System, including I-77, to be Limited Access Highways in accordance with then Article 3, Chapter 1, Title 33 of the 1950 *Code of Virginia*, as amended, and established the limited access line locations and limits as “the final locations of said routes, including all necessary grade separations, interchanges, ramps, etc.”
- State Highway Project 0081-139-256, P101, R201, C501 (UPC #116164) provides for the extension of the I-77 northbound deceleration lane, and for the reconfiguration and reconstruction of both the I-77 northbound exit loop ramp and entrance ramp at Exit 41, to realign with the current connection to Nye Road at Peppers Ferry Road to address operational and safety issues. These improvements will impact the existing limited access control lines, as shown on the Limited Access Line Exhibits and the Limited Access Control Point Stations and Offsets Table (attached).
- Virginia Department of Transportation (VDOT) held a Design Public Hearing (“Hearing”) for the Project, including the current and proposed locations of the limited access lines, on Thursday, July 15, 2021, between 4:00 pm and 6:00 pm at the Wytheville Meeting Center, 333 Community Boulevard, Wytheville, and allowed public input to be collected concerning the request.
- Proper notice of the Hearing was given in advance, and all those present were given a full opportunity to express their opinions and recommendations for or against the Project as presented, their statements being duly recorded.
- The economic, social, and environmental effects of the Project have been duly examined and given proper consideration and this evidence, along with all other relevant evidence, has been carefully reviewed.
- VDOT’s Bristol District Office has reviewed and approved the traffic analysis report on June 4, 2020 and found that it adequately addresses the impacts from the Project and the proposed LACCs.

- The Project is in compliance with National Environmental Policy Act requirements and a Categorical Exclusion was prepared under an agreement between the Virginia Department of Transportation (VDOT) and the Federal Highway Administration (FHWA) and approved on August 17, 2021.
- The Project is located within an attainment area for all the National Ambient Air Quality Standards and therefore the regional conformity requirements do not apply.
- The Project is in the Town of Wytheville (Wythe County) and the proposed LACCs are supported by a resolution from the Wytheville Town Council dated June 28, 2021 (attached).
- FHWA provided the approval for State Highway Project 0081-139-256, P101, R201, C501 (UPC# 116164) and the proposed LACCs on August 6, 2021.
- VDOT's Chief Engineer has determined that the proposed LACCs will not adversely affect the safety or operation of the highways.
- The proposed LACCs are in compliance with § 33.2-401 of the *Code of Virginia* and with the policies and requirements of the CTB contained in 24 VAC 30-401-10 *et seq.*

Recommendations: It is recommended, pursuant to §33.2-401 of the *Code of Virginia*, and 24 VAC 30-401-10 *et seq.*, that the I-77 corridor continue to be designated as a Limited Access Highway with the LACCs modified and/or established as shown on the Limited Access Line Exhibits and the Limited Access Control Point Stations and Offsets Table (attached). This action will modify the limited access line and right of way previously approved by the CTB's predecessor, the State Highway Commission, on October 4, 1956.

Action Required by CTB: The § 33.2-401 of the *Code of Virginia* and 24 VAC 30-401-10 *et seq.* require a majority vote of the CTB to approve the recommended LACCs. The CTB will be presented with a resolution for a formal vote to approve the LACCs for the Project and to provide the Commissioner of Highways the requisite authority to execute all documents necessary to implement the LACCs.

Result, if Approved: The Commissioner of Highways will be authorized to execute any and all documents needed to comply with the resolution, and the I-77 Exit 41 Project will move forward.

Options: Approve, Deny, or Defer.

Public Comments/Reactions: There were forty-two (42) citizens that attended the meeting per the sign in sheets. Seven (7) written comments were received at the hearing and one (1) comments were received by mail. There were zero (0) oral comments recorded by the court reporter at the meeting. In addition, five (5) emailed/online comments were received by VDOT.

**Minutes of the Meeting of the State Highway
Commission of Virginia, held in
Richmond
October 4, 1958**

The Commission met in the Central Office Building, Richmond, Virginia, at 9:00 A.M., Thursday, October 4, 1958. The following members were present: Messrs. E. P. Barrow, S. S. Flythe, S. D. May, Burgess E. Nelson, Wm. A. Wright and J. A. Anderson.

The meeting was called to order by the Chairman.

The Chairman read a letter from Mr. Howard O. Rogers stating that he would not be able to attend because of illness.

On motion made and seconded, the minutes of the August 9-10 meeting were approved.

Moved by Mr. May, seconded by Mr. Barrow, that the permits issued from the August 9-10 meeting to date, inclusive, as recorded in the Auditing Division, be approved. Motion carried.

Moved by Mr. May, seconded by Mr. Barrow, that the permits cancelled by the Commissioner from the August 9-10 meeting to date, inclusive, as authorized June 25, 1947, and recorded in the Auditing Division, be approved. Motion carried.

Moved by Senator Nelson, seconded by Senator Wright, that the Commission confirm award of contract on bids received August 15 for the construction of Project 1887-15-18, Route 615, Bridge and Approaches Three Creek, Southampton County, to the low bidder, Norfolk Contracting Co., Norfolk, Va., at the bid of \$102,949.41, that 10% additional be set aside to cover the cost of engineering and additional work and \$1,064.54 for work by the A. & D. Railroad, making a total of approximately \$114,500.00 chargeable to this project; to be financed 50/50 State and Federal. Motion carried.

Moved by Senator Wright, seconded by Mr. Barrow, that the Commission confirm award of contract on bids received August 15 for the construction of Project 1307-24, Route 600, S. End of Bridge over Claytons Mill Creek-0.864 Mile N. Rockbridge County Line, Augusta County, to the low bidder, Bohls Brothers, Inc., Staunton, Va., at the bid of \$67,435.15 and that 10% additional be set aside to cover the cost of engineering and additional work, making a total of approximately \$74,180.00 chargeable to this project; to be financed 50/50 State and Federal. Motion carried.

Moved by Mr. Barrow, seconded by Mr. Flythe, that the Commission confirm award of contract on bids received August 15 for the construction of Project 1881-10, Routes 681, 640, 0.01 Mile E. of W. Int. Route 661, (E. of Pizarro)-Franklin County Line, Floyd County, to the low bidder, D. E. Worley Construction Co., Rocky Mount, Va., at the bid of \$127,856.70, that 10% additional be set aside to cover the cost of engineering and additional work and \$1,226.60 for work by State Forces (not included in contract), making a total of approximately \$141,960.00 chargeable to this project; to be financed with \$71,580.00 State and \$70,520.00 Federal Funds. Motion carried.

Moved by Mr. Flythe, seconded by Senator Nelson, that, Whereas, under authority of Section 33-118.2 of the 1950 Code of Virginia, as amended, request is made by City of Warwick for payment at the base rate of \$500 per Mile annually on additional streets meeting the required standards; Now, Therefore, be it resolved, that quarterly payments at the base rate of \$500 Per Mile annually be made to the City of Warwick on additional streets totaling 11.20 miles, effective beginning the second quarter, October 1, 1956. Motion carried.

Moved by Mr. Flythe, seconded by Senator Nelson, that, Whereas, under authority of Section 33-118.2 of the 1950 Code of Virginia, as amended, request is made by City of Waynesboro for payment at the base rate of \$500 per Mile annually on additional streets meeting the required standards; Now, Therefore, be it resolved, that quarterly payments at the base rate of \$500 Per Mile annually be made to the City of Waynesboro on additional streets totaling 10.612 miles, effective beginning the second quarter, October 1, 1956. Motion carried.

Moved by Mr. Flythe, seconded by Senator Nelson, that, Whereas, under authority of Section 33-118.2 of the 1950 Code of Virginia, as amended, request is made by the Town of Wytheville for payment at the base rate of \$500 Per Mile annually on additional streets meeting the required standards; Now, Therefore, be it resolved, that quarterly payments at the base rate of \$500 Per Mile annually be made to the Town of Wytheville on additional streets totaling 0.984 Mile, effective beginning the second quarter, October 1, 1956. Motion carried.

Moved by Mr. Flythe, seconded by Senator Nelson, that, it so be declared that, Whereas, by action of the Congress of the United States, whereby all routes on the National System of Interstate and Defense Highways are to be constructed to interstate standards and whereas, one of the requirements of interstate standards is the control of access to these routes; Therefore, be it resolved that all routes on the National System of Interstate and Defense Highways within the confines of the Commonwealth of Virginia, upon determining the final location of said routes, including all necessary grade separations, interchanges, ramps, etc., are here and now designated Limited Access Highways, pursuant to Article 8, Chapter 1, Title 33, of the Code of Virginia of 1950, as amended. Motion carried.

On motion made by Senator Nelson, seconded by Mr. Barrow, the Chairman was instructed to report to the Bureau of Public Roads, at a meeting called for October 9, that the Virginia Department of Highways will undertake one-third of the cost of operation and maintenance of the proposed bridge over the Potomac River at Jones Point, with the thought that the other two-thirds shall be borne by the State of Maryland and the District of Columbia. This could be handled by written agreement looking to appropriate Federal legislation.

Re: LACC 116164 - I-77 EXIT 41 INTERCHANGE IMPROVEMENTS

On Mon, Jul 26, 2021 at 11:56 AM Lori Snider <Lori.Snider@vdot.virginia.gov> wrote:
I approve of this proposed LACC from a Right of Way & Utilities' perspective.

Thank you,
Lori

Lori A. Snider
*State Right of Way & Utilities
Director*
Virginia Department of
Transportation
(434)907-4915 cell
(804)786-5841 office
Lori.Snider@VDOT.Virginia.gov

From: Hord, Neil <neil.hord@vdot.virginia.gov>
Sent: Monday, July 26, 2021 11:53 AM
To: Lori Snider <Lori.Snider@vdot.virginia.gov>
Cc: George Rogerson <george.rogerson@vdot.virginia.gov>
Subject: Fwd: LACC 116164 - I-77 EXIT 41 INTERCHANGE IMPROVEMENTS

Lori,

Please see the attached LACC item provided for review by L&D. It is a shift in the existing limited access lines to accommodate new ramps at the I-77 and I-81 interchange. I have reviewed this item and recommend your approval. If you concur, please respond to George who is included here. Thank you.

Neil

Neil M. Hord
Program Manager Property Management
Right of Way & Utilities Division
1401 E. Broad Street, 5th Floor
Richmond, Virginia 23219
Phone: (804) 786-4079
Fax: (804) 786-1706
<http://pmi.vdot.virginia.gov/>

----- Forwarded message -----

From: Rogerson, George <george.rogerson@vdot.virginia.gov>
Date: Thu, Jul 22, 2021 at 11:30 AM

Subject: Fwd: LACC 116164 - I-77 EXIT 41 INTERCHANGE IMPROVEMENTS
To: Hord, Neil <neil.hord@vdot.virginia.gov>
Cc: Vernon Heishman <vernon.heishman@vdot.virginia.gov>

Neil,

I have attached the LACC documents for the above-mentioned project for your review and comments for the **September 15, 2021 CTB Meeting**. If you have no comments, please send an email to Lori recommending your approval of the LACCs. Please reply by the COB **July 30, 2021**.

If you have any questions or concerns, please contact me.

Thank you,

George T. Rogerson, Jr.

*Policies & Procedures Section Manager
Location & Design Division / Central Office*
Virginia Department of Transportation
804-350-1571 (cell)
george.rogerson@vdot.virginia.gov



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

Stephen C. Brich, P.E.
Commissioner

1401 East Broad Street
Richmond, Virginia 23219

(804) 786-2701
Fax: (804) 786-2940

September 1, 2021

The Honorable Shannon Valentine
The Honorable Stephen C. Brich, P. E.
The Honorable Jennifer Mitchell
The Honorable Jerry L. Stinson
The Honorable Mary Hughes Hynes
The Honorable Alison DeTuncq
The Honorable Bert Dodson, Jr.
The Honorable W. Sheppard Miller III
The Honorable Carlos M. Brown
The Honorable Cedric Bernard Rucker
The Honorable Stephen A. Johnsen
The Honorable Mark H. Merrill
The Honorable E. Scott Kasprovicz
The Honorable Raymond D. Smoot, Jr.
The Honorable Marty Williams
The Honorable John Malbon
The Honorable Greg Yates

Subject: Approval of Limited Access Control Changes (LACCs) for I-77 Exit 41 Interchange Improvements in Wythe County.

Dear Commonwealth Transportation Board Members:

The Department has initiated the above request for LACCs for your consideration. The proposed LACCs on State Highway Project 0081-139-256, P101, R201, C501 have been determined as a necessary design feature and recommended for approval by the Department's staff.

I have reviewed the staff's recommendations and determined that approving these LACC's will not adversely affect the safety or operation of the affected highway network. I have determined that this request should be considered by the Board.

Sincerely,

Barton A. Thrasher, P.E.
Chief Engineer

Resolution



Resolution of Endorsement for the I-81 Southbound, Exit 72 and the I-77 Northbound, Exit 41 Interchange Modifications, also known as VDOT Project Number 0081-139-256, C501 P101, R201 and as VDOT UPC 116164

WHEREAS, a comprehensive, cooperative and continuing transportation planning process is to be carried out with the State of Virginia and the Town of Wytheville working together to facilitate this process year-round; and,

WHEREAS, the Town Council of the Town of Wytheville, Virginia, recognizes the importance of prioritizing transportation projects for funding by the Commonwealth Transportation Board based on an objective and fair analysis applied statewide, and prioritization is for the benefit of the town citizens; and,

WHEREAS, the Town Council acknowledges that the Town has identified the I-77, Exit 41 Ramp Modifications in the Town of Wytheville Comprehensive Plan as a high priority project to improve transportation safety and encourage development of the Progress Park Industrial Area; and,

WHEREAS, the Town Council recognizes that the realignment of the I-77 northbound ramp with Nye Road will improve truck traffic safety and create a more clear and welcoming arrival for visitors stopping in the Town of Wytheville; and,

WHEREAS, the Town Council acknowledges that the reconfiguration of the interchange supports the economic vibrancy of the Town of Wytheville and Wythe County.

NOW, THEREFORE, BE IT RESOLVED, that the Town Council of the Town of Wytheville, Virginia, approves and supports the limited access changes and ramp realignment as currently presented in the VDOT Project Number 0081-139-256, C501 P101, R201, also known as VDOT UPC-116164.

BE IT FURTHER RESOLVED, that the Town Council of the Town of Wytheville, Virginia, encourages and implores its Commonwealth Transportation Board and the Virginia Department of Transportation to complete design approval and implement the aforementioned project, and approves forwarding a copy of this resolution to the VDOT Wytheville Residency Office and the VDOT Bristol District Office.

Adopted this 28th day of June, 2021.


Beth A. Taylor, Mayor

ATTEST:


Sharon G. Corvin, CMC, Town Clerk

I-77 Exit 41 Interchange Improvements

Location and Design Public Hearing - July 15, 2021



Project Location

North Annee & South Tyler County

Legend

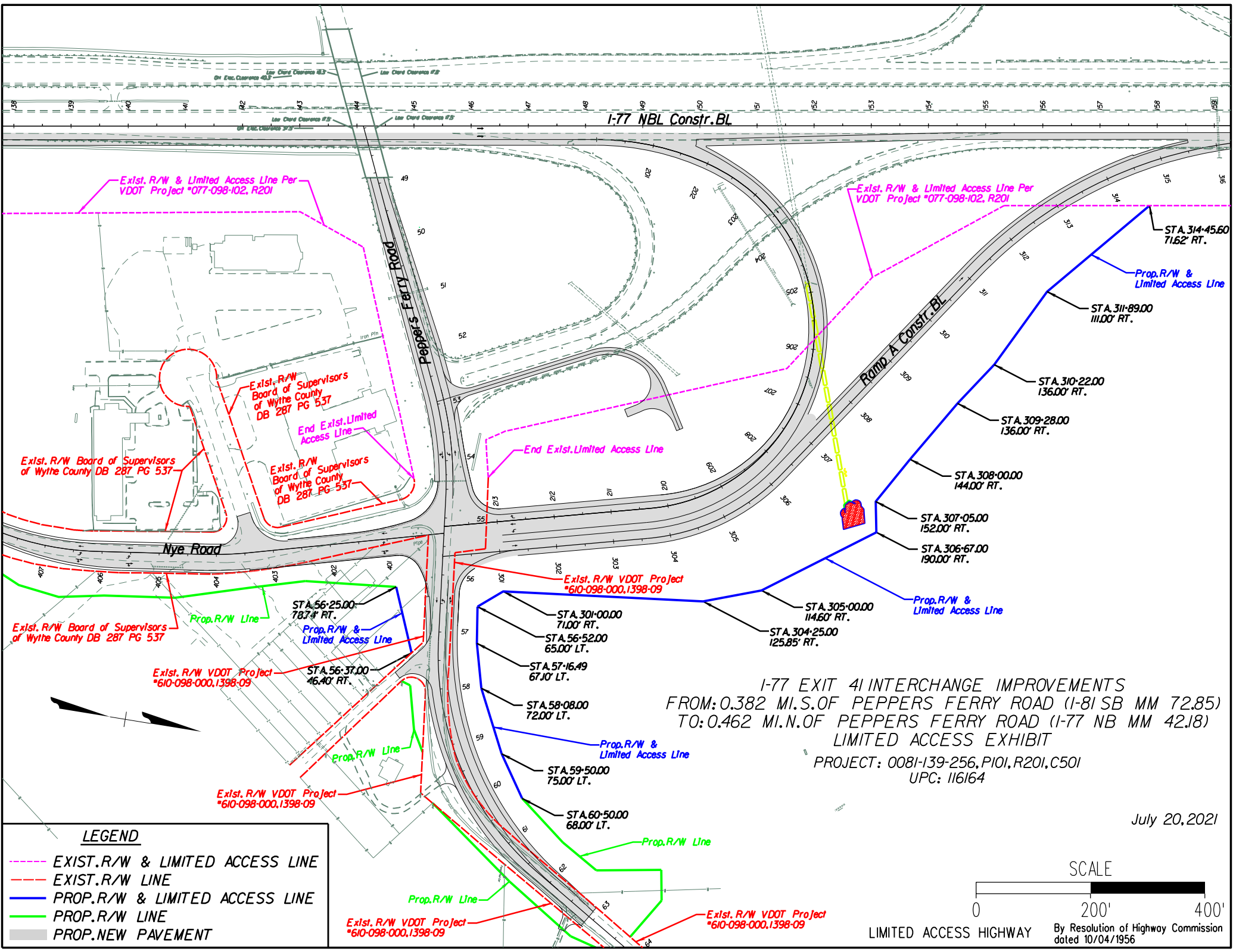
- Proposed Road
- Shoulder Management Lane
- Signal
- Center Right of Way
- Proposed Right of Way Line
- Proposed Interchange
- Proposed Lane
- Construction Easement
- Construction Right of Way
- Proposed Utility of Distribution

Contact Information

Virginia Department of Transportation
 3000 Northampton Road
 Bristol, Virginia 22101
 Contact: 800-368-7689 or vdot.virginia.gov

I-77 EXIT 41 INTERCHANGE IMPROVEMENTS
FROM: 0.382 MI. S. OF PEPPERS FERRY ROAD (I-81 SB MM 72.85)
TO: 0.462 MI. N OF PEPPERS FERRY ROAD (I-77 NB MM 42.18)
LIMITED ACCESS CONTROL POINTS
PROJECT: 0081-139-256, P101, R201, C501
UPC: 116164

BASELINE	STATION	OFFSET (FT.)	LEFT/RIGHT
Peppers Ferry Road	56+25.00	78.74	Right
Peppers Ferry Road	56+37.00	46.40	Right
Peppers Ferry Road	56+52.00	65.00	Left
Peppers Ferry Road	57+16.49	67.10	Left
Peppers Ferry Road	58+08.00	72.00	Left
Peppers Ferry Road	59+50.00	75.00	Left
Peppers Ferry Road	60+50.00	68.00	Left
Ramp A (NB Entrance)	301+00.00	71.00	Right
Ramp A (NB Entrance)	304+25.00	125.85	Right
Ramp A (NB Entrance)	305+00.00	114.60	Right
Ramp A (NB Entrance)	306+67.00	190.00	Right
Ramp A (NB Entrance)	307+05.00	152.00	Right
Ramp A (NB Entrance)	308+00.00	144.00	Right
Ramp A (NB Entrance)	309+28.00	136.00	Right
Ramp A (NB Entrance)	310+22.00	136.00	Right
Ramp A (NB Entrance)	311+89.00	111.00	Right
Ramp A (NB Entrance)	314+45.60	71.62	Right



I-77 NBL Constr. BL

Ramp A Constr. BL

Peppers Ferry Road

Nye Road

Exist. R/W & Limited Access Line Per VDOT Project *077-098-102, R201

Exist. R/W & Limited Access Line Per VDOT Project *077-098-102, R201

Exist. R/W Board of Supervisors of Wythe County DB 287 PG 537

End Exist. Limited Access Line

Exist. R/W Board of Supervisors of Wythe County DB 287 PG 537

Exist. R/W Board of Supervisors of Wythe County DB 287 PG 537

Exist. R/W Board of Supervisors of Wythe County DB 287 PG 537

Exist. R/W VDOT Project *610-098-000,1398-09

Exist. R/W VDOT Project *610-098-000,1398-09

Exist. R/W VDOT Project *610-098-000,1398-09

Exist. R/W VDOT Project *610-098-000,1398-09

Exist. R/W VDOT Project *610-098-000,1398-09

STA. 314-45.60
71.62' RT.

Prop. R/W & Limited Access Line

STA. 311-89.00
111.00' RT.

STA. 310-22.00
136.00' RT.

STA. 309-28.00
136.00' RT.

STA. 308-00.00
144.00' RT.

STA. 307-05.00
152.00' RT.

STA. 306-67.00
190.00' RT.

Prop. R/W & Limited Access Line

STA. 305-00.00
114.60' RT.

STA. 304-25.00
125.85' RT.

STA. 301-00.00
71.00' RT.

STA. 56-52.00
65.00' LT.

STA. 57-16.49
67.10' LT.

STA. 58-08.00
72.00' LT.

Prop. R/W & Limited Access Line

STA. 59-50.00
75.00' LT.

STA. 60-50.00
68.00' LT.

I-77 EXIT 41 INTERCHANGE IMPROVEMENTS
FROM: 0.382 MI. S. OF PEPPERS FERRY ROAD (I-81 SB MM 72.85)
TO: 0.462 MI. N. OF PEPPERS FERRY ROAD (I-77 NB MM 42.18)
LIMITED ACCESS EXHIBIT

PROJECT: 0081-139-256, P101, R201, C501
UPC: 116164

July 20, 2021

LEGEND

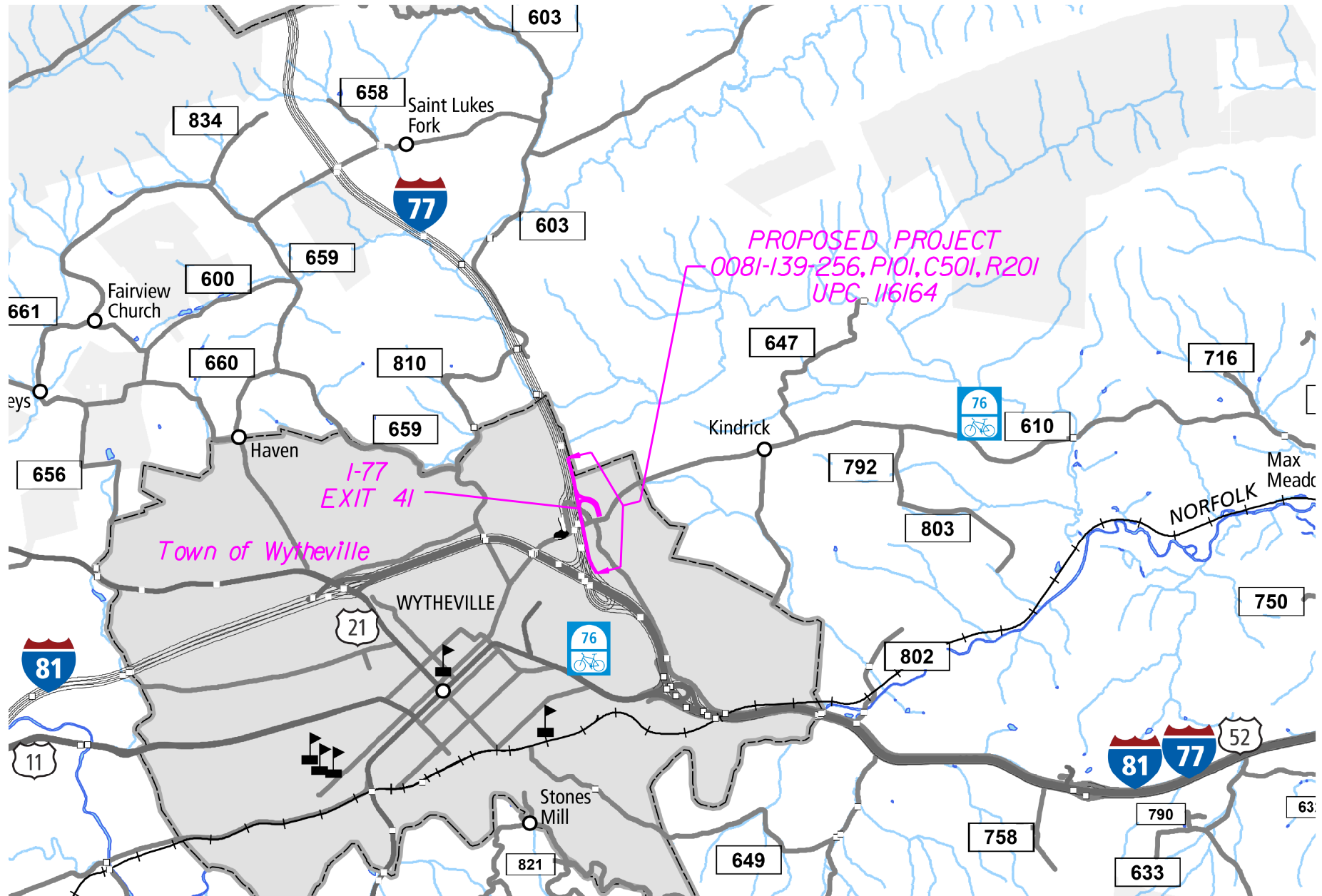
- EXIST. R/W & LIMITED ACCESS LINE
- EXIST. R/W LINE
- PROP. R/W & LIMITED ACCESS LINE
- PROP. R/W LINE
- PROP. NEW PAVEMENT

SCALE



LIMITED ACCESS HIGHWAY By Resolution of Highway Commission dated 10/04/1956

INTERSTATE I-77 LOCATION MAP



WYTHE COUNTY

