



**NASSAU COUNTY**  
**BOARD OF COUNTY COMMISSIONERS**  
96135 Nassau Place, Suite 1  
Yulee, Florida 32097

John F. Martin  
A.M. "Hupp" Huppmann  
Jeff Gray  
Alyson R. McCullough  
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Dist. No. 5 Callahan/West Yulee

TACO E. POPE, AICP  
County Manager

Mitch L. Keiter  
Clerk of the Circuit Court & Comptroller

DENISE C. MAY  
County Attorney

### MEMORANDUM

**TO:** Honorable A.M. "Hupp" Huppmann, Chairman Nassau County, FL BOCC  
**FROM:** Taco E. Pope, AICP, County Manager  
**CC:** Board of County Commissioners, Nassau County, Florida  
Marshall Eyerman, Asst. County Manager  
Denise C. May, County Attorney  
Heather Encinosa, Nabors, Giblin, Nickerson, PA  
Robert Companion, Deputy County Manager/County Engineer  
**DATE:** October 30, 2025  
**RE:** Extraordinary Circumstance Demonstrated Need Study – Mobility Planning

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As per the 2025 Florida Statute §163.31801, Impact fees; short title; intent; minimum requirements; audits; challenges, section (6) states, in part:

*A local government, school district, or special district may increase an impact fee only as provided in this subsection.*

*(a) An impact fee may be increased only pursuant to a plan for the imposition, collection, and use of the increased impact fees which complies with this section.*

*(b) An increase to a current impact fee rate of not more than 25 percent of the current rate must be implemented in two equal annual increments beginning with the date on which the increased fee is adopted.*

*(c) An increase to a current impact fee rate which exceeds 25 percent but is not more than 50 percent of the current rate must be implemented in four equal installments beginning with the date the increased fee is adopted.*

*(d) An impact fee increase may not exceed 50 percent of the current impact fee rate.*

- (e) An impact fee may not be increased more than once every 4 years.*
- (f) An impact fee may not be increased retroactively for a previous or current fiscal or calendar year.*
- (g) A local government, school district, or special district may increase an impact fee rate beyond the phase-in limitations established under paragraph (b), paragraph (c), paragraph (d), or paragraph (e) by establishing the need for such increase in full compliance with the requirements of subsection (4), provided the following criteria are met:*
- 1. A demonstrated-need study justifying any increase in excess of those authorized in paragraph (b), paragraph (c), paragraph (d), or paragraph (e) has been completed within the 12 months before the adoption of the impact fee increase and expressly demonstrates the extraordinary circumstances necessitating the need to exceed the phase-in limitations.*
  - 2. The local government jurisdiction has held at least two publicly noticed workshops dedicated to the extraordinary circumstances necessitating the need to exceed the phase-in limitations set forth in paragraph (b), paragraph (c), paragraph (d), or paragraph (e).*
  - 3. The impact fee increase ordinance is approved by a unanimous vote of the governing body.*

#### **Nassau County, Florida Transportation and Mobility Network Planning:**

On August 25, 2014, the Nassau County Mobility Fee Ordinance was adopted by the Board of County Commissioners to provide additional funding to implement capacity adding improvements to the County Transportation System. These capacity adding improvements are proposed to accommodate the traffic generated by growth and maintain the standards of service adopted in the Nassau County Comprehensive Plan. Nassau County utilizes a Mobility Plan and cost per vehicle mile travelled (VMT) method for determining the dollar amount of the fees to be assessed. As required in Section 3.06 of the Mobility Fee Ordinance, the Mobility Plan must be reviewed and updated every five (5) years. The last update for Zones 1, 2, & 3 were adopted October 25, 2021.

On June 3, 2024, County Staff began working with Peters and Yaffee to develop the scope for the next update of the Mobility Plan and work initially began on the update itself on November 22, 2024. However, due to a new version of the Northeast Florida Regional Planning Model – Four Step Model (NERPM 2020) being released on February 5, 2025 (V1.00), the update to the Mobility Plan restarted in February 2025. A draft of the 2025 Mobility Plan Update was submitted on April 14, 2025, and a second draft was submitted on September 27, 2025, after the study was updated to use the 12th ITE Trip Generation



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Manual that was released on August 18, 2025. The final study has been completed at the time of this memo.

Coordination with ETM, the engineering team representing the East Nassau County Planning Area (ENCPA) which is the same area as all of Mobility Zone 2, began in November of 2024. The release of the 12<sup>th</sup> ITE Trip Generation Manual on August 18, 2025, created a need to recalculate the Zone 2 projects. The draft study for Zone 2 was provided on October 16, 2025. The final study has been completed at the time of this memo.

The goals of the 2025 Mobility Plan Update were to analyze the existing County Transportation System, compare the system against the latest growth projections contained in the Northeast Florida Regional Planning Model – Four Step Model (NERPM 2020) model, propose projects to mitigate impacts the County Transportation System as a result of the models projected growth, provide cost estimates to construct the proposed projects, use the cost estimate information to determine the cost per vehicle mile traveled (VMT), and finally, calculate specific fees for a variety of potential uses based on the cost per VMT.

On November 14<sup>th</sup>, 2019, the NFTPO adopted the 2045 LRTP for the NE Region. Nassau County was an active participant during the process serving in a leadership role on the NFTPO's Technical Advisory Committee and providing critical data to ensure a comprehensive mobility strategy was adopted in Nassau County. The NFTPO LRTP was one of the foundational elements of the County's Comprehensive Plan/FTMS update.

On November 9, 2020, Nassau County adopted updates to its 2030 Comprehensive Plan and Future Transportation Map Series. Said updates to the 2030 Comprehensive Plan became effective on December 20, 2020. These amendments were executed in accordance with local and state law.

On June 21, 2021, the Board of County Commissioners held a public workshop to discuss the County's first comprehensive five-year Capital Improvement Plan (5-yr CIP). The 5-yr CIP includes both funded projects, those which funding has been identified in the first five years, and Candidate Projects, those projects which have been deemed necessary or desired but not included for funding in the first five years of the 5-yr CIP. On June 28, 2021, the Board of County Commissioners approved the 5-yr CIP subject to final budget allocation. The 5-yr CIP

is inclusive of all the projects in the Nassau County Mobility Plan as either Funded or Candidate Projects. The 5-yr CIP is reviewed and updated on an annual basis.

These foundational documents were updated as part of the County's comprehensive, strategic and thorough review and update of its County-wide Mobility Plan. The Mobility Plan update includes the required five (5) year coordinated review of the East Nassau Community Planning Area Sector Plan Mobility Plan (Mobility Zone 2 of the Comprehensive County-wide Mobility Plan) and a complete restructuring of the remaining portions of the County-wide Mobility Plan (Mobility Zones 1 and 3). The adoption and execution of the Mobility Plan update and adoption of the correlating increased fee is a critical component of implementing the NFPTO's LRTP, Nassau County's Comprehensive Plan/FTMS, and 5-yr CIP.

Additionally, it was necessary to coordinate the East and West Mobility Fee updates with the 5-Year Coordinated Review for the ENCPA Mobility Plan and Fee updates (Zone 2) to ensure the County Mobility Plan (Zones 1 and 3) and the ENCPA Mobility Plan were in harmony. The coordinated review was completed as part of the 2025 Mobility Plan update.

#### **Required Workshops:**

The Nassau County Board of County Commissioners has set public workshops pursuant to the requirements of §163.31801 (6). The public workshops will be held on November 10, 2025, and on December 8, 2025. The intent of the workshops is to meet the Statutory requirement that, "the local government jurisdiction has held at least two publicly noticed workshops dedicated to the extraordinary circumstances necessitating the need to exceed the phase-in limitations set forth in paragraph (b), paragraph (c), paragraph (d), or paragraph (e)".

#### **Extraordinary Diligence, Transparency and Technical Execution:**

In the spirit of promoting a collaborative approach to governance, County staff created a Mobility Plan and related 5-yr CIP that are robust outward facing documents that are user friendly, easy to comprehend, and readily accessible. In order to package the material in a manner that was easily digestible for the general public, advocacy groups, and development community, it took an extraordinary effort by staff to create this unparalleled transparency, accessibility and equity for users. The referenced documents can be viewed here:

- Nassau County Mobility Plan Review and Update (Nassau County Mobility Zone 1 & 3) Ordinance 2021-24, Adopted Oct. 25, 2021
- ENCPA Mobility Plan 5-yr Coordinated Review and Update (Nassau County Mobility Zone 2) Ordinance 2021-17, Adopted Oct. 25, 2021
- Five-year Capital Improvement Plan 2025/2026 – 2029/2030



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<https://www.nassaucountyfl.com/DocumentCenter/View/30682/CIP-Guidebook---Fiscal-Year-2025-2030-Update---09252025-1330>

- Future Transportation Map Series and Transportation Element

<https://www.nassaucountyfl.com/769/2030-Comprehensive-Plan-FLUM>

### **Extraordinary Population Expansion/Urbanization:**

Since the adoption of the previous Mobility Plan and Mobility Fee Study in 2021, Nassau has experienced extraordinary change. Rapid population expansion and urbanization have altered not only the physical and natural environment but also the social and cultural dynamics of the community. These changes have reshaped the manner in which we interact with our environment and the individuals/entities that comprise our community.

According to the latest population estimates from the Bureau of Economic Business and Research (BEBR), Nassau County's population increased from approximately 93,012 residents in April 2021 to 107,053 residents in April 2025, representing a 15.10% increase. From 2024, BEBR projects continued growth to 129,200 residents by 2030 (+20.7%) and 188,900 residents by 2050 (+76.5%). This growth rate ranks Nassau as the 8th fastest growing County in the State. For a national perspective, out of 3,144 counties in the United States, Nassau ranked as the 53rd fastest-growing county by percent growth from 2020-2024. This growth rate places Nassau in the top 1.7% of all counties in the Country.

Rapid population expansion does not just bring more people to the County, it brings new people, with new ideas, experiences, expectations and demands. In addition, rapid population expansion spurs new development in the form of retail and job centers, roads, schools, parks and other improvements to support the increased population base. This diversification of the population coupled with rapid urbanization and resulting influx of new non-residential entities entering the County has expanded the expectations and demands on local services, infrastructure, and governmental operations. Traffic volumes have also

increased substantially. For example, on one of the County's critical corridors, SR A1A/SR 200, annual average daily traffic (AADT) increased by approximately 10,000 east of I-95 and by approximately 7,000 west of I-95 between 2021 and 2024.

Capital planning and maintenance is not immune to these striking demands. Not only is there an increased demand on the quantity of services provided, the complexity and level of sophistication necessary to be effective has increased exponentially. This trend will continue for the foreseeable future. As such, we must evolve our capacities and approach to execute our public duties in an efficient and effective manner.

#### **Fee Levels and Extraordinary Cost of Construction Increase:**

Despite being one of the fastest growing Counties in the State and US over the past four (4) years, Nassau County has held the Mobility Fee for Zones 1 and 3 flat since 2021 while facing expanding demand on the Mobility Network.

Since the 2021 Mobility Plan Update, construction and right-of-way costs have increased significantly due to inflation, COVID, supply chain challenges, and rising labor and material costs.

- **Construction Cost Inflation:** The National Highway Construction Cost Index (NHCCI) increased from 1.911 in 2021 Q1 to 3.167 in 2025 Q1, representing a 66% rise in overall highway construction costs. Notably, the total increase between 2014 Q3 and 2025 Q1 was 83%, with the most dramatic escalation occurring after 2021.
  - If only a 50% impact fee rate increase were applied, the total available budget for Zone 1 and Zone 3 would be approximately \$129.93 million, while the updated Mobility Plan funded project total is \$251.23 million, resulting in a \$121.30 million shortfall. This would leave critical capacity-adding projects unfunded for design and construction.
  - A comparison of the projects included in both the 2021 Mobility Plan and 2025 Mobility Plan Update shows an aggregate cost difference of \$70.1 million solely due to inflation. This is an increase of 63.27%.
- **Material Cost Escalation:** Since 2020, construction materials have continued to rise at an accelerated pace. The Producer Price Index (PPI) for construction materials increased from 233 to 338, reflecting a 45% escalation in just five years.
- **Right-of-Way Costs:** Average right-of-way acquisition costs increased from \$15,000 per acre in 2021 to \$100,000 per acre in 2025, representing a 567% increase.
- **Supply Chain and Delivery Delays:** Project delivery timelines have lengthened due to supply chain delays and contractor capacity constraints, further increasing overall project budgets.

The updated unit cost estimates incorporated in the 2025 Mobility Plan Update reflect current market conditions necessary to deliver the same level of infrastructure that was envisioned in prior plans. This construction cost increase coupled with the population growth have rendered the historic transportation funding sources augmented by the currently adopted Mobility Fees inadequate to address Mobility Network capacity needs necessary to maintain high quality of life, be regionally and globally competitive, promote



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creation of high-wage jobs, support the robust tourism industry, and protect the general health, safety and welfare of the citizens of Nassau County and our visitors.

**Findings of Fact:**

The body of this memorandum satisfies the statutory requirements to demonstrate extraordinary circumstances necessitating the need to exceed the 50% phase-in limitations set forth in §163.31801 (6), Florida Statutes. Adopting the proposed 2025 Mobility Plan Update and implementing the related Mobility Fee supports the expansion of the Nassau County Mobility Network's capacity allowing for strategic investment that protects quality of life/quality of place, promotes economic expansion, creates of high-wage jobs, manages growth in a fiscally and sustainable manner, protects the public health, safety, and general welfare, and allows Florida to remain globally competitive.

In sum, the following extraordinary circumstances necessitate and justify the need for Nassau County to increase its Mobility Fees in excess of the statutory phase-in limitations in §163.31801 (6), Florida Statutes:

- (1) Nassau County's extraordinary growth rate requires the implementation of new transportation capacity to meet the demands of new growth. To ignore this immediate demand would negatively impact on the County's ability to financially plan and implement the required transportation system upgrades, negatively impact on the desirability of the County for new development and job creation, and cause a deterioration in the level of service for existing residents and businesses.
- (2) The costs of transportation infrastructure continue to increase at an extraordinary rate in the County and any further delays in implementation of an updated Mobility Fee risks the County being able to afford the cost of the needed transportation infrastructure upgrades that are required to serve new growth.