



Nassau County
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TO: Taco Pope, AICP - County Manager
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Constance Lake, CFM - Deputy Floodplain Administrator
Sara Clifton - CRS Coordinator

DATE: January 30, 2026

SUBJECT: Unincorporated Nassau County LMS Annex to the *Nassau County, FL Multi-Jurisdictional Natural Hazard Mitigation Strategy, 2026-2031*

The Nassau County Building Department administers the County’s participation in both the Federal Emergency Management Agency (FEMA) National Flood Insurance Program (NFIP) and Community Rating System (CRS). NFIP participation allows community property owners, businesses, and residents to purchase the federally backed flood insurance for adopting and enforcing minimum NFIP regulations. CRS then provides a community-wide premium discount on most NFIP policies through FEMA-recognized flood mitigation higher standard activities.

As a member in good standing with both NFIP and CRS, Floodplain Management and Stormwater Management staff recommend this annex (NCHMT LMS Annex) be incorporated into, and adopted with, the *Nassau County, FL Multi-Jurisdictional Natural Hazard Mitigation Strategy, 2026-2031* (2026 LMS) on behalf of unincorporated Nassau County to provide/expand on its hazard mitigation planning conducted in conjunction with the 2026 LMS planning process.

I. AUTHORITY

- A. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (PL 100-707), as amended by the Disaster Mitigation Act of 2000 (PL 106-390).
- B. See Executive Summary and Planning Process of the 2026 LMS for general authorities.

- C. Applicable county ordinances, county/regional plans pertaining to mitigation, floodplain management, zoning regulations, land management, and/or construction standards, etc.
- D. Applicable County appointments of the Flood Hazard Mitigation Team (NCHMT) members.

II. PURPOSE

- A. This annex recognizes mitigation as a long-term, on-going process, and identifies planning and implementation actions applicable to both pre-incident and post-incident situations as well as repetitive flood loss and vulnerability focus areas.
- B. This annex describes the organization of the local NCHMT, identifies coordination for hazard mitigation planning, and expands on risk assessment and impacts of the flood-related hazard assessment of the 2026 LMS.
- C. This annex explains repetitive loss analysis and methodologies used to determine Nassau County Repetitive Loss Areas (RLAs) required of the County's current CRS RL Category B classification.
- D. This annex is applicable to and supports mitigation planning, continued assessment, and implementation activities to the area of responsibility covered by unincorporated Nassau County.

III. EXPLANATION OF TERMS

A. Acronyms

• CRS	Community Rating System
• FDEM	Florida Department of Emergency Management
• FPM	Nassau County Building Department-Floodplain Management
• GIS	Geographic Information System
• NCEM	Nassau County Emergency Management
• NCHMT	Nassau County Hazard Mitigation Team
• NCPA	Nassau County Property Appraiser
• NFIP	National Flood Hazard Insurance Program
• PDA	Preliminary Damage Assessment
• RL	Repetitive Loss
• RLA	Repetitive Loss Area
• SRLF	Severe Repetitive Loss
• SWDM	Nassau County Stormwater & Drainage Management
• SD	Substantial Damage
• SDD	Substantial Damage Determination

B. Definitions

Preliminary Damage Assessment – a mechanism used to determine the impact and magnitude of damage and the resulting unmet needs of individuals, businesses, the public sector, and communities as a whole.

Repetitive Loss – an NFIP-insured structure that has had at least two (2) paid flood losses of more than \$1,000 each in any 1-year period since 1978.

Repetitive Loss Area – community-determined areas of repetitive flooding through analysis of NFIP repetitive loss list and incorporating nearby properties with the same, similar, or potential flooding conditions as required by CRS participation.

Severe Repetitive Loss – an NFIP-insured structure that has had four (4) or more losses exceeding \$5,000, with the cumulative amount of paid claims exceeding \$20,000; or, at least two (2) separate claims with the cumulative amount exceeding the fair market value of the structure before the loss.

Substantial Damage - damage of any origin sustained by a structure whereby the cost of restoring the structure to its before damaged condition would equal or exceed fifty (50) percent of the market value of the structure before damage occurred.

Substantial Damage Determination – determination and documentation of substantial damage by the Nassau County Building Official/Floodplain Administrator, per BOCC Code 10½-39.

IV. SITUATION & 2026 LMS ASSOCIATION

A. Situation

1. The 2026 LMS indicates we are vulnerable and at risk from flood-related hazards that have caused, or have the potential for causing, loss of lives, personal injuries, and/or extensive property damage. We have suffered incidents, emergencies, and disasters in the past and are still vulnerable and at risk from future similar occurrences.
2. Through the LMS Task Force and by the Planning Process identified in the 2026 LMS, the NCHMT members participated in all applicable steps for the development of the final plan and this annex.
3. In addition to hazard mitigation planning and grant funding eligibility, the Nassau County LMS has also served as its CRS Floodplain Management Plan (FMP) and contributed to CRS Flood Warning and Response (610) credit criteria since the County joined CRS in 2016. CRS/ISO-FEMA review of the 2026 LMS identifies additional FMP criteria needed to meet CRS program requirements. FDEM-FEMA approval of the 2026 LMS is complete; therefore, the NCHMT LMS Annex provides additional CRS criteria are incorporated herein.

B. 2026 LMS Association

1. Hazard mitigation planning is conducted in accordance with the FEMA 10-step planning process; refer to the 2026 LMS for applicable steps and activities not contained in this annex.
2. RLA development was conducted per CRS Category B community minimum requirements. To advance its RLA analysis/mitigation strategies, or in the event the County is classified as a CRS Category C community (50, or more, RL properties), it will complete the 5-step identified CRS RLAA planning process and incorporate through 2026 LMS/NCHMT Annex maintenance and update process.
3. Update and maintenance of this annex is the responsibility of NCHMT in collaboration with NCEM and other applicable regional, state, or federal stakeholders.

V. NASSAU COUNTY HAZARD MITIGATION TEAM & STAKEHOLDERS

A. NCHMT includes representatives from all County departments participating in, or related to, hazard mitigation planning and implementation activities. Current members include:

1. County Attorney's Office
 - *Denise May, County Attorney*
2. County Manager's Office
 - *Taco Pope, County Manager*
 - ***Marshall Eyerman, Assistant County Manager****
 - *Robert Companion, Deputy County Manager / County Engineer*
3. Fire Department
 - *Brady Rigdon, Fire Chief*
4. Planning Department
 - *Elizabeth Backe, Director*
 - *Mikheal Eyerman, Planning Technician*
5. Building Department
 - *Charles Barr, Building Official / Floodplain Administrator***
 - *Constance Lake, Deputy Floodplain Administrator***
 - *Robert Hunt, Inspection Supervisor*
 - *Sara Clifton, CRS Coordinator***
6. Stormwater & Drainage Management Department
 - ***Katie Peay, Director****

7. Public Works Department
 - *Doug Podiak, Director*
 - *David Hearn, Deputy Director*
 - *Darren Marsh, Assistant Road Director*
 - *Jay Robertson, Parks & Recreation Director*
 - *Jeff Little, Facilities Maintenance Division Manager*
8. Capital Projects Management Department Representatives
 - *Ray Albury, Director*
9. Strategic Advancement & Economic Resources Representatives
 - *Brandy Carvalho, Director*
 - *Taylor Clem, Conservation Land Manager*
10. Development Services Department Representatives
 - *Caleb Hurst, Director*

*current LMS Task Force Member/NCEM liaison

**current NFIP/CRS state and federal liaison

B. In addition to collaboration with stakeholders identified in the 2026 LMS, NCHMT members worked directly with other agencies for contribution to its 2026 LMS and annex. Information through meetings, email communication, and/or phone calls was obtained from:

1. Nassau County Property Appraiser's Office / Geographic Information Systems (GIS)
 - *Jason Gregory, Director*
 - *Will Fontanez, GIS Specialist*
2. Florida Governmental Utility Authority (FGUA) / Nassau-Amelia Utilities (NAU)
 - *Paul Arnett, Development Services Manager*
3. Nassau Soil and Water Conservation District
 - *Cari Cahill, District Coordinator*
4. The Balmoral Group (NC Vulnerability Assessment Contractor)
 - *Daniel Dourte, Director Earth Science and Data*
5. Halff (NC Adaptation Plan Contractor)
 - *Patrick Doty, Senior Resilience Planner*

VI. REPETITIVE LOSS AREA RISK ASSESSMENT ANALYSIS

A. Repetitive Loss List – FEMA requires an Information Sharing Access Agreement (ISAA) with communities to disseminate NFIP claim data due to privacy protection restrictions. FPM staff updated the expiring Nassau County ISAA with FEMA Region IV in 2024. The fully executed ISAA and current RL data was provided to Nassau County on 12/29/2024. In addition to historic RL data, claim information included data from the 2024 hurricane season which involved three named storms and a

severe rainfall event. All identified RL properties and associated claims were reviewed by FPM staff, and five RL properties were found to be outside the County's jurisdiction or had been mitigated since the most recent date of loss. Transmittals and supporting documentation were submitted to FEMA, along with the CC-RL certification, by the County's CRS Coordinator (RL Representative) and only one is awaiting further documentation/completion.

B. Repetitive Loss Category – the updated list confirmed Nassau County's CRS Category B classification (1-49 RL properties), with 29-RL and 3-SRL properties for a total of 32 properties.

C. Repetitive Loss Areas – each RL and SRL property was then reviewed to identify its flooding source, building characteristics, topography, and all related claim data. Associated surrounding properties were then evaluated and those with similar characteristics were selected for the RLA. This resulted in a total of 458 RLA properties within 20 individual RLAs.

1. RLA Methodology:

- Flooding source – determined by using previous RL analysis results, published storm records, SWDM inspection data, and Nassau County historic flooding information to identify similar flooding sources/conditions.
- Building characteristics – determined by using NCPA records, building permit records, FPM records for PDA/SDD assessment, as well as all claim data identifying properties with singular claims (non-RL/SRL).
- Topography/flood depth – determined by using NCPA GIS, Google Earth, Nassau County Vulnerability Assessment dashboard, and other online flood risk assessments tools for areas equal to, or lower than, grade adjacent to RL buildings.

2. RLA Mapping – Individual RL is privacy protected; therefore, once incorporated into an RLA (and not identifiable), mapping was then created in collaboration with NCPA GIS to demonstrate county-wide RLAs. Additionally, each RLA was individually mapped identifying flooding source for each as well as the number of properties.

D. Repetitive Loss Outreach Project – to assist with outreach on repetitive flooding within the community and as a requirement of CRS participation, FPM conducts an annual outreach project to provide all RLA residents helpful information to be aware of the risk as well as protection and potential mitigation measures that can be taken. NCPA GIS generates RLA properties mailing list used to distribute a letter and associated brochure to all RLA properties with insurable buildings. The 2025 RLA outreach was completed prior to completion of the updated claims analysis, so the 2026 mailing will incorporate the updated analysis and new RLA properties/areas.

- E. All Loss Analysis – all properties identified in NFIP claim information were evaluated under the RLA methodology. Although many were attributed to RLA(s), several were found to be attributed to local drainage concerns. FPM is currently in development of the Nassau County Residential Grant Mitigation Program to help facilitate flood mitigation funding within the community for non-acquisition mitigation projects. In addition, FPM provides support to other County and regional planning efforts (e.g. vulnerability assessment, vision-comprehensive-strategic planning, and resiliency/adaptation planning) to assist in incorporating strategies, risk-identification, and research for potential funding sources to further mitigation of all properties at a higher risk for, and/or experiencing, flood loss. Further review, updating, and analysis of FEMA non-compliance data is forthcoming and will be incorporated into the 2026 LMS/NCHMT Annex through the update and maintenance process.

VII. ADDITIONAL MITIGATION STRATEGIES

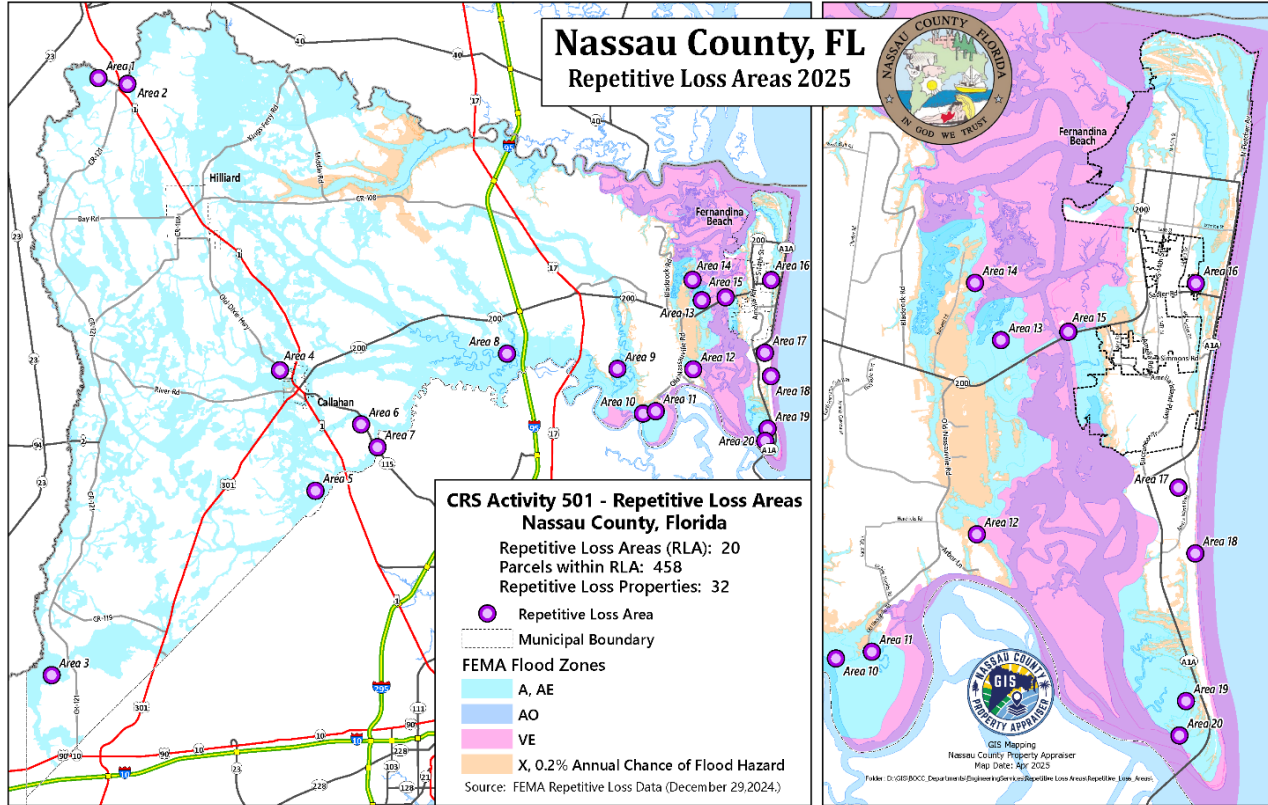
- A. Repetitive Loss Area Analysis (RLAA) – a RLAA is a detailed mitigation plan for a repetitive loss area. It is designed to follow FEMA’s CRS 5-step process to produce specific guidance on how to reduce damage from repetitive flooding. FPM is underway coordinating with SWDM to leverage existing Thomas Creek RLA study data to complete the 5-step process and develop the County’s initial RLAA. Once complete, the Thomas Creek RLAA will be presented to the NCHMT for consideration of incorporation herein. Once approved and reviewed by FEMA/CRS, the Thomas Creek RLAA will be used as a template for analysis of the County’s remaining individual RLAs.

VIII. ADOPTION, DEVELOPMENT & MAINTENANCE

- A. NCHMT LMS Annex will be presented for adoption to the BOCC in conjunction with and integration into the *Nassau County, FL Multi-Jurisdictional Natural Hazard Mitigation Strategy, 2026-2031*. Routine review and maintenance will occur in conjunction with the 2026 LMS and/or as projects, resources, and initiatives require.
- B. In coordination with NCEM and the 2026 LMS plan, NCHMT LMS Task Force and NFIP/CRS representatives (per Section V.) have overall responsibility for the adoption and further development/enhancement of the NCHMT LMS Annex, including coordination with NFIP/CRS state and federal authorities and other applicable NCHMT members.
- C. The NCHMT LMS Task Force and NFIP/CRS representatives (per Section V.) have overall responsibility for the maintenance of all components of the NCHMT LMS Annex, including associated records, reports, SOPS, and correspondence.

APPENDIX A – RLA RISK ASSESSMENT MAPPING

Overview:



Individual RLAs:

