



December 10, 2025

Via Email Delivery

The Honorable Lauren Melo
Florida House of Representatives
209 House Office Building
402 South Monroe Street
Tallahassee, FL 32399-1300

Re: **HB 299 Blue Ribbon Projects**
12/11/2025 agenda, House Intergovernmental Affairs Subcommittee

Dear Representative Melo:

On behalf of the Florida League of Cities and the municipalities we represent, I respectfully express our serious concerns with HB 299. The bill establishes a new state-level framework for “Blue Ribbon Projects” (BRPs) while significantly curtailing local planning authority and creating substantial concerns related to infrastructure capacity, fiscal exposure, public safety, and regional coordination.

Under the bill, BRPs must consist of at least 10,000 contiguous acres (roughly 15.6 square miles), meaning that only a small number of Florida cities are likely to have sufficient undeveloped land within their jurisdiction to host such a project. Even so, the developments authorized under this bill are, by definition, massive in scale, and even a limited number of BRPs can place extraordinary strain on nearby municipalities that must absorb the resulting population growth, traffic, utility demand, and emergency response needs.

State Mandated Development Without Local Planning Authority

HB 299 requires BRPs to receive administrative staff-level approval, eliminates the need for comprehensive plan amendments and rezonings, and limits local government review solely to whether the project meets statutory criteria created in HB 299. If those criteria are met, approval is mandatory, and failure to act within rigid statutory deadlines results in automatic approval by operation of law, all without any public hearing or vote of the local governing body.

This framework bypasses Florida’s long-standing comprehensive planning system and removes the ability of cities to determine whether development of this scale is appropriate given their infrastructure capacity, evacuation constraints, water supply, and long-term fiscal sustainability.

Unintended Fiscal and Infrastructure Consequences

The bill also vests development rights for decades without requiring enforceable emergency management or evacuation-capacity analysis prior to approval. Projects of this magnitude will directly impact hurricane evacuation times, shelter demand, and regional emergency response logistics, yet local governments lack meaningful authority to condition approval based on these life-safety constraints.



By eliminating legislative rezonings and comprehensive plan amendments, HB 299 removes essential public accountability from land-use decisions that will affect property values, infrastructure costs, and community character for generations. The bill also creates a special, accelerated entitlement process available only to exceptionally large landowners, establishing a two-tier development system that disadvantages small and mid-scale developers.

Large-scale development authorized under HB 299 may directly affect municipally owned utility systems financed through long-term bonded debt. Sudden, externally mandated capacity expansion can undermine rate covenants, force unplanned capital improvements, exceed existing system capacity, and jeopardize bond obligations, placing both municipal credit ratings and utility customers at risk.

Lack of Required Regional Coordination

HB 299 does not require meaningful intergovernmental coordination among affected local governments. Developments of this scale will place infrastructure and service demands on jurisdictions far beyond the approving local government, yet the bill limits review solely to statutory compliance and prohibits the planning tools that normally trigger coordinated regional evaluation.

BRPs will function as regional population centers, with workforce housing, traffic, utilities, and emergency services frequently extending well beyond municipal boundaries. HB 299 also fails to address how BRPs would be reviewed when the required 10,000 contiguous acres span multiple jurisdictions, creating significant legal uncertainty regarding approval authority, automatic-approval timelines, and allocation of infrastructure and service responsibilities. This omission invites litigation and intergovernmental conflict.

As a result, cities are left without a guaranteed seat at the table to plan for the regional transportation, utility, evacuation, and service impacts generated by these projects, undermining one of the core purposes of Florida's growth-management system: coordinated, data-driven regional planning.

State Assumption of Land-Use Adjudication

HB 299 transfers final authority over land-use disputes from locally elected officials and Florida's circuit courts to the Department of Commerce and the administrative hearing process. This represents a significant departure from long-standing home-rule and judicial-review frameworks, centralizing land-use adjudication at the state level for projects whose impacts are overwhelmingly local and regional.

Conclusion

HB 299 represents a fundamental restructuring of Florida's land-use and growth-management framework that shifts long-term infrastructure, fiscal, and public-safety risk onto local governments while stripping them of meaningful planning authority. The Florida League of Cities respectfully urges that HB 299 not advance without substantial amendments restoring local discretion, regional coordination, and fiscal safeguards.

Thank you for your time and consideration. Please feel free to contact me with any questions.

Sincerely,



David Cruz
Legislative Counsel
Florida League of Cities, Inc.

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