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Intermodal Logistics Center
WORKING GROUP

DRAFT REPORT

Advancing Florida's Freight Future



FDOT

OCTOBER 2026

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FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES EST. 1868

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EXECUTIVE SUMMARY

Florida stands out.

The Sunshine State owns the second longest coastline of all states. Beaches and seaports abound. Both visitors and a population expected to grow at an annual rate of 0.8% to 0.9%[1] demand a staggering amount of goods, and they'd like to receive them faster. At the same time, Florida is ranked sixth in exports by state but the annual export growth rate surpasses that of the top five exporting states.[2]

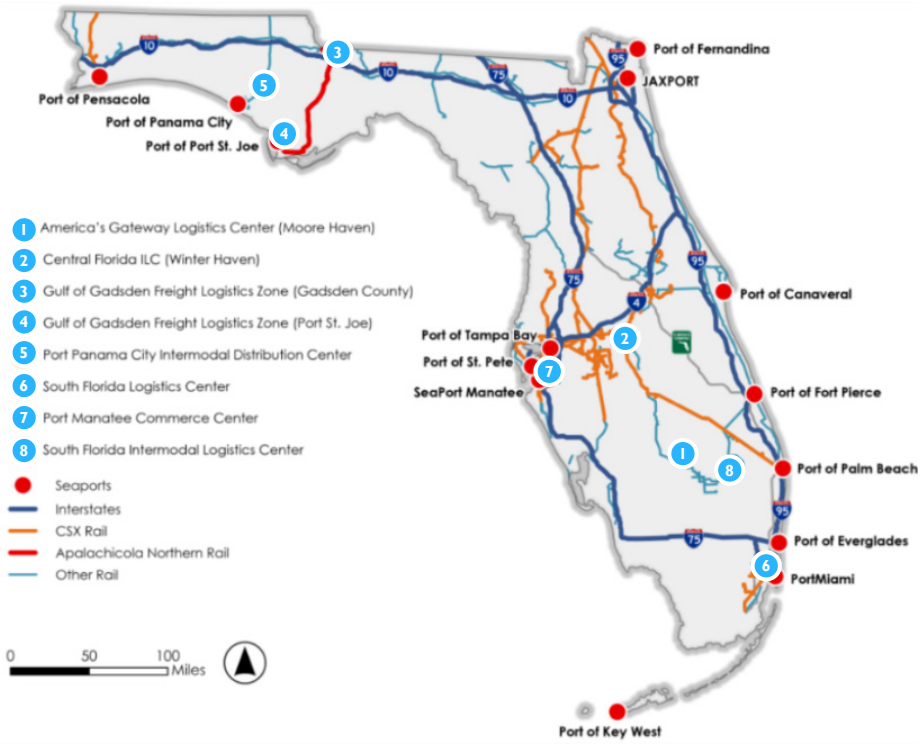
As a peninsula, Florida draws and delivers goods through multiple seaports along three coasts, facilitating freight for a large, consumption driven market in-state and beyond. As population and freight demand continue to grow, Florida needs a multi-point decentralized freight transportation system to maintain flow, support timely goods and freight movement and avoid congestion.

Intermodal Logistics Centers (ILCs) serve this purpose. Whether privately developed or supported by state funds, ILCs enhance Florida's freight system. More than a port extension or inland development site, they are facilities where two or more modes of transportation meet and exchange goods, sometimes aided by added-value services such as warehousing, transload, trailer and container staging and related activities. They efficiently link seaports, highways, railroads, cargo aircraft and freight services.

WHAT IS AN INTERMODAL LOGISTICS CENTER?

Compare an ILC to a massive highway interchange — except at an ILC, not only can goods change direction, they can change transportation modes or even go into storage. ILCs add value by allowing shippers to employ built-in advantages of each transportation form at the right place and the right time. Using an ILC as a meeting point, shippers can balance the cost, speed and flexibility they need.

Figure ES-1: Existing, Emerging and Other Florida ILCs of Note



In the post-2020, web-based economy, consumers and shippers prize quick, flexible systems that are resilient in the face of uncertainty. Gone is the emphasis on a centralized, highly regimented logistics ideal. Today, distribution centers and ILCs are key hubs in a decentralized web of freight activities. Online order fulfillment centers, box store distribution centers and privately owned ILCs are constructed largely outside major gateways and metropolitan areas.

1 Stefan Rayer and Conor Comfort, Projections of Florida Population by County, 2025–2050, with Estimates for 2023, Florida Population Studies, vol. 57, Bulletin 198 (Gainesville: Bureau of Economic and Business Research, University of Florida, January 2024), https://bebr.ufl.edu/wp-content/uploads/2024/01/projections_2024.pdf

2 SelectFlorida, Inc., 2024 Annual Report on Florida-Origin Exports & Florida-Destination Imports Summary (Coral Gables, FL: SelectFlorida, Inc., February 2025), https://selectflorida.org/wp-content/uploads/Annual-FL-Origin-Exports-and-Destination-Imports-Summary.pdf.

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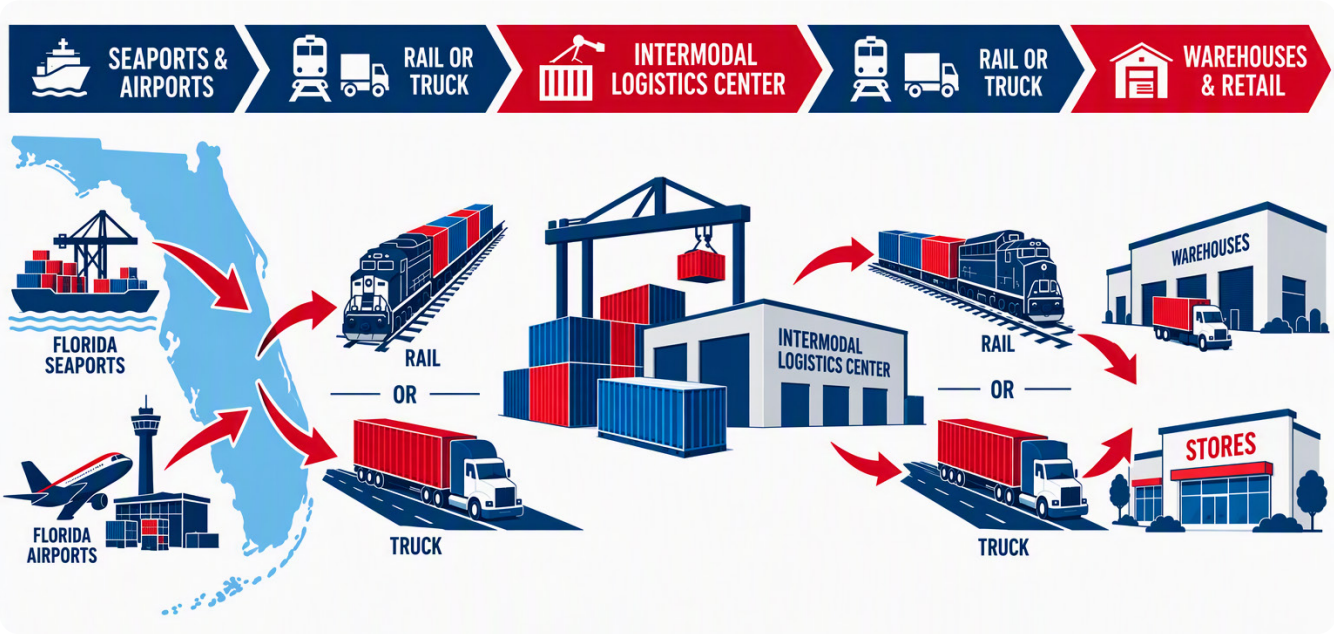
WHY IS FLORIDA INVESTING IN ILCS?

The State of Florida has established an ILC infrastructure support program to encourage growth in the flow of goods through the state's seaports and airports, and to attract more ILCs and distribution centers. By driving investment in qualified projects that would not otherwise happen, Florida's economy can better respond to private sector market demands and meet the state's economic development goal of becoming a hub for trade, logistics, and export-oriented activities.

In recent years, Florida began employing an industry innovation, establishing ILCs adjacent to, but not within existing seaports and building inland locations where lower land costs and rail/highway connections exist. In each case, the ILC removes many functions — especially warehousing — from congested seaport sites, reducing delay and operational costs and smoothing freight movement through supply chains.

In addition to direct freight benefits, establishing freight interchange and processing locations adjacent or inland of established ports increases Florida's resiliency in emergency events and reduces personal travel congestion.

Figure ES-2: ILC Role in Supply Chain



HOW DID THE FLORIDA ILC WORKING GROUP COME ABOUT?

Florida Statute Section 311.101 directs the ILC Working Group to build on a decade of studies and program experience and to develop recommendations to strengthen the ILC Infrastructure Support Program.

The Working Group, with the assistance of state agencies, regional partners, industry stakeholders and other experts, evaluated needs, projected benefits and existing strategies to identify flexible, practical solutions which guide investment of state resources in ready projects that:

- Address a demonstrated need
- Strengthen the freight system
- Support economic growth
- Deliver measurable public value

This work builds upon other research such as the Florida Seaport Transportation and Economic Development Council's 2018 study, *Attracting Distribution Center and Related Logistics Investment to Florida to Anchor Traffic through Florida Ports*. It takes into account the wholesale supply chain reconfiguration begun in 2020, continued freight decentralization and reshoring efforts.

The ILC Working Group seeks to identify and implement freight efficiency recommendations to increase Florida's domestic and global economic competitiveness.

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HOW SHOULD FLORIDA CONSTRUCT ITS ILC INVESTMENTS?



- Identify a validated regional freight or market need.
- Define whether an ILC is the appropriate response, as well as what type of facility or investment best fits the need.
- Confirm project readiness by verifying the project is technically, financially and operationally ready to advance.Yes
- Demonstrate the public value of the ILC project by showing that it possesses measurable transportation, economic, and community benefits that support state and regional goals.
- Invest strategically by sizing and structuring the public investment consistent with program intent and available funding.
- Track performance of the investment against clear measures to demonstrate accountability and long-term value.

Performance management through result monitoring tracks individual project levels of success and builds a knowledge base gained from experience.

THE BOTTOM LINE – POTENTIAL STATEWIDE BENEFITS

If Florida expands Intermodal Logistics Centers using the framework proposed in this report, the state stands to gain:

1. Reduced freight congestion and enhanced transportation efficiency.
2. More resilient supply chains, especially during emergencies and disruptions.
3. Stronger seaport competitiveness with domestic and international trade growth.
4. Additional jobs, private investment, and tax base expansion.
5. Economic development opportunities for rural and inland communities.
6. Better utilization of existing highways, railroads, ports, and airports.
7. A more flexible statewide freight network capable of supporting Florida's long-term growth.

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WORKING GROUP RECOMMENDATIONS

The six recommendations below are the Working Group's implementation themes. Together they move the program from eligibility-driven participation toward a deliberate investment process.

1	**DEFINE THE PRODUCT**	Clarify what constitutes an ILC and how ILCs relate to other freight and logistics facilities.
2	**COORDINATE A STATEWIDE ILC STRATEGY**	Develop a statewide strategy and evaluate ILC and distribution center needs every three years to identify trends and gaps.
3	**FUND DEMONSTRATED NEED**	Target state participation to a demonstrated and meaningful freight, logistics, seaport, commodity, market, or economic-development need or opportunity.
4	**FUND READY PARTNERSHIPS**	Ensure projects can be delivered and operated successfully, with mature site, ownership, infrastructure, partnerships, access, and operating conditions.
5	**RIGHT-SIZE PUBLIC INVESTMENT**	Tailor the level of state participation based on scale, maturity, risk, public value, available leverage, and certainty of expected results.
6	**MEASURE THE RETURN**	Link performance measurement to the reason for investment, with defined outcomes, baseline, key metrics, and reporting expectations.

POLICY AND STATUTORY ISSUES FOR CONSIDERATION

The Working Group's recommendations require varied implementation pathways – legislation, administrative rulemaking, or FDOT program guidance. The following paths can move this process forward.

A — STATUTORY CHANGES FOR CONSIDERATION

- Clarify the ILC definition and eligible functions.
- Support right-sized state participation.
- Improve coordination with freight logistics zone designation and funding processes, while maintaining the distinction between the two frameworks.

B — ADMINISTRATIVE RULE REVIEW

- Review Chapter 14-118, F.A.C., for conforming changes to definitions, eligibility, application and award procedures, evaluation requirements, and monitoring provisions.
- Align rule language with any statutory amendments adopted as a result of the Working Group's recommendations.

C — PROGRAM IMPLEMENTATION

- Maintain application, screening, evaluation, agreement, and performance tools that implement the revised investment framework.
- Incorporate Work Program programming into the process between selection/recommendation and award.
- Coordinate ILC planning and investment information with statewide freight planning, regional planning, economic-development partmers, and freight logistics zone activities where applicable.

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PURPOSE:

The purpose of the Intermodal Logistics Center Working Group Draft Report is to develop consensus on the key elements of a long-term statewide strategy needed to enhance Florida's future and policy changes required to implement. The Draft Report is designed to be an organized starting point to solicit meaningful feedback from Working Group Members.

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INTRODUCTION

Florida's freight economy depends on a connected network of seaports, airports, railroads, highways, warehousing, distribution, and other logistics assets. Intermodal Logistics Centers (ILCs) can strengthen that network by connecting freight gateways to inland markets, relieving constraints, expanding market access, improving supply-chain performance, and supporting economic competitiveness. The value of an ILC depends on the specific need it addresses and how the investment in an ILC fits within the larger freight system.

An ILC is a facility or group of facilities that provides intermodal freight transfer and logistics functions in a specific area in support of a seaport or freight airport. Under current Florida law, an ILC is physically separated from a seaport, with activities designed to support or be supported by freight conveyance or shipping through one or more seaports or qualifying airports. Florida's opportunities vary. Regions face different combinations of congestion, land and terminal constraints, market opportunities, connectivity, development conditions, and infrastructure needs.

ILCs can solve freight transportation issues and/or open new markets for business, benefiting a single operation or an entire region. The process described in this report focuses on when public investment in an ILC project is justified. Private enterprise may have market reasons to build and seek government participation; however, public return on investment must be the driver for use of public funds.

The Working Group concluded that state participation is best guided by one statewide investment standard that begins with demonstrated need and determines whether an ILC is an appropriate response. The framework then tests readiness, public value, the appropriate level of state participation, and the results expected from the investment.

This approach builds on more than a decade of Florida experience. Early inland-port feasibility and market work preceded the 2012 creation of the ILC Infrastructure Support Program and FDOT's development of ILC criteria for the Strategic Intermodal System. Initial program awards began in 2013, while statewide trade and logistics studies continued to refine the role of ILCs. The 2023 FDOT *Intermodal Logistics Centers Serving Florida Seaports Study* established the most recent statewide strategic foundation. The Working Group carried that experience forward by translating strategy into a clearer framework for deciding when, where, and how state-supported ILC investment is justified.

CORE INVESTMENT PRINCIPLE: ***The need should define the investment.***

SIX IMPLEMENTATION THEMES



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1. WHY ILCS MATTER TO FLORIDA?

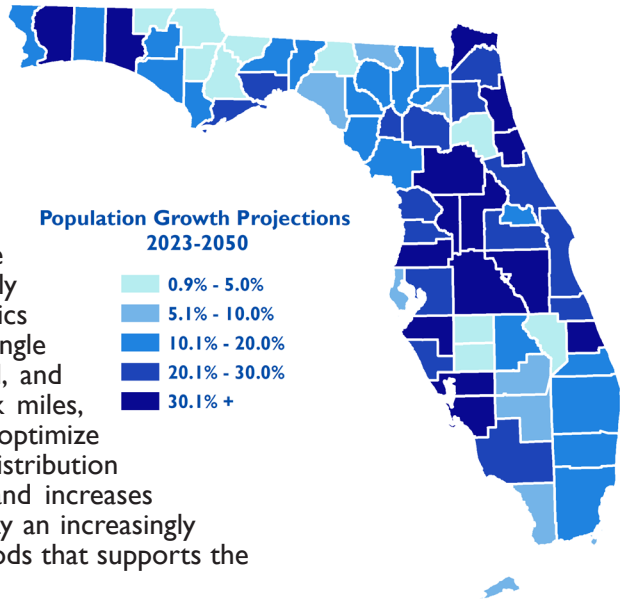
An ILC is more than an additional development site. It is a strategic component of Florida's freight network. It may connect seaports, railroads, highways, airports, warehouses, distribution facilities, transload operations, storage, truck staging, and other logistics functions. An ILC's value depends on how those functions, the site, transportation connections, and operating relationships address a documented need.

Florida operates a distinctive freight system: a large, consumption-driven market served by multiple freight gateways. Population growth, tourism, e-commerce, international trade, and relationships with Latin America and the Caribbean create decentralized and multimodal logistics needs. In addition, the demands on the freight system continue to grow as industry, tourism and population all continue to increase throughout the state. The appropriate investment opportunity for ILCs can serve as a catalyst for increasing Florida's supply chain competitiveness.

THE ILC PROGRAM AS A CATALYST FOR GROWTH

Florida is a state that has seen tremendous growth and as seen in Figure 1[1], is projected to continue to increase in population in every county in the state through 2050 with a 24% increase statewide, adding an additional 5.4 million residents. This projected increase in population will also increase the demand for more goods, materials, food, and e-commerce deliveries. As millions of additional residents and businesses rely on the movement of freight throughout the state, the volume of cargo flowing through Florida's seaports, airports, rail networks, and highways will continue to rise. Meeting this demand will require transportation systems that can move goods more efficiently while minimizing congestion and costs. Intermodal Logistics Centers bring together multiple transportation modes in a single location and enable seamless transfers between ship, rail, and truck. By consolidating freight, reducing unnecessary truck miles, and leveraging the long-haul efficiency of rail, ILCs can help optimize supply chains, improve freight reliability, and support the distribution of goods to Florida's growing population. As freight demand increases alongside population growth, ILCs have the potential to play an increasingly important role in maintaining the efficient movement of goods that supports the state's economy and quality of life.

Figure 1: Florida Population Growth Projection



THE ILC LANDSCAPE IN FLORIDA

Figure 2: Existing, Emerging and Other Florida ILCs of Note



The June 2023 FDOT Intermodal Logistics Centers Serving Florida Seaports Study addresses three existing ILCs in the state. The standards used by the study to determine the inclusion of these three locations focused on ILCs that are off-port facilities, operate at a statewide scale, and have a substantial master plan, which proposes future build out scenarios and identifies needed services and capabilities in order to attract tenants.

The three ILC facilities identified in the 2023 study include America's Gateway Logistics Center (Moore Haven); Central Florida ILC (CFILC) (Winter Haven); and Gulf of Gadsden Freight Logistics Zone (Gadsden County and Port St. Joe). Figure 2 displays the location of each site. It is worth noting that, while the 2023 FDOT ILC Study referenced above identifies these three locations as existing ILCs, the only fully operational facility of these three locations, actively handling containerized cargo, is the CFILC in Winter Haven.

1 The Florida Legislature, Office of Economic & Demographic Research, https://edr.state.fl.us/content/population-demographics/data/index-floridaproducts.cfm

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In addition to the ILCs identified in the 2023 FDOT Intermodal Logistics Centers Serving Florida Seaports Study, and described above, there are other emerging and existing/operational ILC facilities in Florida worth noting. These locations provide a representative sample of ILCs in the state:

- Port Panama City Intermodal Distribution Center (Existing)
- South Florida Logistics Center (Existing)
- Port Manatee Commerce Center (Existing)
- South Florida Intermodal Logistics Center (Emerging)

FLORIDA ILC INFRASTRUCTURE SUPPORT PROGRAM

The Florida Intermodal Logistic Center Infrastructure Support Program, enabled by Florida Statutes Section 341.053, is a state, project-based, grant program administered by FDOT. The program, formally launched in 2013, strengthens Florida's freight and supply chain by providing grant funding for the development of infrastructure projects at inland logistics hubs connected to ports, rail, and highways. Eligible projects should meet one or more the following of Florida's freight and intermodal goals, including:

1. Reduce congestion at seaports
2. Improve supply chain efficiency
3. Support economic development
4. Maximize port competitiveness

Table 1 provides a summary of previous Florida Intermodal Logistic Center Infrastructure Support Program awardees. Some facilities receiving awards were not captured within the Existing and Emerging ILCs section as their location (on-port terminal), servicing area (regional vs. statewide), and/or scope of operations do not meet the threshold intended for this criteria.

Table 1: Florida Intermodal Logistic Center Infrastructure Support Program Past Awards

TOTAL AWARDS	TOTAL FUNDING	AVERAGE AWARD
18	**$32.5 Million**	**$1.8 Million**

Year of Award	Awardee	Funding Amount
2013	Federal Port Corporation @ Port Manatee Commerce Center	$250,000
	Keystone Properties LLC	$1,425,000
	Panama City Port Authority	$900,000
	FDG Hialeah L.L.C. and SFLC Building 1 LLC	$2,500,000
2014	Keystone Properties LLC	$825,000
	Section 31 Holdings LLC	$2,500,000
	Prologis (AMB I-75 LLC)	$1,600,000
	Prologis (AMB I-75 LLC)	$900,000
2017	JAX LNG LLC	$2,500,00
2018	Panama City Port Authority	$220,000
	Countyline 2 LLC	$2,390,000
	CP Logistics Westview LLC	$2,390,000
2019	Allied New Technologies 2	$2,500,000
	CCP Central LLC	$2,500,000
2020	Beacon Lakes Phase IV	$2,500,000
	CP Logistics Opa Locka LLC	$1,048,658
	EastGroup Properties	$545,000
2025	InLight Real Estate Partners	$7,500,000

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WHY THIS REPORT EXISTS

Florida has accumulated more than a decade of ILC studies, program experience, and investment activity. This report translates that experience into a clearer framework for determining when, where, and how state-supported ILC investment is justified.

Section 311.101, Florida Statutes, directs the ILC Working Group to evaluate regional needs for ILC development, including differences between urban and rural areas, and to assess how ILCs can support Florida's freight transportation system.

THE LEGISLATIVE ASSIGNMENT

To address this assignment, the Working Group organized its review around six questions. Together, these questions define the regional, system, public value, and project-level considerations that informed the Working Group's conclusions.

- Where are ILCs most needed, and how do needs differ by region and port?
- What transportation, supply-chain, economic, and resilience benefits can justify state investment?
- How will ILC development interact with freight rail capacity, service, safety, and existing passenger movements?
- How should ILCs relate to the Strategic Intermodal System and broader state policy and planning?
- How can freight logistics zones complement ILC planning, designation, and investment, and are changes needed to their designation or funding processes?
- What readiness, market, land-use, partnership, and performance factors should guide investment?

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2. FLORIDA'S ILC STRATEGY HAS EVOLVED

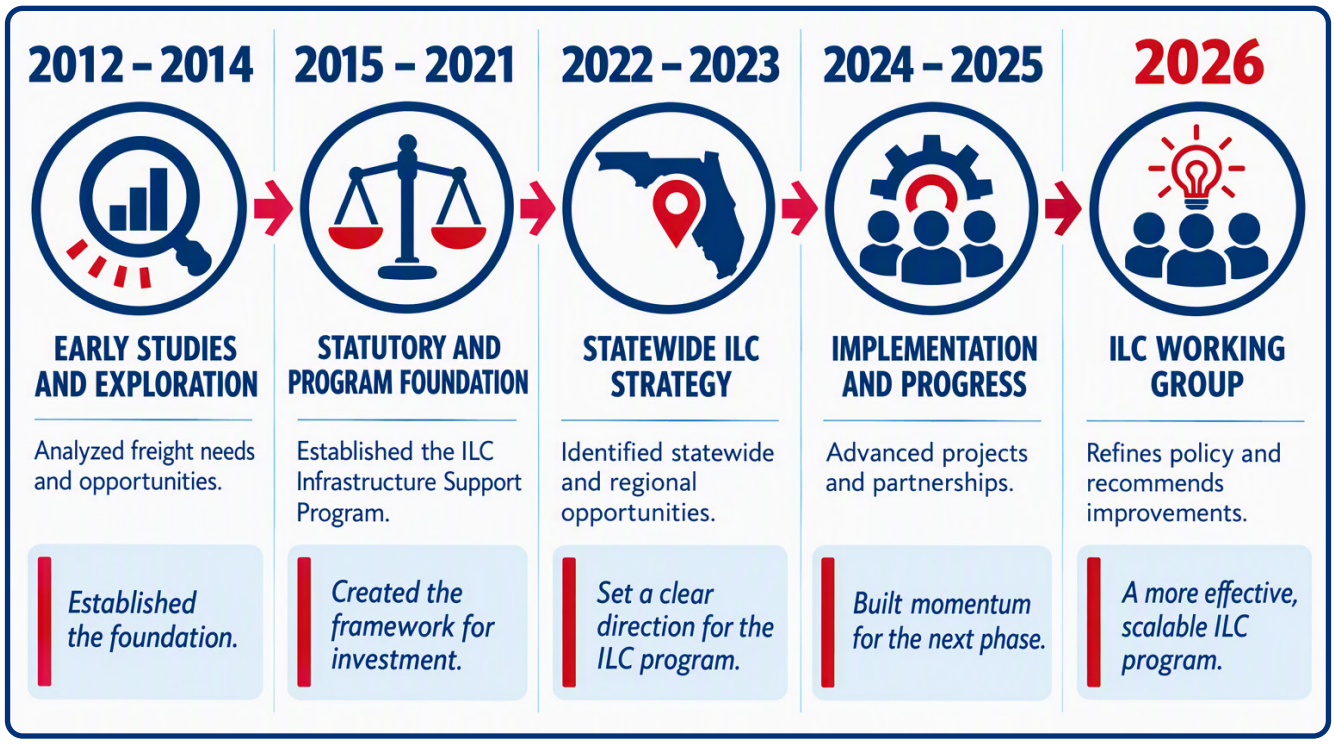
Florida's ILC experience extends well beyond the 2023 statewide study. Early work included the 2007 South Florida Inland Port Feasibility Study and a 2008 preliminary market analysis. In 2012, the Legislature established the ILC Infrastructure Support Program and directed FDOT to develop criteria for recognizing ILCs within the Strategic Intermodal System. FDOT issued ILC Strategic Intermodal System (SIS) implementation guidance in 2014, and statewide program awards began in 2013.

In 2018, Florida Seaport Transportation and Economic Development Council (FSTED) conducted a study for *Attracting Distribution Center and Related Logistics Investment to Florida to Anchor Traffic through Florida Ports* and ultimately determined that Florida's success is not in competing nationally, but primarily focusing on serving its own large and rapidly growing consumer market and implementing logistics facilities within the state, consistent with the ILC solutions displayed in Section 1. Florida's current population alone justifies dedicated supply chains and providing opportunities for the market to serve Florida from within would significantly reduce trucking costs from being served by out of state ports and distribution centers. Since the 2018 study, the population has continued to increase and the impacts from the COVID-19 pandemic have rapidly accelerated the e-commerce and same-day/ next-day delivery access that continue expansion today.

Florida Trade & Logistics Study 2.0 and *Florida Trade & Logistics 2030* subsequently refined the concept. The June 2023 FDOT *Intermodal Logistics Centers Serving Florida Seaports Study* established the most recent statewide strategic foundation, emphasizing coordination, regional differentiation, benefit-based investment, and market development.

The Working Group's work represents the next step in that evolution: moving from a strategy that describes ILC opportunities toward a decision framework that establishes the conditions under which future state-supported investment proceeds.

Figure 3: Evolution of Florida's ILC Strategy



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3. ADVANCING THE ILC PROGRAM

The Working Group identified an opportunity to clarify the program, making it more strategic and more effective without losing flexibility for different regional conditions.

The central distinction is between a project that is **eligible** for consideration and a project that presents a **compelling case** for public investment. Eligibility establishes the program boundary. It does not, by itself, establish the investment decision.

The Working Group found that program clarity must be accompanied by a consistent method to distinguish projects that meet basic program requirements from projects that demonstrate a compelling case for state participation. That distinction becomes increasingly important as projects vary in scale, maturity, market conditions, and delivery risk.

The program must recognize differences in project scale and maturity. A planning or readiness-stage effort does not carry the same administrative burden as a major capital investment, and a project with material delivery risk warrants more intensive oversight.

Funding adequacy is part of program design. If awards are too small relative to the scope and cost of eligible investments, the program may not be positioned to produce meaningful transportation or economic impacts. Funding levels and structures therefore need to be aligned with project scale and public value, with a different funding or statutory approach considered where strategically significant investments warrant it.

Table 2 distinguishes the existing statutory and administrative foundation from the proposed advancement of the program.

Table 2: Current Program Foundation vs. Proposed Advancement

Current Program Foundation	Proposed Advancement
Section 311.101, F.S., and Chapter 14-118, F.A.C., establish the existing ILC Infrastructure Support Program framework.	Recommendations that change eligibility, evaluation, funding, program structure, or monitoring are proposed changes and are assigned to the appropriate statutory, rule making, or program-guidance pathway.

The final report maintains this distinction throughout. Where implementation may require administrative rule making, the appropriate pathway is identified and must be confirmed by FDOT before adoption.

STRATEGIC ADAPTABILITY OF THE ILC PROGRAM

The Florida ILC Infrastructure Support Program was established to help advance projects that strengthen freight mobility, support seaport connectivity, and enhance Florida's economic competitiveness. Florida's freight system is dynamic, and the infrastructure requirements of a mature rail-served logistics center may differ significantly from those of an emerging inland freight hub or a strategic seaport support facility. A rigid funding framework may unintentionally limit the state's ability to invest in projects that provide significant public value but do not fit a predetermined formula.

Instead, investment decisions should be guided by demonstrated need, project readiness, public benefit, and the extent to which a project advances statewide freight and economic development goals. This approach is consistent with the Working Group's conclusion that "the need should define the investment" (expanded in Section 5 of this document) and that state participation should be guided by demonstrated public value rather than project eligibility alone. Public participation should focus on transportation-related infrastructure and freight network improvements that produce benefits extending beyond the project sponsor and support the performance of Florida's broader freight system. In this role, public funding acts as a catalyst for economic activity rather than a substitute for private capital.

FDOT should retain the authority to review and modify program criteria, funding priorities, and implementation requirements on a recurring three-year cycle to ensure the ILC Infrastructure Support Program remains aligned with evolving freight markets, supply chain trends, economic development opportunities, and statewide transportation needs. Regular program reviews would allow the state to respond to changing conditions while preserving the flexibility needed to direct limited public resources toward projects that deliver the greatest public benefit and support Florida's long-term freight strategy.

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4. REGIONAL NEEDS AND ILC INVESTMENT APPROACHES

Florida's geography, freight markets, port conditions, land availability, rail and highway connectivity, and development patterns make a single statewide ILC facility model impractical. Regional differentiation does not require separate programs. Rather, it calls for one statewide investment standard applied to different freight conditions.

START WITH THE REGIONAL NEED

Then determine what ILC function or combination of functions could appropriately address it.

This sequence matters because the same ILC characteristic can have very different value in different markets. A rail connection, for example, may address a significant constraint in one region while adding limited public value in another. An emerging logistics opportunity may likewise require a different combination of functions than a project intended primarily to relieve an existing port or highway constraint. The investment case therefore begins with the regional condition and works toward the facility characteristics needed to address it.

Potential approaches may be constraint-driven, opportunity-driven, port-oriented, rail-oriented, highway-oriented, aviation/multimodal, or combinations of these. These characteristics are lenses for evaluating the role an ILC may serve.

The public value of the same project characteristic can differ by context. A constrained urban or port market may derive value from relieving capacity, congestion, or terminal-space constraints. An inland or emerging market may depend more heavily on demonstrated demand, infrastructure readiness, development conditions, and the ability to attract or support new freight activity.

Potential regional concepts identified through technical work are therefore opportunities for evaluation, not predetermined state priorities.

LEVERAGING CHANGE REGIONALLY AND STATEWIDE

Following the process laid out in Section 3, *Strategic Adaptability of the ILC Program*, will allow FDOT to adapt to meet the changing needs of the state and regions. Regular program reviews ensure that funding criteria and eligibility requirements can be adjusted to address changing market conditions, emerging supply chain trends, and new freight movement patterns across the state. Administrative flexibility allows FDOT to target investments toward infrastructure projects that deliver the greatest public return, improve freight mobility, and address critical bottlenecks in diverse regions of Florida. At the same time, a continuous program implementation and evaluation process enables lessons learned from completed projects to inform future investment decisions, ensuring resources are directed to the most effective freight and logistics solutions. Collectively, these three processes promote a more responsive and data-driven program that strengthens Florida's freight network, supports regional economic competitiveness, enhances statewide supply chain resiliency, and maximizes the long-term value of public infrastructure investments.



LEVERAGING SEAPORT INVESTMENTS

Florida's seaports are entering a new phase of investment focused on expanding cargo capacity, modernizing terminals, improving berth and channel infrastructure, and strengthening connections to supply chains. At the same time, Florida's continued population growth, expanding consumer demand, and growth in e-commerce will place additional pressure on the freight network.

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Florida's seaports are programmed to receive more than $7 billion in planned investments over the next five years, creating a significant opportunity to leverage and amplify these improvements through the ILC Infrastructure Support Program. As ports expand cargo-handling capacity and attract additional freight activity, strategic investments in ILC infrastructure can extend the benefits beyond the port gate by improving rail connectivity, distribution capacity, and freight mobility throughout the state. This coordinated approach can help reduce congestion, improve supply chain efficiency, and maximize the return on public investments while supporting Florida's long-term economic competitiveness. Table 3 below shows the planned investment by port over the next five years that can be leveraged into accelerating ILC projects to improve freight flow throughout the state.

Table 3: Summary of Planned Capital Investment by Seaport

Port	FY 25/26	FY 26/27	FY 27/28	FY 28/29	FY 29/30	Total
Port Canaveral	$258.2M	$181.2M	$325.6M	$121.1M	$26.4M	$912.4M
Port Citrus	$5.0M	$0.0M	$15.5M	$15.5M	$11.0M	$47.0M
Port Everglades	$169.9M	$299.0M	$260.0M	$150.0M	$85.5M	$964.3M
Port of Fernandina	$10.5M	$8.5M	$4.9M	$1.1M	$0.0M	$25.0M
Port of Fort Pierce	$9.0M	$14.5M	$5.0M	$0.0M	$0.0M	$28.5M
JAXPORT	$173.1M	$148.6M	$132.8M	$114.0M	$75.5M	$643.9M
Port of Key West	$6.5M	$0.0M	$0.0M	$0.0M	$0.0M	$6.5M
SeaPort Manatee	$37.5M	$67.0M	$5.1M	$5.1M	$5.1M	$120.0M
PortMiami	$630.8M	$877.4M	$518.7M	$399.0M	$276.7M	$2,702.6M
Port of Palm Beach	$5.9M	$26.6M	$39.6M	$37.1M	$15.1M	$124.2M
Port Panama City	$32.6M	$25.7M	$20.9M	$7.6M	$57.1M	$143.9M
Port of Pensacola	$1.3M	$14.8M	$7.0M	$0.0M	$0.0M	$23.0M
Port Putnam	$1.2M	$1.8M	$12.0M	$23.7M	$17.5M	$56.2M
Port St. Pete	$0.3M	$0.0M	$0.0M	$0.0M	$0.0M	$0.3M
Port Tampa Bay	$136.2M	$284.1M	$380.3M	$201.5M	$228.8M	$1,230.9M
Total	**$1,478.1M**	**$1,949.1M**	**$1,727.3M**	**$1,075.6M**	**$798.6M**	**$7,028.8M**

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5. THE ILC INVESTMENT FRAMEWORK

The investment framework creates a common statewide standard while allowing the evidence required at each stage to vary with project size, risk, complexity, maturity, and claimed public benefit. It is cumulative: early screening determines whether a concept warrants further development, while later stages add the evidence needed for an increasingly consequential public investment decision. The framework operates interdependently with Florida's existing planning and investment processes, bringing those perspectives together when determining whether a specific ILC investment addresses an identified need and creates sufficient public value.

The framework is intended to operate interdependently with Florida's existing planning and investment processes. It provides a consistent way to bring those planning perspectives together when determining whether a specific ILC investment addresses an identified need and creates sufficient public value.

ILCS WITHIN THE BROADER PLANNING SYSTEM

An ILC's public value often depends on connections to highways, rail corridors, seaports, airports, and other freight-network elements. State and regional planning can help identify and validate opportunities before an application reaches the funding decision.

The Strategic Intermodal System, Florida Transportation Plan, Florida Rail System Plan, statewide freight and systems planning, seaport and airport planning, MPO/TPO freight planning, and relevant economic-development programs provide complementary perspectives on freight flows, network priorities, connectivity, capacity, constraints, and future investment needs. Commerce and other partners can add useful context without turning the ILC program into a substitute for those programs.

Alignment with an applicable state, regional, or economic-development plan or program can provide evidence that a proposed project responds to an identified need or priority. The framework does not require every project to align with every relevant plan. A meaningful connection to at least one applicable plan or program is demonstrated and considered as part of the overall investment case. Figure 4 illustrates how these planning and policy perspectives come together around an ILC investment decision.

THE ILC INVESTMENT TEST

The investment framework provides the structure for decision-making, while the investment test provides the standard for determining whether a specific project presents a compelling case for state participation. The test brings together six questions that must be answered before public investment is justified: Is there a demonstrated need or opportunity? Is an ILC an appropriate response? Is the project ready to advance? Will the project produce meaningful public value? Is the proposed level of state participation appropriate? And are the expected project results measurable?

The strongest proposals connect the freight or market problem, the proposed ILC response, the operational change it is expected to produce, the resulting public benefit, and the measures that will demonstrate whether that benefit has been realized. The evidence supporting that case is proportionate to the project's size, complexity, risk, maturity, and claimed public benefit. The test provides one statewide standard while allowing the investment rationale to reflect regional conditions and the role the proposed ILC would play within Florida's broader freight system.

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6. APPLYING THE FRAMEWORK

NEED AND MARKET VALIDATION

The first substantive question is whether a demonstrated freight, logistics, seaport, commodity, market, or economic-development need or opportunity warrants consideration of the proposed investment.

The evidence establishes both the existence of the need and the relationship between that need and the proposed ILC response. The following considerations identify the types of evidence that can demonstrate that connection, with the level and type of documentation scaled to the nature and maturity of the project.

- Document the freight or market problem, constraint, or opportunity.
- Connect the need to relevant freight flows, commodities, trade lanes, gateways, or market conditions.
- Use port master plans or capital investment programs when port linkage is material.
- Use prospective users, tenant or shipper evidence, market studies, operating commitments, or other credible evidence where demand must be demonstrated.
- Explain why the proposed ILC function is an appropriate response.
- Explain why public participation is warranted, including why the proposed public role addresses a need or produces a benefit that private investment alone is unlikely to address.

READINESS

Readiness asks whether the project has the conditions necessary to move from concept toward implementation and operation. It demonstrates that the project has moved beyond a conceptual opportunity and has the practical conditions necessary to advance. The following considerations identify the core conditions that support implementation, with the evidence scaled to project maturity, complexity, and risk rather than applied as a uniform checklist.

Readiness demonstrates that the project has moved beyond a conceptual opportunity and has the practical conditions necessary to advance. The following considerations identify the core conditions that support implementation, with the evidence scaled to project maturity, complexity, and risk rather than applied as a uniform checklist.

- Confirm ownership, site control, infrastructure, utilities, zoning, and critical third-party agreements.
- Document operating roles and partnerships, including port, rail, and other required participants.
- Confirm highway and freight rail access and the infrastructure needed to support the proposed activity.
- Identify workforce, community, and other material implementation considerations.
- Scale the level of evidence to project maturity, complexity, and risk.

Rail Readiness

Rail readiness focuses on existing freight rail access and the operational conditions required to support the proposed activity rather than requiring direct access to a Class I railroad. Florida's freight network includes Class I and short-line operators, and connections through other carriers can provide access to the national Class I network. Existing access is generally preferable where it avoids the cost, time, and uncertainty of a new publicly funded rail connection.

Evaluation considers carrier access, switching and interchange arrangements, service economics, capacity, highway-rail crossing exposure, safety, and the ability of existing infrastructure and operating conditions to support the proposed freight activity.

PUBLIC VALUE

Public value is the reason state participation can be justified beyond the private business case. An ILC may create value by improving freight mobility and reliability, increasing throughput or capacity, enabling more efficient use of

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rail and other modes, improving safety, strengthening resilience, supporting communities, or expanding economic competitiveness. The relevant benefits depend on the need being addressed and the role the proposed ILC would play in the regional freight system.

Public benefit and commercial feasibility are related but distinct. Statewide freight, economic, and supply-chain information can establish strategic context, but project-specific evidence is needed to demonstrate that the proposed investment will produce the claimed benefit. The strongest investment cases connect the funded improvement to an operational change, the operational change to a public benefit, and the public benefit to an outcome that can be measured. Increased cargo moved through Florida airports and seaports creates jobs and lowers prices for Florida consumers and businesses.

INVESTMENT CONSIDERATIONS

Investment considerations determine whether the identified public value warrants the proposed level and structure of state participation. Evaluation considers the total project cost, the amount and timing of other committed or reasonably available funding, private and local participation, alternatives, delivery risk, and the extent to which state funds can leverage other investments. A project that creates substantial value may still require a different funding approach if the proposed state share is disproportionate to the benefit or risk.

The funding and administrative approach is right-sized to the project. Planning or readiness-stage activities do not carry the same burden as major capital investments, while projects with greater cost, complexity, or delivery risk warrant greater documentation and oversight. Where a strategically significant investment exceeds the practical capacity of the existing program, the appropriate question is whether a different funding structure or statutory approach is warranted, not whether the investment case should be weakened.

MEASURABLE RESULTS

Measurable results complete the investment logic by establishing what success means before funds are committed. The expected outcome, baseline condition, principal benefit metric, supporting measure where appropriate, data source, and reporting expectations are identified as part of the investment decision. Measures are tied directly to the funded scope and the principal public purpose rather than applied as a generic program-wide scorecard.

Performance measurement also distinguishes delivery from outcomes. Delivery monitoring confirms that the approved scope, commitments, milestones, and agreement requirements are met; performance measurement determines whether the completed investment produced the public benefit that justified state participation. Some outcomes—such as tenant occupancy, customer commitments, rail service patterns, routing decisions, or economic activity—may mature over several years. Results therefore support both accountability and lessons that improve future ILC investment decisions.

PROJECT EVALUATION

Project evaluation brings the full investment case together and determines whether the proposed investment provides sufficient public value relative to cost, risk, alternatives, leverage, and expected results. It combines statewide strategic context with project-specific market and feasibility evidence.

The determination considers the validated need or opportunity, the appropriateness of the ILC response, readiness, public value, the level of state participation, and the results expected from the investment. The following considerations focus that determination on system contribution, expected benefits, delivery cost and risk, alternatives, and the extent to which other funding or investments can leverage the state's participation.

- Assess network capacity and system integration.
- Identify rail access arrangements, expected service patterns, and material capacity constraints.
- Evaluate highway and highway-rail crossing implications of new freight activity.
- Identify related transportation improvements necessary to make the ILC operationally effective.
- Treat SIS designation or connectivity as a strategic consideration.

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7. WORKING GROUP RECOMMENDATIONS

The six recommendations below are the Working Group's implementation themes. Together they move the program from eligibility-driven participation toward a deliberate investment process.

Figure 6: Working Group Recommendations



RECOMMENDATION 1: DEFINE THE PRODUCT

The current program would benefit from a clearer description of what constitutes an ILC and how ILCs relate to other freight and logistics facilities. Greater clarity would help applicants understand what the program is intended to support while giving FDOT a more consistent basis for evaluating projects. The following actions would provide that clarity while establishing common characteristics without restricting the range of functions that may be appropriate in different regional contexts.

- Establish clear ILC definitions and eligible functions that distinguish intermodal logistics from conventional warehousing, industrial development, and on-port activities.
- Clarify relationships among ILCs, freight logistics zones, ports, airports, rail facilities, logistics parks, and related facilities
- Use investment approaches such as constraint-driven and opportunity-driven without creating separate program categories.

RECOMMENDATION 2: COORDINATE A STATEWIDE ILC STRATEGY

A statewide strategy can provide continuity beyond individual funding cycles and help FDOT and its partners maintain a common understanding of Florida's ILC opportunities, capabilities, and investment pipeline. It can also provide a clearer connection to freight logistics zones, which are a related statutory planning and funding framework rather than a substitute for the ILC investment framework. The following actions would strengthen that continuity and create a stronger connection between project-level decisions and broader freight, economic

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development, and market conditions.

- Carry forward the statewide coordination concept through a durable strategy, inventory, project pipeline, and source of market and industry intelligence.
- Define roles for program administration, statewide freight planning, regional coordination, and industry engagement
- Maintain consistent information about Florida ILC opportunities and capabilities.

RECOMMENDATION 3: FUND DEMONSTRATED NEED

State participation should respond to a demonstrated freight, logistics, seaport, commodity, market, or economic-development need or opportunity. Establishing need first helps ensure that an ILC investment is solving a meaningful problem or advancing a credible opportunity rather than allowing the proposed facility to define the justification for the investment. The following actions put that principle into the project-selection process.

- Make documented need and market validation the foundation of project selection.
- Use port master plans and capital investment programs where port linkage is material.
- Require project-specific market evidence where commercial feasibility is material.
- Connect the proposed ILC function directly to the problem or opportunity being addressed.
- Explain why state participation is warranted, including the public need or benefit addressed and the role of private, local, and other funding.

RECOMMENDATION 4: FUND READY PARTNERSHIPS

A compelling need is only sufficient if a project can be delivered and operated successfully. Readiness provides the bridge between a strong investment case and a realistic path to implementation by demonstrating that the site, ownership, infrastructure, partnerships, access, and operating conditions are sufficiently mature for the proposed stage of investment. The following considerations identify the readiness evidence supporting that determination.

- Prioritize projects with the ownership, site control, infrastructure, partnerships, and operating model needed to move toward operation.
- Document rail and highway access, utilities, workforce, zoning, community considerations, and critical third-party agreements.
- Establish minimum readiness expectations while scaling evidence to project characteristics.

RECOMMENDATION 5: RIGHT-SIZE PUBLIC INVESTMENT

The appropriate level of state participation depends on more than project cost. Scale, maturity, risk, public value, available leverage, and the certainty of expected results influence both the funding structure and the administrative requirements applied to a project. The following actions apply that right-sized approach while preserving rigor and avoiding unnecessary burden on smaller or earlier-stage efforts.

- Match funding structure and administrative requirements to project size, risk, complexity, maturity, and public benefit.
- Consider whether strategically significant projects require a different funding structure or statutory approach.
- Require a clear scope, schedule, match, risk framework, and deliverables; use phased or milestone-based funding where appropriate.

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RECOMMENDATION 6: MEASURE THE RETURN

Performance measurement is most useful when it is connected to the reason the state chose to invest. Establishing the intended outcome, baseline, principal benefit metric, and reporting expectations at the time of investment creates a direct line between the decision to fund a project and the state's ability to determine whether the expected benefit was produced. The following actions establish that accountability from the beginning.

- Make accountability part of the investment decision from the beginning.
- Establish a baseline and one principal benefit metric, with a supporting measure where appropriate.
- Use credible, obtainable data and explain material variances or external factors.
- Separate delivery/compliance monitoring from post-completion performance measurement and use results to improve future decisions.

POLICY AND STATUTORY DIRECTIONS

The Working Group's recommendations require varied implementation pathways. Some require legislation, some require administrative rule making, and others can be implemented through program guidance, application materials, evaluation tools, agreements, or internal processes. The following directions distinguish those pathways so that each recommendation can be advanced through the appropriate mechanism and validated through FDOT leadership, legal, and legislative review.

A. Statutory Changes for Consideration

- Consider amending Section 311.101(2), Florida Statutes, to clarify the ILC definition and eligible functions, if FDOT determines that the current statutory scope does not fully support the intended program purpose, including resolution of the statute's current reference to both seaports and airports.
- Consider statutory changes that support right-sized state participation, including strategically significant investments when justified, while preserving the existing statutory funding framework unless a different structure is expressly adopted.
- Consider amendments to Section 311.101(3) that expressly incorporate demonstrated need or opportunity, project readiness, measurable performance expectations, and the appropriate level of state participation into the evaluation framework, while retaining the existing criteria related to strategic state interest, freight movement, economic activity, transportation-system interaction, matching funds, private investment, and local support. Evaluate whether related statutory changes are warranted to better coordinate ILC investment with freight logistics zone designation and funding processes under Section 311.103, while maintaining the distinction between the two frameworks.

B. Administrative Rule Review

- Review Chapter 14-118, F.A.C., for conforming changes to definitions, eligibility, application and award procedures, evaluation requirements, and monitoring provisions.
- Align rule language with any statutory amendments adopted as a result of the Working Group's recommendations.

C. Program Implementation

- Maintain application, screening, evaluation, agreement, and performance tools that implement the revised investment framework.
- Incorporate Work Program programming into the process between selection/recommendation and award
- Coordinate ILC planning and investment information with statewide freight planning, regional planning, economic-development partners, and freight logistics zone activities where applicable.

D. Three-Year Program Review Cycle

- Review program criteria to reflect evolving freight and logistics needs.
- Adjust funding priorities to address emerging statewide transportation opportunities.
- Update implementation requirements to maximize public benefit and program effectiveness.

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The statutory framework establishes the program purpose, definition, evaluation criteria, funding authority, and Working Group responsibilities; the administrative rules establish definitions, eligibility, and application and award procedures; and FDOT's program tools and agreements can implement many operational improvements within those authorities.

Eligible Project Costs

For purposes of the ILC Infrastructure Support Program, an expense is not eligible for FDOT reimbursement solely because it is associated with an otherwise eligible ILC project. To be reimbursable, the expense must support the purposes of the program and be included within the FDOT-approved project scope, financial schedule, and applicable grant agreement. Expenses eligible for inclusion as part of the applicant's required match are not necessarily eligible for direct reimbursement by FDOT. When eligibility is not expressly established, written FDOT approval should be obtained before the cost is incurred. §311.101 currently authorizes FDOT to provide up to 50% of project costs for eligible projects, while eligible projects located in designated Rural Areas of Opportunity may receive up to 100% of project costs.

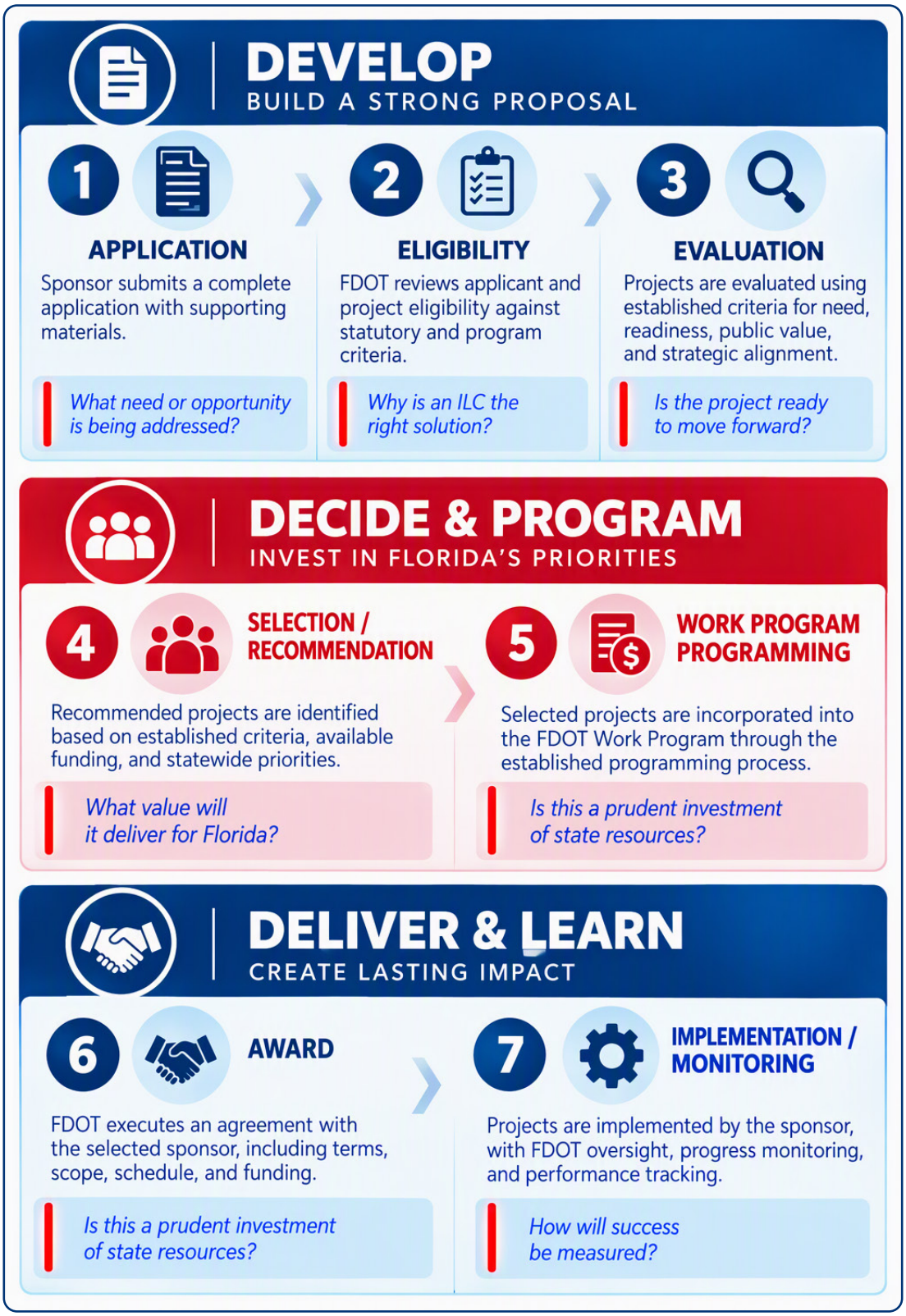
Cost / Activity	Eligibility	Program Treatment
Road Infrastructure & Facilities	Allowable	Construction or improvement of roads that provide for the conveyance or shipment of goods through a seaport to or from an ILC. Rail facilities are expressly identified in §311.101.
Other Freight Transportation Infrastructure	Allowable	Infrastructure providing another means for the conveyance or shipment of goods through a seaport to or from an ILC, when included in the approved project.
Construction, Reconstruction, Rehabilitation or Expansion	Allowable	Eligible when the work is part of the approved ILC transportation-infrastructure scope.
Design & Engineering	Allowable	May be funded when included in the approved project scope and financial schedule and Rule 14-118.003(3) identifies design as a funding phase.
Planning	Match-Eligible	May count toward the applicant's local match, but not eligible for reimbursement.
Preliminary Engineering	Match-Eligible	May count toward the applicant's local match, but not eligible for reimbursement.
Environmental Permitting	Match-Eligible	May count toward the applicant's local match, but not eligible for reimbursement.
Right-of-Way & Land Acquisition	Conditional	Right-of-way may be an authorized scope activity if specifically approved.
Utility Coordination / Relocation	Conditional	Utility coordination may be included within an approved scope.
Construction Inspection, Testing and Acceptance	Conditional	May be eligible when expressly included in the approved project scope and agreement.
Equipment	Conditional	Specific authorization should be required before treating equipment as reimbursable.
Other Project-Specific Costs	Conditional	May only be treated as eligible when expressly authorized by FDOT and incorporated into the approved project scope and financial schedule.
Routine Operations and Maintenance	Unallowable	Not eligible for reimbursement.
Costs Outside the Approved Project Scope	Unallowable	Costs unrelated to or outside the authorized project scope are not eligible for reimbursement.
Costs Outside the Agreement Period	Unallowable	Costs incurred outside the applicable agreement period are not eligible for reimbursement.
Unauthorized Indirect Costs	Unallowable	Indirect costs are not eligible unless specifically authorized.
Fines, Penalties, Judgments, Settlements or Interest	Unallowable	Not eligible for reimbursement unless expressly authorized by FDOT.
Unreasonable, Unnecessary or Unrelated Expenses	Unallowable	Costs determined to be unreasonable, unnecessary, or unrelated to the approved project are not eligible.

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8. FROM INVESTMENT DECISION TO RESULTS

The framework translates into a cumulative, right-sized process rather than a single administrative burden applied uniformly to every project. This process operationalizes the investment framework described in Sections 5 and 6, carrying the decision logic from application through delivery and learning.

Figure 7: Framework to Results



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DELIVERY THROUGH THE PTGA

The Florida Public Transportation Grant Agreement and supporting Grant Administration Manual provide the mechanism for translating an approved investment decision into project-specific scope, funding, deliverables, milestones, responsibilities, reporting, performance, and risk controls.

The final report describes this role at the policy level. Detailed PTGA templates, checklists, and agreement mechanics remain in companion materials unless FDOT leadership determines that a specific element belongs in the final report.

PERFORMANCE BEGINS BEFORE INVESTMENT

Delivery monitoring confirms that the recipient completes the approved scope and complies with the agreement. Performance measurement asks whether the investment generates the public benefits that justified state participation. Both are tied to the original investment decision.

DESIGN THE PERFORMANCE MEASURES BEFORE THE INVESTMENT

The baseline, principal benefit metric, supporting measure, data source, and reporting expectations are established as part of the award. The following practices recognize how ILC outcomes may develop over time while preserving the state's ability to assess whether the intended benefit was produced.

- Recognize that tenant occupancy, customer commitments, rail service patterns, and routing decisions may mature over several years.
- Require recipients to explain material differences between expected and actual performance.
- Use enhanced monitoring and corrective action where material delivery risk exists.

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9. IMPLEMENTATION ROADMAP AND SUCCESS

Deliberate implementation will help FDOT establish the program foundation, test the framework through initial applications and investments, incorporate lessons learned, and refine the approach. This phased approach allows FDOT to use experience and performance results to improve future investments. Table 2 translates that approach into near-, mid-, and longer-term actions.

Table 3: ILC Program Implementation Roadmap

Timing	Priority Action	Primary Responsibility
0–12 months	• Confirm definitions and investment approaches • Finalize screening, readiness, evaluation, and performance criteria • Identify statutory/rule/policy changes • Develop application and agreement tools • Establish the statewide inventory	FDOT Central Office with Working Group input and coordination
1–3 years	• Implement the revised process • Evaluate the first project cycle • Refine criteria based on experience • Institutionalize performance reporting • Develop a repeatable statewide benefit methodology • Develop regional strategies • FDOT coordinates with seaports and airports	FDOT with regional and industry partners
3–5 years	• Advance investments • Reassess needs and markets • Update criteria and measures • Integrate ILC planning more fully with freight rail, seaport, airport, and regional planning	FDOT and partners

STATUTORY, RULE, AND PROGRAM ACTIONS

Implementation distinguishes actions requiring legislation, actions that may require administrative rule making, and actions that can be implemented through guidance, applications, evaluation tools, agreements, or internal processes. The final report identifies where leadership, legal, or legislative review is required.

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CONCLUSION

Florida's ILC program has reached a new stage of development. The state has established the strategic importance of ILCs and accumulated more than a decade of experience through studies, program investments, and stakeholder engagement. The Working Group builds on that foundation by moving from identifying ILC opportunities toward a clearer basis for deciding when, where, and how state participation is warranted.

The framework begins with the need or opportunity—not with a predetermined facility or funding request. It asks whether an ILC is an appropriate response, whether the project is ready and supported by credible partnerships and market evidence, whether it will produce meaningful public value, and whether the proposed level of state participation is justified. Public investment should complement, not replace, private investment, with the state's role proportionate to the public benefit, risk, maturity, and strategic importance of the investment.

This approach provides Florida with one statewide standard without requiring one statewide facility model. Regional freight markets, infrastructure conditions, economic opportunities, and development patterns can shape the investment case while maintaining consistent expectations for need, readiness, public value, accountability, and results. Clearer coordination, right-sized investment, and performance measures established before funding can help direct resources toward projects with the greatest potential to strengthen Florida's freight system and produce measurable benefits.

Ultimately, success should not be measured by the number of projects funded or dollars awarded, but by whether state participation solves meaningful freight problems, leverages private and local investment, strengthens economic competitiveness, and delivers measurable public value. The Working Group's conclusions provide a practical foundation for the next phase of Florida's ILC program—building on experience, responding to regional needs, targeting strategic investment where it matters most, and demonstrating results over time. Figure 9 summarizes these conclusions and the direction for the next phase.

Figure 9: Intermodal Logistics Center Working Group Conclusion



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SUPPORTING PACKAGE

To keep the final report concise and accessible to multiple audiences, detailed implementation tools are best carried in appendices or companion materials. The supporting package therefore includes the following tools and reference materials:

- Draft ILC application and screening materials.
- Draft evaluation criteria and scoring framework.
- Draft PTGA/agreement framework and milestone schedule.
- Statutory, administrative-rule, and policy review checklist.
- Working Group membership and meeting summaries.
- Technical Memoranda 1, 2, and 3.
- Performance metric selection guide and sample monitoring plan.