

AGENDA
CONSERVATION COLLIER
LAND ACQUISITION ADVISORY COMMITTEE

August 6, 2025, 9:00 A.M.
Growth Management Community Development
Conference Room 609/610

All interested parties are invited to attend, and to register to speak. Individuals who would like to participate in person must complete and submit a speaker form. Members of the public who would like to participate remotely should register [HERE](#) to complete the online speaker registration form. Remote participation is provided as a courtesy and is at the user's risk. The County is not responsible for technical issues. Individuals who register online will receive an email in advance of the public hearing detailing how they can participate remotely in this meeting. For additional information about the meeting, please call 239-252-2961 or email conservationcollier@colliercountyfl.gov

- 1. Roll Call**
 - A. Approval of CCLAAC members attending the meeting remotely**
- 2. Approval of Agenda**
- 3. Approval of July 2, 2025, Meeting Minutes**
- 4. Old Business**
 - A. Acquisition Updates**

Current Acquisition Status report is updated monthly in advance of CCLAAC meeting and provided as part of the meeting packet. The report is posted online under Acquisition News at: www.conservationcollier.com
- 5. New Business**
 - A. CCLAAC Review of Report from Collier Clerk titled "Review of Conservation Collier Land Acquisition Program"**
 - B. CCLAAC Review of revised Purchasing Policy as a result of Clerk's review (companion to 5.A.)**
 - C. Conservation Collier Acquisition Fund Balance (as requested by CCLAAC July 2, 2025)**
- 6. Subcommittee Reports**
 - A. Lands Evaluation & Management – Chair, Ron Clark – last meeting June 5, 2024**

Upcoming meetings needed for September & October to be discussed.
 - B. Outreach – Chair, John Courtright - last meeting April 23, 2025**
 - C. Ordinance, Policy and Rules – Chair, Michele Lenhard - last meeting December 18, 2023**
- 7. Coordinator Communications**
 - A. Miscellaneous**
 - B. BCC Items Related to Conservation Collier**
 - 1. Previously Heard**
 - a. 7/08/2025:** Pepper Ranch Volunteer Host Agreement; adopt a Resolution establishing the Proposed Millage Rates as the Maximum Property Tax Rates
 - b. 7/22/2025:** No BCC Meeting
 - 2. Upcoming**
 - a. 8/12/2025:** 2025 TPMA; May & June Active Acquisition Lists

- b. **8/26/2025:** Resolution Amending Resolution No. 2007-300 the Purchasing Policy for Conservation Coller; Agreement for Sale & Purchase Golden Land Partners, HK Investment & VanCleaf

8. **Chair and Committee Member Comments**
9. **Public Comments**
10. **Staff Comments**
11. **Next Meeting September 3, 2025**
12. **Adjourn**

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Committee Members: Please email conservationcollier@colliercountyfl.gov no later than noon Monday, August 4, 2025, if you cannot attend this meeting or if you have a conflict and will abstain from voting on an agenda topic.

Property/Project Area Name	Size (ac)	CCLAAC Recommended Ranking	CCLAAC Ranking Date	Board Ranking	Board Ranking Date
Bennett - Nancy Payton	1.00	A	6/4/2025	TBD	8/12/2025
Dabreo - Brewers Landing	2.73	A	4/2/2025	A	5/27/2025
Dr. Robert H. Gore III	12.27				
Harden	2.73	A	3/5/2025	A	5/27/2025
Rivera	2.27	A	3/5/2025	A	5/27/2025
Perez	5.00	A	4/2/2025	A	5/27/2025
Reina	2.27	A	5/7/2025	TBD	8/12/2025
Edwards Trust	65.00	A	1/8/2025	A	4/22/2025
Golden Land Partners	20.00	A	1/8/2025	A	4/22/2025
I-75/Everglades Blvd.	19.64				
Berman Trust parcel 1	5.00	A	2/5/2025	A	4/22/2025
Berman Trust parcel 2	1.59	A	2/5/2025	A	4/22/2025
Echavarria	3.05	A	2/5/2025	A	4/22/2025
Family Onyx	2.73	A	2/5/2025	A	4/22/2025
Morales	2.27	A	2/5/2025	A	4/22/2025
Tran	2.27	A	3/5/2025	A	5/27/2025
Pancham	2.73	A	5/7/2025	TBD	8/12/2025
Lucarelli	5.00	A	2/5/2025	A	4/22/2025
North Belle Meade	55.19				
D & J Investors	5.00	A	9/11/2024	A	10/22/2024
Golden Land Partners	6.25	A	9/11/2024	A	10/22/2024
Wilson	5.00	A	11/6/2024	A	1/14/2025
Simmons Trust	38.94	A	2/5/2025	A	4/22/2025
Wilcox - Panther Walk	1.59	A	3/5/2025	A	5/27/2025
Santamaria	61.10	A	4/3/2024	Property withdrawn	
Seminole Gulf Railway	15.51	A	7/2/2025	TBD	TBD
Williams Farms	1,410.00	A	4/3/2024	A	5/14/2024
A-LIST TOTAL	1,607.93				
Dively Trust	10.00	B	5/1/2024	B	6/25/2024
Parang Trust	2.73	B	10/2/2024	B	1/14/2025
B-LIST TOTAL	12.73				
B & G Landholdings	21.68	C	7/3/2024	C	10/22/2024
Bacon	0.86	C	9/11/2024	C	10/22/2024
Durr/Roemer	2.50	C	9/11/2024	C	10/22/2024
1063 Shadowlawn	1.89	C	12/4/2024	C	1/14/2025
Karlsson	0.33	C	1/8/2025	C	4/22/2025
C-LIST TOTAL	27.26				

Crystal K. Kinzel

Clerk of the Circuit Court and Comptroller
Collier County, Florida



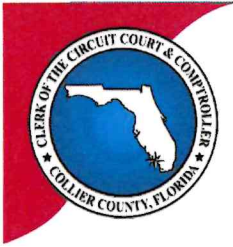
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Review of Conservation Collier Land Acquisition Program



Report No: SPC-2025-01

July 22, 2025



Crystal K. Kinzel

Collier County Clerk of the Circuit Court & Comptroller
www.collierclerk.com

OFFICE OF INSPECTOR GENERAL
3315 Tamiami Trail East, Suite 102
Naples, FL 34112-5324

July 22, 2025

Trinity Scott
Department Head
Transportation Management Services

James (Jamie) French
Department Head
Growth Management and Community Development

Subject: Review of Conservation Collier Land Acquisition Program (OIG Report No. SPC-2025-01)

Dear Ms. Scott and Mr. French:

As part of an assessment of Collier County land acquisitions, the Office of Inspector General (OIG) conducted a review aimed at evaluating the policies, procedures, and process in place to acquire land under the Conservation Collier Land Acquisition Program. Our review included evaluating appraisal costs as well as appraisal values and content to ensure Collier County taxpayers are paying a fair price for conservation parcels.

Our report identified several areas for improvement and therefore, the OIG provides thirteen (13) recommendations to the County for consideration.

This review was limited to the County's acquisition of certain parcels, as a part of a sampling. Please be advised that the OIG intends to conduct further reviews of selection and rank scoring criteria, as well as other parcels that may have additional concerns.

We appreciate the cooperation and courtesies provided to our office during the review. If you have questions, please contact me at Michael.Ryan@CollierClerk.com or (239) 252-8438.

Respectfully submitted,

Michael T. Ryan
Inspector General

Cc: Crystal Kinzel, Clerk of the Circuit Court and Comptroller
Amy Patterson, County Manager



EXECUTIVE SUMMARY

WHAT WE FOUND

WHY AND WHAT WE DID

OIG conducted a review of the Collier County Conservation Collier Land Acquisition Program (CCLAP). Our review was part of a larger project intended to review land acquired by Collier County government. The objectives of the review were to: 1) review the appraisal process for CCLAP land purchases, including appraisal content, price, and vendor contracts, and 2) determine the price paid compared to fair market values for land purchases.

OIG reviewed Conservation Collier land acquired in 2023-2025 per County financial records. Our review included examining policies, procedures, appraisal cost, and appraisal reports. Specifically, appraisal reports were reviewed for appraisal methodologies, comparatives sales, mitigation cost factors, and general content. In addition, land purchase prices were compared to available market data.

As part of the review, OIG benchmarked two other counties' policies and procedures pertaining to conservation land acquisition.

WHAT WE RECOMMEND

We issued 13 recommendations to address the County's valuation of properties under the CCLAP. In response, County management concurred with all recommendations.

The County's response to each recommendation can be found in the Recommendations section of this report. The County's formal response is provided in Appendix A of this report.

The Conservation Collier Land Acquisition Program (CCLAP) purchasing policy under County Resolution 2023-10 does not require mitigation cost factoring in the offer. Development of wetlands would typically cost at least \$30,000 for low quality wetland parcels—92 percent of properties reviewed included wetlands. Additionally, in one sample reviewed, a wildlife mitigation costs varied between two appraisals by 46 percent—a difference of over \$766,000.

OIG found use of County-owned property as comparative sales—in one case, the actual subject property. Use of County-owned properties can affect market evaluation and cause the County to risk setting the price for future similar purchases. Two reviewed appraisals included out-of-county properties or properties with zoning differences. The absence or variances of adjustments for either physical location or zoning may impact property value calculations. Furthermore, use of market adjustments varied in appraisals—potentially increasing the risk of unreliable appraisal values for the County.

In addition, the County requires using the average of the two appraisals as the appraised value rather than the lowest value—in OIG's sampling of 26 properties, use of the lowest appraisal value as a basis for offers may have resulted in a potential savings of more than \$272,000 in County funds. Additionally, the County entered at least one agreement in which the full appraisal price must be paid, per the agreement terms.

In our sampling, OIG discovered at least three instances in which the County paid higher than the landowner's estimated appraisal value or above the listed sales price—such as one Marco Island property purchased for \$420,000 over the applicant's estimated value, and a Panther Walk Preserve property for more than \$50,000 above.

Calculation errors, along with incorrect comparable sales references, were found in appraisal information yet County staff accepted the information.

In some instances, County staff did not reevaluate appraisal values for any market changes for appraisals exceeding one year. As a result, the risk of inaccurate appraisal values may increase with any market fluctuations that occur over time compared to the effective appraisal date.

Lastly, Resolution 2023-10 does not require the County to have written procedures regarding the appraisal process. By establishing detailed procedures and appraisals review standards, County staff will be better positioned to save taxpayer funds in Conservation Collier land purchases.

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OBJECTIVES, SCOPE, AND METHODOLOGY

OBJECTIVES AND SCOPE

The Collier County Clerk of the Circuit Court and Comptroller, Office of Inspector General (OIG) conducted a review of the Conservation Collier Land Acquisition Program (CCLAP). The objectives of our review were to: 1) review the appraisal process for CCLAP land purchases, including appraisal content, price, and vendor contracts, and 2) determine the price paid compared to fair market values for land purchases.

The scope of the review covered CCLAP land acquired from October 1, 2023, through March 30, 2025.

METHODOLOGY

In performing this review, OIG reviewed the County's appraisal process with the Transportation Management Services Department's Real Property Management (formerly, Real Estate Property Division), to include conducting an analysis on the appraisal content for land purchases. This analysis included a sampling of 26 properties that the County purchased for nearly \$8 million. In addition, we reviewed appraisal service contracts and completed a comparative analysis of CCLAP appraisals against the County Property Appraiser's Office assessments, along with a comparative analysis of the land purchase prices against real estate market conditions at the time purchased. Lastly, we benchmarked land purchase process best practices of two other Florida counties and conducted interviews.

This review was conducted in accordance with the Association of Inspectors General's *Principles and Standards for Offices of Inspector General*.

BACKGROUND

CCLAP is one of the primary programs administrated by Collier County operations that regularly purchases land. The Conservation Collier mission is to acquire, preserve, restore, and maintain vital and significant threatened natural lands, forest, upland, and wetland communities located in Collier County, for the benefit of present and future generations.

Since 2003, Conservation Collier has been acquiring properties throughout Collier County from willing sellers. Properties acquired must meet specific criteria including rare habitat, aquifer recharge, flood control, water quality protection, and listed species habitat. At the program's inception, the Collier County Board of County Commissioners (BCC), appointed a Conservation Collier Land Acquisition Advisory Committee (CCLAAC) to consider and make recommendations on offered properties. The CCLAAC's recommendations have resulted in BCC approval for and acquisition of locations throughout Collier County.

The Collier County Growth Management and Community Development Department's Review Division (herein, referred to as Conservation Collier staff) and the Transportation Management Services Department's Real Property Management (RPM) coordinate efforts to make these acquisitions possible. Financial records indicate that Conservation Collier paid \$3.9 million in 2023, and \$8 million for land purchases in 2024.

OPPORTUNITIES FOR IMPROVEMENT

Policies are guiding principles in how business is intended to be conducted. The CCLAP's implementation is guided by the policies established under Collier County Ordinance 2024-17. This ordinance provides policy and high-level procedures to carry out the initiatives of the program.

A purchasing policy is established under Collier County Board Resolution 2023-10. This policy provides guidelines for the methodology in obtaining appraisals, establishes a requirement for an appraisal review by RPM, and sets time limits for appraisal validity when offers are extended to landowners.

OIG reviewed both the ordinance and resolution for appropriate content, accuracy, clarity and completeness. In addition, the ordinance and resolution served as criteria in performing our review of 2023-2025 CCLAP land acquisitions. During the review of appraisals, OIG found that the CCLAP purchasing policy requires revisions related to the following areas to strengthen the County's decision-making process on purchase offers:

1. Mitigation costs,
2. County-purchased properties used for comparable sales,
3. Comparable sale adjustments, and
4. Average appraisal values.

Finding 1: Mitigation Costs Are Not Completely Factored into County Offers

OIG found that mitigation costs are not completely factored into the County's decision-making process when making land purchase offers.

WETLANDS

OIG found that the County's purchasing policy requires staff to use the appraisal value to provide an offer to the landowner; however, the appraisal value does not always incorporate wetland development mitigation costs due to the methodology, i.e., sale approach methodology, being used.

OIG noted 23 out of 26 samples (92 percent) included wetlands, which are protected by federal law, on the parcel. The Federal "Clean Water Act" Section 404 ensures there is no net loss of wetland functions.¹ To accommodate times where wetland functions must be impacted, the State of Florida allows for wetland mitigation to balance the functional losses and gains to wetlands.² When a developer will impact wetlands, they are required to obtain a Uniform Mitigation Assessment Method assessment to determine the quality of wetlands to be impacted. Based on the assessment, wetlands are rated low, average, or high quality. According

¹ The U.S. Army Corps of Engineers and U.S. Environmental Protection Agency define "wetlands" as "areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." [How Wetlands are Defined and Identified under CWA Section 404 | US EPA](#).

² According to the Florida Department of Environmental Protection, "wetlands mitigation" is defined as – "A wetland enhancement, restoration, creation and/or preservation project that serves to offset unavoidable wetland impacts is known as wetland mitigation or compensatory mitigation. The ecological benefits of a mitigation project should compensate for the functional loss resulting from the permitted wetland impact."

to Conservation Collier staff, mitigation credits must be obtained for the wetland impacts, and the costs range from \$30,000 to over \$400,000:

Quality Rating	Mitigation Credit Cost
Low	\$30,000-50,000
Average	\$80,000-100,000
High	\$400,000 or higher

Since the purpose in acquiring these parcels of land is conservation, the County typically is not required to pay these mitigation credits; however, that would not apply to anyone purchasing the land for development.

As an example, OIG determined that 4 of our 26 samples were related to Panther Walk properties, which are mainly hydric mapped soils.³ Given that the nature of hydric soils is that the area is under water for at least a portion of the year, mitigation costs to develop such properties may likely be higher.

Therefore, it may be in the best interest of Collier County taxpayers for the County to factor these costs into the offer presented to the landowner.⁴

WILDLIFE

OIG found examples in which wildlife mitigation costs were factored into the appraisal process; however, variances existed. For example —

Marco Island Preserve – Annecy Marco Property (Parcel ID: 5719904005) Purchase (Sample 5)

There is a 46 percent variation regarding the mitigation costs for wildlife between the two appraisal reports.

One appraiser reported an eagle’s nest on the property and made a minus 15 percent adjustment for the absence of an eagle’s nest on all comparable property sales. This adjustment calculated out to be an average of \$284,343 in sales price reduction on each comparable property. In addition, due to the presence of tortoises, a minus 20 percent adjustment was made for the lack of tortoise presence on any comparable property. This adjustment calculated to an average of \$379,124 in sales price reduction on each property, which contrasted the appraiser’s narrative explanation, estimating \$770,000 total cost to remove the tortoises.

In the second appraisal report (23-64), the appraisal report cited an estimated cost of \$1,429,968 to relocate all the tortoises on the subject site.

Appraisal Report	Eagle	Tortoise	Total
Report 6280-TS	\$284,343	\$379,124	\$663,467
Report 23-64	\$0	\$1,429,968	\$1,429,968
TOTAL WILDLIFE MITIGATION COST DIFFERENCE			\$766,501 (46%)

³ According to the United States Department of Agriculture, Natural Resources Conservation Service, a hydric soil is a soil that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part. See [Hydric Soils | Natural Resources Conservation Service](#) (last visited April 28, 2025).

⁴ OIG cannot provide actual remediation cost dollars, as the County would need to conduct a mitigation cost survey, i.e., Uniform Mitigation Assessment Method, of properties to determine the required expenditures.

Marco Island Preserve – South Terra Corp Property (Parcel ID: 58105440009) Purchase (Sample 21)

There is a 63 percent variation regarding the mitigation costs for wildlife between the two appraisal reports.

One appraisal report (23-165) deducted \$140,000 for the removal of 15 tortoises (\$6,600 per tortoise) although 30 tortoises were documented in the Conservation Collier Initial Criteria Screening report provided to the appraiser.

In the second appraisal report (2023-091), the appraisal report made a 10 percent downward adjustment on comparative sales 2-6 to account for 30 gopher tortoises. This adjustment calculated to an average of \$228,795 in sales price reduction on each comparative sale. Although comparative sale 1 had gopher tortoises, no adjustment was made. However, the property listed an estimated removal cost of \$300,000.

Appraisal Report	Tortoise
Report 2023-091	\$228,795
Report 23-165	\$140,000
TOTAL WILDLIFE MITIGATION COST DIFFERENCE	\$88,795 (63%)

Although the sales approach methodology is cited as the most appropriate approach for a vacant lot, it does not factor the mitigation costs for developing wetlands or wildlife removal. As a result, these mitigation costs are not fully considered in the County's purchase offer and could potentially result in paying a higher price compared to other buyers.

OIG recommends that —

Recommendation 1: The County's Real Property Management factor mitigation costs into the County's decision-making process for purchasing land parcels as part of the Conservation Collier Land Acquisition Program.

Finding 2: Appraisals Include County-Owned Properties as Comparable Sales

During the review, OIG noted that 2 out of 26 samples contained a total of three comparable sales relating to County-owned properties.

Pepper Ranch Preserve – English Trust Property (Parcel ID: 00053560005) Purchase (Sample 6)

The appraiser used two Collier County pending sales properties as comparative sales:

Comparative Sale	Description	Sale Date	Amount
3	Parcel ID: 00053815006 Location: Trafford Oaks Road, Immokalee, FL 34142 Total Area: 24.50 acres	Pending	\$220,000
4	Parcel ID: 00053440002, 00053813008, & 00053805003 Location: Trafford Oaks Road, Immokalee, FL 34142 Total Area: 59.79 acres	Pending	\$505,000

The unit value was calculated based on the average adjusted sales prices of comparative sales 3-5, including the two Collier County pending sales noted above, which impacted the final sales estimate of \$8,443 per acre.

Shell Island Preserve – Dredge Management Property (Parcel ID: 742040001) Purchase (Sample 9)

One of the two appraisers used two prior Collier County land purchases as comparative sales, one of which was the same property parcel as the subject property:

Comparative Sale	Description	Sale Date	Amount
1	Parcel ID: 00766160006, 00766080005, 00764400001, 00766120004, 00760040009, and 00767200004 Location: Tamiami Trail East, Naples, FL 34114 Total Area: 26.99 acres	8/11/22	\$1,850,000
3	Parcel ID: 742040001 (Subject of Appraisal) Location: Collier Blvd & Port Au Prince Dr Total Area: 18.73 acres	2/3/22	\$1,500,000

This appraiser’s final estimated value was based solely on comparative sale three – the actual subject property of the appraisal.

The current purchasing policy does not provide comparative sales use parameters as part of the CCLAP appraisal process. In benchmarking other counties, OIG discovered that as part of the appraisal process, Lee County does not compare other land owned by the County in order to evaluate the outside real estate market on similar properties. Problems associated with using county-owned land may include the county government setting the price and inadvertently increasing the price on itself.

Under the Collier County purchasing policy, disallowing the use of County-purchased property is not a current requirement provided to third-party appraisers, as part of the CCLAP appraisal process.

As a result, appraisal values may be skewed when Collier County property purchases are used as comparative sales, since they are not reflective of what other buyers would pay for the same type of land.

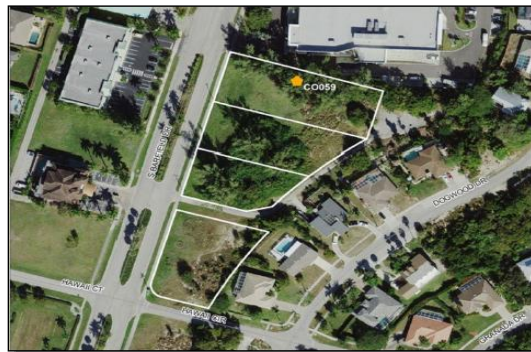
OIG recommends that —

Recommendation 2: The County’s Real Property Management establish appraisal standards disallowing the use of Collier County-purchased properties as comparable sales to ensure effective evaluation of the market and mitigate the risk of setting the price for future purchases.

Finding 3: Market Adjustments for Comparable Sales Varied in Appraisals

OIG found that the use of market adjustments varied in appraisals. Overall, market adjustments made to comparative sales ranged from 0.2 percent to 21 percent. As an example —

Marco Island Preserve – Annecy Marco Property (Parcel ID: 5719904005) Purchase (Sample 5)



On December 6, 2023, the County paid \$3,140,000 for the Annecy Marco Property. This property was vacant commercial land that combined four parcels—5719904005 (the subject property), 57199000003 (191 S. Barfield), 57198960005 (201 N. Barfield) and 57198920003 (221 S. Barfield)—for a combined area of 2.13 gross acres. According to one report, there was a lack of feasibility of this property as a commercial venture.

One appraisal report, which was issued to the County on March 2, 2023, estimated the property value at \$2,880,000. Some of the comparative sales were deemed “superior” properties based on location and condition without adjustment.

In reviewing the two third-party appraisal reports for this property, it was determined that one appraiser made no adjustments for comparative sales from 2022. Conversely, the other appraiser made market change adjustments of +4.7 to +5.3 percent on every 2022 comparative sale listed in the 2023 appraisal report. Per the appraiser’s report, this adjustment was due to the lack of available commercial property on Marco Island at that time.

Comparable sales used in appraisals are evaluated by appraisers to determine the appraisal value of the subject property. The appraiser may use market adjustments to sale prices to ensure similarity to the property being appraised.

Inconsistencies in market adjustments used by appraisers increases the risk of unreliable appraisal values.

OIG recommends that —

Recommendation 3: The County’s Real Property Management staff proactively address high variances in appraisal adjustments with third-party appraisers to enhance the County’s appraisal review process and its assessment of reasonable sales offers.

Finding 4: Out-of-County Comparative Sales and Zoning Affect Appraisal Values

In 2 out of 26 properties reviewed, OIG found that the comparable sales an indication of value for properties out-of-county did not have any adjustments to account for physical location. For example —

Pepper Ranch Preserve – English Trust Property (Parcel ID: 53560005) Purchase (Sample 6)

In acquiring the English Trust property, which is 59 acres located in Immokalee, OIG noted that appraisers were utilizing comparative sales that were distant from the parcel being acquired. In the appraisal report, the appraiser used one comparative sale from outside of Collier County that was used in calculating the final estimated appraisal value:

Comparative	Location	County	Distance
5	Labelle	Hendry	22.1 miles

The use of out-of-county property did not have any adjustments to account for physical location.

Conversely, the second appraiser used comparable sales from Naples—all of which were considerably smaller properties.

Comparative	Location	Zip Code
1	Naples – Golden Gate	34117
2	Naples – Golden Gate	34117
3	Naples – North of Immokalee Road	34120
4	Naples – North of Immokalee Road	34120

The first two comparable sales were adjusted upward by 10 percent for location, whereas the other two comparative sales were both adjusted downward by 25 percent for location. According to Collier County Property Appraiser (CCPA) records, the 2022-2023 sales for parcels over 50 acres in these zip code locations and excluding Collier County purchases averaged \$35,920 per acre, which indicates all comparative sales should have been adjusted downward.

OIG reviewed 2022-2024 sales prices for the same section, township, range, and use code as the English Trust property and noted that the overall price paid per acre by other landowners was \$6,651, which is \$1,203 per acre lower than the \$7,854 per acre that the County paid in 2024.

Shell Island Preserve – Dredge Management Property (Parcel ID: 00742040001) Purchase (Sample 9)

OIG noted that one appraiser used comparative sales that were both distant and located in another county from the parcel being acquired. However, no adjustments were made for out- of-county sales comparatives.

Comparative	Location	County	Distance
2	Bonita Springs	Lee	25 miles
4	Estero	Lee	36 miles

In addition to location adjustments, OIG noted that the zoning of the subject property did not match the zoning of three comparative properties. In those instances, no adjustment was made to account for the different zones.

OIG reviewed 2022-2024 sales prices for the same section, township, range, and use code as the Shell Island Preserve property and noted that only one sale had occurred. In 2023, a landowner paid \$76,964 per acre for property in that area, whereas in January 2024, the County paid \$80,772 per acre—**\$3,808 more per acre**.

Although zoning is currently reviewed as part of the property appraisal, the County’s purchasing policy does not identify any zoning criteria for comparable sales as part of the CCLAP appraisal process. Furthermore, differences existed in how zoning adjustments were determined; therefore, property values may not be accurately calculated without taking into consideration the comparable properties in different zones.

OIG recommends that —

Recommendation 4: County management, in coordination with key stakeholders and staff, propose County purchasing policy (as described in Collier County Resolution 2023-10) revisions to the Board of County Commissioners to update guidelines regarding location and zoning into the Conservation Collier Land Acquisition Program’s purchasing process.

Finding 5: Average Appraisal Value Requirement Increased Purchase Cost

Section 125.355 of the Florida Statutes requires obtaining two appraisals for property purchase amounts over \$500,000. However, there is not a statutory requirement that precludes the County from offering less than the appraised value on any conservation land purchase. According to the offer methodology prescribed in the County’s purchasing policy, “the appraised value will be equal to the average of the two appraisals.”

Using the average of the two appraisals to be “*the appraised value*” requires County staff to negotiate offers from a higher appraised value than what could otherwise be used and impacts both mass appraisals and high-value property purchases.

MASS APPRAISALS

In our sampling review of 26 CCLAP property purchases, OIG found that mass average appraisals were obtained in 13 out of the 26 purchases. This type of mass average appraisal was commonly used in the Robert Gore Preserve, Winchester Preserve, and Panther Preserve areas, where the parcels are primarily similar. Since multiple parcels are purchased using the appraisal value, two appraisals were obtained for each preserve.

Panther Walk Preserve – Fish Property (Parcel ID: 39150520003) Purchase (Sample 26)

As an example, there were two third-party market study appraisals completed for the Panther Walk Preserve, which were issued in July 2024. The appraisers used a combined total of 14 comparative sales to determine a value of parcels with an acreage of 1.14-2.73 acres and containing between 75 percent to 100 percent wetlands. Ten out of 14 comparative sales had market adjustments between +0.1 to +5.9 percent. Both appraisers used the “Hughes” property as a sales comparative.

The Hughes property (PID 39151680007) was a 1.59 acreage comparative sale with a listed sale price of \$54,900, dated July 10, 2024. One appraisal report referenced that the property listing contained a comment that it was a “firm price as the county will buy the lot in the near future.”⁵

The property was originally part of a September 2023 mass average appraisal in which one appraiser estimated at \$28,000 per acre and the other appraiser estimated \$30,000 per acre. Per the County’s purchasing policy, an average of the two appraisals was required to determine the appraised value. Therefore, County staff calculated an appraised value of \$29,000 per acre. Had staff been allowed to accept the lower of the two appraisal amounts, the County would have saved \$1,000 per acre or \$1,590 total for the 1.59-acre property.

In July 2024, the BCC approved the purchase of the Hughes property at a price of \$46,110. However, the deed was not transferred or payment made, until September 2024. Both appraisers used the Hughes property as a July 2024 comparative sale (when the sale was pending) with a price of \$54,900, referencing the realty company as the source of sale verification. Consequently, the incorrect sale price (\$54,900) inflated the actual sale price (\$46,110) by approximately 19 percent, or \$8,800, for comparative sales purposes.

OIG also noted that the subsequent 2024 mass appraisal value of \$32,000 was 10 percent higher than the 2023 appraisal value of \$29,000 per acre, even though one appraiser only suggested a +5.9 percent annual increase for 2024 market adjustments, and the second appraiser made no market adjustments.

In addition, if the appraisal value is too high, the County may overpay for all parcels in the multi-project parcel area. This averaging of the appraisal values can be problematic in areas such as Panther Walk Preserve due to an existing memorandum of understanding between the County and Florida Wildlife Corridor Foundation, which requires the County to offer 100 percent of the appraised value to be reimbursed 50 percent for land purchases.

HIGH-VALUE PROPERTIES

As an example, the table below shows that on two property purchases listed, more than \$272,000 in County funds could have potentially been saved, if policy allowed the use of the lowest appraisal value.

⁵ This point was raised by a County Commissioner during a BCC meeting held on February 11, 2025.

Sample No.	Property and PID	Appraisal Average	Cost Paid	Lowest Appraisal Value	Cost Difference Using Lower Amount
5	ANNECY MARCO PROPERTY; PID 57199040005 combined with 57199000003, 57198960005, and 57198920003	\$ 3,140,000	\$ 3,140,000	\$ 2,880,000	\$ 260,000
9	DREDGE MANAGEMENT PROPERTY; PID 742040001	\$1,592,500	\$ 1,512,875	\$ 1,500,000	\$ 12,875
Potential Taxpayer Cost Savings					\$ 272,875

The current County purchasing policy requires that an average of the estimated appraised values is used as the appraised value.⁶ This requirement can lead to a higher payment amount than would otherwise be paid if using the lowest appraisal value.

OIG recommends that —

Recommendation 5: County management request a revision to the County purchasing policy (Collier County Resolution 2023-10) to allow Real Property Management staff to use the lower appraisal value as the appraised value for price negotiations.

Finding 6: County Purchases Sometimes Exceeded Landowner Value Estimates or List Price

OIG found that in certain instances, the County paid either above the landowner’s estimated property value at the time of submitting the CCLAP application or the listed sales price. For example —

Marco Island Preserve – South Terra Corp. Property (Parcel ID: 58105440009) Purchase (Sample 21)

The landowner applied to the CCLAP on April 18, 2022. The application indicated an appraisal value estimate of \$1,200,000. On December 6, 2023, the County closed on the South Terra Corp. property at \$1,620,000—**\$420,000 above the stated application estimated value.**

Panther Walk Preserve – Hackman Property (Parcel ID: 39150600004) Purchase (Sample 25)

The landowner applied to the CCLAP on July 12, 2021. The application indicated an appraisal value of \$12,236 for the 2.5-acre parcel. On December 15, 2023, the County closed on the Hackman property at \$63,000—**\$50,764 above the stated application appraisal value.**

Panther Walk Preserve – McGinnis Property (Parcel ID: 39150600004) Purchase (Sample 1)

According to one publicly available online listing source, the property was listed for \$38,000 in 2023, when the County purchased it for \$42,800—**\$4,800 above the listed price.** The 2023 listing price was reduced from \$56,000 in 2022 and was on the market for 1,091 days. Upon discussing the issue with RPM, OIG discovered

⁶ According to Resolution 2023-10 Purchasing Policy, when the estimated value of a property is over \$500,000, two appraisals are required. It states, “The appraised value will be equal to the average of the two appraisals.” Conservation Collier staff are allowed to determine the offer amount, but they cannot exceed the appraised value.

that staff were not aware of the property listing. Checking for current property listings as part of the County's review process can help mitigate the potential risk of paying above list price for properties.

In reviewing the process, OIG determined that the County does not have procedures to address these factors as part of the overall land acquisition process, which can impact the County's decision-making on negotiating an offer price. In addition, RPM staff voiced concerns over limited access to market tools and applications, such as Multiple Listing Service or other available commercial real estate information, to compare and analyze market data.

OIG recommends that —

Recommendation 6: The County's Real Property Management evaluate landowner value estimates and existing listing prices as part of the County's decision-making process in determining price negotiations and sales offers to mitigate potential financial risks.

Recommendation 7: The County's Real Property Management use real estate market tools and applications to obtain current market information prior to proceeding with County land purchase offers.

Finding 7: County Staff Accepted Appraisal Information Containing Errors

During the review, OIG found errors, including calculation and date errors, as well as incorrect comparable sales references, in some of the appraisal information provided to the County. As an example —

Marco Island Preserve – Annecy Marco Property (Parcel ID: 57199040005) Purchase (Sample 5)

One appraiser concluded a final sales estimate of \$30.41 per square foot based on weighting the sales comparatives. OIG recalculated the weighted sales comparatives and determined a weighted average of \$29.87 per square foot, which was \$0.54 lower than the appraiser's calculation. The price difference would mean the final appraisal value was \$50,194 too high (92,952 square feet X \$0.54).

Panther Walk Preserve – Fish Property (Parcel ID: 39150520003) Purchase (Sample 26)

One appraiser had mathematical errors on every sales comparative when calculating the sales price per acre. The errors caused further miscalculations in the appraisal leading to an overall average variance of \$15 per adjusted acre unit price.

Uniform Standards of Professional Appraisal Practice (USPAP) Standards Rule 1-1, General Development Requirements, states: "In developing a real property appraisal, an appraiser must: (c) not render appraisal services in a careless or negligent manner, such as by making a series of errors that, although individually might not significantly affect the results of an appraisal, in the aggregate affects the credibility of those results."

Although these errors did not significantly change the existing appraisal values, RPM staff accepted the reports. Accepting appraisals without validating appraisal content and calculations could impact price negotiations with landowners.

OIG recommends that —

Recommendation 8: The County's Real Property Management implement a formal internal review process including checking and verifying appraisal information to ensure accuracy of data and enhance its due diligence.

Finding 8: County Staff Did Not Reevaluate Appraisal Values for Market Changes

OIG found that in some instances, County staff did not reevaluate the appraisal values for any changes in current market conditions, despite the time lapse between the appraisal and the date of either the County's final purchase offer or sales closing.⁷

APPRAISAL VALUE TIMING IN OFFERS

When reviewing the timeline between the appraisal report and closing on the property, OIG noticed a trend of higher-than-average process delays—exceeding the County's 2.5-month average time—in making an offer to landowners for purchases relating to multi-parcel appraisals. Specifically, OIG noted 4 out of 26 samples within multi-parcel appraisals used the same appraisal and had offers that were over one year from the appraisal value effective dates. As one example —

Robert Gore Preserve – Kleinberger Property (Parcel ID: 41500480008) Purchase (Sample 10)

Conservation Collier staff could not locate the application for the 2.73-acre Kleinberger property. Based on an August 23, 2022, appraisal report, the property appraised value was \$60,060, effective August 1, 2022. The appraisal report prescribed a marketing period of 12 months, which would make this appraisal value effective through August 1, 2023.⁸

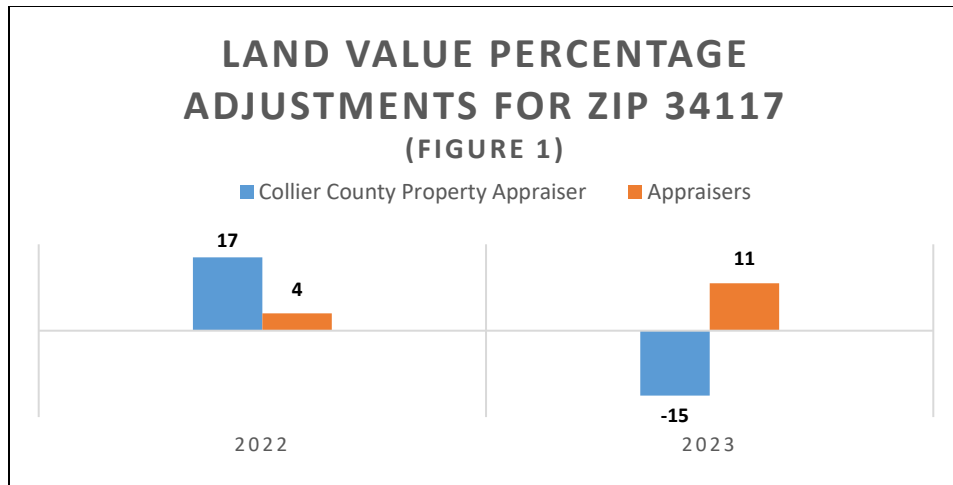
On September 23, 2022, RPM staff presented the initial offer of \$110,000 for a combination of two parcels (PID 41500440006 and 41500480008). Per the Conservation Collier Project Design Report, RPM issued a second offer of \$104,500 on October 26, 2023. This date exceeded the market value effective period by 1 year 2 months and 25 days.

In reviewing the corresponding appraisal, the appraiser used comparative sales from 2021 and made an overall market adjustment increase of four percent to reflect the 2022 market.

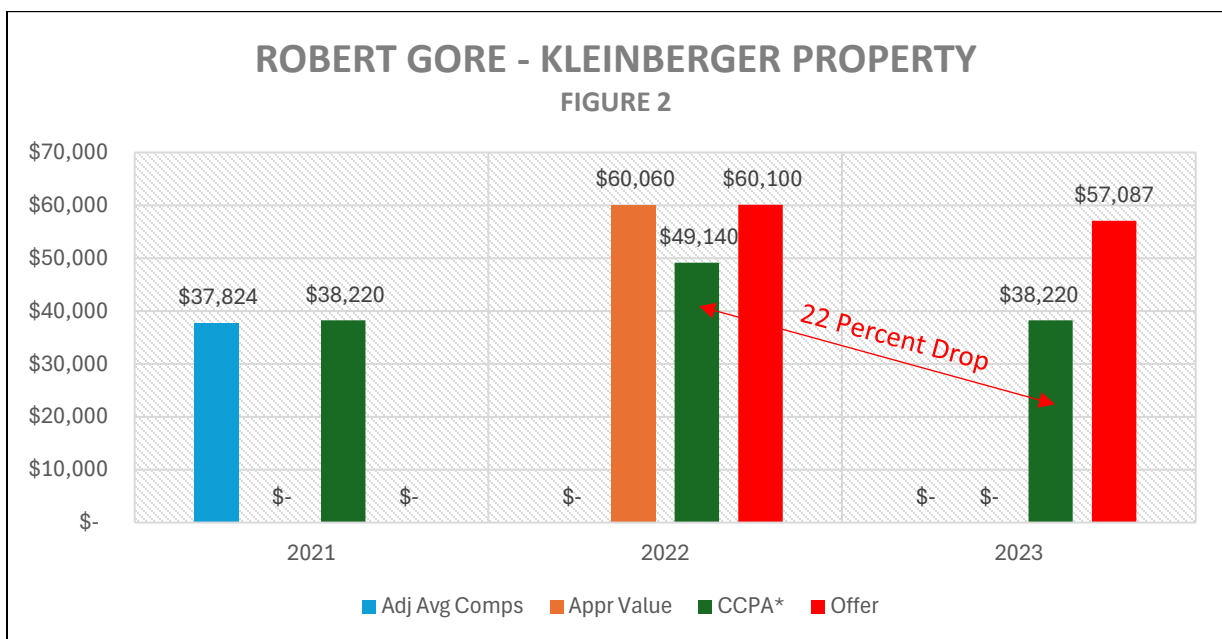
OIG reviewed all assessed property values for our samples within the same zip code (34117) for 2022-2024 appraisals and noted that the appraisers' land value percentage adjustments increased, whereas CCPA percentage adjustments decreased during this period (see **Figure 1**).

⁷ Appraisers commonly listed the market value period as 6-12 months.

⁸ The appraisal report defines "Marketing Time" as "an opinion of the amount of time it might take to sell a real or personal property interest at the concluded market value level during the period immediately after the effective date of an appraisal."



According to the CCPA, assessed land property values in the same area declined overall 15 percent in 2023; however, the offer for the Kleinberger parcel was only decreased by five percent. In addition, the CCPA property value dropped 22 percent between 2022 and 2023 (see Figure 2).



If the Kleinberger property offer had been lowered by at least the overall CCPA 15 percent market drop reflected in the area, it would have potentially saved County taxpayers \$9,015.

The purchase was presented to the BCC on January 9, 2024, and the property sale closed for \$104,500 on March 15, 2024.

APPRAISAL VALUE TIMING IN CLOSING

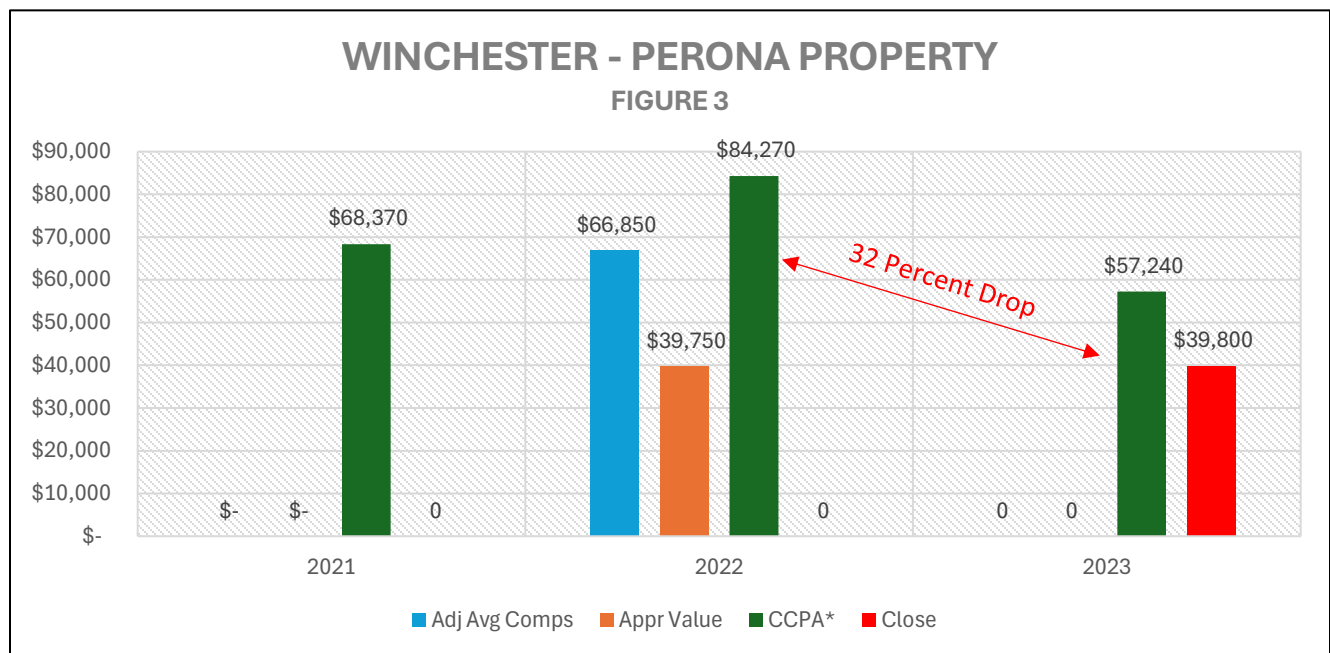
In addition, OIG noted that appraisal values were more than one year old from the appraisal market value date at sales closing. This timing difference often made the estimated price higher than current market values,

especially by the time the property closed. As an example, OIG examined three properties associated with the Winchester Head Preserve.

Winchester Head Preserve – Perona Property (Parcel ID: 39957360000) Purchase (Sample 16)

Conservation Collier staff could not locate the application for the 1.59-acre Perona property. Based on an August 20, 2022, appraisal report, the property appraised value was \$39,750, effective August 13, 2022. On September 22, 2022, RPM staff presented the initial offer of \$39,800. Per the BCC agenda Executive Summary report, the County offer was accepted on June 22, 2023. *(The accepted offer exceeded the 30-day acceptance period documented in the offer letter by eight months.)*

The purchase was presented to the BCC on September 12, 2023. On November 7, 2023, the County closed on the Perona property at \$39,800. *(By the time of closing, the appraisal value was 1 year 2 months and 25 days past the effective date of the appraisal.)* There have been no sales of the property since at least 1973; however, the CCPA listed a 2024 assessed value of \$57,240.



* CCPA values were adjusted one year to reflect prior year data collected for tax assessments.

In the Winchester Preserve samples reviewed, the same appraisal report was used for the purchase of each parcel. The comparative sales used in the appraisal were from 2022. The appraiser made an overall market adjustment increase of two percent to reflect the 2022 market. According to the CCPA, assessed property values in the same area for the four Winchester Preserve samples declined by 32 percent in 2023 (**see Figure 3**); however, no offers were decreased. If the 2022 offer for the Perona property had had been lowered by the 32 percent drop before the closing, it could have potentially saved taxpayers \$12,736.

Winchester Head Preserve – Wilson Trust Property (Parcel ID: 39959560002) Purchase (Sample 19)

Conservation Collier staff could not locate the application for the 1.59-acre Wilson Trust property. Based on an August 20, 2022, appraisal report, the property appraised value was \$39,750 effective August 13, 2022. On September 22, 2022, RPM staff presented the initial offer of \$39,800.

Per the Conservation Collier Project Design report, a second offer was issued on April 11, 2023; however, staff could not locate the second offer letter.⁹ Per the BCC agenda Executive Summary report, the offer was accepted on April 28, 2023.

The purchase was presented to the BCC on October 10, 2023. On November 20, 2023, the County closed the Wilson property at \$39,800. *(By the time of closing, the appraisal value was 1 year 3 months and 7 days past the effective date of the appraisal).* The property had been owned by the Wilson family since 1977. The CCPA listed a 2024 assessed value of \$57,240. If the 2023 offer had been lowered by the 32 percent drop before the closing, it could have potentially saved taxpayers \$12,736.

Winchester Head Preserve – Mooney & Haskins Property (Parcel ID: 39953720000) Purchase (Sample 18)

Conservation Collier staff could not locate the application for the 1.59-acre Mooney & Haskins property. Based on an August 20, 2022, appraisal report, the property appraised value was \$39,750 effective August 13, 2022. On September 22, 2022, RPM staff presented the initial offer of \$39,800. Per the Conservation Collier Project Design report, a second offer was issued on May 15, 2023; however, Conservation Collier staff could not locate the second offer letter.¹⁰ According to the BCC agenda Executive Summary report, the offer was accepted on May 15, 2023. The purchase agreement was dated September 12, 2023.

The purchase was presented to the BCC on November 14, 2023. On February 16, 2024, the County closed the Wilson property at \$39,800. *(By the time of closing, the appraisal value was 1 year 6 months and 3 days past the effective date of the appraisal.)* Previous sale information was not available on the CCPA website due to confidentiality; however, the CCPA listed a 2024 assessed of \$57,240. If the 2023 offer had been lowered by the 32 percent drop before the 2024 closing, it could have potentially saved taxpayers \$12,736.

Although the County does not have a policy governing a time requirement for appraisal values, OIG used the maximum period of 12 months, which is based upon marketing period provided by appraisers. The root cause of the issue in the samples above is primarily due to offer renegotiations due to policy changes.

As a result, the risk of inaccurate appraisal values may increase with any market fluctuations that occur over time compared to the effective appraisal date.

OIG recommends that —

Recommendation 9: The County's Real Property Management evaluate internal controls to ensure offer acceptances do not exceed the 30-day acceptance period, as stipulated in the County's offer letter and policy.

Recommendation 10: The County's Real Property Management evaluate their use of appraisal values exceeding one year of the appraisal effective date and consider obtaining new comparative sales or establishing time limits for sales closure to ensure property appraisal values remain relevant to any market adjustments.

Recommendation 11: Conservation Collier staff review existing property purchase records and records management procedures to ensure compliance with the records requirements set forth in Title XI, Section 125.355 of the Florida Statutes.

⁹ Per Florida Statutes, Title XI, § 125.355, "The county shall maintain complete and accurate records of every such appraisal, offer, and counteroffer."

¹⁰ Ibid.

Finding 9: County Lacks Written Procedures for Land Acquisition

In reviewing RPM processes, OIG requested procedures from RPM staff; however, officials advised that written procedures did not exist.

A procedure is a description of the operational processes necessary to implement policy. A properly developed and approved procedure ensures that policy is implemented efficiently and applied consistently. Many of the procedures used by Conservation Collier staff are outlined in the ordinances. In addition, staff uses a 'Conservation Collier Program Manual', and high-level property review procedures established at a January 2024 BCC meeting.

OIG found that the County's purchasing policy does not require Conservation Collier staff to have written procedures regarding the review of third-party appraisals, price negotiations, and sales closing. The lack of procedures can allow for due diligence gaps or inconsistencies in carrying out directives prescribed by County ordinances.

In discussing the purchasing policy with County officials, OIG noted that some key stakeholders in the process were not afforded an opportunity to provide feedback regarding the resolution draft prior to its establishment. Without identifying and incorporating all the key stakeholders, there is a potential for inadvertent gaps in policy design and content.

OIG recommends that —

Recommendation 12: County management, in coordination with key stakeholders and staff, propose County purchasing policy (as described in Collier County Resolution 2023-10) revisions to the Board of County Commissioners to require written procedures regarding third-party appraisals for any County land purchases.

Recommendation 13: The County's Real Property Management establish formal written procedures for land purchases including appraisal reviews, price negotiations, and closings to ensure maximized savings to Collier County taxpayers.

OBSERVATIONS

Costs for appraisals range from \$33 to \$2,800 and are disclosed to the public in the Executive Summary reports provided by Conservation Collier staff in BCC meeting agenda packets. Different cost strategies are utilized by Conservation Collier to keep costs low for county taxpayers. For example, Conservation Collier paid \$675 for a single 1.14-acre parcel appraisal in the Robert Gore Preserve in 2023; however, a parcel with the same 1.14 acreage in the same preserve only cost \$33 in 2024, when combined into Conservation Collier's cost of obtaining two mass appraisals for a multi-parcel project. In this example, the County's use of a mass appraisal cost strategy resulted in a cost savings of \$642 per parcel.

CONCLUSION

Based on OIG's analysis of the 26 sampled property purchases, the County's implementation of measures to address the report findings may have resulted in a potential overall savings of over \$815,000 in County funds. This amount represents potential cost savings that may have occurred if staff reviewed appraisal calculations

for accuracy and were allowed to use the lower appraisal amount, the sales listing price, or landowner estimates. Additional cost savings may be gained by addressing other areas identified in this report.

# Transactions Reviewed	Total Value of Transactions	Potential County Savings
26	\$7,975,456	\$815,923

RECOMMENDATIONS

OIG provided a draft of this report to County management for review and comment on the findings and recommendations. The following recommendations were issued. The County provided the following management response(s). The County's full response is provided in Appendix A.

OIG recommends that —

Recommendation 1: The County's Real Property Management factor mitigation costs into the County's decision-making process for purchasing land parcels as part of the Conservation Collier Land Acquisition Program.

Management Response: Concurred – Mitigation costs are already accounted for in the County's land acquisition process, as they are inherently reflected in the appraised value of a property using the sales comparison approach. This method captures market-based factors, including any known or anticipated mitigation obligations, which in turn inform the County's purchase decisions. This existing practice ensures that mitigation costs are indirectly but effectively considered in evaluating property value.

On multiparcel projects, wetland mitigation has always been taken into consideration. Unless the owner can prove otherwise, the 75-100% price is what is offered for these parcels. This cost is typically lower than or equal to the mitigation costs, as mitigation costs were noted in the IG's report.

- a. Example: Mitigation costs for low quality: \$30,000 - \$50,000 per acre
- b. Winchester Head: \$28,000 per acre
- c. Panther Walk: \$32,000 per acre
- d. Gore Preserve: \$22,500 per acre

Management agrees with the Inspector General's recommendation to enhance transparency for mitigation costs. Language was prepared prior to the issuance of this report for consideration by the Board that would explicitly incorporate the consideration of mitigation costs into the Collier County Purchasing Policy, as set forth in Resolution 2023-10 ("Purchasing Policy").

Recommendation 2: The County's Real Property Management establish appraisal standards disallowing the use of Collier County-purchased properties as comparable sales to ensure effective evaluation of the market and mitigate the risk of setting the price for future purchases.

Management Response: Concurred – Management agrees with the Inspector General's recommendation to enhance clarity and strengthen the County's appraisal framework. Language was prepared prior to the issuance of this report for consideration by the Board that would explicitly disallow the use of Collier County-purchased properties as comparable sales in future appraisals.

Recommendation 3: The County's Real Property Management staff proactively address high variances in appraisal adjustments with third-party appraisers to enhance the County's appraisal review process and its assessment of reasonable sales offers.

Management Response: Concurred – The Purchasing Policy recognizes that a significant disparity between appraisals, regardless of the reason, warrants further review. Section (B) Offer Amount Methodology, subsection 1b states: "Should the two appraised values differ by an amount greater than 20% of the lowest appraisal, a third appraisal will be ordered and the two appraisals nearest in appraised value will be averaged to arrive at the appraised value..."

Real Property Management will develop an appraisal review checklist to ensure adjustments by third-party appraisers are applied consistently to the subject property.

Recommendation 4: County management, in coordination with key stakeholders and staff, propose County purchasing policy (as described in Collier County Resolution 2023-10) revisions to the Board of County Commissioners to update guidelines regarding location and zoning into the Conservation Collier Land Acquisition Program’s purchasing process.

Management Response: Concurred – County management, in coordination with key stakeholders and staff, will propose revisions to the Purchasing Policy for the Board’s consideration. Any updates would aim to reinforce the role of these factors within the appraisal-based valuation process, while recognizing that unique conservation opportunities may, at times, warrant flexibility beyond standard zoning or location criteria.

While the review references assessed values from the Collier County Property Appraiser (CCPA) to support its findings, it is important to clarify that these values are developed for taxation purposes and are not intended to reflect real-time market activity. Because property taxes in Florida are paid in arrears, CCPA assessed values are based on prior-year data and therefore often lag behind current market trends. Additionally, appraisal methods used for tax assessments do not account for parcel-specific conditions, zoning nuances, or conservation value. By contrast, USPAP-compliant appraisals rely on recent comparable sales and individualized property analysis. For these reasons, CCPA assessments should be used with caution when evaluating the market trends and the appropriateness of negotiated purchase prices.

OIG Response: The CCPA assessed values noted in Finding 8, reflect the CCPA’s “Market Value” as reported on property tax forms. The CCPA defines “market value” as “fair market value or just value as determined by the property appraiser pursuant to Florida State Statute[s].” OIG acknowledges that CCPA market values are based off mass appraisals using prior market data; therefore, we adjusted the market value data by one year. OIG views CCPA market value information as useful in reviewing overall market trends when appraised values are being used for more than one year.

Furthermore, we recognize that parcel-specific information is more useful in physical adjustments, such as location and zoning; therefore, OIG used CCPA property sales values within the same zip codes of the properties reviewed in our examination of location adjustments made by appraisers, as indicated in Finding 4.

Recommendation 5: County management request a revision to the County purchasing policy (Collier County Resolution 2023-10) to allow Real Property Management staff to use the lower appraisal value as the appraised value for price negotiations.

Management Response: Concurred – This is a policy decision to be determined by the Board of County Commissioners and the recommendation will be presented to the Board in the future for their consideration.

Recommendation 6: The County’s Real Property Management evaluate landowner value estimates and existing listing prices as part of the County’s decision-making process in determining price negotiations and sales offers to mitigate potential financial risks.

Management Response: Concurred –

Use of Applicant’s Stated Value

While the value estimates submitted by landowners in program applications may offer general context, USPAP standards prohibit appraisers from considering owner-provided figures when determining fair market value. Appraisals must be developed independently, based solely on objective market data and professional judgment. For this reason, a seller’s estimate cannot be used to influence or establish appraised value.

Offers Based on Verified Listing Price

The Purchasing Policy sets the appraised value as the maximum allowable offer amount. However, Management agrees that clarification of the Purchasing Policy would be helpful to ensure it is understood that the County's Real Property Management may offer significantly less than the appraised value when justified. In particular, if a property is actively listed at a lower price at the time the County is ready to make an offer, staff must recommend offering the verified listing price rather than the full appraised value.

To avoid any misunderstanding that the County is obligated to offer up to the appraised value, Management will present a revision to the policy to state explicitly that the appraised value serves as a ceiling, not a required offer amount, and that verified lower listing prices will be used as the offer amount to the Board for their consideration.

Recommendation 7: The County's Real Property Management use real estate market tools and applications to obtain current market information prior to proceeding with County land purchase offers.

Management Response: Concurred – Real Property Management has used CoStar, a real estate data platform, in the past and recognizes its value in supporting land acquisition decisions. Due to procurement challenges, access was temporarily limited. We are currently taking steps to resolve these issues and ensure consistent access to this important market tool moving forward.

Government entities do not typically have direct access to the Multiple Listing Service (MLS) database. In fact, approximately two years ago, the County's Real Property Management reached out to the Naples Area Board of Realtors to request access to MLS data. We were informed at that time that, as a government entity, we were not permitted to obtain access.

Management is in the early stages of developing a solicitation to engage licensed real estate agents for specific acquisition needs. Although a decision has not yet been made regarding the inclusion of Conservation Collier acquisitions, we will evaluate this option. Real estate agents have access not only to properties listed on the MLS but also to off-market properties that may be available. They also utilize current market tools and data to support their search and analysis. This expertise can help supplement our internal efforts, particularly in identifying strategic opportunities that may not be broadly marketed.

Recommendation 8: The County's Real Property Management implement a formal internal review process including checking and verifying appraisal information to ensure accuracy of data and enhance its due diligence.

Management Response: Concurred – For continuity of operations, a formalized checklist or documentation of process will be developed for use by Real Property Management.

Recommendation 9: The County's Real Property Management evaluate internal controls to ensure offer acceptances do not exceed the 30-day acceptance period, as stipulated in the County's offer letter and policy.

Management Response: Concurred – Management will evaluate internal controls to ensure compliance with the 30-day acceptance period outlined in County policy.

To support this, Management proposes to:

- Update the centralized tracking system to log offer dates and flag upcoming expirations.
- Develop an internal checklist or SOP to guide the County's Real Property Management team through actions following offer expiration, including steps based on whether owner re-engagement occurs within or after the six-month window.

These steps will help ensure that offer timelines are managed consistently in accordance with established policy.

Recommendation 10: The County’s Real Property Management evaluate their use of appraisal values exceeding one year of the appraisal effective date and consider obtaining new comparative sales or establishing time limits for sales closure to ensure property appraisal values remain relevant to any market adjustments.

Management Response: Concurred – This is a policy decision to be determined by the Board of County Commissioners and the recommendation will be presented to the Board in the future for their consideration.

Recommendation 11: Conservation Collier staff review existing property purchase records and records management procedures to ensure compliance with the records requirements set forth in Title XI, Section 125.355 of the Florida Statutes.

Management Response: Concurred – Conservation Collier has brought in a manager who also has IT experience to address file management and record keeping.

Recommendation 12: County management, in coordination with key stakeholders and staff, propose County purchasing policy (as described in Collier County Resolution 2023-10) revisions to the Board of County Commissioners to require written procedures regarding third-party appraisals for any County land purchases.

Management Response: Concurred –We will work with stakeholders to develop written procedures that ensure compliance with the County’s Purchasing Policy while maintaining the independence of the valuation process.

It is important to note that the County’s Real Property Management in-house review appraiser provided the Office of the Inspector General with two (2) specific examples within the audit review period in which appraisal irregularities were identified, and corrections were successfully requested. These corrections directly resulted in a cost savings of \$225,000 to the County. These instances were not acknowledged in the report, although they demonstrate that internal appraisal review controls were active and producing measurable results during the period under review.

OIG Response: OIG acknowledges that the County’s Real Property Management provided two property examples in which appraisal irregularities were identified, and corrections were requested. However, these examples were not cited in our report, as they were determined to be outside the scope of our review. Specifically, it was determined that the County did not proceed with one of the property purchases, and the other was acquired in September 2022, which was outside the period of review.

Recommendation 13: The County’s Real Property Management establish formal written procedures for land purchases including appraisal reviews, price negotiations, and closings to ensure maximized savings to Collier County taxpayers.

Management Response: Concurred – As noted in response to Recommendation 8, for continuity of operations, a formalized process will be developed for use by Real Property Management team members.

We agree that documented procedures can enhance consistency and transparency, we will continue to strive to continue to be good stewards of taxpayer funds.

APPENDIX A – MANAGEMENT RESPONSE



June 27, 2025

Mr. Michael T. Ryan, Inspector General
Collier County Clerk of the Circuit Court & Comptroller
Office of Inspector General
3315 Tamiami Trail East, Suite 102
Naples, FL 34112-5324

Mr. Ryan,

On Wednesday, June 11, 2025, members of the Growth Management – Community Development and Transportation Management Services Departments, along with representatives from the County Manager's Office, met with the Office of Inspector General (OIG) to discuss the Conservation Collier Land Acquisition Program Review. The focus of the meeting was to discuss OIG's recommendations for improving the Conservation Collier Purchasing Policy, internal procedures, and appraisal methodologies.

Our response to these recommendations outlines both existing safeguards and several enhancements we plan to implement. These actions are aimed at strengthening policy clarity, improving procedural consistency, and reinforcing the integrity of our appraisal and acquisition practices. Many of these improvements were already in progress prior to this review and reflect our ongoing commitment to responsible land stewardship and public trust.

Recommendation 1: The County's Real Property Management factor mitigation costs into the County's decision-making process for purchasing land parcels as part of the Conservation Collier Land Acquisition Program.

Management Response: Concurred – Mitigation costs are already accounted for in the County's land acquisition process, as they are inherently reflected in the appraised value of a property using the sales comparison approach. This method captures market-based factors, including any known or anticipated mitigation obligations, which in turn inform the County's purchase decisions. This existing practice ensures that mitigation costs are indirectly but effectively considered in evaluating property value.

On multiparcel projects, wetland mitigation has always been taken into consideration. Unless the owner can prove otherwise, the 75-100% price is what is offered for these parcels. This cost is typically lower than or equal to the mitigation costs, as mitigation costs were noted in the IG's report.

- a. Example: Mitigation costs for low quality: \$30,000 - \$50,000 per acre
- b. Winchester Head: \$28,000 per acre
- c. Panther Walk: \$32,000 per acre



3299 Tamiami Trail East, Naples, FL 34112
www.colliercountyfl.gov



d. Gore Preserve: \$22,500 per acre

Management agrees with the Inspector General's recommendation to enhance transparency for mitigation costs. Language was prepared prior to the issuance of this report for consideration by the Board that would explicitly incorporate the consideration of mitigation costs into the Collier County Purchasing Policy, as set forth in Resolution 2023-10 ("Purchasing Policy").

Recommendation 2: The County's Real Property Management establish appraisal standards disallowing the use of Collier County-purchased properties as comparable sales to ensure effective evaluation of the market and mitigate the risk of setting the price for future purchases.

Management Response: Concurred – Management agrees with the Inspector General's recommendation to enhance clarity and strengthen the County's appraisal framework. Language was prepared prior to the issuance of this report for consideration by the Board that would explicitly disallow the use of Collier County-purchased properties as comparable sales in future appraisals.

Recommendation 3: The County's Real Property Management staff proactively address high variances in appraisal adjustments with third-party appraisers to enhance the County's appraisal review process and its assessment of reasonable sales offers.

Management Response: Concurred – The Purchasing Policy recognizes that a significant disparity between appraisals, regardless of the reason, warrants further review. Section (B) Offer Amount Methodology, subsection 1b states: "Should the two appraised values differ by an amount greater than 20% of the lowest appraisal, a third appraisal will be ordered and the two appraisals nearest in appraised value will be averaged to arrive at the appraised value..."

Real Property Management will develop an appraisal review checklist to ensure adjustments by third-party appraisers are applied consistently to the subject property.

Recommendation 4: County management, in coordination with key stakeholders and staff, propose County purchasing policy (as described in Collier County Resolution 2023-10) revisions to the Board of County Commissioners to update guidelines regarding location and zoning into the Conservation Collier Land Acquisition Program's purchasing process.

Management Response: Concurred – County management, in coordination with key stakeholders and staff, will propose revisions to the Purchasing Policy for the Board's consideration. Any updates would aim to reinforce the role of these factors within the appraisal-based valuation process, while recognizing that unique conservation opportunities may, at times, warrant flexibility beyond standard zoning or location criteria.

While the review references assessed values from the Collier County Property Appraiser (CCPA) to support its findings, it is important to clarify that these values are developed for taxation purposes and are not intended





to reflect real-time market activity. Because property taxes in Florida are paid in arrears, CCPA assessed values are based on prior-year data and therefore often lag behind current market trends. Additionally, appraisal methods used for tax assessments do not account for parcel-specific conditions, zoning nuances, or conservation value. By contrast, USPAP-compliant appraisals rely on recent comparable sales and individualized property analysis. For these reasons, CCPA assessments should be used with caution when evaluating the market trends and the appropriateness of negotiated purchase prices.

Recommendation 5: County management request a revision to the County purchasing policy (Collier County Resolution 2023-10) to allow Real Property Management staff to use the lower appraisal value as the appraised value for price negotiations.

Management Response: Concurred – This is a policy decision to be determined by the Board of County Commissioners and the recommendation will be presented to the Board in the future for their consideration.

Recommendation 6: The County's Real Property Management evaluate landowner value estimates and existing listing prices as part of the County's decision-making process in determining price negotiations and sales offers to mitigate potential financial risks.

Management Response: Concurred –

Use of Applicant's Stated Value

While the value estimates submitted by landowners in program applications may offer general context, USPAP standards prohibit appraisers from considering owner-provided figures when determining fair market value. Appraisals must be developed independently, based solely on objective market data and professional judgment. For this reason, a seller's estimate cannot be used to influence or establish appraised value.

Offers Based on Verified Listing Price

The Purchasing Policy sets the appraised value as the maximum allowable offer amount. However, Management agrees that clarification of the Purchasing Policy would be helpful to ensure it is understood that the County's Real Property Management may offer significantly less than the appraised value when justified. In particular, if a property is actively listed at a lower price at the time the County is ready to make an offer, staff must recommend offering the verified listing price rather than the full appraised value.

To avoid any misunderstanding that the County is obligated to offer up to the appraised value, Management will present a revision to the policy to state explicitly that the appraised value serves as a ceiling, not a required offer amount, and that verified lower listing prices will be used as the offer amount to the Board for their consideration.

Recommendation 7: The County's Real Property Management use real estate market tools and applications to obtain current market information prior to proceeding with County land purchase offers.





Management Response: Concurred – Real Property Management has used CoStar, a real estate data platform, in the past and recognizes its value in supporting land acquisition decisions. Due to procurement challenges, access was temporarily limited. We are currently taking steps to resolve these issues and ensure consistent access to this important market tool moving forward.

Government entities do not typically have direct access to the Multiple Listing Service (MLS) database. In fact, approximately two years ago, the County's Real Property Management reached out to the Naples Area Board of Realtors to request access to MLS data. We were informed at that time that, as a government entity, we were not permitted to obtain access.

Management is in the early stages of developing a solicitation to engage licensed real estate agents for specific acquisition needs. Although a decision has not yet been made regarding the inclusion of Conservation Collier acquisitions, we will evaluate this option. Real estate agents have access not only to properties listed on the MLS but also to off-market properties that may be available. They also utilize current market tools and data to support their search and analysis. This expertise can help supplement our internal efforts, particularly in identifying strategic opportunities that may not be broadly marketed.

Recommendation 8: The County's Real Property Management implement a formal internal review process including checking and verifying appraisal information to ensure accuracy of data and enhance its due diligence.

Management Response: Concurred – For continuity of operations, a formalized checklist or documentation of process will be developed for use by Real Property Management.

Recommendation 9: The County's Real Property Management evaluate internal controls to ensure offer acceptances do not exceed the 30-day acceptance period, as stipulated in the County's offer letter and policy.

Management Response: Concurred – Management will evaluate internal controls to ensure compliance with the 30-day acceptance period outlined in County policy.

To support this, Management proposes to:

- Update the centralized tracking system to log offer dates and flag upcoming expirations.
- Develop an internal checklist or SOP to guide the County's Real Property Management team through actions following offer expiration, including steps based on whether owner re-engagement occurs within or after the six-month window.

These steps will help ensure that offer timelines are managed consistently in accordance with established policy.

Recommendation 10: The County's Real Property Management evaluate their use of appraisal values exceeding one year of the appraisal effective date and consider obtaining new comparative sales or establishing time limits for sales closure to ensure property appraisal values remain relevant to any market adjustments.



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www.colliercountyfl.gov



Management Response: Concurred – This is a policy decision to be determined by the Board of County Commissioners and the recommendation will be presented to the Board in the future for their consideration.

Recommendation 11: Conservation Collier staff review existing property purchase records and records management procedures to ensure compliance with the records requirements set forth in Title XI, Section 125.355 of the Florida Statutes.

Management Response: Concurred – Conservation Collier has brought in a manager who also has IT experience to address file management and record keeping.

Recommendation 12: County management, in coordination with key stakeholders and staff, propose County purchasing policy (as described in Collier County Resolution 2023-10) revisions to the Board of County Commissioners to require written procedures regarding third-party appraisals for any County land purchases.

Management Response: Concurred – We will work with stakeholders to develop written procedures that ensure compliance with the County's Purchasing Policy while maintaining the independence of the valuation process.

It is important to note that the County's Real Property Management in-house review appraiser provided the Office of the Inspector General with two (2) specific examples within the audit review period in which appraisal irregularities were identified, and corrections were successfully requested. These corrections directly resulted in a cost savings of \$225,000 to the County. These instances were not acknowledged in the report, although they demonstrate that internal appraisal review controls were active and producing measurable results during the period under review.

Recommendation 13: The County's Real Property Management establish formal written procedures for land purchases including appraisal reviews, price negotiations, and closings to ensure maximized savings to Collier County taxpayers.

Management Response: Concurred – As noted in response to Recommendation 8, for continuity of operations, a formalized process will be developed for use by Real Property Management team members.

We agree that documented procedures can enhance consistency and transparency, we will continue to strive to continue to be good stewards of taxpayer funds.

Sincerely,

ScottTrinity

Digitally signed by
ScottTrinity
Date: 2025.07.08
15:55:19 -0400

Trinity Scott, Department Head
Transportation Management Services

FrenchJames

Digitally signed by
FrenchJames
Date: 2025.07.02
11:09:20 -0400

James French, Department Head
Growth Management Community Development



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APPENDIX B – CCLAP APPRAISAL PROCESS

PROPERTY SELECTION

Properties are selected by the CCLAC based on initial screening reports. The initial screening reports are used by Conservation Collier staff to ensure properties selected for the program meet established criteria. Properties are rated on conservation land criteria such as ecological value, human value, restoration and management, and vulnerability. While the top score would be 400 points, most of the initial screening reports for our samples ranged from 200 to 290. The selection process and property ratings were not a primary focus of this review.

APPRAISAL COST STRATEGY

Single Appraisals

A single appraisal is often used to evaluate the value of a single real property and is commonly used for real estate transactions, mortgages, and property tax assessments. Generally, Conservation Collier uses a single appraisal in cases where the parcel is a standalone property from other preserves or contains unique characteristics.

Mass Appraisals

A mass appraisal cost strategy is primarily used in multi-parcel projects, where parcels are primarily located in the same area and resemble the same physical characteristics. During our review of 2023-2025 land acquisitions, this strategy was primarily used in the Winchester Head Preserve, Robert Gore Preserve, and Panther Walk Preserve areas. In some instances, such as the Robert Gore Preserve, there was a mix of both appraisal strategies.

When the mass appraisal strategy is used, Conservation Collier takes the lowest appraised value (100 percent wetlands) to extend an offer on parcels with wetlands. With this cost strategy, it appears that properties bought within the area are used as comparative sales in the multi-parcel appraisal.

SALES APPROACH METHODOLOGY

In all CCLAP appraisals, the County's third-party appraisers used the sales approach methodology. Appraisers commonly refer to this methodology as the most appropriate methodology for vacant lots.

According to at least one third-party appraiser's report, "The **Sales Comparison Approach** compares sales of similar properties with the subject property. Each comparable sale is adjusted for its inferior or superior characteristics. The values derived from the adjusted comparable sales form a range of value for the subject. By process of correlation and analysis, a final indicated value is derived. This approach is most reliable in an active market and is least reliable when valuing a property for which no direct comparable sales data is available."

COMPARABLE SALES

The sales approach used by appraisers require them to obtain comparable sales. Often, comparable sale properties are not exactly like the subject property. If a typical buyer would perceive the difference to be significant, then adjustment(s) must be made to the comparable sales so that in the end each offers a realistic indication of value for the subject.

Ideally, comparable sales should be recent and within an arm's length of the subject parcel being evaluated. If the appraiser is unable to find comparable sales within these parameters, they may obtain comparable sales from further in the past or obtain sales from a location farther away from the property.

Adjusting comparable sales is a two-step process. First, adjustments are made so that all the comparable sales meet the standard of a current "market" transaction.

1 - MARKET ADJUSTMENTS

Market adjustments are used by appraisers to bring the comparative sales of the properties into alignment with current market trends at the time of the appraisal. The objective of these adjustments is to bring historic sales current to the appraisal effective value as of date. To achieve this objective, the appraiser evaluates current market trends relating to the parcel being evaluated. The scope of reviewing the market can range from various property values in Collier County to a specific County zip code.

The appraiser will use the sale dates to estimate the market period and determine how the comparative sales period collectively corresponds to market conditions. If market adjustments are required, the appraiser evaluates each sale and makes the appropriate percentage adjustment. Two commonly used sources of information that OIG used in Conservation Collier property reviews include the Naples Area Board of Realtors and the Collier County Property Appraiser.

Naples Area Board of Realtors (NABOR)

The Naples Area Board of Realtors provides members and real estate agents with Multiple Listing Service (MLS) data.

Collier County Property Appraiser

The Collier County Property Appraiser (CCPA) office can provide sales history, warranty deed documents, land use information, and market values. Using their website you can determine:

1. How much was this parcel purchased for in the past?
2. Who previously owned the property?
3. What was the market value year over year?

This type of information can provide land buyers with valuable insights into the market specific to Collier County in making decisions about estimated property values. Both the RPM staff and the appraisers review this public information when reviewing land values. In addition, the CCPA office provides a market value for all parcels.

Per the CCPA's website: Of the 14 samples which closed in 2024, 11 were shown to be valued lower than in 2023. Two were valued higher and one remained the same.

During our review of Conservation Collier properties, we reviewed the CCPA sales history for each sample land purchase. The parcels did not have a lot of sales history prior to the purchase by Collier County.

Below illustrates a few of the Robert Gore Preserve properties we reviewed:

Property	Sale History		
	Owner	Date	Amount
Perez Castro Parcel: 41560600006 (4)	TerraTrust	2/20/2015	\$6,000
	Castro	5/26/2015	\$12,000
	Collier County	12/9/2023	\$27,600
	Castro ¹¹	1/03/2024	\$12,000
Trigoura Property Parcel: 41507440009 (2)	Stubbs	2/13/2019	\$4,000
	Trigoura	5/22/2019	\$16,000
	Collier County	11/1/2023	\$30,000
Kleinberger Parcel: 41500480008 (10)	Davenport	10/19/2019	\$41,200
	Kleinberger	11/25/2019	\$0
	Collier County	3/15/2024	\$104,500

Market Adjustments Explanation

If an appraiser determines that comparable sale dates require market adjustments to better reflect current market trends, they will add commentary providing an explanation of their view of the market trends in the appraisal. Such commentary explanations can be important to understand what information the appraiser is looking at to assess the market.

Out of the 26 samples reviewed, we reviewed the sales date of 198 comparative sales against the appraisal market value date (excluding listings and pending sales).

Time Between Comparative Sale Date and Appraisal Market Value Date	Count	Percentage
Under 6 Months	120	60%
Between 6-11 Months	59	30%
Over 1 Year	19	10%
Total	198	

2 - PHYSICAL ADJUSTMENTS

The second group of adjustments is made after an appropriate unit of comparison is chosen. These adjustments account for physical differences like location, physical characteristics and size. Sometimes adjustment is required for differences in the permitted land use (zoning) or in the availability of public service (infrastructure). When the adjustment process is complete, the unit value indications are reconciled and converted into an estimate of value for the subject.

¹¹ TerraTrust originally purchased this foreclosure property. In May 2015, Castro then purchased the property with a pending obligation. CCPA sales history records show that the deed transfer to Collier County on December 9, 2023, prior to a deed release to the prior property owner, Castro, in January 2024. OIG intends to further review this item.

APPRAISAL REVIEW

The RPM has staff which review appraisals as they are submitted by vendors. Appraisals are reviewed for appropriate content and must be electronically accepted before payment is made to the vendor. Approved appraisals are then available for staff to use in solicitations or offers.

MASS APPRAISAL INTENT SOLICITATION

In multi-parcel project areas, Conservation Collier staff will work with the CCLAC to approve areas to be solicited based upon the current program budget. Once approval is received, staff sends the letters of intent to landowners to raise awareness of the opportunity to participate in the program.

OFFER AND ACCEPTANCE

RPM staff are tasked with presenting an offer to the landowner. Per the current purchasing policy, staff are allowed to negotiate offers up to but not exceeding the appraised value of the property.

After the offer has been accepted by the landowner, Conservation Collier staff present the property to the BCC for final approval before closing.

CLOSING

The period between signing the contract and closing generally lasts between 60-90 days. Once the purchase is approved by the BCC, the RPM staff work with title companies to ensure that the title is clear, and everything is ready for closing.

OIG reviewed the time between the appraisal market value date:

Time Between Appraisal Market Value Date and Closing	Count	Percentage	Overall Average Time to Close
Under 6 Months	4	11%	8 Months
6 Months – 1 Year	24	69%	
Over 1 Year	7	20%	
Total	35		

As indicated in the above table, on average, it took a total of **eight months** to close on the purchase once the appraisal report was received.

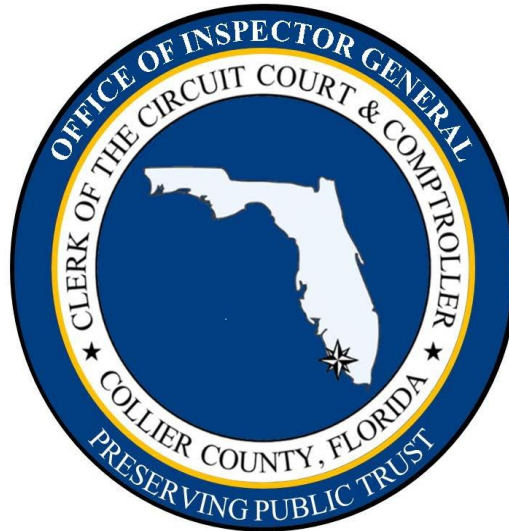


ABBREVIATIONS

BCC	Board of County Commissioners
CCPA	Collier County Property Appraiser
CCLAAC	Conservation Collier Land Acquisition Advisory Committee
CCLAP	Conservation Collier Land Acquisition Program
MLS	Multiple Listing Service
RPM	Real Property Management
USPAP	Uniform Standards of Professional Appraisal Practice

Report Fraud, Waste, or Abuse of County Funds or Resources

Contact the Office of Inspector General



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ATTN: Office of Inspector General
3315 Tamiami Trail East, Suite 102
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In-Person:

Collier County Clerk of the Circuit Court
3315 Tamiami Trail East, Suite 316
Naples, FL 34112



Crystal K. Kinzel

**Clerk of the Circuit Court and Comptroller
Collier County, Florida**

collierclerk.com

RESOLUTION NO. 2025-_____

**A RESOLUTION AMENDING RESOLUTION NO. 2007-300, AS AMENDED,
REVISING THE PURCHASING POLICY FOR THE ACQUISITION
OF LANDS BY THE CONSERVATION COLLIER LAND ACQUISITION
PROGRAM.**

WHEREAS, Collier County has recognized the need to plan for future growth and has initiated a long-term program, known as Conservation Collier, to acquire, protect, restore, and manage environmentally sensitive lands in perpetuity and to provide public open space for the benefit of present and future generations; and

WHEREAS, the Board of County Commissioners (Board) has created Conservation Collier and implemented its policies, goals, and objectives by adopting Ordinance No. 2002-63, as amended.

WHEREAS, the Conservation Collier Program seeks to acquire property based upon a reasonable and appropriate purchase price; and

WHEREAS, the Board first adopted Resolution No. 2003-195, to establish a methodology to value lands considered for acquisition; and

WHEREAS, the Board has since superseded Resolution No. 2003-195 with Resolution No. 2007-300, as amended by Resolution 2023-10, the updates made to clarify the acquisition process as the Conservation Collier Program evolved; and

WHEREAS, the Board has determined that additional updates to the Offer Amount Methodology are necessary, along with minor housekeeping revisions to ensure clarity.

NOW, THEREFORE, BE IT RESOLVED, BY THE BOARD OF COUNTY COMMISSIONERS OF COLLIER COUNTY, FLORIDA that Resolution 2007-300, as amended, is hereby amended as follows:

SECTION I. Findings

It is found and declared that:

- (A) A written policy and procedure for how the Conservation Collier Program values land is required.
- (B) The Collier County ~~Real Estate Services Section~~ Real Property Management has a current policy for the purchase of lands that incorporates State and Federal Land acquisition procedures.
- (C) The CCLAAC, first in subcommittee and then after discussion by the full Committee on May 12, 2003, has unanimously recommended a policy for land purchasing in the Conservation Collier Program.

- (D) The CCLAAC, first in subcommittee and then after discussion by the full Committee on May 14, 2007, has unanimously recommended an updated policy for land purchasing in the Conservation Collier Program.

SECTION II. Be it further resolved that the Collier County Board of County Commissioners hereby adopts the following Property Acquisition Policy for the Conservation Collier Program.

~~(A)~~ **(A)** Transfer of Development Rights (TDR):

- ~~1. For properties within the Rural Fringe Mixed Use District (RFMUD) "Sending" lands, property owners must do one of the following prior to the appraisal process:~~
 - ~~a. Separate all four (4) TDR credits resulting in conveyance of the property to Conservation Collier, or~~
 - ~~b. Separate the first two (2) TDR credits and discount the resulting property value by an amount agreed upon by Collier County and property owners to remove all prohibited exotic plants as identified in the Collier County Land Development Code, Section 3.05.08.~~
- ~~2. Once TDR credits are extinguished, Real Estate Services staff will proceed with ordering appraisal(s) based on the extinguishing of TDR credits.~~

~~(B)~~ **(A)** Offer Amount Methodology:

1. If the estimated value of the property is less than \$500,000.00, ~~Real Estate Services staff~~ Real Property Management shall secure one narrative appraisal report from a licensed independent real estate appraiser on an approved list with Collier County and on the Florida Division of State Lands list of appraisers. The Offer Amount shall be determined by staff, but shall be no more than the appraised value as adjusted by the appraiser to reflect reconciled costs, unless the property has already been determined to be a wetland property and has been appraised as such. For purposes of this policy "reconciled costs," mean reasonable adjustments supported by appraiser's analysis to account for costs necessary to achieve marketable condition, including, but not limited to, mitigation expenses described in Chapter 373, Florida Statutes, as well as any softs costs, such as permitting and environmental remediation. The Offer Amount shall be the verified lower listing price when a verified listing price is available and is lower than the appraised value. If the estimated value of the property is \$500,000.00 or greater, ~~Real Estate Services staff~~ Real Property Management shall offer no more than the appraised value as adjusted by the appraiser to reflect reconciled costs, if applicable, and shall:
 - a. Secure two narrative appraisal reports from licensed independent real estate appraisers on Collier County's and the Florida Division of State Land's list of approved appraisers. The appraised value will be equal to the average of the two appraisals. The Offer Amount shall be determined by staff, but shall be no more than the appraised value with adjustments, if applicable.

- b. Should the two appraised values differ by an amount greater than 20% of the lowest appraisal, a third appraisal will be ordered, and the two appraisals nearest in appraised value will be averaged to arrive at the appraised value. The Offer Amount shall be determined by staff, but shall be no more than the appraised value with adjustments, if applicable. When a verified listing price is available and is lower than the lower of the two appraisals, the Offer Amount shall be the verified lower listing price. When more than one appraisal is obtained, the Offer amount shall be based on the lowest of the appraised values.
- c. Before the County orders any appraisal, the owner must provide a wetland determination for the property, no older than five years, at their sole cost and expense, unless the property has already been identified as a wetland by Conservation Collier staff, in which case no such determination will be required. The appraisal will not proceed until the determination is received and reviewed.
3. All appraisals will be reviewed by Collier County's ~~Real Estate Services staff~~ Real Property Management appraiser and any appraisal that does not meet generally accepted appraisal standards will not be used. Either the appraiser must bring the appraisal to compliance or a replacement appraisal will be ordered. Properties listed for sale or pending properties shall not be used as comparable sales in the appraisals. Other Conservation Collier properties shall not be used as comparable sales in the appraisals. If comparable sales used in the appraisal are located outside Collier County, or if they differ significantly in zoning, land use designation, or development potential from the subject property, such differences must be clearly identified, and appropriate market-based adjustments must be applied and justified within the appraisal report.
4. Should the offer not be accepted by the owner within the thirty (30) day acceptance period, no further contact will be initiated by the ~~Real Estate Services staff~~ Real Property Management in respect to that offer. If the owner again contacts the County before six (6) months has elapsed from expiration of the offer, offering to sell the same property, the same offer can again be made upon certification of the existing appraisal by the County's ~~Real Estate~~ Real Property Management Appraiser. If the owner contacts the County after more than six (6) months have elapsed since expiration of the offer, and the property is still on the Active Acquisition List, a new appraisal shall be ordered by ~~Real Estate Services staff~~ Real Property Management pursuant to this policy, with the owner paying for this new appraisal in advance. Without such payment, a new appraisal shall not be ordered.

~~(C)~~ (B) Acquisition Process:

1. Upon authorization by the Board to proceed with acquisition of properties included on the "Active Acquisition List," ~~Real Estate Services staff~~ Real Property Management will perform a title search for each property on the Active Acquisition List.
2. Upon completion of the title searches, ~~Real Estate Services staff~~ Real Property Management will send letters to the owners of the properties on the Active Acquisition List outlining the appraisal and Offer Amount procedure and request a response regarding whether they remain favorable to going forward with the sale. Owners will

also be advised that the County will accept whole or partial land donations. ~~Real Estate Services staff~~ Real Property Management will follow-up by telephone within five (5) business days of the letter being mailed.

3. For all properties with positive responses from their owners, the ~~Real Estate Services staff~~ Real Property Management will order real estate appraisals in accordance with the policy outlined in the Offer Amount Methodology above. Appraisals will not be secured on property being donated.

4. Upon receipt of appraisals, Real Property Management Section's staff appraiser will provide a review and, if the appraisals meet appraisal standards, the staff appraiser will determine the Offer Amount according to the policy outlined in the Offer Amount Methodology above. Collier County will not agree to pay a higher amount nor give consideration to an owner's appraisal.

5. ~~Real Estate Services staff~~ Real Property Management will contact each owner and advise him or her of the Offer Amount for the property. A letter verifying the Offer Amount giving the owner 30 days from the date of mailing to accept the Offer Amount. ~~Real Estate Services staff~~ Real Property Management will follow-up by telephone within ten (10) business days of the letter being mailed.

6. Copies of appraisals will be made available to owners upon request.

7. Upon being advised by an owner of his or her acceptance of the Offer Amount, ~~Real Estate Services staff~~ Real Property Management, will order a Title Commitment and, upon its receipt, prepare a Purchase Contract. At the time of the owner's execution of the Contract, the appraisal relied upon to determine the Offer Amount shall not be more than one year old. If more than one year has elapsed since the date of the appraisal report, a new appraisal shall be obtained in accordance with this policy. The Contract will then be mailed to the owner for review and execution.

8. Upon receipt of a signed Contract from the property owner(s), ~~Real Estate Services staff~~ Real Property Management will present the Contract to the Board for approval. If approved, staff will present the Contract to the Chairman of the Board for execution. Staff will then proceed to clear title acceptable to the County Attorney's Office and schedule a closing date.

9. Post closing, ~~Real Estate Services staff~~ Real Property Management will record all required documents, secure a Title Insurance Policy, and release the property to the Environmental Services Department.

~~(D)~~ (C) Expenses:

1. Sellers shall be responsible for all documentary stamp taxes due on the recording of the conveyance instrument, pro-rated property taxes, costs associated with the satisfaction or release of any liens, encumbrances or exceptions necessary to clear title, including the recording fees on all curative instruments.
2. Collier County shall be responsible for the costs of appraisals, title commitments, title insurance, recording of conveyance instruments, environmental audits, and property surveys, if required by the County.

SECTION III. Effective Date.

This Resolution shall go into effect immediately upon its passage and adoption.

THIS RESOLUTION ADOPTED after motion; second and majority vote favoring same, this ____ day of _____, 2025.

ATTEST:
CRYSTAL K. KINZEL, CLERK

BOARD OF COUNTY COMMISSIONERS
COLLIER COUNTY, FLORIDA

By: _____
_____, Deputy Clerk

By: _____
Burt L. Saunders, Chairman

Approved as form and legality:

Sally A. Ashkar, Assistant County Attorney