

BEFORE THE IDAHO BOARD OF TAX APPEALS

RANDALL ASTRAMOVICH,	)	
	)	
Appellant,	)	APPEAL NO. 19-A-1435
	)	
v.	)	FINAL DECISION
	)	AND ORDER
BANNOCK COUNTY,	)	
	)	
Respondent.	)	
_____	)	

**RESIDENTIAL PROPERTY APPEAL**

The appeal is taken from a decision of the Bannock County Board of Equalization modifying a protest of valuation for taxing purposes on property described as Parcel No. RPR3851026000. The appeal concerns the 2019 tax year.

The parties stipulated to have the Board hear this matter on the documentary record without the necessity of personal appearances at hearing. The Board subsequently ordered all information and evidence be submitted by both parties, after which the record was closed. The Board now renders its decision based upon the record created. Appellant Randall Astramovich was self-represented. County Appraiser Celeste Gunn represented Respondent.

Board Members Leland Heinrich, David Kinghorn and Kenneth Nuhn join in issuing this decision.

**The issue on appeal concerns the market value of an improved residential property.**

**The decision of the Bannock County Board of Equalization is affirmed.**

FINDINGS OF FACT

The assessed land value is \$75,725, and the improvements' value is \$230,615, totaling \$306,340. Appellant contends the land value is \$79,712, and the improvements' value is \$232,069, totaling \$311,781. Subject was adjusted from \$358,296 to \$306,340 through the Board of Equalization (BOE) process.

The subject property is a 2.79 acre parcel located on the outskirts of Pocatello, Idaho. The

parcel is improved with a multi-level, log dwelling constructed in 1979. The dwelling totals 2,639 square feet in size, with 1,044 square feet on the main level, 551 square feet on the upper level, and 1,022 square feet of basement, of which 783 square feet are finished. The property is further improved with a 576 square foot detached garage.

Appellant challenged subject's 2019 assessment. It was argued the condition of the residence was not adequately considered. In support of the value claim, Appellant offered information on two (2) contractor bids for a damaged deck and damaged roof. Contractor estimates provided demonstrate that the deck and roofing repair would total \$10,685, which equates to the assessed value reduction requested by Appellant.

For value evidence, Appellant provided information on five (5) sales which transpired in 2018. Though there were notable variances, the sale residences were generally similar to subject in terms of square footage and lot size. The sales provided varied in age, utility, and design, with no adjustments made for dissimilarities, and little information was provided as to proximity to subject. The sale prices ranged from \$275,000 to \$318,760.

Respondent likewise offered sales information in support of its assessment. Respondent analyzed three (3) residential sales which occurred during 2018. Respondent reported the sale residences ranged in size from 2,723 square feet to 3,420 square feet, and in effective age from 11 to 45 years. The sale prices ranged from \$332,500 to \$379,100. Respondent first adjusted the sale prices for time of sale. Next, each sale property was directly compared to subject, and adjustments were made for differences in property characteristics. After all appraisal adjustments, Respondent concluded prices ranging from \$248,396 to \$337,231, or \$104 to \$142

per square foot. Subject is assessed at \$129 per square foot.

### CONCLUSIONS OF LAW

This Board's goal in its proceedings is the acquisition of sufficient, accurate evidence to support a determination of fair market value. This Board, giving full opportunity for all arguments and having considered the evidence submitted by the parties in support of their respective positions, hereby enters the following conclusions.

Idaho Code § 63-205 requires taxable property be assessed at market value annually on January 1; January 1, 2019, in this case. Market value is defined in Idaho Code § 63-201, as,

“Market value” means the amount of United States dollars or equivalent for which, in all probability, a property would exchange hands between a willing seller, under no compulsion to sell, and an informed, capable buyer, with a reasonable time allowed to consummate the sale, substantiated by a reasonable down or full cash payment.

Market value is estimated according to recognized appraisal methods and techniques. There are three (3) approaches to value: the sales comparison approach, the cost approach, and the income approach. The sales comparison approach is commonly used in the valuation of a residential property. In general terms, the approach examines recent sales of similar property and considers adjustments for differences in property characteristics between the subject and the sale properties.

Both parties offered value opinions using the sales comparison approach. The Board appreciated the parties' efforts in this regard. All the sales provided by both parties were timely. Respondent directly compared three (3) sales to subject and made adjustments for differences and time of sale. Respondent concluded adjusted prices ranging from \$248,396 to \$337,231. Subject is assessed at \$306,340.

Appellant offered five (5) sales to support a lower valuation. The sale prices ranged from \$275,000 to \$318,760. Appellant is requesting a total market value of \$311,781, which is higher than subject's 2019 assessed value.

In appeals to this Board, pursuant to Idaho Code § 63-511, the burden is with the Appellant to establish subject's valuation is erroneous by a preponderance of the evidence. Given the evidence present in this matter, the Board finds subject is already at a lower assessed value than Appellant's request. Based on all the timely sales information in the record, the Board finds subject's current market value of \$306,340 is supported.

Based on the above, the decision of the Bannock County Board of Equalization is affirmed.

#### FINAL ORDER

In accordance with the foregoing Final Decision, IT IS ORDERED that the decision of the Bannock County Board of Equalization concerning the subject parcel be, and the same hereby is, AFFIRMED.

DATED this 10<sup>th</sup> day of April, 2020.