

BEFORE THE IDAHO BOARD OF TAX APPEALS

JULIE ANDERSON,	)	
	)	
Appellant,	)	APPEAL NO. 25-A-1193
	)	
v.	)	FINAL DECISION AND ORDER
	)	
BANNOCK COUNTY,	)	
	)	
Respondent.	)	
	)	
_____	)	

**RESIDENTIAL PROPERTY APPEAL**

This appeal is taken from a decision of the Bannock County Board of Equalization denying an appeal of the valuation for taxing purposes on property described by Parcel No. RPRPPSP000200. The appeal concerns the 2025 tax year.

This matter came on for hearing November 14, 2025, in Pocatello, Idaho, before Board Member Doug Wallis. Appellant Julie Anderson was self-represented. Bannock County Assessor Anita Hymas represented Respondent.

Board Members Kenneth Nuhn and Doug Wallis 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 \$60,000, and the improvements' value is \$168,968, totaling \$228,968. Appellant contends the correct land value is \$42,000, and the improvements' value is \$138,000, totaling \$180,000.

The subject property is a .14 acre residential parcel located in Pocatello, Idaho. The property is improved with a one (1) story residence comprised of 1,092 square feet

on the main floor and 1,204 square feet in the basement, of which 224 square feet are finished. The residence was constructed in 1920 and was relocated to its present location in 1978, at which time it was placed on a new basement foundation with new electrical and plumbing.

Appellant's concerns centered on subject's land value compared to other assessed land values. In this regard, Appellant referenced assessments of roughly twenty (20) other improved properties. All the referenced parcels were single-family residential properties, with the exception of a 9.92 acre commercial parcel and an apartment building included in the data set. The single-family residential properties varied in size from .05 to 5.96 acres, with assessed land values ranging from \$39,200 to \$146,328. Appellant pointed out some inconsistencies in the assessments, such as a nearly one (1) acre parcel located two (2) doors down from subject with a \$60,000 land value. Of particular focus was a .42 acre parcel on subject's street with the same \$60,000 land value as subject's .14 acres. It was contended land values in the area are inconsistent and, in Appellant's view, subject's land value is grossly overstated given the smaller lot size.

Respondent explained residential land values in subject's market area are not determined on a per-acre or per-square-foot basis. Instead, a site value is assigned according to the size bracket into which a particular property fits. A unique land value schedule is used for each distinct market area in the county based on sales from within each respective market area. Respondent shared parcels up to .10 acres in subject's neighborhood are assessed a site value of \$42,000, and parcels between .11 and .50 acres have a site value of \$60,000, with larger parcels assessed a different site value. Respondent pointed out many of the properties referenced by Appellant were located

outside subject's neighborhood so were assessed using different land value tables, which is why the values appear inconsistent. Regarding the nearly one (1) acre parcel located a couple doors down from subject, Respondent explained the \$60,000 assessed land value was an error that would be corrected for the next assessment year. Respondent maintained subject's land value was consistent with others in the neighborhood.

Respondent additionally shared information on four (4) recent improved residential sales. The sale residences were all one (1) story designs with basements constructed from 1920 to 1941. The sale residences ranged in gross size from 1,278 to 1,762 square feet, and in finished living area from 1,066 to 1,336 square feet. Lot sizes varied from .10 to .25 acres. Respondent reported sale prices from \$230,000 to \$262,900 and adjusted prices from \$235,750 to \$277,950, after applying an undisclosed time-adjustment factor. After removing assessed land and other improvement values from the respective sale prices, Respondent calculated residual price indications for the sale residences ranging from \$175,750 to \$216,077, or from \$135 to \$203 per finished square foot. Subject's residence is assessed at \$162,208, or \$123 per square foot, which was reasonable in Respondent's view.

#### CONCLUSIONS OF LAW

This Board's goal in its hearings is the acquisition of sufficient, accurate evidence to support a determination of market value in fee simple interest or, as applicable, a property's exempt status. This Board, giving full opportunity for all arguments and having considered all the testimony and documentary evidence submitted by the parties, hereby enters the following.

Idaho Code § 63-205 requires taxable property be assessed at market value annually on January 1; January 1, 2025, in this case. Market value is always estimated as of a precise point in time. Idaho Code § 63-201 provides the following definition,

“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. The sales comparison approach, the cost approach, and the income approach comprise the three (3) primary methods for determining market value. *Merris v. Ada Cnty.*, 100 Idaho 59, 63, 593 P.2d 394, 398 (1979). 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, with adjustments made for relevant differences in property characteristics between subject and the sale properties.

Appellant did not develop a traditional valuation model but instead focused on comparisons of subject’s land value to land assessments of other properties. Appellant highlighted a couple larger parcels in subject’s immediate neighborhood and questioned why they were assessed the same land value as the appreciably smaller subject lot. While the Board understands Appellant’s concerns, land values in subject’s market area were determined on a site value basis, not on a per-unit basis. Such a methodology is not uncommon in the Board’s experience. The primary value of a residential lot is in its capacity to support a residence and full residential use. Acreage beyond what is necessary for establishing the residence is additional ground that contributes to the property’s value at a considerably lesser rate. In the case of a fully developed residential

neighborhood like subject's, small variances in lot size have little impact on sale price because, once a residence is constructed, the parcel's residential potential has been realized, which is what the buyer is purchasing. The primary cause of value differences in residential neighborhoods like subject's lies in the improvements, specifically the residences, which can vary widely in age, size, quality, and condition. This was reflected in the assessment data offered by Appellant, where the assessed improvement values differed greatly, while the land values were relatively consistent within the individual size brackets of Respondent's land schedule.

The Board was also not persuaded subject was assessed inequitably with the other properties referenced by Appellant. First, the properties varied greatly in lot size, from .05 to 9.92 acres, so it was difficult to make any meaningful comparisons with subject, particularly on a per-unit basis, which generally requires a high degree of similarity between the properties being compared in order to produce reliable results. Also, several of the properties were located more than ten (10) miles away in different towns, and one (1) was a commercial property, which is an entirely different property type. With so much variance in the data, the Board was strained to make reasonable correlations to subject's market value.

While the assessment data shared by Appellant showed variances in land values between different market areas, the data also revealed that Respondent's land value schedule was consistently applied to subject's immediate neighborhood. Indeed, all five (5) parcels in the data set with lot sizes of .10 acres or less located within roughly two (2) miles of subject had land values of \$42,000, and parcels between .11 and .50 acres were assessed at \$60,000. The subject lot, at .14 acres, falls into the latter category, so was

assessed the same \$60,000 site value assigned to all other neighborhood lots in the same size bracket.

Regarding equitable assessment, the Idaho Supreme Court has opined, “[a]n individual who claims that a selective assessment procedure had deprived him or her of the protection guaranteed by the state constitutional requirement of uniformity of taxation must show a deliberate plan to discriminate based upon an unjustifiable or arbitrary classification.” *Xerox Corp. v. Ada Cnty. Assessor*, 101 Idaho 138, 144, 609 P.2d 1129, 1135 (1980). No such discriminatory plan or action occurred in the assessment of the subject property. Quite the opposite; the assessment data showed consistency in land values in subject’s market area, and there was no indication subject was assessed differently.

It should also be noted that while Appellant’s focus was on subject’s land value, it is ultimately the total market value of the property that is relevant for purposes of assessment. Property is typically purchased as a single, whole unit, not by the individual land and improvement components. In other words, the allocation of value between land and improvements is less important than the property’s total value. In this regard, Respondent’s sales data was supportive of subject’s total valuation. The sale residences were comparable to the subject residence in age, design, and finished living area. Lot sizes were also generally similar, ranging from .10 to .25 acres. Respondent reported sale prices from \$230,000 to \$262,900, and time-adjusted prices from \$235,750 to \$277,950. Though the Board would have preferred a more traditional comparative sales analysis, with adjustments made for differences in property characteristics, subject’s assessed

value is lower than all the sale prices in the record, both adjusted and unadjusted, so it was difficult to conclude subject's valuation is above market.

In accordance with Idaho Code § 63-511, the burden is with Appellant to establish subject's valuation is erroneous by a preponderance of the evidence. Given the record in this matter, the Board did not find the burden of proof satisfied. Appellant relied on a comparison of assessed values, which is not a recognized valuation approach. Appellant did identify a couple inconsistent land values in the neighborhood, but the isolated inconsistencies were noted to be errors and were not found to be suggestive of inequitable assessment of the subject property. In all, the Board found subject's current valuation reasonable, so will affirm the decision of the Bannock County Board of Equalization.

#### 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 12<sup>th</sup> day of January, 2026.