

BEFORE THE IDAHO BOARD OF TAX APPEALS

GARY WIMENITZ,	)	
	)	
Appellant,	)	APPEAL NO. 25-A-1022
	)	
v.	)	FINAL DECISION AND ORDER
	)	
ADA COUNTY,	)	
	)	
Respondent.	)	
	)	
_____	)	

**RESIDENTIAL PROPERTY APPEAL**

This appeal is taken from a decision of the Ada County Board of Equalization denying an appeal of the valuation for taxing purposes on property described by Parcel No. R9227970050. The appeal concerns the 2025 tax year.

This matter came on for hearing October 23, 2025, in Boise, Idaho, before Hearing Officer Travis VanLith. Appellant Gary Wimenitz was self-represented. Ada County Appraisal Manager Erin Brady 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 Ada County Board of Equalization is affirmed.**

FINDINGS OF FACT

The assessed land value is \$238,300, and the improvements' value is \$480,900, totaling \$719,200. Appellant contends the correct total value is \$645,000.

The subject property is a .08 acre parcel with a 2,308 square foot, two (2) story townhome built in 1979 with three (3) bedrooms, two and one half (2½) bathrooms and an attached garage. It is part of the Warm Springs Hollow subdivision in east Boise.

Appellant claimed the 17% increase in subject's assessed value was inconsistent with actual market trends for townhomes in Ada County from the prior year. Appellant provided market statistics about condos, townhomes, and mobile/manufactured homes sourced from a regional realtor website. The statistics indicated the median sale price of an Ada County townhome decreased by 2.2% from December 2023 to December 2024. In Appellant's opinion, Respondent did not give proper consideration to the market for townhomes when increasing subject's assessed value. In light of the statistics provided, Appellant requested subject's assessed value be reduced.

Respondent highlighted subject's subdivision, though not in Boise's historic district, is quite near the historic district and is a highly desirable neighborhood. As such, units do not sell often, which Respondent supported with the fact the three (3) sales in the comparative sales analysis comprised the totality of the sales in subject's neighborhood for the eighteen (18) months prior to the January 1, 2025, lien date. Additionally, Respondent stated townhome complexes can vary greatly in number of units, layout, amenities and location. This is why only sales from subject's neighborhood were chosen for the analysis.

All Respondent's sales included .08 acres of land, a small patio area, and an attached garage. Sale No. 1 involved a three (3) bedroom, two and one-half (2½) bathroom, 2,546 square foot, two (2) story residence. This property sold in January 2024 for \$660,000. Respondent adjusted first for time at .35% per month, then adjusted for difference in size, resulting in an adjusted sale price of \$659,938, or nearly \$286 per square foot. Sale No. 2 was another two (2) story unit with three (3) bedrooms, two and one-half (2½) bathrooms, and 1,980 square feet that sold in November 2023 for

\$668,000. Adjusting for time and size resulted in an adjusted sale price of \$737,829, or about \$320 per square foot. Sale No. 3 was the May 2024 purchase of a single-story unit comprised of 1,912 square feet, three (3) bedrooms, and two (2) bathrooms. Respondent adjusted for time, size, and bathroom count for an adjusted sale price of \$780,124, or about \$338 per square foot. For comparison, subject is assessed at \$719,200, or approximately \$312 per square foot.

Appellant disagreed Sale No. 1 was a valid comparable sale, as it occurred in 2023 and questioned Sale No. 3's comparability to subject since it is a single-story unit. According to Appellant, there are only a few single-story units in subject's neighborhood, and have a different level of demand than two (2) story units like subject.

Respondent noted reaching back into the last three (3) months of the prior year, 2023 in this case, is a common practice. Respondent emphasized all the sales were located in subject's subdivision which necessitated looking farther back in time. Respondent also acknowledged Sale No. 3 is a single-level unit, but highlighted subject is assessed \$60,000 less than the adjusted sale price. Regarding the statistics of townhome sale prices from 2023 to 2024 offered by Appellant, Respondent questioned the data and methodology used to arrive at the 2% decrease in price and opined that it was unclear in the document provided if only December sales in each year were used while the sales during the rest of the year were ignored. Respondent maintained subject's assessed value fell within the range of the comparable sales and was appropriate.

## 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. There are three (3) approaches to value: the sales comparison approach, the cost approach, and the income approach. *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 and considers the differences in property characteristics between subject and the sale properties.

Appellant did not develop a traditional appraisal model in this case. Rather, citing statistics from a regional realtor website that indicated a 2.2% decrease in the townhome market in Ada County, Appellant claimed not only should subject's assessment not have increased by 17%, but it should have decreased, and asked the

Board to modify the value accordingly. The Board understands Appellant's concerns in light of the statistics offered however, without any details of the sales used in the statistical analysis and an opportunity to examine how comparable those particular sales were to subject, it was difficult for the Board to afford these statistics much weight. Also, the cited statistics were developed using townhome sales across all of Ada County; there was nothing specific to subject's neighborhood or even the broader east Boise market.

Respondent, on the other hand, developed a traditional sales comparison analysis involving three (3) sales from subject's neighborhood. Each sale was first adjusted for time, and then for size and bathroom count. There was some concern, expressed by Appellant and shared by the Board, with Sale No. 3 being a single-story residence unlike subject's two (2) story design. In the Board's experience these two (2) types of properties are somewhat difficult to compare directly, as the former typically commands a higher price per square foot. That said, with few sales in subject's neighborhood, and the \$60,000 difference between subject's assessed value and the adjusted sale price of Sale No. 3, it is clear to the Board that Respondent recognized this difference. Further, even if Sale No. 3 was not considered, subject's assessed value sits between the adjusted sale prices of Sales No. 1 and 2, both of which were highly similar to subject.

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. In this instance, the burden was not met. Given the lack of any specific sales or details

concerning the statistics offered by Appellant, the Board finds no good cause to disturb the valuation.

FINAL ORDER

In accordance with the foregoing Final Decision, IT IS ORDERED that the decision of the Ada 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.