

BEFORE THE IDAHO BOARD OF TAX APPEALS

|                               |   |                          |
|-------------------------------|---|--------------------------|
| KEVIN AND CHRISTINA JEFFRIES, | ) |                          |
|                               | ) |                          |
| Appellants,                   | ) | APPEAL NO. 25-A-1111     |
|                               | ) |                          |
| v.                            | ) | FINAL DECISION AND ORDER |
|                               | ) |                          |
| BOISE COUNTY,                 | ) |                          |
|                               | ) |                          |
| Respondent.                   | ) |                          |
|                               | ) |                          |
| _____                         | ) |                          |

**RESIDENTIAL PROPERTY APPEAL**

This appeal is taken from a decision of the Boise County Board of Equalization denying an appeal of the valuation for taxing purposes on property described by Parcel No. RP054120010020. The appeal concerns the 2025 tax year.

This matter came on for hearing November 20, 2025, in Idaho City, Idaho, before Board Member Leland Heinrich. Appellants Kevin and Christina Jeffries were self-represented. Boise County Assessor Chris Juszczak 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 Boise County Board of Equalization is affirmed.**

FINDINGS OF FACT

The assessed land value is \$484,000, and the improvements' value is \$1,407,308, totaling \$1,891,308. Appellants contend the correct land value is \$410,000, and the improvements' value is \$1,256,412, totaling \$1,666,412.

The subject property is a 2.11 acre parcel located on the middle fork of the Payette River in Garden Valley, Idaho. The property is improved with a residence built in 2003

consisting of 5,298 square feet, five (5) bedrooms, four and one-half (4½) bathrooms, and a 1,156 square foot attached garage. The property is further improved with a 1,200 square foot detached garage built in 2019.

Appellants highlighted subject's assessment values since 2019 with changes ranging from an increase of more than 39% in 2021 to a reduction of nearly 23% in 2024 and questioned the validity of such volatile swings. Further, Appellants claimed Respondent valued subject property at a higher level of finish than is present and pointed out subject suffers from a couple notable detrimental factors not reflected in the valuation.

Regarding the level of finish, Appellants disagreed with Respondent's characterization of subject as having extensive custom log accents throughout. According to Appellants, subject has a significant amount of stucco for the exterior finish and only the front of the garage, a single bedroom wall, and the front entry area of the residence have any log-built construction details.

Turning to the detrimental factors, Appellants explained subject is bisected by a ravine that flows to the river, and during times of high water, access to the residence can be inhibited. Several years ago, when water flows were high, the culvert for the ravine was overwhelmed and access was cut off. Once the waters receded, Appellants had to replace the culvert. Secondly, subject does not have a septic or leach field. Rather, it has a "sewer pump lift station" where wastewater is pumped to an off-site leach field over 1,500 feet away. Appellants estimate this unique system would cost \$200,000 or more to replace, a concern top of mind as Appellants have already experienced a pump failure and a force main line break in the roughly twenty (20) year-old system. Appellants also shared the pump station was fixed near the beginning of 2025 for a cost of \$3,000 to

\$4,000, but could not recall the exact date or amount, and the drain field maintenance is shared by the three (3) properties that utilize it, though responsibility for it is not legally defined.

In support of a lower valuation, Appellants provided information from a real estate website about three (3) sales in subject's general area that took place between May 2023 and February 2025. Sale No. 1 regarded the May 2023 purchase of the property adjacent to subject for an estimated sale price of \$924,784. This two (2) acre parcel was improved with a 2,791 square foot residence with four (4) bedrooms, three (3) bathrooms, a three (3) car garage, and 300 feet of river frontage built in 2001. Sale No. 2 involved the January 2024 purchase of a 2.41 acre property with a 4,696 square foot five (5) bedroom, four (4) bathroom residence built in 1997 that also has river frontage. The amount of river frontage and the sale price were unclear in the record. Sale No. 3 concerned the February 2025 sale of a 2.45 acre property with a 1997-built 3,586 square foot three (3) bedroom, three and one-half (3½) bathroom residence. The latest list price was \$929,000 but the final sale price was unknown. In consideration of the above items, Appellants requested the Board reduce subject's assessment to \$1,666,412.

Respondent requested more detail about the sales provided by Appellants but Appellants were unable to obtain exact sale dates or prices. Appellants stated the sales were selected based on similarity to subject, but adjustments were not applied to the estimated prices to equalize them to subject.

In support of subject's valuation, Respondent provided two (2) comparable sale analyses: a bare land analysis and a residential sales analysis. The land sale analysis included the sale of three (3) vacant riverfront parcels. Sale No. 1 was the purchase of a

0.38 acre parcel for \$180,000 in July 2024. After applying a 1% per month time adjustment, Respondent arrived at an adjusted sale price of \$189,120. Sale No. 2 involved a 6.5 acre parcel that sold in August 2024 for \$550,000, with an adjusted sale price of \$574,750. Sale No. 3 regarded the purchase of an 8.97 acre parcel for \$715,000 in September 2024, with an adjusted raw land sale price of \$710,978 after removing \$30,000 for well and septic. Respondent then calculated the price rate for each sale, resulting in \$497,684, \$88,423, and \$79,262 per acre, respectively. For comparison, subject's land is assessed at \$210,427 per acre. Given that subject's land value is mid-range of the adjusted sales data, Respondent maintained it was reasonable.

When questioned about the sizable disparity between lot size, as well as the price per acre, of Sale No. 1 compared to the other two (2) land sales and why it was not considered an outlier, Respondent stated the market does not indicate that size is a factor in bare land sales, especially land with river frontage.

Next, Respondent provided an analysis of three (3) residential sales. Sale No. 1 regarded the June 2024 purchase of an 8.39 acre parcel improved with a 4,790 square foot two (2) story residence with an attached 826 square foot garage built in 2003. Respondent adjusted for location, as this sale was not a riverfront property, then for living area, bathroom and kitchen count, and outbuildings, among others, and calculated an adjusted sale price of \$2,077,864. Sale No. 2 involved the purchase of a 2.95 acre riverfront property improved with a 3,520 square foot one (1) story residence with a walkout basement built in 2008. The adjusted sale price was \$1,400,713. Sale No. 3 concerned the July 2024 purchase of a 16.48 acre parcel improved with a 3,284 square foot two (2) story residence with two (2) detached garages: one (1) with a 1,248 square

foot accessory dwelling unit and 1,408 square feet of garage space, and the other with 2,336 square feet of garage space as well as a 532 square foot carport. After adjustments, Respondent calculated an adjusted sale price of \$2,662,302. Respondent stated the average sale price of the comparable sales was \$2,046,960. Whereas subject is valued at \$1,891,308, Respondent maintained its assessment was fair and equitable.

Additionally, Respondent provided 2024 sale and assessment information on eight (8) improved properties to demonstrate the differences between the assessed values and sale price. The sale prices varied from the respective assessed values by -22.43% to 61.52% with an average of 14.16%. For reference, subject's assessed value increased by 13.5% from the prior year.

### 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.

Both parties provided sales information, which efforts were appreciated by the Board. However, there were some concerns. Firstly, in a broader view, Appellants admitted none of the sale prices or dates provided were verified. This is problematic because market value is based on actual sale prices, not estimates. The Board understands the difficulty in obtaining and verifying sale data in a non-disclosure state, such as Idaho. However, the existence of this hurdle does not exempt taxpayers or taxing authorities from using verified market data in determining market value.

Appellants Sale No. 1 was the 2023 purchase of the property adjacent to subject where significant condition issues were identified, including black mold, broken windows, and electrical and plumbing issues. Additionally, the residence was almost half the size of the subject property. Given that no verified sale price was provided, and no adjustments were made for differences between this sale and subject, the Board did not afford it any weight.

Also, Sale No. 3 was cited to have occurred in February 2025. The relevant valuation date in this case is January 1, 2025. Estimating the value of a property as of a particular date is necessarily dependent on sales and market data from prior to the date

of valuation, because information from beyond such date is unavailable to market participants at the time. The sale did not close until February 2025, which renders it untimely for purposes of establishing subject's market value on the assessment date.

Though Appellants were concerned the culvert in the middle of subject and the wastewater pump system could prove detrimental to subject in the future, there was no issue with either at the time of assessment. And without any market data or other value evidence indicating that a wastewater pump system or culvert negatively influence value, there is no basis for an adjustment.

Respondent provided two (2) separate sales analyses in support of subject's valuation; one (1) land value analysis and one (1) analysis for the whole property. In the land analysis, the Board found it noteworthy that Sale No. 1, a .38 acre parcel, carried a time-adjusted sale price per acre of \$497,684, where the other two sales, 6.5 and 8.97 acres respectively, had time-adjusted sale prices per acre of \$88,423 and \$79,262. Respondent stated the market indicates the first acre commands a higher price, and the price of remaining acreage diminishes sharply. Certainly, economies of scale indicate the smaller parcel would have a higher price per acre. However, the disparity of over \$400,000 per acre between Sale No. 1 and both of the other two (2) sales was significant. In the Board's view, even economies of scale and the first acre premium do not support a price rate difference that large, especially considering both of the larger parcels also had walk-in river frontage like subject. As such, the Board gave little weight to the bare land sales analysis.

Better received was Respondent's residential sales analysis in which Respondent provided information on three (3) recent sales and adjusted each for differences to

subject. It was not lost on the Board, however, that Sale Nos. 1 and 3 were a considerable distance from subject, ten (10) and five (5) miles respectively, and each required gross adjustments in excess of 64% and 43%, respectively. Sale No. 1 was also not a riverfront parcel. Even with the comparability of these sales somewhat in question, the sale data in Respondent's residential analysis were the only verified data in the record, and the adjusted sale prices bracketed subject's assessed value.

As the party bringing this appeal, Appellants bear the burden of proving error in subject's valuation by a preponderance of the evidence. Idaho Code § 63-511. In this instance, the burden has not been met. Without verified sales data, the Board is unable to meaningfully compare the subject property with the sales provided by Appellants. Without market support, the Board has no cause to disturb subject's valuation.

The decision of the Boise County Board of Equalization is affirmed.

#### FINAL ORDER

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

DATED this 30<sup>th</sup> day of January, 2026.