

BEFORE THE IDAHO BOARD OF TAX APPEALS

BRUCE VALLEJO,	)	
	)	
Appellant,	)	APPEAL NO. 25-A-1084
	)	
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. R1326110740. The appeal concerns the 2025 tax year.

This matter came on for hearing October 21, 2025, in Boise, Idaho, before Board Member Leland Heinrich. Appellant Bruce Vallejo was self-represented. Ada County Chief Deputy Assessor Brad Smith represented Respondent.

Board Members Leland Heinrich, 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 \$128,900, and the improvements' value is \$368,000, totaling \$496,900. Appellant contends the correct total value is \$455,000.

The subject property is a .16 acre residential parcel situated in the Cazador subdivision in Kuna, Idaho. The property is improved with a 1,766 square foot three (3)

bedroom, two (2) bathroom residence with an attached three (3) car garage constructed in 2020.

Appellant disagreed with subject's current assessed value and contended sales activity in the subdivision supported a lower valuation. In this regard, Appellant shared information on eight (8) sales which transpired during 2024. All the sale residences were three (3) bedroom, two (2) bathroom designs and ranged in finished living area from 1,627 to 1,817 square feet. Sale prices ranged from \$476,700 to \$511,877, with an average of \$486,209. Appellant did not directly compare the subject property to any of the sales but opined a value of \$455,000 was reasonable for subject.

Respondent explained subject's assessed value was trended for the current 2025 assessment year based on market activity in the neighborhood. Respondent noted the 8.85% increase in subject's value was typical for the subdivision, which saw increases from 8.53% to 19.61%.

In more direct support of subject's valuation, Respondent offered an analysis of three (3) sales from the subdivision, all of which were also included in Appellant's sales data. Sale No. 1 concerned a .12 acre lot improved with a 1,767 square foot residence constructed in 2019 which sold for \$511,000 in October 2024. Sale No. 2 was the February 2024 purchase of a 1,738 square foot residence constructed in 2023 situated on a .13 acre lot for \$479,000. Sale No. 3 was a .12 acre lot improved with a 1,817 square foot residence constructed in 2022 with a May 2024 sale price of \$487,000. The respective sale prices were first adjusted for date of sale to reflect pricing levels on January 1, 2025. Each sale property was then compared to subject, and adjustments were made for differences in finished living area, lot size, and garage square footage. The

result was adjusted sale prices of \$548,600, \$536,300, and \$534,300, respectively. By comparison, subject's assessed value is \$496,900, which Respondent viewed as reasonable against the adjusted price data.

Appellant questioned the comparability of the sales included in Respondent's analysis. According to Appellant, all the sale residences had upgraded kitchens and superior finishes compared to the subject residence and were therefore not comparable. Respondent acknowledged the sale residences had some upgraded features, however, pointed out subject is the only residence in the data set with a three (3) car attached garage. Subject was also noted to have a covered patio, an amenity absent in Sale Nos. 2 and 3. Respondent also stressed subject's assessed value is less than all the adjusted sale prices in the analysis, which recognizes subject does not have upgraded features.

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 three (3) primary approaches for determining market value include 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). Residential property is commonly valued using the sales comparison approach, which in basic terms compares recent sales of similar properties to the subject property and makes adjustments for differences in relevant property characteristics.

Both parties provided recent sales information in support of their respective value positions, which efforts were appreciated by the Board. While Appellant's data included a higher number of sales, no comparative analysis was attempted, nor were adjustments made for differences in property characteristics. It was not apparent to the Board how Appellant's value claim of \$455,000 for the subject property was determined, as the figure is more than \$20,000 below the lowest sale price in Appellant's data set and is also less than subject's 2024 assessed value. In other words, Appellant contended subject's value decreased over the last year, which runs contrary to market trends observed by Respondent. Interestingly, applying Respondent's 0.35% per month time adjustment to Appellant's sales yields an average time-adjusted sale price of roughly \$494,000, which approximates subject's \$496,900 assessed value.

Respondent's sales model was better received by the Board, as it adhered to accepted standards of appraisal. Admittedly there were some differences between subject and the sale properties, but appropriate appraisal adjustments were made. It was also not lost on the Board that subject enjoys some features absent in the sale properties, such as a three (3) car garage. In all, the Board found subject's current valuation

reasonable, particularly given that Respondent's analysis concluded adjusted sale prices from roughly \$534,000 to \$548,000.

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. The Board did not find the burden of proof satisfied in this instance. Though both parties offered ample sales data, Respondent's comparative sales model was found to represent the more thorough analysis and offered the more reliable indicator of subject's market value.

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

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 8th day of December, 2025.