

BEFORE THE IDAHO BOARD OF TAX APPEALS

LINDA AYMON,)	
)	
Appellant,)	APPEAL NO. 14-A-1060
)	
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 the protest of valuation for taxing purposes of property described by Parcel No. R0500570180. The appeal concerns the 2014 tax year.

This matter came on for hearing October 23, 2014 in Boise, Idaho before Hearing Officer Travis VanLith. Appellant Linda Aymon was self-represented. Chief Deputy Assessor Tim Tallman represented Respondent.

Board Members David Kinghorn, Linda Pike and Leland Heinrich participated in 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 \$66,200, and the improvements' valuation is \$177,300, totaling \$243,500. Appellant contends the correct land value is \$63,500, and the improvements' value is \$158,200, totaling \$221,700.

The subject property is a .20 acre lot improved with a 1,711 square foot residence built in 1998, and located in the Arants Plantation Creek Subdivision in Garden City, Idaho.

The residence includes three (3) bedrooms, two (2) bathrooms, and a 528 square foot attached garage.

Appellant purchased subject in June 2012 for \$203,000 in an arm's-length transaction. Appellant explained subject's assessed value increased 18% for the 2014 tax year while other properties in an adjacent subdivision increased approximately 9% and concluded subject was not assessed uniformly with other properties in the area. Appellant provided a spreadsheet depicting assessed values from 2005 to 2014 for several subdivisions.

Respondent characterized subject's area as one of the "hottest" market areas in Boise during 2013 and explained the median average 2013 increase in subject's general area was 17.4%. Respondent did an analysis on all the plantation area subdivisions near subject. Assessment history summaries were provided for each of the subdivisions.

In support of subject's assessed value, Respondent referenced three (3) 2013 improved residential sales located in close proximity to subject. The sale properties were described as being generally similar to subject. An appraisal worksheet compared differences between subject and the three (3) sales. After adjustments for time of sale, square footage, bathroom count, deck and patio area, garage size, location, and effective age, the indicated value for subject ranged from \$253,649 to \$289,672, or between \$148 and \$169 per square foot. The net adjustments to each sale fell between .4% and 21.6%. Subject is assessed at \$142 per square foot.

CONCLUSIONS OF LAW

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

Idaho Code § 63-205 requires taxable property be assessed at market value annually on January 1; January 1, 2014 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. Residential property like the subject is commonly valued using a sales comparison approach.

Appellant's value evidence centered on the assessed values of other properties in subject's general area. While the Board understands Appellant's concern with equal assessments, comparisons of assessed values is not a recognized appraisal approach. Further, we note Appellant was comparing assessed values of two-story houses to subject's single-level design. Typically, single-level residences are valued more per square foot than multi-level residences because they are more expensive to construct.

Respondent, on the other hand, presented a sales comparison approach. Three (3) improved residential sales were provided and the physical characteristics of each were detailed. Value adjustments were made for physical differences between the sale properties and subject. Adjusted sale prices were between \$148 and \$169 per square foot. Given this evidence, subject's assessed value rate of \$142 per square foot is supported.

In appeals to this Board, the burden is with the Appellant to establish subject's valuation is erroneous by a preponderance of the evidence. Idaho Code § 63-511. In this case, the Board does not find Appellant met the burden of proof. Respondent's value evidence was supportive of subject's current assessed value. Therefore, 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 24th day of February, 2015.