

**Order of the Thurston County
Board of Equalization**

Property Owner: TRACTOR SUPPLY COMPANY

Parcel Number(s): 64303200700

Assessment Year: 2018

Petition Number: 18-0467

Having considered the evidence presented by the parties in this appeal, the Board hereby:

☒ sustains ☐ overrules the determination of the assessor.

Assessor's True and Fair Value Determination

<input checked="" type="checkbox"/> Land	\$ 790,400
<input checked="" type="checkbox"/> Improvements	\$ 2,093,500
<input type="checkbox"/> Minerals	\$
<input type="checkbox"/> Personal Property	\$
TOTAL:	\$ 2,883,900

BOE True and Fair Value Determination

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<input checked="" type="checkbox"/> Improvements	\$ 2,093,500
<input type="checkbox"/> Minerals	\$
<input type="checkbox"/> Personal Property	\$
TOTAL:	\$ 2,883,900

This decision is based on our finding that: The Board sustains the Assessor's determination of value based on the testimony and evidence presented.

The Petitioner was represented by Ben Scott of Northwest Property Tax Consultants. The Petitioner's Representative stated his concerns regarding the Assessor's trending of cost valuations from year to year. Mr. Scott clarified that the trending is already included in the cost approach. Mr. Scott contends that RCW 84.48.150 requires the Assessor to provide information to the Petitioner. He cited *Pier 57 v. Pierce County* and the inference that information that is not provided by the Assessor would be unfavorable to the Assessor's arguments. Mr. Scott contended that the Assessor's comparable sales are: older than the subject property; are not located in the same neighborhood as the subject property; and support a lower value for the subject property.

The Assessor was represented by Commercial Appraiser, Teresa Hoyer, who provided a written Response including a market-adjusted cost approach, a sales comparison approach, and an income approach in support of the current assessed value. The Assessor's Representative contended that the Petitioner's Representative did not provide any evidence. Ms. Hoyer provided an explanation of the cost valuation process, and an explanation of the trending adjustments made to equalize values between the cost approach value and the sales to arrive at the final assessed value. She explained that this analysis is supported by the International Association of Assessing Officers, the Board of Tax Appeals, and the Washington State Department of Revenue. Ms. Hoyer noted that this Response is a review of the Assessor's commercial mass appraisal, and not an individual property appraisal.

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The Board finds that the Petitioner's Representative submitted no market evidence in support of his requested value. The Board concludes that the Petitioner did not provide clear, cogent, and convincing evidence sufficient to overcome the Assessor's presumption of correctness and to warrant a reduction in the valuation.

Dated this 15th day of January, 2019


John L. Morrison, Chairman


Ruth J. Elder, Clerk of the Board

NOTICE

This order can be appealed to the State Board of Tax Appeals by filing a notice of appeal with them at PO Box 40915, Olympia, WA 98504-0915 or at their website at bta.state.wa.us/appeal/forms.htm within thirty days of the date of mailing of this order. The Notice of Appeal form is available from either your county assessor or the State Board.

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Distribution: • Assessor • Petitioner • BOE File

REV 64 0058 (6/9/14)

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