

**Clark County Board of Equalization - Board Clerk's Record of Hearing**

**CASE BEING HEARD**

Assessment Year:	2023	Petition No:	859	Parcel Number:	58700-000
Owner Name:	RIDGEFIELD STORAGE INC				
Situs Address:	1705 THOMPSON AVE VANCOUVER, WA 98660				
Property Type:	warehouse	Acres:	9.75	NBHD	7780
Mailing Address:	20 WIGHT AVE SUITE 200 HUNT VALLEY, MD 21030				

**ATTENDANCE**

Held by:	<input checked="" type="checkbox"/> Video Conference	<input type="checkbox"/> Phone Conference	<input type="checkbox"/> In-Person
Board:	Taxpayer:	Assessor:	Third Parties (if any):
<input checked="" type="checkbox"/> Daniel Weaver <input checked="" type="checkbox"/> Lisa Bodner <input checked="" type="checkbox"/> John Marks	<input type="checkbox"/> John Rose <input type="checkbox"/> Terry Hagberg <input type="checkbox"/> Gloria Gomez-Matthews <input type="checkbox"/> Joel Cline	Travis Carlson	-

**HEARING SESSION**

Hearing Held On:	Start Time:	End Time:	Recording Name:
October 1, 2024	10/1/24 - 9:16	10/1/24 9:18	

**CASE DETAILS**

**TESTIMONY:** (See attached note sheet)

**APPELLANT EVIDENCE:** No detailed quantitative information was provided by the appellant for Board review.

**ASSESSOR EVIDENCE:** (NO ASSESSOR EVIDENCE)

**DECISION OF THE BOARD**

	ASSESSOR VALUE:	BOE VALUE:	DETERMINATION:	
LAND (ACRES)	\$ 1,992,705	\$ 1,992,705	<input checked="" type="checkbox"/> Sustained	<input type="checkbox"/> Appellant Analysis
IMPROVEMENTS	\$ 10,916,495	\$ 10,916,495	<input type="checkbox"/> Changed	<input type="checkbox"/> Assessor Recomdtn
PERSONAL PROPERTY	\$	\$	<input type="checkbox"/> _____	
<b>TOTAL</b>	<b>\$ 12,909,200</b>	<b>\$ 12,909,200</b>		
<b>NOTES:</b> <i>No timely information</i>			<input type="checkbox"/> Purchase	<input type="checkbox"/> Repairs
			<input type="checkbox"/> Appraisal	<input type="checkbox"/> Manfst Err.
			<input type="checkbox"/> Comps	<input type="checkbox"/> Other

**AUTHORIZATION**

Chairperson (or Authorized Designee) Signature	Date
<i>Daniel C. Weaver</i>	10/1/24

**Clark County Board of Equalization - Board Clerk's Record of Hearing**

**CASE BEING HEARD**

Assessment Year:	2023	Petition No:	862-972	Parcel Number:	SEE ATTACHMENT
Owner Name:	AE GREEN MOUNTAIN LLC				
Situs Address:	7155 N 90TH AVE CAMAS, WA 98607				
Property Type:	n/a	Acres:	0.04	NBHD	
Mailing Address:	203 SE PARK PLAZA DRIVE SUITE 230 VANCOUVER, WA 98684				

**ATTENDANCE**

Held by:	<input checked="" type="checkbox"/> Video Conference	<input type="checkbox"/> Phone Conference	<input type="checkbox"/> In-Person
Board:	Taxpayer:	Assessor:	Third Parties (if any):
<input checked="" type="checkbox"/> Daniel Weaver <input checked="" type="checkbox"/> Lisa Bodner <input checked="" type="checkbox"/> John Marks	<input type="checkbox"/> John Rose <input type="checkbox"/> Terry Hagberg <input type="checkbox"/> Gloria Gomez-Matthews <input type="checkbox"/> Joel Cline	Greg Lablanc	

**HEARING SESSION**

Hearing Held On:	Start Time:	End Time:	Recording Name:
October 1, 2024	10:04	10:40	

**CASE DETAILS**

**TESTIMONY:** (See attached note sheet)

**APPELLANT EVIDENCE:** The appellant's evidence included a comprehensive list of site development costs for a total of \$5,802,254 and an application and certificate for payment by Legacy 6 for construction costs for a total of \$3,013,259 as of May 2023. The appellant's evidence included an appraisal performed by Mark Skelte and Alan Hix Jr. of Western Realty Advisors indicating a raw land value of \$4,995,000 for the 7.89 acre site or \$45,000 per lot as of July 2023.

**ASSESSOR EVIDENCE:** The Assessor's evidence included a list of sales within the Green Mountain community and a list of sales in the Camas/Vancouver area, aerial photos of Thrive at Green Mountain's development, a map of the planned development phases of the community, and a cover letter recommending no change to the assessed value.

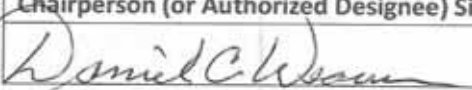
**DECISION OF THE BOARD**

	ASSESSOR VALUE:	BOE VALUE:	DETERMINATION:	
LAND (ACRES)	\$ SEE ATTACHMENT	\$ See	<input type="checkbox"/> Sustained <input checked="" type="checkbox"/> Changed <input type="checkbox"/> _____	<input checked="" type="checkbox"/> Appellant Analysis <input type="checkbox"/> Assessor Recomdtn
IMPROVEMENTS	\$ 0	\$ Attached		
PERSONAL PROPERTY	\$	\$ Schedules		
TOTAL	\$ SEE ATTACHMENT	\$ 111,351 / lot		

**NOTES:**  
 Free appraisal provides detail analysis of cost build up + profit on lots. Supported by the appellant analysis prepared by agent.

<input type="checkbox"/> Purchase	<input type="checkbox"/> Repairs
<input checked="" type="checkbox"/> Appraisal	<input type="checkbox"/> Manfst Err.
<input type="checkbox"/> Comps	<input type="checkbox"/> Other

**AUTHORIZATION**

Chairperson (or Authorized Designee) Signature	Date
	10/1/24

AE GREEN MOUNTAIN LLC				For values as of January 1st, 2023							
Property				Assessor Value			Appellant		BOE Value		
Property ID	Case	Location Address	Acres	Land	Improvements	TOTAL	Initial Estimate	Adjusted Estimate	Land	Improvements	TOTAL
986064-930	862	7155 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500	111,351		111,351
986064-931	863	7163 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-932	864	7175 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-933	865	7181 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-934	866	7197 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-935	867	7201 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-936	868	7215 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-937	869	7227 N 90TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-938	870	7233 N 90TH AVE	0.06	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-939	871	9015 N FAWN ST	0.06	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-940	872	9011 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-941	873	9005 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-942	874	9001 N FAWN ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-943	875	8995 N FAWN ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-944	876	8987 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-945	877	8981 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-946	878	8975 N FAWN ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-947	879	8961 N FAWN ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-948	880	8953 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-949	881	8947 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-950	882	8937 N FAWN ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-951	883	8923 N FAWN ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-952	884	8905 N FAWN ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-953	885	8902 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-954	886	8916 N FAWN ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-955	887	8936 N FAWN ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-956	888	8946 N FAWN ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-957	889	8952 N FAWN ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-958	890	8960 N FAWN ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-959	891	8978 N FAWN ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-960	892	8986 N FAWN ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-961	893	8989 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-962	894	8977 N EAGLET ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-963	895	8971 N EAGLET ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-964	896	8967 N EAGLET ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-965	897	8949 N EAGLET ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-966	898	8937 N EAGLET ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			

*Daniel C. Weaver 10/1/24*

AE GREEN MOUNTAIN LLC

For values as of January 1st, 2023

Property				Assessor Value			Appellant		BOE Value		
Property ID	Case	Location Address	Acres	Land	Improvements	TOTAL	Initial Estimate	Adjusted Estimate	Land	Improvements	TOTAL
986064-967	899	8931 N EAGLET ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500	111,351	-	111,351
986064-968	900	8915 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-969	901	8950 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-970	902	8968 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-971	903	8976 N EAGLET ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-972	904	8984 N EAGLET ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-973	905	8992 N EAGLET ST	0.09	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-980	906	8808 N EAGLET ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-981	907	8834 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-982	908	8862 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-983	909	8886 N EAGLET ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-984	910	8900 N EAGLET ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-985	911	8906 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-986	912	8926 N EAGLET ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-987	913	8934 N EAGLET ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-988	914	8942 N EAGLET ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-989	915	8991 N DOGWOOD ST	0.11	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-990	916	8983 N DOGWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-991	917	8975 N DOGWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-992	918	8971 N DOGWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-993	919	8965 N DOGWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-994	920	8957 N DOGWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-995	921	8951 N DOGWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-996	922	8945 N DOGWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-997	923	8939 N DOGWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-998	924	8933 N DOGWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986064-999	925	8901 N DOGWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-000	926	8893 N DOGWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-001	927	8865 N DOGWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-002	928	8831 N DOGWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-004	929	7025 N 89TH AVE	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-005	930	7021 N 89TH AVE	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-006	931	7019 N 89TH AVE	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-007	932	7017 N 89TH AVE	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-008	933	8921 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-009	934	8925 N COTTONWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			
986065-010	935	8935 N COTTONWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500			

*Daniel C. Weber 10/1/24*

AE GREEN MOUNTAIN LLC				For values as of January 1st, 2023								
Property				Assessor Value			Appellant		BOE Value			
Property ID	Case	Location Address	Acres	Land	Improvements	TOTAL	Initial Estimate	Adjusted Estimate	Land	Improvements	TOTAL	
986065-011	936	8943 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500	111,351		111,351	
986065-012	937	8955 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-013	938	8959 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-014	939	8963 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-015	940	8969 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-016	941	8973 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-017	942	8979 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-018	943	8985 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-019	944	8993 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-020	945	8997 N COTTONWOOD ST	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-021	946	8994 N COTTONWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-022	947	8988 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-023	948	8982 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-024	949	8980 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-025	950	8972 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-026	951	8964 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-027	952	8962 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-028	953	8956 N COTTONWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-029	954	8948 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-030	955	8944 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-031	956	8940 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-032	957	8932 N COTTONWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-033	958	8928 N COTTONWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-034	959	8922 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-035	960	8918 N COTTONWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-036	961	8898 N COTTONWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-037	962	8860 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-038	963	8832 N COTTONWOOD ST	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-039	964	8806 N COTTONWOOD ST	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-040	965	7002 N 89TH AVE	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-041	966	7006 N 89TH AVE	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-042	967	7010 N 89TH AVE	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-043	968	7014 N 89TH AVE	0.04	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-044	969	7018 N 89TH AVE	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-045	970	7022 N 89TH AVE	0.03	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-046	971	7026 N 89TH AVE	0.05	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				
986065-003	972	8803 N DOGWOOD ST	0.06	\$ 150,000	\$ -	\$ 150,000	\$ 65,646	\$ 102,500				

*Daniel C. Weam 10/1/24*

Owner	PID	Case	ADDRESS (Mail)	ATD?	NOTES
RIDGEFIELD STORAGE INC	58700-000	859	20 WIGHT AVE SUITE 200	Travis Carlson	The appellant's agent requested to reschedule the hearing. He submitted evidence on 9/30/24, and it was considered an untimely submission so it could not be reviewed by the Board of Equalization. The agent stated he did not receive evidence from the Assessor's Office.
AE GREEN MOUNTAIN LLC	986064-930	862- 972	203 SE PARK PLAZA DRIVE SUITE 230	Greg LeBlanc	<p>The agent stated the subject properties are 111 townhome lots in Camas across 7.89 acres. The lots were completed as of July 31, 2023, but no vertical construction on the townhome improvements had started at that time. The lots range from 1,300 square feet to 1,770 square feet. The owner purchased the subject property and an adjacent parcel for \$2,700,000 in February 2018. The appellant's appraisal reported the raw land value as \$4,995,000. In the appraisal, costs to date of \$6,698,492 and a profit incentive of 10% or \$669,849 were added to the raw land value, resulting in a total fee simple value of \$12,363,341. The property owner reported the site development costs should be \$5,802,254 with a profit incentive of \$580,226 for a total of \$11,377,481 or \$102,500 per parcel. The appellant submitted a report of these site development costs and information from the general contractor to support their opinion of value.</p> <p>The agent stated that the Assessor's Office's comparable sales were finished townhomes which are not directly comparable to land parcels. He believes this collection of sales also fails to consider holding costs associated with developing the site with improvements.</p>