

# Comanche Central Appraisal District 2025–2026 Reappraisal Plan

**\*\*Disclaimer\*\*** The Comanche CAD reserves the right to modify this Reappraisal Plan as needed to meet the requirements of the tax code.

## INTRODUCTION

### General Overview of Tax Code Requirement

Passage of Senate Bill 1652 in 2005 amended the Property Tax Code to require each Appraisal District to prepare a biennial reappraisal plan. The following details the Tax Code requirements:

### The Written Plan

Section 6.05, Property Tax Code, is amended by adding Subsection (i) to read as follows:

(i) To ensure adherence with generally accepted appraisal practices, the board of directors of an appraisal district shall develop biennially a written plan for the periodic reappraisal of all property within the boundaries of the district according to the requirements of Section 25.18 and shall hold a public hearing to consider the proposed plan. Not later than the 10th day before the date of the hearing, the secretary of the board shall deliver to the presiding officer of the governing body of each taxing unit participating in the district a written notice of the date, time, and place of the hearing. Not later than September 15 of each even numbered year, the board shall complete its hearing, make any amendments, and by resolution finally approve the plan. Copies of the approved plan shall be distributed to the presiding officer of the governing body of each taxing unit participating in the district and to the comptroller within 60 days of the approval date.

### Plan for Periodic Reappraisal

Subsections (a) and (b), Section 25.18, Property Tax Code, are amended to read as follows:

- a) Each appraisal office shall implement the plan for periodic reappraisal of property approved by the board of directors under Section 6.05(i).
- b) The plan shall provide for the following reappraisal activities for all real and personal property in the district at least once every three years:
  - 1) Identifying properties to be appraised through physical inspection or by other reliable means of identification, including deeds or other legal documentation, aerial photographs, land-based photographs, surveys, maps, and property sketches.
  - 2) Identifying and updating relevant characteristics of each property in the appraisal records.
  - 3) Defining market areas in the district.
  - 4) Identifying property characteristics that affect property value in each market area, including:
    - a) The location and market area of the property.
    - b) Physical attributes of the property, such as size, age, and condition.
    - c) Legal and economic attributes; and
    - d) Easements, covenants, leases, reservations, contracts, declarations, special assessments; ordinances, or legal restrictions.
  - 5) Developing an appraisal model that reflects the relationship among the property characteristics affecting value in each market area and determines the contribution of individual property characteristics.
  - 6) Applying the conclusions reflected in the model to the characteristics of the properties being appraised; and
  - 7) Reviewing the appraisal results to determine value.

## **Scope of Responsibility**

The Comanche Central Appraisal District has prepared and published this reappraisal plan and appraisal report to provide our Board of Directors, citizens, and taxpayers with a better understanding of the district's responsibilities and activities. This report has several parts: a general introduction and several sections describing the appraisal effort by the appraisal district.

The Comanche Central Appraisal District (CAD) is a political subdivision of the State of Texas created effective January 1, 1980. The provisions of the Texas Property Tax Code govern the legal, statutory, and administrative requirements of the appraisal district. A member Board of Directors, appointed by the taxing units within the boundaries of Comanche County, constitutes the district's governing body. The chief appraiser, appointed by the Board of Directors, is the chief administrator and chief executive officer of the appraisal district.

The appraisal district is responsible for local property tax appraisal and exemption administration for 21 jurisdictions or taxing units in the county. Each taxing unit, such as the county, city, school district, hospital district, water district, etc., sets its own tax rate to generate revenue to pay for such things as police and fire protection, public schools, road and street maintenance, courts, water and sewer systems, and other public services. Property appraisals and estimated values by the appraisal district allocate the year's tax burden on the basis of each taxable property's market value. We also determine eligibility for various types of property tax exemptions such as those for homeowners, the elderly, disabled veterans, charitable or religious organizations and agricultural productivity valuation.

**Except as provided by the Texas Property Tax Code, all taxable property is appraised at its "market value" as of January 1st. Under the tax code, "market value" means the price at which a property would transfer for cash or its equivalent under prevailing market conditions if:**

- exposed for sale in the open market with a reasonable time for the seller to find a purchaser;
- both the seller and the buyer know of all the uses and purposes to which the property is adapted and for which it is capable of being used and of the enforceable restrictions on its use, and;
- both the seller and buyer seek to maximize their gains and neither is in a position to take advantage of the exigencies of the other.

The Texas Property Tax Code defines special appraisal provisions for the valuation of residential homestead property (Sec. 23.23), productivity (Sec. 23.41), real property inventory (Sec. 23.12), dealer inventory (Sec. 23.121, 23.124, 23.1241 and 23.127), nominal (Sec. 23.18) or restricted use properties (Sec. 23.83) and allocation of interstate property (Sec. 23.03). The owner of real property inventory may elect to have the inventory appraised at its market value as of September 1st of the preceding year for the current appraisal year by filing an application with the chief appraiser requesting that the inventory be appraised as of September 1<sup>st</sup>.

The Texas Property Tax Code, under Sec. 25.18, requires each appraisal office to implement a plan to update appraised values for real property at least once every three years. Appraised values are reviewed annually and are subject to change. Business personal properties, minerals and utility properties are appraised every year.

The appraised value of real estate is calculated using specific information about each property. Using computer-assisted mass appraisal programs, and recognized appraisal methods and techniques, that information is compared with the data for similar properties, and with recent cost and market data. The district follows the standards of the International Association of Assessing Officers (IAAO) regarding its appraisal

practices and procedures and subscribes to the standards promulgated by the Appraisal Foundation known as the Uniform Standards of Professional Appraisal Practice (USPAP) to the extent they are applicable.

## Overview of District Operations

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### 2025 – 2026 Proposed Calendar of Key Events (See Appendix A)

#### Personnel Resources

The office of the Chief Appraiser is primarily responsible for overall planning, organizing, staffing, coordinating, and controlling of district operations. The administration department's function is to plan, organize, direct, and control the business support functions related to human resources, budget, finance, records management, purchasing, fixed assets, facilities, and postal services. The appraisal department is responsible for the valuation of all real and personal property accounts. The property types appraised include commercial, residential, and business personal accounts. Mineral, utilities, and industrial accounts are appraised by an outside appraisal firm. The district's appraisers are subject to the provisions of the Property Taxation Professional Certification Act and must be registered with the Texas Department of Licensing and Regulation. Support functions including records maintenance, information and assistance to property owners, and hearings are coordinated by personnel in support services.

The appraisal district staff consists of 8 employees with the following classifications:

- 2 - Official/Administrator (executive level administration)
- 2 - Professional (supervisory and management)
- 2 - Technicians (appraisers, program appraisers and network support)
- 2 - Administrative Support (professional, customer service, clerical and other)
- Oil, gas, utilities, railroad, industrial real & industrial BPP are appraised by Thomas Y Pickett

#### Staff Education and Training

All personnel that are performing appraisal work are registered with the Texas Department of Licensing and Regulation and are required to take appraisal courses to achieve the status of Registered Professional Appraiser (RPA) within five years of employment as an appraiser. After they are awarded their license, RPAs require 30 CEUs every two years. The Ethics course, Law & Rules Update and USPAP events must be completed as part of the 30 CEUs. Failure to meet these minimum standards results in the termination of the employee.

Additionally, all appraisal personnel receive extensive training in data gathering and statistical analyses of all types of property to ensure equality and uniformity of appraisal of all types of property. On-the-job training is delivered by department managers for new appraisers and managers introduce new procedures and regularly monitor appraisal activity to ensure that standardized appraisal procedures are being followed by all personnel.

#### Data

The district is responsible for establishing and maintaining approximately 20,356 real and personal property accounts covering 951 square miles within Comanche County. Overlapping school district taxing jurisdictions that are located in Comanche County include Blanket, May, Zephyr, Dublin, Lingleville, Gorman, Rising Star,

Hamilton, Hico, Priddy and Mullin. This data includes property characteristics, ownership, and exemption information. Property characteristic data on new construction is updated through an annual field effort; existing property data is maintained through a field review. Sales are routinely validated during a separate field effort; however, numerous sales are validated as part of the new construction and field inspections. General trends in employment, interest rates, new construction trends and cost and market data are acquired through various sources, including internally generated questionnaires to buyers and sellers, realtors, lenders and building contractors.

The district has a geographic information system (GIS) that maintains cadastral maps and various layers of data and aerial photography. The district makes property records available for public access via the Internet on the CCAD website.

### **Information Systems**

The System Administrator and our IT Company manage and maintain the district's data processing facility, software applications and geographical information system. This is a client/server-based environment, running Windows 2003 Server and SQL 2005 Server on a Dell Power Edge 2900 server. True Automation, Inc. provides software services for appraisal and applications.

### **Market Areas**

While the development of neighborhoods and their market analysis is described under Neighborhood and Market Analysis, the general market areas for Comanche County are:

1. **Zone 2 or Comanche ISD:** Consists of the City of Comanche, communities of Hasse, Proctor and Newburg, Proctor Lake subdivisions, Mercers Preserve, the remaining rural properties and the over-lapping school district of Dublin, Mullin, Priddy and Zephyr.
2. **Zone 1 or De Leon ISD:** Consists of the City of De Leon, communities of Downing and Sipe Springs, Proctor Lake subdivisions, Nabors Lake, the remaining rural properties, and the over-lapping school districts of Gorman and Lingleville.
3. **Zone 3 or Gustine ISD:** Consists of the City of Gustine, Lamkin Community, the remaining rural properties, and the over-lapping school districts of Hamilton and Hico.
4. **Zone 3 or Sidney ISD:** Consists of the Sidney Community, the remaining rural properties and the over-lapping school districts of Blanket, May, and Rising Star.

The appraiser upon review of the properties within these areas may further subdivide some of these areas into neighborhoods or subdivisions sharing physical or geographical boundaries, or legal restrictions in order to be as equal and uniform as possible.

### **Ratio Studies**

Market sales are examined to confirm which areas are similar for neighborhood development of commercial & residential. Land is subdivided within the school district into neighborhoods of small tract vacant or improved (20.00 acres and less), ag land vacant or improved (20.01 acres and larger) and lake lots vacant or improved. Land is further evaluated based on state codes D1, D2, & E1 and residential on state code A1.

The CCAD has customized reports in PACS for sales ratio studies with specific criteria for the different types of properties. This allows for quicker and easier analysis of the sales ratio study and adjustments.

Overall sales ratios are generated by school and sale type four times annually to allow appraisers to review general market trends. The ratio study lists all sales with prices broken down by school districts and sale type code and then listed in sales ratio order. In many cases, field checks may be conducted to ensure the ratios produced are accurate and the appraised values utilized are based on accurate property data characteristics. These ratio studies aid the appraisers by providing an indication of market activity by economic area or

changing market conditions (appreciation or depreciation). After analysis is completed, the report is filed in the Field Ratio Report binder.

After all sales have been verified and data entry is complete, a preliminary ratio study will be performed. Once the sample size is perfected, then decisions must be made using the data to adjust market value for Appraisal Notices. The median and co-efficient of dispersion will also be calculated.

### Reports

The preliminary sales ratio report along with the final report for each property type in the CAD is kept and filed in the Evidence File for that year and kept as long as administrative valuable.

### **Independent Performance Test**

According to Chapter 5 of the TPTC and Section 403.302 of the Texas Government Code, the State Comptroller's Property Tax Division (PTD) conducts a biennial property value study (PVS) of each Texas school district and each appraisal district. As part of this biennial study, the code requires the Comptroller to: use sales and recognized auditing and sampling techniques; review each appraisal district's appraisal methods, standards and procedures to determine whether the district used recognized standards and practices (MSP review); test the validity of school district taxable values in each appraisal district and presume the appraisal roll values are correct when values are valid; and, determine the level and uniformity of property tax appraisal in each appraisal district. The methodology used in the property value study includes stratified samples to improve sample representativeness and techniques or procedures of measuring uniformity. This study utilizes statistical analyses of sold properties (sale ratio studies) and appraisals of unsold properties (appraisal ratio studies) as a basis for assessment ratio reporting. For appraisal districts, the reported measures include median level of appraisal, coefficient of dispersion (COD), the percentage of properties within 10% of the median, the percentage of properties within 25% of the median and price-related differential (PRD) for properties overall and by state category.

There are 15 independent school districts in Comanche CAD for which appraisal rolls are annually developed. The preliminary results of this study are released January 31 in the year following the year of appraisement. The final results of this study are certified to the Education Commissioner of the Texas Education Agency (TEA) the following July of each year. This outside (third party) ratio study provides additional assistance to the CAD in determining areas of market activity or changing market conditions.

## Appraisal Activities

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### Appraisal Responsibilities

The field appraisal staff is responsible for collecting and maintaining property characteristic data for classification, valuation, and other purposes. Accurate valuation of real and personal property by any method requires a comprehensive physical description of personal property, and of land and building characteristics. This appraisal activity is responsible for administering, planning, and coordinating all activities involving data collection and maintenance of all commercial, residential, and personal property types located within the boundaries of Comanche County and the jurisdictions of this appraisal district. The data collection effort involves the field inspection of real and personal property accounts, as well as data entry of all data collected into the existing information system. The goal is to periodically field inspect residential, commercial, and personal property properties in the district every three years. Partial-completed and new construction improvements are inspected every year. The appraisal opinion of value for all property located in the district is reviewed and evaluated each year.

### Appraisal Resources

- **Personnel** - 5 appraisers conduct the appraisal activities.
- **Data** - The data used by field appraisers includes the existing property characteristic information contained in CAMA (Computer Assisted Mass Appraisal System) from the district's computer system. The data is printed on a property record card (PRD), or personal property data sheets. Other data used includes maps, sales data, fire, and damage reports, building permits, sewer and electric permits, mechanic liens filed at county courthouse, photos and actual cost and market information. Sources of information are gathered using excellent reciprocal relationships with other participants in the real estate marketplace. The district cultivates sources and gathers information from both buyers and sellers participating in the real estate market.

### Appraisal Frequency

#### **Comanche Appraisal District has adopted a triennial reappraisal cycle.**

For reappraisal or inspection purposes, the district is divided into three sections: Comanche ISD, De Leon ISD and Gustine/Sidney ISD. This allows for a complete drive-out of the county every three years.

- **2025 De Leon ISD:** Consists of the City of De Leon, communities of Downing and Sipe Springs, Proctor Lake subdivisions, Nabors Lake, and the remaining rural properties. During this inspection cycle, the over-lapping school districts of Dublin, Lingleville, Gorman and Rising Star are included.

- **2026 Comanche ISD:** Consists of the communities of Hasse, Proctor and Newburg, Proctor Lake subdivisions, Mercers Preserve, and the remaining rural properties. During this inspection cycle, the over-lapping school districts of Priddy, Mullin and Zephyr are included.
- **2027 City of Comanche & Gustine/Sidney ISDs:** Consists of the City of Comanche, City of Gustine, communities of Lamkin and Sidney, and the remaining rural properties. During this inspection cycle, the over-lapping districts of Blanket, May, Hamilton and Hico are included.

## Method Summary

**Residential property** - Residential property is physically examined every three years with appraisers driving in front of each home, noting condition of the improvement, and looking for changes that might have occurred to the property since the last on-site check. If needed, appraisers will make a walk-around the home. Exterior pictures are taken of homes until completed throughout the district. Real estate accounts are analyzed against sales of similar properties in Comanche CAD. Each neighborhood is statistically analyzed annually to ensure that sales that have occurred in the school district during the past 12 months are within a + or - 5% range of appraised value. If the sales indicate that range adjustments need to be made to the neighborhood it is done using a process outlined in detail in the Residential Appraisal section of this report.

**Commercial Property** - Commercial real estate is observed every three years to verify class and condition. The inspection occurs during the routine drive-out. Pictures are taken of the improvements until completed throughout the district. Real estate accounts are analyzed against sales of comparable properties in Comanche CAD. The income approach to value is also utilized to appraise commercial properties such as apartment complexes and storage buildings.

**Business Personal Property** - Business personal property is observed during the normal reappraisal cycle with appraisers actually going into businesses to develop quality and density observations. A rendition is left for new businesses to complete. Similar businesses to a subject are analyzed annually to determine consistency of appraisal per square foot. Businesses are categorized using SIC codes. Rendition laws provide additional information on which to base the values of all BPP accounts.

**Oil and Gas Property, Utility, Railroad and Pipeline Property, Industrial and Industrial Personal Property** – Comanche CAD has a professional services contract with Thomas Y Pickett (TYP) to annually appraise these properties.

## Data Collection/Validation

Data collection of real property involves maintaining data characteristics of the property on CAMA (Computer Assisted Mass Appraisal). The information contained in CAMA includes site characteristics, such as land size and topography, and improvement data, such as square foot of living area, year built, quality of construction, and condition. Field appraisers are required to use a property classification system that establishes uniform procedures for the correct listing of real property. All properties are coded according to a classification system. The approaches to value are structured and calibrated based on this coding system and property description and characteristics. The field appraisers use property classification references during their initial training and as a guide in the field inspection of properties. Data collection for personal property involves maintaining information on software designed to record and appraise business personal property. The type of information contained in the BPP file includes personal property such as business inventory, furniture and fixtures, machinery and equipment, with details such as cost and location. The field appraisers conducting on-site inspections use a personal property inspection report as a guide to correctly list all personal property that is taxable.

## **Sources of Data**

The sources of data collection are through property inspection, new construction field effort, data review/re-list field effort, data mailer questionnaires, hearings, sales validation field effort, commercial sales verification and field effort, newspapers and publications, and property owner correspondence by mail or via the Internet. A principal source of data comes from building permits received from the county clerk's office. Permits are received and matched manually with the property's tax account number for data entry. Area and regional real estate brokers and managers are also sources of market and property information. Data surveys of property owners requesting market information and property description information are also valuable data. Agricultural surveys of farming and ranching property owners and industry professionals are helpful for productivity value calibration. The Texas Railroad Commission is the source for mineral production data and leasing information. Capital market information is available from Ibbotson's SBBI Valuation Edition and Wall Street Journal, Value Line Investment Survey, and the Oil and Gas Journal. Improvement cost information is gathered from local building contractors and Marshall and Swift Valuation Service. Various income and rental surveys are performed by interviewing property managers and operators to determine operating income and expenses for investment and income producing real property.

Data review of entire neighborhoods is generally a good source for data collection. Appraisers drive through entire neighborhoods to review the accuracy of our data and identify properties that have to be re-listed. The sales validation effort in real property pertains to the collection of market data for properties that have sold. In residential, the sales validation effort involves on-site inspection by field appraisers to verify the accuracy of the property characteristics and confirmation of the sales price. In commercial, the staff appraisers are responsible for contacting sales participants to confirm sales prices and to verify pertinent data.

Property owners are one of the best sources for identifying incorrect data that generates a field check. Frequently, the property owner provides reliable data to allow correction of records without having to send an appraiser on-site. As the amount of information available on the Internet has increased, property owners have the opportunity to review information on their property and contact the appraisal district with any corrections. For the property owner without access to the Internet, letters are sometimes submitted notifying the district of inaccurate data. Properties identified in this manner are added to a work file and inspected at the earliest opportunity. Accuracy and validity in property descriptions and characteristics data is the highest goal and is stressed throughout the appraisal process from year to year. Appraisal opinion quality and validity relies on data accuracy as its foundation.

## **Data Collection Procedures**

The appraisers are assigned specific areas throughout the district to conduct field inspections. Appraisers of real estate and business personal property conduct field inspections and record information using field property cards that hold all data dealing with the property and allow for the entry of corrections and additions that the appraiser may find in his or her field inspection.

The quality of the data used is extremely important in estimating market values of taxable property. While work performance standards are established and upheld for the various field activities, quality of data is emphasized as the goal and responsibility of each appraiser. New appraisers are trained in the specifics of data collection and the classification system set forth and recognized as "rules" to follow. Experienced appraisers are routinely re-trained in listing procedures prior to major field projects such as new construction, sales validation, or data review. A quality assurance process exists through supervisory review of the work being performed by the field appraisers.

## **Data Maintenance**

The field appraiser is responsible for the accuracy of his/her fieldwork into the computer file. This responsibility includes not only data entry, but also quality assurance. The majority of the data collected in the

field is input by clerical staff with supervision by the field appraiser. Data updates and file modification for property descriptions and input accuracy is conducted as the responsibility of the field appraiser and appraisal supervisors.

## **INDIVIDUAL VALUE REVIEW PROCEDURES**

### **Field Review**

The date of last inspection and the CAD appraiser responsible are listed on the property card. If a property owner or jurisdiction disputes the district's records concerning this data during a hearing, via a telephone call or other correspondence received, the record may be corrected based on the evidence provided or an on-site inspection may be conducted. Typically, a field inspection is requested to verify this information for the current year's valuation or for the next year's valuation. Every year a field review of real property & personal property, with available situs, located in certain areas or neighborhoods in the jurisdiction is done during the data review/re-list field effort.

### **OFFICE REVIEW**

Office reviews are completed on properties where updated information has been received from the owner of the property and is considered accurate and correct. Data mailers, sent in mass, or at the request of the property owner, frequently verify some property characteristics or current condition of the property. When the property data is verified in this manner, and considered accurate and correct, field inspections may not be required. The personal property department mails property rendition forms in January of each year to assist in the annual review of the property.

### **PERFORMANCE TEST**

The property appraisers are responsible for conducting ratio studies and comparative analysis. Ratio studies are conducted on property located within certain neighborhoods or districts by appraisal staff. The sale ratio and comparative analysis of sale property to appraised property forms the basis for determining the level of appraisal and market influences and factors for the neighborhood. This information is the basis for updating property valuation for the entire area of property to be evaluated. Field appraisers, in many cases, may conduct field inspections to ensure the accuracy of the property descriptions at the time of sale for this study. This inspection is to ensure that the ratios produced are accurate for the property sold and that appraised values utilized in the study are based on accurate property data characteristics observed at the time of sale. Also, property inspections are performed to discover if property characteristics had changed as of the sale date or subsequent to the sale date. Sale ratios should be based on the value of the property as of the date of sale not after a subsequent or substantial change was made to the property after the negotiation and agreement in price was concluded. Properly performed ratio studies are a good reflection of the level of appraisal for the district.

# Residential Valuation Process

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## INTRODUCTION

### Appraisal Responsibility

This mass appraisal assignment includes all the residential described real property which falls within the responsibility of the residential valuation appraisers of the Comanche Central Appraisal District and located within the boundaries of this taxing jurisdiction.

### Scope of Responsibility

The appraisers are responsible for estimating equal and uniform market values for residential improved and vacant property and multiple family parcels in Comanche County and adjoining over-lapping jurisdictional areas.

### Appraisal Resources

- **Personnel** - The appraisal staff consists of 5 appraisers. The following appraisers are responsible for estimating the market value of residential property:

**Jo Ann Hohertz, Chief Appraiser**

**Sandra Garcia, Deputy Appraiser & Personal Property Appraiser**

**Sandy Steward, Appraisal Director**

**Tawney Aldape, Appraiser**

**Tim Matthews, Appraiser**

**Richard Petree, Western Valuation, Consultant**

- **Data** - An individualized set of data characteristics for each residential dwelling and multiple family units in this district are collected in the field and data entered into the computer. The property characteristic data drives the application of computer-assisted mass appraisal (CAMA) under the Cost, Market, and Income Approaches to property valuation.

## VALUATION APPROACH

### Land Analysis

Residential land valuation analysis is conducted prior to neighborhood sales analysis. The value of the land component to the property is estimated based on available market sales for comparable and competing land under similar usage. A comparison and analysis of comparable land sales is conducted based on a comparison of land characteristics found to influence the market price of land located in the neighborhood. A computerized land table file stores the land information required to consistently value individual parcels within neighborhoods given known land characteristics. Specific land influences are considered, where necessary, and depending on neighborhood and individual lot or tract characteristics, to adjust parcels outside the neighborhood norm. The appraisers use abstraction and allocation methods to insure that estimated land values best reflect the contributory market value of the land to the overall property value.

### Area Analysis

Data on regional economic forces such as demographic patterns, regional location factors, employment and income patterns, general trends in real property prices and rents, interest rate trends, availability of vacant land, and construction trends and costs are collected from private vendors and public sources and provide the

field appraiser a current economic outlook on the real estate market. Information is gleaned from real estate publications and sources such as continuing education in the form of TDLR classes.

### **Neighborhood and Market Analysis**

Neighborhood analysis involves the examination of how physical, economic, governmental, and social forces and other influences affect property values. The effects of these forces are also used to identify, classify, and stratify comparable properties into smaller, manageable subsets of the universe of properties known as neighborhoods. Residential valuation and neighborhood analysis is conducted on various market areas within each of the political entities known as Independent School Districts (ISD). Analysis of comparable market sales forms the basis of estimating market activity and the level of supply and demand affecting market prices for any given market area, neighborhood, or district. Market sales indicate the effects of these market forces and are interpreted by the appraiser into an indication of market price ranges and indications of property component change considering a given time period relative to the date of appraisal. Cost and Market Approaches to estimate value are the basic techniques utilized to interpret these sales. For multiple family properties the Income Approach to value may be utilized to estimate an opinion of value for investment level residential property.

The first step in neighborhood analysis is the identification of a group of properties that share certain common traits. A "neighborhood" for analysis purposes is defined as the largest geographic grouping of properties where the property's physical, economic, governmental, and social forces are generally similar and uniform. Geographic stratification accommodates the local supply and demand factors that vary across a jurisdiction. Once a neighborhood with similar characteristics has been identified, the next step is to define its boundaries. This process is known as "delineation". Some factors used in neighborhood delineation include location, sales price range, lot size, age of dwelling, quality of construction and condition of dwellings, square footage of living area, and story height. Delineation can involve the physical drawing of neighborhood boundary lines on a map, but it can also involve statistical separation or stratification based on attribute analysis. Part of neighborhood analysis is the consideration of discernible patterns of growth that influence a neighborhood's individual market. Few neighborhoods are fixed in character. Each neighborhood may be characterized as being in a stage of growth, stability, or decline. The growth period is a time of development and construction. As new neighborhoods in a community are developed, they compete with existing neighborhoods. An added supply of new homes tends to induce population shift from older homes to newer homes. In the period of stability, or equilibrium, the forces of supply and demand are about equal. Generally, in the stage of equilibrium, older neighborhoods can be more desirable due to their stability of residential character and proximity to the workplace and other community facilities. The period of decline reflects diminishing demand or desirability. During decline, general property use may change from residential to a mix of residential and commercial uses. Declining neighborhoods may also experience renewal, reorganization, rebuilding, or restoration, which promotes increased demand and economic desirability.

Neighborhood identification and delineation is the cornerstone of the residential valuation system at the district. All the residential analysis work done in association with the residential valuation process is neighborhood specific. Neighborhoods are field inspected and delineated based on observable aspects of homogeneity (quality of being uniform). Neighborhood delineation is periodically reviewed to determine if further neighborhood delineation is warranted. Whereas neighborhoods involve similar properties in the same location, a neighborhood group is simply defined as similar neighborhoods in similar locations. Each residential neighborhood is assigned to a neighborhood group based on observable aspects of homogeneity between neighborhoods. Neighborhood grouping is highly beneficial in cost-derived areas of limited or no sales or use in direct sales comparison analysis. Neighborhood groups, or clustered neighborhoods, increase the available market data by linking comparable properties outside a given neighborhood. Sales ratio analysis, discussed below, is performed on a neighborhood basis, and in soft sale areas on a neighborhood group basis.

### **Highest and Best Use Analysis**

The highest and best use of property is the reasonable and probable use that supports the highest present value as of the date of the appraisal. The highest and best use must be physically possible, legal, financially feasible, and productive to its maximum. The highest and best use of residential property is normally its current use. This is due in part to the fact that residential development, in many areas, through use of deed restrictions and zoning, precludes other land uses. Residential valuation undertakes reassessment of highest and best use in transition areas and areas of mixed residential and commercial use. Once the conclusion is made that the highest and best use remains residential, further highest, and best use analysis is done to decide the type of residential use on a neighborhood basis. As an example, it may be determined in a transition area that older, non-remodeled homes are not the most productive and the highest and best use of such property is the construction of new dwellings. In areas of mixed residential and commercial use, the appraiser reviews properties in these areas on a periodic basis to determine if changes in the real estate market require reassessment of the highest and best use of a select population of properties.

## **VALUATION AND STATISTICAL ANALYSIS (Model Calibration)**

### **Cost Schedules**

All residential parcels in the district are valued with a replacement cost estimated from cost schedules based on the improvement classification system using a comparative unit method. The district's residential cost schedules are estimated from Marshall and Swift, a nationally recognized cost estimator service. These cost estimates are compared with sales of new improvements and evaluated from year to year and indexed to reflect the local residential building and labor market. Costs may also be indexed for neighborhood factors and influences that affect the total replacement cost of the improvements in a smaller market area based on evidence taken from a sample of market sales. The cost schedules are reviewed regularly as a result of recent state legislation requiring that the appraisal district cost schedules be within a range of plus or minus 10% from nationally recognized cost schedules.

A review of the residential cost schedule is performed annually. As part of this review and evaluation process of the estimated replacement cost, newly constructed sold properties representing various levels of quality of construction in the district are considered. The property data characteristics of these properties are verified, and photographs are taken of the samples. CAD replacement costs are compared against Marshall & Swift, a nationally recognized cost estimator, and the indicated replacement cost abstracted from these market sales of comparably improved structures. The results of this comparison are analyzed using statistical measures, including stratification by quality, and reviewing of estimated building costs plus land to sales prices. As a result of this analysis, a new regional multiplier or economic index factor and indications of neighborhood economic factors are developed for use in the district's cost process. This new economic index is estimated and used to adjust the district's cost schedule to be in compliance with local building costs as reflected by the local market.

### **Sales Information**

A sales file for the storage of "snapshot" sales data at the time of sale is maintained for real property. Residential vacant land sales, along with commercial improved and vacant land sales are maintained in a sales information system. Residential improved and vacant sales are collected from a variety of sources, including district questionnaires sent to buyers and sellers, field discovery, protest hearings, various sale vendors, builders, and realtors. A system of type, source, validity, and verification codes has been established to define salient facts related to a property's purchase or transfer and to help determine relevant market sale prices. The effect of time as an influence on price was considered by paired comparison and applied in the ratio study to the sales as indicated within each neighborhood area. Neighborhood sales reports are generated as an analysis tool for the appraiser in the development and estimation of market price ranges and property component value estimates. Abstraction and allocation of property components based on sales of similar property is an important analysis tool to interpret market sales under the cost and market approaches.

to value. These analysis tools help determine and estimate the effects of change, with regard to price, as indicated by sale prices for similar property within the current market.

Monthly time adjustments are estimated based on comparative analysis using paired comparison of sold property. Sales of the same property were considered and analyzed for any indication of price change attributed to a time change or influence. Property characteristics, financing, and conditions of sale were compared for each property sold in the pairing of property to isolate only the time factor as an influence on the price.

Multiple sales of the same property are considered and analyzed for any indication of price change attributed to a time change or influence. Property characteristics, financing, and conditions of sale may be compared for each property sold in the pairing of property to isolate only the time factor as an influence on price.

### **Statistical Analysis**

The residential valuation appraisers perform statistical analysis annually to evaluate whether estimated values are equitable and consistent with the market. Ratio studies are conducted on each of the residential valuation neighborhoods in the district to judge the two primary aspects of mass appraisal accuracy--level and uniformity of value. Appraisal statistics of central tendency generated from sales ratios are evaluated and analyzed for each neighborhood. The level of appraised values is determined by the weighted mean ratio for sales of individual properties within a neighborhood, and a comparison of neighborhood weighted means reflects the general level of appraised value between comparable neighborhoods.

The appraiser, through the sales ratio analysis process, reviews every neighborhood annually. The first phase involves neighborhood ratio studies that compare the recent sales prices of neighborhood properties to the appraised values of these sold properties. This set of ratio studies affords the appraiser an excellent means of judging the present level of appraised value and uniformity of the sales. The appraiser, based on the sales ratio statistics and designated parameters for valuation update, makes a preliminary decision as to whether the value level in a neighborhood needs to be updated or whether the level of market value in a neighborhood is at an acceptable level.

### **Market and Cost Reconciliation and Valuation**

Neighborhood analysis of market sales to achieve an acceptable sale ratio or level of appraisal is also the reconciliation of the market and cost approaches to valuation. Market factors are developed from appraisal statistics provided by market analyses and ratio studies and are used to ensure that estimated values are consistent with the market and to reconcile cost indicators. The district's primary approach to the valuation of residential properties uses a hybrid cost-sales comparison approach. This type of approach accounts for neighborhood market influences not particularly specified in a purely cost model.

The following equation denotes the hybrid model used:

$$MV = LV + (RCN - AD)$$

in accordance with the cost approach, the estimated market value (MV) of the property equals the land value (LV) plus the replacement cost new of property improvements (RCN) less accrued depreciation (AD). As the cost approach separately estimates both land and building contributory values and uses depreciated replacement costs, which reflect only the supply side of the market, it is expected that adjustments to the cost values may be needed to bring the level of appraisal to an acceptable standard as indicated by market sales. Thus, demand side economic factors and influences may be observed and considered. These market, or location adjustments, may be abstracted and applied uniformly within neighborhoods to account for locational variances between market areas or across a jurisdiction. Whereas, in accordance with the Market Approach, the estimated market value (MV) of the property equals the basic unit of property, by comparison, times the

market price range per unit for sales of comparable property. For residential property, the unit of comparison is typically the price per square foot of living area, or the price indicated for the improvement contribution. This analysis for the hybrid model is based on both the cost and market approaches as a correlation of indications of property valuation. A significant unknown for these two indications of value is determined to be the rate of change for the improvement contribution to total property value. The measure of change for this property component can best be reflected and based on the annualized accrued depreciation rate. This cost-related factor is most appropriately measured by sales of similar property. The market approach, when improvements are abstracted from the sale price, indicates the depreciated value of the improvement component, in effect, measuring changes in accrued depreciation, a cost factor. The level of improvement contribution to the property is measured by abstraction of comparable market sales, which is the property sale price less land value. The primary unknown for the cost approach is to accurately measure accrued depreciation affecting the amount of loss attributed to the improvements as age increases and condition changes. This evaluation of cost results in the depreciated value of the improvement component based on age and condition. The evaluation of this market and cost information is the basis of reconciliation and indication of property valuation under this hybrid model.

When the appraiser reviews a neighborhood, the appraiser reviews and evaluates a ratio study that compares recent sales prices of properties, appropriately adjusted for the effects of time, within a delineated neighborhood, with the value of the properties' based on the estimated depreciated replacement cost of improvements plus land value. The calculated ratio derived from the sum of the sold properties' estimated value divided by the sum of the time adjusted sales prices indicates the neighborhood level of appraisal based on sold properties. This ratio is compared to the acceptable appraisal ratio, 96% to 100%, to determine the level of appraisal for each neighborhood. If the level of appraisal for the neighborhood is outside the acceptable range of ratios, adjustments to the neighborhood are made.

If reappraisal of the neighborhood is indicated, the appraiser analyzes available market sales, appropriately adjusted for the apparent effects of time, by market abstraction of property components. This abstraction of property components allows the appraiser to focus on the rate of change for the improvement contribution to the property by providing a basis for calculating accrued depreciation attributed to the improvement component. This impact on value is usually the most significant factor affecting property value and the most important unknown to determine by market analysis. Abstraction of the improvement component from the adjusted sale price for a property indicates the effect of overall market suggested influences and factors on the price of improvements that were a part of this property, recently sold. Comparing this indicated price or value allocation for the improvement with the estimated replacement cost new of the improvement indicates any loss in value due to accrued forms of physical, functional, or economic obsolescence. This is a market driven measure of accrued depreciation and results in a true and relevant measure of improvement marketability, particularly when based on multiple sales that indicate the trending of this rate of change over certain classes of improvements within certain neighborhoods. Based on this market analysis, the appraiser estimates the annual rate of depreciation for given improvement descriptions considering age and observed condition. Once estimated, the appraiser recalculates the improvement value of all property within the sale sample to consider and review the effects on the neighborhood sale ratio. After an acceptable level of appraisal is achieved within the sale sample, the entire neighborhood of property is recalculated utilizing the indicated depreciation rates taken from market sales. This depreciation factor is the basis for trending all improvement values and when combined with any other site improvements and land value, brings the estimated property value through the cost approach closer to actual market prices as evidenced by recent sale prices available within a given neighborhood. Therefore, based on analysis of recent sales located within a given neighborhood, estimated property values will reflect the market influences and conditions only for the specified neighborhood, thus producing more representative and supportable values. The estimated property values calculated for each update neighborhood are based on market indicated factors applied uniformly to all properties within a neighborhood. Finally, with all the market-trend factors applied, a final ratio study is generated that compares recent sale prices with the proposed appraised values for these sold properties. From this set of ratio studies, the appraiser judges the appraisal level and uniformity in both update and non-

update neighborhoods and verifies appraised values against overall trends as exhibited by the local market, and finally, for the school district as a whole.

## Income Approach

The income approach to value is applied to those real properties which are typically viewed by market participants as “income producing”, and for which the income methodology is considered a leading value indicator. The basic formula for the income approach is Market Value= Net Operating Income Divided by Overall Cap Rate. This is also known as “Direct Capitalization”, which is a generally accepted appraisal technique used to convert one year’s stabilized income into an indication of market value. The income approach module provides the mechanism to capture and specify a property’s income characteristics using three levels or techniques known as “actual”, “default model” (market) and “pro forma”. These income calculations are laid out in three separate sections or tabs in the income module. The income formula is the same for each income approach technique, but the data used to calibrate or populate each technique may differ.

A thorough analysis of both actual income and default model income data is used to develop an indication of market value represented in the income pro forma calculation. The pro forma allows the appraiser to blend market rate comparable income data with actual income characteristics that are property specific.

The key model fields in the income approach formula include potential gross rent, physical vacancy, economic vacancy, secondary income, total operating expenses, net operating income and total tax rate, and capitalization rate.

The income approach formula is generally expressed the following way. A brief definition of each component of the formula is listed below.

	<u>Potential Gross Rent</u>
Minus	<u>Vacancy &amp; Collection Loss</u>
Equals	<u>Effective Gross Rent</u>
Plus,	<u>Secondary Income</u>
Equals	<u>Effective Gross Income</u>
Minus	<u>Operating Expenses</u>
Equals	<u>Net Operating Income</u>
Then	<b>Net Operating Income / Overall Cap Rate = Value</b>

Potential Gross Rent (PGR) - Total economic or market rent at 100% occupancy; Usually expressed as an annual amount on a per square foot or per unit basis.

Vacancy and Collection (V & C) - Loss in rental income because of physical vacancy, bad debt or economic rental concessions; often expressed as a percent of PGR; based on market cycles and trends.

Effective Gross Rent (EGR) - Rental Income after subtracting vacancy & rental loss from potential gross rent.

Secondary or Other Income - Income, other than rent, that is received from concessions; laundry rooms, parking, storage area rental, electronic communication roof space rental, and other sources related to ordinary operation of a property. (Secondary income can be expressed as a percentage of PGR or EGR or dollar amount per unit of measure.)

Effective Gross Income - Amount of actual income received from rent and secondary sources

Operating Expenses - Expenses necessary to maintain a cash flow from the real property (not from the business). Typical expenses include management, utilities, property insurance, property taxes, repairs and maintenance, etc. This dollar amount can also be expressed as a percentage or ratio that represents total expenses divided by effective gross income.

Net Operating Income (NOI) - Income remaining after subtracting operating expenses from Effective Gross Income. This amount is income before debt service, property depreciation, personal income taxes, amortization, or interest payments.

Overall Capitalization Rate (OAR) - Rate used to convert income into value. An overall rate represents the requirements of discount (return), recapture and effective tax rates for the whole property. This is expressed as cap rate plus tax rate. If the tax rate is "loaded" into the cap rate, then the amount of real estate taxes is removed as an expense item.

# SPECIAL APPRAISAL

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## RESIDENCE HOMESTEADS

Beginning in 1998, the State of Texas implemented a constitutional classification scheme concerning the appraisal of residential property that receives a residence homestead exemption. Under the law, beginning the second year a property receives a homestead exemption; increases in the assessed value of that property are "capped." The value for tax purposes (assessed value) of a qualified residence homestead will be the LESSER of:

- the market value; or
- the preceding year's appraised value;  
PLUS 10 percent for the preceding year;  
PLUS the value of any improvements added since the last re-appraisal.

Assessed values of capped properties must be recomputed annually. If a capped property sells, the cap automatically expires as of January 1st of the year following sale of the property and the property is appraised at its market value. A similar provision applies to new homes. While a developer owns them, unoccupied residences may be partially complete and appraised as part of an inventory. This valuation is estimated using the district's land value and the percentage of completion for the improvement contribution that usually is similar to the developer's construction costs as a basis of completion on the valuation date. However, in the year following changes in completion, occupancy, or sale, they are appraised at market value.

## Agricultural Appraisal

The Texas Constitution permits certain kinds of agricultural land to be appraised for tax purposes at a productivity value, rather than at market value. This special appraisal value is based solely on the land's capacity to produce agricultural products. Property qualifying for agricultural appraisal will have a substantial reduction in taxes, based on the difference in special agricultural appraisal and the market value of the property. Property taxes are deferred until a change of use of the property occurs or, in a much less frequently requested type of special agricultural appraisal, when the ownership changes. At the time of use or ownership change, taxes are recaptured for up to five previous years, based on the difference in what was paid based on agricultural appraisal, and what would have been paid based on the market value of the property. Procedures for implementing this appraisal are based on the guidelines published in the Manual for the Appraisal of Agricultural Land, printed February 2022. A copy may be obtained from the State Comptroller of Public Accounts.

### Application Process

The State Property Tax Code requires an application to be filed before land is considered for agricultural valuation. The deadline for filing a timely application is before May 1<sup>ST</sup>. Late agricultural valuation applications may be filed up to the time the appraisal roll is certified, however a penalty is imposed for late filing. After an application is filed, the property is inspected to determine its qualification.

Three criteria must be met when determining qualification.

- 1) Use- Land must currently be devoted principally to agricultural use.
- 2) Degree of Intensity- The agricultural use must be to the degree of intensity generally acceptable in the area.
- 3) History of Use- The land must have been devoted principally to agricultural use for five (5) of the preceding seven (7) years. Land located within an incorporated city or town must have been devoted principally to agricultural use continuously for the preceding five (5) years.

When the land's use qualifications have been reviewed, 1 of 3 actions will be taken.

- 1) Application is Denied– Property owner is notified by certified mail and given 30 days to appeal the decision to the Appraisal Review Board.
- 2) Application is Approved- Property owner is notified of the decision and the productivity land appraised value. Once approved, the property remains valued as a special agricultural use until a change of use occurs, or the ownership changes. If the property's use remains unchanged and only ownership has changed, the new owner is notified and is required to timely apply for special agricultural valuation.
- 3) Disapprove the Application and Request More Information- The application is disapproved, and the applicant is allowed thirty days to provide additional information, otherwise the application is denied. When requested information is provided, it is added to data already collected to arrive at a final decision.

The above process is also followed for Wildlife Management (WLM) with the exception that WLM requires prior use to be Ag, a WLM plan, WLM Annual Report, Inspection of property to verify WLM practices 1<sup>st</sup> year of plan and re-inspection in regular drive-out years.

## **INDIVIDUAL VALUE REVIEW PROCEDURES**

### **Field Review**

The appraiser identifies individual properties in critical need of field review through sales ratio analysis. Sold properties are field reviewed on a periodic basis to check for accuracy of data characteristics.

As the district's parcel count has increased through new home construction, and the homes constructed in the boom years of the late 70's and early 80's experience remodeling, the appraisers are required to perform the field activity associated with transitioning and high demand neighborhoods. Increased sales activity has also resulted in a more substantial field effort on the part of the appraisers to review and resolve sales outliers. Additionally, the appraiser frequently field reviews subjective data items such as quality of construction, condition, and physical, functional, and economic obsolescence, factors contributing significantly to the market value of the property. After preliminary estimates of value have been determined in targeted areas, the appraiser takes valuation documents to the field to evaluate the computer-assisted values against his own appraisal judgment. During this review, the appraiser is able to physically inspect both sold properties and unsold properties for comparability and consistency of values.

### **Office Review**

Once field review is completed, the appraiser conducts a routine valuation review of all properties as outlined in the discussion of ratio studies and market analysis. Valuation reports comparing previous values against proposed and final values are generated for all residential improved and vacant properties. The percentage of value differences are noted for each property within a delineated neighborhood allowing the appraiser to identify, research and resolve value anomalies (irregularities) before final appraised values are released. Previous values resulting from a hearing protest are individually reviewed to determine if the value remains appropriate for the current year.

## **PERFORMANCE TESTS**

### **Sales Ratio Studies**

The primary analytical tool used by the appraisers to measure and improve performance is the ratio study. The district ensures that the appraised values that it produces meet the standards of accuracy in several ways. Overall sales ratios are generated for each neighborhood to allow the appraiser to review general market trends within their area of responsibility and provide an indication of market appreciation over a specified period of time. The PC-based ratio studies are designed to emulate the findings of the state comptroller's annual property value study for category A property.

**Management Review Process**

Once the proposed value estimates are finalized, the appraiser reviews the sales ratios by neighborhood and presents pertinent valuation data, such as weighted sales ratio and pricing trends, to the Chief Appraiser for final review and approval. This review includes comparison of level of value between related neighborhoods within and across jurisdiction lines. The primary objective of this review is to ensure that the proposed values have met preset appraisal guidelines appropriate for the tax year in question.

Once the appraiser is satisfied with the level and uniformity of value for each neighborhood, the estimates of value go to noticing

# Commercial Property Valuation Process

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## INTRODUCTION

### Appraisal Responsibility

This mass appraisal assignment includes all the commercially described real property which falls within the responsibility of the commercial valuation appraisers of the Comanche Central Appraisal District and located within the boundaries of this taxing jurisdiction. Staff appraisers appraise the fee simple interest of properties according to statute and court decisions. However, the effect of easements, restrictions, encumbrances, leases, contracts, or special assessments are considered on an individual basis, as is the appraisal of any non-exempt taxable fractional interests in real property (i.e. certain multi-family housing projects). Fractional interests or partial holdings of real property are appraised in fee simple for the whole property and divided programmatically based on their prorated interests.

### Appraisal Resources

- **Personnel** - The improved real property appraisal responsibilities are categorized according to major property types of multi-family or apartment, office, retail, warehouse, and special use (i.e. hotels, hospitals and nursing homes).

*The following appraisers are responsible for estimating the market value of commercial property:*

**Jo Ann Hohertz, Chief Appraiser**

**Sandra Garcia, Deputy Appraiser & Personal Property Appraiser**

**Sandy Steward, Appraisal Director**

**Tawney Aldape, Appraiser**

**Tim Matthews, Appraiser**

**Richard Petree, Western Valuation, Consultant**

- **Data** - The data used by the commercial appraisers includes verified sales of vacant land and improved properties and the pertinent data obtained from each (sales price levels, capitalization rates, income multipliers, equity dividend rates, marketing period, etc.). Other data used by the appraisers includes actual income and expense data (typically obtained through the hearings process), actual contract rental data, leasing information (commissions, tenant finish, length of terms, etc.), and actual construction cost data. In addition to the actual data obtained from specific properties, market data publications are also reviewed to provide additional support for market trends.

## PRELIMINARY ANALYSIS

### Market Study

Market studies are utilized to test new or existing procedures or valuation modifications in a limited sample of properties located in the district and are also considered and become the basis of updating whenever substantial changes in valuation are made. These studies target certain types of improved property to evaluate current market prices for sales of commercial and industrial real property. These comparable sale studies and ratio studies reveal whether the valuation system is producing accurate and reliable value estimates or whether procedural and economic modifications are required. The appraiser implements this methodology when developing cost approach, market approach, and income approach models.

Comanche CAD administration and personnel interact with other assessment officials through professional trade organizations including the International Association of Assessing Officers, Texas Association of Appraisal Districts, and the Texas Association of Assessing Officers. District staff strives to maintain appraisal skills and professionalism by continuing education in the form of courses that are offered by several professional associations such as International Association of Assessing Officers (IAAO), Texas Association of Assessing Officers (TAAO), Texas Association of Appraisal Districts (TAAD) and Texas Department of Licensing and Regulation of Tax Professionals courses.

## **VALUATION APPROACH**

### **Land Value**

Commercial land is analyzed annually to compare appraised values with recent sales of land in the market area. If appraised values differ from sales prices being paid, adjustments are made to all land in that region. Generally, commercial property is appraised on a price per front foot basis. Factors are placed on individual properties based on depth of site, shape of site, easements across site, land-locked sites and other factors that may influence value. The land is valued as though vacant at the highest and best use.

### **Area Analysis**

Area data on regional economic forces such as demographic patterns, regional locational factors, employment and income patterns, general trends in real property prices and rents, interest rate trends, availability of vacant land, and construction trends and costs are collected from private vendors and public sources.

### **Neighborhood Analysis**

The neighborhood and market areas are comprised of the land area and commercially classed properties located within the boundaries of this appraisal jurisdiction. These areas consist of a wide variety of property types including multiple-family residential, commercial, and industrial. Neighborhood and area analysis involves the examination of how physical, economic, governmental, and social forces and other influences may affect property values within subgroups of property locations. The effects of these forces are also used to identify, classify, and organize comparable properties into smaller, manageable subsets of the universe of properties known as neighborhoods. In the mass appraisal of commercial and industrial properties these subsets of a universe of properties are generally referred to as market areas, neighborhoods, or economic areas.

Economic areas are defined by each of the improved property use types (apartment, office, retail, warehouse, and special use) based upon an analysis of similar economic or market forces. These include but are not limited to classification of projects (known as building class by area commercial market experts), date of construction, overall market activity or other pertinent influences. Economic area identification and delineation by each major property use type is the benchmark of the commercial valuation system. All income model valuation (income approach to value estimates) is economic area specific. The geographic boundaries as well as income, occupancy and expense levels and capitalization rates by age within each economic area for all commercial use types and its corresponding income model have been estimated for these properties.

### **Highest and Best Use Analysis**

The highest and best use is the most reasonable and probable use that generates the highest net to land and present value of the real estate as of the date of valuation. The highest and best use of any given property must be physically possible, legally permissible, financially feasible, and maximally productive. For improved properties, highest and best use is evaluated as improved and as if the site were still vacant. This perspective assists in determining if the existing improvements have a transitional use, interim use, nonconforming use, multiple uses, speculative use, is excess land, or a different optimum use if the site were vacant. For vacant tracts of land within this jurisdiction, the highest and best use is considered speculative based on the surrounding land uses. Improved properties reflect a wide variety of highest and best uses which include, but

are not limited to office, retail, apartment, warehouse, light industrial, special purpose, or interim uses. In many instances, the property's current use is the same as its highest and best use. This analysis ensures that an accurate estimate of market value (sometimes referred to as value in exchange) is derived.

On the other hand, value in use represents the value of a property to a specific user for a specific purpose. This perspective for value may be significantly different than market value, which approximates market price under the following assumptions: (i) no coercion of undue influence over the buyer or seller in an attempt to force the purchase or sale, (ii) well-informed buyers and sellers acting in their own best interests, (iii) a reasonable time for the transaction to take place, and (iv) payment in cash or its equivalent.

## **Market Analysis**

A market analysis relates directly to examining market forces affecting supply and demand. This study involves the relationships between social, economic, environmental, governmental, and site conditions. Current market activity including sales of commercial properties, new construction, new leases, lease rates, absorption rates, vacancies, allowable expenses (inclusive of replacement reserves), expense ratio trends, capitalization rate studies are analyzed to determine market ranges in price, operating costs, and investment return expectations.

## **DATA COLLECTION / VALIDATION**

### **Data Collection Manuals**

Data collection and documentation for Commercial/Industrial property is continually updated, providing a uniform system of itemizing the multitude of components comprising improved properties. All properties located in Comanche CAD's inventory are coded according to a specific classification system and the approaches to value are structured and calibrated based on this coding system.

Annually, after the sales of property have been researched, verified, keyed into the database, and quality control has been completed, the sales data is summarized and produced into list form. The confirmed sales reports, known as the Commercial Improved and Vacant Land sales listings categorize the sales by property and use type, and sort the data by location and chronological order. Many of these sales are available to the public for use during protest hearings and are also used by the Comanche CAD appraisers during the hearings process.

### **Sources of Data**

In terms of commercial sales data, Comanche CAD receives a copy of the deeds recorded in Comanche County that convey commercially classed properties. These deeds involving a change in commercial ownership are entered into the sales information system and researched in an attempt to obtain the pertinent sale information. Other sources of sale data include the protest hearings process and local, regional, and national real estate and financial publications.

For those properties involved in a transfer of commercial ownership, a sale file is produced which begins the research and verification process. The initial step in sales verification involves a computer-generated questionnaire, which is mailed to both parties in the transaction (Grantor and Grantee). If a questionnaire is answered and returned, the documented responses are recorded into the computerized sales database system. If no information is provided, verification of many transactions is then attempted via phone calls to parties thought to be knowledgeable of the specifics of the sale. Other sources contacted are the brokers involved in the sale, property managers or commercial vendors. In other instances, sales verification is obtained from local appraisers or others that may have the desired information. Finally, closing statements are often provided during the hearings process. The actual closing statement is the most reliable and preferred method of sales verification.

## **VALUATION ANALYSIS**

Model calibration involves the process of periodically adjusting the mass appraisal formulae, tables, and schedules to reflect current local market conditions. Once the models have undergone the specification process, adjustments can be made to reflect new construction procedures, materials, and/or costs, which can vary from year to year. The basic structure of a mass appraisal model can be valid over an extended period of time, with trending factors utilized for updating the data to the current market conditions. However, at some point, if the adjustment process becomes too involved, the model calibration technique can mandate new model specifications or a revised model structure.

### **Cost Schedules**

The cost approach to value is applied to improved real property utilizing the comparative unit method. This methodology involves the utilization of national cost data reporting services as well as actual cost information on local comparable properties whenever possible. Cost models are typically developed based on the Marshall Valuation Service which indicates estimated hard or direct costs of various improvement types. Cost models include the derivation of replacement cost new (RCN) of all improvements represented within the district. These include comparative base rates, per unit adjustments and lump sum adjustments for variations in property description, design, and types of improvement construction. This approach and analysis also employs the sales comparison approach in the evaluation of soft or indirect costs of construction. Evaluating market sales of newly developed improved property is an important part of understanding total replacement cost of improvements. What total costs may be involved in the development of the property, as well as any portion of cost attributed to entrepreneurial profit can only be revealed by market analysis of pricing acceptance levels. In addition, market related land valuation for the underlying land value is important in understanding and analyzing improved sales for all development costs and for the abstraction of improvement costs for construction and development. Time and location modifiers are necessary to adjust cost data to reflect conditions in a specific market and changes in costs over a period of time. Because a national cost service is used as a basis for the cost models, locational modifiers and estimates of soft cost factors are necessary to adjust these base costs specifically for various types of improvements located in Comanche County. Thus, local modifiers and additional cost factors are applied to replacement costs estimated by the national cost service. Estimated replacement cost new will reflect all costs of construction and development for various improvements located in Comanche CAD as of the date of appraisal.

Accrued depreciation is the sum of all forms of loss affecting the contributory value of the improvements. It is the measured loss against replacement cost new taken from all forms of physical deterioration, functional and economic obsolescence. Accrued depreciation is estimated and developed based on losses typical for each property type at that specific age. Depreciation estimates have been implemented for what is typical of each major class of commercial property by economic life categories. Estimates of accrued depreciation have been calculated for improvements with a range of variable years expected life based on observed condition considering actual age. These estimates are continually tested to ensure they are reflective of current market conditions. The actual and effective ages of improvements are noted in CAMA. Effective age estimates are based on the utility of the improvements relative to where the improvement lies on the scale of its total economic life and its competitive position in the marketplace. Effective age estimates are considered and reflected based on five levels or rankings of observed condition, given actual age.

Additional forms of depreciation such as external and/or functional obsolescence can be applied if observed. A depreciation calculation override can be used if the condition or effective age of a property varies from the norm by appropriately noting the physical condition and functional utility ratings on the property data characteristics. These adjustments are typically applied to a specific condition adequacy or deficiency, property type or location and can be developed via ratio studies or other market analyses.

The result of estimating accrued depreciation and deducting that from the estimated replacement cost new of improvements indicates the estimated contributory value of the improvements. The total property value is

then computed by adding the depreciated value of the improvements to the value of the land. Given relevant cost estimates and market related measures of accrued depreciation, the indicated value of the property by the cost approach becomes a very reliable valuation technique.

### **Income Models**

The income approach to value is applied to those real properties which are typically viewed by market participants as “income producing,” and for which the income methodology is considered a leading value indicator. The first step in the income approach pertains to the estimation of market rent on a per unit basis. This is derived primarily from actual rent data furnished by property owners. This per unit rental rate multiplied by the number of units results in the estimate of potential gross rent.

A vacancy and collection loss allowance is the next item to consider in the income approach. The projected vacancy and collection loss allowance is established from actual data furnished by property owners. This allowance accounts for periodic fluctuations in occupancy, both above and below an estimated stabilized level. This feature may also provide for a reasonable lease-up period for multi-tenant properties, where applicable. The vacancy and collection loss allowance is subtracted from the potential gross rent estimate, and any secondary income added, to yield an indication of estimated annual effective gross rent to the property.

Secondary income represents laundry income, reimbursements, and other miscellaneous income generated by the operations of real property. The secondary income estimate is derived from actual data collected. Allowable expenses and expense ratio estimates are based on a study of the local market, with the assumption of prudent management. An allowance for non-recoverable expenses such as leasing costs and tenant improvements may be included in the expenses. A non-recoverable expense represents costs that the owner pays to lease rental space.

Another form of allowable expense is the replacement of short-lived items (such as roof or floor coverings, air conditioning or major mechanical equipment or appliances) requiring expenditures of lump sum costs. When these capital expenditures are analyzed for consistency and adjusted, they may be applied on an annualized basis as stabilized expenses. When performed according to local market practices by commercial property type, these expenses when annualized are known as replacement reserves. For some types of property, typical management does not reflect expensing reserves and is dependent on local and industry practices.

Subtracting the allowable expenses (inclusive of non-recoverable expenses and replacement reserves when applicable) from the annual effective gross income yields an estimate of annual net operating income to the property.

Capitalization rates are used to convert operating income expectations into an estimate of market value for the property under the income approach. Capitalization analysis is used in the income approach models to form an indication of value. This methodology involves the direct capitalization of net operating income as an indication of market value for a specific property. Capitalization rates applicable for direct capitalization method and yield rates for estimating terminal cap rates for discounted cash flow analysis are derived from the market. Sales of improved properties from which actual income and expense data are obtained provide a very good indication of property return expectations a specific market participant is requiring from an investment at a specific point in time. In addition, overall capitalization rates can be derived and estimated from the built-up method (band-of-investment). This method relates to satisfying estimated market return requirements of both the debt and equity positions in a real estate investment. This information is obtained from available sales of property, local lending sources, and from real estate and financial publications.

### **Sales Comparison (Market) Approach**

Although all three of the approaches to value are based on market data, the Sales Comparison Approach is most frequently referred to as the Market Approach. This approach is utilized not only for estimating land value but also in comparing sales of similarly improved properties to parcels on the appraisal roll. As

previously discussed in the Data Collection / Validation section of this report, pertinent data from actual sales of properties, both vacant and improved, is pursued throughout the year in order to obtain relevant information which can be used in all aspects of valuation. Sales of similarly improved properties can provide a basis for the depreciation schedules in the Cost Approach, rates and multipliers used in the Income Approach, and as a direct comparison in the Sales Comparison Approach. Improved sales are also used in ratio studies, which afford the appraiser an excellent means of judging the present level and uniformity of the appraised values.

### **Final Valuation Schedules**

Based on the market data analysis and review discussed previously in the cost, income and sales approaches, the cost and income models are calibrated and finalized. The calibration results are keyed to the schedules and models in the CAMA system for utilization on all commercial properties in the district. Market factors reflected within the cost approach are evaluated and confirmed based on market sales of commercial properties. The appraisers review the cost, income, and sales comparison approaches to value for each of the types of properties with available sales information. The final valuation of a property is estimated based on reconciling these indications of value considering the weight of the market information available for evaluation and analysis in these approaches to value.

### **Statistical and Capitalization Analysis**

Statistical analysis of final values is an essential component of quality control. This methodology represents a comparison of the final value against the standard and provides a concise measurement of the appraisal performance. Statistical comparisons of many different standards are used including sales of comparable properties, the previous year's appraised value, value change analysis and sales ratio analysis.

Appraisal statistics of central tendency and dispersion generated from sales ratios are calculated for each property type with available sales data. These summary statistics including, but not limited to, the weighted mean, provide the appraisers with an analytical tool by which to determine both the level and uniformity of appraised value of a particular property type. The level of appraised values can be determined by the weighted mean for individual properties within a specific type, and a comparison of weighted means can reflect the general level of appraised value.

The appraisers review every commercial property type annually through the sales ratio analysis process. The first phase involves ratio studies that compare the recent sales prices of properties to the appraised values of the sold properties. This set of ratio studies affords the appraiser an excellent means of judging the present level of appraised value and uniformity of the appraised values. The appraiser, based on the sales ratio statistics and designated parameters for valuation update, makes a preliminary decision as to whether the value level of a particular property type needs to be updated in an upcoming reappraisal, or whether the level of market value is at an acceptable level.

## **INDIVIDUAL VALUE REVIEW PROCEDURES**

### **Field Review**

The date of the last inspection, extent of that inspection, and the Comanche CAD appraiser responsible are listed in the CAMA system. If a property owner disputes the District's records concerning this data in a protest hearing, CAMA may be altered based on the credibility of the evidence provided. Normally, a new field check is then requested to verify this information for the current year's valuation or for next year's valuation. In addition, if a building permit is filed for a particular property indicating a change in characteristics, that property is added to a work file for review.

Commercial appraisers are somewhat limited in the time available to field review all commercial properties of a specific use type. However, a major effort is made by appraisers to field review as many properties as possible or economic areas experiencing large numbers of remodels, renovations, or retrofits, changes in occupancy levels, new leasing activity, new construction, or wide variations in sale prices. Field review of real property accounts is accomplished while business personal property is reviewed and inspected in the field. Additionally, the appraisers frequently field review subjective data items such as building class, quality of construction (known as cost modifiers), condition, and physical, functional, and economic obsolescence factors contributing significantly to the market value of the property. While in the field, the appraisers physically inspect sold and unsold properties for comparability and consistency of values.

### **Office Review**

Office reviews are completed on properties subject to field inspections and are performed in compliance with the guidelines required by the existing classification system. Office reviews are typically limited by the available market data presented for final value analysis. These reviews summarize the pertinent data of each property as well as comparing the previous value to the proposed value conclusions of the various approaches to value. These evaluations and reviews show proposed value changes, economic factor (cost overrides) and special factors affecting the property valuation such as new construction status, and a three-year sales history (USPAP property history requirement for non-residential property). The appraiser may review methodology for appropriateness to ascertain that it was completed in accordance with USPAP or more stringent statutory and district policies. This review is performed after preliminary ratio statistics have been applied. If the ratio statistics are generally acceptable overall the review process is focused primarily on locating skewed results on an individual basis. Previous values resulting from protest hearings are individually reviewed to determine if the value remains appropriate for the current year based on market conditions.

### **PERFORMANCE TESTS**

The primary tool used to measure mass appraisal performance is the ratio study. A ratio study compares appraised values to market prices. In a ratio study, market values (value in exchange) are typically represented with the range of sale prices, i.e., a sales ratio study. In addition, appraisal ratio studies can be used for properties statutorily not appraised at market value but reflect the use-value requirement. An example of this are multi-family housing projects subject to subsidized rent provisions or other governmental guarantees as provided by legislative statutes (affordable housing) or agricultural lands to be appraised on the basis of productivity or use value.

Comanche CAD has adopted the policies of the IAAO STANDARD ON RATIO STUDIES, circa July 1999 regarding its ratio study standards and practices. Ratio studies generally have six basic steps: (1) determination of the purpose and objectives, (2) data collection and preparation, (3) comparing appraisal and market data, (4) stratification, (5) statistical analysis, and (6) evaluation and application of the results.

### **Sales Ratio Studies**

Sales ratio studies are an integral part of estimating equitable and accurate market values, and ultimately property assessments for these taxing jurisdictions. The primary uses of sale ratio studies include the determination of a need for general reappraisal; prioritizing selected groups of property types for reappraisal; identification of potential problems with appraisal procedures; assist in market analyses; and, to calibrate models used to estimate appraised values during valuation or reappraisal cycles.

### **Comparative Appraisal Analysis**

The staff appraisers perform an average unit value comparison in addition to a traditional ratio study. These studies are performed on commercially classed properties by property use type (such as apartment, office, retail and warehouse usage or special use). The objective of this evaluation is to determine appraisal

performance of sold and unsold properties. Appraiser's average unit prices of sales and average unit appraised values of the same parcels and the comparison of average value changes of sold and unsold properties. These studies are conducted on substrata such as building class and on properties located within a school district. In this way, overall appraisal performance is evaluated geographically, by specific property type to discern whether sold parcels have been selectively appraised. When sold parcels and unsold parcels are appraised equally, the average unit values are similar. These sales and equity studies are performed prior to final appraisal.

Once the appraiser is satisfied with the level and uniformity of value for each commercial property, the estimates of value go to noticing. Each parcel is subjected to the value parameters appropriate for its use type.

# Business Personal Property Valuation Process

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## INTRODUCTION

### Appraisal Responsibility

This mass appraisal assignment includes all the Business Personal Property which falls within the responsibility of the BPP appraiser of the Comanche Central Appraisal District and located within the boundaries of this taxing jurisdiction.

4 different personal property types are appraised by the district's personal property section:

1. business personal property accounts;
2. leased assets;
3. vehicles and aircraft;
4. and multi-location assets.

- **Personnel** - The personal property staff consists of 1 appraiser and 3 support staff.

**Sandra Garcia, Staff Appraiser, Deputy Chief & Personal Property Appraiser**

**Sandy Steward, Appraisal Director**

**Tim Matthews, Appraiser**

**Tawney Aldape, Appraiser**

- **Data** - A common set of data characteristics for each personal property account in Comanche CAD is collected in the field and data entered using a field card. The property characteristic data drives the computer-assisted personal property appraisal (CAPPA) system. The personal property appraisers collect the field data and maintain electronic property files making updates and changes gathered from field inspections, newspapers, property renditions, sales tax permit listing and interviews with property owners.

## VALUATION APPROACH

### SIC Code Analysis

Business personal property is classified and utilizes a four-digit numeric code, called Standard Industrial Classification (SIC) codes that were developed by the federal government to describe property. Comanche CAD uses these classifications to classify personal property by business type.

SIC code identification and delineation is the cornerstone of the personal property valuation system at the district. All the personal property analysis work done in association with the personal property valuation process is SIC code specific. SIC codes are delineated based on observable aspects of

### Highest and Best Use Analysis

The highest and best use of property is the reasonable and probable use that supports the greatest income and the highest present value as of the date of the appraisal. The highest and best use must be physically possible, legal, financially feasible, and productive to its maximum. The highest and best use of personal property is normally its current use.

## **DATA COLLECTION/VALIDATION**

### **Data Collection Procedures**

Personal property data collection procedures are published and distributed to all appraisers involved in the appraisal and valuation of personal property. The appraisal procedures are reviewed and revised to meet the changing requirements of field data collection.

### **Sources of Data**

#### **Business Personal Property**

The district's property characteristic data was collected through a massive field data collection effort coordinated by the district over the recent past and from property owner renditions. From year to year, reevaluation activities permit district appraisers to collect new data via field inspection. This project results in the discovery of new businesses, changes in ownership, relocation of businesses, and closures of businesses not revealed through other sources. Tax assessors, city and local newspapers, and the public often provide the district information regarding new personal property and other useful facts related to property valuation.

#### **Personal Property Renditions**

Rendition laws provide additional information on which to base the values of all Business Personal Property accounts. The CAD mails renditions to all current and new businesses before January 31st every year. Renditions must be filed with the CAD before April 15<sup>th</sup> each year, or the owner must submit a written request for an extension by May 15<sup>th</sup>. All renditions are reviewed for the necessary information, such as account number, school district property is located, property use code, and value. The rendered value, if any, is reviewed for data entry by the appraiser. Other sources of data include field inspections.

#### **Vehicles**

An outside vendor provides Comanche CAD with a listing of vehicles within the district. The vendor develops this listing from the Texas Department of Transportation (TxDOT) Title and Registration Division records. Other sources of data include property owner renditions and field inspections. Other sources of data include field inspections.

#### **Leased and Multi-Location Assets**

The primary source of leased and multi-location assets is property owner renditions of property. Other sources of data include field inspections.

#### **Commercial and Business Aircraft**

Valuation is accomplished by referencing the Aircraft list provided to CAD. The Texas Property Tax Code has a specific methodology for the valuation and or allocation of all aircraft. Other sources of data include field inspections.

#### **Special Inventory**

Monthly and annual declaration forms for heavy equipment, manufactured homes, and motor vehicle dealers (as defined by section 23 of the Texas Property Tax Code) are used for discovery and valuation of special inventory accounts. Alternate discovery methods may sometimes be used as described in the Business Personal Property section.

## **VALUATION AND STATISTICAL ANALYSIS (model calibration)**

## **Cost Schedules**

Cost schedules are developed based on the SIC code by the Property Tax Division of the Comptroller's Office and by district personal property valuation appraisers. The cost schedules are developed by analyzing cost data from property owner renditions, hearings, state schedules, and published cost guides. The cost schedules are reviewed as necessary to conform to changing market conditions. The schedules are typically in a price per square foot format, but some exception SIC's are in an alternate price per unit format, such as per room for hotels.

## **Statistical Analysis**

Summary statistics including, but not limited to, the median, weighted mean, and standard deviation provide the appraisers with an analytical tool by which to determine both the level and uniformity of appraised value by SIC code. Review of the standard deviation can discern appraisal uniformity within SIC codes.

## **Depreciation Schedule and Trending Factors:**

### **Business Personal Property**

Comanche CAD's primary approach to the valuation of business personal property is the cost approach. The replacement cost new (RCN) is either developed from property owner reported historical cost or from CAD developed valuation models. The trending factors used by the CAD to develop RCN are based on published valuation guides. The percent good depreciation factors used by Comanche CAD are also based on published valuation guides. The index factors and percent good depreciation factors are used to develop present value factors (PVF), by year of acquisition, as follows:

$$PVF = INDEX FACTOR \times PERCENT GOOD FACTOR$$

The PVF is used as an "express" calculation in the cost approach. The PVF is applied to reported historical cost as follows:

$$MARKET VALUE ESTIMATE = PVF \times HISTORICAL COST$$

This mass appraisal PVF schedule is used to ensure that estimated values are uniform and consistent within the market and reflect current economic pressures of supply and demand.

### **Computer Assisted Personal Property Appraisal (CAPPA)**

The CAPPA valuation process has two main objectives: 1) Analyze and adjust estimated asset cost with existing SIC models. 2) Develop new models for business classifications not previously integrated into CAPPA. The delineated sample is reviewed for accuracy of SIC code, square footage, field data, and original cost information. Models are created and refined using actual original cost data to derive a typical replacement cost new (RCN) per square foot for a specific category of assets. The RCN per square foot is depreciated by the estimated age using the depreciation table adopted for the tax year.

The data sampling process is conducted in the following order: 1) Prioritizing Standard Industrial Classification (SIC) codes for model analysis. 2) Compiling the data and developing the reports. 3) Field checking the selected samples. The models are built and adjusted using internally developed software. The models are then tested against the previous year's data. The typical RCN per square foot (or applicable unit) is determined by a statistical analysis of the available data.

CAPPA model values are used in the general business personal property valuation program to estimate the value of new accounts for which no property owner's rendition is filed. Model values are also used to establish

tolerance parameters for testing the valuation of property for which prior data years' data exist or for which current year rendered information is available. The calculated current year value or the prior year's value is compared to the indicated model value by the valuation program. If the value being tested is within an established acceptable percentage tolerance range of the model value, the account passes that range check and moves to the next valuation step. If the account fails the tolerance range check, it is flagged for individual review. Allowable tolerance ranges may be adjusted from year to year depending on the analysis of the results of the prior year.

### **Vehicles**

Value estimates for vehicles are provided by an outside vendor and are based on Red Book published book values, and there are also considerations available for high mileage. Vehicles that are not valued by the vendor are valued by an appraiser using PVF schedules or published guides.

### **Leased and Multi-Location Assets**

Leased and multi-location assets are valued using the PVF schedules mentioned above. If the asset to be valued in this category is a vehicle, then Red Book published book values are used. Assets that are not valued by the vendor are valued by an appraiser using PVF schedules or published guides.

### **Commercial and Business Aircraft**

The commercial and business aircraft accounts are simultaneously valued/reviewed with rendered data and third-party value data.

### **Special Inventory**

The Texas Property Tax Code provides a specific methodology for valuing this category of property. Valuation is based upon the annual declaration filed by the property owner indicating the previous year's Texas sales (used as the numerator) and divided by a factor of 12 (the denominator). This establishes a monthly basis consistent with the owner's tax payment requirements. In the absence of an annual declaration, similar businesses that have filed declarations are identified and compared, with appropriate adjustments, to the subject property to establish an estimated market value.

## **INDIVIDUAL VALUE REVIEW PROCEDURES**

### **Office Review**

#### **Business Personal Property and Leased Asset/Special Property at Multiple Locations Account**

The BPP appraiser and staff verify information on renditions and accounts with field or other data changes. Once proofed and necessary corrections are made the account is sent an Appraisal Notice.

### **Special Inventory**

CAD's CAPPA system ensures dealers without a current declaration on file are contacted to advise them of their legal filing requirements and to provide the CAD with the most current valuation/review data available.

## **PERFORMANCE TESTS**

### **Ratio Studies**

Biannually the Property Tax Division of the state comptroller's office conducts a property value study (PVS). The PVS is a ratio study used to gauge appraisal district performance. Results from the PVS play a part in school funding. Rather than a sales ratio study, the personal property PVS is a ratio study using state cost and depreciation schedules to develop comparative personal property values. These values are then compared to Comanche CAD's personal property values and ratios are indicated.



In accordance with Section 25.18 of the Tax Code:

- (a) CAD shall implement the plan for periodic reappraisal of property as approved by the board of directors under Section 6.05 (i).

The plan provides for annual reappraisal of all oil, gas, and mineral properties, industrial property, utilities, railroads, and pipelines in the CAD. **The CAD has a professional services contract with Thomas Y Pickett, & Company, Inc. to appraise these properties for the CAD.**

**Comanche County Appraisal District**  
**Oil and Gas Reserves**  
**2025-26 Appraisal Procedures and Reappraisal Plan**

**August 13, 2024**

by

Thomas Y. Pickett & Company, Inc.

# APPRAISAL PROCEDURES & REAPPRAISAL PLAN

## OIL AND GAS RESERVES

### Executive Summary

- Thomas Y. Pickett & Co., Inc. (“Thomas Y. Pickett” or “Pickett”) annually reappraises all producing mineral leases within the CAD’s boundaries using a Discounted Cash Flow (“DCF”) methodology.
- Thomas Y. Pickett uses the Comptroller’s Manual for Discounting Oil and Gas Income pursuant to Tax Code Section 23.175.
- Thomas Y. Pickett determines oil and gas prices in accordance with Tax Code Section 23.175.
- Thomas Y. Pickett’s written procedures for identifying new properties are included herein.

### Overview

Oil and gas reserves consist of interests in subsurface mineral rights. Thomas Y. Pickett & Co. is contracted to reappraise this type of property annually for the appraisal district. The completed appraisals are all retrospective in nature. The purpose of the appraisals is to estimate market value as of January 1 in accordance with the definition of market value established in the Texas Property Tax Code (Sec. 1.04). “Market value” means the price at which a property would transfer for cash or its equivalent under prevailing market conditions if:

- A. exposed for sale in the open market with a reasonable time for the seller to find a purchaser.
- B. both the seller and the purchaser know of all the uses and purposes to which the property is adapted and for which it is capable of being used and of the enforceable restrictions on its use; and
- C. Both the seller and purchaser seek to maximize their gains, and neither is in a position to take advantage of the exigencies of the other.

The appraisal results will be used as the tax base upon which a property tax will be levied. Each mineral interest is listed on the appraisal roll separately from other interests in the mineral in place in conformance with the Texas Property tax Code Sec. 25.12. A listing of the oil and gas properties appraised by Pickett for the appraisal district shall be made available at the appraisal district office. Subsurface mineral rights are not susceptible to physical inspection. This condition creates the need to invoke the Departure Provision as required by the Standards Rule

6-7 (f) comment on the Uniform Standards of Professional Practice. However, the inability to physically examine the property does not affect the appraisal process or the quality of the results. The appraisal district is aware of this limiting condition and agrees that it is appropriate.

Documents relevant to an understanding of these appraisals include the confidential rendition, if any, filed with the appraisal district by the owner or agent of the property; the Texas Comptroller's Manual for Discounting Oil and Gas Income; other reports described in the Texas Property Tax Code; and other confidential data supplied by the owner or agent; the General Appraisal Manual adopted by the Texas Comptroller of Public Accounts; Property Assessment Valuation published by the International Association of Assessing Officers and adopted by the Texas Comptroller of Public Accounts and the Texas Property Tax Code.

Pickett's oil and gas appraisal staff includes licensed engineers as well as experienced appraisers who are knowledgeable in all three approaches to value. Oil and gas appraisal staff stays abreast of current trends affecting oil and gas properties through review of published materials, attendance at conferences, course work and continuing education. All oil and gas appraisers are registered with the Texas Department of Licensing and Regulation, (formerly, the Texas Board of Tax Professional Examiners).

#### Assumptions and Limiting Conditions

All appraisals are subject to the following assumptions and limiting conditions:

1. Title to the property is assumed to be good and marketable and the legal description correct.
2. No responsibility for legal matters is assumed. All existing liens, mortgages or other encumbrances have been disregarded and the property is appraised as free and clear, under responsible ownership and competent management.
3. The appraisers developing these appraisals are not required to give testimony or attendance in court by reason of the appraisals, unless directed by, employed by, and provided legal counsel by the Appraisal District.
4. The appraisers do not inspect every property every year.
5. All sketches on the appraisal documents are intended to be visual aids and should not be construed as surveys or engineering reports unless otherwise specified.
6. All information in the appraisal documents have been obtained by members of Thomas Y. Pickett's staff or by other reliable sources.
7. The appraisals were prepared exclusively for ad valorem tax purposes.

## Property Discover and Data Collection Process

Mineral properties are identified and appraised based on their Railroad Commission Identification Number (RRCID). Upon completion of a new well, a Completion Report must be submitted to the Railroad Commission (RRC). The RRC then issues a RRCID. Production from that property is reported by RRCID. Periodically, wells are completed and start producing prior to being issued a RRCID. The production from these wells still must be reported to the RRC and are usually reported by Drilling Permit Number (DP). Since mineral properties are appraised using a Discounted Cash Flow analysis, production data is required to do the analysis. The RRC is the primary source of that data.

### Procedure:

1. At the beginning of the year, the RRC database is searched for new wells that started producing prior to January 1 of the appraisal year. These wells are identified by RRCID or Drilling Permit (DP) number and added to the mineral appraisal database for the county. A well is considered to have value as of January 1 if it has reported production prior to that date, has filed a completion report showing completion prior to that date, or was perforated into a producing formation which showed the presence of oil or gas prior to January 1.
2. Completion reports and plates are retrieved from the RRC to identify the location of the producing wells. These locations are cross-referenced with jurisdictional maps to establish situs.
3. Division of Interest (DOI) statements are requested from the operator of the well to establish working and royalty interests.
4. Additional reviews of the RRC database are done periodically during the year to identify any wells that may have been added to the RRC database after the first of the year but were completed prior to January 1 of the appraisal year. New producing wells identified after the appraisal period are supplemented, going back up to five years.

Other appraisal data on the subject properties are collected from required regulatory reports from the Texas Railroad Commission and the Texas Comptroller of Public Accounts and by the property owner. Submitted data may be on a rendition form or in other modes that require confidentiality. Subject property data are verified through previously existing records and through published reports. Additional data are obtained and verified through published sources, regulatory reports and through analysis of comparable properties, if any. Due to the unique nature of many oil and gas properties there is no standard data collection form or manual.

## Valuation Approach and Analysis

The three generally accepted approaches used in determining the Market Value of assets are the cost, income, and market approaches. The following is a brief description of the three general approaches to value.

### Cost Approach

The cost approach considers the replacement cost of an asset as an indicator of value. The cost approach is based on the assumption that a prudent investor would pay no more for an asset than the amount for which he could replace or recreate the asset. The cost approach is sometimes performed by estimating the replacement cost of an asset functionally similar to the subject. Often, historical cost data can be used to indicate the current cost of reproduction or replacement. Adjustments are made for physical deterioration and the functional and economic obsolescence of the appraised asset.

### Income Approach

The income approach measures the present worth of anticipated future net cash flows generated by the subject assets. The net cash flows are forecast for an appropriate period or capitalized in the case of a single period model, and then discounted to present value using an appropriate discount rate.

### Market Approach

The market approach is performed by observing the price at assets comparable to the subject asset are bought and sold. Adjustments are made to the data to account for capacity differences and other relevant differences between the subject asset and the comparable assets.

Depending on the facts and circumstances of a particular appraisal, applying the three approaches independently of one another can yield conclusions that are substantially different. As the appraisal is performed, the strengths of the individual approaches are considered and the influence of each approach in the appraisal process is weighed according to its likely accuracy.

All oil and gas interest values are arrived at through an appraisal of the whole property. Each fractional interest is then assigned a value on the basis of its relative share of expenses, income, and the value of the operating equipment. Multiple producing zones in the same well may be treated as separate properties.

Oil and gas properties are principally appraised through the income approach to value. Specifically, the discounted cash flow (DCF) technique is used almost exclusively. The almost exclusive reliance on income approach methods, adjusted for risk and market conditions, is typical of the oil and gas industry in dealings between buyers and sellers as well as in single- property appraisals. A mineral property's intrinsic value is derived from its ability to generate income by producing oil and/or gas reserves.

Income approach calibration involves the selection of the cost of capital or discount rate appropriate to the type of property being appraised as well as adjusting the projected revenue stream to reflect the individual characteristics of the subject property. The DCF model is also calibrated through the use of lease operating expenses that reflect the individual characteristics of the subject property.

A jurisdictional exception to the DCF model, as this process is described in the Statement on Appraisal Standards No. 2 of the Uniform Standards of Professional Appraisal Practice, must be taken. Section 23.175 (a) of the Texas Property Code specifies that the price of oil and gas used for the first year of the DCF analysis must be the monthly average price of the oil and gas received from the interest for the preceding year multiplied by a market condition factor as promulgated by the Texas Comptroller's office. Furthermore, the prices used for succeeding years are based upon escalation factors also stipulated by the Texas Comptroller's office.

The highest and best use analysis of the oil and gas reserves is based on the likelihood of the continued use of the reserves in their current use. An appraiser's identification of a property's highest and best use is always a statement of opinion, never a statement of fact.

## Review and Testing

Review of appraisals is performed through a comparison of income indicators and compliance with Section 23.175 of the Texas Property Tax Code. A review of property values with respect to year-to-year changes and with respect to industry-accepted income indicators is conducted annually. The periodic reassignment of properties among appraisers or the review of appraisals by an experienced appraiser also contributes to the review process.

Appraisal-to-sales ratios are the preferred method for measuring performance, however sales are very infrequent and often the sales conditions are not made public for the sales that do occur.

Furthermore, market transactions normally occur for multiple sites and include real and personal property, tangible and intangible, making analysis difficult and subjective. Performance is also measured through comparison with valid single-property appraisals submitted for staff review. Finally, Pickett's mineral appraisal methods and procedures are subject to review by the Property Tax Assistance Division of the Texas Comptroller's office. The Comptroller's review, as well as comparisons with single-property appraisals, indicates the validity of the models and the calibration techniques employed.

Thomas Y. Pickett & Company, Inc.  
 Reappraisal Timeline 2025

Event	2024			2025												2026					
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
New Mineral Lease Discovery																					
Schedule ARB Date, Establish Deadlines for 25.19 Data																					
Mineral Property Appraisals																					
Mineral Appraisals Released to TYP Website																					
Informal Meetings with Owners and Agents																					
Estimates of Certified Value to CAD																					
Delivery of 29.19 Notices																					
Appraisal Review Board Hearings																					
Certified Values to CAD/Data to Software Vendor																					
Address 25.25 Correction Protests/Supplements as Necessary																					
Submit Data for Property Value Study																					
Review Category G Ratios/Informal Hearing if Necessary																					
File Formal PVS Protests as Necessary																					
CAD and Joint TYP/CAD Tasks																					
TYP Mineral Department Tasks																					
Milestones and Deadlines																					

**Comanche County Appraisal District**  
**Industrial Property**  
**2025-26 Appraisal Procedures and Reappraisal**  
**Plan**

**August 13, 2024**

*by*

*Thomas Y. Pickett & Company, Inc.*

# SUMMARY REVALUATION PROGRAM REPORT

## INDUSTRIAL PROPERTY

### Overview

Industrial property consists of processing facilities and related personal property. Thomas Y. Pickett & Co., Inc. ("Thomas Y. Pickett" or "Pickett") is contracted to reappraise this type of property annually for the appraisal district. The completed appraisals are all retrospective in nature. The purpose of the appraisals is to estimate market value as of January 1 in accordance with the definition of market value established in the Texas Property Tax Code (Sec. 1.04). "Market value" means the price at which a property would transfer for cash or its equivalent under prevailing market conditions if:

- A. exposed for sale in the open market with a reasonable time for the seller to find a purchaser.
- B. both the seller and the purchaser know of all the uses and purposes to which the property is adapted and for which it is capable of being used and of the enforceable restrictions on its use; and
- C. Both the seller and purchaser seek to maximize their gains, and neither is in a position to take advantage of the exigencies of the other.

The effective date of the appraisals is January 1 of the year for which this report is submitted unless the property owner or agent has applied for and been granted September 1 inventory valuation as allowed by Section 23.12(f) of the Texas Property Tax Code.

The appraisal results will be used as the tax base upon which a property tax will be levied. The properties are appraised in fee simple in conformance with the Texas Property Tax Code Sec.

25.06. This is a jurisdictional exception to the Standards Rule 6-5 (c) Comment of the Uniform Standards of Professional Appraisal Practice. A listing of the industrial properties appraised by Pickett for the appraisal district is available at the appraisal district office. Industrial properties are re-appraised annually. Properties are inspected annually where necessary and at least bi- annually.

Documents relevant to an understanding of these appraisals include the confidential rendition, if any, filed with the appraisal district by the owner or agent of the property; other reports described in the Texas Property Tax Code; asset lists and other confidential data supplied by the owner or agent; the General Appraisal Manual adopted by the Texas Comptroller of Public Accounts; Property Assessment Valuation published by the International Association of Assessing Officers and adopted by the Texas Comptroller of Public Accounts; and Engineering Valuation and Depreciation by Marston, Winfrey and Hempstead; and the Texas Property Tax Code.

Pickett's industrial appraisal staff includes licensed engineers as well as experienced appraisers who are knowledgeable in all three approaches to value. Industrial appraisal staff stays abreast of current trends affecting industrial properties through review of published materials, attendance at conferences, course work and continuing education. All industrial appraisers are registered with the Texas Board of Tax Professional Examiners.

#### Assumptions and Limiting Conditions

All appraisals are subject to the following assumptions and limiting conditions:

1. Title to the property is assumed to be good and marketable and the legal description correct.
2. No responsibility for legal matters is assumed. All existing liens, mortgages or other encumbrances have been disregarded and the property is appraised as though free and clear, under responsible ownership and competent management.
3. The appraisers developing these appraisals are not required to give testimony or attendance in court by reason of the appraisals, unless directed by, employed by, and provided legal counsel by the Appraisal District.
4. The appraisers do not necessarily inspect every property every year.
5. All sketches on the appraisal documents are intended to be visual aids and should not be construed as surveys or engineering reports unless otherwise specified.
6. All information in the appraisal documents have been obtained by members of Thomas Y. Pickett's staff or by other reliable sources.
7. The appraisals were prepared exclusively for ad valorem tax purposes.
8. The appraisers have inspected as far as possible, by observation, the improvements being appraised; however, it is not possible to personally observe conditions beneath the soil or hidden structural components within the improvements. Therefore, no representations are made as to these matters unless specifically considered in an individual appraisal.

## Discovery Process and Procedures

Data is collected as part of the inspection process and through later submissions by the property owner. Submitted data may be on a rendition form or in other modes that require confidentiality. Subject property data is verified through previously existing records and through published reports. Additional data are obtained and verified through published sources, regulatory reports and through analysis of comparable properties, if any. Due to the unique nature of many industrial properties, there is no standard data collection form or manual.

## Valuation Approach and Analysis

The three generally accepted approaches used in determining the Market Value of assets are the cost, income, and market approaches. The following is a brief description of the three general approaches to value.

### Cost Approach

The cost approach considers the replacement cost of an asset as an indicator of value. The cost approach is based on the assumption that a prudent investor would pay no more for an asset than the amount for which he could replace or recreate the asset. The cost approach is sometimes performed by estimating the replacement cost of an asset functionally similar to the subject. Often, historical cost data can be used to indicate the current cost of reproduction or replacement. Adjustments are made for physical deterioration and the functional and economic obsolescence of the appraised asset.

### Income Approach

The income approach measures the present worth of anticipated future net cash flows generated by the subject assets. The net cash flows are forecast for an appropriate period or capitalized in the case of a single period model, and then discounted to present value using an appropriate discount rate.

### Market Approach

The market approach is performed by observing the price at assets comparable to the subject asset are bought and sold. Adjustments are made to the data to account for capacity differences and other relevant differences between the subject asset and the comparable assets.

Depending on the facts and circumstances of a particular appraisal, applying the three approaches independently of one another can yield conclusions that are substantially different. As the appraisal is performed, the strengths of the individual approaches are considered and the influence of each approach in the appraisal process is weighed according to its likely accuracy.

Industrial properties are generally appraised using replacement/reproduction cost new less depreciation models. Replacement costs are estimated from published sources, other publicly available information and comparable properties. Reproduction costs are based on actual investment in the subject or comparable properties adjusted for typical changes in cost over time. Depreciation is calculated on the age/life method using typical economic lives and depreciation rates based on published sources, market evidence and the experience of knowledgeable appraisers. Adjustments for functional and economic obsolescence may be made if utilization and income data for the subject property justify such. Income Approach models (direct capitalization and discounted cash flow) are also used when economic and/or

subject property income information is available. Capitalization and discount rates are based on published capital costs for the industry of the subject property. A market data model based on typical selling prices per unit of capacity is also used when appropriate market sales information is available.

Because cost information is the most readily available type of data, the cost approach model is almost always considered and used. If sufficient data is available, either or both of the other two models are considered and may be used. The market data and income approach models must be reduced by the value of the land in order to arrive at a value of improvements and personal property.

Model calibration in the cost approach involves the selection of the appropriate service life for each type or class of property. Further calibration can occur through the use of utilization or through-put data provided by the owner or agent. Income approach calibration involves the selection of the cost of capital or discount rate appropriate to the type of property being appraised as well as adjusting the projected income stream to reflect the individual characteristics of the subject property. Model calibration in the market data approach involves adjusting sales prices of comparable properties to reflect the individual characteristics of the subject property.

In reconciling multiple model results for a property, the appraiser considers the model results that best address the individual characteristics of the subject property while maintaining equalization among like properties. Final results for each property may be found on the appraisal district's appraisal roll.

Land valuation for industrial properties is the responsibility of appraisal district staff as is the highest and best use analysis of the site. Sites are analyzed for highest and best use as though they were vacant. Highest and best use analysis of the improvements is based on the likelihood of the continued use of the improvements in their current and/or intended use. An appraiser's identification of a property's highest and best use is always a statement of opinion, never a statement of fact.

## Review and Testing

Field review of appraisals is performed through the regular inspection of subject properties. The periodic reassignment of properties among appraisers or the review of appraisals by an experienced appraiser also contributes to the review process. A statistical review of property value changes is also conducted.

Appraisal-to-sales ratios are the preferred method for measuring performance, however sales are very infrequent. Furthermore, market transactions normally occur for multiple sites and include both real and personal property, tangible and intangible, making analysis difficult and subjective. Performance is also measured through comparison with valid single-property appraisals submitted for staff review. Finally, Pickett's industrial appraisal methods and procedures are subject to review by the Property Tax Assistance Division of the Texas Comptroller's office. The Comptroller's review, as well as comparisons with single-property appraisals, indicates the validity of the models and the calibration techniques employed.

**Comanche County Appraisal District  
Utilities Property  
2025-26 Appraisal Procedures and Reappraisal  
Plan**

**August 13, 2024**

*by*

*Thomas Y. Pickett & Company, Inc.*

# APPRAISAL PROCEDURES AND REAPPRAISAL PLAN

## UTILITY, RAILROAD AND PIPELINE PROPERTIES

### Overview

Utility, railroad, and pipeline properties consists of operating property, excluding land, owned by utility, railroad and pipeline companies and related personal property and improvements. Thomas Y. Pickett & Co., Inc. ("Thomas Y. Pickett" or "Pickett") is contracted to reappraise this type of property annually for the appraisal district. The completed appraisals are all retrospective in nature. The purpose of the appraisals is to estimate market value as of January 1 in accordance with the definition of market value established in the Texas Property Tax Code (Sec. 1.04). "Market value" means the price at which a property would transfer for cash or its equivalent under prevailing market conditions if:

- A. exposed for sale in the open market with a reasonable time for the seller to find a purchaser.
- B. both the seller and the purchaser know of all the uses and purposes to which the property is adapted and for which it is capable of being used and of the enforceable restrictions on its use; and
- C. Both the seller and purchaser seek to maximize their gains and neither is in a position to take advantage of the exigencies of the other.

The effective date of the appraisals is January 1 of the year for which this report is submitted.

The appraisal results will be used as the tax base upon which a property tax will be levied. The properties are appraised in fee simple in conformance with the Texas Property Tax Code Sec.

25.06. This is a jurisdictional exception to the Standards Rule 6-5 (c) Comment of the Uniform Standards of Professional Appraisal Practice 2004. A listing of the utility, railroad and pipeline properties appraised by Pickett for the appraisal district is available at the appraisal district office. All properties are reappraised annually. Such utility, railroad and pipeline properties that are susceptible to inspection (e.g. compressor stations, pump stations, buildings and power plants) are normally re-inspected at least every three years.

Pickett's utility, railroad and pipeline appraisal staff includes licensed engineers as well as experienced appraisers who are knowledgeable in all three approaches to value. The appraisal staff stays abreast of current trends affecting utility, railroad and pipeline properties through review of published materials, attendance at conferences, course work and continuing education. All appraisers are registered with the Texas Board of Tax Professional Examiners.

### Assumptions and Limiting Conditions

All appraisals are subject to the following assumptions and limiting conditions:

1. Title to the property is assumed to be good and marketable and the legal description correct.
2. No responsibility for legal matters is assumed. All existing liens, mortgages or other encumbrances have been disregarded and the property is appraised as though free and clear, under responsible ownership and competent management.
3. The appraisers developing these appraisals are not required to give testimony or attendance in court by reason of the appraisals, unless directed by, employed by, and provided legal counsel by the Appraisal District.
4. The appraisers do not necessarily inspect every property every year.
5. All sketches on the appraisal documents are intended to be visual aids and should not be construed as surveys or engineering reports unless otherwise specified.
6. All information in the appraisal documents have been obtained by members of Thomas Y. Pickett's staff or by other reliable sources.
7. The appraisals were prepared exclusively for ad valorem tax purposes.
8. The appraisers have inspected as far as possible, by observation, the improvements being appraised; however, it is not possible to personally observe conditions beneath the soil or hidden structural components within the improvements. Therefore, no representations are made as to these matters unless specifically considered in an individual appraisal.

## Discovery Procedures and Data Collection

Data is collected as part of the inspection process and through later submissions by the property owner. Submitted data may be on a rendition form or in other modes that require confidentiality. Subject property data is verified through previously existing records and through published reports. Additional data are obtained and verified through published sources, regulatory reports and through analysis of comparable properties. Due to the varied nature of utility, railroad and pipeline properties there is no standard data collection form or manual.

## Valuation Approach and Analysis

The three generally accepted approaches used in determining the Market Value of assets are the cost, income, and market approaches. The following is a brief description of the three general approaches to value.

### Cost Approach

The cost approach considers the replacement cost of an asset as an indicator of value. The cost approach is based on the assumption that a prudent investor would pay no more for an asset than the amount for which he could replace or recreate the asset. The cost approach is sometimes performed by estimating the replacement cost of an asset functionally similar to the subject. Often, historical cost data can be used to indicate the current cost of reproduction or replacement. Adjustments are made for physical deterioration and the functional and economic obsolescence of the appraised asset.

## Income Approach

The income approach measures the present worth of anticipated future net cash flows generated by the subject assets. The net cash flows are forecast for an appropriate period or capitalized in the case of a single period model, and then discounted to present value using an appropriate discount rate.

## Market Approach

The market approach is performed by observing the price at assets comparable to the subject asset are bought and sold. Adjustments are made to the data to account for capacity differences and other relevant differences between the subject asset and the comparable assets.

Depending on the facts and circumstances of a particular appraisal, applying the three approaches independently of one another can yield conclusions that are substantially different. As the appraisal is performed, the strengths of the individual approaches are considered and the influence of each approach in the appraisal process is weighed according to its likely accuracy.

For all pipelines a value is calculated using a Replacement Cost New Less Depreciation (RCNLD) model. This involves first calculating the cost of building a new pipeline of equal utility using current prices. The Replacement Cost New (RCN) is a function of location, length, diameter and composition. Depreciation is then subtracted from RCN to produce the final value estimate. Depreciation is defined as the loss of value resulting from any cause. The three common forms of depreciation are physical, functional and economic. Physical depreciation is accounted for on the basis of the age of the subject pipeline. Functional and economic obsolescence (depreciation) can be estimated through the use of survivor curves or other normative techniques. Specific calculations to estimate abnormal functional and/or economic obsolescence can be made on the basis of the typical utilization of the subject pipeline.

After deductions from RCN have been made for all three forms of depreciation, the remainder is the RCNLD or cost approach model indicator of value.

In addition to the RCNLD indicator, a unit value model may also be used for those pipelines for which appropriate income statements and balance sheets are also available. Generally, this model is used for those pipelines that by regulation are considered to be common carriers. The unit value model must be calculated for the entire pipeline system.

The unit value model typically involves an income approach to value and a rate base cost approach. The income approach is based on a projection of expected future typical net operating income (NOI). The projected NOI is discounted to a present worth using a current cost of capital that is both typical of the industry and reflective of the risks inherent in the subject property. The unit value model cost approach is typically an estimation of the current rate base of the subject pipeline (total investment less book depreciation allowed under the current form of regulation). An additional calculation is made to detect and estimate economic obsolescence. Any economic obsolescence is deducted from the rate base cost less book depreciation to achieve a final cost indicator. The unit value model may also include a stock and debt approach in lieu of a market data approach. The stock and debt approach involves finding the total value of the owner's liabilities (equity and debt) and assuming that they are equal to the value of the assets. The two (or three, if the stock and debt approach is included) unit value indicators are then reconciled into a final unit appraisal model indicator of value. The unit value must then be reconciled with

the RCNLD model indicator of value for the entire pipeline system being appraised. The final correlated value of the system can then be allocated among the various components of the system to determine the tax roll value for each pipeline segment.

Utility and railroad properties are appraised in a manner similar to pipeline except the RCNLD model is not used. For all three types of property (utility, railroad and pipeline) the appraiser must first form an opinion of highest and best use. If the highest and best use of the operating property is the current use under current regulation, the unit value model is considered highly appropriate. If the highest and best use is something different, then the RCNLD model may be more appropriate.

Compressor stations, pump stations, improvements and related facilities are appraised using a replacement cost new less depreciation model.

Model calibration in the RCNLD model involves the selection of the appropriate service life for each type or class of property. Further calibration can occur through the use of utilization or through-put data provided by the owner or agent. Model calibration in the unit value cost approach involves the selection of the appropriate items to include in the rate base calculation and selection of the best measure of obsolescence, if any. Income approach calibration involves the selection of the cost of capital or discount rate appropriate to the type of property being appraised as well as adjusting the projected income stream to reflect the individual characteristics of the subject property. Model calibration in the stock and debt approach involves allocating sales prices of debt and equity to reflect the contribution to value of the operating property of the subject property.

In reconciling multiple model results for a property, the appraiser considers the model results that best address the individual characteristics of the subject property while maintaining equalization among like properties. Final results for each property may be found on the appraisal district's appraisal roll.

Land valuation for utility and pipeline properties is the responsibility of appraisal district staff as is the highest and best use analysis of the site. Sites are analyzed for highest and best use as though they were vacant. Highest and best use analysis of the improvements is based on the likelihood of the continued use of the improvements in their current and/or intended use. Railroad corridor land is included in the appraisal of the operating property. The highest and best use of railroad corridor land is presumed to be as operating property. An appraiser's identification of a property's highest and best use is always a statement of opinion, never a statement of fact.

The rate-base cost approach, stock and debt approach and income approach models must be reduced by the value of the land in order to arrive at a value of improvements, personal property and other operating property.

## Review and Testing

Field review of appraisals is performed through the regular inspection of subject properties. The periodic reassignment of properties among appraisers or the review of appraisals by an experienced appraiser also contributes to the review process. A statistical review of property value changes is also conducted.

Appraisal-to-sales ratios are the preferred method for measuring performance, however sales are very infrequent. Furthermore, market transactions normally occur for multiple sites and include both real and personal property, tangible and intangible, making analysis difficult and subjective. Performance is also measured through comparison with valid single-property appraisals submitted for staff review. Appraisal results are tested annually by the Property Tax Assistance Division of the Texas Comptroller's office. The Comptroller's review, as well as comparisons with single-property appraisals, indicates the validity of the models and the calibration techniques employed.

# **Appendix A Resumes**

*Thomas. Y. Pickett & Company, Inc.*

## **LEONARD B. AMENT**

Industrial Appraiser

### **EXPERIENCE**

Thomas Y. Pickett & Company, Inc.

17 Years

Industrial / Manufacturing

24 Years

### **QUALIFICATIONS**

Mr. Ament has over twenty years experience in Industrial, Commercial and Oilfield Service and Manufacturing Industries. During this time-frame he has worked with a variety of equipment and processes from the manufacturing of drilling rig components, chemical mixing and packaging, high- speed electronics assembly, to managing a portable air conditioning rental and sales company. Mr. Ament brings valued experience in a variety of industries. He joined Thomas Y Pickett in 2007 as an Industrial Appraiser. He inspects and appraises SWD (taxable) and other facilities in North Dakota.

## **EDUCATION**

Mechanical Drawing, Electrical Appliance Repair, DECA Brookhaven  
Community College

Comprehensive User Course on Phillips Gem Series Surface Mount Machines Registered  
Professional Appraiser – State of Texas # 72436

### **PROFESSIONAL ASSOCIATION**

Texas Department of Licensing & Regulation-Property Tax Professional

**JOSH BUDOWSKY**  
Manager of the Industrial/Utilities - Appraiser

**EXPERIENCE**

Thomas. Y. Pickett & Company, Inc. (Dallas) Property Tax Appraiser	8 Years
Baker Hughes Inc. Sales Manager	9 Years
Aviall Service Inc. Account Executive	2 Years
Bud Oil Company Production Technician	5 Years
Oklahoma State University Bachelor of Business Administration Marketing Management of Information Systems	4 Years

**QUALIFICATIONS**

Performs industrial evaluations on complex manufacturing sites as well as energy production, energy transmission, and pipeline systems in various states. He is also responsible for evaluation of clean renewable energy production systems, such as solar power and wind power. He is experienced in the oil and gas industry after spending nine years at a service company, giving him exposure to all high-profile production fields across the United States. This experience included enhancements to the drilling and completions of complex and challenging oil and gas wells. He was solely responsible for the increase of revenue and profits while directing the sales and operations in the Southern region for Baker Hughes.

**EDUCATION/LICENSES**

B.A. in Business Marketing – Oklahoma State University

B.A. in MIS – Oklahoma State University

**PROFESSIONAL ASSOCIATION**  
Property Tax Appraiser - State of Texas - License #75123

Texas Department of Licensing & Regulation-Property Tax Professional

## MICHAEL B. PARKS

**Vice President - Director**  
Mineral Appraiser

### EXPERIENCE

Thomas Y. Pickett & Company, Inc.	16 Years
JPMorgan Chase Bank	2 Years
Greene & Associates, Inc.	6 Years

### QUALIFICATIONS

Mr. Parks performs appraisals of mineral properties in Texas. He currently works five counties in Texas alone and assists with multiple other counties. He handles all aspects of the appraisal process including new well discovery, appraisal of all leases, working with operators to obtain accurate data to assist the appraisal process, handling protests, defending values at the appraisal review board hearings and certifying the values. He has extensive experience managing private mineral interests. Mr. Parks is active in the operations of Thomas Y. Pickett and is Manager of the Dallas office.

### EDUCATION/LICENSE

Bachelor of Science - University of North Texas – Denton, TX  
Registered Professional Appraiser – State of Texas #72761  
Certified Mineral Manager

### PROFESSIONAL ASSOCIATION

Texas Department of Licensing & Regulation-Property Tax Professional  
National Association of Royalty Owners  
National Association of Lease and Title Analysts  
American Association of Professional Landmen

**ROBERT T. (BOB) LEHN**  
Vice President

**Experience**

Thomas Y. Pickett & Company, Inc. (Dallas)	33 Years
Purvin & Gertz, Inc. (Dallas & London) Associate	1 Year
Hadson Gas Systems, Inc. (Houston, Dallas & London) Manager – Projects & Facilities (Dallas) Director – Gas Supply & Transportation (London)	4 Years
Muse, Stancil & Company (Dallas) Consultant	2 Years
Amoco Production Company (USA) (Chicago, Corpus Christi, Houston) Staff Plant Engineer	8 Years

**Qualifications**

Mr. Lehn performs industrial valuations of railroads, pipeline, gas gathering and processing facilities and of many other complex manufacturing sites in various states. He is experienced in domestic and international energy project management. This experience included performing economic evaluations with consideration of environmental and regulatory issues. Reports to senior management of operating companies and to governmental agencies were made. Prior to T.Y. Pickett, as a consultant, he performed fair market valuations and physical asset appraisals of large gas plants and pipelines as well as other facilities. Mr. Lehn continues appraising these facilities, along with others, including paint pigment, explosives and agrichemical (fertilizer, pesticides, ethanol) and petrochemical plants. Mr. Lehn's previous and current refinery appraisal assignments include sites in the following states: Kansas, Mississippi, North Dakota, Oklahoma, Texas and Wyoming. Expert testimony has been provided on several refineries and on other special purpose properties to Boards of Equalization, to Appraisal Review Boards, or to Courts and to State Tax Commissions in Texas, Oklahoma, North Dakota, Kansas, Louisiana, Wyoming, Mississippi and in Florida. He has spoken at the Annual IAAO Conferences, at the IAAO Legal Seminars and at regional and at various State and County Assessors' functions and at other venues.

**Education/Licenses**

Master of Chemical Engineering – Rice University – Houston, Texas  
B.A. in Chemical Engineering – Rice University – Houston, Texas  
Professional Engineer – State of Texas – License #73203  
Registered Professional Appraiser – State of Texas – License #67474

**Professional Associations**

American Institute of Chemical Engineers  
American Chemical Society  
Texas Association of Appraisal Districts  
Texas Association of Assessing Officers  
International Association of Assessing Officers (IAAO)  
-- Associate Member, Ethics Committee (2010-2012)

# EDWARD DONALD OWENS

Vice President

Senior Appraiser

## EXPERIENCE

Thomas Y. Pickett & Company, Inc.	35 Years
Fina Oil & Chemical	2 Years
Pritchard & Abbott	11 Years

## QUALIFICATIONS

Mr. Owens has forty-two years (42) experience in appraising mineral, industrial, commercial, and personal properties. He also values, for Pickett clients, all fiber optic cables in Texas. He has served as contract supervisor for various appraisal districts in South Central and West Central Texas. He is a former tax agent with a major oil firm and is now responsible for his assigned oil-related properties in Texas, Wyoming, Colorado and New Mexico. He inspects and appraises gas plants, railroad loading facilities and SWD (taxable) facilities in North Dakota.

## EDUCATION

Bachelor of Science – Business Administration – Southwestern University – Salt Lake City, Utah

Associate in Applied Science – Property Tax Appraisal – Tarrant County Junior College, Fort Worth, Texas

Associate in Applied Science – Mid-Management – Tarrant County Junior College, Fort Worth, Texas

Registered Professional Appraiser – State of Texas #00896

**PROFESSIONAL ASSOCIATION**

Texas Department of Licensing & Regulation-Property Tax Professional

## **Appendix B**

### **Industrial Utility Accounts**

*Thomas Y. Pickett & Company, Inc.*



2 K MCILVAIN LLC  
ADM - ALLIANCE NUTRITION  
ALENCO COMMUNICATIONS INC  
AMERICAN PLANT FOOD CORP  
AMERICAN TOWERS LLC TX  
ARCHER DANIELS MIDLAND CO  
AT&T MOBILITY LLC  
ATMOS ENERGY/MID-TEX DISTRIBUT  
ATMOS ENERGY/MID-TEX PIPELINE  
BIG CREEK CONSTRUCTION, LTD  
BRAZOS ELECTRIC POWER COOP  
BRENNAN TRIPLE B PARTNERSHIP L  
BRENNAN VINEYARDS  
BREVILOBA, LLC  
BRIDGETEX PIPELINE COMPANY LLC  
BRIGHTSPEED OF EASTERN TEXAS I  
CARAWAY, C M & SONS  
CELLCO PARTNERSHIP  
CENTURYLINK COMMUNICATIONS LLC  
CHAPARRAL PIPELINE CO LLC  
CHAPTER TWO, LLC  
CITIZENS ASSET FINANCE FKA RBS  
CITY OF COMANCHE  
COLT GATHERING (NORTH TEXAS)  
COMANCHE COUNTY WATER SUPPLY C  
COMANCHE ELECTRIC COOP ASSN  
COMANCHE GAS SOLUTIONS, LLC  
COMANCHE TRANSLOADING & COLD S  
COMO HOLDING TOWERS  
CONTERRA ULTRA BROADBAND LLC  
CROWN COMMUNICATION INC  
DCS TOWER SUB LLC  
DE LEON SG NUT COMPANY  
DIRECTV LLC  
DISH NETWORK LLC  
DOLLINS PECAN CO INC  
E2M US LLC  
ECOLOGY REVOLUTION INC  
ENERGY TRANSFER GC NGL PIPELIN  
ENTERPRISE TEXAS PIPELINE LLC  
ETP CRUDE LLC  
FARLEY FEED & SUPPLY  
FERTI-TEX LLC  
FLAMINGO GAS, INC  
FLAT TOP WIND I LLC

FRONTIER COMMUNICATIONS  
FRONTIER COMMUNICATIONS  
FT WORTH & WESTERN RAILROAD CO  
GORMAN MILLING COMPANY INC  
GTP TOWERS I LLC  
HAMILTON COUNTY ELE COOP  
HDI HOLDINGS  
HELENA CHEMICAL CO  
HI-PRO FEEDS LLC  
HSC RENTALS INC  
HUGHES NETWORK SYSTEMS LLC  
INNOBLOCK TECHNOLOGY INC  
JC NOLAN  
LINDE GAS & EQUIPMENT INC  
LIQUIDPOWER SPECIALTY PRODUCTS  
LOGAN'S GAP WIND I LLC  
LONE STAR SOLAR COMANCHE FACIL  
LONE STAR TRANSMISSION  
MAGELLAN PIPELINE CO LP (PIPE)  
MCI COMMUNICATIONS SERVICES  
MCI METRO ACCESS TRANSMISSION  
MID TEX CELLULAR LTD  
NEXTLINK INTERNET  
NUTRIEN AG SOLUTIONS INC  
ONCOR ELECTRIC DELIVERY CO LLC  
PARKER GAS CO INC  
PATTERN OPERATORS  
PINTAIL PIPE LLC  
PRATER DIRT WORK, LLC  
PRATER EQUIPMENT  
PRATER-PIRKLE LAND CO  
ROGERS EXPRESS  
SBA STEEL II  
SBA STRUCTURES, INC  
SBA TOWERS X, LLC  
SIEMENS GAMESA RENEWABLE ENERGY  
SMYRNA READY MIX CONCRETE LLC  
STEPHENS, RODNEY P & SHEILA  
STOCKMAN SEED & FERTILZER  
SURE GROW AGRICULTURE PRODUCTS  
SURE GROW TRANSPORTATION INC  
TAURUS GAS SERVICES, LP  
TEXAS CENTRAL RAILROAD  
TEXAS COMM OF BROWNWOOD  
TEXAS-NEW MEXICO POWER CO

TILLMAN INFRASTRUCTURE  
T-MOBILE WEST LLC  
TOKENOMICS DIGITAL TECH CORP  
TOTELCOM COMMUNICATIONS LLC  
TOTELCOM NETWORKS  
U S SAND & GRAVEL  
UNICORN MINING LLC  
UNITED COOPERATIVE SVCS INC  
UPPER LEON RIVER MUNICIPAL WAT  
VALOR TELECOM OF TEXAS LP  
VERTICAL BRIDGE 500 LLC  
VOLLEMAN DAIRY PROCESSING LAND  
VOLLEMAN DAIRY PROCESSING LLC  
VULCAN MATERIALS CO

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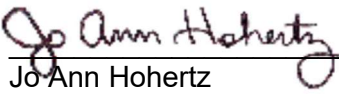
## ***LIMITING CONDITIONS***

The appraised value estimates provided by the district are subject to the following conditions:

1. The appraisals were prepared exclusively for ad valorem tax purposes.
2. The property characteristic data upon which the appraisals are based is assumed to be correct. Exterior inspections of the property appraised were performed as staff resources and time allowed. Some interior inspections of property appraised were performed at the request of the property owner and required by the district for clarification purposes and to correct property descriptions.
3. Validation of sales transactions was attempted through questionnaires to buyer and seller, telephone survey and field review. In the absence of such confirmation, residential sales data obtained from vendors was considered reliable.
4. I have attached a list of staff providing significant mass appraisal assistance to the person signing this certification.

### ***Certification Statement:***

"I, Jo Ann Hohertz, Chief Appraiser for the Comanche Central Appraisal District, solemnly swear that I have made or caused to be made a diligent inquiry to ascertain all property in the district subject to appraisal by me, and that I have included in the records all property that I am aware of at an appraised value which, to the best of my knowledge and belief, was determined as required by law."

  
\_\_\_\_\_  
Jo Ann Hohertz  
Chief Appraiser

## CCAD STAFF PROVIDING SIGNIFICANT MASS APPRAISAL ASSISTANCE

<u>NAME</u>	<u>TITLE</u>	<u>TDLR NUMBER</u>
Jo Ann Hohertz	Chief Appraiser	#69935
Sandra Garcia	Deputy/Personal Property Appraiser	#71591
Sandy Steward	Appraisal Director	#71819
Tim Matthews	Appraiser	#75250
Tawney Aldape	BA & Appraiser	#77450
Richard Petree	Consultant (Western Valuation)	#16308

### Thomas Y Pickett Appraisal Staff:

<b>NAME</b>	<b>TDLR #</b>	<b>APPRAISAL RESPONSIBILITY</b>
MICHAEL B. PARKS	72761	MINERALS
JOSH BUDOWSKY	75123	UTILITIES
LEONARD B. AMENT	72436	INDUSTRIAL
EDWARD DONALD OWENS	00896	INDUSTRIAL

# Appendix A: 2025-2026 Calendar of Key Activities

## ***\*\*Disclaimer\*\****

*This Calendar may be modified to meet the requirements of the tax code by this office. Also, PTC 1.06 provides that if the last day for the act is Saturday, Sunday or legal state or national holiday, the act is timely if performed on the next business day.*

### **PROJECTED DATE**

### **REAPPRAISAL RELATED ACTIVITIES**

#### **July 2024**

- ✓ July 20 - Appraisal Review Board (ARB) Approves Appraisal Records to Create Appraisal Roll
- ✓ July 25 - Chief Appraiser Certifies Appraisal Roll to Taxing Unit Assessors
- ✓ Chief Appraiser Prepares Reappraisal Plan
- ✓ Property owners apply for Sept. 1 inventory appraisal for next year 7/31 PTC 23.12 (f)
- ✓ Finish Ag/WLM inspection.
- ✓ Office Roundtable Discussion

#### **August 2024**

- ✓ Training for Field Data Collection – subject to extension
- ✓ Begin Appraisal Field Work 1/3 of County– subject to extension
- ✓ In House Ratio Study Review for Accuracy
- ✓ Texas Association of Appraisal Districts (TAAO) Annual Conference
- ✓ System Rollover of Data Records to Begin New Appraisal Year
- ✓ Newspaper Publication on Notice of Hearing on Budget (Sec. 6.062)
- ✓ Comptroller certifies PVS final results to Commissioner of Education Sec. 9.4317 (d)
- ✓ Property owners apply for Sept. 1 inventory appraisal for next year 7/31 PTC 23.12 (f)
- ✓ Aug. 1 - Electronic Property Transaction Submission due to Comptroller
- ✓ Aug 7 - Deliver Notice to each taxpayer in CAD stating estimated taxes may be found on county TNT database PTC 26.17 & PTC 26.04 (e2)
- ✓ Aug. 1 - Electronic Property Transaction Submission due to Comptroller
- ✓ Office Roundtable Discussion

#### **September 2024**

- ✓ Even years BOD holds hearings on Reappraisal Plan and submit to comptroller and entities after adopted.
- ✓ Continue Appraisal Field Work 1/3 of County
- ✓ Newspaper Publication on Notice of Hearing on Budget (Sec. 6.062)
- ✓ Sept. 1 - Statutory Appraisal Date for Certain Inventory Properties (Sec. 23.12)
- ✓ Labor Day-District Closed
- ✓ Sept. 15 - Statutory Deadline for CCAD Board of Directors to Approve Budget & Reappraisal Plan. Sec 6.06 (b & i)
- ✓ Submit Budget to Entities
- ✓ Taxing unit's quarterly payment due before 10/1. Sec. 6.06
- ✓ Sept. 29 - Last day for taxing unit to adopt rates PTC 26.05 (a & c)
- ✓ Office Roundtable Discussion

## October 2024

- ✓ Continue Appraisal Field Work 1/3 of County
- ✓ Taxing Units Mail Bills - Appraisal Support & Customer Service
- ✓ Columbus Day-District Closed
- ✓ CAD submit Tax Rate Submission Spreadsheet & Property Value Reports by 10/15
- ✓ Comptrollers Annual Conference on Property Taxation-Austin TX
- ✓ Office Roundtable Discussion
- ✓ Texas Rural Chief Appraiser Conference

## November 2024

- ✓ Complete Appraisal Field Work 1/3 of County – subject to extension
- ✓ In House Ratio Study Review for Accuracy
- ✓ Appraiser in house review
- ✓ Veteran's Day-CCAD Closed
- ✓ Thanksgiving Holiday-CCAD Closed
- ✓ Review & Return PTD Clerical Error Report for Property Value Study
- ✓ Office Roundtable Discussion
- ✓ Nov. 30 – Pay ½ taxes pursuant to 31.03a

## December 2024

- ✓ Christmas Holiday - CCAD Closed
- ✓ Obtain personnel & equipment.
- ✓ Update guides
- ✓ Finish Building Permit Data Entry
- ✓ Review ARB & BOD terms of office.
- ✓ Finish Appraisal Field Work 1/3 of County-subject to extension
- ✓ PVS pre-preliminary data release clerical corrections from CAD due in 3 weeks
- ✓ Taxing unit's quarterly payment due before 1/1. Sec. 6.06
- ✓ Office Roundtable Discussion

## January 2025

- ✓ MAP review begins.
- ✓ Begin Building Permit Field Reviews, Sold Property Inspections & AG/Wildlife– subject to extension
- ✓ New Year's Day-CCAD Closed
- ✓ ARB begins a 2-year term. Sec. 6.41 (e)
- ✓ ARB training registration
- ✓ Jan. 1 - Statutory Appraisal Date for Most Categories of Taxable Property
- ✓ Newspaper Publication about Renditions Sec 22.21
- ✓ Public information packet released by PTAD.
- ✓ Mail Business Personal Property Rendition Forms – subject to extension
- ✓ In House Ratio Study Review for Accuracy
- ✓ Martin Luther King Day-CCAD Closed
- ✓ Jan. 31 – Deadline for the Comptroller's office to publish the preliminary *School District Property Value Study* findings, certify findings to the Texas commissioner of education, and deliver findings to each school district (Gov't Code Sec. 403.302(g)).
- ✓ Begin PVS Appeals Preparations 1/31
- ✓ End of year mailing of HS & AG application Sec 11.44a & Sec. 23.43e
- ✓ Office Roundtable Discussion

- ✓ Jan 31 - Last day for CAD to give public notice of cap rate to use I that year to appraise low-and moderate-income housing Ex. (11.1825)
- ✓ Jan. 31 – Last day to pay taxes before delinquent
- ✓ Jan. 31 – Last day to file AG Application for heirs
- ✓ Office Roundtable Discussion

## **February 2025**

- ✓ Continue Building Permit Field Reviews, Sold Property Inspections & AG/Wildlife
- ✓ Texas Association of Appraisal Districts (TAAD) Annual Conference
- ✓ President's Day-CCAD Closed
- ✓ Begin Working Business Personal Property Renditions
- ✓ Feb. 1 - Electronic Property Transaction Submission due to Comptroller
- ✓ Office Roundtable Discussion
- ✓ Feb 1 Last Day for motor vehicle, vessels and outboard motors, heavy equipment, and manufactured housing dealers to file dealer's inventory declarations (Secs. 23.121(f), 23.124(f), 23.1241(f), 23.127(f)).
- ✓ End of February complete 1/1 appraisal check (Subject to extensions)

## **March 2025**

- ✓ Finish Building Permit Field Reviews, Sold Property Inspections & Ag/Wildlife-subject to extension.
- ✓ In House Ratio Study Review for Accuracy
- ✓ Taxing unit's quarterly payment due before 4/1. Sec. 6.06
- ✓ Comptroller's Operations Survey Due
- ✓ Deadline to Submit Property Value Study Appeals Evidence to Comptroller
- ✓ March 31 - Notify tax unit of Roll Format 26.01 (a)
- ✓ Office Roundtable Discussion

## **April 2025**

- ✓ April 1 - Last day (or as soon as practicable thereafter) for chief appraiser to mail notices of appraised value for single-family residence homestead properties (Sec. 25.19(a)).
- ✓ April 1 - Last day (or as soon thereafter as practicable) for chief appraiser to deliver a clear and understandable written notice to property owner of a single-family residence that qualifies for an exemption under Sec. 11.13 if an exemption or partial exemption that was approved for the preceding year was canceled or reduced for the current year (Sec. 25.193(a)).
- ✓ Ratio Study Review for Appraisal Notice Process
- ✓ Continuing AG/Wildlife inspections.
- ✓ Newspaper Publication on Renditions, HS, AG, Deferrals, & Disabled Veterans
- ✓ Begin Preparation for Budget
- ✓ Employee Performance Reviews-Discussions with Staff
- ✓ Review District Policies & Employee Benefits
- ✓ Begin Application of Neighborhood Market Adjustments
- ✓ April 15 Last Day to file renditions and property reports on most property types. Chief appraiser must extend the deadline to May 15 upon written request (Sec. 22.02(a)).
- ✓ Mail Failure to file Rendition by April 15th Letter – subject to extension
- ✓ Good Friday-CCAD Closed
- ✓ Process all Applications & Deeds

- ✓ Finalize Changes Prior To Notice Run
- ✓ Office Roundtable Discussion
- ✓ April 30 - Deadline to File Abatement
- ✓ April 30 – Last day for taxpayers to file AG application or notice that property no longer qualifies for 1-d 1. (Sec. 11.43(g)); 23.54(d)
- ✓ April 30 – Last day to request separate listing of UDI Section 25.11 (b) or request joint taxation of mineral interest Section 25.12 (b)
- ✓ April 30 - Certify Estimate of Taxable Value to County, Schools & Municipalities (Sec. 26.01(e) (f))

## **May 2025**

- ✓ May 1 - Last day (or as soon as practicable thereafter) for chief appraiser to mail notices of appraised value for properties other than single-family residence homesteads (Sec. 25.19(a)).
- ✓ May 1 – Finish BPP rendition entry– subject to extension
- ✓ Newspaper Publication of Protest and Appeal Procedures & Taxpayer remedies (Sec. 41.41(b) & 41.70(a) (b))
- ✓ Mailing of Real and BPP Appraisal Notices
- ✓ Newspaper Press Release for Notices Mailed
- ✓ Before May 15 - ARB must adopt hearing procedures in Public Hearing & submit to PTAD within 15 days of adoption PTC 1.01 (c & d)
- ✓ May 15 - Chief Appraiser Submit Completed Appraisal Records to ARB (25.01 (a) & 25.22 (a) or as soon as practicable.
- ✓ Begin Informal Appeals– subject to extension
- ✓ May 15 - File BPP Rendition if Extension granted Deadline to May 15th.
- ✓ Memorial Day-CCAD Closed
- ✓ Statutory Deadline to File Appraisal Review Board Protest
- ✓ Property Value Study Appeal Hearings-Austin TX
- ✓ Chief Appraiser evaluation
- ✓ Office Roundtable Discussion

## **June 2025**

- ✓ Appraisal Review Board Hearings Begin – subject to extension
- ✓ June 14 - Submit Proposed Budget to BOD then Taxing units PTC 6.06 (a & i)
- ✓ June 30 - Taxing unit's quarterly payment due before 7/1. Sec. 6.06 (e)
- ✓ June 30 – Pay ½ taxes pursuant to (sec 31.03 (a))
- ✓ Office Roundtable Discussion

## **July 2025**

- ✓ July 20 - Appraisal Review Board (ARB) Approves Appraisal Records to Create Appraisal Roll
- ✓ July 25 - Chief Appraiser Certifies Appraisal Roll to Taxing Units Assessors
- ✓ Property owners apply for Sept. 1 inventory appraisal for next year 7/31 PTC 23.12 (f)
- ✓ Finish Ag/WLM inspection.
- ✓ Even years - Chief Appraiser Prepares Reappraisal Plan
- ✓ Office Roundtable Discussion

## **August 2025**

- ✓ Training for Field Data Collection – subject to extension
- ✓ Begin Appraisal Field Work 1/3 of County – subject to extension
- ✓ In House Ratio Study Review for Accuracy

- ✓ Aug 7 - Deliver Notice to each taxpayer in CAD stating estimated taxes may be found on county TNT database PTC 26.17 & PTC 26.04 (e2)
- ✓ Texas Association of Appraisal Districts (TAAO) Annual Conference
- ✓ System Rollover of Data Records To Begin New Appraisal Year
- ✓ Property owners apply for Sept. 1 inventory appraisal for next year 7/31 PTC 23.12 (f)
- ✓ Comptroller certifies PVS final results to Commissioner of Education Sec. 9.4317 (d)
- ✓ Aug. 1 - Electronic Property Transaction Submission due to Comptroller
- ✓ Newspaper Publication on Notice of Hearing on Budget (Sec. 6.062)
- ✓ Office Roundtable Discussion

#### September 2025

- ✓ Sept. 1 - Statutory Appraisal Date for Certain Inventory Properties. Sec.23.12
- ✓ Sept. 15 - Statutory Deadline for CCAD Board of Directors to Approve Budget Sec. 6.06 (b & i)
- ✓ Continue Appraisal Field Work 1/3 of County
- ✓ Submit Budget to Entities
- ✓ Taxing unit's quarterly payment due before 10/1. Sec. 6.06
- ✓ Sept 29 - Last day for taxing unit to adopt rates PTC 26.05 (a & c)
- ✓ Office Roundtable Discussion

#### October 2025

- ✓ Continue Appraisal Field Work 1/3 of county
- ✓ Before October 15 of each **odd-numbered** year taxing units nominate board of director candidates. Sec 6.03 (g)
- ✓ Taxing Units Mail Tax Bills - Appraisal Support & Customer Service
- ✓ Columbus Day-District Closed
- ✓ CAD submit Tax Rate Submission Spreadsheet & Property Value Reports by 10/15
- ✓ Comptrollers Annual Conference on Property Taxation-Austin TX
- ✓ Before October 30 of each odd-numbered year the chief appraiser prepares a ballot of board of director candidates. Sec 6.03 (j)
- ✓ Office Roundtable Discussion

#### November 2025

- ✓ Complete Appraisal Field Work 1/3 of County – subject to extension
- ✓ In House Ratio Study Review for Accuracy
- ✓ Appraiser In-House Review
- ✓ Veteran's Day-CCAD Closed
- ✓ Thanksgiving Holiday-CCAD Closed
- ✓ Review & Return PTD Clerical Error Report for Property Value Study
- ✓ Office Roundtable Discussion
- ✓ Nov 30 – Pay ½ taxes pursuant to 31.03(a)

#### December 2025

- ✓ Christmas Holiday - CCAD Closed
- ✓ Obtain personnel & equipment.
- ✓ Update guides
- ✓ Finish Building Permit Data Entry
- ✓ Review ARB & BOD terms of office.
- ✓ Finish Appraisal Field Work 1/3 of County-subject to extension

- ✓ True Automation Conference
- ✓ Odd years - Resolution Determining Vote for CAD BOD Due to Chief
- ✓ Odd years - Results of BOD Election due to Entities & candidates
- ✓ Taxing unit's quarterly payment due before 1/1. Sec. 6.06
- ✓ Odd years - Dec. 15 - Each taxing entity entitled to vote must determine its vote by resolution and submit it to the Chief Appraiser before Dec. 15. Sec 6.03 (k)
- ✓ Odd years - The chief appraiser shall count the votes and submit the results before December 31 to the governing body of each taxing unit in the district and to the Board of Director candidates. Sec 6.03 (k)
- ✓ PVS pre-preliminary data release clerical corrections from CAD due in 3 weeks
- ✓ Office Roundtable Discussion

## January 2026

- ✓ New Year's Day-CCAD Closed
- ✓ Begin Building Permit Field Reviews, Sold Property Inspections & AG/Wildlife– subject to extension
- ✓ Even Years - CCAD Board of Directors begin 2-year terms.
- ✓ ARB begins a 2-year term. Sec. 6.41 (e)
- ✓ ARB training registration
- ✓ Jan. 1 - Statutory Appraisal Date for Most Categories of Taxable Property
- ✓ Public information packet released by PTAD.
- ✓ Newspaper Publication about Renditions
- ✓ Mail Business Personal Property Rendition Forms – subject to extension
- ✓ In House Ratio Study Review for Accuracy
- ✓ Begin Building Permit Field Reviews & Sold Property Inspections
- ✓ End of year mailing of HS & AG application Sec 11.44a & Sec. 23.43e
- ✓ Martin Luther King Day-CCAD Closed
- ✓ Jan. 31 – Deadline for the Comptroller's office to publish the preliminary *School District Property Value Study* findings, certify findings to the Texas commissioner of education, and deliver findings to each school district (Gov't Code Sec. 403.302(g)).
- ✓ Receive Property Value Study Results from Property Tax Division - Begin Appeals Preparations 1/31
- ✓ Jan 31 - Last day for CAD to give public notice of cap rate to use I that year to appraise low-and moderate-income housing Ex. (11.1825)
- ✓ Jan. 31 – Last day to pay taxes before delinquent
- ✓ Jan. 31 – Last day to file AG Application for heirs
- ✓ Office Roundtable Discussion

## February 2026

- ✓ Texas Association of Appraisal Districts (TAAD) Annual Conference
- ✓ President's Day-CCAD Closed
- ✓ Continue Building Permit Field Reviews, Sold Property Inspections & AG/Wildlife
- ✓ Begin Working Business Personal Property Renditions
- ✓ Feb. 1 - Electronic Property Transaction Submission due to Comptroller
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- ✓ End of February complete 1/1 appraisal check - Subject to extension
- ✓ Office Roundtable Discussion

## **March 2026**

- ✓ Finish Building Permit Field Reviews & Sold Property Inspections-subject to extension.
- ✓ Deadline to Submit Property Value Study Appeals Evidence to Comptroller
- ✓ In House Ratio Study Review for Accuracy
- ✓ Taxing unit's quarterly payment due before 4/1. Sec. 6.06
- ✓ Comptroller's Operations Survey Due
- ✓ March 31 - Notify tax unit of Roll Format 26.01 (a)
- ✓ Office Roundtable Discussion

## **April 2026**

- ✓ April 1 - Last day (or as soon as practicable thereafter) for chief appraiser to mail notices of appraised value for single-family residence homestead properties (Sec. 25.19(a)).
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- ✓ Newspaper Publication on Renditions, HS, AG, Deferrals, & Disabled Veterans
- ✓ Begin Preparation for Budget
- ✓ Employee Performance Reviews-Discussions with Staff
- ✓ Review District Policies & Employee Benefits
- ✓ April 30 - Certify Estimate of Taxable Value to County, Schools & Municipalities (Sec. 26.01e)
- ✓ Ratio Study Review for Appraisal Notice Process
- ✓ Begin Application of Neighborhood Market Adjustments
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- ✓ Mail Failure to file Rendition by April 15th Letter – subject to extension
- ✓ Deadline to File Abatement & AG Application on April 30<sup>th</sup>
- ✓ Good Friday-CCAD Closed
- ✓ Continuing AG/Wildlife inspections.
- ✓ Process all Applications & Deeds
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- ✓ April 30 - Certify Estimate of Taxable Value to County, Schools & Municipalities (Sec. 26.01(e) (f))
- ✓ Office Roundtable Discussion

## **May 2026**

- ✓ Newspaper Publication of Protest and Appeal Procedures (Sec. 41.41 & 41.70b) & Taxpayer Remedies
- ✓ Newspaper Press Release for Notices Mailed
- ✓ Before May 15 - ARB must adopt hearing procedures in Public Hearing & submit to PTAD within 15 days of adoption PTC 1.01 (c & d)

- ✓ Mailing of Real and BPP Appraisal Notices
- ✓ Chief Appraiser Submits Completed Appraisal Records to ARB (25.01 (a) & 25.22 (b) or as soon as practicable
- ✓ Begin Informal Appeals – subject to extension
- ✓ May 15 - File BPP Rendition if Extension granted Deadline to May 15th.
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- ✓ Comptroller certifies PVS final results to Commissioner of Education Sec. 9.4317 (d)
- ✓ Office Roundtable Discussion

## Appendix B: Uncertainties

**The Appraisal District may suspend face-to-face services** to the public inside the building, as part of an effort to reduce the spread of any disease **to keep our community and staff healthy.**

The pandemic changed how the Appraisal District conducts business, and the situation constantly changes. The Appraisal District is doing its best to adapt to constant changes.

Staff may work from home using laptops.

**Portions of this Reappraisal Plan may not be conducted due to uncertainties.**