



Complaint ID 0262 1855
Roll No. 30001113821

COMPOSITE ASSESSMENT REVIEW BOARD DECISION
HEARING DATE: SEPTEMBER 9, 2024

PRESIDING OFFICER: J. DAWSON
BOARD MEMBER: R. IRWIN
BOARD MEMBER: C. NEITZ

BETWEEN:

LANCASTER GREEN APARTMENTS LTD.
Represented by CVG Canadian Valuation Group Ltd.

Complainant

-and-

REVENUE & ASSESSMENT SERVICES
For the City of Red Deer

Respondent

This decision pertains to a complaint submitted to the Central Alberta Regional Assessment Review Board in respect of a property assessment prepared by an Assessor of The City of Red Deer as follows:

ROLL NUMBER: 30001113821
MUNICIPAL ADDRESS: 475 LANCASTER DR, RED DEER, AB
ASSESSMENT AMOUNT: \$14,478,300

The complaint was heard by the Central Alberta Regional Assessment Review Board on the 9th day of September 2024, via videoconference.

Appeared on behalf of the Complainant: K. Goertzen, agent for Canadian Valuation Group Ltd.

Appeared on behalf of the Respondent: T. Johnston, Assessment Coordinator for City of Red Deer
A. Minhas, Property Assessor for the City of Red Deer

DECISION: The assessment of the subject property requires No Change.

JURISDICTION

- [1] The Central Alberta Regional Assessment Review Board [“the Board”] has been established in accordance with section 455 of the *Municipal Government Act*, RSA 2000, c M-26 [“MGA”].

PROPERTY DESCRIPTION AND BACKGROUND

- [2] The subject property contains a quality five, 93,308 square foot multi-residential apartment building with a footprint of 23,327 square foot in the southeast of Red Deer. The property is assessed using the income approach to value with 48 one-bedroom suites with assessed monthly rent of \$1,100 per month, and 47 two-bedroom suites with assessed monthly rent of \$1,250 per month. The vacancy rate is assessed at 5.5%. \$51,234.00 is the assessed parking revenue. A Gross Income Multiplier (GIM) of 11.0 was used.

PRELIMINARY MATTERS

- [3] The Presiding Officer confirmed that no Board Member raised any conflicts of interest regarding matters before them.
- [4] Neither party raised any objection to the panel hearing the complaint.
- [5] No additional preliminary or procedural matters were raised by any party. Both parties indicated that they were prepared to proceed with the complaints.

POSITION OF THE PARTIES

Position of the Complainant

- [6] The Complainant presented the subject property with photos, map, and property details.
- [7] The Complainant explained that the Respondent has increased the assessed value by over \$1M per year for the past two years, far outpacing any market activity.
- [8] The Complainant presented a 2019 appraisal of the subject property which indicates a value of \$13,300,000 based on a 5.75% capitalization rate, which worked out to \$140,000 per suite.
- [9] The Complainant argued that the GIM model the Respondent is employing is not producing values reflective of the market. Citing that, while GIM’s can be reliable in times of relative economic certainty and stability, when derived from similar properties to a subject, the past few years have been anything but - as the world (including the Red Deer market) worked to navigate COVID.
- [10] The Complainant asserted that the application of a capitalization rate with market-supported net operating income figures produces a more appropriate market value estimate. The Complainant provided an analysis and explained that these sales show that CAP rates were high during the pandemic, decreased as restrictions eased and life returned to normal, but then rose again as inflation and interest rates rose at the time of the current assessment. Applying market typical rents and vacancy parameters, a reasonable expense ratio and the appropriate CAP rate for the market area at the time of assessment of 5.75% indicates a multi-residential value of \$13,762,500 (rounded).

- [11] The Complainant concluded that using a GIM model makes the assumption of constant risk through one of the most volatile real estate periods in history – by making this assumption and applying GIM’s higher than the average for superior properties, the Respondent is over valuing the subject property – and has increased the assessment an unreasonable amount year-over-year.
- [12] The Complainant argued that using a model that incorporates risk through the application of market expense ratios and appropriate capitalization rates indicates a value for the subject that is much more congruent with actual market activity and expected values based on recent sales of properties in Red Deer. Suggesting that this value more closely aligns with the appraisal done on the subject in 2019 as well.
- [13] The Complainant provided analyses of capitalization rate, operating expense ratio, and provided information on vacancy rates and market rental rates.
- [14] In Rebuttal, the Complainant asserted that the Respondent states that GIM models “*handle the complexities and variances in income and expenses*” they have provided no evidence to substantiate this, while several sources provided in our disclosure indicate that this is untrue and that “*gross income multipliers do not reflect investment risks*”.
- [15] The Complainant requested that the 2024 assessment of the subject property be reduced to \$13,762,500 to best represent market value at the time of assessment.

Position of the Respondent

- [16] The Respondent explained that the Complainant’s evidence raised the issue that the subject property’s assessed value has increased by over \$1 million annually for the past two years, far outpacing any market activity.
- [17] The Respondent presented data showing rental increases, decreased vacancy rates, and additional income streams (e.g. parking income) that have contributed to the subject property’s income potential.
- [18] The Respondent provided equity evidence from comparable properties that have experienced similar trends, showing that the assessment is consistent with similar properties.
- [19] The Respondent stated the Complainant’s argument that the subject property’s assessed value is significantly higher than the value indicated in a 2019 appraisal.
- [20] The Respondent explained that the appraisal is four years old, lacks supporting documentation, and does not provide a comprehensive analysis of the property’s current market conditions. The appraisal is based on a point in time that does not reflect the market dynamics at the current assessment date, making it irrelevant for this hearing.
- [21] The Respondent also argued that the Complainant’s evidence raised the issue of whether direct capitalization is a better methodology to assess the subject property than the GIM methodology. The Respondent indicated that the GIM model is more appropriate for mass appraisal purposes and is consistently applied across all multi-family properties within the City of Red Deer and by other major municipalities.

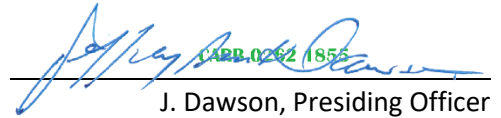
- [22] The Respondent stated that the Complainant raised the issue of whether applying a capitalization rate to market-supported Net Operating Income (NOI) figures would produce a more appropriate value estimate for the subject property.
- [23] The Respondent provided an analysis of sales compared to their assessments finding that the ratio was a median 1.02 and the average was 1.03, well within an acceptable range.
- [24] The Respondent asserted that the GIM model is more appropriate for mass appraisal purposes and is consistently applied to all multi-family properties within the City of Red Deer.
- [25] The Respondent requested that the assessment be confirmed as correct.

BOARD FINDINGS and DECISION

- [26] The Board finds the appraisal of the Complainant is four years old with no adjustment for time, lacks supporting documentation, and does not provide a comprehensive analysis of the property's current market conditions.
- [27] The Board finds the GIM methodology used by the Respondent and the direct capitalization methodology used by the Complainant are both appropriate methodologies to make an estimate of market value. However, proper analysis of the inputs is required.
- [28] The Board finds that the Respondent demonstrated with 17 sales that their use of the GIM methodology is producing assessment to sales ratios well within an acceptable range with a median 1.02 and the average was 1.03.
- [29] The Board finds no assessment to sales ratio evidence from the Complainant to show that the direct capitalization methodology produced a more accurate assessment value.
- [30] The Board finds insufficient evidence of market rental rates or vacancy rates used in the Complainant's income approach to value.
- [31] The Board finds that the GIM methodology utilized by the Respondent is appropriate and produces an accurate assessment value for fair distribution of the tax base.
- [32] The Board finds that an increase in assessment value alone is not evidence of an incorrect assessment value.
- [33] The Board finds insufficient evidence to consider a change in assessment value.

DECISION SUMMARY

- [34] The assessment of the subject property requires No Change.
- [35] Dated at the Central Alberta Regional Assessment Review Board, in the city of Red Deer, in the Province of Alberta this 8th day of October, 2024 and signed by the Presiding Officer on behalf of all the panel members who agree that the content of this document adequately reflects the hearing, deliberations and decision of the Board.


CARB-0262-1855
J. Dawson, Presiding Officer

MGA Section 470(1) Where a decision of an assessment review board is the subject of an application for judicial review, the application must be filed with the Court of King's Bench and served not more than 60 days after the date of the decision.

APPENDIX

Documents presented at the Hearing and considered by the Board.

<u>NO.</u>	<u>ITEM</u>	<u>PAGES</u>
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