

From: Brown, Charles - FS
Sent: Fri, 11 Sep 2020 21:56:19 +0000
To: Maggie Love
Subject: FW: Valle Seco Federal Parcels appraisal comments
Attachments: Review notes - Federal Parcels.pdf

Hi Maggie,

(b)(6) I wanted to point out one more important typo I noticed for you to consider. You indicated the effect dates on the appraisals as August 13, 2020, but I provided you the revised statement of work on August 14.



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From: Brown, Charles - FS
Sent: Thursday, September 3, 2020 10:11 AM
To: 'maggielove@beyondbb.com' <maggielove@beyondbb.com>
Subject: FW: Valle Seco Federal Parcels appraisal comments

Hello Maggie,

In addition to the initial review comments I sent you on Monday, I have one additional item regarding the Federal parcels appraisal. Page 1 of the Statement of Work requests the following:

In addition to a value of the total Federal property, the appraisal should provide unit values (per acre) of the above Federal Parcel 5 (33.00 acres) and Federal Parcel 11 (68.00 acres) as each contributes to the whole 452.06-acre Federal property. The appraisal should also provide a unit value (per acre) for the non-Federal property as a whole, and a unit value (per acre) for the Federal property as a whole, and acreage ranges in which those unit values remain valid for use.

The appraisal did provide a breakdown of the contributory unit rates for each of the parcels, however, the appraisal did not indicate an acreage range for which the unit value of the Federal property as a whole would remain valid for use.

I'll be sending you my initial comments on the non-Federal parcel appraisal shortly.

Thanks!
Chuck



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From: Brown, Charles - FS
Sent: Monday, August 31, 2020 9:08 AM
To: maggielove@beyondbb.com
Subject: Valle Seco Federal Parcels appraisal comments

Good morning Maggie,

Attached please find my initial comments after reading through your appraisal of the Valle Seco Federal Parcels. If you make changes and resubmit the report, please be sure to change the report date (not the effective date). Furthermore, it would also be good to make note in the Scope of Work section that a report was made, comments were received, and the general nature of the changes made in the current report. I will be reading through the non-Federal Parcel appraisal next. Let me know if you have any questions.

Thanks - Chuck



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An inholding is non-Federal owned land surrounded by Federal lands. In several places the report appears to incorrectly identify Parcels 4 and 6 as inholdings. Parcel 4 is adjacent to private lands on three sides. Parcel 6 appears to be surrounded by private lands.

Page 29 should read "Federal Parcels 3 and 5", rather than "Federal Parcels 2 and 5".

Page 42 indicates the Federal land is currently exempt from taxation. In accordance with UASFLA, if the property is not assessed or taxed, the appraiser should collect all necessary information to support an estimate of the assessment and the tax rate to support an estimate of the dollar amount of tax.

Pages 42 and 43 cite potential hazards. Parcels 1, 2, and 5 are identified as located in FEMA Zone A flood hazard areas. Each of the comparable sale descriptions, however, indicate that the sales have no hazards. The report does not appear to reconcile the subjects' flood hazards with the comparable sales. Furthermore, the FEMA Panel and the FEMA Zones identified for Parcels 1 and 3 appear to be incorrect.

Pages 53 and 54 include larger parcel discussions and analyses. The larger parcel determinations for Parcels 2, 3, 8, and 9 cannot include adjacent lands under fundamentally different ownerships without violating the unity of ownership criteria of the larger parcel concept. Furthermore, while analyses were provided to address lack of access issues on several of the parcels, these particular parcels (2, 3, 8, and 9) appear to be valued based on their contributory values to other adjacent lands without also addressing any market value impact by virtue of their limited usability (small sizes). The market may or may not reflect a separate value impact for this factor, but the report appears incomplete without an analysis of this characteristic.

The Larger Parcel discussion of Parcel 5 on page 54 states (b)(5); Deliberative Process Privilege

(b)(5); Deliberative Process Privilege

(b)(5); Deliberative Process Privilege

(b)(5); Deliberative Process Privilege

The description of Parcel 6 on page 55 states that the parcel is "completely surrounded by National Forest", which appears to be incorrect.

Page 56 states (b)(5); Deliberative Process Privilege Please refer to the prior comments (b)(5); Deliberative Process Privilege

Page 59 - Please refer to the prior comments (b)(5); Deliberative Process Privilege

(b)(5); Deliberative Process Privilege

Page 66 indicates that Sale 2 requires upward adjustment for seller duress. However, no evidence is provided to explain whether there was specific seller duress, or whether the seller was simply basing pricing decisions on changed market conditions.

Page 67 - Please refer to the prior comments regarding Larger Parcel in terms of the analyses for Parcels 8 and 9.

Page 95 - Please refer to the prior comments regarding seller duress.