

# Harris Central Appraisal District Reappraisal Plan Tax Years 2025-2026

# Adopted by the Board of Directors

August 21, 2024

#### Resolution No. 2024-06

#### A RESOLUTION OF THE BOARD OF DIRECTORS OF THE HARRIS CENTRAL APPRAISAL DISTRICT APPROVING AND ADOPTING THE 2025-2026 REAPPRAISAL PLAN

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WHEREAS, the Texas Tax Code obligates the Board of Directors of the Harris Central Appraisal District to adopt a written plan for the periodic reappraisal of all properties within the district's boundaries; and

WHEREAS, Texas Tax Code, Section 6.05 expressly requires the Board of Directors to complete all hearings, amendments, and resolutions necessary for the plan's adoption no later than September 15 of each even-numbered year; and

WHEREAS, the Board of Directors believes the adoption of the proposed reappraisal plan as submitted for years 2025-2026 is in the interest of the public;

NOW THEREFORE, BE IT RESOLVED AS FOLLOWS:

The Board of Directors of the Harris Central Appraisal District hereby adopts the 2025-2026 reappraisal plan as submitted to be implemented by the Harris Central Appraisal District.

PASSED, APPROVED, AND ADOPTED this the 21st day of August 2024.

Chairman, Board of Directors Harris Central Appraisal District

ATTEST:

Sevretary, Board of Directors Harris Central Appraisal District



### TABLE OF CONTENTS

Executive Summary 1
Reappraisal Plan
Tax Code Requirement
Appraisal Analysis & Delivery of Notices 4
Performance Analysis
Analysis of Available Resources
Planning and Organization
Mass Appraisal System
Real Property Valuation
Personal Property Valuation
Appraisal Notices
Hearing Process
Identifying & Updating Relevant Property Characteristics
New Construction/Demolition7
Remodeling7
Reinspection of Problematic Market Areas7
Market Area Delineation
Reinspection of the Universe of Properties
Field or Office Verification of Sales Data and Property Characteristics
Legal Attributes Affecting Value
Pilot Study
Valuation Methods by Property Type
Residential Real Property 10
Inventory Residential Property 12
Commercial Real Property12
Land Analysis 16
Industrial Real Property 17
Utility Property 18
Minerals 19
Business and Industrial Tangible Personal Property
The Mass Appraisal Report 22
Value Defense
Appendix: Calendar of Key Events i
Appendix: Market Areasvi

#### **EXECUTIVE SUMMARY**

After recording two consecutive years ('22 & '23) of declining sales volume in excess of 10% and mortgage interest rates at twenty-year highs (>7%) the Harris County housing market is slowing down. For tax year 2024, the housing market experienced reduced sales volume, an almost unchanged average and median sales prices, and a building of the inventory of available property. As we approach 2025 there is considerable uncertainty surrounding the housing market. Specifically, inflation has been persistent which has held interest rates in the >7% with no definitive timeframe for relief. Additionally, although supply-chain issues have been resolved, the elevated cost of almost everything, from labor costs to insurance, to the cost of borrowing, is exacerbating the already difficult issue of housing affordability.

The rising interest rate has also impacted on commercial property. Housing is heavily weighted on the Consumer Price Index (CPI) and the growth in multi-family along with other commercial properties are targeted for price reduction to lower inflation. Higher interest rates have resulted in an increase in capitalization rates for some properties. The increase in the cost of money has reduced the number of transactions. Sellers hold on to their prices while buyers argue for and await better deals. The existing challenge is refinancing matured loans at a higher interest rate for underperforming assets. Office buildings which are marred by high vacancies continue to be the main offender. Multifamily and warehouse are experiencing a pullback from the recent years of drastic price growth. Retail remains positively stable while the buoyance for medical properties continues.

In order for the district's appraisals to accurately reflect the changes in the local real estate market over the next two years, especially due to inflation, an annual reappraisal cycle will best serve to smooth out the unpredictability in market trends. The decision to reappraise each year covered by this plan will allow the district the flexibility to evaluate current market data, implement changing building costs, re-delineate neighborhood and economic boundaries, and calibrate mass appraisal models.

The Texas Property Tax Code (hereafter "Tax Code") Section 6.05(i), which requires the adoption of this plan, uses "reappraisal" in a broad sense to mean the activities that the district undertakes every year – inspecting property, updating models, and appraising the property. Under this section, a property is reappraised when these activities are done, even if its value does not change. Harris Central Appraisal District (HCAD) will reappraise all property in the district. Accordingly, this plan describes HCAD's activities as annual reappraisal, and it will be the district's policy to mail appraisal notices to all property owners every year. The board of directors (BOD) believes this policy is appropriate and in the public interest because it will make property owners fully aware of their property's value even if no change has occurred.

HCAD will appraise properties in Harris County in accordance with the provisions in the Texas Property Tax Code including provisions contained in Section 23.01 (e), as stated below:

(e) If the appraised value of property in a tax year is lowered by the appraisal review board or through litigation, the lowered appraised value of the property is considered to be the appraised value of the property for that tax year. In the next tax year in which the property is appraised, the chief appraiser may not increase the appraised value of the property unless the increase by the chief appraiser is reasonably supported by clear and convincing evidence when all of the reliable and probative evidence in the record is considered as a whole. If the appraised value is finally determined in a protest under Section 41.41(a)(2) or an appeal under Section 42.26, the chief appraiser may satisfy the requirement to reasonably support by clear and convincing evidence an increase in the appraised value of the property in the next tax year in which the property is appraised by presenting evidence showing that the inequality in the appraisal of property has been corrected with regard to the properties that were considered in determining the value of the subject property.

#### **REAPPRAISAL PLAN**

#### TAX CODE REQUIREMENT

Section 6.05(i), Tax Code, requires each appraisal district to adopt a written reappraisal plan every two years. Section 25.18, Tax Code, requires the district to implement the plan. Section 6.05(i) provides:

(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 10<sup>th</sup> 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 hearings, 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.

#### Implementation

Subsections (a) and (b), Section 25.18, Tax Code, provide as follows:

- (f) Each appraisal office shall implement the plan for periodic reappraisal of property approved by the board of directors under Section 6.05 (i).
- (g) 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 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.

### 2025 & 2026 Reappraisal Plan Detail

#### **APPRAISAL ANALYSIS & DELIVERY OF NOTICES**

In each tax year covered by the plan, HCAD will conduct a mass appraisal of all properties in the district and will update property values, as necessary. The chief appraiser will provide a notice of appraisal for each property in compliance with Section 25.19, Tax Code. The district will conduct the mass appraisals in compliance with applicable provisions of the Texas Property Tax Code, Uniform Standards of Professional Practice, relevant standards of the International Association of Assessing Officers, and valuation manuals prescribed by the Texas Comptroller of Public Accounts. The activities involved in the appraisal analysis are described below.

#### **PERFORMANCE ANALYSIS**

For each tax year, the previous year's certified values will be analyzed with ratio studies to determine appraisal accuracy and uniformity overall. The analysis will be stratified by independent school district, market area, and property categories. Ratio studies will be conducted in compliance with the Independent Association of Assessing Officers (IAAO) current *Standard on Ratio Studies*. Descriptive statistics, such as mean, median, and weighted mean ratios will be calculated for properties in each category to measure the level of appraisal accuracy and the coefficient of dispersion (COD) will be calculated to measure appraisal uniformity by property reporting category. This analysis will be used to develop the basis for establishing the accuracy and uniformity of appraisal performance.

#### **ANALYSIS OF AVAILABLE RESOURCES**

In developing its mass appraisal, HCAD must be aware of, understand, and correctly employ those recognized methods and techniques necessary to produce a credible appraisal, avoid errors that significantly affect the appraisal, and render the appraisal in a careful and competent manner. USPAP SR 5-1. Staffing and budgetary requirements for tax year 2025 are detailed in the district's proposed 2025 budget, to be considered by the BOD and attached to the written biennial plan by reference, once approved. This reappraisal plan is adjusted to reflect the proposed available staffing in tax year 2025 and the anticipated staffing for tax year 2026. Staffing will impact the cycle of real property reinspection and personal property on-site review that can be accomplished in the 2025–2026 time period.

Information Technology (IT) support will be detailed with year specific functions identified and system upgrades scheduled. Computer generated forms will be reviewed for revisions based on year and reappraisal status. Legislative changes will be scheduled

for timely completion and testing. Existing maps and data requirements will be specified, and updates put in production as needed.

HCAD will evaluate the potential need for a revised mass appraisal software program and conduct a study concerning possible Multiple Regression Analysis (MRA) integration. Staff will periodically report their progress and recommendations to the board of directors.

#### **PLANNING AND ORGANIZATION**

In developing a mass appraisal, an appraiser must identify the problem to be solved, determine the scope of work necessary to solve the problem, and correctly complete research and analysis necessary to produce and communicate a credible mass appraisal. USPAP SR 5. HCAD must perform these activities in accordance with the deadlines and timetable set out in the Tax Code. For each year, a calendar of key events with critical completion dates will be prepared for each major work area. This calendar identifies all key events for appraisal, information and assistance, clerical and information technology. Production standards for field and office activities will be established and incorporated in the planning and scheduling process. The scope of work, available time frame, staffing resources, and any budgetary constraints have been considered in the development of the reappraisal plan. To the extent that circumstances require revision to this plan, amendments to the plan will be submitted to the BOD for approval.

#### MASS APPRAISAL SYSTEM

The district must employ recognized techniques for specifying and calibrating its mass appraisal models. USPAP SR 5-4. Computer assisted mass appraisal (CAMA) system revisions and enhancements will be specified and prioritized with IT. Legislative mandates will be addressed and implemented into the necessary system applications. All computer-generated forms, letters, notices, and orders will be reviewed annually and revised as required. The following details the procedures as they relate to the 2025 and 2026 tax years.

#### REAL PROPERTY VALUATION

Revisions to cost models, income models, and market models will be specified, updated, and tested each tax year. These cost schedules will be tested with market data to ensure that the appraisal district follows Section 23.011, Tax Code. Replacement cost new (RCN) tables and depreciation tables will be tested for accuracy and uniformity through ratio studies and comparison with cost data from *Marshall & Swift Services*, a nationally recognized cost service.

Income, expense, and occupancy data will be updated in the income models for each market area and property type. Capitalization rate studies will be completed using current sales data. The resulting models will be tested using ratio studies.

Land tables will be updated using current market data and then tested with ratio studies. Restrictions, covenants, and other factors influencing value will be identified and analyzed.

#### PERSONAL PROPERTY VALUATION

In appraising personal property, USPAP SR 5-3 requires the district to identify and analyze the effects on use and value of industry trends, value-in-use, and trade level of personal property. Where applicable, analyze the current use and alternative uses to encompass what is profitable, legal, and physically possible, as relevant to the type and definition of value and intended use of the appraisal. Personal property has several measurable marketplaces; therefore, the appraiser must define and analyze the appropriate market consistent with the type and definition of value. Personal property analyst staff will test density schedules based on rendition and prior year hearing documentation. Models will be refined according to actual original cost data and valuation procedures will be reviewed, modified as needed, and tested.

#### APPRAISAL NOTICES

Appraisal notices will be reviewed for legal sufficiency and correctness. Enclosures will be updated, including the latest version of the Comptroller's *Property Taxpayer Remedies*. Real property notices will generally be mailed in March. Personal property notices will be mailed in June. SB 2, 86th legislature, 2019, effective in 2020, separated some information from the appraisal notice into a separate notice that the district will deliver later in the year. The district transferred tax estimate information from the appraisal notice.

#### HEARING PROCESS

Appraisal will conduct training of staff in April of each tax year to ensure preparedness for informal meetings, which begin the last week of April, and formal hearings, which generally begin the middle of May of each tax year. Revisions and enhancements to existing hearing scheduling procedures will be reviewed and updated to ensure efficiency and timely certification of the appraisal roll. Standards of documentation and the appraisal district hearing evidence will be reviewed and updated to reflect the current valuation methods and practices. Documentation will comply with generally accepted appraisal practices and techniques. Production of documentation will be tested and compliance with Tax Code requirements will be ensured.

#### **IDENTIFYING & UPDATING RELEVANT PROPERTY CHARACTERISTICS**

USPAP SR 5-5 requires appraisers engaged in mass appraisal to take reasonable steps to ensure that the quantity and quality of the factual data that are collected are sufficient to produce credible mass appraisals. For example, in real property, where applicable and feasible, systems for routinely collecting and maintaining ownership, geographic, sales,

income and expense, cost, and property characteristics data must be established. Geographic data must be contained in as complete a set of cadastral maps as possible, compiled according to current standards of detail and accuracy. Sales data must be collected, confirmed, screened, adjusted, and filed according to current standards of practice. The sales file must contain, for each sale, property characteristics data that are contemporaneous with the date of sale. Property characteristics data must be appropriate and relevant to the mass appraisal models being used. The property characteristics data file must contain data contemporaneous with the date of appraisal including historical data on sales, where appropriate and available. The data collection program must incorporate a quality control program, including checks and audits of the data. USPAP SR5-5, comment.

Field and office procedures will be reviewed and revised as required for data collection and verification of value-related and descriptive property characteristics for each property. Activities scheduled for each tax year include inspection of new construction, demolition and remodeling; reinspection of problematic market areas; reinspection of the universe of properties on a projected three-year cycle; and annual verification of sales information. Methods of reinspection include on-site inspection and use of orthographic and oblique imagery.

#### NEW CONSTRUCTION/DEMOLITION

Field and office review procedures for inspection of new construction will be reviewed and revised as required. Field production standards will be established and quality assurance will be conducted to verify accuracy of data. Building permits will be received from the cities and Harris County electronically and in paper form. CAMA system uploads and data entry will both be used to input the data into the permits database. The process of verifying demolition of improvements will be specified.

#### REMODELING

Market areas with notable remodeling of improvements will be identified and on-site inspections will be scheduled to verify the degree of remodeling and property characteristic data. Varying levels of remodeling frequently exist in transition areas creating submarkets within a neighborhood, which will be analyzed through stratification of sales by degree of remodel.

#### REINSPECTION OF PROBLEMATIC MARKET AREAS

Real property market areas, stratified by property classification, will be tested for low or high protest volumes, low or high sales ratios, and high coefficients of dispersion. Particular attention will be given to the lowest value strata where the sales samples are usually small and the coefficients of dispersion are traditionally higher, which makes the accuracy of the data especially important. Market areas that fail any or all these tests will be determined to be problematic. Field reviews will be scheduled to verify and correct property characteristics data. Additional sales data will be researched and verified to assess whether the market area is correctly delineated. In the absence of adequate market data, neighborhood boundary lines may need to be redrawn, and neighborhood clusters representative of the overall market area will be established.

#### MARKET AREA DELINEATION

In conducting the mass appraisal, the district must identify, from sources the appraiser reasonably believes to be reliable, the characteristics of the properties that are relevant to the type and definition of value and intended use, including:

(i) the group with which a property is identified according to similar market influence; (ii) the appropriate market area and time frame relative to the property being valued; and (iii) their location and physical, legal, and economic characteristics. The appraiser must identify the characteristics of the market that are relevant, and in appraising property, must identify the appropriate market area for the property. USPAP SR 5-2.

Market areas are defined by the physical, economic, governmental, and social forces that influence property values. The effects of these forces were used to identify, classify, and stratify or delineate similarly situated properties into smaller, more comparable, and manageable subsets for valuation purposes. Delineation can involve the physical drawing of neighborhood boundary lines on a map; it can also involve statistical separation or stratification based on attribute analysis. These homogeneous properties have been delineated into valuation neighborhoods for residential property or economic class for commercial property, but because there are discernible patterns of growth that characterize a neighborhood or market segment, analyst staff will annually evaluate the neighborhood boundaries or market segments to ensure homogeneity of property characteristics. Residential and commercial market areas are listed in the Addendum.

#### REINSPECTION OF THE UNIVERSE OF PROPERTIES

As noted above, USPAP requires the district to ensure that the quantity and quality of data that it collects are sufficient to result in credible appraisals. USPAP SR 5-2. Real property reinspection for the 2025 and 2026 tax years will be completed using a combination of field inspections and office review in compliance with the IAAO *Standard on Mass Appraisal of Real Property*. In compliance with Section 3.3.4, each property should be reinspected at least every 4 to 6 years. Office review of property will include; 1) the examination of aerial photography using oblique and orthographic imagery, which allows for digital verification of building measurements and visual inspection of external economic influences; 2) the review of street-view digitized images.

A sketch verification project will be used as part of an on-site review in each tax year of the reappraisal plan. Geographic Information Systems (GIS) building roof lines will be used to calculate square footage and perimeter of the area to compare against existing CAMA square footage.

#### FIELD OR OFFICE VERIFICATION OF SALES DATA AND PROPERTY CHARACTERISTICS

Specific data about the date, price, terms, and conditions of a sale must be verified for proper analysis and use in a ratio study. Information on property characteristics that reflect the property at the time of sale must be captured to determine whether the property that was appraised is essentially the same as what was sold. This is particularly necessary when the property was involved in foreclosure proceedings. Frequently, foreclosed property has been abandoned or neglected leaving the property in a less than desirable condition. Sales and property characteristics data must be accurate, or ratio study results will be distorted.

#### LEGAL ATTRIBUTES AFFECTING VALUE

In conducting the mass appraisal, the district must identify known easements, restrictions, encumbrances, leases, reservations, covenants, contracts, declarations, special assessments, ordinances, or other items of similar nature that affect the value of the property. USPAP SR 5-2. The district will maintain an active program to identify and describe elements of recorded conveyances that will affect the use or value of the property, such as easements, covenants, reservations, and declarations. The district will also monitor the enactment or changes of governmental restrictions affecting property value, such as zoning, health ordinances, special assessments, and other legal restrictions. Where leases and other possessory interests are of a nature and duration that they affect the taxability of property or determination of a property's appraised value under the Tax Code, they will be considered in the individual valuation of the property to which they apply.

#### **PILOT STUDY**

As noted above, the district must be aware of, understand, and correctly employ recognized methods and techniques necessary to produce a credible mass appraisal. USPAP SR 5-1. The district will review mass appraisal literature, updates to the Appraisal of Real Estate and the Uniform Standards, and other relevant sources to identify potential changes in methodology or models. Where the Tax Code or comptroller rules or manuals prescribe particular methods and procedures, the district will ensure that compliance with those prescriptions is incorporated in its procedures. New or revised mass appraisal models will be tested on randomly selected market areas. Sales ratio studies will be used to test the models. Predictive results will be refined and retested. The procedures used for model specification and model calibration will comply with current *USPAP* Standards, for the applicable year.

#### VALUATION METHODS BY PROPERTY TYPE

For each tax year, valuation models will be specified and calibrated in compliance with the technical standards from IAAO and *USPAP*. The calculated values will be tested for

accuracy and uniformity using ratio studies. Performance standards will be those as established by the IAAO current *Standard on Ratio Studies*. Property values in all market areas will be analyzed and updated each reappraisal year as required for appraisal level and uniformity.

#### RESIDENTIAL REAL PROPERTY

Ratio studies will be conducted on approximately 6,900 residential valuation neighborhoods. In order to produce more consistent values and strong sales samples, the valuation group will review the residential neighborhoods and where appropriate, work to consolidate neighborhoods that are in proximity to one another, contain similar residential properties, and experience similar market conditions. Sales ratios are used to judge the two primary aspects of mass appraisal accuracy: level and uniformity of value (*Fundamentals of Mass Appraisal*, IAAO, 2011). The reappraisal process for residential property, which includes land analysis, sales outlier review, neighborhood sales analysis, and finalization of proposed estimates of value, typically occurs mid-September through February.

#### Valuation Methods Used:

#### Cost Approach

The district will use a market trended cost approach when valuing single-family and multi-family residential properties. The comparative unit method will be used to develop the "base" cost of a structure. Adjustments will then be made for differences from base specifications using the unit-in-place method. Table-driven cost factors, taken from *Marshall & Swift*, a nationally recognized cost estimator, will be adjusted for local or regional differences in construction and labor costs. Neighborhood or location adjustment factors will be developed from appraisal statistics provided by ratio studies to ensure that estimated values reflect both the supply and demand side of the market. The following equation denotes the market trended cost model used:

MV = MA [RCN - D] + LV

The market value (MV) equals the market adjustment factor (MA) multiplied by the replacement cost new (RCN) less depreciation (D), plus the land value (LV). As the cost approach separately estimates both land and building values and uses depreciated replacement costs, which reflect only the supply side of the market, it is expected that adjustments to the cost values are needed to bring the level of appraisal to an acceptable standard. Market or location adjustments are applied uniformly within neighborhoods to account for location variances between market areas or across a jurisdiction.

Residential land values will be estimated using the base lot method, which establishes the value of the standard, or "base" parcel within each stratum or delineated neighborhood through sales comparison analysis. The analysis assumes that the major factors causing variations among land values within a neighborhood are view, traffic, and size. In areas where insufficient vacant land sales exist, the abstraction method, also known as the land

residual method, and the allocation method, known as the land ratio method, will be used to establish base lot values within a neighborhood. The analysts will develop a base lot and primary rate and assign each unique neighborhood to one of six square foot land tables. The square foot land table is designed to systematically value the primary and residual land based on a specified percentage of the primary rate. A computerized land table stores the land information required to consistently value individual parcels within neighborhoods. Land adjustments will be applied on individual properties, where necessary, to adjust for such influences as view, shape, size, and topography, among others.

If a neighborhood is to be updated, the analyst will run a ratio study that compares recent time adjusted sale prices in a neighborhood with the properties' current cost values trended by the previous year's market adjustment factor. The weighted mean of these ratios indicates the neighborhood's level of value. This weighted mean ratio will be compared to the target appraisal-to-sale ratio to determine a new market adjustment factor that will trend the values closer to the market value evidenced by recent sale prices. The sales used reflect the market influences and conditions only for the specified neighborhood, thus producing more representative and supportable values. A market adjustment factor is calculated and applied uniformly by state class to residential properties within a neighborhood. Once the market-trend factors are applied, a second run of the ratio study is generated that compares recent sale prices with the proposed market values for these sold properties. From this set of ratio studies, the analyst will judge the appraisal level and uniformity in both update and non-update neighborhoods.

An extensive review of the residential cost schedule is performed by selecting a sample of newly constructed sold properties of varying construction quality in Harris County. The property characteristics of these properties are verified and HCAD dwelling costs are compared against the most current *Marshall & Swift Residential Estimator* costs. This process includes correlation of quality of construction factors from HCAD and *Marshall & Swift*. The results of this comparison are analyzed using several measures, including stratification by quality and review of estimated building costs, as well as land value to sale prices.

A sub-sample of the 2024 review properties were compared to updated *Marshall & Swift Residential Estimator* costs and building cost indices for 2024. The comparison of the *Marshall and Swift* cost index is used as a check to determine whether residential costs have changed more than 10 percent since the last cost update. For 2024 and 2026 HCAD will continue to compare this sub-sample against the most up-to-date *Marshall & Swift Residential Estimator* costs. At a later date or if construction costs change drastically HCAD will perform an extensive cost review to establish a new base comparison.

The residential depreciation schedule was also reviewed for 2024. The depreciation schedule was found to be in agreement with market derived depreciation. The depreciation analysis will again be performed for 2025 and 2026.

Sales Comparison Approach

As indicated in *Property Appraisal and Assessment Administration* (IAAO, 1990), in the absence of a sale of the subject, sales prices of comparable properties are usually considered the best evidence of market value. The sales comparison approach models the behavior of the market by comparing the properties being appraised with comparable properties that have recently sold or for which offers to purchase have been made. Their sales prices are then adjusted for differences from the subject and a market value for the subject is estimated from the adjusted sales prices of comparable properties.

#### Income Approach

The income approach is most suitable for types of properties frequently purchased and held for the purpose of producing income, such as apartments, office buildings, retail, and warehouses. The district typically uses this approach on single-family condominium complexes that are being operated as apartments and individual unit sales information is not available. The schedules and models used for single-family condominium income valuation are the same used for apartments and are summarized in the *Commercial Valuation Manual*.

#### INVENTORY RESIDENTIAL PROPERTY

Residential improved and vacant property held as inventory is appraised in compliance with Section 23.12 (a), Tax Code.

In general, the district uses its own land value estimates and the actual itemized construction, labor, and material costs, plus other soft or indirect costs to estimate market value as of the assessment date. The market values of improved inventory will be reviewed annually, and inventory consideration will be eliminated when ownership transfers to the end user.

Vacant residential inventory will be valued using a discounted cash flow formula that considers value relative to the income or cash flow, the interest or discount rate, and the number of years the property is likely to be held. As with improved inventory, full market value will be applied once the vacant land is absorbed and ownership transfers for the purpose of residential construction.

#### COMMERCIAL REAL PROPERTY

Ratio studies will be conducted on 70 market areas to measure the two primary aspects of mass appraisal accuracy: level and uniformity of value. Market areas are used to develop a statistical measuring base for pooling and analyzing sales data. The physical boundaries of these areas are reviewed annually to identify any areas requiring modification to reflect the changing patterns in the marketplace. The reappraisal process for commercial property, which includes land analysis, sales outlier review, neighborhood sub-delineation, and finalization of proposed estimates of value, typically occurs mid-September through February. Once proposed values are finalized, a ratio study will be performed again to test the level and uniformity of appraisal within property use and among various classes. Apartments with over twenty units will be valued using

the income approach. Apartments, retail, warehouses, office buildings, medical office buildings, and golf courses will be valued by the cost approach or the income approach, as deemed most appropriate pursuant to Section 23.0101, Tax Code.

#### Valuation Methods Used:

#### Cost Approach

The cost approach to value will be applied using the comparative unit method. This methodology involves the use of national cost data reporting services as well as actual cost information on comparable properties whenever possible. Cost models are typically developed based on *Marshall & Swift*. Cost models include the use of RCN of all improvements. The replacement cost will be used because it values the cost of a property that is a utility equivalent of the property being appraised using current construction methods and materials. This method is an alternative to using the reproduction cost, which is the cost to construct an exact replica of the property being appraised. These costs include comparative base rates, per unit adjustments, and lump sum adjustments. This approach also employs an alternative valuation method for the underlying land. Time and location modifiers will be necessary to adjust cost data to reflect conditions in a specific market and changes in costs over a period of time.

A national cost service is used as a guideline for the cost models and local modifiers will be applied to adjust the base costs specifically for Harris County. Depreciation schedules will be developed based on what is typical for each property type of a specific age. Depreciation schedules have been implemented for what is typical of each major class of commercial property by economic life categories. Schedules have been developed for improvements with a 15 to 60 year expected economic life at five-year intervals. These schedules will be tested every other year to ensure they will be reflective of current market conditions. The actual and effective ages of improvements will be noted in the CAMA software. Effective age estimates will be based on the utility of the improvements relative to the improvement's total economic life and its competitive position in the marketplace. Effective age estimates will be based on three levels of renovation and will be described in the *Commercial Lister's Manual*.

Market adjustment factors such as physical, functional and economic obsolescence will be applied, if warranted. A depreciation calculation override will be applied if the condition or effective age of a property varies from the norm. This override is indicated by appropriately noting the physical condition, functional utility, and economic ratings on the property data characteristics. These adjustments will typically be applied to a specific property type or location and will be developed through ratio studies or other market analyses. Accuracy in the development of the cost schedules, condition ratings, and depreciation schedules usually minimize the necessity of this type of adjustment factor.

#### Sales Comparison 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 as a primary method for estimating land value, but also in comparing sales of similarly improved properties to each parcel on the appraisal roll. Pertinent data from actual sales of properties, both vacant and improved, will be obtained throughout the year in order to analyze relevant information, which is then 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 will also be used in ratio studies, which afford the analyst an excellent means of judging the present level and uniformity of the appraised values. It is anticipated that estimates of value developed using the sales comparison approach will be done concurrently with values generated through the income or cost approaches to value in the two years covered by this plan. The decision as to what primary valuation method would be applied in a given tax year will be determined by reconciliation of the three approaches to value.

Based on the market data analysis and review discussed in the cost, income, and sales approaches, the cost and income models will be calibrated annually. The calibration results will be keyed to the schedules and models in the CAMA system for utilization on all commercial properties in the district. The schedules and models will be summarized in the *Commercial Valuation Manual*. This manual will be provided to appraisers and made available to the public in an easy-to-understand format.

#### Income Approach

The income approach to value will be applied to those real properties that are typically viewed by market participants as "income producing", which are bought and sold based on the property's ability to produce income, and for which the income methodology is considered the most appropriate indicator. The first step in the income approach pertains to the estimation of market rent. This is derived primarily from actual rent data furnished by property owners and from local market study publications. 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 and on local market publications. This allowance accounts for periodic fluctuations in occupancy, both above and below an estimated stabilized level. The market derived stabilized vacancy and collection loss allowance is subtracted from the potential gross rent estimate to yield an effective gross rent. A secondary income or service income is calculated as a percentage of stabilized effective gross rent. Secondary income represents parking income, and other miscellaneous income generated by the operations of real property. The secondary income estimate is derived from actual data collected and available market information. In addition to the secondary income, subjects valued on a net basis including office buildings, medical office buildings, retail, and warehouse properties, have a pass through income added to account for recoveries directly associated with the variable expenses and property taxes. This income is referred to as common area maintenance (CAM). The secondary income and the pass through estimates are added to the effective gross rent to arrive at an effective gross income.

Allowable expenses and expense ratio estimates will be based on a study of the local market, with the assumption of "prudent management". An allowance for nonrecoverable expenses such as leasing costs and tenant improvements will be included in the expenses. A non-recoverable expense represents costs that the owner pays to lease rental space. Different expense ratios will be developed for different types of commercial property based on use. For instance, retail, class A office buildings, class A and B medical office buildings, and warehouses are most frequently leased on a triple-net basis, whereby the tenant is responsible for their pro-rata share of taxes, insurance, and common area maintenance. In comparison, class B, C, and D office buildings are most often leased on a base year expense stop. This lease type stipulates that the owner is responsible for all expenses incurred during the first year of the lease. However, any amount in excess of the total per unit expenditure in the first year is the responsibility of the tenant. Under this scenario, the total operating expense in year one establishes the base rate. Any increase in expense over the base rate throughout the remainder of the lease term would be the responsibility of the tenant. As a result, expense ratios will be implemented based on the type of commercial property.

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 large lump sums. 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. Subtracting the allowable expenses (inclusive of non-recoverable expenses and replacement reserves) from the effective gross income yields an estimate of net operating income.

Rates and multipliers will be used to convert income into an estimate of market value. These include income multipliers, overall capitalization rates, and discount rates. Each of these is used in specific applications. Rates and multipliers also vary between property types, as well as by location, quality, condition, design, age, and other factors. Therefore, the application of the various rates and multipliers must be based on a thorough analysis of the market. These procedures are documented in the recently updated *Commercial Valuation Manual*.

Capitalization analysis will be used in the income approach models. This methodology involves the capitalization of net operating income as an indication of market value for a specific property. Capitalization rates, both overall (going-in) cap rates for the direct capitalization method and terminal cap rates for discounted cash flow analyses will be derived from the market. Sales of improved properties from which actual income and expense data are obtained provide a very good indication of what a specific market participant requires from an investment at a specific point in time. Additionally, overall capitalization rates can be derived from the built-up method, band-of-investment, debt coverage ratio, and published sources for similar properties, as well as results from verified sales. The capitalization rates relate to satisfying the market return requirements of both the debt and equity positions of a real estate investment. This information is obtained from real estate and financial publications, as well as cap rate studies conducted by the district using verified sales and income information for that specific property.

Rent loss concessions will be made on specific properties with known vacancy problems. A rent loss concession accounts for the impact of lost rental income while the building is moving toward stabilized occupancy. The rent loss will be calculated by multiplying the rental rate by the percent difference of the property's stabilized occupancy and its actual occupancy. Build-out allowances for first generation space or retrofit second generation space and leasing expenses will be added to the rent loss estimate. A leasing expense necessary to bring the property to a stabilized level is also included in this adjustment. The total adjusted loss from these real property operations will be discounted using an acceptable risk rate. The discounted value, inclusive of rent loss due to extraordinary vacancy, build out allowances, and leasing commissions, becomes the rent loss concession and will be deducted from the value estimate of the property at stabilized occupancy. A variation of this technique allows that for every year that the property's actual occupancy is less than stabilized occupancy a rent loss deduction may be estimated.

#### LAND ANALYSIS

As defined in Section 23.01, Tax Code, the market value of property shall be determined by the application of generally accepted appraisal methods and techniques. The market value is the most probable sale price of a property if exposed to the open market for a reasonable length of time without either party acting under duress. The economic principle most applicable to land valuation is highest and best use. The concept of highest and best use implies that the market value of a property depends on future potential use rather than current use. Additionally, other economic principles critical in land valuation include supply and demand, surplus productivity, change, and anticipation. Value estimates for land will be primarily established by way of the sales comparison approach. The sales comparison approach is the preferred and most reliable method when sufficient sales data is available. However, in areas in which sufficient sales data does not exist, the abstraction method, allocation method, and cost of development method will be utilized.

The first step in land valuation will be to conduct a market analysis. The market analysis will be comprised of three steps: stratification, determination of units of comparison, and data analysis. Stratification involves sorting of the sales and other market data into homogenous groups. Within each stratum, land will then be analyzed and valued according to common units of comparison. Once sales are stratified and prices are expressed per common unit of comparison, patterns and trends in land values will be determined. Then, the base rate for tabled land is set for each neighborhood section, a group of accounts in the neighborhood that carry the same base rate. These sections are adjusted to address valuation factors. Factors that affect commercial land value include access, visibility, proximity to a variety of transportation modes, freestanding and business park locations, size, and shape of sites. Additionally, cadastral maps showing the boundaries and other relevant features of all parcels will be used. The analysts use GIS to store maps as databases and help ensure accuracy in land valuation. The county is delineated into 70 market areas and an analyst's responsibilities will be assigned using

these boundaries. Once values are established for the market area and neighborhoods, land adjustments will be applied to individual parcels as necessary to adjust for influences in shape, size, topography, and other influences.

Concluding the assignment of valuing land, the analysts perform ratio studies that compare sales prices of properties to current assessed values. The weighted mean of these ratios indicate the current level of assessment and helps an analyst to determine if the new values are accurate. In addition, analysis to review horizontal equity is performed.

#### INDUSTRIAL REAL PROPERTY

Industrial properties will be valued utilizing mass appraisal models developed in accordance with Sections 23.01, 23.0101, 23.011, 23.012, and 23.013, Tax Code. The reappraisal process based on generally accepted appraisal methods and techniques will include land analysis, sales outlier review, neighborhood sub-delineation, and finalization of proposed estimates of value typically occurs mid-September through February. Once the proposed values are finalized, a ratio study will be performed again to test the level and uniformity of appraisal within property use and among various classes. Sec. 23.0101, Tax Code, states that "In determining the market value of property, the chief appraiser shall consider the cost, income, and market data comparison methods of appraisal and use the most appropriate method".

Industrial real property will be valued each tax year by district staff or by appraisal firms contracted to provide valuation assistance for major industrial complexes and general industrial property. A sample of contractor-valued accounts will be randomly selected from each contractor for review. The contractors will provide documentation to illustrate how current *USPAP* and other generally accepted Standards were followed during the valuation process on these accounts.

The chief appraiser will request, and pursue as necessary, information required to properly specify and calibrate cost, income, and market data comparison models and to use the most appropriate procedures.

#### Valuation Methods Used:

#### Cost Approach

If the cost approach is used, it is done in accordance with Section 23.011, Tax Code and applicable generally accepted appraisal methods and techniques. Cost models may be specified and calibrated differently depending on the type of industrial property to which they apply. Cost and depreciation factors for a refinery, for example, differ from those applicable to a manufacturing facility.

Values will be appropriately adjusted for age and condition and, if warranted, additional adjustment will be made for facility utilization. For example, two facilities making the

same or similar products will not necessarily be similarly valued as one facility may have better efficiencies which make that facility worth more in the market.

Cost schedules will be tested with market data to ensure that the appraisal district follows Section 23.011, Tax Code. RCN and depreciation tables will be tested for accuracy and uniformity using ratio studies compared with cost data from *Marshall & Swift*.

#### Sales Comparison Approach

If the market data comparison method or sales comparison approach is used, it is done in accordance with Section 23.013, Tax Code and applicable generally accepted appraisal methods and techniques applicable to the property involved.

Industrial real property does not have a history of being bought and sold with any regularity in the open market. In fact, most industrial facilities remain just as they are for many years, or decades, without a change in ownership. The few sales of industrial facilities that do occur are not typically used because the sales are usually part of a merger or acquisition, and other assets and intangible considerations are part of the sales price and are not typically disclosed. The use of the sales comparison approach for industrial real property appraisal is typically difficult due to an insufficient number of verifiable sales of stand-alone properties available to have a representative sample of properties.

#### Income Approach

If the income approach is used, it is done in accordance with Section 23.012, Tax Code and applicable generally accepted appraisal methods and techniques.

Use of the income approach for industrial real property appraisal requires particular focus on the individual characteristics of, and affecting, that particular property. Industrial facilities are typically valued using the income approach to value when reliable income information is made available by the property owner.

#### UTILITY PROPERTY

HCAD contracts with an engineering appraisal firm to provide estimates of value for real and personal property utilities. Unitary valuation methods are generally used to value utility property. This is the same method employed by the Comptroller when conducting the Property Value Study. These values will be provided to the district by late May of each tax year. The market area for utility properties can be statewide or regional.

#### Valuation Methods Used:

#### Income Approach

The income approach is heavily considered in unitary valuation, which values the unit as a whole and the result is apportioned to the pieces of the whole. The worth of this income stream can be compared to other investment opportunities to select the proper capitalization rate to apply to the income stream to estimate the value of the system. The worth of a utility is the income stream the system will generate compared to alternative investments that may have less risk in the market. The capitalization rate that is used to estimate the value of the income stream from the utility will always include a risk component. Physical, functional, and economic depreciation will be applied to the valuation and any additional consideration for economic issues will be applied. Economic factors will usually be reflected in the risk portion of the capitalization rate.

#### Cost Approach

The cost approach is typically given more weight when the assets are newer. However, the cost to build a utility facility is very high in today's market and there is not enough available land in proximity to population density to attract construction. Few new utilities have been built in recent years that are of sufficient magnitude to serve a large population, therefore, sufficient cost data is not available to use for valuation comparison purposes.

#### Sales Comparison Approach

The sales comparison approach is typically not an appropriate method of valuation for this property type. Utility properties, such as electric generation, electric transmission, telephone, and cable systems will rarely be sold in the open market on a stand-alone basis. When a utility sells, it sells as an entire company, not piecemeal assets.

#### MINERALS

HCAD contracts with an engineering appraisal firm to provide estimates of value for mineral properties such as oil, gas, and salt reserves. These values will be provided to the district by mid-May of each tax year. The market area for mineral accounts is usually regional.

#### Valuation Methods Used:

#### Income Approach to Value

The appraisal district contracts with an engineering appraisal firm for mineral appraisals. The income approach as outlined in Section 23.175(a), Tax Code is typically used to value mineral interests. This entails estimating the remaining future reserves of the property and the timing of how those reserves will be recovered. This estimation of future production along with the estimation of future pricing will generate an estimated yearly income that is discounted to current day dollars. Each succeeding year's income will be more heavily discounted than the previous, thus rendering less and less value contribution with each succeeding year. For example, using a discount of 20 percent, a dollar (\$1.00) anticipated to be received in the 10th year of the productive life of an oil or gas lease would only contribute \$0.18 (18 cents) of value in today's dollars, whereas a dollar anticipated to be received in the first year would contribute \$0.91 (91 cents) in today's dollars. Each year's value contribution will be added, and then a market adjustment

factor will be applied. The estimated value will be determined from this total, based on the type of interest owned and the decimal interest owned in the lease.

#### BUSINESS AND INDUSTRIAL TANGIBLE PERSONAL PROPERTY

These property types will be valued each tax year by district appraisal staff and contract appraisal firms. After the contractor submits values, a sample of accounts will be randomly selected from each contractor to review. These accounts will be sent to the contractors requesting documentation to illustrate how generally accepted methods and procedures as described in the current *USPAP* Standards were followed during the valuation process. Estimates of value developed by the appraisal firms will be provided to HCAD by late May of each tax year. The notices of appraised value for business and industrial personal property will be mailed in mid-June.

#### Valuation Methods Used:

#### Cost Approach

Although the cost, income, and market data comparison methods of appraisal are all considered, the cost approach is typically determined to be the most appropriate method to value business and industrial personal property. Properties valued using this method is done in accordance with Section 23.011, Tax Code.

Cost schedules will be developed based on Standard Industrial Classification (SIC) codes. These schedules will be reviewed to conform to changing market conditions, if necessary.

Valuation models will be created and refined using actual original cost data to derive the RCN per square foot (or applicable unit) for a specific category of assets. The SIC codes will be prioritized and data will be compiled for review. Individual accounts will be selected for field inspection. Models will be built, adjusted, and tested against the prior year's data. The typical RCN per applicable unit is determined by a statistical analysis of the available data.

The valuation models will be used to develop estimates of value for new accounts where no rendition has been filed. The models also establish parameters for testing the valuation of property for which prior years' data exist or for which current year rendered information is available. If the value tested falls within an acceptable tolerance range of the model value, the account passes that check and moves to the next valuation step. If the account fails, it is flagged for individual review. These tolerances may be adjusted for the current year depending on the analysis of the results from the prior year. This approach uses RCN, which is developed from property owner reported historical cost or from existing valuation models. The trending factors used to develop RCN will be based on the national average for equipment as published in a monthly report of the *Marshall Valuation Service* by Marshall & Swift, L. P., from the fourth quarter (typically October) of the prior year. The RCN is calculated as follows:

#### RCN = HISTORICAL COST X INDEX FACTOR

The percent good depreciation factors will be based on the depreciation schedules for furniture, fixtures and equipment as published in the *Marshall Valuation Service*. This mass appraisal percent good depreciation schedule is used to ensure that estimated values are uniform and consistent within the market. RCN and percent good depreciation factors will be utilized to develop value estimates using the following formula:

#### MARKET VALUE ESTIMATE = $RCN \times Percent \text{ Good Factor}$

Leased and multi-location assets may be valued using original costs and the index factors and percent good depreciation schedules mentioned above.

#### Sales Comparison Approach

Business personal property is typically sold as part of the business as a whole and not by itself, which makes the sales comparison approach unsuitable for valuing most personal property. This approach is only suitable for the valuation of certain types of vehicles and heavy equipment. Value estimates for vehicles will be provided by an outside vendor and are based on data furnished by National Market Reports. An appraiser will appraise these types of properties using published market guides such as JD Power Used Car Guide, Aircraft Blue Book, or Hunter McLean market guides.

There are not sufficient sales of industrial personal property to have a meaningful population of sales for value comparison purposes. This category of personal property is inclusive of all types at a facility, such as furniture, computers, or machinery. It is typical for personal property to be included in the sale of a facility instead of being sold separately. There may be subsets of personal property that are sold, but that does not provide the sales of all personal property necessary to make value comparisons under the sales approach.

The dealer inventory valuation computation is specifically described in Section 23.121(b) of the Texas Property Tax Code. The market value of a dealer's motor vehicle inventory on January 1 is the total annual sales from the dealer's motor vehicle inventory, less sales to dealers, fleet transactions, and subsequent sales, for the 12-month period corresponding to the prior tax year, divided by 12. Section 23.121(f) requires dealers to file a declaration of annual sales with the chief appraiser.

#### Income Approach

The income approach has limited use in the appraisal of machinery, equipment, furniture, fixtures, and leasehold improvements because of the difficulty in estimating future net benefits; except in the case of certain kinds of leased equipment. When reliable data on equipment leases is available, the income approach may be used to estimate fair market value of the equipment.

#### THE MASS APPRAISAL REPORT

Each tax year, the mass appraisal report is prepared and certified by the chief appraiser at the conclusion of the appraisal phase of the ad valorem tax calendar (on or about May 15th). The mass appraisal report is completed in compliance with current *USPAP* Standards. The signed certification by the chief appraiser is compliant with current *USPAP* Standards.

#### VALUE DEFENSE

Evidence to be used by the appraisal district to meet its burden of proof for market value and equity in informal meetings and formal ARB hearings will be developed and provided to the property owner or agent in compliance with Sections 41.461 and 41.67(d), Tax Code. Evidence will be generated and available in the Information & Assistance Division on the 3<sup>rd</sup> floor or on the district's website through their owner's website at owners.hcad.org.

# APPENDIX: CALENDAR OF KEY EVENTS

RESIDENTIAL

Residential	Sep.	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Land Analysis	1							1				0
Neighborhood Delineation												
Sales Validation												
Reinspection												
Sales Ratio Analysis/Valuation:					<u>.</u>					-		
Model Specification												
Model Calibration												
Final Value Review												
New Construction/Discovery												
New Construction Value Review												
New Subdivisions												
Split-outs/Combinations												
Jurisdiction Estimates												
Prior Year Correction Hearings												
Prior Year Corrections												
Field Checks												
Current Year Hearings												
New Staff Training												

COMMERCIAL

	Sep.	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Land Analysis												
Reinspection												
Key Income & Expense Data												
Valuation:												
Land												
Income												
Cost												
Sales Analysis												
Permit Research												
New Construction/Discovery												
New Construction Value Review												
New Subdivisions												
Split-outs/Combinations												
Sales Verification												
Prior Year Correction Hearings												
Current Year Hearings												
Sketch Scanning												

INDUSTRIAL

	Sep.	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
PP Rendition Penalty Waivers/Hrgs												
Appraisal Contractors:												
Negotiate Contracts												
Assign Accounts												
Land Analysis												
Reinspection/Discovery												
Valuation:												
Industrial Real Property												
Industrial Personal Property												
Permit Research												
New Construction/Value Review												
Prior Year Correction Hearings												
Prior Year Corrections												
Current Year Hearings												

PERSONAL PROPERTY

	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
PP Rendition Penalty Waivers/Hearings												
Appraisal Contractors:												
Negotiate Contracts												
Assign Accounts												
Reinspection/Discovery												
Valuation:												
CAPPA Modeling												
Rendition Rvw/Finalize Values												
Rendition Processing												
Prior Year Correction Hearings												
Prior Year Corrections												
Current Year Hearings												

Residential Market Areas

# APPENDIX: MARKET AREAS

Market Area	Description
100	1A Tanglewood, Galleria, Briargrove Areas
101	1A Westheimer to Westpark, Loop 610 to Gessner
102	1A Sharpstown Area
103	1A Ashford/Briar Hills Areas
110	1B Bellaire, West University, Southampton Areas
111	1B NRG Park, Texas Medical Center Areas
112	1B Linkwood, Willow Meadows, Knollwood Vlg Areas
121	1B South of US 90, West of SH 288
122	1B Meyerland, Maplewood, Westbury Areas
123	1B Fondren Southwest Area
130	1C Midtown, Riverside Terrace, University Areas
132	1C South of Old Spanish Trail btwn SH 288 and I-45
140	1D Navigation, Harrisburg, Lawndale Areas
142	1D Lyons, Denver/Houston Harbor, Pleasantville
143	1D Park Place, Glenbrook, Oak Meadows Areas
150	1E Ryon, Irvington, Lindale Areas
151	1E Liberty/Kashmere/Houston/Croyden Gardens Areas
160	1F Lazybrook, Timbergrove, Washington Corridor
161	1F Heights, Brooksmith, Norhill Areas
162	1F Afton Oaks, Highland Village, Weslayan Areas
163	1F Montrose, Fourth Ward Areas
164	1F River Oaks Area
170	1F Highland Heights, Acres Homes, Pinemont Area
171	1F Hempstead Hwy/US 290 Corridor - Langwood Area
172	1F Oak Forest, Garden Oaks, Independence Heights
188	1H Condo - West of Beltway 8
189	1H Condo - South of Westpark Toll South of Loop
190	1H Condo - South of Loop 610 E
191	1H Condo - Far North & East of N Loop 610
192	1H Condo - Heights/I-10 Corridor
193	1H Condo - West of Loop & North of Westpark Toll
194	1H Condo - South of Mem in Loop North of Braeswd
195	1H Condo - South of Braeswood inside Loop 610
196	1H High Rise Luxury
197	1H High Rise Downtown & Midtown
198	1H High Rise General
200	ISD 02 - Deer Park ISD
210	ISD 03 - Waller ISD

220     ISD 04 - Far Northwest, Outside Hwy 6, South of FM 529       221     ISD 04 - Inside Beltway 8       223     ISD 04 - Inside Beltway 8       224     ISD 04 - Northwest, Dtwn Beltway 8 and Hwy 6       225     ISD 04 - Far West, South of US 290/North of FM 529       240     ISD 05 - Crosby ISD       250     ISD 06 - Channelview ISD       260     ISD 07 - New Caney ISD       270     ISD 08 - Alief General       271     ISD 08 - Royal Oaks       272     ISD 09 - Airport Tiers Area       280     ISD 09 - Outside Airport Tiers, East of I-45       281     ISD 09 - Outside Airport Tiers, West of 1-45       282     ISD 09 - Outside Airport Tiers, West of 1-45       290     11 Former North Forest ISD       310     ISD 16 - South of SH 146 (Baytown Lee Area)       311     ISD 16 - North of 1-10 (Baytown Memorial Area)       320     ISD 17 - Klein ISD       331     ISD 18 - Nitside Airport Tiers, Atascocita Area       332     ISD 18 - North of 1-10 Katy Freeway       341     ISD 19 - South of 1-10 Katy Freeway       351     ISD 20 - East of Bay Area Blvd       351<		
223     ISD 04 - Inside Beltway 8       224     ISD 04 - Northwest, btwn Beltway 8 and Hwy 6       225     ISD 04 - Far West, South of US 290/North of FM 529       240     ISD 05 - Crosby ISD       250     ISD 06 - Channelview ISD       260     ISD 07 - New Caney ISD       271     ISD 08 - Alief General       271     ISD 08 - Alief General       271     ISD 08 - Alief Condos       280     ISD 09 - Airport Tiers Area       281     ISD 09 - Outside Airport Tiers, East of I-45       282     ISD 09 - Outside Airport Tiers, West of I-45       280     ISD 19 - Outside Airport Tiers, West of I-45       280     ISD 16 - South of SH 146 (Baytown Lee Area)       310     ISD 16 - South of I-10 (Baytown Memorial Area)       311     ISD 16 - South of I-10 (Baytown Memorial Area)       320     ISD 17 - Klein ISD       330     ISD 18 - Kingwood Area       331     ISD 18 - Outside Airport Tiers, Atascocita Area       332     ISD 18 - North of I-10 (Katy Freeway       341     ISD 19 - South of I-10 Katy Freeway       350     ISD 20 - East of Bay Area Blvd       351	220	ISD 04 - Far Northwest, Outside Hwy 6
224     ISD 04 - Northwest, btwn Beltway 8 and Hwy 6       225     ISD 04 - Far West, South of US 290, btwn Beltway 8 and Hwy 6       227     ISD 04 - Far West, South of US 290/North of FM 529       240     ISD 05 - Crosby ISD       250     ISD 06 - Channelview ISD       260     ISD 07 - New Caney ISD       270     ISD 08 - Alief Ceneral       271     ISD 08 - Royal Oaks       272     ISD 09 - Alief Condos       280     ISD 09 - Outside Airport Tiers, East of I-45       281     ISD 09 - Outside Airport Tiers, West of I-45       282     ISD 09 - Outside Airport Tiers, West of I-45       280     ISD 16 - South of SH 146 (Baytown Lee Area)       310     ISD 16 - South of SH 146 (Baytown Lee Area)       311     ISD 16 - South of I-10 (Baytown Memorial Area)       320     ISD 17 - Klein ISD       330     ISD 18 - Kingwood Area       331     ISD 18 - Outside Airport Tiers, Atascocita Area       332     ISD 18 - North of I-10 Katy Freeway       341     ISD 19 - South of I-10 Katy Freeway       350     ISD 20 - East of Bay Area Blvd       351     ISD 20 - East of Bay Area Blvd <t< td=""><td>221</td><td>ISD 04 - Southwest, Outside Hwy 6, South of FM 529</td></t<>	221	ISD 04 - Southwest, Outside Hwy 6, South of FM 529
225     ISD 04 - South of US 290, btwn Beltway & and Hwy 6       227     ISD 04 - Far West, South of US 290/North of FM 529       240     ISD 05 - Crosby ISD       250     ISD 06 - Channelview ISD       260     ISD 07 - New Caney ISD       270     ISD 08 - Alief General       271     ISD 08 - Alief Condos       280     ISD 09 - Outside Airport Tiers, East of I-45       281     ISD 09 - Outside Airport Tiers, Kest of I-45       282     ISD 09 - Outside Airport Tiers, West of I-45       280     ISD 15 - Galena Park ISD       310     ISD 16 - South of SH 146 (Baytown Lee Area)       311     ISD 16 - Baytown Sterling Area       312     ISD 18 - North of I-10 (Baytown Memorial Area)       320     ISD 18 - North of I-10 (Baytown Memorial Area)       321     ISD 18 - North of I-10 (Baytown Memorial Area)       322     ISD 18 - North of I-10 Katy Freeway       331     ISD 18 - Outside Airport Tiers, Atascocita Area       322     ISD 18 - North of I-10 Katy Freeway       330     ISD 19 - North of I-10 Katy Freeway       341     ISD 19 - North of I-10 Katy Freeway       350     ISD 20 - West of Bay A	223	ISD 04 - Inside Beltway 8
227     ISD 04 - Far West, South of US 290/North of FM 529       240     ISD 05 - Crosby ISD       250     ISD 06 - Channelview ISD       260     ISD 07 - New Caney ISD       270     ISD 08 - Alief General       271     ISD 08 - Alief Condos       280     ISD 09 - Airport Tiers, Area       281     ISD 09 - Outside Airport Tiers, East of I-45       282     ISD 09 - Outside Airport Tiers, West of I-45       290     1J Former North Forest ISD       300     ISD 16 - South of SH 146 (Baytown Lee Area)       311     ISD 16 - South of SH 146 (Baytown Lee Area)       312     ISD 16 - North of I-10 (Baytown Memorial Area)       320     ISD 18 - Kingwood Area       331     ISD 18 - North of I-10 (Baytown Memorial Area)       332     ISD 18 - Kingwood Area       333     ISD 18 - North of I-10 (Kay Freeway       341     ISD 19 - North of I-10 Kay Freeway       350     ISD 20 - East of Bay Area Blvd       351     ISD 20 - East of Bay Area Blvd       351     ISD 24 - North of Cypress Creek       381     ISD 24 - North of Cypress Creek       381     ISD 25 - Neth	224	ISD 04 - Northwest, btwn Beltway 8 and Hwy 6
240ISD 05 - Crosby ISD250ISD 06 - Channelview ISD260ISD 07 - New Caney ISD270ISD 08 - Alief General271ISD 08 - Royal Oaks272ISD 08 - Alief Condos280ISD 09 - Airport Tiers, Area281ISD 09 - Outside Airport Tiers, Kest of I-45282ISD 09 - Outside Airport Tiers, West of I-452901J Former North Forest ISD300ISD 15 - Galena Park ISD310ISD 16 - South of SH 146 (Baytown Lee Area)311ISD 16 - North of I-10 (Baytown Memorial Area)320ISD 17 - Klein ISD330ISD 18 - Ningwood Area331ISD 18 - Ningwood Area332ISD 19 - North of I-10 Katy Freeway341ISD 19 - South of Bay Area Blvd350ISD 20 - East of Bay Area Blvd360ISD 21 - Pasadena ISD370ISD 24 - North of Cypress Creek381ISD 24 - North of FM 1960382ISD 25 - North of FM 1960393ISD 25 - Memorial Villages, South of I-10394ISD 25 - Memorial Villages North of I-10394ISD 25 - Memorial Villages North of I-10394ISD 25 - North of I-10395ISD 26 - Tomball ISD394ISD 27 - West of NASA Parkway (I-45 Area)	225	ISD 04 - South of US 290, btwn Beltway 8 and Hwy 6
250   ISD 06 - Channelview ISD     260   ISD 07 - New Caney ISD     270   ISD 08 - Alief General     271   ISD 08 - Royal Oaks     272   ISD 08 - Alief Condos     280   ISD 09 - Airport Tiers Area     281   ISD 09 - Outside Airport Tiers, East of I-45     282   ISD 09 - Outside Airport Tiers, West of I-45     280   1J Former North Forest ISD     300   ISD 15 - Galena Park ISD     300   ISD 16 - South of SH 146 (Baytown Lee Area)     311   ISD 16 - South of SH 146 (Baytown Lee Area)     312   ISD 16 - North of I-10 (Baytown Memorial Area)     320   ISD 17 - Klein ISD     330   ISD 18 - Kingwood Area     331   ISD 18 - Ningwood Area     332   ISD 18 - North of I-10 (Katy Freeway     341   ISD 19 - North of I-10 Katy Freeway     350   ISD 20 - West of Bay Area Blvd     351   ISD 20 - West of Bay Area Blvd     360   ISD 21 - Pasadena ISD     370   ISD 23 - Sheldon ISD     380   ISD 24 - North of Cypress Creek     381   ISD 25 - North of H1960     382   ISD 25	227	ISD 04 - Far West, South of US 290/North of FM 529
260     ISD 07 - New Caney ISD       270     ISD 08 - Alief General       271     ISD 08 - Royal Oaks       272     ISD 08 - Alief Condos       280     ISD 09 - Airport Tiers Area       281     ISD 09 - Outside Airport Tiers, East of I-45       282     ISD 09 - Outside Airport Tiers, West of I-45       280     ISD 109 - Outside Airport Tiers, West of I-45       280     ISD 15 - Galena Park ISD       300     ISD 15 - Galena Park ISD       310     ISD 16 - South of SH 146 (Baytown Lee Area)       311     ISD 16 - South of SH 146 (Baytown Lee Area)       312     ISD 16 - North of I-10 (Baytown Memorial Area)       320     ISD 17 - Klein ISD       330     ISD 18 - Kingwood Area       331     ISD 18 - Outside Airport Tiers, Atascocita Area       332     ISD 18 - Nirport Tiers South of San Jacinto River       340     ISD 19 - North of I-10 Katy Freeway       351     ISD 20 - West of Bay Area Blvd       351     ISD 20 - East of Bay Area Blvd       360     ISD 21 - Pasadena ISD       370     ISD 23 - Sheldon ISD       380     ISD 24 - North of I-10 Outside	240	ISD 05 - Crosby ISD
270   ISD 08 - Alief General     271   ISD 08 - Royal Oaks     272   ISD 08 - Alief Condos     280   ISD 09 - Airport Tiers Area     281   ISD 09 - Outside Airport Tiers, East of I-45     282   ISD 09 - Outside Airport Tiers, West of I-45     280   ISD 19 - Outside Airport Tiers, West of I-45     281   ISD 09 - Outside Airport Tiers, West of I-45     282   ISD 09 - Outside Airport Tiers, West of I-45     280   IJ Former North Forest ISD     300   ISD 15 - Galena Park ISD     310   ISD 16 - South of SH 146 (Baytown Lee Area)     311   ISD 16 - South of SH 146 (Baytown Memorial Area)     312   ISD 16 - North of I-10 (Baytown Memorial Area)     320   ISD 17 - Klein ISD     330   ISD 18 - Ningwood Area     331   ISD 18 - Outside Airport Tiers, Atascocita Area     332   ISD 18 - North of I-10 Katy Freeway     341   ISD 19 - North of I-10 Katy Freeway     341   ISD 19 - South of I-10 Katy Freeway     350   ISD 20 - East of Bay Area Blvd     351   ISD 24 - North of Cypress Creek     380   ISD 24 - North of Cypress Creek	250	ISD 06 - Channelview ISD
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272   ISD 08 - Alief Condos     280   ISD 09 - Airport Tiers Area     281   ISD 09 - Outside Airport Tiers, East of I-45     282   ISD 09 - Outside Airport Tiers, West of I-45     290   1J Former North Forest ISD     300   ISD 15 - Galena Park ISD     310   ISD 16 - South of SH 146 (Baytown Lee Area)     311   ISD 16 - Baytown Sterling Area     312   ISD 16 - North of I-10 (Baytown Memorial Area)     320   ISD 17 - Klein ISD     330   ISD 18 - Kingwood Area     331   ISD 18 - Outside Airport Tiers, Atascocita Area     332   ISD 18 - North of I-10 Katy Freeway     341   ISD 19 - North of I-10 Katy Freeway     341   ISD 20 - West of Bay Area Blvd     350   ISD 20 - West of Bay Area Blvd     351   ISD 20 - West of I-45, North of FM 1960     380   ISD 24 - North of I-10 Outside Memorial Villages     390   ISD 25 - North of I-10 Outside Memorial Villages     391   ISD 25 - West of Memorial Villages, South of I-10     392   ISD 25 - North of I-10 Outside Memorial Villages     391   ISD 25 - Spring Branch Condos     394   ISD 25 - Spring Branch Co	270	ISD 08 - Alief General
280ISD 09 - Airport Tiers Area281ISD 09 - Outside Airport Tiers, East of I-45282ISD 09 - Outside Airport Tiers, West of I-452901J Former North Forest ISD300ISD 15 - Galena Park ISD310ISD 16 - South of SH 146 (Baytown Lee Area)311ISD 16 - Baytown Sterling Area312ISD 16 - North of I-10 (Baytown Memorial Area)320ISD 17 - Klein ISD330ISD 18 - Kingwood Area331ISD 18 - Outside Airport Tiers, Atascocita Area332ISD 18 - Airport Tiers South of San Jacinto River340ISD 19 - North of I-10 Katy Freeway351ISD 20 - West of Bay Area Blvd351ISD 20 - West of Bay Area Blvd360ISD 21 - Pasadena ISD370ISD 23 - Sheldon ISD380ISD 24 - North of I-10 Cutside Memorial Villages391ISD 25 - North of I-10 Outside Memorial Villages391ISD 25 - West of Memorial Villages, South of I-10392ISD 25 - Spring Branch Condos394ISD 25 - West of NASA Parkway (I-45 Area)	271	ISD 08 - Royal Oaks
281   ISD 09 - Outside Airport Tiers, East of I-45     282   ISD 09 - Outside Airport Tiers, West of I-45     290   1J Former North Forest ISD     300   ISD 15 - Galena Park ISD     310   ISD 16 - South of SH 146 (Baytown Lee Area)     311   ISD 16 - Baytown Sterling Area     312   ISD 16 - North of I-10 (Baytown Memorial Area)     320   ISD 17 - Klein ISD     330   ISD 18 - Kingwood Area     331   ISD 18 - Outside Airport Tiers, Atascocita Area     332   ISD 18 - Airport Tiers South of San Jacinto River     340   ISD 19 - North of I-10 Katy Freeway     341   ISD 20 - West of Bay Area Blvd     350   ISD 20 - West of Bay Area Blvd     360   ISD 21 - Pasadena ISD     370   ISD 23 - Sheldon ISD     380   ISD 24 - North of Cypress Creek     381   ISD 24 - North of I-10 Outside Memorial Villages     391   ISD 25 - North of I-10 Outside Memorial Villages     391   ISD 25 - West of Memorial Villages, South of I-10     392   ISD 25 - Memorial Villages South of I-10     393   ISD 25 - Spring Branch Condos     394   ISD 25 - Memorial Villages North o	272	ISD 08 - Alief Condos
282ISD 09 - Outside Airport Tiers, West of I-452901J Former North Forest ISD300ISD 15 - Galena Park ISD310ISD 16 - South of SH 146 (Baytown Lee Area)311ISD 16 - Baytown Sterling Area312ISD 16 - North of I-10 (Baytown Memorial Area)320ISD 17 - Klein ISD330ISD 18 - Kingwood Area331ISD 18 - Outside Airport Tiers, Atascocita Area332ISD 18 - Outside Airport Tiers South of San Jacinto River340ISD 19 - North of I-10 Katy Freeway350ISD 20 - West of Bay Area Blvd351ISD 20 - East of Bay Area Blvd360ISD 21 - Pasadena ISD370ISD 23 - Sheldon ISD380ISD 24 - North of I-10 Outside Memorial Villages391ISD 25 - North of I-10 Outside Memorial Villages391ISD 25 - Memorial Villages South of I-10392ISD 25 - Memorial Villages North of I-10393ISD 25 - Memorial Villages North of I-10394ISD 25 - West of NASA Parkway (I-45 Area)	280	ISD 09 - Airport Tiers Area
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400ISD 26 - Tomball ISD410ISD 27 - West of NASA Parkway (I-45 Area)		
410 ISD 27 - West of NASA Parkway (I-45 Area)		-
411 ISD 27 - East of NASA Parkway (Water Area)		
	411	ISD 27 - East of NASA Parkway (Water Area)

### Residential Market Areas

420	ISD 28 - Dayton ISD	
430	ISD 29 - Pearland ISD	
440	ISD 30 - Huffman ISD	
450	ISD 31 - Stafford MSD	

	Office Buildings
Market Area	Description
1	Central Business District
2	South Main
3	Greenway Plaza Richmond Buffalo Speedway
4	Galleria West Loop
5	West Loop South
6	Inner City - West
7	Medical Center Area
8	Brookhollow
9	Northwest Crossing
10	San Felipe Fountainview
11	Westheimer Voss
12	Westchase
13	Westheimer Dairy Ashford
14	Katy Freeway
15	Energy Corridor
16	Far Northwest
17	FM 1960 West
18	Interstate 10 East
19	Near North
20	Greenspoint North Belt
21	Kingwood, Huffman and Humble
22	Baytown
23	Southwest Freeway Near
24	Southwest Freeway Far
25	South
26	Inner Loop East
27	Pasadena
28	Clear Lake
29	West Belt from I-10
30	Park Ten
31	I-45 North & Hwy 249

Warehouse						
Market Area	Description					
1	Central Business District					
2	Inner Loop Southeast					

	Warehouse
Market Area	Description
3	Inner Loop West
4	Inner Loop North
5	Near Southwest
6	Near West
7	Near Northwest
8	Near North
9	Northeast
10	Pasadena - LaPorte
11	Clear Lake
12	Southeast
13	Far Southwest
14	Far Northwest
15	Far North
16	Beltway North
17	Beltway Northwest
18	Beltway Southwest
19	Southwest
20	Inner Loop South
21	Park-Ten
22	East
23	Inner Loop Northwest
24	Tomball
25	Baytown
26	Katy

	Retail
Market Area	Description
1	Central Business District
2	Inner Loop East
3	Inner Loop West
4	Inner North
5	Inner Northeast
6	Inner Northwest
7	Inner South
8	Inner Southeast
9	Inner Southwest

Retail		
Market Area	Description	
10	Inner West	
11	North	
12	Northeast	
13	Northwest	
14	East	
15	Southwest	
16	West	
17	Memorial	
18	South	
19	Clear Lake	
20	Heights	
21	Galleria	
22	Kingwood	
23	Katy	
24	Far Northwest	

Apartments		
Market Area	Description	
1	Montrose/ Museum/ Midtown	
2	Heights/ Washington Ave	
3	Highland Village/ Upper Kirby/ West U	
4	Galleria/ Uptown	
5	Woodlake/ Westheimer	
6	Energy Corridor/ CityCentre/ Briar Forest	
7	Alief	
8	Sharpstown/ Westwood	
9	Almeda/ South Main	
10	Med Center/ Braes Bayou	
11	Downtown	
12	U of H/ I-45 South	
13	Clear Lake/ Webster/ League City	
14	Pasadena/ Deer Park/ La Porte	
15	Beltway 8 / I-45 South	
16	Baytown	
17	Northeast Houston/ Crosby	
18	I-69 North	

Apartments		
Market Area	Description	
19	Lake Houston/ Kingwood	
20	Northline	
21	FM 1960 East/ IAH Airport	
22	Brookhollow/ Northwest Crossing	
23	Inwood/ Hwy 249	
24	Willowbrook/ Champions/ Ella	
25	Tomball/ Spring	
26	Memorial/ Spring Branch	
27	Bear Creek/ Copperfield/ Fairfield	
28	Katy/ Cinco Ranch/ Waterside	
29	Westchase	
30	Westpark/ Bissonnet	
31	Braeswood/ Fondren SW	
32	Jersey Village/ Cypress	
33	I-10 East/ Woodforest/ Channelview	
34	Greenspoint/ Northborough/ Aldine	
35	Hwy 288 South/ Pearland West	
36	Friendswood/ Pearland East	

Hotel	
Market Area	Description
1	Central Business District
2	Galleria / Uptown
3	Texas Med.Ctr. / Reliant Park
4	Southwest Houston
5	Bush Intercontinental Airport
6	Hobby Airport
7	Bay Area
8	Stafford
9	Katy Fwy
10	Northwest
11	East / Baytown
12	Westchase

Market	Description
Area	_
4001	Central Business District
100	Houston ISD - Tanglewood, Galleria, Briargrove Areas
101	Houston ISD - Westheimer to Westpark, Loop 610 to Gessner
102	Houston ISD - Sharpstown Area
103	Houston ISD - Ashford/Briar Hills Areas
110	Houston ISD - Bellaire, West University, Southampton Areas
111	Houston ISD - NRG Park, Texas Medical Center Areas
112	Houston ISD - Linkwood, Willow Meadows, Knollwood Vlg Areas
121	Houston ISD - South of US 90, West of SH 288
122	Houston ISD - Meyerland, Maplewood, Westbury Areas
123	Houston ISD - Fondren Southwest Area
130	Houston ISD - Midtown, Riverside Terrace, University Areas
132	Houston ISD - South of Old Spanish Trail btwn SH 288 and I-4
140	Houston ISD - Navigation, Harrisburg, Lawndale Areas
142	Houston ISD - Lyons, Denver/Houston Harbor, Pleasantville
143	Houston ISD - Park Place, Glenbrook, Oak Meadows Areas
150	Houston ISD - Ryon, Irvington, Lindale Areas
151	Houston ISD - Liberty/Kashmere/Houston/Croyden Gardens Areas
160	Houston ISD - Lazybrook, Timbergrove, Washington Corridor
161	Houston ISD - Heights, Brooksmith, Norhill Areas
162	Houston ISD - Afton Oaks, Highland Village, Weslayan Areas
163	Houston ISD - Montrose, Fourth Ward Areas
164	Houston ISD - River Oaks Area
170	Houston ISD - Highland Heights, Acres Homes, Pinemont Area
171	Houston ISD - Hempstead Hwy/US 290 Corridor - Langwood Area
172	Houston ISD - Oak Forest, Garden Oaks, Independence Heights
188	Houston ISD - Condo - West of Beltway 8
189	Houston ISD - Condo - South of Westpark Toll South of Loop
190	Houston ISD - Condo - South of Loop 610 E
191	Houston ISD - Condo - Far North & East of N Loop 610
192	Houston ISD - Condo - Heights/I-10 Corridor
193	Houston ISD - Condo - West of Loop & North of Westpark Toll
194	Houston ISD - Condo - South of Mem in Loop North of Braeswd
195	Houston ISD - Condo - South of Braeswood inside Loop 610
196	Houston ISD - High Rise Luxury
197	Houston ISD - High Rise Downtown & Midtown
198	Houston ISD - High Rise General

### Commercial Vacant Market Areas

Market	Description
Area	1
200	Deer Park ISD
210	Waller ISD
220	Cypress Fairbanks ISD - Far Northwest, Outside Hwy 6
221	Cypress Fairbanks ISD - Southwest, Outside Hwy 6, South of FM 52
223	Cypress Fairbanks ISD - Inside Beltway 8
224	Cypress Fairbanks ISD - Northwest, btwn Beltway 8 and Hwy 6
225	Cypress Fairbanks ISD - South of US 290, btwn Beltway 8 and Hwy
227	Cypress Fairbanks ISD - Far West, South of US 290/North of FM 52
240	Crosby ISD
250	Channelview ISD
260	New Caney ISD
270	Alief ISD - Alief General
271	Alief ISD - Royal Oaks
272	Alief ISD - Alief Condos
280	Aldine ISD - Airport Tiers Area
281	Aldine ISD - Outside Airport Tiers, East of I-45
282	Aldine ISD - Outside Airport Tiers, West of I-45
290	Houston ISD - Former North Forest ISD
300	Galena Park ISD
310	Goose Creek ISD - South of SH 146 (Baytown Lee Area)
311	Goose Creek ISD - Baytown Sterling Area
312	Goose Creek ISD - North of I-10 (Baytown Memorial Area)
320	Klein ISD
330	Humble ISD - Kingwood Area
331	Humble ISD - Outside Airport Tiers, Atascocita Area
332	Humble ISD - Airport Tiers South of San Jacinto River
340	Katy ISD - North of I-10 Katy Freeway
341	Katy ISD - South of I-10 Katy Freeway
350	La Porte ISD - West of Bay Area Blvd
351	La Porte ISD - East of Bay Area Blvd
360	Pasadena ISD
370	Sheldon ISD
380	Spring ISD - North of Cypress Creek
381	Spring ISD - West of I-45, North of FM 1960

## Commercial Vacant Market Areas