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Appraisal Review

Critical Review of Appraisal Report

Subject: Proposed self-storage development (3 buildings, 10,800 SF) on ±1.00 acre

Reported address: [REDACTED]

Client/Intended user: City National Bank

Inspection date: December 14, 2023

Report date: December 21, 2023

Effective date(s) stated in report: "As Is, as of December 14, 2023" (cover) vs "As Completed, effective May 1, 2024" (transmittal & analyses)

Value conclusion stated: "As Completed" \$600,000; "As-is land value only" \$62,500

Standards emphasized: USPAP (SR 1 & SR 2) and Appraisal Institute methodology (The Appraisal of Real Estate).

Executive Summary – Material Deficiencies That Undermine Credibility

- Internal contradictions on effective date and assignment:** Cover page suggests an "As Is" value as of **December 14, 2023**, while the Letter of Transmittal and valuation sections conclude "As Completed" market value with an effective date of **May 1, 2024**. This is a material reporting defect because users cannot reliably determine *what* is being valued *as of which date and under what condition*.
- Inconsistent and possibly incorrect county identification / data source mismatch:** The report states the property is in an "unincorporated area of **Gallia County**," but the report also states taxes/assessments are from **Lawrence County** assessor records and the sales-history exhibit shows Lawrence County conveyance records. That inconsistency is material because it impacts zoning, taxation, floodplain administration, permitting, and market-area selection.
- Highest & Best Use analysis is conclusory and incomplete:** The analysis does not properly apply the four tests (physically possible, legally permissible, financially feasible, maximally productive) for both "as vacant" and "as improved," and it leans on borrower statements ("Your appraiser agrees.") rather than market-supported feasibility.
- Sales comparison is not a true comparable analysis:** The appraiser averages 8 CoStar sales across a 300-mile radius (multiple states) and applies a simple average \$/SF without demonstrated adjustments for location, market class, occupancy at sale, economic characteristics, or time. This is a major credibility issue for SR 1-4 and SR 1-6.
- Income approach relies on unsupported pro forma assumptions:** Occupancy, rent, expenses, and cap rate are weakly supported, and there are internal errors/oddities (e.g., "Apartments are a valuable and stable asset..." used to justify equity return in a self-storage appraisal).

1) Factual Inaccuracies / Red Flags in Property Identification & Core Facts

A. County / Jurisdiction conflict (material)

- The narrative states the property is in “an unincorporated area of **Gallia County, OH**,” yet the report repeatedly references **Lawrence County** sources for tax/assessment and deed recording. These are not interchangeable.
- The sales-history table and deed images show Lawrence County recorder/auditor processing (as reproduced in the report), indicating the parcel is likely in Lawrence County—consistent with SR 217 being in Lawrence County (and the report’s own depiction of SR 217 context).
- **Why it matters (USPAP):** SR 1-2(e) and SR 2-1 require correct identification of the real estate and relevant characteristics. A county error can invalidate zoning conclusions, tax conclusions, flood determinations, and market delineation.

B. Effective date / “As Is” vs “As Completed” contradictions (material)

- Cover indicates “Effective Date As Is, as of **December 14, 2023**.”
- Letter of Transmittal: “As Completed, with an effective date of **May 1, 2024**.”
- Salient facts page: “As Is” and “As Completed” are both shown; “MARKET VALUE ESTIMATES: As Completed \$600,000; As-is (land value only) \$62,500.”
- **Why it matters:** This creates confusion about the appraisal problem, scope, and intended use; SR 2-2(a) requires clear disclosure of the effective date and the property’s condition as appraised.

C. Flood determination statement appears overconfident given map age / update risk

- Report cites panel [REDACTED] with an effective date of **March 16, 2006** and states the subject “is not located within any identified flood hazard area.”
- **Problem:** FEMA flood mapping is frequently updated; relying on a 2006 panel without demonstrating that it remained the effective product as of the appraisal’s effective date(s) (Dec 14, 2023 and/or May 1, 2024) is risky. FEMA explicitly indicates flood maps are updated and the MSC is the official source. ([fema.gov](https://www.fema.gov/flood-maps?utm_source=openai))
- **Why it matters:** Flood zone affects insurability, feasibility, cost, and in some cases legally permissible use.
- **Note:** FEMA also publishes “Letters of Final Determination” (LFDs) setting new effective dates for updated FIRMs; [REDACTED] communities can have new effective dates in 2024 (the report’s “as completed” effective date is in 2024). ([fema.gov](https://www.fema.gov/flood-maps/change-your-flood-zone/letter-final-determination/2024?utm_source=openai))

D. “Zoning: Unzoned” and “permitted” conclusion is not properly supported

- The report concludes “there is no zoning” and that self-storage “would be permitted.”
- **Material issue:** Even where conventional zoning is absent, land use is frequently regulated through township/county zoning resolutions, floodplain ordinances, building codes, driveway permits, health department septic approvals, and potentially conditional-use processes. The report does not cite a governing resolution, does not identify the authority having jurisdiction, and does not document confirmation.
- **USPAP angle:** SR 1-2(e) requires identifying legal characteristics; SR 1-3 requires analyzing the effect on value. A conclusory “therefore permitted” is not adequate support.

E. Utilities statement is internally inconsistent and likely incomplete

- Site description says “All present except sewer (septic tank).” Another section claims the land is “served with water, sewer by septic tank, telephone, electric, TV cable and gas.”
- **Issue:** “Sewer by septic tank” is not “sewer service”; it is onsite wastewater. For self-storage, water/sewer may be minimal, but if an office/restroom is planned, septic permitting and system capacity are feasibility items. The report does not confirm approvals, soil suitability, or required system type.

2) Market Area Description – Factual Weaknesses & Unsupported Trends

A. Market area section relies on Wikipedia demographics (not market analysis)

- The report's "General Area Data" is copied from Wikipedia and provides population counts and household characteristics, but it does not analyze **self-storage demand drivers** (household formation, renter share, mobility, downsizing, business inventory needs, etc.) nor does it tie these to rent/occupancy expectations.
- **USPAP:** SR 1-3 and SR 1-4 require market analysis relevant to the property type and intended use. Wikipedia demographics are not a substitute for market feasibility analysis.

B. Residential market trend evidence contradicts implied "strong value growth" narrative

- The appraisal suggests a stable/positive environment to support rapid lease-up and \$600,000 value, but available market indicators show softness/volatility in the local residential market.
- Zillow shows Crown City typical home value around **\$136k-\$139k** with a **decline of ~1.5% to 2.5% over the past year** (data through late 2025). ([\[zillow.com\]](https://www.zillow.com/home-values/51606/crown-city-oh/?utm_source=openai))
- Redfin reports a very small sample but shows the median sale price down substantially year-over-year (again, small sample caveat). ([\[redfin.com\]](https://www.redfin.com/city/5041/OH/Crown-City/housing-market?utm_source=openai))
- **Why this matters:** For rural trade areas, housing-market stagnation can correlate with weaker discretionary spending and potentially weaker storage demand; at minimum, it should have been discussed and reconciled rather than ignored.

C. Self-storage competitive set is underdeveloped and borrower-led

- The report heavily relies on the borrower's statements: "only two facilities in Proctorville," "none north until Pomeroy," and "90% full most all of the time."
- **Problem:** This is not a documented market survey. At minimum, the report should inventory competitors (addresses, unit mix, occupancy proxies, published rates, distance/radius, visibility/access), and reconcile whether the proposed unit mix matches local demand.
- Publicly available rate information indicates multiple operators and rate points in/near Proctorville, and pricing appears competitive/variable (examples below), undermining the "underserved" conclusory narrative:
 - Mini Mall Storage – Proctorville rates shown publicly (e.g., 10x10 in the ~\$78-\$89 range depending on availability). ([\[storage.com\]](https://www.storage.com/self-storage/ohio/proctorville/mini-mall-storage-proctorville-233091/?utm_source=openai))
 - IncaAztec Self Storage (Proctorville) shows published rates including 10x10 at \$65 and 10x20 around \$104 (as of the crawl date). ([\[rentcafe.com\]](https://www.rentcafe.com/storage/oh/proctorville/incaaztec-self-storage-460-township-road-1161/default.aspx?utm_source=openai))
 - Tri-State Mini Storage website shows rates at the subject address area and indicates a "brand new, modern facility," suggesting that competition and supply may have evolved after the report date (or the market was already more active than portrayed). ([\[tristateminstorage.com\]](https://www.tristateminstorage.com/?utm_source=openai))

3) Site / Improvement Description – Photo & Plan Consistency Issues

A. Net usable site area vs "1 acre" is not reconciled

- The survey exhibit (as included in the report) shows a noted "usable area" and also references roadway right-of-way area. If a material portion is roadway R/W or encumbered, the site's effective utility for three buildings + drives may be less than "1 acre" in a way that affects layout, circulation, stormwater, and fire access.
- The report does not discuss how R/W impacts buildable area, setbacks, access permits, or site efficiency—critical for self-storage where circulation drives value.

B. Proposed improvements description is marketing language, not specifications

- "Game changer," "auto-attended requiring no labor whatsoever," etc. are narrative claims rather than objective descriptions.

- The report lacks detail on:
 - paved vs gravel drives (gravel is assumed), thickness/spec, drainage/stormwater design;
 - fire/life safety access requirements and turning radii;
 - lighting photometrics/security camera coverage;
 - electrical service capacity and whether 3-phase is needed/available;
 - any office/restroom (which triggers septic/water needs) versus pure drive-up units.
- **USPAP relevance:** SR 1-2(e) requires identifying physical characteristics relevant to value; for a proposed project, missing specs directly affect the cost approach and risk/lease-up assumptions.

4) Sales History Research / Summary – Errors & Omissions

A. “No other transfers within the previous three years” conflicts with table

- The report states: “No other transfers... within the previous three years of the date of inspection.”
- However, the sales-history exhibit reproduced in the report shows multiple events in 2023 (including a sale around \$62,500 in November 2023 and other conveyance entries). This is, at minimum, confusing and not clearly explained (e.g., related-party transfers vs arms-length).
- **USPAP:** SR 1-5 requires analysis of prior sales of the subject for relevant periods. The narrative should reconcile the record.

B. The land value is essentially set equal to the prior sale price without adequate verification

- The land value conclusion equals the reported purchase price (\$62,500) and the appraiser states raising it would be “idle speculation.”
- **Problem:** A purchase price is not automatically market value. The appraisal does not adequately:
 - verify exposure time and marketing history of the land sale;
 - confirm whether it was arms-length;
 - analyze whether demolition costs, site preparation, or unusual motivations affected price.
- As a result, both the “as-is” value and the cost approach foundation (land component) are weak.

5) Adjustments & Sales Comparison Methodology – Major Errors

A. Averaging \$/SF across very different markets is not a compliant adjustment process

- The report selects 8 sales within 300 miles and concludes the subject equals the average \$/SF (~\$56/SF) without showing line-item adjustments (market conditions, location, age/condition, occupancy, economic characteristics, quality, unit mix, land-to-building ratio, expansion potential, etc.).
- Self-storage pricing is highly sensitive to **market rent levels, occupancy, visibility/traffic, competition, and expansion land**—none of which are adjusted or even meaningfully analyzed.
- **USPAP:** SR 1-4 and SR 1-6 require analysis and reconciliation based on relevant elements of comparison. A simple mean of distant sales is generally not credible for a rural micro-market property.

B. Time adjustment / market conditions adjustment is absent

- Comparable sales used range mainly 2022–2023; the “as completed” effective date is May 1, 2024.
- The appraisal includes no demonstrated time adjustment or evidence that prices were stable from sale date to effective date.
- **Why it matters:** Cap rates, lending markets, and buyer appetite can shift quickly; without time analysis, the \$/SF conclusion is fragile.

C. Selection criteria excludes relevant comparables and over-weights land constraint similarity

- The appraiser filtered out sales where land was “much greater than 1 or 1.5 acres,” seeking minimal excess land.
- **Problem:** In self-storage valuation, excess land can be a contributory feature (expansion option) and the market often prices it. Excluding those sales may bias results downward or upward depending on how the market prices expansion potential, but the appraisal does not analyze that effect.

6) Comparable Sales Facts – Verification Concerns

A. Several “comps” appear to still be marketed / operated and include different economic characteristics

- Example: 1504 E 10th St, Jeffersonville, IN appears as a marketed self-storage facility page (LoopNet). ([loopnet.com] (https://www.loopnet.com/Listing/1504-10th-Jeffersonville-IN/27780886/?utm_source=openai))
- Economic characteristics (occupancy, management intensity, tenant mix, delinquency, auction activity, security features) can vary dramatically and materially affect price; the report provides no rent roll, T-12, or occupancy-at-sale verification for most comps.
- Example: 2140 Lakeside Dr, Lynchburg, VA is described publicly as having additional land and potential expansion; the report treats it as just another \$/SF point. ([loopnet.com] (https://www.loopnet.com/Listing/2140-Lakeside-Dr-Lynchburg-VA/12388050/?utm_source=openai))

B. Geographic comparability is weak

- The map shows comps spread across multiple states and metro contexts. Rural OH River market behavior is not necessarily bracketed by Dayton, OH or Lynchburg, VA or Jeffersonville, IN pricing without adjustments.

7) Alternative Sales & Better Comparable Strategy (Online Search-Based)

Important limitation

Because the appraisal's sales grid relies on CoStar comp sheets (not full MLS/record detail) and because rural specialty-property transactions can be difficult to verify publicly without subscription databases, the most defensible “alternative sales” strategy here is to identify (a) **closer-in self-storage transactions** in the immediate Ohio River micro-region, and (b) **current competitive facilities** whose asking rents/occupancy can support a higher stabilized NOI and thus a higher value indication.

A. The report itself signals a “closer, newer competitor” at/near the subject address

- [REDACTED]
- [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
- If the subject is now operating, there may be **actual rent/occupancy data** that should replace speculative pro forma assumptions, likely supporting a different (potentially higher) value.

B. Alternative “rent-supported” value indication suggests different conclusions may be warranted

- The appraisal's income approach uses a pro forma and then applies a ~9.773% cap rate to an "average" NOI concept.
- Publicly posted competitor rates in Proctorville show 10x10 often priced around the high-\$70s to ~\$89 at Mini Mall (availability-based), and \$65 at IncaAztec, with 10x20 around ~\$104. ([storage.com](https://www.storage.com/self-storage/ohio/proctorville/mini-mall-storage-proctorville-233091/?utm_source=openai))
- **Argument:** A defensible alternative analysis would:
 - extract a market rent range from multiple competitors (not just two screenshots);
 - apply realistic vacancy/credit loss and an expense ratio supported by comparable self-storage financials (including remote management platform costs, bad debt, marketing, insurance, property taxes, repairs, snow/grounds, and reserves);
 - select a cap rate derived from regional self-storage sales with documented NOI (not mortgage constants alone).
- Given that competitor rate evidence exists and appears consistent with (or higher than) the borrower's pro forma, a properly constructed stabilized NOI could support a value **above** the appraisal's \$570,000 income indication—particularly if actual operations show stronger-than-projected occupancy or ancillary income (late fees, admin fees, tenant insurance commissions, etc.).

C. Alternative sales search that the appraiser should have performed (method critique)

- The appraiser should have searched and reported **closer geographic self-storage transactions** within the immediate [REDACTED] even if that required expanding date ranges or size brackets and then applying reasoned adjustments.
- Instead, the report selected a broad 300-mile radius and then used a simple average. That approach is vulnerable to challenge because it ignores the foundational appraisal concept that **market value is market-specific**, and "the market" here is a rural micro-market rather than a multi-state mean.

Additional USPAP / AI Reporting & Logic Defects

A. Improper "no hypothetical conditions / no extraordinary assumptions" language for a proposed project

- The report states "no hypothetical conditions," and "no extraordinary assumptions other than this is a proposed development..."
- **Material issue:** "As Completed" valuation for a not-yet-built project almost always relies on extraordinary assumptions about completion per plans/specs, permits, costs, and timing. The report mentions completion but does not robustly disclose and analyze the risks (construction delays, cost overruns, permitting/health dept approvals, driveway permits, etc.).

B. Capitalization rate development is not well supported

- The cap rate is built from a "band of investment" with assumed terms (80% LTV, 7.5% rate, 20-year amortization) and an equity rate, but the narrative justification is internally inconsistent and references apartments (not self-storage).
- **USPAP:** SR 1-4 requires that methods and techniques be appropriate and properly supported; SR 2 requires clear reporting.

C. Reconciliation is mechanical (1/3 weighting each) without explanation

- The appraisal assigns ~33% weight to each approach and averages them.
- **Issue:** In appraisal practice (AI), reconciliation should reflect the relative reliability of each approach given data quality, property type, and assignment conditions. Here, the sales comparison is weakly adjusted, the cost approach uses a "hybrid" cost estimate, and the income approach is speculative—yet each is weighted equally. This is not persuasive reasoning.

Material Fault List (Quick Reference)

- **County/jurisdiction inconsistency** (███████████) affecting zoning/taxes/market delineation.
- **Effective date and “as-is vs as-complete” contradictions** across cover/transmittal/salient facts.
- **Flood map reliance on 2006 panel without demonstrating it remained effective** as of 2023/2024; no MSC evidence cited. (fema.gov)(https://www.fema.gov/flood-maps?utm_source=openai)
- **Zoning conclusion unsupported** (no governing code cited; “therefore permitted” leap).
- **Utilities statements inconsistent** and feasibility approvals (septic) not verified.
- **Sales comparison approach is essentially an unadjusted average** of distant sales; lacks market condition and location adjustments.
- **Income approach assumptions weak** and cap-rate narrative contains irrelevant property-type commentary.
- **Equal-weight reconciliation** is mechanical and not credibility-driven.

How These Deficiencies Likely Depress (or Misstate) Value

- **Underspecified market and feasibility analysis** tends to undervalue a proposed facility when actual competitor rents and modern operations (remote management, tenant insurance, dynamic pricing) support higher stabilized NOI—especially if the facility is in fact already operating/advertising at the subject address.
- **Over-broad comp selection without adjustments** can understate value in a supply-constrained micro-market because it imports pricing from dissimilar markets (some potentially lower-demand or functionally inferior facilities) and averages them rather than bracketing and adjusting.
- **Failure to verify legal/permitting feasibility** can cause an appraiser to “play it safe” with conservative conclusions; conversely it can also create hidden risk. Either way, the report does not manage the risk transparently, reducing credibility for lending decisions.

Conclusion (Review Opinion)

Under USPAP's credibility framework (Standards 1 and 2), this report contains multiple material deficiencies—especially the county/jurisdiction inconsistency, contradictory effective dates/conditions, and the sales comparison method that substitutes an unadjusted multi-state average for a true comparable analysis. The income approach and H&BU discussion are likewise insufficiently supported and overly reliant on borrower narrative. These issues materially impair the reliability of the \$600,000 "As Completed" conclusion and the \$62,500 "As-Is land" conclusion, and they provide substantial grounds for the client to request correction, revision, or a new appraisal with a properly defined market area, verified legal status, and locally supported income and sales evidence.

Sources used (public web)

Term	Percentage
Climate change	100
Global warming	100
Green energy	100
Carbon footprint	91
Sustainable development	100
Renewable energy	100
Emissions reduction	100
Green economy	100
Carbon tax	81
Carbon pricing	100

Note: This is a critical review and does not constitute an appraisal or an independent value conclusion. It is focused on credibility, internal consistency, and reasonableness of analyses and reporting under generally recognized appraisal standards.

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17. Contact Information Vallink LLC contactvallink@gmail.com

Accepted By:

VL

Accepted On:

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