

Appraisal Group of Central Oregon, LLC

Appraisal / Consulting / Review / Litigation Support

Gregory W. Moore, MAI

AGCO – Moore Valuation, Inc.
60602 Woodside Rd.
Bend, Oregon 97702

Ph: (541) 480-6527
Fax: (541) 312-3063
greg@agco-appraisal.com



Marlo T. Dill, ARA

AGCO – Dill & Associates, LLC
1894 NE McKay Creek Rd.
Prineville, OR 97754

Ph: (541) 447-6641
Fax: (541) 447-6642
agappraiser@prinetime.net

Representative Paul Holvey
900 Court St NE, H-277,
Salem, OR, 97301
Rep.PaulHolvey@oregonlegislature.gov

February 7, 2017

Re: Opposition to House Bill 2501

Dear Representative Holvey,

As an Oregon State Certified General real estate appraiser in good standing, I strongly encourage you to deny the passing of Oregon House Bill 2501. House Bill 2501 is allegedly intended to alleviate the appraiser shortage in Oregon, which is certainly a real problem. However, the law is not written in the best interest of the residents of Oregon, is illegal under Dodd-Frank, and is most likely to trigger an anti-trust investigation relative to the setting of fees. Of particular note, I direct you to the following:

HB 2501 - Section 3

- (1) The Appraiser Certification and Licensure Board shall **adopt rules establishing the payment rates for independent contractor appraisers.**
- (2) The board shall **establish the payment rates based on the customary and reasonable rates of pay for independent contractor appraisers in this state.** In calculating the rates, the board shall take into consideration academic studies, independent private sector surveys and any other factor affecting compensation rates.

The proposed regulatory action focuses on one element of the appraisal profession (lending appraisals for residential properties), and places a blanket restriction on the profession, which covers a wide range property types, client types, and intended uses, far beyond the capacity of the ACLB to fully cover.

Such an action is not only a violation of anti-trust laws, it is completely contrary to the intention expressed to expand the pool of appraisers in light of the current shortage of appraisers. It is impossible for a regulatory agency (ACLB) to derive “reasonable” fees for the endless complexity of property types, client types, intended uses, and delivery schedules for appraisal services. Restricting the ability of appraisers to negotiate fees with clients will assuredly make it less appealing to work in those areas of the State where the appraisal shortage is worst, exacerbating delays for appraisal service in those areas.

In closing, House Bill 2501 is completely contrary to the respect of professionalism, would interfere with the relationship between the professional and his client, would represent great expense to the State, and would surely be counter-productive to alleviating the delays for appraisal services. I strongly recommend you vote “**No**” on House Bill 2501.

Sincerely,

Gregory W. Moore, MAI
Oregon State Certification No. C000607