

From: MARK PERCIVAL
To: [Regulatory Comments](#)
Subject: Appraisal Thresholds
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I am writing as a Professional Real Estate Appraiser to share my concerns over your desire to increase the threshold of de minimus valuations. I believe this will put many financial institutions in a risky situation, due to the various issues that maybe involved with each subject property being valued. It could be terrain, or environmental contamination, or external obsolescence, that may not be detected by a software program, or inexperienced people viewing, and valuing. There may be right of way issues, easements someone not trained could miss.

I have thought for the last couple of years, an increase in the threshold is appropriate, but not to this level of one million dollars!!! A level of \$400k to \$500k I would think is more reasonable. And maybe have a limit of how many they can do depending on the financial strength of the institution, and their track record of risk exposure.

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