

From: Greg Hansen
To: [Regulatory Comments](#)
Subject: Real Estate Appraisals
Date: Friday, November 30, 2018 8:30:26 PM
Attachments: [Greg Hansen.vcf](#)

To whom it may concern,

I am exceedingly concerned about the proposed rule to increase the appraisal threshold for non-residential loans to \$1,000,000. I see this as a highly dangerous proposition which has the potential for serious consequences. I am a commercial real estate appraiser and have worked with credit unions in the past. It has been my experience that roughly 20 to 30 percent of the properties appraised for purchases enter contract above market value as determined through the appraisal process, and without a proper appraisal in place, it is possible if not likely that there will be an abundance of lending in excess of the value of the underlying asset. This is a problem not just for the banking industry, but as we saw in 2009, the Country at large (if you increase it to \$1,000,000 it is likely that bank regulatory agencies will follow suit). I urge you to consider a substantially lower threshold as the risk involved in quadrupling the current threshold is just too great. Thank you for your time.

best,

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