

**From:** Greg Wasik  
**To:** [Regulatory Comments](#)  
**Subject:** comments on 12 CFR Part 722 Real Estate Appraisals  
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Having worked as a commercial real estate appraiser since 1992, I strongly recommend NCUA to not move forward with the proposed increase of the appraisal de minimis threshold of mandatory appraisal orders to \$1,000,000.

As an appraiser who has in the past 26 years completed commercial appraisals covering billions of dollars of real estate, many purchase and loan transactions at levels well below the \$1,000,000 threshold are not viable at loan-to-value ratios requested by the borrowers and/or quoted by lenders. Taking the expert appraisal opinion out of the loan process will undoubtedly lead to higher loan losses by credit unions.

Having an independent party analyze the loan collateral in a reasonable time period and for a reasonable fee can only help to minimize loan losses. Having worked through multiple real estate corrections with steep value declines, the industry should not need help contribute to loan losses via removing this important step and part of the loan process.

On behalf of borrowers and lenders I strongly suggest you reconsider raising the de minimis threshold amount to \$1,000,000 for commercial real estate credit union loans and moving forward with this high risk proposal.

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