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**To:** [Regulatory Comments](#)  
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Please do NOT increase the appraisal threshold to \$1,000,000 as this is highly risky to our credit unions, CU share members, NCUA, investment community, and taxpayers. The \$250,000 threshold was an accommodation so that appraisal fees would not be a hindrance to or significant percentage of relatively small loan amounts while weighed against the inherent risk of such small loans, given margin of error from valuations not based on professional appraiser opinions.

Recently the federal banking agencies, against public outcry and professional opinions, nonetheless increased their threshold to \$500,000. This means that many loans no longer need professional opinions of value via appraisals, which significantly increases risk to depositors, lenders, investors, and taxpayers. This is especially relevant for loans other than tract homes where professional valuation is a necessity to render a reliably credible valuation for collateral lending purposes.

But for NCUA to increase their threshold to \$1,000,000 is irresponsibly risky and sets up an "arms race" between the lending agencies who are trading in increased risk to money that does not belong to them in many cases. If increased to \$1,000,000 I pledge to withdraw all my interests in CUs as they will be trading in unnecessarily high risk. Why is the risk pendulum swinging back to lenient lending practices with decreasing due diligence so soon after The Great Recession? Has the NCUA forgotten their losses so soon?

Please maintain the \$250,000 threshold.

And if this is not to be so, please do NOT increase past the \$500,000 threshold recently set by the federal banking agencies.

Thank you,

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