

From: Tierney Lalor
To: [Regulatory Comments](#)
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Do not raise the threshold to \$1,000,000. The risk is too great. Many SBA types of properties are difficult to appraise because there are few comparables, especially in rural areas. So, why place so much importance on an offer price, when the actual value can vary by so much.

Properties in the \$500,000 to \$1,000,000 range in small towns can be so dependent on demand and the local economy that an appraisal is so important.

Another consideration is that for taverns and restaurant properties, buyers, sellers, and real estate agents consistently include FFE and business value in the listing for the real estate that an appraiser is needed to adequately assign the appropriate value to the real property.

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