

ESTIMATING COMMERCIAL REAL ESTATE LOSSES

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The views expressed herein are solely those of the author and do not necessarily reflect those of the Federal Reserve Bank of Chicago

Loss Estimation is key ...

- ▣ To Stress Testing
- ▣ To Capital Adequacy analysis
- ▣ To Loan Provisioning analysis

- ▣ Key Principles:
 - Be careful of applying broad loss rates to individual portfolios.
 - Capital is for unexpected losses, not expected losses.
 - Concentration & correlation increase volatility.
 - Community banks can do a good job at this.

The SCAP Approach

- ▣ Constraints: limited by data, time and the need for consistent treatment across firms.
- ▣ Divided the portfolio into a series of subportfolios and separately estimated losses for each of them.
- ▣ Subportfolios include:
 - Construction (residential & commercial)
 - Owner Occupied CRE
 - Multi-family and non-farm, non-residential
 - Foreign and special portfolios
 - Term defaults and refinance defaults

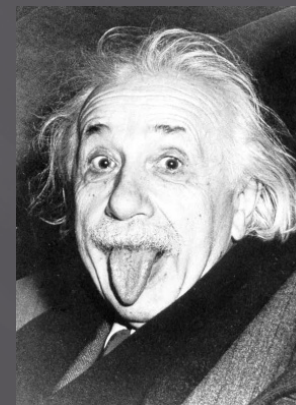
Cyclical Shifts vs. Regime Shifts

Case 1: Traditional			Case 2: Bubble Period			Case 3: Post Bubble		
SF		100,000	SF		100,000	SF		100,000
Rent PSF		\$ 20	Rent PSF		\$ 22	Rent PSF		\$ 18
Gross Potential Rent		\$ 2,000,000	Gross Potential Rent		\$ 2,200,000	Gross Potential Rent		\$ 1,800,000
Vacancy	15%	\$ (300,000)	Vacancy	10%	\$ (220,000)	Vacancy	20%	\$ (360,000)
Net Rental Revenue		\$ 1,700,000	Net Rental Revenue		\$ 1,980,000	Net Rental Revenue		\$ 1,440,000
Operating Expenses		\$ 300,000	Operating Expenses		\$ 300,000	Operating Expenses		\$ 300,000
Net Operating Income		\$ 1,400,000	Net Operating Income		\$ 1,680,000	Net Operating Income		\$ 1,140,000
Cap Rate	9%		Cap Rate	6%		Cap Rate	9%	
Value		\$ 15,555,556	Value		\$ 28,000,000	Value		\$ 12,666,667
Max LTV	75%		Max LTV	80%		Current LTV	177%	
Loan Amount		\$ 11,666,667	Loan Amount		\$ 22,400,000	← Loan Amount		\$ 22,400,000
Debt Service	8%, 30 years		Debt Service	6%, Int Only		Debt Service	8%, 30 years	
		\$ 85,605.87			\$ 1,344,000			\$ 164,363.26
		\$ 1,027,270			\$ 1,344,000			\$ 1,972,359
DSCR		1.36	DSCR		1.25	DSCR		0.58

Changing the cap rate only accounts for 41% of the value change.
 Changing the NOI only accounts for 59% of the value change.

CRE loss estimation for Community Banks

- ▣ SCAP used a series of national 2 year loss rates through 2010 that may not be appropriate for community banks.
- ▣ Historical data may not be helpful. We live in unprecedented times.
- ▣ Many banks are counting on a V-shaped recovery. What if it does not happen?
- ▣ “Imagination is more important than knowledge” – Albert Einstein



What level of analysis is appropriate for smaller banks?

- ▣ The level of analysis should be consistent with the size and complexity of the organization.
- ▣ If the bank has a concentration in CRE, then a higher level of analysis is expected.
- ▣ Banks should have sufficiently granular data to analyze loan level credit metrics, at least for the largest loans.
- ▣ Regional economic conditions will impact how CRE markets react to stress.

Construction Loans

- ▣ The hardest losses to quantify, but also the largest, especially for community banks.
- ▣ Additional problems:
 - Regime shift occurred in demand
 - No ongoing cash flow to structure around
 - Need to determine “highest and best” use
 - Single obligor concentrations
- ▣ The absorption time for these projects could be measured in years and not in months.
 - How much can a bank rely on recourse?

Prudent CRE Workout Guidance

- ▣ Having more foreclosures than necessary is in no one's best interest.
- ▣ A loan should not be adversely classified solely because the value has declined.
- ▣ As long as the property is producing cash flow a sustainable loan can be structured.
 - A / B Notes
 - Needs to include amortization and reasonable DSCR
 - TDR guidelines have not been changed
- ▣ Not “pretend & extend”, but “prudent”.