

Quackenbush & Thomson  
BARRISTERS AND SOLICITORS

SUITE 210  
6021 YOUNG STREET  
HALIFAX, NOVA SCOTIA B3K 2A1  
TELEPHONE (902) 453-0152  
FAX (902) 453-0622

September 4, 1991.

Mr. M.P. Woods,  
City of Halifax,  
P.O. Box 1749,  
Halifax, Nova Scotia,  
B3J 3A5.

Re: Thibeault Property Bedford Highway.

Dear Mr. Woods:

Further to our recent meeting I would like to confirm that the appraised value of \$ 66,500.00 for the 3.5 acres is not acceptable to my client. My client has been attempting to sell the property for a number of years and her experience is that the presence of the park zoning has been a major stumbling block. This has led to the conclusion that the loss of the 3.5 acres would seriously effect the viability of the remaining parcel. Consequently, it is our position that the appraisal must be done in terms of the lost development potential of the entire parcel if the 3.5 acres is taken away.

The obvious difficulty to my client is that she cannot afford the complex appraisal that would be required to counter the Cities appraisal. Hence my client is left with no solution. A situation that I would suggest is inequitable given the fact that the park zoning amounts to expropriation without compensation. Realizing the age and financial status of my client I would hope that a solution could be found for my client. In this regard I would make the following alternative suggestions.

- 1) Buy the entire parcel. If this was done the argument over value would be simplified. My client is attempting to market the entire parcel for \$ 600,000.00. I'm sure this value could be supported by appraisal. This alternative would be advantageous to the City in that it would provide direct access to the park from the Bedford Highway. It would also provide an ideal picnic park area overlooking the Bedford Basin.
- 2) The city fund a development oriented appraisal by an appraiser selected by my client. This would provide a basis for negotiating a purchase price for the rear parcel.