

No. 16-1194

In The
Supreme Court of the United States

—◆—
KINDERACE, LLC,

Petitioner,

v.

CITY OF SAMMAMISH, WASHINGTON,

Respondent.

—◆—
**On Petition For Writ Of Certiorari To
The Washington State Court Of Appeals**

—◆—
**BRIEF IN OPPOSITION TO
PETITION FOR WRIT OF CERTIORARI**

—◆—
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COUNTERSTATEMENT OF QUESTION PRESENTED

Whether a boundary line adjustment – a statutory tool in Washington to make minor changes to existing property lines between two or more contiguous parcels – erases the development history of the underlying real property and creates a new parcel with a new bundle of property rights, including the right to make a second economic use of the real property, even though it was fully developed in an economically viable manner *prior to* the City’s enactment of heightened environmental regulations.

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