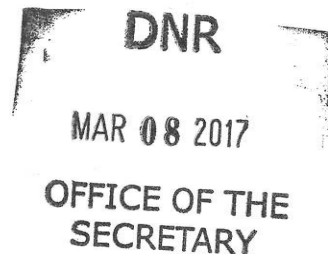


**STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES**

In the matter of a declaratory ruling pursuant to Wis. Stat. § 227.41 concerning the location of the ordinary high water mark on 92 East Maple Street on the west waterfront of the City of Sturgeon Bay for purposes of determining the extent of the State's property interest under Wis. Const. Art. IX, sec. 1 as it pertains to further order of the Circuit Court in *Friend of the Sturgeon Bay Public Waterfront v. City of Sturgeon Bay*, Door County Case No. 16-CV-23



VERIFIED PETITION FOR DECLARATORY RULING

TO: Cathy Stepp, Secretary
Wisconsin Department of Natural Resources
101 South Webster Street
Madison WI 53703

NOW COME Petitioners Friends of the Sturgeon Bay Public Waterfront, Shawn M.

Fairchild, Carri Andersson, Linda Cockburn, Russ Cockburn, Kathleen Finnerty and Christie

Weber, by and through their attorneys, and hereby petition the State of Wisconsin Department of

Natural Resources for a full hearing and declaratory ruling pursuant to Wis. Stat. § 227.41 to

make a finding of the location of the ordinary high water mark ("OHWM") on a parcel of

property located at 92 East Maple Street in the City of Sturgeon Bay ("Parcel 92") as set forth

herein, for purposes of determining the extent of the State's property rights under the Public

Trust Doctrine, Wis. Const., Art. IX, sec. 1.

In the performance of its duties to regulate and protect navigable waters, DNR regularly undertakes to determine the location of the OHWM of navigable lakes and streams, which is the boundary of its navigable waters jurisdiction as well as determinative of its jurisdiction under Wis. Stat. § 30.11(5) to make findings of public interest for filled areas behind a bulkhead line. Petitioners have been advised by Department staff (including testimony under oath of its former Waterway and Wetland Policy Coordinator) that a petition for a declaratory ruling under Wis. Stat. § 227.41 is the appropriate procedure for an interested party to obtain a DNR determination as to the location of an OHWM.

I. APPLICABLE STATUTES AND RULES

Petitioners request a declaratory ruling determining the location of the OHWM on Parcel 92, which will determine the extent of the applicability of the Public Trust Doctrine, Wis. Const., Art. IX, sec.1, and Wis. Stat. ch. 30.

Wis. Const., Art. IX, sec. 1 declares that:

The state shall have concurrent jurisdiction on all rivers and lakes bordering on this state so far as such rivers or lakes shall form a common boundary to the state and any other state or territory now or hereafter to be formed, and bounded by the same; and the river Mississippi and the navigable waters leading into the Mississippi and St. Lawrence, and the carrying places between the same, shall be common highways and forever free, as well to the inhabitants of the state as to the citizens of the United States, without any tax, impost or duty therefor.

Wis. Stat. § 30.10(1) declares all lakes wholly or partly within this state which are navigable in fact to be navigable and public waters and recognizes the rights of all persons therein and thereto.

Wis. Stat. § 30.10(4)(b) declares that the boundaries of lands adjoining waters and the rights of the state and of individuals with respect to all such lands and waters are to be determined in conformity to the common law. Under Wisconsin common law, the boundaries of navigable lakes are bounded by the OHWM.

II. STATEMENT OF FACTS AND REASON FOR THE REQUESTED RULING.

A. Petitioners are Interested Persons Under Wis. Stat. § 227.41(1).

Petitioners are interested persons within the meaning of Wis. Stat. § 227.41(1) because they are the Plaintiffs in the Door County Circuit Court case captioned Friends of the Sturgeon Bay Public Waterfront v. City of Sturgeon Bay, No. 16-CV-23, in which the court entered judgment after trial finding that substantially all of Parcel 92 is formerly submerged lakebed, created by artificial filling by the riparian owners, and is therefore property subject to the public trust doctrine. The Court has enjoined the City from making any conveyance of Parcel 92 to a private party. However, the Judgment provides that the scope of the injunction is subject to modification following a declaratory ruling by the Wisconsin Department of Natural Resources (“DNR”) determining the location of the OHWM for Parcel 92. Such a determination may result in some part of the property being located above the OHWM and owned by the City in a proprietary capacity and that part of the property being released from the scope of the present injunction.

B. Circuit Court Findings of Fact and Law

The Judgment of the Court in Friends of the Sturgeon Bay Public Waterfront v. City of Sturgeon Bay, Door County Case No. 16-CV-23, dated March 8, 2017, setting forth the Court's findings and conclusions of law and the legal description of Parcel 92, is attached hereto and incorporated by reference as EXHIBIT A.

C. Statement of Facts

1. The City obtained title to Parcel 92 in 2012 under a special warranty deed from Freedom Bank, which had in turn purchased the property at a sheriff's sale in a foreclosure action against Fair Oaks Corporation. Fair Oaks Corporation purchased the property in 2007 from its long-term owner, the Door County Cooperative.

2. Parcel 92 is located on the west waterfront of Sturgeon Bay within and northeast of the plat of the Village of Bay View, recorded in the Door County Register of Deeds' office on December 9, 1873, in Book H of Deeds, at Page 409. The recorded plat, which depicts the location of the shoreline at the time of the survey, is attached hereto and incorporated by reference as EXHIBIT B.

3. Joseph Harris platted the Village of Bay View. The chain of title to Parcel 92 evidences that Harris owned lots in Block 8 of the plat of Bay View and constructed a dock extending from Block 8 into Sturgeon Bay, which is shown on historic maps as the "Harris Dock."

4. In 1891, after Harris' death, his son Henry Harris conveyed the property, "together with the steam boat dock and warehouse thereon and extending therefrom into the waters of Sturgeon Bay" to Charles I. Martin. In 1897, A.W. Lawrence, a creditor of Martin,

succeeded to Martin's interest in a foreclosure action and operated a planing mill and built grain warehouses on what was then shown as the "Sawyer Dock" in historic maps.

5. In 1903, the property and dock were sold by Lawrence's son, A.W. Lawrence, Jr., to Arthur Teweles and Isidore Brandeis. The Teweles & Brandeis partnership operated a grain elevator at the end of the dock for decades, and leased areas of the dock closer to the shore for a lumberyard and other businesses. The property was inherited by Brandeis' son, Stanley Brandeis, and his wife Lucile, whose title was quieted in a 1953 action among several claimants including the heirs of Arthur Teweles. Afterwards the property was sold to the Door County Cooperative, which continued to use the grain elevator.

6. Beginning in the 1890s, while owned by Charles Martin, and continuing into the early 1900s under the ownership of Teweles & Brandeis, the dock was successively enlarged and filled underneath.

7. Aerial photographs show that by the 1930s, the dock was a solid, filled rectangular area surrounded on three sides by water, until the approval of a municipal bulkhead line in 1955 and subsequent filling of all of the shoreline behind the steel dock wall constructed at the bulkhead line.

8. The Phase II Environmental Assessment (July 2014), NR 716 Investigation Report-Addendum (June 2015), and Remedial Implementation Work Plan (October 2015) submitted to DNR by the City's engineers, Ayres & Associates, identify ten or more feet of fill overlaying lake deposits under Parcel 92. Soil borings and analysis from earlier environmental site assessments conducted on behalf of the Door County Cooperative reveal similar findings and a conclusion that contamination of the site is associated with urban fill.

D. Request for Declaration of OHWM.

Wisconsin common law establishes that the boundaries of navigable waters and their beds are determined based on the location of the OHWM at the time of statehood. *See Diana Shooting Club v. Husting*, 156 Wis. 261, 145 N.W. 816 (1914); *Illinois Steel Co. v. Bilot*, 109 Wis. 418, 425, 4 N.W. 855 (1901) (“title to the beds of all lakes and ponds, and of rivers navigable in fact as well, up to the line of ordinary high-water mark, within the boundaries of the state, became vested in it at the instant of its admission into the Union, in trust to hold the same so as to preserve to the people forever...”).

As the DNR’s former Wetland and Waterway Policy Coordinator testified, the DNR accepts the location of the shoreline on historic maps as a valid approximation of the location of the OHWM on a filled site, where markers of the continuous presence of water have been obliterated. Attached as EXHIBIT C is a map of Parcel 92 depicting the approximate location of the meander line from the 1835 United States public lands survey, as well as the location of the shoreline of Lake Michigan in the vicinity of Parcel 92 from available subdivision plats recorded nearest to the time of Statehood.

The public trust doctrine applies with equal force to filled lakebeds even if, as a result of the fill, the area is no longer a navigable waterway. *See State v. Trudeau*, 139 Wis. 2d 91, 408 N.W.2d 337 (1987) (“An area need not be navigable to be lakebed. If the land is part of the navigable lake, then the fact that the specific area cannot be navigated is irrelevant to the state's claim.”); *State of Wisconsin v. Public Service Commission*, 275 Wis. 112, 117-19, 81 N.W.2d 71 (1957). Filling of lakebed below the OHWM does not change the character of those formerly submerged lands as constitutionally protected trust property, as was held in *Diedrich v. Northwestern Union R. Co.*, 42 Wis. 248 (1877). In that case, the respondent built an embankment extending 85 feet into Lake Michigan, which the defendant railroad later sought to

condemn for tracks along the water. *Id.* at 261. In ruling on the plaintiff’s takings claim, the *Diedrich* court held that the rights of a riparian owner are based upon his title to the shore, not title to the bed of the adjacent water. Riparian rights at common law include the right to protect shorelands from erosion and to extend docks for access to navigable depths, each subject and subordinate to the public right of navigation. *Id.* at 262. However, the court held:

Without express and competent grant from the public, the rights declared in the foregoing ... are the only rights of a riparian owner, upon navigable water, to extend his possession beyond or intrude within the natural shore of the water. Any other extension or intrusion into the water, beyond the natural shore, whether made by the riparian owner or a stranger, is a pourpresture,¹ vesting no title in him who made it.

Id. at 263.

The *Diedrich* court ruled that the respondent had no title to the filled embankment and thus no claim against the railroad for compensation based on a taking. *Id.* at 272. *See also Menomonee River Lumber Co. v. Seidl*, 149 Wis. 316, 320-321, 135 N.W. 854, 857 (1912) (“One cannot by building up land or erecting structures in a lake, the title to the bed of which is in the state, thereby extend his possession into the lake and acquire the state’s title.”) Wisconsin law thus holds that filling by the riparian does not relocate the OHWM as a boundary between riparian lands and public lakebed.

Evidence from multiple sources—including the title record, historic maps, archived newspaper sources, Door County land office information, and physical evidence from a multitude of environmental site assessments—confirms that substantially all of Parcel 92 is situated on the filled bed of Sturgeon Bay. These are all sources of evidence DNR routinely relies on when making OHWM determinations on filled sites.

¹ “Pourpresture” (also spelled “purpresture”) is a term from English law meaning an encroachment on property of the crown constituting a nuisance. *See* <http://thelawdictionary.org/pourpresture/> (last visited 10/06/16).

As DNR recognizes, artificial filling or other actions which deliberately create dry land from submerged lakebed do not change the boundary of lands held in the public trust. The rule against title vesting in the riparian is the same whether the fill is illegal or approved under a municipal bulkhead ordinance. Accordingly, in its letter entitled “Determination of Concurrence with the Approximate Ordinary High Water Mark for the City of Sturgeon Bay West Side Waterfront Project,” recorded October 28, 2014, in connection with the adjacent parcel at 100 East Maple Street (“Parcel 100”), DNR declined to find that the OHWM had shifted waterward to the municipal bulkhead line approved in 1955. Section 30.11, Stats., the bulkhead statute, authorizes riparian owners to place solid structures or fill up to a designated bulkhead line, which is to “conform as nearly as practicable to the existing shores,” except that: “in the case of leases under sub. (5) and s. 24.39(4) bulkhead lines may be approved further from the existing shoreline if they are consistent with and part of any lease executed by the board of commissioners of public lands.” Wis. Stat. § 30.11(2). Under these statutes, the riparian owner does not take title to lands between the OHWM and the bulkhead line. The establishment of a bulkhead line under sec. 30.11 does not grant full title to the bed landward of the line, but only grants a limited right of use of the bed for the placing of fill up to the bulkhead line.

III. PARTIES OTHER THAN PETITIONERS UPON WHOM THE DECLARATORY RULING SHALL BE BINDING

CITY OF STURGEON BAY
a Wisconsin municipal corporation,
421 Michigan Street
Sturgeon Bay, Wisconsin 54235

WATERFRONT REDEVELOPMENT AUTHORITY
OF THE CITY OF STURGEON BAY
a municipal redevelopment authority,
421 Michigan Street
Sturgeon Bay, Wisconsin 54235

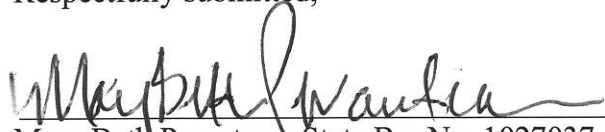
IV. RELIEF REQUESTED

Petitioners hereby request that the Department of Natural Resources hold a hearing and issue a declaratory ruling establishing the OHWM on Parcel 92.

Dated at Madison, Wisconsin, this 8th day of March, 2017.

Respectfully submitted,

By:


Mary Beth Peranteau, State Bar No. 1027037
WHEELER, VAN SICKLE & ANDERSON, S.C.
44 East Mifflin Street, Suite 1000
Madison, Wisconsin 53703
(608) 255-7277
(608) 255-6006 fax

Sarah Geers, State Bar No. 1066948
MIDWEST ENVIRONMENTAL ADVOCATES
612 West Main Street
Madison, Wisconsin 53703
(608) 251-5047
(608) 268-0205 fax

Attorneys for Petitioners

[PETITIONER'S VERIFIED SIGNATURE APPEARS ON THE FOLLOWING PAGE]

VERIFICATION

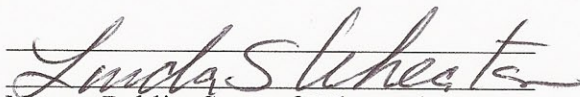
STATE OF WISCONSIN }
 }
COUNTY OF DOOR } SS.

The undersigned Shawn M. Fairchild hereby attests he is one of the petitioners in the above matter, and is a member of the Friends of the Sturgeon Bay Public Waterfront, an unincorporated association, and that the allegations set forth in this Verified Petition under Wis. Stat. §227.41 are true and correct to the best of his knowledge and belief.



Shawn M. Fairchild

Subscribed and sworn to me this
8 day of March, 2017



Notary Public, State of Wisconsin

My commission expires: June 17, 2018



FRIENDS OF THE STURGEON
BAY PUBLIC WATERFRONT,
SHAWN M. FAIRCHILD,
CARRI ANDERSSON,
LINDA COCKBURN,
RUSS COCKBURN,
KATHLEEN FINNERTY,
and
CHRISTIE WEBER,

Case No. 16-CV-23
Code: 30701

Plaintiffs,

vs.

CITY OF STURGEON BAY,
a Wisconsin municipal corporation,
and
WATERFRONT REDEVELOPMENT AUTHORITY
OF THE CITY OF STURGEON BAY
a municipal redevelopment authority,

Defendants.

JUDGMENT

This matter having come for trial on February 9 and 10, 2017, before the Door County Circuit Court, the Honorable Raymond S. Huber presiding without a jury, and there having been appearances by Attorneys Mary Beth Peranteau of Wheeler, Van Sickle & Anderson, S.C., and Sarah Geers of Midwest Environmental Advocates on behalf of the Plaintiffs, and by Attorneys Remzy Bitar and R. Valjon Anderson of Arenz, Molter, Macy, Riffle & Larson SC on behalf of the Defendants;

NOW, THEREFORE, upon the evidence admitted a trial, the briefs and arguments of the parties and the file and record herein, the Court hereby finds as follows:

Exhibit A

- 03/06/2017 WED 10:19 FAX 000 155 0000 WABBER SH 1140 0000000
1. Defendants claim title to a parcel of real property located at 92 East Maple Street in the City of Sturgeon Bay ("Parcel 92"), more particularly described as:

Being a part of Lot One (1), Block Nine (9), according to the recorded Plat of Harris First Addition and also a part of Lots One (1), Six (6) and Seven (7), Block Eight (8) of Bay View Plat, and all of Lots Two (2), Three (3), Four (4) and Five (5), Block Eight (8), of Bayview Plat, and part of Subdivision 76, all in the Northeast Quarter (NE 1/4), Section Seven (7), Township Twenty-seven (27) North, Range Twenty-six (26) East, in the City of Sturgeon Bay, Door County, Wisconsin, described as follows:

Commencing at the intersection point of the East line of Neenah Avenue and the North line of Maple Street; thence North 89 deg. 59 min. 38 sec. West, 91.92 feet along the North line of Maple Street to the point of beginning of lands to be described; thence North 13 deg. 34 min 55 sec. East, 47.11 feet; thence North 33 deg. 52 min. 22 sec. East, 263.80 feet; thence North 47 deg. 16 min. 59 sec. West, 200.38 feet; thence South 42 deg. 16 min. 00 sec. West, 229.08 feet; thence South 40 deg. 01 min. 00 sec. West, 33.71 feet; thence South 32 deg. 53 min. 44 sec. West, 33.77 feet; thence West 92.01 feet; thence South 06 deg. 01 min. 06 sec. East, 178.01 feet to the North line of Maple Street; thence South 89 deg. 59 min. 38 sec. East, 256.57 feet along said North line to the point of beginning.

Property Address: 92 E. Maple Street Sturgeon Bay, WI 54235

Tax Parcel Number: 281-12-10080101

2. Parcel 92 is basically the remnants of a dock and operating system started by prior riparian owners who extended the dock and filled beneath it.
3. Parcel 92 is largely or wholly owned by the State in trust for the benefit of the public under the public trust doctrine, Wis. Const., Art. IX, sec. 1, and may not be conveyed to a private party. In the course of this litigation, neither party has shown the Court where the ordinary high water mark will be, there may be some portion of Parcel 92 which may be above the ordinary high water mark.
4. The Wisconsin Department of Natural Resources has not made an Ordinary High Water Mark ("OHWM") determination on Parcel 92.
5. Subject to the findings in paragraphs 2 and 3 above, the Court is unable to make a determination of the location of the OHWM on Parcel 92. Absent some determination, at some point in time, by the Wisconsin Department of Natural Resources as to where the actual ordinary high water mark is, of which there is insufficient evidence in this action, Parcel 92 cannot be sold.

6. Defendants claim title to a parcel of real property located at 100 East Maple Street in the City of Sturgeon Bay formerly known as Tax Parcel No. 281-2415090101, consisting of parts of Document Nos. 318850 and 783268, excepting part of Document No. 580907 ("Parcel 100"). A portion of Parcel 100 is more particularly described as:

A parcel of land located in the NE 1/4 of Section 7, T. 27 N., R. 26 E., City of Sturgeon Bay, Door County, Wisconsin, bounded and described as follows:

Commencing at the intersection point of the east line of Neenah Avenue and the north line of Maple Street, thence N. 89°59'38" W., 91.60 feet along the north line of Maple Street to the point of beginning of lands to be described; thence N85°03'44"E -- 49.68 feet; thence N69°31'57"E -- 80.99 feet; thence N46°00'22"E -- 64.41 feet to the approximate ordinary high water mark of Sturgeon Bay as determined by the Wisconsin Department of Natural Resources; thence along said ordinary high water mark as follows: N69°57'18"W -- 16.60 feet; thence N54°01'08"W -- 52.88 feet; thence N46°47'03"W -- 11.34 feet; thence N37°59'31"W -- 5.05 feet; thence N24°15'51"W -- 7.57 feet; thence N01°14'01"W 11.87 feet; thence N11°54'30"E -- 14.79 feet; thence N19°09'16"E -- 35.48 feet; thence N27°35'00"E -- 30.30 feet; thence leaving said ordinary high water mark S33°52'22"W -- 209.15 feet; thence S13°34'55"W -- 47.11 feet to the aforementioned north line of Maple Street; thence S89°59'38"E -- 0.32 feet along said north line to the point of beginning.

7. The Wisconsin Department of Natural Resources issued a WDNR Concurrence With Approximate Location of the Ordinary High Water Mark for the City of Sturgeon Bay West Side Waterfront Project, recorded in the office of the Door County Register of Deeds on October 28, 2014, as Document No. 782928 (the "Concurrence"), which concurs in the location of the OHWM for Parcel 100.
8. The portion of Parcel 100 lying landward of the OHWM as found in the Concurrence, more particularly described in paragraph 6 above, is owned by the City of Sturgeon Bay.
9. The portion of Parcel 100 lying waterward of the OHWM, as found in the Concurrence, is owned by the State in trust for the benefit of the public under the public trust doctrine, Wis. Const., Art. IX, sec. 1, and may not be conveyed to a private party.

Based on the foregoing, **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that:

1. Defendants are permanently enjoined from conveying Parcel 92 to a private party and from using Parcel 92 in a manner that is inconsistent with public or navigation-related uses as provided by Wisconsin statute and case law under the public trust doctrine, Wis. Const., Art. IX, sec. 1. This paragraph is subject to modification upon application to this

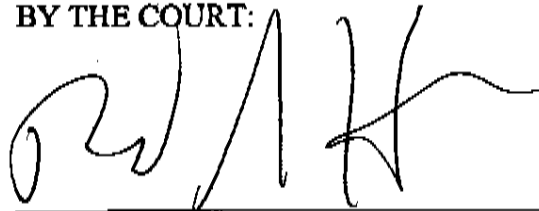
Court following a declaratory ruling by the Wisconsin Department of Natural Resources determining the OHWM for Parcel 92.

2. Defendants are permanently enjoined from conveying that portion of Parcel 100 lying waterward of the OHWM set forth in the WDNR Concurrence to a private party and from using said property in a manner that is inconsistent with public or navigation-related uses as provided by Wisconsin statute and case law under the public trust doctrine, Wis. Const., Art. IX, sec. 1.

This is a final judgment for purposes of appeal.

Dated this 8th day of March, 2017.

BY THE COURT:



Honorable Raymond S. Huber
Circuit Judge

This document drafted by:
Attorney Mary Beth Peranteau, SBN 1027037
Wheeler, Van Sickle & Anderson, S.C.
44 East Mifflin Street, Suite 1000
Madison, WI 53703
(608) 255-7277
(608) 255-6006 (fax)
mperanteau@wheelerlaw.com

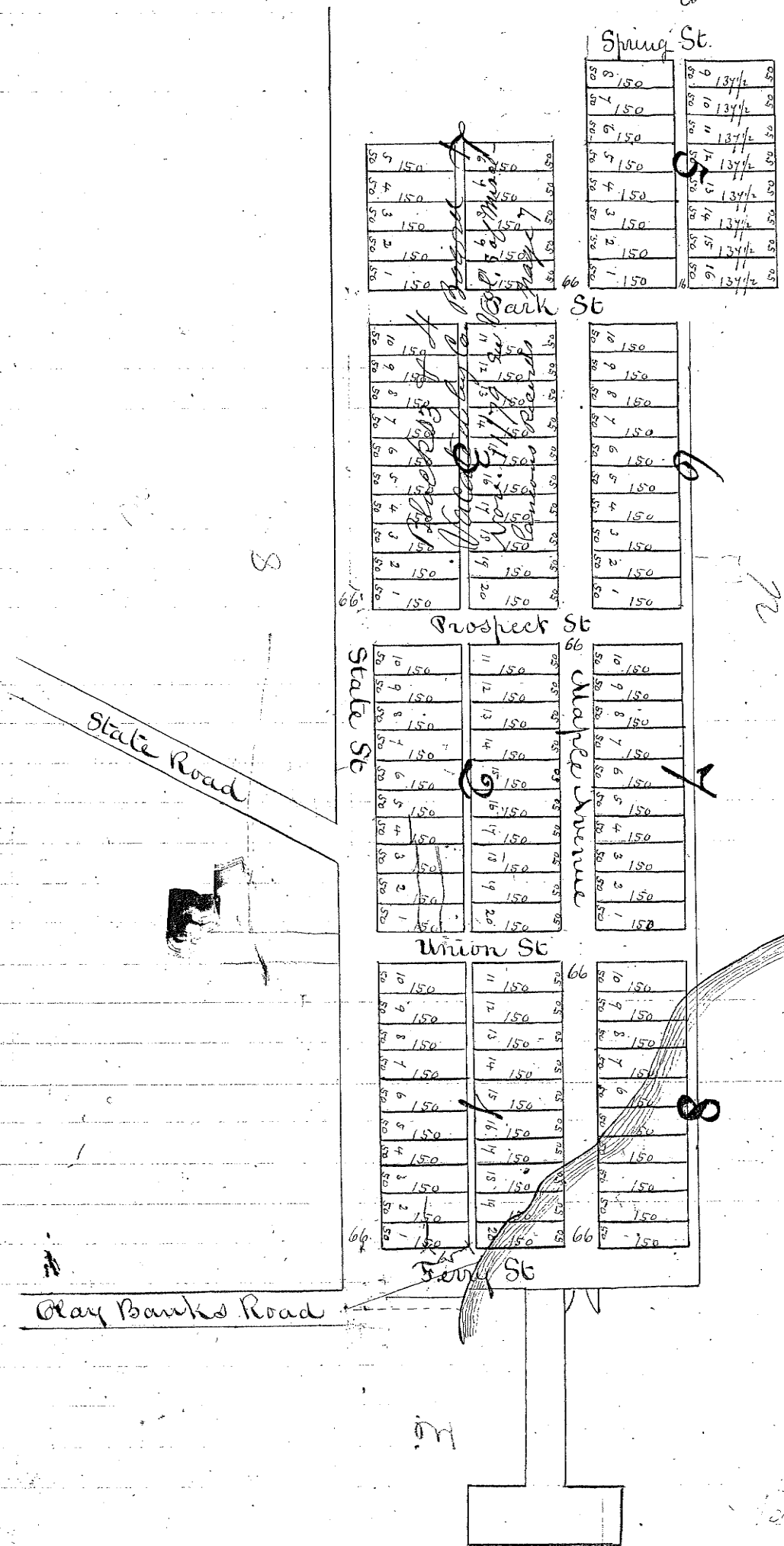
Village of Bay View

Sturgeon Bay

Door County

W

Wisconsin



Recorded Sept 9, 1874
 at Co. Clerk's Office
 Peter Zimmerman, register
 by John Galland, Deput

Village of Bay View

Sturgeon Bay Door County Wisconsin

Joseph Harris Sr. Proprietor

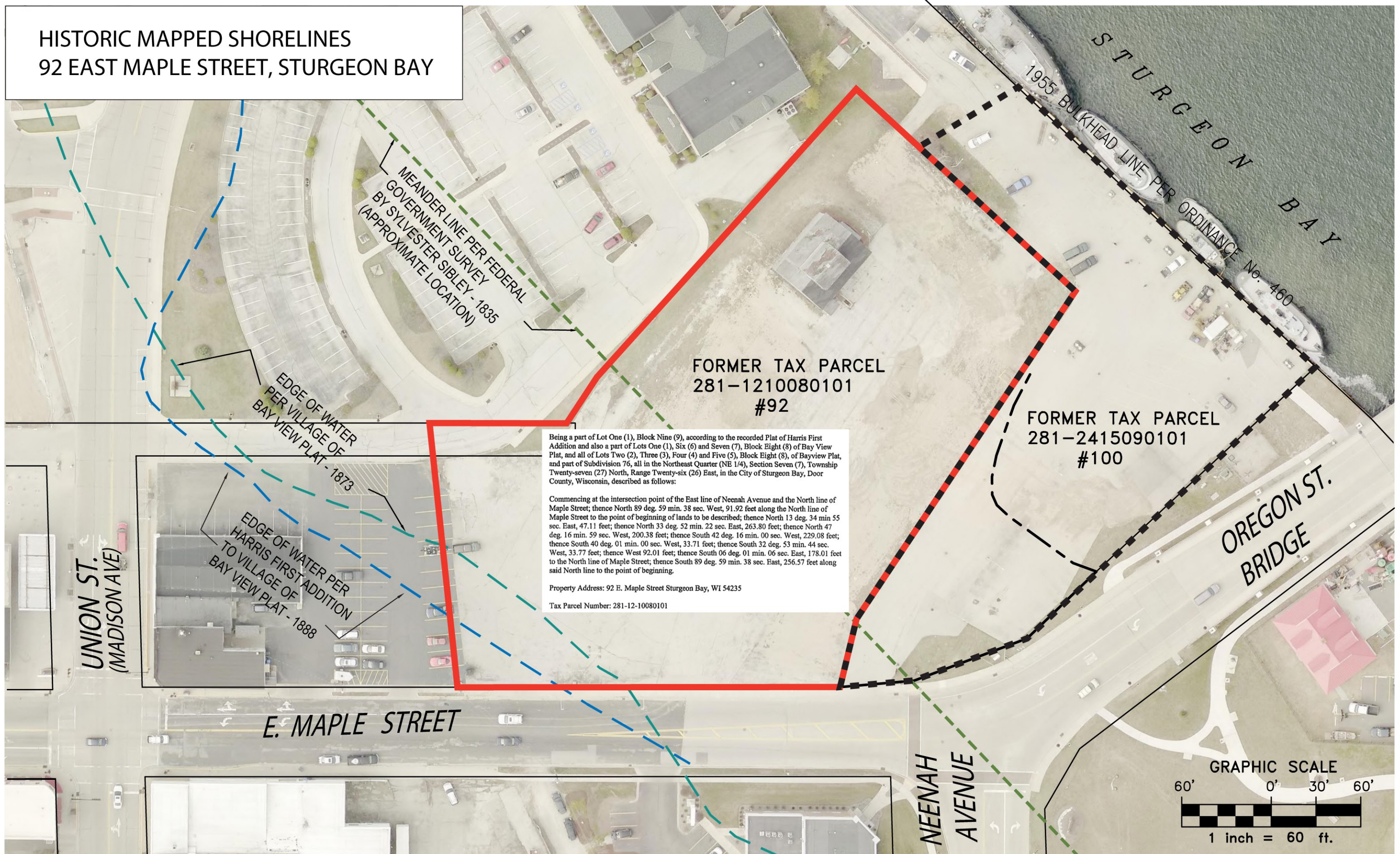
State of Wisconsin }
County of Door } ss A. D. 1873 with John Darling and Joseph Harris Sr. as assistants
did lay out a part of lots 2 and 3 in Section 7 Town 27
Range 26 East, Commencing NE corner of the NW 1/4 of the SE 1/4 of said
Section 7: run North 33 feet for 1/2 of State Street and West 60 feet
for Perry Street, thence West setting stakes every 50 feet for corners
of lots 500 feet for Block 1 thence 60 feet for Union Street, thence
same as above 500 feet for Block 2, thence 60 feet for Prospect
Street, thence same as 500 feet for Block 3, thence 60 feet for
Park Street, thence same as above 250 feet for Block 4, thence
North 150 feet for lot, thence 16 feet for Alley, thence 150 feet
for lot, thence 66 feet for Maple Avenue, Northern bound-
ary of aforesaid Blocks 1. 2. 3. 4, and Southern boundary
of lots 5. 6. 7. 8, all lots are 50 feet East and West by 150 feet
North and South, each full Block contains 20 lots, all lots
from 1 to 10 inclusive are numbered on the Stake at SE cor-
ner, and all lots from 11 to 20 inclusive are numbered on
the Stake on the NW corner, lots in Block 5 from 9 to 16
inclusive are 50 feet by 13 1/2 feet, lots 19 and 20 in Block
1 are 50 feet by 13 1/2 feet, lots 6. 7. 8. 9. 10 in Block 3 are fractional on line
of Sturgeon Bay, Blocks 6. 7. 8 contain one tier of lots
and numbered respectively from 1 to 10, Block 5
contains 16 lots, and Block 4 contains 10 lots, attached
herewith is a correct Plat.

J. C. Quincy
County Surveyor
Door Co

Whereas Joseph Harris Sr. of the town of Sturgeon Bay in the county of Door and State
of Wisconsin did on the 8 & 9th days of August 1873 cause to be surveyed and laid out by
James B. Binney then the County Surveyor of this county a certain plat of the Village of Bay
View in said town, the said Village Plat being upon a part of lots 2 & 3 in Section 7 Town 27 Range
26 East and the same being recorded on the 9th day of September 1873 in Vol. H. of Deeds on pages
408 & 409 by the Register of Deeds of said county. And whereas the said Joseph Harris Sr. did at
the time of laying out and platting said Village neglect to acknowledge the same before
an officer duly authorized to receive and execute the same. Therefore he it is remembered
that on this 15th day of May 1878 personally appeared before me the above named Joseph
Harris Sr. to me known as the proprietor and owner of the Village of Bay View
aforesaid and acknowledged the aforesaid plat for the uses and purposes therein mentioned.
J. C. Dreutzer N. B. Court Commissioner Joseph Harris Sr.
Eastern District of Wisconsin

STATE OF WISCONSIN
COUNTY OF DOOR
I, Carey Petersilka, Register of Deeds in and for said
county do hereby certify that this is a true and correct
copy of the original record on file in the Door County
Register of Deeds Office, Door County, Wisconsin.
Witness my hand and official seal the 1st
day of February A. D. 2011
May 6 2011
Register of Deeds, Deputy

HISTORIC MAPPED SHORELINES
92 EAST MAPLE STREET, STURGEON BAY



Being a part of Lot One (1), Block Nine (9), according to the recorded Plat of Harris First Addition and also a part of Lots One (1), Six (6) and Seven (7), Block Eight (8) of Bay View Plat, and all of Lots Two (2), Three (3), Four (4) and Five (5), Block Eight (8), of Bayview Plat, and part of Subdivision 76, all in the Northeast Quarter (NE 1/4), Section Seven (7), Township Twenty-seven (27) North, Range Twenty-six (26) East, in the City of Sturgeon Bay, Door County, Wisconsin, described as follows:

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Property Address: 92 E. Maple Street Sturgeon Bay, WI 54235
Tax Parcel Number: 281-12-10080101

