

the said river to the Brulé river; thence up said last-mentioned river to Lake Brulé; thence along the southern shore of Lake Brulé in a direct line to the center of the channel between Middle and South islands, in the Lake of the Desert; thence in a direct line to the headwaters of the Montreal river, as marked upon the survey made by Captain Cram; thence down the main channel of the Montreal river to the middle of Lake Superior; thence," etc.

This description, which is the existing one, while it embodies some of the suggestions made by Captain Cram, is nevertheless faulty in several particulars — it fails to specify which channels of the Menomonee, Brulé and Montreal rivers are the ones intended, for there are more than one in each river; in all three streams there are numerous islands: in the Menomonee alone there being, Captain Cram reports, three hundred and eighteen, "of which some are over one mile in length and from one-eighth to one-fourth of a mile in breadth, and covered with excellent pine." Questions of state jurisdiction over these islands might readily occur, in cases of crime or tax disputes, when the country becomes thickly settled. Then again, the "southern shore of Lake Brulé" is indefinite, and leaves it in doubt whether Michigan has jurisdiction over the entire lake to the line of high-water on the southern beach, or whether Wisconsin might not claim, at least, a narrow strip of water along the shore. "Through Green bay" is ambiguous, but probably the courts would construe it as meaning through the geographical center of the bay. Captain Cram's proposed detail description would have equitably divided the islands between the states and left no room for future legal wrangling over the intent of the act.¹

¹The Michigan constitution, while aiming to be more explicit, yet is sufficiently ambiguous, on account of the specification of the "main channel" in the rivers named, and of the "most usual ship channel of the Green bay." The Michigan description is as follows: "Thence [from a point where the international boundary last touches Lake Superior] in a direct line through Lake Superior to the mouth of the Montreal river; thence through the middle of the main channel of the said river Montreal to the headwaters thereof; thence in a direct line to the center of the