



**Department of Fish and Wildlife**

Natural Heritage Inventory  
5 Perry Street, Suite 40  
Barre, VT. 05641

11 Feb 2022

Dear Scott:

I am contacting you in regard to the proposed acquisition of a portion of the Elk's Lodge property by a private entity. While I am sure that you are aware of the recreational and educational value of the parcel to the City, I would like to emphasize its ecological value.

The parcel contains one of the largest and least disturbed Lake Sand Beach examples in the state in addition to a number of rare and/or state threatened plants. The state threatened plants include the following:

- marsh horsetail (*Equisetum palustre*)
- beach pea (*Lathyrus japonicus* var. *maritimus*)
- Muhlenberg's sedge (*Carex muehlenbergii*)

In addition the following rare, but not legally listed plants are known from the site:

- Wright's spike-rush (*Eleocharis diandra*) a globally rare for which this is one of the largest populations
- water hemp (*Amaranthus tuberculatus*) a plant that is rare throughout New England
- red-root flat-sedge (*Cyperus erythrorhizos*)
- Smith's bulrush (*Schoenoplectiella smithii*)

Regardless of the outcome of this proposed land change, we urge you and the board to consider the value of the rare plants and significant natural community at the site. Any future management by any party would need to avoid any impact to the legally protected, state listed species on the site.

Please let me know if I can provide any further information.

Sincerely,

Robert Popp  
Program Botanist  
(802) 476-0127