

## **Mendham Township Environmental Commission**

### **Comments on the Mendham Mushrooms proposal August 25, 2022**

The Environmental Commission (EC) held a special meeting on August 23<sup>rd</sup>, despite the summer break period, specifically to review information relating to the proposal 'Mendham Mushrooms', in view of urgency to provide an EC view to help inform a Mendham Township Committee (TC) public meeting on this proposal to be held August 30<sup>th</sup>.

This position paper is the outcome of the EC special meeting and outlines the views of the EC members, which were unanimously agreed, without exception.

The 'Mendham Mushrooms' proposal was submitted to the TC, with a view to securing support to use Township land to conduct long-term studies on forestry conservation, including commercial production of mushrooms as a profit-sharing venture.

Bruce Flitcroft, the proposer, shared topline details of his proposal as a public attendee at the EC monthly meeting on June 25<sup>th</sup>. The idea sounded interesting to EC members to look into further. The basic proposition is to promote hardwood forests, remove invasive plants, and to encourage growth of fungi, claimed to represent typical woodlands from hundreds of years ago. However, upon reading further details of the proposal subsequently shared by Mr. Flitcroft, significant concerns were raised, and doubts about the legality, feasibility and scientific credibility of the proposal.

At a very basic level, no evidence was presented that would support that open space land owned by Mendham Township has a problem that requires the remedy proposed, and the proposal lacks specificity around execution of the plan, financial benefits and impact to the community.

After reviewing material submitted to the EC by Mr. Flitcroft, the following issues were identified as concerns of the EC:

1. Before considering the technical details and merits of the proposal, the EC has fundamental questions on the legality of what is proposed. The proposal to use large areas of Township land for commercial gain by an individual entrepreneur, whether such work is permitted on the protected open space and designated Green Acre areas, and the adjacency to sensitive protected category 1 waterways, needs review by legal and environmental professionals.
2. There are several New Jersey organizations that should be consulted about permissibility and environmental risks of this project, such as:

- +The New Jersey Highlands Coalition
- +The New Jersey Land Conservancy
- +Raritan Headwaters
- +New Jersey Dept. of Environmental Protection
- +New Jersey Conservation Foundation
- +Morris County

Without advance reviews on legality and permissibility on protected land, it would be inappropriate use of TC and EC time to pursue considering this proposal.

3. A legal view is needed on the potential conflict of interest in view of Mr. Flitcroft being an active member of the Mendham Township Finance Committee.
4. The proposal itself lacks any clear business plan. There is no clarity on how Mendham Township would benefit from this project. The benefits should be clearly stated along with the risks, cost breakdown, project partnership accountabilities, etc. How would the project benefits compare with alternative conservation projects that may offer greater benefits for Mendham open space and woodlands?
5. Mr. Flitcroft's plan is for a project to last 10 years. Such a lengthy term project should require a much more detailed plan with executive summary listing the following and more:
  - + Goals and fact-based benefits for Mendham Township and Mendham Mushrooms,
  - + Timetable,
  - + Overall cost, and cost for the Town to absorb,
  - + Work Schedule and who will do the work to implement and maintain the project
  - + Most importantly, the risks for this experimental research work and how they will be mitigated, to ensure no detriment to our local environment.
6. Much of the material is from Mr. Flitcroft, as an individual. Mr. Flitcroft's experience is primarily in IT and entrepreneurial business. He has not provided any clear documented evidence or references for his relevant experience or research, or scientific partners, or technical collaborators who are experts on relevant environmental issues, or scientific research. There is no apparent partnership or agreement with expert organizations in this area of conservation. Other material submitted is US Federal Government material and is not specific to the issue of mushrooms as put forward by Mr. Flitcroft.
7. Mr. Flitcroft describes the project as a 'research' project but gives no indications of possible risks or problems with the suggested approach. Mendham will not know if this experimental idea poses risks of damaging our environment. The US government references are mostly concerned with large tracts of land (1,000+ acres or more) not in the Northeastern US and with the intent of limiting forest fires, which is not representative of Mendham.

8. This project would remove the use and access for residents to preserved open space land, while enabling a mushroom business for an entrepreneur, who has no documented established connections with credible environmental academic researchers or scientific expert partners or collaborators in relevant forestry conservation. While the proposal includes planting hardwood trees and removing invasive plants, the primary driver of the proposal is 'Mendham Mushrooms' business, inoculating Mendham woodlands with fungi, that may or may not provide any conservation benefits.
9. Mendham Township has approximately 11,500 total acres, of which 3,848 acres are open space, as indicated in the Township Masterplan. Mr. Flitcroft is suggesting setting aside 100 acres of Mendham preserved open space land for this project. To help frame this, the Schiff Preserve totals 380 acres. Mr. Flitcroft is proposing to take control of Township open space land that is equivalent in size to over 26% of the entire Schiff Preserve, to fence off this land from public recreational use and deprive enjoyment by Mendham residents.
10. A major concern is that the proposal would damage existing ecosystems, without sufficient knowledge of those existing ecosystems, or the potential negative impacts of introducing new fungal species that may not be currently compatible. A properly conducted expert ecological and ecosystem review would be necessary, to determine risks and possible benefits, and whether there is any need for fungal inoculation in our otherwise healthy woodlands.
11. The Government documents indicate the need for a Forest Management Plan and a Forest Management Professional for the work (666D). Mr. Flitcroft's paper says there is a need for long term custodial model, but no details are offered on who will do this work or how it would be funded.
12. This project has an aggressive schedule to meet submission dates for a government grant. Such Government grants are offered annually. There is no reason to force agreement to move forward with a project proposal which has so many fundamental flaws, uncertainties and potential risks. The schedule should not unduly pressure MT or the EC. Both organizations have work schedules that have been set well in advance of any specific project schedule. There is no reason for an interruption without more information, such as details elaborated above. Ad hoc long-term study ideas from individuals are no basis for urgency, and should undergo appropriate scrutiny and review for justification, before taking significant amounts of time from elected officials and volunteers serving in their best interests for our community.

The EC strongly suggests that if this project proposal is elaborated with information to support the concerns above, that further review would be necessary by independent experts in forestry conservation, ecology and ecosystems. Independent assessments would be necessary on the risks, potential benefits, costs, timetable and work schedule, at the cost of the proposer as part

of the due diligence that would be expected in such a project proposal. The government documents indicate that some work has been done to improve forestry areas, but there is nothing obvious demonstrated about inoculating with mushrooms. There is no mention of how these other projects are progressing and if it is possible to learn from them to benefit the current proposal. Only with a significantly more robust proposal and appropriate expert analysis, would the Township be able to make an educated, informed decision about whether such project-work might make any sense for our local Mendham environment.

The proposed project appears to be essentially a commercial venture, based on theory, with limited technical field knowledge on how it would impact our environment, or clear benefits to our community. We would recommend an alternative reasonable way forward may be a pilot conducted by the owner, if desired, on private land, meeting environmental protections, and studied over a trial period to understand the pros and cons in practice, before any further proposals are put forward to use Township land.

A positive outcome arising from this proposal is the raised attention to conservation efforts in our Township, and while this proposal in its present form does not fit our community needs, the EC proposes to assist the TC in developing a conservation strategy for long-term management of its open spaces, woodlands and protected waterways. For example, programs for removing invasive plants that can choke and outcompete native plants, promoting growth of native beneficial trees and shrubs would make sense - a strategy to promote healthy, naturally-sustainable ecosystems, without forced interventions, without inoculation of commercial species that otherwise may be detrimental to our largely healthy woodlands. If native plants provide an ecosystem that supports growth of desirable fungi, then nature will lead the way. This is in line with EC efforts already underway to promote native planting, remove invasive plants and reduce unnatural interventions, such as detrimental chemicals and treatments.

Submitted on behalf of the Mendham Township Environmental Commission

by

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Chair, Mendham Township Environmental Commission

August 25, 2022