



LEGISLATIVE ASSEMBLY
of BRITISH COLUMBIA



January 3, 2023

By email

Hon. Bruce Ralston
Minister of Forests
Room 138, Parliament Building
Victoria, BC V8V 2L8

Hon. Nathan Cullen
Minister of Water, Lands & Resource Stewardship
Room 027, Parliament Building
Victoria, BC V8V 2L8

Josh Pressey
Regional Executive Director
Ministry of Forests, Caribou Forest District
322 Johnston Avenue
Quesnel BC Canada V2J 3M5

Dear Ministers and Mr. Pressey,

Re: **Horsefly River Fisheries Sensitive Watershed Designation FR-5-001**

I am writing as a follow up to the letters sent to you by the Horsefly River Watershed Roundtable (HRWR) dated April 30th and December 4th, 2023, regarding the Fisheries Sensitive Watershed designation FR-5-001 given to the Horsefly River watershed in June 2018. My communication with Brian Englund, President of HRWR indicates that he has yet to receive a response from yourself as the addressee, or anyone of the many government officials who were provided copies in the original distribution. I am concerned that the lack of response may be reflective that government does not consider forest hydrology a significant threat to our communities, fisheries, and ecological balance of our watersheds.

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From reading the Forest Practices Board special report *SR56-Fish Habitat Conservation* from July 2018, I understand the process to designate FR-5-001 as a FSW began nearly 20 years earlier but was stalled because industry relied upon the clause within regulations that the designation would lead to “unduly reducing the supply of timber from British Columbia forests”. Since the designation order took effect in June of 2018, the licensees were to amend their forest stewardship plans to comply with the policy on Equivalent Clearcut Area or ECA as per FLNRO directive Extension Note 118. The ECA for fisheries sensitive watersheds is 25%, which means that at any given time, a maximum of 25% of the entire watershed may be clearcut. Logged areas are considered 90% recovered when the newly planted trees reach a height that would be 65% of the height of the original forests. In this watershed, that would take 60 or more years to reach. My cursory review of the designated FSW area (google earth engine timelapse) indicates that the ECA had already surpassed the 25% at the time the process commenced in the early 2000’s. Today, as the red area indicates, most of the watershed is unrecovered cumulative clearcut, and far exceeds the ECA as described in extension note 118.



Horsefly River FR-5-001 FSW Area

Figure 1

Several studies by UBC forest hydrology researchers and others over the past 20 years have identified 3 key factors on the loss of forest canopy due to clearcut logging, namely:

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1. Forest harvesting increases the magnitude and frequency of snowmelt floods
2. Harvesting effects on frequency and magnitude increase with flood size
3. Basin characteristics of aspect, gradient and elevation affect flood response

Some of these studies were cited in *FBC/IRC/201 Forest Harvesting and Streamflows in the Bonneau Creek Watershed*, and the applicability of the recommendations from that report, should have provided guidance in respect to the Horsefly River watershed. These studies also demonstrate the weaknesses in the ECA policies described in extension note 118, in that it takes much longer for a recovering clearcut to be excluded from the ECA calculations.

I understand there have been a number of confidential hydrological reports commissioned by government over the past several years that supports this. I also understand there are several court challenges involving government and industry over the damages from floods caused by clearcut forest practices. Flooding has led to loss of life and billions of dollars in structural flood damage. There are also linkages to these practices drying out our watersheds and thus increasing the wildfire risks. The latest study was published a week ago, but references studies that have taken place over the past several decades [Science of Forests and Floods 2023](#)

I am hoping you would deem it to be appropriate for yourself or some senior government official, to explain how a designated area authorized under the Government Action Regulations, has been allowed to deteriorate with such vast cumulative clearcuts that far exceed acceptable levels of ECA, jeopardizing public safety and critical fish and wildlife habitat.

Yours sincerely



Mike Morris
MLA Prince George-Mackenzie