

January 15, 2026

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**Ontario Ministry of Natural Resources**  
Forest Policy Division – Stand and Site Guide Review

**Subject:** Concerns Regarding Proposed Poplar/White Birch Wildlife Tree Density Guidelines

Dear Sir or Madam,

As a resident of Kenora and a Registered Professional Forester, I am writing to express my concerns regarding the proposed changes to the Ontario *Stand and Site Guide*, specifically the recommended wildlife tree density of 100–150 living poplar and white birch trees per hectare. While I recognize the intent to address concerns in areas where there is no hardwood market, I believe the current proposal may have unintended negative consequences for Northwestern Ontario's forestry sector and local communities.

The Timberstrand mill in Kenora consumes approximately 600,000 m<sup>3</sup> of poplar and white birch annually. This facility supports over 400 families in Kenora and the surrounding area. Implementing the proposed density guideline would reduce access to merchantable fibre, creating silvicultural challenges and threatening the economic viability of the mill. The resulting impact would extend to the livelihoods of hundreds of families who depend on these operations.

The OSB mill in Barwick also uses poplar and white birch, supports hundreds of families, and would experience negative effects if the proposed changes to wildlife tree densities are implemented.

While there may be areas in Ontario where poplar and white birch are unmarketable, Northwestern Ontario maintains strong markets for these species. Applying a uniform provincial guideline does not account for these regional differences. Solutions to market-absent situations should be addressed at the regional or district level, allowing for targeted hardwood or conifer strategies that reflect local realities.

To ensure the guideline achieves its intended purpose without causing undue harm, I respectfully recommend the following:

- Remove the hardwood wildlife tree recommendation and allow hardwood and conifer strategies to be managed at the regional and district level.
- If the above recommendation is intolerable, restrict the application of the 100–150 trees per hectare guideline to regions where there is no viable market for poplar and white birch.
  - Clearly state in the Stand and Site Guide that this recommendation should only be implemented in market-absent situations and require approval from affected mills before applying the guideline.
  - Include a maximum conifer wildlife tree density to address conifer-absent markets. Particularly in regions like Northwestern Ontario where market conditions have changed due to mill closures, such as the Ear Falls and Ignace sawmills.



In summary, while the proposed guideline addresses a legitimate concern in areas lacking markets for hardwood, its current wording risks unintended application in regions where strong markets exist. I urge the Ministry to refine the guidelines to ensure it is applied appropriately and does not jeopardize the sustainability of local forestry operations and communities.

Thank you for considering these comments. I would welcome the opportunity to discuss practical implementation options and share local operational experience to help refine the final wording.

Sincerely,

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