

3. It is detrimental to tree structure. It causes weak, new limbs to form by forcing growth into poorly developed auxiliary buds. If cuts are made in the internodal area, dieback to the previous node is more likely and it complicates the matter of weak-limb formation.
4. Large stubs of topped trees are not likely to heal in a reasonable period. The terminal location of the cuts, as well as the large diameter, generally prevents the tree's natural defense system from deterring pests. Remaining stubs are highly vulnerable to insect and disease invasion.
5. The intended goal of topping is to lower the height of the tree and reduce unwanted growth. However, topping is counterproductive to that goal. In fact the opposite effect will be achieved. Resulting sprouts are far more numerous than the normal new tree growth and they elongate so rapidly that the tree soon returns to its original height with a far denser crown.

**P. Chemical Application Regulations (See Integrated Pest Management Program)**

The following regulations pertain to the application of fertilizers or pesticides in either aerosol or granular form to the above ground portions of park and City Trees or over the root zone of these trees. (Note that on June 14, 2012, the City Council voted to concur with a recommendation from the Parks and Recreation Board (the Tree Board) and suspend the application of imidacloprid because of its questionable effectiveness as a treatment for controlling aphid infestations in birch trees.)

1. The pesticide applicator should know and understand the characteristics of those materials used by either him or those employees who he is supervising and be aware of and understand those recommendations stipulated by the manufacturer.
2. Ineffectual control of pests, damage, injury or death to plants, or animals resulting from the use of chemicals exceeding the limitation of the manufacturer's recommendations shall be considered the responsibility of the licensed operator.
3. The application should provide coverage to all portions of the infested or infected tree being treated or it shall be considered inadequate to perform such operations.
4. Application equipment shall be kept clean and in good working order. The Superintendent of Parks or his/her designee shall inspect it at any time and take samples of spray materials being applied.
5. Operation with dirty tanks or equipment, or unsanitary unsafe methods of washing out or draining of it in public sewers and gutters is prohibited.
6. No spray application shall be carried out when there is sufficient wind to make pesticide control ineffectual or rated a hazard to person, plants or property.