- 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.

Additionally in 1995, the city council approved a birch tree replacement policy that authorizes staff to approve requests from property owners to have the birch tree in the planting strip adjacent to their property removed due to aphid problems. Because the aphids and other insects do not impact other species of trees to the same extent as they do with the birch trees, this policy was restricted to applying only to the birch trees. Trees other than birch are treated for aphids with chemical applications upon request from the adjacent property owners or residents.

## b. Requests

Property owners may request a birch tree removal application forms from the Longview Parks Department. If the resident applicant is not the property owner, he/she must have approval in writing from the property owner allowing for the removal and submit such along with the application. The requesting party must be the adjacent resident or property owner. The form will explain the removal program and give alternative options to removing the tree. Applicants are encouraged to contact the Parks Superintendent prior to submitting the request should they have any questions or concerns. The form along with the tree replacement fee must be received by the parks department in order to activate the scheduling of the tree removal. Purchasing a replacement tree is not optional.

## c. Procedure for Tree Removal

Within five (5) days of receiving the removal application form and the tree replacement fee, the Parks Superintendent or his/her designee will contact the applicant to discuss the removal process and any applicable alternatives. A site inspection will take place to determine if there is any health or safety related issue with the tree that would warrant its removal regardless of the aphids. Finding such would release the applicant from having to pay for the replacement tree.

Before a removal can take place, the parks department will\_may apply a chemical treatment to the tree during the appropriate season to determine if the aphid population can be sufficiently reduced so as to eliminate the need for removal. (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 use of imidacloprid because of its questionable effectiveness as a treatment for controlling aphid infestations in birch trees.) If a chemical treatment is applied, the tree will be inspected afterward the treatment is applied to determine the results, which will be shared with the applicant. Removal will only be approved if the results determine that the chemical application has not had a sufficient impact. Should the results prove to be insufficient and should the applicant still desire to have the tree removed, a date will be scheduled for the work. The removal will consist of the following steps: