

NOTICE OF DECISION

PLANNING DIVISION
555 LIBERTY ST. SE, RM 305
SALEM, OREGON 97301
PHONE: 503-588-6173
FAX: 503-588-6005



*Si necesita ayuda para comprender esta información, por favor llame
503-588-6173*

DECISION OF THE PLANNING ADMINISTRATOR

TREE CONSERVATION PLAN ADJUSTMENT: TCPA21-13

APPLICATION NO.: 21-116842-NR

NOTICE OF DECISION DATE: October 1, 2021

REQUEST: A Tree Conservation Plan Adjustment (TCPA) to Tree Conservation Plan Case No. 21-02, which originally proposed the preservation of 28.8 percent, out of a total of 66 trees. The proposed TCPA will reduce the preservation to 25.8% by removing an additional two trees. The subject property is approximately 19.89 acres in size, zoned RS (Single Family Residential), and located at 6719 Devon Avenue SE (Marion County Assessor's Map and Tax Lot number 083W22C / 0300).

APPLICANT: HSF Development LLC (Brandie Dalton)

LOCATION: 6719 Devon Avenue SE

CRITERIA: Salem Revised Code (SRC) Chapters 808.040.

FINDINGS: The findings are in the attached Decision dated October 1, 2021.

DECISION: The **Planning Administrator APPROVED** TCPA21-13 subject to the following conditions of approval:

- Condition 1:** The applicant shall preserve all five trees on Lot 65 and a 22" Fir tree on Lot 88.
- Condition 2:** The conditions of SUB21-01 shall be complied with during all construction activities.
- Condition 3:** Any changes to the approved Tree Conservation Plan Adjustment must be submitted to the Community Development Department in the form of another Tree Conservation Plan Adjustment application for review and approval.
- Condition 4:** No tree designated for preservation may be removed or critically damaged unless and until a Tree Conservation Plan Adjustment application is submitted to the Community Development Department and approval has been granted by the Planning Administrator. Failure to preserve trees marked for preservation may result in a civil penalty.
- Condition 5:** Prior to and during any grubbing, grading and construction activities, all trees designated for preservation shall be protected from removal or critical damage. Trees designated for protection

shall be clearly marked on-site. Required tree protection measures during construction shall consist of protective fencing placed under the canopy of the tree. No grubbing, grading, construction, vehicle parking, or storage/disposal of materials/fill shall be allowed inside the protective fencing.

Condition 6: Adherence to the Tree Conservation Plan Adjustment is required at the time of building permit application. All trees designated for preservation under the Tree Conservation Plan Adjustment shall be protected, as required above, until issuance of a Notice of Final Completion for each affected parcel/lot.

Condition 7: Each lot or parcel within the development proposal shall comply with the tree planting requirements set forth in SRC 808.050.

The applicant, and all representatives thereof, shall comply with all applicable development standards of SRC Chapter 808. The approved Tree Conservation Plan Adjustment is on file with the City of Salem and is binding on the lots created by the division of the subject property. No tree designated for removal on the approved Tree Conservation Plan Adjustment shall be removed or critically damaged prior to the Tree Conservation Plan Adjustment approval date.

Approval of a Tree Conservation Plan Adjustment application does not expire.

Case Manager: Jamie Donaldson, Planner II, jdonaldson@cityofsalem.net, 503-540-2328

This decision is final unless written appeal from the applicant or the owner of the subject property is filed with the City of Salem Planning Division Room 305, 555 Liberty Street SE, Salem OR 97301 no later than **Monday, October 18, 2021 by 5:00 p.m.** The appeal must state where the decision failed to conform to the approval criteria in SRC Chapter 808. The appeal fee must be paid at the time of filing. If the appeal is untimely and/or lacks the proper fee, the appeal will be rejected. The Salem Hearings Officer will review the appeal at a public hearing. After the hearing, the Hearings Officer may amend, rescind, or affirm the action or refer the matter to staff for additional information.

<http://www.cityofsalem.net/planning>

BEFORE THE PLANNING ADMINISTRATOR OF THE CITY OF SALEM
TREE CONSERVATION PLAN ADJUSTMENT CASE NO. TCPA21-13
DECISION

IN THE MATTER OF APPROVAL OF) TREE CONSERVATION PLAN
TREE CONSERVATION PLAN) ADJUSTMENT
ADJUSTMENT CASE NO. TCPA21-13)
)
6719 DEVON AVENUE SE) OCTOBER 1, 2021

In the matter of the application for a Tree Conservation Plan Adjustment, the Planning Administrator, having received and reviewed evidence and the application materials, makes the following findings and adopts the following order as set forth herein.

REQUEST

A Tree Conservation Plan Adjustment (TCPA) to Tree Conservation Plan Case No. 21-02, which originally proposed the preservation of 28.8 percent, out of a total of 66 trees. The proposed TCPA will reduce the preservation to 25.8% by removing an additional two trees. The subject property is approximately 19.89 acres in size, zoned RS (Single Family Residential), and located at 6719 Devon Avenue SE (Marion County Assessor's Map and Tax Lot number 083W22C / 0300).

PROCEDURAL FINDINGS

1. On September 7, 2021, an application for a Tree Conservation Plan Adjustment was submitted for property located at 6719 Devon Avenue SE (**Attachment A**).
2. On May 3, 2021, Tree Conservation Plan, Case No. TCP21-02, was approved for the subject property in conjunction with Subdivision and Adjustment Case No. SUB21-01. The original tree conservation plan identified a total of 66 trees on the property, with 19 trees identified for preservation and 47 trees identified for removal (28.8 percent of trees to remain).

SUBSTANTIVE FINDINGS

1. Proposal

The tree conservation plan adjustment will reduce the preservation to 25.8% by removing an additional two trees (**Attachment B**). A summary of the total trees identified for preservation and removal under the original tree conservation plan and this adjustment are included in the table below:

Tree Conservation Plan Summary						
Case No.	Approval Date	Trees Preserved	Percentage Preserved	Trees Removed	Percentage Removed	Total Trees on subject property
TCP21-02	May 3, 2021	19	28.8%	47	71.2%	66
TCPA21-13	October 1, 2021	17	25.8%	49	74.2%	66

2. Applicability

Except as provided under the following exceptions, no tree or native vegetation designated for preservation in a tree conservation plan shall be removed unless a tree conservation plan adjustment has been approved pursuant to this section.

Exceptions: A tree conservation plan adjustment is not required for:

- A tree that has been removed due to natural causes; provided, however, that evidence must be provided to the Planning Administrator demonstrating the removal was due to natural causes.
- Removal of a hazardous tree, subject to a tree and vegetation removal permit issued under SRC 808.030.
- Removal necessary to effect emergency actions excepted under SRC 808.030(a)(2)(H).

3. Analysis of Tree Conservation Plan Adjustment Approval Criteria:

The approval criteria for a Tree Conservation Plan are found in SRC 808.040(d).

There are special conditions that could not have been anticipated at the time the tree conservation plan was submitted that create unreasonable hardships or practical difficulties which can be most effectively relieved by an adjustment to the tree conservation plan.

Finding: The applicant's written statement, (**Attachment C**), indicates a determination was made to remove an additional two trees after beginning work on site: the 30" Fir tree on Lot 37 due to grading of the site; and the 20" Cherry Tree on Lot 5 currently in poor health and dying, but was originally conditioned to be saved as a riparian tree. Because the impacts of grading and the decline of tree health were not anticipated, an adjustment is necessary to remove the two trees currently preserved by the original tree conservation plan and eliminate Condition 1 of the original tree conservation plan. Further review for removal of the riparian tree is addressed below. Staff finds this criterion satisfied.

When the tree conservation plan adjustment proposes the removal of a significant tree, there are no reasonable design alternatives that would enable preservation of the tree.

Finding: The proposed tree conservation plan adjustment does not propose removal of significant trees. This criterion is not applicable.

When the tree conservation plan adjustment proposes the removal of a tree or native vegetation within a riparian corridor, there are no reasonable design alternatives that would enable preservation of the tree or native vegetation.

Finding: Under the originally approved tree conservation plan, the Champion Swale waterway was identified adjacent to the subject property, thereby designating the 20" Cherry tree on Lot 5 as a riparian tree. However, the applicant's written statement indicates that this swale is dry most of the year and is non-fish bearing; therefore, the tree will have no impact on the swale or the riparian corridor if removed. In addition, the applicant submitted an arborist report (**Attachment D**) indicating the subject Cherry tree is girdled by overgrown ivy, further impacted by soil erosion and potential root rot, and causing the tree to die. The Arborist reports the tree has a high failure rate and is recommended for removal.

Staff concurs with the applicant’s written statement and arborist’s recommendation that the tree is in poor health and dying, and removal of the 20” Cherry tree on Lot 5 is warranted. As there are no alternative designs that would save the tree, this criterion is satisfied and Condition 1 of TCP21-02 is removed.

When the tree conservation plan adjustment proposes to reduce the number of trees preserved in the original tree conservation plan below 25 percent, only those trees reasonably necessary to accommodate the proposed development are designated for removal.

Finding: Under the originally approved tree conservation plan, it was determined that an additional six trees originally designated for removal would be re-designated for preservation to maintain the 25 percent retention standard. Therefore, 28.8 percent of the trees on the property were identified for preservation, subject to the following conditions still applicable to this adjustment:

Condition 1: The applicant shall preserve all five trees on Lot 65 and a 22” Fir tree on Lot 88.

Condition 2: The conditions of SUB21-01 shall be complied with during all construction activities.

Under this proposed tree conservation plan adjustment, a total of 2 additional trees are proposed for removal, increasing the number of trees removed to 47 trees. With a total of 66 trees preserved throughout the subject property, a preservation rate of approximately 25.8 percent is maintained, and found in compliance with this criterion.

4. SRC Chapter 808 Planting Requirements

SRC Chapter 808.050 establishes tree planting requirements for lots or parcels to be used for Single-Family or Two-Family uses. The specific number of trees that must be provided on each lot is based upon the requirements of Table 808-1, as shown below:

Table 808-1

Lot Size	Required Trees
Up to and including 6,000 square feet	2
6,001 to 7,000 square feet	3
7,001 to 8,000 square feet	4
8,001 to 9,000 square feet	5
Above 9,000 square feet	6

In the event there are insufficient existing trees on a lot or parcel to meet the requirements of Table 808-1, the deficiency shall be made up by planting trees that are at least 1.5 inches in caliper.

IT IS HEREBY ORDERED

The proposed Tree Conservation Plan Adjustment is consistent with the provisions of SRC Chapter 808 and is hereby **APPROVED**, subject to SRC Chapter 808 and the following conditions:

- Condition 1:** The applicant shall preserve all five trees on Lot 65 and a 22" Fir tree on Lot 88.
- Condition 2:** The conditions of SUB21-01 shall be complied with during all construction activities.
- Condition 3:** Any changes to the approved Tree Conservation Plan Adjustment must be submitted to the Community Development Department in the form of another Tree Conservation Plan Adjustment application for review and approval.
- Condition 4:** No tree designated for preservation may be removed or critically damaged unless and until a Tree Conservation Plan Adjustment application is submitted to the Community Development Department and approval has been granted by the Planning Administrator. Failure to preserve trees marked for preservation may result in a civil penalty.
- Condition 5:** Prior to and during any grubbing, grading and construction activities, all trees designated for preservation shall be protected from removal or critical damage. Trees designated for protection shall be clearly marked on-site. Required tree protection measures during construction shall consist of protective fencing placed under the canopy of the tree. No grubbing, grading, construction, vehicle parking, or storage/disposal of materials/fill shall be allowed inside the protective fencing.
- Condition 6:** Adherence to the Tree Conservation Plan Adjustment is required at the time of building permit application. All trees designated for preservation under the Tree Conservation Plan Adjustment shall be protected, as required above, until issuance of a Notice of Final Completion for each affected parcel/lot.
- Condition 7:** Each lot or parcel within the development proposal shall comply with the tree planting requirements set forth in SRC 808.050.

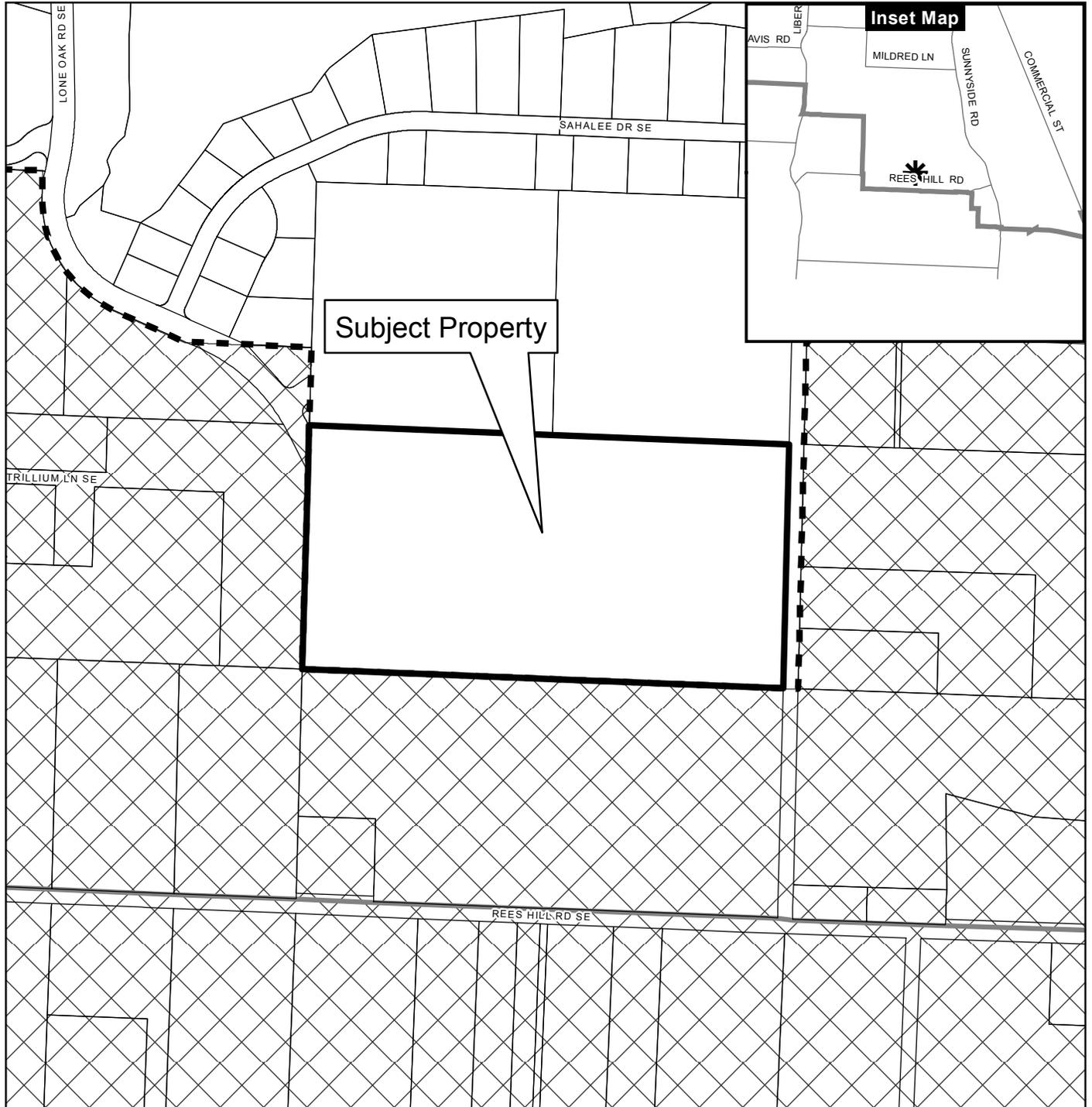


Jamie Donaldson, Planner II, on behalf of,
Lisa Anderson-Ogilvie, AICP
Planning Administrator

Attachments:

- A. Vicinity Map
- B. Approved Tree Conservation Plan
- C. Applicant's Written Statement
- D. Arborist Report

Vicinity Map 6719 Devon Avenue SE



Legend

- Taxlots
- Urban Growth Boundary
- City Limits
- Outside Salem City Limits
- Historic District
- Schools
- Parks



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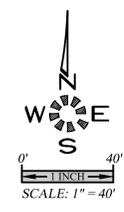
A:\6501-6599\6502-DevonEstates\Substation\Drawings\6502L20.dwg, P103R, 1/20/2021 2:58:59 PM, P5ounders

Removal approved under TCPA21-13



66 Total Trees within Boundary
 17 Trees to be Preserved
 49 Trees to be Removed
 25.8% persevered

Attachment B



PRELIMINARY TREE CONSERVATION PLAN - ONSITE: WEST

DEVON ESTATES

NO CHANGES, MODIFICATIONS OR REPRODUCTIONS TO BE MADE TO THESE DRAWINGS WITHOUT WRITTEN AUTHORIZATION FROM THE DESIGN ENGINEER. DIMENSIONS & NOTES TAKE PRECEDENCE OVER GRAPHICAL REPRESENTATION.

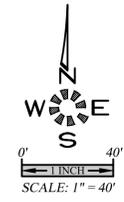
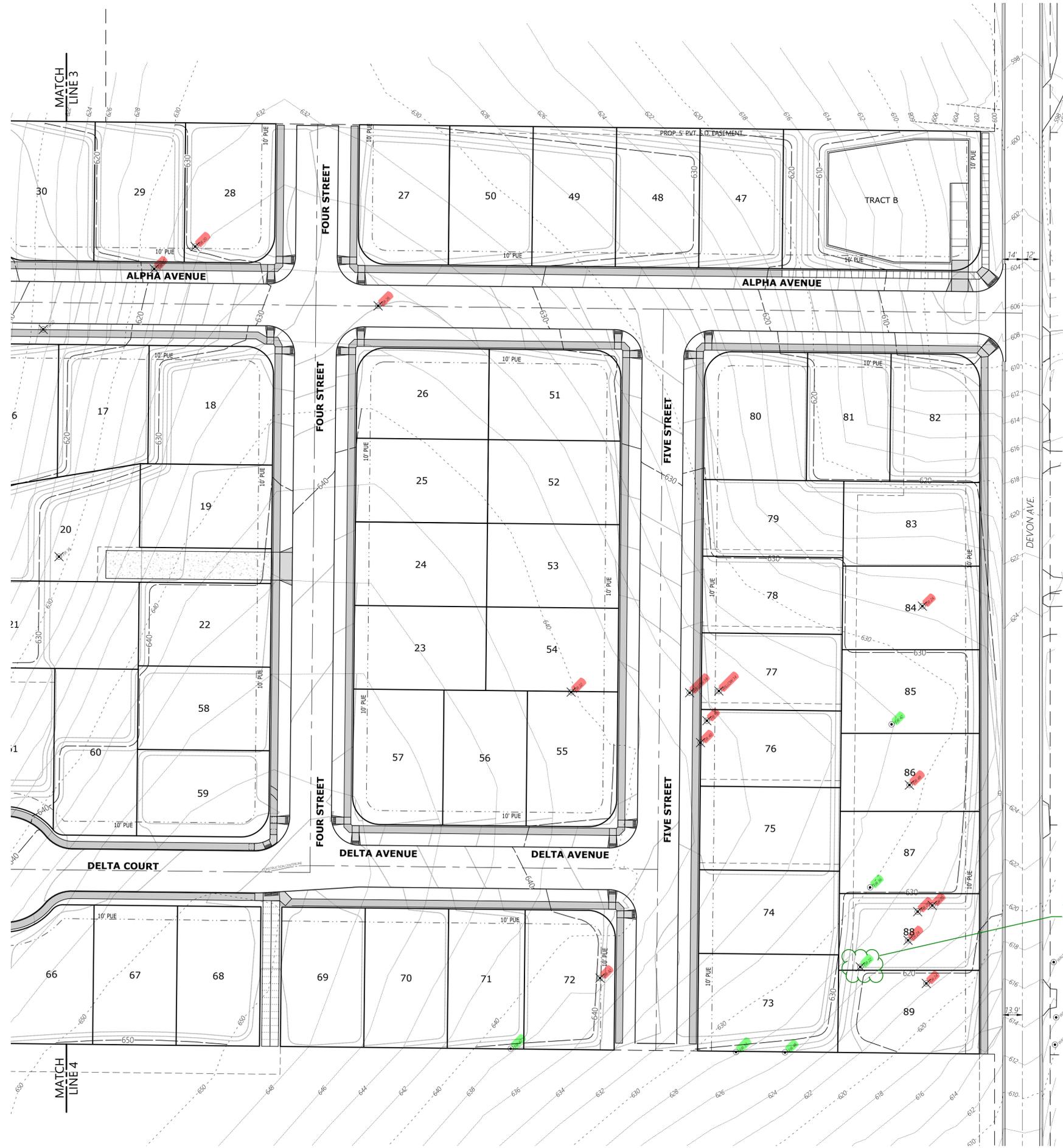
6502a20 P103R
 Design: M.D.G.
 Drawn: P.H.S.
 Checked: M.D.G.
 Date: NOV. 2017
 Scale: AS SHOWN
 As-Built: _____



EXPIRES: 06-30-2021

JOB # 6502

P103



**PRELIMINARY
TREE CONSERVATION
PLAN - ONSITE: EAST**

DEVON ESTATES

NO CHANGES, MODIFICATIONS OR REPRODUCTIONS TO BE MADE TO THESE DRAWINGS WITHOUT WRITTEN AUTHORIZATION FROM THE DESIGN ENGINEER. DIMENSIONS & NOTES TAKE PRECEDENCE OVER GRAPHICAL REPRESENTATION.

Design: M.D.G.
 Drawn: P.H.S.
 Checked: M.D.G.
 Date: NOV. 2017
 Scale: AS SHOWN
 As-Built: _____



JOB # 6502

P104

TRANSMITTAL



DATE: September 5, 2021

JOB #: 6502

To: Planning Division
Community Development
Room 305

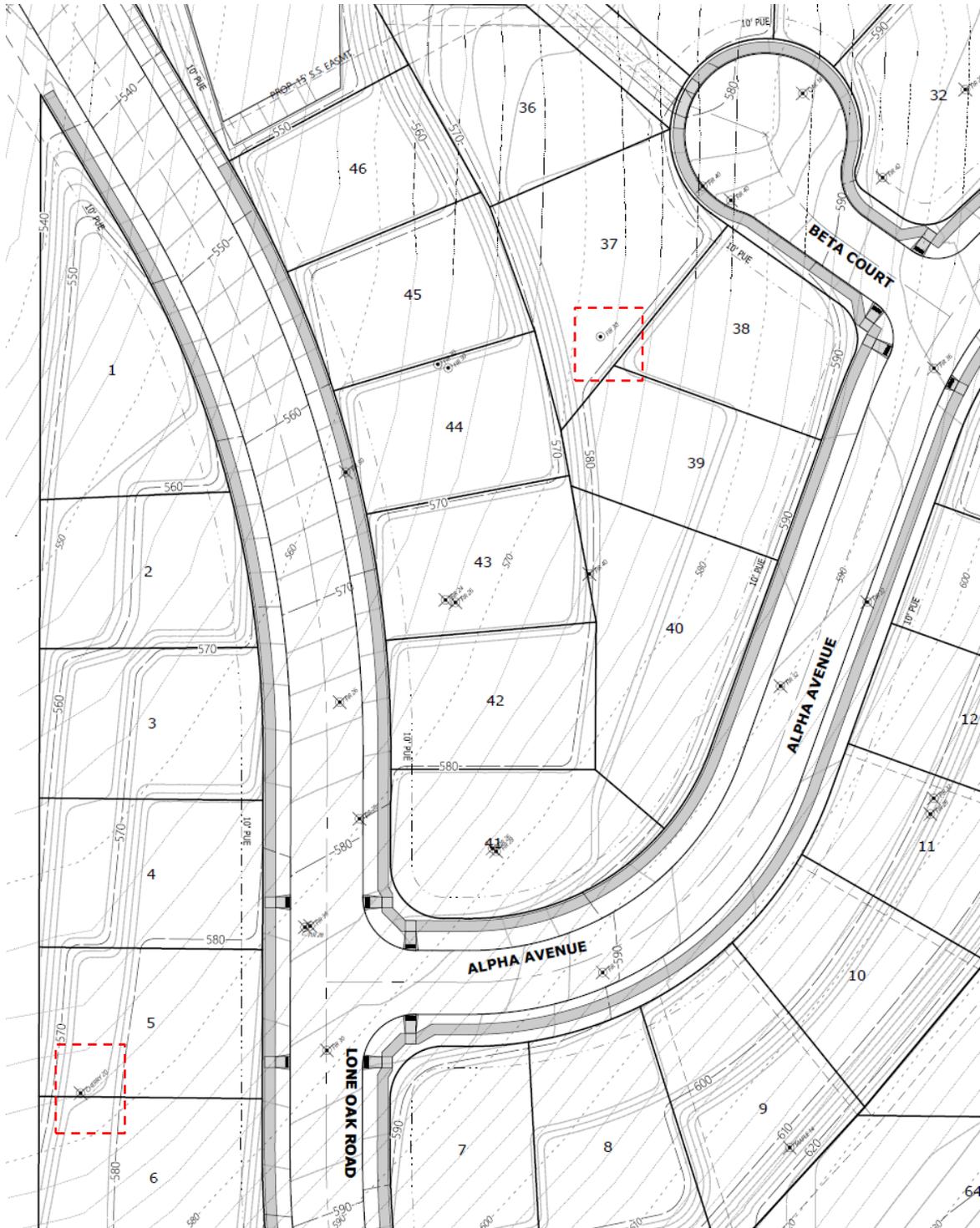
PROJECT: Devon Subdivision

FROM: Brandie Dalton, Land-Use Planner

RE: *TREE CONSERVATION PLAN ADJUSTMENT FOR TCP21-02*

ENCLOSED IS A TREE CONSERVATION PLAN ADJUSTMENT FOR THE DEVON SUBDIVISION (SUB21-01). AFTER BEING OUT ON THE SITE, IT WAS DETERMINED THAT THE CHERRY TREE LOCATED ON LOT 5 NEEDS TO BE REMOVED. DUE TO GRADING ON THE SITE, THE FIR TREE ON LOT 37 NEEDS TO BE REMOVED AS WELL.

THE APPLICANT IS REQUESTING A TREE CONSERVATION ADJUSTMENT IN ORDER TO REMOVE THE CHERRY TREE LOCATED ON LOT 5 AND THE FIR TREE LOCATION ON LOT 37 OF THE SUBDIVISION. ON MAY 3, 2021, THE APPLICANT WAS GIVEN APPROVAL TO REMOVE 47 TREES ON THE SITE THROUGH TREE CONSERVATION PLAN (TCP) 21-02.



SRC 808.040(d):

- (1) THERE ARE SPECIAL CONDITIONS THAT COULD NOT HAVE BEEN ANTICIPATED AT THE TIME THE TREE CONSERVATION PLAN WAS SUBMITTED THAT CREATED UNREASONABLE HARDSHIPS OR PRACTICAL DIFFICULTIES.**

APPLICANT FINDINGS: TCP 21-02 ALLOWED THE APPLICANT APPROVAL TO REMOVE 47 TREES ON THE SITE WHILE PRESERVING 19 TREES (28%), OF THE ORIGINAL TREES WITHIN SUB21-01.

THE APPLICANT IS REQUESTING THE REMOVAL OF 2 ADDITIONAL TREES ON THE SITE, WHICH WOULD BRING THE PROPOSED TREES TO BE REMOVED TO 49 TREES.

AFTER STARTING WORK AND GRADING ON THE SITE, IT WAS DETERMINED THAT THE CHERRY TREE ON LOT 5 AND THE FIR TREE ON LOT 37 BOTH NEED TO BE REMOVED.

DUE TO GRADING ON LOT 37, THE FIR TREE WILL NEED TO BE REMOVED.

AN ARBORIST REPORT DATED AUGUST 23, 2021, INDICATES THAT THE CHERRY TREE ON LOT 5 IS COVERED IN IVY WHICH IS CAUSING THE TREE TO DIE. THE TREE HAS A HIGH FAILURE RATE AND IT IS RECOMMENDED TO BE REMOVED (SEE ATTACHED ARBORIST REPORT).

THE APPLICANT HAD ORIGINALLY REQUESTED THIS TREE ON LOT 5 TO BE REMOVED. HOWEVER, AS PART OF THE TCP21-02, THE FOLLOWING CONDITION WAS PLACED ON THE APPROVAL:

- CONDITION 1: THE APPLICANT SHALL PRESERVE THE 20" CHERRY TREE ON LOT 5 AS A DESIGNATED RIPARIAN TREE.**

THE HEALTH OF THE TREE ON LOT 5 AND THE LOCATION WITH THE RIPARIAN CORRIDOR IS NOT A SPECIAL CONDITION THAT COULD HAVE BEEN ANTICIPATED BY THE APPLICANT.

ACCORDING TO STAFF, THIS TREE ADJACENT TO THE CHAMPION SWALE. HOWEVER, THIS SWALE IS DRY A MAJORITY OF THE YEAR AND IS NON-FISH BEARING. THEREFORE, THE REMOVAL WILL HAVE NO IMPACTS ON THE SWALE OR THE RIPARIAN CORRIDOR.

- (2) WHEN THE TREE CONSERVATION PLAN ADJUSTMENT PROPOSES THE REMOVAL OF A SIGNIFICANT TREE, THERE ARE NO REASONABLE DESIGN ALTERNATIVE THAT WOULD ENABLE PRESERVATION OF THE TREE.**

APPLICANT FINDINGS: THERE ARE NO SIGNIFICANT TREES LOCATED WITHIN THE BOUNDARY OF THE APPROVED SUBDIVISION. THEREFORE, THIS CRITERIA IS NOT APPLICABLE.

- (3) WHEN THE TREE CONSERVATION PLAN ADJUSTMENT PROPOSES THE REMOVAL OF A TREE OR NATIVE VEGETATION WITHIN A RIPARIAN CORRIDOR, THERE ARE NO REASONABLE DESIGN ALTERNATIVES THAT WOULD ENABLE PRESERVATION OF THE TREE OR NATIVE VEGETATION.**

APPLICANT FINDINGS: ACCORDING TO STAFF, THE CHAMPION SWALE WATERWAY IS LOCATED ADJACENT TO THE WEST EDGE OF THE SUBJECT PROPERTY, CREATING A RIPARIAN CORRIDOR AND THE CONDITION TO RETAIN THE CHERRY TREE ON LOT 5.

ACCORDING TO STAFF, THIS TREE ADJACENT TO THE CHAMPION SWALE. HOWEVER, THIS SWALE IS DRY A MAJORITY OF THE YEAR AND IS NON-FISH BEARING. THEREFORE, THE REMOVAL WILL HAVE NO IMPACTS ON THE SWALE OR THE RIPARIAN CORRIDOR.

AN ARBORIST REPORT DATED AUGUST 23, 2021, INDICATES THAT THE CHERRY TREE ON LOT 5 IS COVERED IN IVY WHICH IS CAUSING THE TREE TO DIE. THE TREE HAS A HIGH FAILURE RATE AND IT IS RECOMMENDED TO BE REMOVED (SEE ATTACHED ARBORIST REPORT).

SINCE THE TREE IS IN POOR HEALTH AND DYING, THERE ARE NO ALTERNATIVE DESIGNS THAT WOULD SAFE THE TREE. THE ARBORISTS RECOMMENDATION WARRANTS REMOVAL OF THE CHERRY TREE ON LOT 5 OF SUB21-01.

(4) WHEN THE TREE CONSERVATION PLAN ADJUSTMENT PROPOSES TO REDUCE THE NUMBER OF TREES PRESERVED IN THE ORIGINAL TREE CONSERVATION PLAN BELOW 25 PERCENT, ONLY THOSE TREES REASONABLY NECESSARY TO ACCOMMODATE THE PROPOSED DEVELOPMENT ARE DESIGNATED FOR REMOVAL.

APPLICANT FINDINGS: THE PROPOSED TCPA WILL RESULT IN THE REMOVAL OF 2 ADDITIONAL TREES WHILE PRESERVING 17 TREES (26%) ON THE SITE WITHIN THE DEVON SUBDIVISION (SUB21-01).

TREE INVENTORY

TOTAL TREES ON SITE:	66
TREES TO BE REMOVED:	49
TREES TO REMAIN:	17

IF YOU HAVE ANY QUESTIONS REGARDING THIS ISSUE, PLEASE FEEL FREE TO CONTACT US. THANK YOU.

Brandie Dalton
Land-Use Planner
bdalton@mtengineering.net



A Photographic Guide to the Evaluation of Hazard Trees in Urban Areas

TREE HAZARD EVALUATION FORM 2nd Edition

Site/Address: 6719 Devon Ave SE
Map/Location: Salem, OR 97306
Owner: private
Date: 8-23-2021
Inspector: Austin Cohn 50-10036A

HAZARD RATING table with columns: Failure Potential, Size of part, Target Rating, Hazard Rating. Includes rows for Immediate action needed, Needs further inspection, Dead tree.

TREE CHARACTERISTICS

Tree #: Species: wild cherry tree
DBH: 34" # of trunks: 2 Height: 45' Spread: 20'
Form: minor asymmetry
Crown class: co-dominant
Live crown ratio: 30% Age class: mature
Pruning history: none
Special Value: none

TREE HEALTH

Foliage color: chlorotic
Foliage density: sparse
Annual shoot growth: average
Woundwood development: poor
Vigor class: poor
Major pests/diseases:
Growth obstructions: other Ivy covered

SITE CONDITIONS

Site Character: industrial
Landscape type: none
Irrigation: none
Recent site disturbance? construction
% dripline paved: 0%
% dripline w/ fill soil: 10-25%
% dripline grade lowered: 10-25%
Soil problems: clay
Obstructions: none
Exposure to wind: single tree
Prevailing wind direction: none

TARGET

Use Under Tree: building, traffic
Can target be moved? N
Can use be restricted? N
Occupancy: frequent use

The International Society of Arboriculture assumes no responsibility for conclusions or recommendations derived from use of this form.

TREE DEFECTS

ROOT DEFECTS:

Suspect root rot: N Mushroom/conk/bracket present: N ID: _____

Exposed roots: severe moderate low Undermined: severe moderate low

Root pruned: _____ distance from trunk Root area affected: 10 % Buttress wounded: Y N When: _____

Restricted root area: severe moderate low Potential for root failure: severe moderate low

LEAN: 20 deg. from vertical natural unnatural self-corrected Soil heaving: N

Decay in plane of lean: N Roots broken Y N Soil cracking: N

Compounding factors: Lots of soil erosion, in a heavily saturated area Lean severity: severe moderate low

CROWN DEFECTS: Indicate presence of individual defects and rate their severity (s = severe, m = moderate, l = low)

DEFECT	ROOT CROWN	TRUNK	SCAFFOLDS	BRANCHES
Poor taper	S	M	M	
Bow, sweep				
Codominants/forks	S	S	S	
Multiple attachments				
Included bark		S	S	
Excessive end weight				
Cracks/splits		M		
Hangers				
Girdling	S			
Wounds/seam				
Decay		M		
Cavity				
Conks/mushrooms/bracket	M	M		
Bleeding/sap flow				
Loose/cracked bark				
Nesting hole/bee hive				
Deadwood/stubs				
Borers/termites/ants				
Cankers/galls/burrs				
Previous failure				

HAZARD RATING

Tree part most likely to fail: codominant at base

Inspection period: _____ annual _____ biannual _____ other _____

Failure Potential + Size of Part + Target Rating = Hazard Rating

3 + 3 + 3 = 9

Failure potential: 1 - low; 2 - medium; 3 - high; 4 - severe

Size of part: 1 - <6" (15 cm); 2 - 6-18" (15-45 cm);

3 - 18-30" (45-75 cm); 4 - >30" (75 cm)

Target rating: 1 - occasional use; 2 intermittent use;

3 - frequent use; 4 - constant use

HAZARD ABATEMENT

Prune: remove defective part reduce end weight crown clean thin raise canopy crown reduce restructure shape

Cable/Brace: _____ Inspect further: root crown decay aerial monitor

Remove tree: N Replace? Y N Move target: Y N Other: _____

Effect on adjacent trees: none evaluate

Notification: owner manager governing agency Date: _____

COMMENTS tree is girdled by overgrowth Ivy causing tip die back