

# Comment: Revised Draft Tokai Cecilia Implementation Plan (Revised TCIP)

Name of Stakeholder Organisation			
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## COMMENTS:

Comments must be emailed to [TCMF@sanparks.org](mailto:TCMF@sanparks.org) by 19 June 2023

<b>Section</b> <i>(Indicate sentence/ paragraph number / page number)</i>	<b>Comment</b> <i>(State why the section is not supported or what the problem is with the provision)</i>	<b>Suggestion</b> <i>(Suggested deletion / amendment / addition)</i>
General Comment	I support a balanced outcome for shade and fynbos restoration that meets the needs for recreation, health and well-being – and safety - per the founding intent of Table Mountain National Park and the Tokai and Cecilia areas.	
General Comment	I query why this process is taking so long and ask whether this is a deliberate delaying tactic that brings us closer to the 2024 harvesting date.	
General Comment	Public outcry over the felling of the Tokai and Cecilia Plantations started in 2005. With only 9% of the original 600ha of shaded landscapes of Tokai and Cecilia left, 18 years later we are still arguing for a balanced outcome. Why is SANParks so intent in ignoring the voice of the people seeking the balanced outcome promised to them (see below) and given valid scientific question as to the viability of successful fynbos restoration.	
Page 8. Introduction. Paragraph 1. Context	The introduction takes the forestry exit strategy of 2004 as its starting point. This is wrong. The forestry exit strategy was adopted without public consultation, and is in conflict with the recommendations of the 1994 Fuggle Report that formed the basis of the Heads of Agreement with the City of Cape Town, following extensive public consultation and research. It also ignores that during the restructuring of State Forestry Assets in 1999, government undertook to preserve the Tokai and Cecilia plantations as working plantations given the public benefit these landscapes provided. It also ignores the fact that the plantations were included as working plantations in the World Heritage Site inscription.  The introduction, to reflect accurately must start in 1993 when UCT's Environmental Evaluation Unit was appointed prepare the Policy for the Multipurpose Use of the Cape Peninsula.	The TCIP seeks to redress historical imbalance created by SANParks by repurposing the forestry plantations in Tokai Cecilia in line with the Fuggle Report's recommendations, Heads of Agreement with the City of Cape Town, and the extensive public consultation on which the report and the agreements are based, promises made by the Ministers of Public Works, and Forestry, and the World Heritage Site inscription.
4.2.13. Creating shaded areas, page 19, final paragraph.	The revised TCIP refers to shaded landscapes outside Table Mountain National Park as alternatives to shade space in the national park. The TCMF process refers to the Tokai	Remove references to land outside the national park.

	and Cecilia areas of the National Park. References to land outside the national park are not relevant	
Goal 3 (ii) Arboretum	This needs more than just investigation, it requires commitment. Lister's Place must be reopened as a tearoom – not just as an interpretation centre.	Reopen Lister's Place as a tearoom and interpretation centre.
Goal 3 (iii) Arboretum	Extension of the Arboretum needs to be more than just investigated. What does "prepare recreational zones for Tokai Arboretum" mean? The Arboretum is not a recreational zone suited to dogs, horses or mountain bikes.	Expand the Arboretum to make up for loss of shaded landscapes.
Goal 3 (v) Arboreteum	Shaded linkages needs more than just investigation, an undertaking must be given to create the linkages.	Create shaded linkages to nearby river courses and the corridor to the Redwood Grove.
Goal 4 (iv) Shade vs Goal 9 (v) Biodiversity	These two goals are contradictory. I support the intent to retain the treed areas of Lower Tokai and Cecilia but not an intent to change existing shade areas into areas for fynbos restoration.	
Goal 4 Shade	This section is too vague and contains no commitment to retain trees and shade space in Lower Tokai and Cecilia. The verbs need to show commitment. I want trees to be retained in Tokai and Cecilia either as a plantation or on a basis that transitions from pines to indigenous and non-invasive exotic species.	Change <i>investigate</i> and references to feasibility studies and possible amendments to confirmed commitment – evidenced by words like <i>implement</i> or <i>secure</i> or <i>undertake</i>
Goal 4 Shade	This section doesn't sufficiently acknowledge the importance of the cultural landscape of the Constantia-Tokai Valley - unlike the support given to biodiversity conservation in Goal 9.	It is important to acknowledge that that forests and plantations comprise an important element of the cultural landscape of the Constantia-Tokai Valley, especially those in Tokai and Cecilia, and that these are highly valued by many stakeholders.
Goal 6 Environmental education	The goal doesn't include reference to the cultural landscape of the Constantia-Tokai Valley, as understood by UNESCO's definition of the cultural landscape.	Environmental education will include promoting public awareness of the Tokai and Cecilia's role in the cultural landscape of the Constantia-Tokai Valley, as defined by UNESCO and described by leading heritage practitioners. Environmental education will include the history of forestry, and the importance and necessity of the urban forest.
Goal 9 Biodiversity	This goal ignores whether the various fynbos types can be fully restored in the contested spaces.	See below
Goal 9 Biodiversity	This makes no mention of scientific opinion that questions whether rehabilitation as envisaged is possible, nor the extent to which the plants found in lower and upper Tokai	This goal acknowledges the experimental nature of ecosystem rehabilitation in Tokai and Cecilia and

	<p>are commonly found in other fynbos sub-types. It works to the assumption that fynbos can be restored, despite this not necessarily being possible given changes in the soil and increased nutrient inputs. It also assumes that the seedbanks under the pines may still exist, when scientific evidence indicates otherwise.</p> <p>The opinion represented in the TCIP is one-sided and does not represent a rounded picture of scientific opinion.</p>	<p>scientific opinion that it may fail to achieve the outcomes as envisaged. There is the need for a holistic approach that takes all elements of this landscape fully into account, including trees and planted landscapes.</p>
Goal 10, Recreation	<p>I don't understand this section - where are these recreational zones? How big are they? Are they shared? What trails/tracks/paths will be closed or where will new trails be opened?</p>	<p>Include maps and define better.</p>

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**Signature**

Date: