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PO Box 1082 ♦ Strand, 7139 ♦ Tel 021-851 0078 ♦ Fax 021-852 0966
e-mail: tokai@geostratics.co.za

My Ref. TMNP-003-01

23 March 2007

Dear Stakeholder

TOKAI CECILIA MANAGEMENT FRAMEWORK: COMMENTS AND RESPONSE REPORT

Please find attached the Tokai and Cecilia draft Management Framework Comments and Responses Report.

The report provides firstly, an overview summary of the wide range of comments received on the draft Management Framework and secondly, lists the detailed responses by SANParks to specific comments.

Subsequent to the closing date for comments on the draft Management Framework, approaches by the City of Cape Town, Dept. of Water Affairs and Forestry (DWAF) and Dept. of Environmental Affairs and Tourism (DEAT), delayed the release of this report.

Firstly, the Mayor of the City of Cape Town wished to establish a 'roundtable' of eminent persons to advise her on the relevant issues pertaining to Tokai and Cecilia. Secondly, DEAT and DWAF have been engaging SANParks on various management issues related to Tokai and Cecilia.

The way forward will see the finalisation of the Management Framework based on this Comments and Responses report and on further interaction with the City, DWAF and DEAT. These interactions may affect the finalisation of the Management Framework and the intended completion date in early May 2007.

It must be kept in mind that the Framework represents a long term vision for Tokai and Cecilia. It is a 'framework for planning' not a 'plan for implementation'. What flows from the Management Framework are a series of more detailed 'plans for implementation' (ie precinct plans, landscape plans, rehabilitation plans etc) with appropriate stakeholder engagement in preparing these plans.

This report has been e-mailed to stakeholders; is available on the Table Mountain National Park website (www.tmnp.co.za) and in the following libraries: Athlone, Claremont, Cape Town, Hout Bay, Mowbray, Rondebosch, Tokai and at the Westlake and Tokai offices of TMNP.

Geostratics and SANParks wish to thank all I&APs for their effort in submitting comments on the draft Management Framework.

Yours sincerely

SC Lategan
TRP(SA)

SANParks

TOKAI CECILIA MANAGEMENT FRAMEWORK: COMMENTS AND RESPONSE REPORT

Table Mountain National Park

23 March 2007

This document is a synthesis of the comments made by Interested and Affected Parties on the Draft Tokai Cecilia Management Framework.

TABLE OF CONTENTS

1 INTRODUCTION.....	1
1.1 Purpose of this report.....	1
1.2 Process.....	1
2 KEY ISSUES.....	2
2.1 GENERAL ISSUES.....	2
2.1.1 PROCESS, PUBLIC PARTICIPATION AND PRINCIPLES.....	2
2.1.2 MANAGEMENT FRAMEWORK FORMAT.....	3
2.2 THEME BASED ISSUES.....	4
2.2.1 BIODIVERSITY.....	4
a) Recreation versus biodiversity priority.....	4
b) Pines and fire management.....	4
c) Area required for conserving Cape Flats Sand Fynbos (CFSF).....	4
d) Extent of ecological corridors required.....	5
e) Conservation status of Granite Fynbos.....	5
f) Conservation status of Afromontane forest and rehabilitation viability.....	5
g) Effect of clear felling on faunal species (Baboons).....	6
e) Alien vegetation management.....	6
2.2.2 HERITAGE.....	6
a) Heritage status of the plantations vs. biodiversity.....	6
2.2.3 RECREATION.....	7
a) Availability of recreational areas in Lower Tokai.....	7
b) Extent of area where dogs will be permitted and under what conditions.....	7
c) The type of trees to be planted for shaded recreation purposes.....	7
2.2.4 ECO-TOURISM AND DEVELOPMENT.....	8
a) Perceived conflict between eco-tourism and recreation.....	8
b) Exiting from plantations will result in job losses.....	8
2.2.5 MANAGEMENT AND MONITORING.....	9
a) SANParks capacity to undertake the rehabilitation.....	9
2.3 LANDSCAPE AND PRECINCT PROPOSALS.....	9
2.4 CONCLUSION.....	9
3 THE WAY FORWARD.....	9

ANNEXURE

A	List of Comments received
B	Comments: Process, Public Participation and Principles
C	Comments: Management Framework Format
D	Biodiversity Comments
E	Heritage Comments
F	Recreation Comments
G	Economic Development Comments:
H	Comments: Management and Monitoring
I	Landscape and Precinct Proposals

FIGURES

Figure 1: Summary of process followed

Acronyms:

BMT	Baboon Monitoring Team
CDF	Conservation Development Framework
CFSF	Cape Flats Sand Fynbos
CoCT	City of Cape Town
DEAT	Department of Environmental Affairs and Tourism
DTPW: WC	Department of Transport and Public Works: Western Cape
DWAF	Department of Water Affairs and Forestry
FOTF	Friend of Tokai Forest
I&AP	Interested and Affected Party
MF	Management Framework

MTO	Mountain to Ocean Pty Ltd
PGF	Peninsula Granite Fynbos
SANParks	South African National Parks
TMNP	Table Mountain National Park

1 INTRODUCTION

1.1 Purpose of this report

The purpose of this report is to list and respond to the comments submitted by interested and affected parties (I&AP's) on the Tokai and Cecilia Draft Management Framework during the extended comments period 18 October 2006 to 15 December 2006. The report provides firstly, a summary response to the wide range of comments submitted by I&APs on the key issues affecting Tokai and Cecilia. Secondly, it provides a detailed response to the specific comments submitted by I&APs.

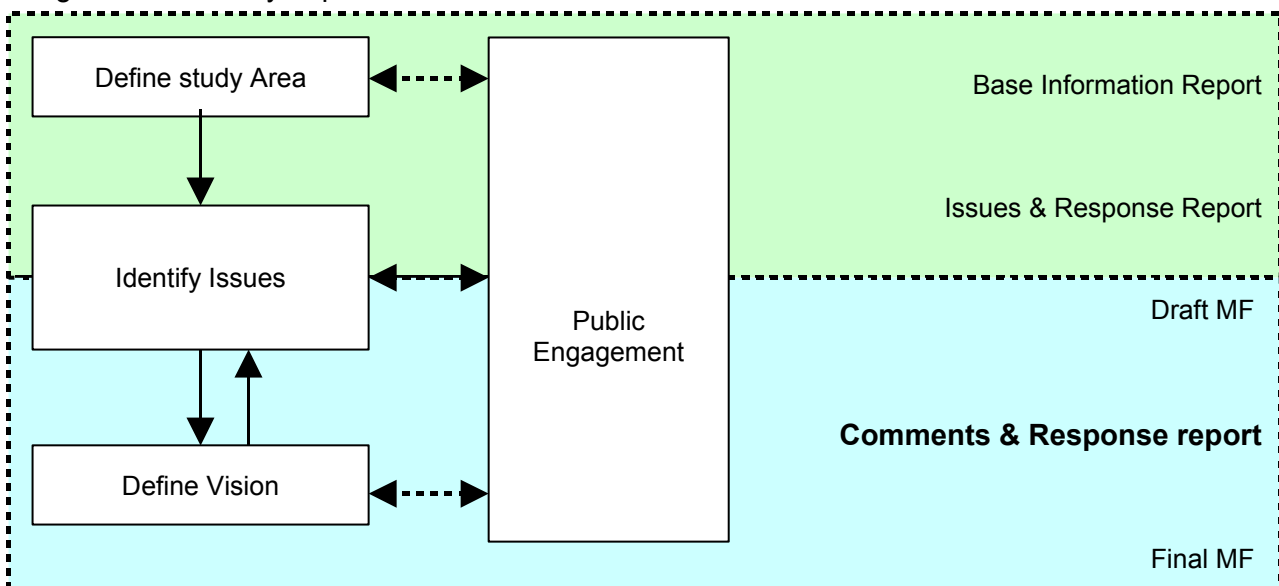
For both sections the comments received were analysed and were then grouped into the main themes identified in the draft Management Framework. Section 2 below provides a synthesis of the comments received and explains the underlying principles and approaches followed in the response tables._

The response tables (Annexures A to I) groups together similar comments submitted by I&APs under common themes. The comments are numbered to provide a quick reference to the original submissions (refer Annexure A).

1.2 Process

This Comments and Response Report reflects SANParks' responses to the comments and indicates how the Draft Management Plan may be amended. The final Management Framework will serve as a 'framework for planning' to be used by TMNP to guide the future rehabilitation, management and use of Tokai and Cecilia. The MF will create a level of certainty and common understanding on the future of Tokai and Cecilia and will also be used by TMNP in liaising with its partners (e.g. City, DWAF, DEAT) and with NGOs, CBO's and the public. The final Management Framework will be accepted by SANParks as an internal management document and will be made available to the public.

Figure 1: Summary of process followed



The Tokai and Cecilia MF process was initiated in July 2006. During the first phase, I&AP's were identified and provided with the opportunity to register. A Baseline Information Report (31 July 2006) was prepared to set the scene for the Management Framework. Opportunities were then provided for I&AP's and key stakeholder groups to identify issues through open days, workshops and written submissions. These issues were then captured and responded to in the Issues and Response Report (22 September 2006).

On 18 October 2006 the Draft Management Framework was released for public comment at a workshop with key stakeholder groups and presented to the wider public at an open day on 25 October 2006. After requests for an extension of time for comment, the period was extended until 15 December 2006.

2 KEY ISSUES

Over a hundred individual comments were received from I&APs representing individuals, organisations, and authorities and these comments ranged from a single statement to full reports with accompanying maps.

The outstanding feature of this wide range of comments is that for nearly all key issues raised – biodiversity, heritage, recreation, trees, fire etc - strongly opposing views were expressed by I&APs.

This disparity represents a challenging task to SANParks in seeking a common vision for the area. In responding to these divergent, opposing views, SANParks has been guided by the relevant National legislation and policies and the Park Management Plan and its guiding principles.

Section 2.1 below provides responses to General Issues raised regarding the process, public participation, and the format of the Management Framework document. Section 2.2 provides a set of summary responses to the opposing views expressed on the Theme Based Issues (i.e. biodiversity, heritage, recreation, eco-tourism, management, and landscape / precinct proposals).

The summary responses set out here inform the detailed responses to individual comments presented in Annexures A to I.

2.1 GENERAL ISSUES

2.1.1 PROCESS, PUBLIC PARTICIPATION AND PRINCIPLES

(Refer to Annexure B for specific comments and responses)

a) Decision to harvest the timber

An issue raised at the start of the Management Framework process was that Government did not consult with the public before the plantations were sold with the intention to harvest the trees and rehabilitate the area.

Response: The issue has been dealt with extensively in the Issues and Responses Report as well as the Background Information Report and Draft Management Framework and

therefore only a brief summary is provided. The decision to sell the plantations to MTO for harvesting was made by National Government. The assignment of the land to SANParks was negotiated between DEAT and DWAF. This flows directly from the original Cabinet decision that public and private conservation worthy land within the Cape Peninsula Protected Natural Environment (CPPNE), which includes Tokai and Cecilia plantations, be brought under the management of a single conservation authority namely SANParks. The Management Framework is thus driven by a decision taken at national government level with the mandate to SANParks to manage the area in terms of applicable legislation and policies.

b) Opportunity for public comment on the draft Management Framework

A general comment raised was that insufficient opportunity was made available for input and comment.

Response: The initial intent and request for I&AP's to register was advertised in local and regional newspapers, flyers were distributed and notices posted in Tokai and Cecilia. SANParks is confident that it can demonstrate that sufficient adverts and notices were posted in appropriate media to inform the public of the process. Open Days and stakeholder meetings were held and follow-up documentation made available for comment. The media also covered the debate during radio interviews, articles and letters in the newspapers. The comment period for the Draft Management Framework was extended from 30 days to 60 days, which provided sufficient time for input. During the Draft Management Framework comments period, an Open Day was held and the opportunity for key stakeholder groups to arrange for meetings to discuss specific matters was provided.

2.1.2 MANAGEMENT FRAMEWORK FORMAT

(Refer to Annexure C for detail comments and responses)

a) Management Framework objectives

A wide range of often conflicting suggestions were made regarding amendments to specific objectives in the draft Management Framework.

Response: In reviewing the draft Management Framework these will be considered and where appropriate the Management Framework will be amended. Due consideration will be given to ensure that these amendments do not conflict with any other objectives and that they are followed through to the strategies and actions.

b) Management Framework revision cycles

A concern was raised that as the Management Framework is not a fixed document is to be reviewed periodically, and this will allow SANParks to make amendments without public input.

Response: This Management Framework forms part of the TMNP's Integrated Environmental Management System. This system ensures that all the Park's Policies and Plans are reviewed on a five-yearly basis to ensure that the system is kept updated and new information and learnings are incorporated into management practice. The review and revision of the Management Framework will be done in consultation with stakeholders.

2.2 THEME BASED ISSUES

2.2.1 BIODIVERSITY

(Refer to Annexure D for detail comments and responses)

a) Recreation versus biodiversity priority

Strongly opposing views were presented on whether biodiversity or recreational needs should take priority. On the one extreme it was argued that recreational requirements (i.e. shaded landscapes) should take precedence over biodiversity conservation as TMNP is an urban park and it was claimed that SANParks has made commitments in this regard. To achieve this, harvested plantations would have to be replanted.

On the opposing view it was strongly expressed that biodiversity conservation should not be sacrificed for shade requirements for recreational uses and the whole area should be rehabilitated to secure the conservation of threatened vegetation types.

Response: SANParks has an obligation and mandate to ensure biodiversity conservation especially of endangered and threatened species. Special emphasis is placed on the Cape Floral Region World Heritage Site of which TMNP forms a critical part. SANParks however acknowledge the need to provide for recreational activities traditionally undertaken in the Park due to its urban setting.

As such, SANParks will strive to accommodate the recreational users to a level which will not compromise the integrity and viability of ecosystems to be conserved.

b) Pines and fire management

From comments received, differing views were expressed regarding the use of plantations as fire breaks. The one view is that pine plantations should be used as fire breaks whereas the opposite view is that pines are a fire hazard.

Response: The issue of fire management is complex. The draft Management Framework provides for the retention of plantations in line with the felling schedule, for the full 20 year period as they do not pose a high risk under very specific conditions. Given the risk involved, SANParks does not intend to use pines to serve as fire breaks or as a fire management mechanism.

c) Area required for conserving Cape Flats Sand Fynbos (CFSF).

A view was expressed that the Cape Flats Sand Fynbos is sufficiently conserved and only about 15ha should be rehabilitated to ensure the survival of this type of vegetation. An opposing view maintained that CFSF is critically endangered and at least 500ha will need to be rehabilitated in order to ensure the survival of this vegetation type.

Response: The Biodiversity Guidelines published by SANBI, indicate that ideally 500ha of CFSF should be conserved. In the case of Tokai however, only 180ha is potentially available if all the areas representing the soils on which the vegetation occurs, is rehabilitated. This is not possible due to other land uses (e.g. picnic area) and the maximum area realistically available is approximately 100ha. Research indicates that if ecological corridors are maintained and the edge area is restricted to the minimum, a sustainable ecosystem could

be established. This will however require management interventions to prevent species loss. SANParks will thus attempt to conserve as large an area as possible and coordinate with the specialists on rehabilitation of this vegetation type and on the required management actions to minimize potential species loss.

d) Extent of ecological corridors required

The proposal for a riparian and terrestrial corridor in Tokai, was questioned by some stakeholders as they are of the opinion that the riparian corridor in Tokai is sufficient and there is no need for a terrestrial corridor

A counter view was that both a riparian and a terrestrial corridor is needed as it conserves the unique Granite Fynbos-Cape Flats Sand Fynbos ecotone and link which will support the sustainability of CFSF.

Response: Research indicates that both corridors are necessary for the conservation efforts to be sustainable. To achieve the minimum requirements for these corridors pose a challenge as the corridors compete with other uses in a narrow strip. Careful spatial planning will be required to accommodate the corridors and the other uses. The approach will thus be to create both corridors as close to the requirements proposed by the MF Biodiversity Guidelines, as possible.

e) Conservation status of Granite Fynbos

A view was expressed that the conservation status of Granite Fynbos is not high and that *shaded* recreational activities should be allowed in these areas for both Tokai and Cecilia.

The opposing view argues that Granite Fynbos in this area is a special sub-category namely Peninsula Granite Fynbos (PGF), which according to the latest City of Cape Town biodiversity assessment, is critically endangered and needs to be conserved in both Tokai and Cecilia.

Response: As the conservation status of the PGF needs further clarification, SANParks will apply the precautionary approach. Key indicator species of Granite Fynbos, such as the threatened Silvertree, especially in Cecilia Plantation warrant that this 'icon' species deserves conservation. As with most fynbos species, Silvertrees need a healthy ecosystem to survive in the long term. The Management Framework will thus revise the spatial alignment of planted shaded landscapes for recreation and areas of PGF to be rehabilitated in Cecilia. Consideration will be given to providing a shaded link from Constantia Nek to Kirstenbosch.

In the case of Tokai, the objective would be to conserve a sufficient area of this vegetation type in order to secure a viable terrestrial corridor.

f) Conservation status of Afromontane forest¹ and rehabilitation viability

A view was expressed that the conservation of Afromontane forest is not a biodiversity priority and in fact rehabilitation should not even be considered. Rehabilitation of Afromontane on PGF poses a threat to the survival of PGF, as it will prevent / interfere with the fire regime for PGF.

¹ Where this report use the term 'Afromontane' it refers to the potential sub-category Southern Afrotemperate forest

An opposing view is that Afromontane forest should be rehabilitated to its original extent which is greater than its current distribution.

Response: Substantial difference of opinion exists on the original extent of this vegetation type as it was exploited very early during colonisation. A specialist input with a practical approach would be able to indicate areas suitable (and probable historical extent) for Afromontane rehabilitation. The Management Framework will attempt to clarify this as the incorrect impression has been created that all riverine corridors and large areas will be re-established with Afromontane forest to create shade, which is not the case.

g) Effect of clear felling on faunal species (Baboons)

The view was expressed that all fauna has to be protected and that the felling schedule should be delayed to allow species to adapt to the change in habitat.

An opposing view argues that baboons will move back to the mountain when the trees are gone and forage in rehabilitated fynbos. The other species such as grey squirrels and the Black Sparrow Hawk should not be a concern and can be accommodated in suburban areas and the green belts.

Response: Regardless of whether a species is alien or not, the effect of felling would be that they would seek other habitat. The chances are that faunal species such as baboons may rather venture into the urban area than back to the mountain due to feeding opportunities in the urban area with the subsequent problems this may pose. A monitoring program will be put in place for key species to identify unsustainable displacement as soon as possible. When such pattern is observed, mitigating measures will be investigated to address the displacement.

e) Alien vegetation management

One view is that all alien vegetation has to be removed, including the eucalypt stands not indicated in the felling schedule.

In opposition to this view is the case for the retention of some alien exotic trees, due to their heritage and aesthetic value.

Response: Various distinct patches of exotic trees exist, namely eucalypt stands, redwoods, cork oaks and camphor trees. Retention or removal of these trees will be evaluated against a set of criteria.

The Management Framework will indicate in the action tables, that a detailed survey be undertaken, to identify these trees and determine their status in terms of criteria such as aesthetic, heritage and recreational value and potential threat to biodiversity.

2.2.2 HERITAGE

(Refer to Annexure E for detail comments and responses)

a) Heritage status of the plantations vs. biodiversity.

A strong view is held that the heritage status of the plantation landscape is one of high significance. Plantation heritage should thus take precedence over biodiversity.

In opposition to this view, it is argued that the heritage of the natural area, particularly the threatened ecosystems, represents millions of years of evolution and should take priority over the recent history and significance of the plantation.

Response: The heritage assessment undertaken by the appointed heritage specialist, indicates that the plantation represents a productive landscape which, by its very nature, provides for change over time. In the context of the 20 year exit lease, which provides for the phasing out of commercial plantations at Tokai and Cecilia, the remaining planted areas and Arboretum will give spatial embodiment to the plantation landscape and the history of commercial forestry can be acknowledged through education and interpretation initiatives. However, the heritage significance of the critically endangered and irreplaceable ecosystems unique to the area needs to be conserved and recognised as a heritage resource.

2.2.3 RECREATION

(Refer to Annexure F for detail comments and responses)

a) Availability of recreational areas in Lower Tokai

The view was expressed that the area indicated in the draft Management Framework, to remain as plantation and available for shaded recreational purposes similar to the current situation, is not large enough to accommodate the recreational activities.

Opposed to this, is the view that all current recreational activities may continue in the rehabilitated areas and sufficient recreational areas exists within the urban open space system and no further planting in lower Tokai is therefore necessary.

Response: The Management Framework proposals allow for the current recreational activities in Lower Tokai to continue. However, the nature of the landscape will change, by providing a combination of shaded areas and rehabilitated areas (fynbos and riparian). In addition, the local and metropolitan open space and green belt systems provide extensive open space for a range of recreational activities in both shaded and open areas. The concern regarding the loss of a portion of the Tokai picnic area is unjustified as a similar size and character picnic area to the existing will be provided.

b) Extent of area where dogs will be permitted and under what conditions

The dog walking fraternity requested that dogs be allowed in the Arboretum, in Upper Tokai and Cecilia as well as access paths to the higher mountain.

Other users indicated that they do not support the idea of allowing dogs in these areas as this would conflict with existing activities.

Response: Current dog walking arrangements will remain in place and changes will only be effected through the review of the Environmental Management Programme for walkers accompanied by dogs in the Park.

c) The type of trees to be planted for shaded recreation purposes

A view is held that pines are the best suited to accommodate recreation activities and provide the most appropriate landscape qualities and shade for recreational purposes. Therefore

pine trees should be planted to provide shade for recreational purposes as opposed to indigenous trees as they do not provide the same type of shaded recreational environment.

Other stakeholders are however of the opinion that indigenous trees should rather be planted to provide shaded recreational areas.

Response: The answer is not an either or, but rather a site specific response to the requirements of shade in particular areas. For example different mixes of types of shade trees are appropriate to the picnic area as compared to extending the Arboretum or providing shaded walks in lower Cecilia. This may include both indigenous and non-invasive exotic trees and will be determined by further investigation.

2.2.4 ECO-TOURISM AND DEVELOPMENT

(Refer to Annexure G for detail comments and responses)

a) Perceived conflict between eco-tourism and recreation

Some recreational users are concerned that the development of eco-tourism facilities will restrict access to the area for local residents for recreational purposes.

Opposing this is the view that more eco-tourism opportunities should be considered e.g. treetop tours and facilities for mountain bikes.

Response: Eco-tourism facilities will not take areas away from recreational users, but will merely add facilities (such as facilities for mountain bikes, tearoom etc), which will also be available to local residents. The picnic area which is mainly used by locals will remain, although in a re-configured form. Current recreational activities will continue to be permitted in a changed landscape while appropriate facilities for eco-tourism may be expanded.

b) Exiting from plantations will result in job losses

Concerns were expressed that the exiting of the plantations will result in job losses, especially in the lower skilled and income group.

Response: Economic studies indicate that the management of conservation areas and related tourism development create equivalent job opportunities, including lower skilled jobs (alien clearing, tree planting, footpath maintenance etc).

2.2.5 MANAGEMENT AND MONITORING

(Refer to Annexure H for detail comments and responses)

a) SANParks capacity to undertake the rehabilitation

A concern was expressed that SANParks does not have the capacity to undertake rehabilitation and management at the same rate that the plantations are clear felled.

Response: The Management Framework will inter alia assist the management of TMNP to establish the required capacity, plan and budget to provide the capacity. Capacity is furthermore not solely within TMNP but also sourced through other Government funding initiatives such as Working for Water, Working for Wetlands, Working on Fire, DEAT Social Responsibility programme, DEAT Infrastructure programme and other initiatives. TMNP can demonstrate its capacity through successful examples such as the rehabilitation of Orangekloof, Newlands, Silvermine etc.

2.3 LANDSCAPE AND PRECINCT PROPOSALS

(Refer to Annexure I for proposal)

Various spatial proposals were received dealing with detailed planning and alignment of recreational areas, picnic site etc. These proposals will be assessed and based on the above responses to inform the amendment of the draft Management Framework.

2.4 CONCLUSION

The above summary indicates the response to the key issues raised by the I&APs. A wide range of specific and detailed issues were raised and these are responded to in the Annexures.

Based on the submission received and the summary responses above, the draft Management Framework will be reviewed and amended.

3 THE WAY FORWARD

This Comments and Response Report is part of the process to prepare a Management Framework for Tokai and Cecilia. Should anybody be of the opinion that their comments have not been acknowledged in the report, kindly inform Geostratics of such omission. The opinions expressed in the response to comments will be used to assess any changes to be made to the draft Management Framework.

The final Management Framework will be released for public view once it has been accepted by SANParks management.

Contact details:

tokai@geostratics.co.za

or visit the Table Mountain National Park web site at www.tmnp.co.za for documentation and further information.

BIBLIOGRAPHY

Internet references: www.fsc.org.za

Amos, J. 15/12/2006. Care Needed with Carbon Offsets. BBC News, Science.
<http://news.bbc.co.uk/go/pr/fr/-/2/hi/science/nature/6184577.stm>

Barry Standish, Antony Boting, Hugo van Zyl, Tony Leiman Jane Turpie _October 2004: The Economic Contribution of Table Mountain National Park, Graduate School of Business, University of Cape Town

Climate Justice Now! The Durban Declaration on Carbon Trading. www.sinkswatch.org, 10/10/2004.

Fairbanks, D.H.K. & Scholes, R.J. 1999. South African Country Study on Climate Change: Vulnerability and Adaptation Assessment for Plantation Forestry. Center for Geo-Information Science CSIR Environmentek.

Fuggle, R.F., & Rabie, M.A. 1999. Environmental Management in South Africa. Juta & Co, Ltd.

Goudie, A. 2000. 5th ed. The Human Impact on the Natural Environment Blackwell Publishers Inc.

Mills, A.J., & Fey, M.V. 2003. Soil carbon and Nitrogen in five contrasting Biomes of South Africa. S. Afr. J. Plant Soil 2004, 21(2) p 81-90.

SAWAC, South African Water Crisis. Birds & Tree Plantations. *Project supported by the Wildlife and Environmental society of S.A.* www.sawac.co.za/articles/birdsand.htm, 09/01/2007.

SAWAC, South African Water Crisis. Industrial Tree Plantations: A Growing Problem. *Project supported by the Wildlife and Environmental society of S.A.* www.sawac.co.za/articles/industrial.htm, 09/01/2007.

The Royal Society. July 2001. The role of Land Carbon Sinks in Mitigating Global Climate Change. Nature, Vol. 412 p 108.

ANNEXURE A: INDIVIDUAL COMMENTS AND RESPONSES

This section contains the list of comments received with reference to the organisation and/or person and individual responses to each.

Table 1 List of respondents and the codes used in Annexures B to I.

Code	Person name	Organization
1a	Mark Setile	Cool Forest
1b	Mark Setile	Cool Forest
2	Dr.A .Rebelo	SANBI (letter to minister)
3a	Dr.A. Rebelo	SANBI
3b	Dr.A. Rebelo	Private
3c	Dr.A. Rebelo	SANBI
3d	Dr.A. Rebelo	Private
3e	Dr.A. Rebelo	Private
4	Chris Phillips	
5a	Shelley Ruth Wyndham	
5b	Shelley Ruth Wyndham	
6a	John Green	Friends of Tokai Forest
6b	John Green	Friends of Tokai Forest
7	Judy Sole	
8	Jacqui Low	
9a	Nicky Schmidt	
9b	Nicky Schmidt	
10a	Mark Schlesinger	Urban Forest Protection Group/Coolforest
10b	Mark Schlesinger	Urban Forest Protection Group
11	E Strain	
12a	Silvia Brass	Friends of Tokai Forest
12b	Silvia Brass	Friends of Tokai Forest
13a	Suzanne	
13b	Suzanne	
14	Tim O'Hagan	
15	Susan Steyn	DWAF
16a	Robin Boyd	
16b	Robin Boyd	
16c	Robin Boyd	
16d	Robin Boyd	
17	S.R. Davey	
18	Nerina von Mayer	
19	C. Greenwood	
20a	E.A. Glass	
20b	E.A. Glass	
20c	E.A. Glass	Friends Of Tokai Forest
21	A.G. Clarke	
22	Odette Curtis	Percy Fitzpatrick Institute: Raptor research
23	Thokozile Mayer	
24	Jean Stephenson	
25	Pam Newby	

Code	Person name	Organization
26	Peggy de Kock	
27	Philippa Mispion	
28	K. Martinussen	
29	Fran Hunziker	
30	Gavin Lawson	Zandvlei Trust
31	Katharine	
32a	Jane Carter	
32b	Jane Carter	
33a	Greg Mayre	
33b	Greg Mayre	
34a	Paul Stafford	
34b	Paul Stafford	
35	Ken Venn	
36	Nicola Nieburg	
37	Mark Boxall	
38	Sylvia Heijke	
39	Brooke Campbell	
40	Shaun	
41	Sian Stevenson	
42	Raphael Rickettes	
43	Linda Boxall	
44	Taryn Blyth	
45	R. Walker	
46	Corinne + Charles Merry	
47	Dirk Muller	
48	Louis de Villiers	
49	Leon + Fozaih	
	Mathew Prins	
50	Dr J.Z. Przybojewski	
51	Mark Brown	Canopy Tours S.A
52	Dr. A. Rebelo	SANBI
53	Laylaa De Villiers	
54	C.W. Stowe	
55	Dirk Holtes	
56	Mariane Alexander	
57	Laura Robinson	Cape Institute for Architecture
58	S.A. Foley	
59	M.E. Weir	
60	DR P.A. Thomson	
61	Geraldine Goncalves	Friends of the Dog walkers
62	Leslie Hurst	
63	Pat Holmes/Patricia Rebelo	
64	Gail Cleaver	Baboon Management Team
65	Lorraine Gardiner	
66a	Angus Wilson	
66b	Angus Wilson	Urban Forest Protection Group
67	Nadine Gerber	
68	M. Lavies	

Code	Person name	Organization
69	Richard Rosenthal	
70	Anne Mayne	
71	Neil vd Spuy	
72	Sue Davidoff	
73	Erik Soderlund	MTO Pty (Ltd)
74	Nicky Cloete-Hopkins	
75	Mary Sproston	
76a	Sandra Hewitson	
76b	Sandra Hewitson (submitted too late for phase I comments, thus included in this document)	
77	Amina Benjamin	
78	Dennis Ginn	Rustenburg Primary School
79	Liesl Naude	
80	Catherine Calais	
81	Richard Fuggle	
82	Yvonne Wood	Tokai Residents Association
83	Anna Buchanan	
84	Reinhardt Stompe	
85	Prof John Morris	Tokai + Cecilia Forest representative Ratepayers Committees
86	Tim Hagen	
87	Mark Schlesinger	
88	Eugene + Alice Moll	
89	Liz Brunette	Constantia Hills Residents Association
90	Jackie Davies	
91	Sandy Barnes	Friends of Silvermine Nature Area
92	M.R. King	
93	Morne du Plessis	
94	Barbara A. Blyth	
95	Chinaman Melani	Chemical, energy, paper, printing, wood and Allied workers
96	Stephan Granger et al	City of Cape Town
97	Meurant Botha	Pedal Power (Mountain Biking)
98	Rosemary Berry	
99	Hugh Berry	
100	P.C. Teale	
101	Debbie Schafer	
102	Liz Day	
103	Jihad Jhaveri	

Inputs via meetings and interviews:

104	Urban Forest protection Group
105	Parkscape
106	Percy Fitzpatrick Institute (Morne du Plessis, Odette Curtis)
107	City of Cape Town
108	WC: Dept of Transport and Public Works, Property Management
109	Friend of Tokai forest
110	SANBI

ANNEXURE B: Process, Public Participation and Principles

Process, Public Participation and Principles

Comment	Response
<ul style="list-style-type: none"> • Consultation should have taken place before the plantations were sold to MTO to harvest and the land assigned to SANParks. 23, 60, 83, 87, 76 • Timber contractors have already felled large sections of plantation with no intention of replanting, and now they have an “open day” to ask for suggestions when the damage has already been done. 16a • Although it is acknowledge that it is not within the brief of the consultants to review the exit strategy, consideration should be given to extent the 20 year period to a 50 year period. 66b 	<ul style="list-style-type: none"> • The sale of the standing timber by public tender and the subsequent MTO lease was put in place by DWAF as part of its process of exiting from commercial plantations. The 20 year lease period was negotiated by Ministers of DEAT and DWAF. SANParks was then assigned the lease in terms of the Cabinet resolution of 1997 that all public land within the CPPNE, a declared nature area, be brought under management of SANParks to establish the CPPNE as a National Park. This aspect has already been explained in length in all previous documentation.
<ul style="list-style-type: none"> • Not enough consultation undertaken with stakeholders to obtain their input, too little time was allowed and I&AP’s comments are ignored. 1b, 4, 12a, 12b, 14, 60, 81, 85, 86, 76 	<ul style="list-style-type: none"> • Sufficient opportunity was allowed for input and comment. The initial intent and request for I&AP’s to register was advertised in local and regional newspapers, flyers distributed and notices posted in Tokai and Cecilia. SANParks is confident that it can demonstrate that sufficient adverts and notices were posted in appropriate media to inform the public of the process. Open Days, workshops, meetings were held and follow up documentations made available for comment in local libraries, the SANParks website and offices. The comment period for the Draft Management Framework has been extended from 30 days to 60 days, which provided sufficient time for input.
<ul style="list-style-type: none"> • The FOTF fully support the current public participation process to develop a Management Framework and despite severe reservations about the conditions of the lease, for the purpose of this exercise, accept that these conditions are a given. 6b 	<ul style="list-style-type: none"> • Noted.
<ul style="list-style-type: none"> • The workshop was informative 20d 	<ul style="list-style-type: none"> • Noted
<ul style="list-style-type: none"> • BMT supports the current public participation process to develop a Management Framework for the Tokai area and wishes to recognize the incredible amount of work the consultants have done and the care taken to bring together a wide range of requirements (often conflicting) in a workable solution for all concerned. 64 	<ul style="list-style-type: none"> • Noted.
<ul style="list-style-type: none"> • The views of users of the plantations should be sample surveyed before the process and not after. 66b 	<ul style="list-style-type: none"> • The 2001 TMNP Visitor Survey was used to inform the planning taking into account the fact that changes in numbers and attitudes



ANNEXURE B: Process, Public Participation and Principles

Comment	Response
	<p>over time is possible. Statistics kept by the Tokai managers were used to supplement the 2001 survey, and thus planning was not done in the absence of any understanding of user groups, numbers or requirements. The Management Framework supports the notion that regular follow up surveys should be undertaken with more emphasize on specific areas and uses.</p>
<ul style="list-style-type: none"> There should be ongoing public participation in order to ensure accountability not only to environmental biologists, but also to those who are knowledgeable with respect to aesthetics, recreational and other broad public purposes. 69 	<ul style="list-style-type: none"> The Management Framework proposes ongoing (every 5 years) update and this update will be done in consultation with stakeholders. In addition, there will be various levels of consultation for the preparation of more detailed, lower level and implementation plans flowing from this broad level Management Framework (e.g. precinct plans, picnic area plan, biodiversity plans etc).
<ul style="list-style-type: none"> TMNP cannot be managed as other national parks as it is an urban park. It provides open space for recreational purposes for the citizens of Cape Town. 9b, 13b, 28, 54, 59, 60, 83, 87, 76 The promises by SANParks to put people first were to the effect that the National Parks Board (as called then) would not seek to impose on the Cape Peninsula the primacy of nature conservation values such as used for managing other SA National Parks. If these assurances had not been given it is probable that neither the Regional Services Council nor the City of Cape Town would have acceded to land under their control being assigned to national parks management. 81 	<ul style="list-style-type: none"> SANParks has acknowledged that TMNP is an 'urban park'. This should not be confused with an urban open space. It does not mean that the TMNP is a public open space with the primary intention for recreation and urban greening. It merely indicates that SANParks acknowledge that TMNP is a national park located within the boundaries of an urban area and as such requires a different approach than e.g. Kruger National Park which is reflected in the Park Management Plan. The proclamation of a national park did put conservation at the forefront with the commitment to still accommodate recreation in the urban context. There is not commitment on record of managing the Park as an urban open space with recreation as the main objective.
<ul style="list-style-type: none"> There is no reason why there cannot be a compromise between people needs and biodiversity. 9b, 20d, 54, 59, 66b, 81, 101 Whilst the wishes of the people to retain areas to walk under the shade of pines on a hot summers day is understandable, such a demand is not reasonable in relation to the compromise that would be needed for such endangered biodiversity as occurs in Tokai/Cecilia. As a rule, people are resistant to change and cannot visualize the area without pines. Even with the current exit policy, there will be large tracts of pines for another 20 years in Lower Tokai. People generally adapt to a changing environment. 63 Environmental management must place people and their needs at the forefront of its concern and serve their physical, psychological, 	<ul style="list-style-type: none"> The draft Management Framework proposed a compromise between biodiversity, recreation and heritage. If no compromise was intended the recreational activities would have been removed for the sake of biodiversity. The draft Management Framework provides for recreational activities in a variety of landscapes whilst preserving unique vegetation types and ecosystems the needs of people are in fact at the forefront. It is not about species survival but about survival of a particular vegetation type and ecosystem within a nationally proclaimed conservation area where a unique opportunity exists to critically threatened vegetation types. The sacrifice of pine plantations for

ANNEXURE B: Process, Public Participation and Principles

Comment	Response
<p>developmental, cultural and social interest equitably. 84, 76</p> <ul style="list-style-type: none"> The Management Framework represents an impressive attempt to draw together the range of issues being brought to bear on these important biodiversity and recreational areas. Pressures from a range of interest groups have been recognised in the Management Framework which has largely succeeded in achieving a rational balance between competing imperatives. 96 There is a growing international literature, fuelled by climate change scenarios, which is beginning to promote human survival rather than simply conserving biodiversity. Just how important globally is the loss of a few species here and there? After all that is what the millennium seed bank project is all about. 88 	<p>threatened vegetation types is not going to threaten human survival.</p>
<ul style="list-style-type: none"> The proposals will change the character of the area where people may have bought properties purely because of its leafiness. 1b, 16b, 23, 80, 87 People from all over the world visit the “Fairest Cape”, which is associated with trees. 16a, 83, 84 The plan refers to envisioned landscape proposals but do not take cognisance of the existing unique landscape. The removal of the plantations will result in the ruin of the aesthetic appeal of the Constantiaberg Valley. 9b The Management Framework does not consider the affect of removing the trees permanently on those who will be deprived of a local environment that adds value to our lives. 92, 76 Trees and leafy green spaces are essential to human social and psychological well being. These spaces have been proved to lower crime rates as people cope better with everyday stress and hardship. 76 	<ul style="list-style-type: none"> The landscape will be changed but the extent of the change needs to be understood. Plantations are productive landscapes which by their nature have in the past and will in the future change over time. The changes to the landscape will not be sudden but phased in incrementally over 20 years. This flows from the Government decision to phase out plantations at Tokai and Cecilia. Sir Francis Drake declared Cape Town the “fairest cape’ in the 1700’s long before the plantations existed and thus is not related to the plantations. The urban neighbourhoods and urban open space systems are densely treed, most gardens in the area are fairly large and contain long established trees. The views from most of the neighbourhoods towards Tokai and Cecilia are limited by urban structures and garden planting. The Park will continue to provide for human well being.
<ul style="list-style-type: none"> The original and unanimously supported notion that biodiversity values should be paramount in “remote” areas, and that values which recognised and permitted leisure activities and recreation to be paramount in “leisure” zones, has been disregarded in the TCMF (and the CDF). The consequence of this is that the primacy of biodiversity values, entirely appropriate for certain areas of the peninsula is now being imposed on all areas over which SANParks have been given management authority. This effectively negates the 	<ul style="list-style-type: none"> In the case of Tokai and Cecilia, SANParks will fail in its duty if the biodiversity objective is not put at the forefront. This does not mean that SANParks does not consider recreational activities important, but that in this specific instance, biodiversity will outweigh recreation in order to ensure long term health for both the environment and people. The main principle of the CDF is the setting of limits of acceptable change. Leisure zones do not give carte blanche for any activity, but

ANNEXURE B: Process, Public Participation and Principles

Comment	Response
<p>importance of certain zones for the leisure and recreational activities of the citizens of Cape Town. 81</p> <ul style="list-style-type: none"> • The fact that the very important role that parts of the Peninsula play in the leisure and recreational activities of Capetonians is not properly recognised is directly at odds with the SANParks claim that its principles for decision making and action will “Manage with humility the systems under our custodianship, recognizing and influencing the wider socio-ecological context in which we are embedded.” The original intent of different primary objectives in the different functional zones of the peninsula should be honoured: biodiversity taking precedence in remote and wilderness areas and recreation and leisure activities taking precedence in the proposed high and low leisure zone. 81 	<p>merely set the limits within which that activity can be exercised within a specific area, based on the capacity level of that area. In the case of Tokai and Cecilia, the importance of biodiversity conservation will change the capacity level of certain areas. This should however be understood in the context of the wider open space system where it is the role of City Open Space to provide for higher intensity recreational areas. The Management Framework intends accommodating all existing activities, but will affect intensity levels in different areas. The CDF zonings do not intend for leisure to take precedence in any zones, but merely at what level in relation to biodiversity as baseline, this will be managed.</p>

ANNEXURE C: Management Framework Format and Issues

Management Framework Format and Issues

Comment	Response
<ul style="list-style-type: none"> Various specific comments re additions to objectives and action tables. 93, 6b, 64, 102, 71 	<ul style="list-style-type: none"> To be considered in review of the Management Framework
<ul style="list-style-type: none"> The Management Framework should plan for massive growth in the recreational use of the areas. 6b, 97 	<ul style="list-style-type: none"> The Management Framework does attempt to deal with the potential growth in appropriate eco-tourism activities but this growth will need to be limited so as not to compromise recreational activities.
<ul style="list-style-type: none"> The statement that the Management Framework is not a fixed document which, obviously leave SANParks with the freedom to make amendments without public consultation, is a concern. 83, 71 	<ul style="list-style-type: none"> The Management Framework is a broad level framework for planning and like any planning document dealing with a long term vision of 20 years or more allows for revision. This is not a new concept. The Management Framework also provides clear reasons for this regular (5 yearly) revision. Revision however has to go through a certain process and SANParks will consult when the 5-yearly revisions are undertaken. SANParks will also consult around the preparation of the various more detailed; lower level plans flowing from this framework (e.g. precinct plans, landscape plans, biodiversity plans etc).
<ul style="list-style-type: none"> The Management Framework should include a section setting out the underlying principles and all proposals and actions should be measured against these principles. 93 	<ul style="list-style-type: none"> The principles underlying the Tokai and Cecilia Management Framework, as for any other framework or plan prepared for the Park, are set at a Park level through the Park Management Plan. These were set through public process in the preparation of the original Park Management Plan in 2000 and its review in 2006. However, these can be more explicitly integrated in the revision of the draft Tokai and Cecilia Management Framework.
<ul style="list-style-type: none"> The vision statement should provide a broader vision for the area as the current statement relate more to objectives. 93 	<ul style="list-style-type: none"> Noted to be considered.
<ul style="list-style-type: none"> Support the vision statement. 6b 	<ul style="list-style-type: none"> Noted.



ANNEXURE D: BIODIVERSITY

The tables below contain the comments received dealing with various biodiversity issues. The comments were grouped according the specific biodiversity issue for clearer understanding and response. The following broad issues are dealt with:

- 1 Conservation Priority
 - 1.1 General
 - 1.2 Cape Flats Sand Fynbos
 - 1.3 Peninsula Granite Fynbos
 - 1.4 Afromontane
 - 1.5 Riperian Zones
- 2 Conservation Targets:
 - 2.1 General
 - 2.2 Cape Flats Sand Fynbos
 - 2.3 Peninsula Granite Fynbos
 - 2.4 Afromontane
- 3 Viability of rehabilitation
 - 3.1 General
 - 3.2 Cape Flats Sand Fynbos
 - 3.3 Afromontane
- 4 Ecological Corridors
- 5 Fauna Management
- 6 Other

1 Conservation Priority

Comment	Response
1.1 General	
<ul style="list-style-type: none"> • The need for a shaded recreational facility in these suburbs far outweighs the reasoning for removing the pines. There are numerous plantations on the mountain where mountain fynbos could be re-established long before the need to clear Tokai. 58 • Two percent shaded landscape is not enough. 5-10% of the mountain should be retained as forests, ideally as indigenous but where it won't grow. The proposals of the Urban Forest Protection Group can be used. It seems that the proposed removal of these forests in their entirety results from a minority, who contend that the entire area must be arbitrarily returned to its pristine condition prior to the arrival of European plantings, which have over the intervening centuries acquired enormous ecological and aesthetic value. 87, 94, 69, 16c 	<ul style="list-style-type: none"> • SANParks primary mandate is the conservation of biodiversity and has a national and international obligation to ensure the survival of threatened species and ecosystems. Where uncertainty exist regarding the exact status of the conservation priority of a specific species or ecosystem, the precautionary principle will be followed with the proviso that such decision be informed through further research.

ANNEXURE D: BIODIVERSITY

Comment	Response
<ul style="list-style-type: none"> • Non-invasive aliens are contained within the plantations and with minimal management will remain contained. 9b • In light of the information contained in the document and, in spite of substantial loss of freely useable recreational areas, the FOSNA supports TMNP's strategies, actions and timeframes to restore critically endangered Sand plain fynbos, endangered granite fynbos, Afromontane forests, freshwater systems and the linking of wetlands with the city's open space systems. 91 • The management must first and foremost comply completely with the minimum ecological requirements for the conservation of these threatened ecosystems and any indigenous threatened taxa within them. We live in a mega disaster area: Cape Town has 9 out of 21 critically endangered vegetation types in South Africa. It is incumbent on the City of Cape Town and TMNP to ensure that every effort is made to preserve each and every potential patch of these national and international priorities, and the threatened species that live (and use to live) within them. The seed banks at Cecilia and Tokai are national and global treasures and should be treated accordingly and restored to its full glory. It is our responsibility to the plants, to our local pride, to our national obligations, to our international commitments and to our Creator. Our flora, our kids, our heritage and our consciences demand nothing less. 3d 	<ul style="list-style-type: none"> • Restoration of ecosystems is not about returning to an idealised pristine state but rather about allowing natural pattern and process to occur – a very different, realistic and important objective. • Whilst biodiversity conservation and thus rehabilitation is of high priority, the continuation of recreational activities is acknowledged. Recreational activities should thus be accommodated without jeopardising the integrity of conservation.
<ul style="list-style-type: none"> • It must be realised that the only place where Peninsula Granite Fynbos and Cape Flat Sand plain Fynbos meet in the Tokai precinct. This ecotone is therefore unique and of high conservation significance. 96 	<ul style="list-style-type: none"> • Noted
<ul style="list-style-type: none"> • There is no bio-diversity reason why Cecilia plantation should be felled at all. 84, 60 	<ul style="list-style-type: none"> • The lease makes provision for the Cecilia plantation areas to be harvested. Due to the conservation priority of the threatened Peninsula Granite Fynbos, sufficient areas of this vegetation type can therefore be rehabilitated which will also see the return of the silver tree. Indications are that significant Afromontane habitats exist in this area, which can also be successfully rehabilitated.

Comment	Response
<ul style="list-style-type: none"> Both CFSF and PGF are threatened indigenous vegetation types which also contain threatened amphibians, reptiles, birds, mammals, insects (including butterflies) and fish. As signatories to the Rio Convention we have a national obligation to ensure that these floristically rich, threatened vegetation types are adequately conserved. We agree that the core objective of Cabinet when it assigned the Tokai and Cecilia plantations to SANParks was to manage conservation worthy land in the national interest. The key is undoubtedly the rehabilitation of threatened and endangered ecosystems and restoring them for the benefit of future generations. The TMNP would be failing in its duty if it did not make biodiversity the number one priority. 2, 47 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> The entire Tokai area of the TMNP and the adjoining Porter Estate on the slopes of the Constantiaberg comprise the catchments basin for Prins and Prinseskasteel series of streams and seeps which link via the Soetvlei to eventually feed the Sandvlei Estuary. This system, already acknowledged as being of unique national value, could also be unique in international terms. Reference is made in the Draft Management Framework to using the <i>Source to the Sea</i> management framework. It is imperative that that this whole system, regardless of man-made land ownership boundaries is treated as an integrated system, which forms the backbone spine of the Management Framework. 6b Start has been made to resuscitating the lower section of the Soetvlei Wetland in Compartment A17b. FOTF recommends high priority in the Management Framework to bring this area under TMNP stewardship and high priority to the development of partnership programmes 6b 	<ul style="list-style-type: none"> This objective is accommodated in the Management Framework.
<p>1.2 Cape Flats Sand Fynbos</p>	
<ul style="list-style-type: none"> The endangered fynbos is one of the main reasons for your proposal to eliminate all the pine plantations but surely a compromise can be reached? The plantations on the mountainside of Alphen Road can be used for this purpose and the corridor on the lower Tokai forest, which has already been cleared. This would provide an acceptable compromise. 59 It is claimed that this fynbos is endangered; Brett Myrdal even claims it exists only in the soil of Tokai forest, but I read that Sandplain fynbos also grows in the lower Bergriver region, in the Renosterveld region and Namaqualand. Why can't the survival of these plants be secured there? 84 The latest analysis of remaining remnants done by the City indicates that only 17% or 9392 ha of CFSF remains, of its former distribution of 54654 ha. Less than 1% is formally conserved, thus this vegetation type is a top priority for conservation. The pine plantations 	<ul style="list-style-type: none"> Cape Flats Sand Fynbos is a sub-category of Sand Fynbos (also known as acid sandplain fynbos). This sub-type only occurs in the Cape Flats or lowlands and has been removed by urban development. This sub-type differs significantly from other Sand fynbos and hosts endemic species. The conservation status of this vegetation type is critically endangered and SANParks accepts its national and international mandate and obligation to formally conserve & restore as much as possible. Refer to paragraph 2.3. for

Comment	Response
<p>should be exited and the areas restored, as was the original intention in ceding the land after harvesting to the Table Mountain National Park (TMNP). This is an unparalleled opportunity to conserve a little more of this once widespread Cape Town vegetation type, which is now so critically endangered. 63</p> <ul style="list-style-type: none"> Given the biodiversity importance (i.e. compositional importance) of the Sandplain fynbos, little justification can be made for not restoring almost every possible hectare back to Sandplain fynbos. Thus, shaded forest, and even sections of the picnic area might strictly need to be returned to Sandplain fynbos vegetation. 93 The Tokai Plantation has been identified since 1997 as one of the Core Flora Conservation Sites on the Cape Flats. Cape Flats Sand Fynbos has 74 threatened plant species in the 1997 Red Data List, and 6 extinct species. This is 10% of the extinct species in the country! These figures will change when the 2006 Red Data List assessment is completed, and can be expected to be almost double! Other than the Kenilworth Racecourse, there is no other viable area to conserve this vegetation type in the southern metropole. 2 During the Cape Action Plan for the Environment (CAPE) Framework for a conservation plan for the Cape Floristic Region the veld type (as Blackheath Sand Plain Fynbos) was recognized as totally irreplaceable. 3c The restoration of this area is non-negotiable. It is the hottest of hotspots and contains an inordinately large number of red-data species. This is literally our last chance to conserve what little we have left. 47 	<p>SANParks' approach in this regard.</p>
<p>1.3 Peninsula Granite Fynbos</p>	
<ul style="list-style-type: none"> No one has as yet mentioned the southern production part of the Kirstenbosch Gardens being allowed to go back to Granite fynbos, and I am sure that a good argument can be made for this. 88 Given the relative intactness of a large proportion of granite mountain fynbos, a case could probably be made for the retention of shaded forests (or even forestry activity) in the lower-lying areas of this vegetation type. However, I would only argue this if it can be shown that retention of forestry activity on the lower slopes of the mountain does not adversely affect the ecosystem functioning of the lower-lying Sandplain fynbos. This is a critical debate, because in effect it would (for Tokai) mean the difference between advocating total clear felling in the granite fynbos area (as the current framework suggest) and allowing contract forestry to continue in the strip above the Arboretum, say up to Level 3! 93 The remaining Peninsula Pine plantations occur on Cape Flats Sand Fynbos, which is Critically Endangered, and Peninsula Granite Fynbos, which is endangered according to 	<ul style="list-style-type: none"> SANParks acknowledge that there is still a debate regarding the exact status of this type of vegetation, but subscribes to the precautionary principle and will prioritize the conservation of this vegetation type, but also encourage further research to inform this decision. SANParks acknowledge the importance of the Silvertree, not only in terms of biodiversity conservation, but also as a local "icon" and will promote the re-establishment and conservation of an environment which can sustain these trees.

Comment	Response
<p>the 2004 National Spatial Biodiversity Assessment (NSBA). Peninsula Granite Fynbos also contains Red Data List species. Examples include the Silvertree, <i>Leucadendron argenteum</i>, and the extinct Wynberg Conebush, <i>Leucadendron grandiflorum</i>. Recent approval for vineyards high up on Vlakkenberg, and urbanization at Stonehurst, has seriously impacted on this vegetation type. City of Cape Town Biodiversity Prioritization Project (2006) lists South Peninsula Granite Fynbos (that found on the south and east slopes of the Mountain) as Critically Endangered. Cecilia and Tokai represent the last chance to acquire land in these vegetation types for conservation purposes. Since SANParks is collaborating with the City in achieving local conservation goals, it should also adopt this categorization for the veld type. 2, 3c</p> <ul style="list-style-type: none"> • The lowermost slopes of Cecilia are the most threatened portion of South Peninsula Granite Fynbos and must be restored to Granite Fynbos, and not converted into inappropriate Afromontane Forest or pine plantation. 3c • The lowermost altitude zones of South Peninsula Granite Fynbos are the least represented in the conservation network and thus the highest priority for conservation. It is thus not acceptable that the entire lower altitudinal zone be allowed to remain as a shaded landscape. At least a minimum of 2/3 of the linear extent should be converted to Fynbos right down to Rhodes Drive. The Cork Oaks could be retained as a visual screen, and also as a shaded walkway for those wanting a shaded walk, while effectively functioning – together with Rhodes Drive – as a fire belt protecting suburban Constantia. 3c • The fynbos in Cecilia is not threatened so why remove trees? 60 	
<p>1.4 Afromontane</p>	
<ul style="list-style-type: none"> • Both the National Spatial Biodiversity Assessment and the more detailed Cape Town City Biodiversity Prioritization Project (2006) clearly show that there is no significant indigenous Afromontane Forest within Granite Fynbos in Cecilia and Tokai. The small patches that exist are restricted to isolated kloofs in Sandstone Fynbos and would never have extended beyond them because of fire dynamics. 3c, 60 • There are some important, high potential restoration, pockets of dry Afromontane forest in the kloofs such as the Prinsesskasteel and Donkerbos, which are very different from the wet Afromontane forests of Newlands. Expansion of these forest pockets should be given high priority in the Management Framework. However it is obvious that these pockets cannot provide shaded areas for high impact recreation activities like mountain biking and horse riding. 6b • Degradation of riparian Fynbos to Afromontane* has already extensively occurred at De Hel, Klaasenbosch and Orangekloof. As a consequence of this, Peninsula Granite Fynbos is more threatened than the transformation data from NSBA and the City evaluations 	<ul style="list-style-type: none"> • SANParks will identify areas suitable for the restoration of Afromontane forest, based on evidence of historical distribution and current viable locations. SANParks will seek to avoid rehabilitating areas not suitable. This effort should not be confused with the tree planting initiatives to create shade and for the expansion of the arboretum.

Comment	Response
suggests. 3c	
<p>1.5 Riparian Zones</p>	
<ul style="list-style-type: none"> The focus on the rehabilitation of the river and wetlands in Tokai is strongly supported. It is important that this, too, is integrated with planning for people through the use of boardwalks and interpretive signage. 96 Riparian zones are a major issue, especially the lowermost riparian zones. Especially in Granite and Sand Fynbos these are the most sensitive and least represented habitats within these ecosystems. Afromontane forest is not appropriate in this area. 3c, 47 	<ul style="list-style-type: none"> The Management Framework does not propose the rehabilitation of Afromontane Forest [Southern Afrotropical Forest] at inappropriate locations. The lower riparian zones differ from the upper valleys and will be dealt with as such. All freshwater corridors to be rehabilitated to appropriate riparian vegetation, and not converted to Afromontane Forest.

2 Conservation Targets:

<p>2.1 General</p>	
<ul style="list-style-type: none"> The TMNP's primary function is nature conservation and the protection of biodiversity. This goal has to be achieved in the environment in which the park is situated. The existence of a forestry sector does not exclude achieving conservation goals. Responsible forestry coexists under independent environmental scrutiny with conservation, recreation, socio-economic and cultural heritage concerns. 73 Even if every square metre of this veld type at Tokai were to be conserved, it would be insufficient to meet national targets: consequently all biodiversity incompatible land or recreational use should be excluded from the area. 3c Seeps or stream channels which have their source in the vineyards of the surrounding farms and the Porter Estate need to be incorporated into the Management Framework as much as the ones which flow from source through the TMNP. In particular it is critical to include the seeps and channels which link the newly resuscitated Granite fynbos area in compartments C2 and 3, flow through Porter and then seep through compartments A9a and A9c. Also the seeps from Buitenverwachting and Uitsig which should flow both north and south of the Stone Church through A7c via culverts under Orpen Road to feed the headwaters of the Soetvlei should receive priority attention. As well as being critical to the entire catchment system, these areas are critical ecological corridors (see Section 4). 6b 	<ul style="list-style-type: none"> SANParks will align the required targets for the conservation of each vegetation type based on SANBI priority framework. Due recognition of the recreational requirement to a level which will not compromise the integrity of the ecosystem is required. The draft Management Framework attempted exactly this, but SANParks will reassess this spatial delineation during the amendment of the Draft Management Framework.
<p>2.2 Cape Flats Sand Fynbos</p>	

ANNEXURE D: BIODIVERSITY

<ul style="list-style-type: none"> • The park is already 44,000 ha. It is questioned why 1000 ha forests have to be eradicated to ensure long-term survival of sandplain fynbos when only 15 ha is needed. 84, 83 • A small area of 30 ha of conserved CFSF, as recommended by the FOTF is too small to sustain the full range of natural ecosystem processes that are required to restore and maintain this vegetation type long-term. Smaller units of vegetation require much more intensive management in order to compensate for the loss of ecological functioning and the increased edge effects, unless these vegetation units are embedded in a larger unit with similar ecological requirements. Lower Tokai is already a fragmented area, thus it is important that the corridor linking it to the mountain fynbos vegetation types is secured and is of sufficient size to increase the contiguous remnant dimensions. 63 • As stated in our first report we agree to the permanent clearing for the conservation of critically endangered Cape Flats Sand fynbos. The proposed area of 30ha appears to be excessive in view of the small, 20x20m, colony of Diastela proteoides and the uncertainty of how successfully it will re-establish itself. Possibly initially setting aside a smaller area with which could be enlarged later if necessary would be more practical. There is concern among the public at the present large area of weed infested open area where the colony is to be established. 66b • The 30 ha are an urgent and temporary minimum goal. It is not “in total to be sustainable” it is “as soon as possible to allow any chance of sustainability.” There is much in the literature that 500 ha are the minimum area required for a sustainable ecosystem practices and 100 ha is required as a minimum for intensively managed ecosystems, linked to other systems by corridors. The only way to achieve this is to convert every available portion back to Cape Flats Sand Fynbos, while at the same time maintaining ecological integrity with viable corridors to the mountains in the west and the riparian habitats and proposed conservation corridors linking Die Oog and the Zwaanswyk Wetlands in the east. Attempts should be made to incorporate City open space on the north side of the Soetvlei Wetlands as one management unit. 3c, 3d 	<ul style="list-style-type: none"> • The TMNP is 23 200 hectares in extent, the target area, comprising the conservation worthy areas of the Cape Peninsula Protected Natural Environment (CPPNE) is 28 400 hectares. There were only 600 hectares of plantation in the 1000 hectares comprising Tokai and Cecilia. • The Biodiversity Guidelines published by SANBI, indicates that ideally 500ha of CFSF should be conserved. In the case of Tokai however, only 180ha is potentially available, should all the areas representing the relevant soils be rehabilitated. This is not possible due to other land uses (e.g. picnic area) and the maximum realistically available is approximately 100ha. Research indicates that if ecological corridors are maintained and the edge area is restricted to the minimum, a sustainable ecosystem can be established. This will however require management interventions to prevent species loss. SANParks will thus attempt to conserve as large an area as possible and coordinate with the experts on rehabilitation of this vegetations type on the required management actions to minimize potential species loss.
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2.3 Peninsula Granite Fynbos

<ul style="list-style-type: none"> • Although sufficient remnant area remains of “Endangered” PGF to meet National conservation targets, insufficient remains to meet City conservation targets. This “Southern Peninsula” form of Granite Fynbos is thus considered “Critically Endangered” at the local City level. The latest analysis of remaining remnants 	<ul style="list-style-type: none"> • As the status of the conservation of PGF may still be debated, SANParks will subscribe to the precautionary principle that until further research show differently this type of Granite Fynbos is
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done by the City indicates that only 41.7% or 3826 ha of PGF remains, of its former distribution of 9179 ha (remaining remnants includes degraded PGF under pine plantations). Restoring PGF to fynbos following pine harvesting should thus be an important goal of the MF. This vegetation type forms the link between the Peninsula Sandstone Fynbos of the higher mountain areas and the CFSF of the lowlands and is an important vegetation type in its own right. The conservation status and target statistics refer equally to Cecilia for this vegetation type. The aim for Cecilia should be to restore the former glory of this Silver Tree ecosystem following plantation harvesting. This will require appropriate burning treatments and weed control. 63

- Cecilia can be treated as an urban recreational area with contract forestry activities that continue, but with broad margins on the natural watercourses. 93
- Forestry activities at Cecilia do not need to be extensive other than for retraction out of watercourses, and from steeper higher lying areas. The Draft Framework's proposed situation for 2010 is in all probability where things should end. In Cecilia there is likely to be little gradient effects as there is no link-up with important lower lying areas. 63
- In Cecilia, the plan to retain (or replant) shade trees up to the contour path should be modified by breaking up portions to allow for the restoration of viable nodes / corridors of the threatened Peninsula Granite Fynbos. This will also provide view sheds of the mountain for walkers. The loss of shaded landscape on the lower slopes to accommodate this important biodiversity imperative could be offset by the provision of shaded landscapes along walking trails above the contour path. 96
- The area is prime Silvertree (*Leucadendron argenteum*) habitat. *L. argenteum* is an endangered species and has lost several populations by developments over the years. One of the threats to the species is fire exclusion which is resulting in its habitat being replaced by secondary and unnatural Afromontane Forest. It is unacceptable that a population of this endangered species be compromised: it is one of the charismatic and flagship species for the Table Mountain National Park. In Cecilia the most important areas regarding the preservation of Granite Fynbos are relatively low down. These areas are mostly reserved for shaded landscapes. We suggest that at least 10% of this area be reserved for granite fynbos. The Silver tree used to grow in abundance on these lower slopes. Although it is common on the sites where it exists, it must not be forgotten that this tree is a Cape Peninsula endemic. 3c, 47
- Concessions can be considered in the higher lying granite fynbos areas in Tokai. 93

considered 'Critically Endangered'.

- In the light of the comments submitted on lower Cecilia, the draft Management Framework proposals will need to be reviewed. The Silvertree is an "icon" species and in addition to the conservation of the Peninsula Granite Fynbos in this area, deserves to be conserved and rehabilitated. As with most fynbos species, Silvertrees need a healthy ecosystem to survive long term. The Management Framework will thus revise the spatial alignment of planted shaded landscapes for recreation and areas of PGF to be rehabilitated in Cecilia. The need to create a shaded link between Constantia Nek and Kirstenbosch will have to be investigated.
- In the case of Tokai the objective would be to conserve a sufficient area of this vegetation type in order to sustain a terrestrial corridor.

2.4 Afromontane

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| <ul style="list-style-type: none"> • No trees (pines) should be felled until Afromontane plantations are established in place of the pines on the other 97% land available already. 98 • Southern Afrotperate Forest communities will only establish successfully in fire-protected sites, such as deep kloofs. The fynbos communities present at Tokai are of far greater conservation importance than Southern Afrotperate Forest, thus fire exclusion should not be entertained as a means of trying to establish forest in these lower slope and lowland riparian zones. 63 • “Re-establishment” of Southern Afrotperate Forest in Cecilia: much of the area indicated as suitable for establishing forest would have burned historically and therefore would not have supported forest (which is a Least Threatened vegetation type) but rather Endangered Peninsula Granite Fynbos. The proposal is thus not one of re-establishment, but one of expansion of indigenous forest. Pockets of Southern Afrotperate Forest would have occurred in the steepest ravines, under cliffs and on boulder scree, all of which offer protection against fires. The historical fynbos vegetation is of far greater conservation importance than the forest. Specimens of Southern Afrotperate Forest trees should rather be planted in the disturbed ground earmarked for the Arboretum expansion. 63, 47 • Support planting of Afromontane forest in the presently overgrown riverine areas as well as the northern section of Cecilia where there is a strong growth of indigenous species under the mature pines. The proposed area of 87ha is optimistic for this section and a proper soil moisture gradient investigation needs to be done to assess the extent of rehabilitation. 66b • We understand the term 'rehabilitated shade' to mean areas of Afromontane forest which have been enlarged by natural regeneration or planting. We have doubts about exposing the sensitive Afromontane forest to the heavy walking traffic currently using the plantations. In reality therefore the amount of shade areas provided for in the plan will be little more than 112ha, a large portion of which is made up of the picnic area leaving precious little for walkers, horse riders and dog walkers. 66b, 98 • As already mentioned Afromontane is the least threatened of the fynbos systems. 47 • Afromontane forests are important both in Tokai and Cecilia with both areas having a number of indigenous forests along the stream banks. These should be expanded but only where the soil moisture during the dry summer months is adequate. It is unrealistic to expect the total area under the pines to be replaced | <ul style="list-style-type: none"> • SANParks has no intention of creating 'Afromontane plantations' but will only restore this vegetation type where it is believed have naturally occurred. • Much difference of opinion exists on the original extent of this vegetation type as it was exploited very early during colonization. • A specialist input with a practical approach would be able to indicate areas suitable (and probable historical extent) for Afromontane rehabilitation. The Management Framework will attempt to clarify this, as the impression exists that all riverine corridors and large fynbos areas will be re-established with Afromontane, which is not the case. |
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with indigenous species. Even the harden species such as Boekenhout, Wildpeach and Keurboom will not form a shady canopy as provided by the mature pines. 59

3 Viability of rehabilitation

3.1 General

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| <ul style="list-style-type: none"> • If the fynbos does not recover (and there is very little evidence to show that it will recover in many areas) the land will become idle and is likely to be sold off to developers, as it would not be producing revenue for SANParks. 60 • What about the existing ecosystem that has become established? Where are the pollinators etc for the Sandplain fynbos going to come from? 77, 35 • The apparent lack of care and way in which the fynbos is being managed – it will not regenerate without fire. 20a • How do you know that seeds, which are supposed to survive 100 years, are still alive? 21, 54, 57, 76 • Fire will play a crucial rule in the proper regeneration of fynbos. We are pleased that TMNP is aware of this as set out in the Base Information Report. 47 • For all the proposed shaded areas, I suggest a more gradual or selective felling program (as opposed to clear-felling). Initially the pine trees in these areas could be preserved, but thinned out to let in enough light, and pioneer indigenous species planted in between, to determine which species will thrive and which won't. These would in their tender years be protected by the more widely spaced pine trees. (In case of the Lower Plantation areas, the planting of pioneer indigenous trees could be based on results from proposed pilot study areas . Then as the remaining pine trees age, they could be gradually felled and replaced with further indigenous trees. Thus viable shaded areas are maintained and a gradual transformation of the landscape can take place. This option would entail amending the felling schedule, method and compartments for the proposed shaded areas. In the proposed shaded section adjacent to the picnic site the camphor and redwood trees should be preserved. It would seem that many indigenous trees would do well in this portion, but could be far more appreciated if a proper network of paths was created. Should indigenous trees fail in certain areas (particularly in the lower plantation – see note below), other non – invasive alien species could be planted, or a combination of successful indigenous trees and non – invasive aliens, as is the present case in an existing area of the Tokai Picnic site, planted by forester Chris Botes. Brett Myrdal himself advocates this in | <ul style="list-style-type: none"> • Sufficient information exists to indicate that restoration of CFSF and Granite Fynbos is possible and that the seedbank currently holds enough supply to support rehabilitation. • SANParks cannot sell land proclaimed or managed as part of the TMNP. The land can only be utilised for purposes of a National Park. • Tokai forms part of a wider conservation effort i.e. to rehabilitate the mountain to sea eco-link which will support ecological processes. It will be necessary to actively intervene e.g. through control burning. • The objective is not to restore the area to an idealised primeval state but rather to allow natural pattern and process to be restored which has successfully been achieved elsewhere in the Peninsula and is already underway in lower Tokai. • Tokai and Cecilia are plantations – trees planted to be harvested routinely for commercial purposes. Scientific research and experience indicates that the plantations areas can be restored successfully and therefore the land will not be idle but managed for biodiversity and recreation as part of the National Park. • As with all commercial plantations in South Africa, trees in Tokai and Cecilia are planted in 'same age' compartments for clear fell harvesting of mature trees. Clear felling is condition of the lease and It would not be economically viable to fell individual pine compartments incrementally |
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<p>his statement in the Cape Times (26 September), referring to the Tokai Picnic site, when he says, “There is no reason why we cannot repeat this initiative....”. 76</p> <ul style="list-style-type: none"> • This option therefore works on the premise that the forestry exit strategy is reversed, and that forestry continues to co – exist with conservation and recreation, as has to date been the approach. However, this option needs to be seen in context with the overall vision for the long-term transformation of the landscape, as areas need to be set aside for rehabilitation of fynbos. Therefore this option would also entail amending the felling schedule and compartments for the proposed shaded areas. 76 	
<p>3.2 Cape Flats Sand Fynbos</p>	
<ul style="list-style-type: none"> • Provided that the clear felling of compartments had regular taken place at intervals of about 35 years between replanting cycles and that the compartments had not previously been under eucalypts, fields or pastures, there is a high potential for acid Sandveld resuscitation. 6b • Three years ago when the six hectares of plantation on Orpen Road (A14c) was felled, it was agreed that it would be replanted – on the basis that it was accepted that the fynbos seedbeds were destroyed and that nothing other than pines would grow there. Why has there been no replanting? Should Tokai residents be concerned that SANParks will divest of this asset to developers? It is quite apparent that no fynbos is growing readily in this area. Will it be “written off” and sold off? What guarantee is SANParks willing to give that this will not be the case? 9b • No research of the impacts of the 2000 years of human activities on the soils, seed banks and fauna has been carried out. It would also appear from a rapid assessment of the scientific literature that little research has been undertaken into the possibility of the successful rehabilitation of these sorts of heavily impacted areas. Until this research is presented and is subjected to critical review it would be reckless to pursue the course of action proposed in the plan: the incremental removal of the forest. 57 	<ul style="list-style-type: none"> • Some compartments have a higher level of rehabilitation potential than others but in total the areas under Pines holds sufficient seeds to support rehabilitation. • The agreement to replant Compartment A14C was made with MTO prior to the introduction of the ‘exit lease’. MTO would be able to explain why there was no replanting. • A report to inform the funding for the Critical ecosystems project requested by the FoTF, “Biodiversity assessment and Restoration Potential of different compartments in the Lower Tokai Plantation, P. Holmes, 2003, indicates the rehabilitation potential of various compartments. This study indicated that based on current species count, plantation cycles and historical presence, sufficient seeds are available to support rehabilitation.
<p>3.3 Afromontane</p>	
<ul style="list-style-type: none"> • The draft (MF) proposes the large-scale establishment of Peninsula Granite fynbos in Tokai and Cecilia. As stated in your report, para.2.4.1."The other main types, which can be expected, (i.e. this is still a conjecture) are Peninsula Granite fynbos and Peninsula Sandstone fynbos. These vegetation types are however well represented in the Cape Floral Kingdom and under protection. "There is thus 	<ul style="list-style-type: none"> • This comment refers to the Basline Information report, par. 2.4.1. dated August 2006. The report did not indicate conservation priority as low, but as “endangered” for Granite Fynbos. Subsequently updates on the biodiversity assessment and more

<p>a low priority for the establishment of this type. Re-establishment of fynbos under land that has been under pine plantations for many decades is an unknown factor, both the success of such an operation and the cost. The degrade area to the south of Tokai is an indication of how difficult re-establishment will be. Serious consideration must be given to the review of the re-establishment of such large areas. 66b</p> <ul style="list-style-type: none"> • Replanting of the pioneer species must be of necessity and be started immediately otherwise the Afromontane species will not be able to survive. 20b • It is extremely important to create nurseries of all botanical plants and trees required to replace the plantation trees, the slow growing montane trees should be planted immediately so mature established replacement trees can be planted when the plantation areas are cleared. Where possible endemic seed, cuttings and soils should be used. 30 	<p>local assessment by CoCT indicate that this specific subtype granite fynbos is not under sufficient protection, thus giving it a higher conservation priority.</p> <ul style="list-style-type: none"> • Other areas in the TMNP previously under decades of pines have successfully been rehabilitated (i.e. Silvermine, Orangekloof, Newlands). • SANParks will rely on specialists in each of the vegetation types as well as ecologists to manage rehabilitation. Annexure B of the Draft Management Framework is a first attempt at guiding SANParks in exactly this action. • Afromontane trees will only be planted in areas they are considered to grow naturally. SANParks has already planted over 40 000 indigenous trees in the TMNP and has a successful nursery at Newlands to supply seedlings.
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4 Ecological Corridors

<ul style="list-style-type: none"> • Guidelines for the Fynbos Biome indicate that corridors of 300m width are required¹, in order to promote the natural processes, such as fire, and minimize negative edge effects. As far as possible, the MF should incorporate such a corridor. Riparian zones can operate as additional connecting corridors, especially for faunal movement, but will not increase the effective area of the fynbos remnant, nor improve its functioning, as would a terrestrial corridor. 63 • The main terrestrial corridor along the southern side of Tokai plantation should be as wide as possible to facilitate management and optimize ecological functioning. Additional riparian corridors should be secured along existing streams, preferably incorporating adjacent vegetation remnants, to provide further linkages between the mountains and the lowlands. Fynbos riparian vegetation increases habitat diversity and generally supports taller vegetation (riparian scrub) than surrounding terrestrial areas. This habitat diversity is important in supporting a variety of faunal species and communities. 63 • Provision of corridors linking the mountain and lowland fynbos. This is a sound concept for large areas of fynbos but we see little purpose for attempting to manipulate such a link using the relatively small areas of Tokai and Cecilia which are already flanked by fynbos. We suggest that the enlarged riverine zones will 	<ul style="list-style-type: none"> • Research indicates that both riparian and terrestrial corridors are necessary for the conservation efforts to be sustainable. • Setting minimum requirements for these corridors are problematic and this will need careful spatial planning as the corridors compete with other uses in a narrow strip. • The approach will thus be to create corridors as close to the requirements proposed by the Biodiversity Guidelines, as possible. • The intention is that with the removal of alien vegetation and subsequent rehabilitation of the riparian zones, these ecological corridors connecting to the City open Space will be created.
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¹ Fynbos Forum 2005. Ecosystem Guidelines for Ecological Assessment

<p>serve as a habitat linking function adequately. 66b</p> <ul style="list-style-type: none">• The plans shown in your Draft, and those of SANParks, for making "fynbos corridors" are less likely to succeed than those which follow existing watercourses from high mountain slopes to the sea. The <i>Friends of Tokai Forest</i> have suggested that a corridor along the Prinsesskasteel River (and others like it) is more likely to help the flora and fauna; enlarged culverts under Orpen Road (for instance) would be relatively inexpensive to build for the use of animals to get through under the roadway. By contrast, the TMNP has apparently focused on "pockets" - for instance the "visitor entry node" around Tokai Manor House. It is unlikely that wild animals would like to show themselves freely in a space planned for a concentration of tourist facilities. 86• The proposed ecological corridor along the border of the Swaanswyk area is somewhat contrived. Most ecological corridor effects will take place along river course. The current picnic site access road be closed, broken up, and rehabilitated, and that measures be taken to allow small vertebrate and invertebrate movement under the existing Orpen Road. 93• Viable corridor linkages to support migration of species are important for the conservation of biodiversity. For this reason, the concept of breaking up the shaded areas – both in Tokai and Cecilia – to support the retention of viable fynbos nodes and corridors is advocated. 96• Having a corridor starting near Denedal Road and linking up to the top of the mountain would be very helpful for fynbos to thrive and insects etc. 27• We are fully supportive of creating a corridor from lowlands to mountain in the Tokai area. We suggest that a similar corridor could be negotiable from Cecilia to the Constantia greenbelt. There are remnants of Afromontane forest in the Constantia greenbelt with even some tree ferns (<i>Alsophila capensis</i>) in evidence. 47	
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5 Fauna Management

<ul style="list-style-type: none"> • The bird and baboon management must inform but not supersede ecosystem conservation requirements. Under no circumstances should ecosystem management be predicated by problem animals, invaders of exotic landscapes and species foraging primarily in urban landscapes that utilize plantations as breeding sites. It might well be essential to minimize populations of Black Sunbirds and Black Sparrow Hawks if these compete with or affect breeding of Sugarbirds and Orange – breasted Sunbirds which are keystone species within these ecosystems. 3C • Squirrels are serious predators of some serotinous proteas (including Silvertrees). Squirrel numbers on the urban edge will have to be controlled to maintain populations of overstorey proteas. Should the Cape Grey Mongoose re-establish, then this problem will probably be solved, but otherwise a regular squirrel cull might be required. It may be more expedient to reintroduce mongeese to the area early on during the restoration of lower Tokai. 3C • The Tokai area appears to be one of the major raptor areas in the TMNP and that many raptors and sunbirds are known to roost and successfully breed here in exotic plantations (e.g. Fish Eagles, Black Sparrow Hawks, Owls and Black Sunbirds). The requirements of these birds also need to be carefully assessed when determining clear – felling options. 6B • What intension does SANParks have regarding the protection of sparrow hawks, owls and other creatures that inhabit the plantation? Anyone who thinks that the plantations are not alive with life of various forms is seriously mistaken. 9B • The felling of active raptor nests is an unacceptable by-product of tree – felling and must be avoided at all costs. If, breeding activity for any raptor species is found, the birds should be left alone to carry out their breeding cycle. Managers should be advised by (raptor) biologists when it will be safe to start felling, surveys are carried out by raptor biologists. This should be built into the TMNP management protocol. Raptor surveyors must be given enough warning prior to felling to find the time to get out to the area and do at least one thorough survey. Training National Parks staff to carry out surveys is also a possibility that warrants consideration. 22 • The removal of alien trees causes significant habitat loss for some tree-nesting raptors, resulting in possible severe population decline. National Park, in collaboration with local raptor biologists, need to consider which species they feel should be accommodated for in terms of keeping small nest stands to allow the 	<ul style="list-style-type: none"> • Regardless of whether a species is alien or not, the effect of felling would be that they would seek other habitat. The chances are that faunal species such as baboons may rather venture into the urban area than back to the mountain due to feeding opportunities in the urban area with the subsequent problems this may pose. A monitoring program will be put in place for key species to identify unsustainable displacement as soon as possible. When such pattern is observed, mitigating measures will be investigated to address the displacement • Management of fauna on the urban interface is critical and thus the Management Framework proposes various management guidelines in this regard. • Although there are no records of e.g. the historic presence of Sparrow Hawks, it cannot be ruled out that they did occur in this area. Until such time that sufficient proof is available there nesting habitat will be protected through management actions during harvesting and regular review of impacts on the species. There are also alternative nesting sites in the suburban open space areas which these birds are well adapted to. • SANParks will co-ordinate with bird specialist to avoid unnecessary impact on birds during felling.
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ANNEXURE D: BIODIVERSITY

<p>birds to continue breeding, until it is certain that suitable alternatives are available for them or provide timeous alternatives. 16c, 22</p> <ul style="list-style-type: none"> • For many species, information on historic distribution is poor, as is our understanding of the possible effects of climate change on raptor distribution. Therefore making heavy-handed decisions which may have a substantial negative effect on their populations would be unwise. We would like to see National Parks valuing these birds, as they form part of the (more charismatic) biodiversity on the Peninsula and should be accommodated and encouraged, through a slow phasing out of exotic species, in conjunction with the rehabilitation of indigenous forest patches. 22, 68 • In summary, we do not oppose the felling of alien trees, as long as: 1) active nests are not destroyed and 2) a selection of core stands used by raptors for breeding in is maintained, while indigenous forests are rehabilitated and re-established. We suggest that managers of the TMNP and raptor biologists hold a meeting to discuss details of how to work together on these issues. 22 • What of the increasing number of birds of prey which inhabit, and nest in the forest? 56 • The following strategy should be added: “Liase with and encourage the City of Cape Town and the Provincial Government of the Western Cape to remove alien vegetation in neighbouring public open spaces, greenbelts and riverine corridors. 89 • Baboon, some raptors and a host of other fauna have adapted to the tall trees in the plantations. These environments will be lost once the felling of plantations takes place. Stands of pines, gums etc. should be allowed to remain, particularly in the higher areas of Tokai, to provide roosting sites etc. These habitats should only be removed once indigenous trees are big enough to replace them. 91 • All matters raised regarding the incorporation and recognition of the rightful place of the Chacma Baboon in the TMNP be taken to its logical conclusion through the spatial proposals to be implemented. It is especially important that proposed land use of low-lying areas (where baboons habitually feed during winter) be discussed with researchers, and relevant members of the BMT. 64 	
<ul style="list-style-type: none"> • The tentative findings of baboon research re preferred sleeping sites and acquired dietary requirements, in which pines appear to play a major role, need to carefully assess. This is especially important bearing in mind the desire to limit baboon interaction with humans in the lowland traditional winter foraging areas. 6B • The Tokai troop/s of baboons is the most viable of all the highly endangered remaining Peninsula baboons and FOTF has demonstrated its willingness to work 	<ul style="list-style-type: none"> • The action list in the MF to include the monitoring of baboons. • SANParks supports the BMT efforts to maintain sustainable baboon population on the Peninsula by minimising the conflict between people and baboons by ensuring best practice with respect to waste

towards finding management solutions to protect these baboons and to limit the interface with humans on the Urban Edge. It is imperative that all aspects of the Tokai MF should be slanted towards conserving these mammals in line with SANParks mandate to conserve nature. 6B

- The BMT supports and welcomes the strategy/action for Tokai to “ensure the maintenance of suitable habitat to sustain indigenous faunal populations and to manage the impacts of restoration on the baboon troops” in the next 5 years. 64
- BMT welcomes the approach to create “open area interface zones” on the edge of the Park to promote less conflict with the baboons and to lessen the fire risk to property and humans on the urban edge, and the specific action recommended under Obj. 3.1(c) to ensure that the firebreaks are maintained, especially since firebreaks have been sorely neglected over the last 10 to 15 years. 64
- BMT welcomes the proposal that “the baboon populations are monitored and if required, the felling schedule be reassessed in cooperation with MTO.” 64
- Baboon numbers should be carefully monitored to ensure that numbers do not exceed the carrying capacity of the area. The carrying capacity of South Peninsula Granite fynbos is far higher than that of CFSF. 3c
- The relevant representatives of the TMNP, MTO, BMT, FOTF and the researchers meet ASAP to determine the optimum felling schedule for the 2007 – 2010. 64
- In addition BMT would like to see the following added under the proposed long-term recreational objectives: (1) Compare current vs. future zoning delineation to accommodate the different urban recreation activities and minimize conflict between activities, and take into consideration the needs of baboons, their home range, sleeping sites and water sources, so as to minimize conflict between humans and baboons. 64
- Whilst there is widespread agreement that a baboon-monitoring programme is a critical management tool to minimize conflict between baboons and humans at the urban interface, it has suffered continued and severe setbacks since its inception. This is due to lack of sufficient funding, limited human resources and also because SANParks refusal to manage baboons in areas other than Cape of Good Hope. Further, the lack of coordinated effort by CN, TMNP and the Unicity to manage domestic and public area refuse, clearing of urban baboon sleeping sites and law enforcement against feeding of baboons has exacerbated the problem for the baboon monitors. 64
- Solution should be found to fund the long-term management of baboons and the BMT. 64
- Baboons have a major impact on bulb and arthropod numbers within Fynbos. It is essential that some areas be maintained relatively far from any suitable overnight

management, law enforcement and the baboon-monitoring programme.

- TMNP has submitted a proposal to the CoCT for the long term funding of the BMT.

roosts of baboons. 3c

6 Other

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| <ul style="list-style-type: none"> • Pine trees clear the air and minimize the effects of carbon dioxide in the atmosphere. Trees are the backbone of survival because they are living organisms, provide beauty and ambience, create an updraft to encourage rain, provide timber, provide shade, shelter to creatures and man, protection to man and animals, food, paper, natural recreation, a canopy for animal life, create oxygen and are priceless. We need more trees, not less. 18, 19, 84, 98, 99, 100 • The forest absorbs Carbon and generates oxygen. Carbon levels in the world are already at dangerously high levels and increasing rapidly. Trees absorb carbon but release it again when they decompose. They are therefore seen as “carbon neutral”. This is opposed to the burning of fossil fuels which release carbon when burnt, it is the release of this carbon that is primarily resulting in global warming. 28, 55, 77, 84 • Research has also shown that trees have a profound effect in cities, cleansing the air of dangerous chemicals. Fynbos lacks the height, woody growth and large leaf area needed to achieve anywhere near this. The cutting of all alien trees pines, oaks etc. will destroy Cape Town’s “green – lung” plantation and mountain areas. 54, 9b, 84 • There is also reference in the document to Carbon sinks and the fact that the pressures of human development should not determine the type of vegetation that is planted in a National Park. I agree but believe that the current and future programs of replanting indigenous trees may be able to secure funding from certain European Organizations and companies. This would free up financial resources to be used in other initiatives. 55 • There are historic records that show that trees were harvested from Table Mountain and their historic ruins of woodcutters housing in the Newlands forest if I recall in the area south of the Newlands Fire Station. So there must be grounds for re-established these original forest with indigenous specimens originally found there. 55 • It could be argued that the real issues for the future are what impacts climate change is likely to have locally, not only to fynbos plants but to all tree species (native and alien). Certainly to this point in time people in general are ignoring what climate change may and will do; we are still just talking rather than taking serious action. This creates the possibility for SANParks to take a leadership role – some one has to. 88 | <ul style="list-style-type: none"> • The Pine plantations in Tokai and Cecilia are confined to a relatively small area, and as such have no significant impact on the global climate or even the climate of Cape Town in general. Small micro-climate influences may well be observed in Tokai, Newlands and surrounding areas, but the influence will be too localised to affect long term climate trends. The usefulness of the Tokai and Cecilia forests as a carbon sink for the greater Cape Town area is also extremely limited. It is only in arboreal and equatorial areas where such trees occur naturally on a massive scale that global carbon sinking is effective. • Recent research indicates that planting of trees is only useful in counteracting climate change if planted in their area of natural occurrence i.e. areas where natural forests have been removed. |
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ANNEXURE D: BIODIVERSITY

<ul style="list-style-type: none"> • Trees counteract Global warming and latest research by the Centre for Applied Biodiversity Science, at Conservation International states that “some species will lose all climatic range because of the expected higher temperatures”. 7, 84 • The result of Working for Wetlands’ action is that the lower reaches of the river were already dry in October where previously flow would have continued through December and possibly even in January. 60 	
<ul style="list-style-type: none"> • Tokai and Cecilia have opportunities to educate people on environmental issues. 13b 	<ul style="list-style-type: none"> • Noted.
<ul style="list-style-type: none"> • Why are the environmental guidelines “25 m” from the river, when under CARA the distance cited is 30 m (see Annexure B page 8) from rivers and stream? How can it be less in a National Park than in ordinary plantations? Please ensure that SANParks applies the appropriate zonation. 3C • The Draft MF concentrates on management of clear felled pine compartments, but not much on the more ecologically damaging growth of eucalypts, especially to riverine systems and fynbos resuscitation. The eucalypt at the top of Zwaanswyk also cause a major fire risk. 6B, 103 • Non-invasive trees such as oaks etc are allowed to remain, as in the arboretum. 8, 21 • In Cecilia most of the streams already have an Afromontane component. The most important task will be the removal of aliens from the stream banks in particular Acacias, Pines, Gums and poplars. There is the possibility of linking the Constantia greenbelt with the Upper Cecilia area. There is a small portion of the riparian area on the Constantia greenbelt, which has already been restored. 47 • It is critical that MTO keep all aliens out of plantations prior to harvesting. We have noticed that this is not being done in Cecilia. This means that the alien seed bank will be increased prior to harvesting which will create a greater problem after harvesting. 47 • If the pines are considered alien then, why are the many Oak and other trees not indigenous to the Western Cape not also considered alien and removed. 50 	<ul style="list-style-type: none"> • The MTO management plan refers to 25m, but this will be reconsidered to align with National guidelines. • Various patches of non-invasive exotic trees exist outside of the Arboretum, namely eucalypt stands, redwoods, cork oaks, and camphor trees. The Management Framework shall indicate in the action tables, that a detailed survey by SANParks management be undertaken, to list these trees and determine their status in terms of invasive nature, aesthetic and historical value, recreational value and potential threat to biodiversity. Each can be dealt with in terms of these criteria. • MTO manages the plantations in terms of the lease and associated guidelines and SANParks must ensure that conditions related to keeping the plantations clear of alien invasive vegetations is achieved.
<ul style="list-style-type: none"> • The removal of alien vegetation and rehabilitation of the different fynbos vegetation types, Riparian zones, wetlands and Afromontane where appropriate, is supported. 24, 26, 33A, 62, 78, 	<ul style="list-style-type: none"> • Noted
<ul style="list-style-type: none"> • The Greater Zandvlei Estuary Nature Reserve has been proclaimed (October 2006) as a Local Authority Nature Reserve. It is regarded as the only viable remaining estuary within the City of Cape Town and cognisance that the catchment rivers originate and flow through the TMNP boundaries. Silting is a 	<ul style="list-style-type: none"> • After clear felling there is a regrowth of indigenous species which together with the branches of the felled trees assists in controlling erosion. If this is not the case active steps will be taken to rehabilitate the

<p>major cause of the vlei becoming shallower. The runoff waters on TMNP property need to be slowed down as much as possible to remove silting and nutrients entering lower down the catchment, also to help prevent flooding of the low lying development areas. Some people estimate millions of cubic meters coming off the mountain when the plantations are removed, due to the daily amount the present trees utilise from the ground water system. 30</p> <ul style="list-style-type: none"> • As an engineering geologist I have observed soils in the lower Tokai plantation area are of an intensely leached quartz sand type, derived from the Springfontein Formation that blankets most of the Cape Flats, as well as large coastal areas towards Cape Agulhas. There is nothing rare about this soil type, or presumably the fynbos type it supports. Nor is Tokai a natural wetland because the present course of the Prinskasteel River is artificial, in a canal and not down in the valley floor. The clay rich residual granite soils further up on the mountain slopes in the Cecilia, Constantia and Wynberg areas, might support a different vegetation type and I would be amongst the first to applaud the proper replanting of these areas to indigenous species, including proteas, and trees in the valleys. 54 • Why is it necessary to intervene with the flow of a river? It is impossible to restore a river to its natural state by artificially interfering with its flow. 60 • After tree felling the barren areas will be susceptible to erosion. 28, 35, 60 • Whereas it is important to restore the wetlands to prevent flooding, the notion of increased flooding under the proposed clearing regime is a bugbear. Clearing is an ongoing process and there is no reason to expect increased runoff over what has occurred over the last 60 years of clearing plantations. The restoration of Fynbos in the cleared compartments will control erosion and runoff as well as and even better than the reestablishment of pine plantations. This is entirely a spurious and illogical argument proposed without any logical thought by the anti-clearing groups. 3c, 83 • Problems are anticipated due to flooding once the upper slopes have been cleared of pines and there is an increase in runoff. Diverting flood water into the lower forest will have a negative effect on the already threatened wetlands on the lower side of the Blue Route freeway as previously flood water has drained into these areas. 60, 83 	<p>area.</p> <ul style="list-style-type: none"> • The Management Framework deals sufficiently with the issue of erosion control. The suggestions by the consultants of the Source to Sea Action plan, will be assessed and where appropriate, incorporated in the action tables. • Most of the run off is generated by the upper slopes due to the steep gradient and shallow soils, the felling of trees and removal of aliens in the riparian zones will not increase the mean run-off significantly to cause any problems. Peak flows in storm events, for the purpose of flood calculations, are however different. The pine plantations may not reduce the total volume of run-off of flood events by much, but they do affect rate of water release. Plantations lower peak flows during storm events and release the water slowly and so would fynbos. However in the period just after clear felling and before significant regrowth, the potential for increased run-off exists. This also relates to the time of harvesting to coincide with extreme weather events. If managed correctly the potential for such flooding is extremely low. SANParks will however take the necessary precautions to prevent any such potential flooding into the urban area by implementing temporary measures. SANParks will also coordinate any such measures with the CoCT. The rehabilitation of the wetland areas can however contribute to “storm water” management.
<ul style="list-style-type: none"> • Why does SANParks encourage Fauna research and not Flora research? This is due to the incorrect notion that vegetation is synonymous with plant. Plants have minimum viable population requirements and emphasis should be on research within the national Park on plant species and not animal species. 3c • Opportunities exist for avian research which can also be informative for SANParks’ managers. 22 	<ul style="list-style-type: none"> • SANParks encourages both fauna and flora research and the proposed research facility at the old Bosdorp facility in Tokai will facilitate research on all biodiversity aspects of the Park.

ANNEXURE D: BIODIVERSITY

<ul style="list-style-type: none"> • Research should be done on the impact of habitat reduction of the present species, numbers and the knock on effects to establish what impact these birds will cause when they are displaced to other outlying habitats. 30 	
<ul style="list-style-type: none"> • Drainage off roads and tracks should be carefully planned and constructed to prevent erosion. 30, 103 	<ul style="list-style-type: none"> • Agreed
<ul style="list-style-type: none"> • Another major management framework priority for Tokai TMNP is to exert serious pressure on MTO and the commercial forestry stewards to comply with their own and national and international forestry industry standards (to which they are signatories) of riparian zone management. The sins of the forefathers in planting in these riparian zones is not an excuse for current management to give the highest priority to rectifying the situation. Priority attention needs to be given from the catchment's source progressively down the system and this commitment needs to be incorporated into the Tokai MF. 6B 	<ul style="list-style-type: none"> • Noted

Heritage

Comment	Response
<ul style="list-style-type: none"> Agro-forestry has been around in Cecilia and Tokai for 80 – 120 years. Fynbos has been around for 170 million years. The appreciation of fynbos dates back to Governor Tulbagh and Lady Anne Barnard, but was also commented on by Linneaus and other European biologists. The fynbos pharmacopoeia – based on the Khoi – San herbal knowledge, survives today within the Afrikaner and Cape coloured cultures. Thus there is a strong argument to conserve and maintain the fynbos that has been used for over 300 years of European colonization and thousands of years of indigenous use as a public and cultural heritage issue. Unlike the plantations which are grown throughout the world (and are of no conservation value, except for the negative one in that it is destroying vegetation) fynbos occurs nowhere else in the world. Fynbos is not just a biodiversity conservation issue but is a public heritage issue in its own right, both historically and among local residents today. 2 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> It is not enough that a structure or feature exists for a long time for it to be of heritage or “culture conservation” value: It must be linked to a key historical event or period. For instance the “Plantation Landscape” can be conserved in the arboretum. Jan Smuts at the turn of the last century railed “these useless horrid pines, the planting of which in the Peninsula has been a calamity.” Given that pines have been responsible for the destruction of Fynbos that has been in existence for millions of years longer, the removal of pines would remove blight on our heritage. 3C 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Whereas some people see the plantation as of high value, others see it as of little or even negative value. Specifically the significance of our Critically Endangered Heritage, and international, national and local conservation assessments that put Lowland Fynbos and Renosterveld ecosystems as among the most threatened in the world. The plantations are just another commercial enterprise destroying our threatened ecosystems. In addition, the presence of hundreds of spectacular plant species, each with millions of years of history, special life histories and highly specialized pollination and seed dispersal mechanisms, historical use, by pre-colonial and colonial – and even contemporary - peoples, for food, medicine, structures and other uses (such as bedding, grazing, rope, etc.) and 	<ul style="list-style-type: none"> Noted



ANNEXURE E: HERITAGE

Comment	Response
<p>interesting taxonomy and ethnology, and associated insects, birds, mammals and other organisms, make Fynbos one of the most exciting vegetation types on earth. By contrast, the plantations are almost sterile, apart from some alien squirrels, chaffinches and nesting sites (but not foraging sites) for a few range – expanding bird species. Whereas, Fynbos vegetation types show subtle and interesting variation with topography, drainage, soil features, slope, aspect, soil depth, and many other environmental features, plantations are uniformly monotonous. Whereas Fynbos allows one to view wide vistas of mountain, plain, oceans and slopes, or close – up, a myriad of flowers, seeds, parasites, predators and diversity, plantations allow one to only see tree trunks and pine needles. Furthermore, Cape Flats Sand Fynbos and Pensinsula Granite Fynbos occur nowhere else on earth other than within Cape Town. Their uniqueness value (of what little is left) is irreplaceable. Plantations – either pine or gum - can be found anywhere in the world, and in most countries: they are of no uniqueness value whatsoever. Only In Cape Town can we conserve or visit these veld types. Plantations can be grown or found anywhere. The cultural significance of Fynbos is thus of extremely high value, extremely high vulnerability and of international significance. 3C</p>	
<ul style="list-style-type: none"> • A missing recommendation is that Red Data List species should be mapped and restored, and that species historically known from the area and other equivalent Cape Flats Sand Fynbos habitats, especially those that are almost extinct in the wild, should be restored to viable populations as soon as possible. The Diastella proteoides mentioned is but one of over a hundred such species. These Red Data List species are also part of our cultural and social history, and can only be conserved in a handful of sites within Cape Town, and nowhere else except ex situ in botanical gardens. 3C 	<ul style="list-style-type: none"> • Noted
<ul style="list-style-type: none"> • The Buchu plantation is not natural: it is not indigenous to the area, and it is a hybrid. Careful monitoring is required to ensure that it does not hybridize with indigenous Rutaceae that occur naturally within South Peninsula Granite Fynbos and that re-establish after clearing. 3C 	<ul style="list-style-type: none"> • Noted
<ul style="list-style-type: none"> • The Heritage assessment, is predicated on assumptions that have long been discredited. Chief among these is the notion that “culture” is a property of non – urban or traditional populations. Such notions 	<ul style="list-style-type: none"> • The heritage assessment is predicated on principles of the National Heritage Resources Act (as stated on page 4). The assumption that culture is a property of non-urban or traditional populations is

Comment	Response
<p>were popular in academic social anthropology in the 1950s but have no currency whatsoever in modern anthropology. Culture is, on the contrary, a property of all organised human communities. Thus the document states that the forest “is not of high significance because it is not associated with living heritage (e.g. initiations sites, use of indigenous vegetation for medicinal purposes by traditional healers), displacement and contestation: it is not a site of political conflict/struggle and also not associated with an historic event or public memory. Therefore it cannot be regarded as an inspirational landscape.” The ignorance and bias of the drafters is vividly apparent in this passage. The fact is that the plantations are culturally important to the many thousands of people who consistently use them for recreational purpose. The view adopted by the drafters is that “culture” attaches to traditional or pre – modern society and disappears when societies are industrialised and urbanised. This view of culture is of course completely indefensible, and it is surprising that it has been permitted to creep into the document at all. Its presence can only be explained in one of two ways. Either the drafters are wedded to antiquated and essentially patronising doctrines about the nature of culture, or they are seeking only to identify aspects of use that can be marketed to foreign tourist – on the lines of the “culture village” that abound in many tourist sites. It is not clear from the document which explanation is more likely. 9B</p>	<p>erroneous as should be clear from the following extract from the preamble to the NHRA. “Our heritage... has the potential to affirm our diverse cultures...”. The NHRA and Appendix A see heritage as playing a dynamic role in constituting culture. Living heritage such as cultural traditions, oral histories, society and social relationships (NHRA: 9) and heritage categories detailed on page 1 of Appendix A, are protected to celebrate South Africa’s cultural diversity.</p> <ul style="list-style-type: none"> • From this perspective the allegation that “ <i>The view adopted by the drafters is that “culture” attaches to traditional or pre – modern society and disappears when societies are industrialised and urbanised.</i>” is patently incorrect. The heritage resources of high significance, the Manor House Precinct, Manor House, Porter Reformatory, Arboretum have been, in part, assessed as highly significant because of their urban cultural significance. • SANParks has no intention of packaging Tokai and Cecilia as a ‘cultural village’ tourist site.
<ul style="list-style-type: none"> • This indefensible use of the concept of culture is repeated on several occasions, either implicitly or explicitly. The document states that “at the open day representatives of an indigenous group of Khoekhoen descent, stressed that they would prefer the natural vegetation of the area to be fynbos...” (But is silent on the cultural views of other groups, including the groups who regularly enjoy the amenities afforded by the plantations.) Again: “The plantations is not significant from a uniqueness or spiritual point of view. Its significance for its strong or special association with the life or work of a person, group or organization of importance in the history of South Africa is not high.... Similarly in terms of representativeness, the forest has low significance.” Such a view is sustainable only on the assumption that signification is somehow detachable from some groups and not from others. 9B 	<ul style="list-style-type: none"> • The importance of the plantations for some groups, as expressed by Aikman et al (2001), as well as the view of the representative of the indigenous group is stated in this section. The goal of the assessment was to illustrate, as stated on page 5, that the plantation landscapes are open to differential interpretation and human response.

ANNEXURE E: HERITAGE

Comment	Response
<ul style="list-style-type: none"> • Again, this deliberately separates one group of people from another and implies that certain groups have greater significance than others. This is a determinedly racist view and one can only assume that nothing whatever has been learnt from South Africa's past. 9B 	
<ul style="list-style-type: none"> • The Annexure goes on to state that the picnic area is of medium significance. I doubt that the many who come from previously disadvantaged communities to picnic there would agree. For them the picnic site is a traditional area of refuge. 9B 	<ul style="list-style-type: none"> • The significance assessment of the picnic area took more than recreational significance into account.
<ul style="list-style-type: none"> • The Annexure further comments that the picnic area is of low historical, educational, scientific, uniqueness, indigenous, spiritual and representative ness significance. Perhaps. But is a picnic area and, as such, is directly linked, in the now, to people's social, psychological and physical well-being. The importance of a safe, treed refuge is of prime importance in a city with high stress levels and a spiralling crime rate. To deny that is short sighted. TMNP is supported to be a "park for all", yet everything contained in Annexure A makes it quite clear that it is a Park for only a few. 9B 	<ul style="list-style-type: none"> • The Draft Management Framework indicates that the picnic area will remain although it is proposed to be re-aligned in part. The re-aligned picnic area will play the same role as the existing picnic area. The extent of the picnic area remains approximately 20ha. • TMNP remains largely an 'open access' Park for all, with very affordable access to the main paypoints (Cape Point, Boulders etc.) provided by the Cape Town Wild Card. The current access arrangements for Tokai and Cecilia will be maintained in the future.
<ul style="list-style-type: none"> • Khoisan history and occupation are best dealt with at the Museum in Cape Town. 16C 	<ul style="list-style-type: none"> • Khoisan history and occupation is directly relevant to Tokai. The names of rivers and caves in fact derive from the Khoisan history.
<ul style="list-style-type: none"> • Tokai, Cecilia and Constantia Nek are certainly NOT of "medium significance" to either the people of the Peninsular or the visitors. They are of very significant and major importance to all. "The Fairest Cape" would be a joke without its trees and forest. I would go so far as to say that these forests should be classified as a National Heritage and protected accordingly. 16C 	<ul style="list-style-type: none"> • According to the NHRA different types of significance must be assessed to determine the grading of a site. These include "aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance (NHRA: 8). Annexure A took the aesthetic and recreational value of the plantation into account, but the plantations scored low on the other types of significance. • Constantia Nek is not included in Annexure A as it is not part of the study area.
<ul style="list-style-type: none"> • The analysis of the Management Plan has found that the legislative framework, the National Heritage Resource Act (Act 25 of 1999)(NHRA) has been ignored, the Heritage Significance and Vulnerability Assessment that was undertaken requires critical review in that its findings are questionable and that the Management Plans are being developed ahead of important revisions to the Conservation Development Framework (CDF). If the proposed Management Plan was adopted heritage resource of high 	<ul style="list-style-type: none"> • As stated on page 1 of the Assessment: "The significance assessment was undertaken according to the guidelines of the NHRA which stipulate that aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological significances must be determined. These categories, with the exception of linguistic and technological significance, have been included. In addition indigenous spiritual, experiential and uniqueness and representative significance have been assessed". The Management

Comment	Response
<p>significance will be lost. 57</p>	<p>Framework is a 'framework for planning' not a 'plan for implementation'. Implementation will be preceded by the necessary approvals, heritage and otherwise.</p> <ul style="list-style-type: none"> • The findings that are questionable have not been specified. The heritage assessment has used the Heritage Asset Sensitivity Gauge (HASG). The HASG is discussed in an article that has been peer reviewed by heritage professionals. It is a useful instrument to summarize and discuss heritage sensitivities on a scoping level and the need for further heritage specialist input is emphasized in both the published article and the assessment of Tokai and Cecilia. • This Management Framework (MF) is developed as a 'framework for planning' (Terms of Reference) and is designed to highlight important issues that will be discussed by the CDF. The Framework intends to formulate a "common vision rather than a detailed plan for implementation." The recommendations and vision of the MF will be incorporated into the review of the CDF and not vice versa. • This comment ignores the recommendations made for all the discussed heritage resources. These recommendations clearly state that full phase one heritage assessment, historical and archival study must be undertaken before any development may impact on the heritage resources. The plantation landscapes are recognized as heritage elements, but SANParks will be able to conserve only some of its features due to decisions made that have been beyond the legal and managerial control of SANParks (as explained in the introduction of the Management Framework).
<ul style="list-style-type: none"> • Section 30(5) of the Heritage Resources act, requires that "At the time of a compilation or revision of a town or regional planning scheme or a spatial development plan... or at the initiative of a Provincial Heritage Authority... a planning authority shall compile an inventory of the heritage resources which fall within its area of jurisdiction and submit such inventory to the relevant heritage authority", (authors' italics) and, (30{6}) "A provincial heritage authority may approve an inventory of heritage resources." TMNP is legally bound to submit an inventory to Heritage Western Cape. This would begin a process of assigning significance to the sites. TMNP could suggest grading for the sites and these could be 	<ul style="list-style-type: none"> • TMNP is a National Heritage site and has submitted an Integrated Conservation Management Plan to SAHRA which includes the TMNP Heritage Resources Management Plan and Inventory. Such an inventory has been compiled in the TMNP Heritage Resources Management Plan, 2004. This document has been submitted to SAHRA as the relevant management authority. • The SANPark's Corporate Plan (1998) and the Park's IEMS: Management Policy (2000) and Conservation Development Framework (2006) emphasize the commitment of the park to the

Comment	Response
<p>reviewed by HWC. Section 31 requires that a planning authority, “must at the time of a compilation or revision of spatial plan, investigate the need for the designation of heritage areas to protect any place of environmental or cultural significance. (Authors’ italics). Heritage areas are still to be identified by TMNP, this identification process has only just commenced. Section 38 requires that a heritage impact assessment (HIAs) be undertaken for certain identified types of development. It is clear that Section 38 applies to both Tokai and Cecilia and HIAs are a statutory requirement. 57</p> <ul style="list-style-type: none"> The TMNP’s Conservation Development Framework (CDF) allowed for the development of a heritage resources map containing heritage resources (the inventory). These were however not graded although each contained a statement of significance and vulnerability. Sensitivity ratings attached to various zones in the (CDF) were based on environmental sensitivity rating and did not accommodate the cultural significance of sites. As a result sites of cultural significance were not necessarily highly graded if they did not fit the standard environmental sensitivity grading. This oversight was pointed out to the Park in negotiations between the City of Cape Town and the Park in 2004. It was decided that the heritage or cultural significance of sites would be included and assessed in the revised CDF, which was due at the time. The CDF revision is currently underway and Baumann and Winter Heritage Consultants have been appointed to consolidate concentrations of heritage sites. Until this process has been completed it is premature to develop management plans like those currently proposed. 57 	<p>identification of the heritage resources. Heritage areas have been documented in the TMNP Heritage Resources Management Plan, 2004 and numerous other documents discussing the heritage inter alias the recent heritage assessment for Tokai and Cecilia.</p> <ul style="list-style-type: none"> This statutory requirement is recognized and acknowledged by SANParks, and therefore the significance and vulnerability assessment was commissioned as part of the MF. As discussed above, the MF demonstrates commitment to undertake further assessment and research with regard to the heritage resources as required. This Management Framework is aimed at a subset of the resources of the TMNP and thus part of interrelated continued process. It is a necessary prerequisite to the compilation of the final CDF, and not premature. It is in the interest of the natural and cultural heritage to obtain as many as possible perspectives to incorporate into the CDF.
<ul style="list-style-type: none"> S Wurz is not currently listed as an accredited member of the Association of Heritage Practitioners: Western Cape and her relevant qualifications and experiences and standing in heritage resources management are unknown. 57 	<ul style="list-style-type: none"> Dr. S Wurz is an accredited with the Association of South African Professional Archaeologists (ASAPA – see http://www.asapa.org.za) as a heritage impact assessor and field director. This accreditation system is recognized by SAHRA and HWC and both these institutions accept assessments from this individual. There is no statutory requirement to register with both ASAPA and the Association of Heritage Practitioners: Western Cape. Dr S Wurz has assessed heritage impact assessments for SAHRA (National) for the past two years and is thus well versed in heritage management issues. This information could have been obtained with minimal effort.

Comment	Response
<ul style="list-style-type: none"> A study entitled Heritage Significance and Vulnerability Assessment of Tokai and Cecilia was undertaken for TMNP by consultant S. Wurz and was apparently the central informant of the Management Plan. The consultant states that the assessment was based on a site inspection, a desktop study and insights gained at an open day and stakeholder group meetings. It is claimed that the significance assessment was undertaken according to the guidelines of the NHRA. This is not referenced. In addition indigenous spiritual, experiential and uniqueness and representative significance was assessed using the so – called Heritage Asset Sensitivity Gauge (HASG). The HASG is designed to address the managed use of pre-colonial archaeological sites in the Western Cape. The system was tested on a number of rock art sites in the Cederberg, Clanwilliam and Ceres. As useful as this tool appears to be it seems to be an inappropriate instrument of assessing the significance of one of the earliest settlement areas in the Cape Peninsula, the cradle of scientific forestry in South Africa and the site of an important historical institution, the Porter Reformatory. 57 	<ul style="list-style-type: none"> The NHRA states the types of significance that must be addressed (see also above in introduction a). In the article published on HASG there is an extensive discussion in significance assessment and on the requirements of the NHRA which made another extended discussion of these issues unnecessary. The appropriateness of the HASG for Tokai and Cecilia was confirmed by the authors of the HASG.
<ul style="list-style-type: none"> Four sites were found to be of high significance; Tokai Manor House Precinct, Tokai Manor House, Porter Reformatory, Tokai Arboretum. These sites are obviously of high significance and indeed the Arboretum and Tokai Manor House Precinct are already listed as Grade II sites. Given the historic, aesthetic architectural and social significance of the Porter Reformatory this complex is clearly of high significance. The findings however tend to isolate these elements and they are not seen as interlinked and integral parts of the larger landscape framework of forests, fields etc. The management plan for example encircles the Tokai Manor House with a park although until the 1980's the setting of the complex was a working (institutional) farm and the potential to re-establish an appropriate settings remains intact. 57 	<ul style="list-style-type: none"> The Tokai and Cecilia landscapes are productive cultural landscapes and such commercial landscapes are dynamic and not amenable to 'fossilization' in time. It is thus subject to different principles when assessing its vulnerability. The character of the landscape has been changed by the building of several houses, the Chrysalis academy and destruction of the original School of Forestry. Although the felling of the plantations will once again change this character, it is acceptable as a production landscape.
<ul style="list-style-type: none"> Three sites were found to be of medium significance; Tokai State Forest Landscape, Tokai Picnic Area and Cecilia State Forest. This grading is surprising, particularly in the light of the current debate brought about by the publishing of the draft proposals. When the criteria used in the assessment are closely examined it becomes understandable. 57 	<ul style="list-style-type: none"> The objective of the plantations has always been commercial and its aesthetic properties were a fortunate spin-off. The plantation does not play a prominent enough role as a setting for the Manor House to change any of the recommendations. The definition of 'inspirational landscape' is inaccurate. Note on page 2 that a more extended and nuanced definition of an 'inspirational

ANNEXURE E: HERITAGE

Comment	Response
<ul style="list-style-type: none"> The Old Tokai Farm Road may have had a pre – colonial role as a stock trail and later became the road linking the historic farms of Constantia, Bergvliet Tokai and Steenberg. It is shown on the earliest maps and remains as a part of the Tokai landscape with intrinsic links to the Manor House complex and the Reformatory. It linked the Ondertuine of the Porter Reformatory to the campus and has been used recreationally to the present day. The Heritage Assessment blandly states that clear felling along road will have no impact on the road. 57 	<p>landscape' is provided.</p> <ul style="list-style-type: none"> This statement is inaccurate. The Heritage Assessment (p20) states that: "The impact of clear felling on the road is low." The recommendation is that a Cultural Management Plan that discusses the conservation and monitoring schedule and that addresses the threat of erosion must be compiled.
<ul style="list-style-type: none"> Die Ondertuine themselves appear from the map record to have been continuously cultivated from the 18th Century, part of Soetvlei/valley. This elaborate system of irrigation furrows and garden plots bordered by a row of cottages is not even graded as low significance and will be removed in terms of the plan. This would be a tragic loss as it is one of the few remnants of this landscape pattern in the Constantia-Tokai Valley still in use. 57 	<ul style="list-style-type: none"> The Ondertuine was not graded, as it does not form part of the study area. The plans do not indicate the removal of the Ondertuine which is in any event outside the study area.
<ul style="list-style-type: none"> In terms of the interim grading system used by most heritage practitioners many of these sites are of possible Grade IIIA significance. Rhodes Drive for example is a scenic drive of metropolitan and possibly provincial significance. The Contour Path is equally significant in historical, aesthetic and social terms. 57 	<ul style="list-style-type: none"> TMNP is a National Heritage site. The heritage assessment did assign arbitrary levels of significance (high, medium, low), but did not grade the heritage resources according to the system suggested by Bauman & Winter, the SAHRA Minimum Standards (2006) or the HWC minimum standards (2006). Such detailed ratings are outside of the scope of this heritage statement that is fundamentally a scoping document.
<ul style="list-style-type: none"> The various buildings listed are conservation worthy in themselves and cannot be cursorily dismissed. Nor can the remnants of the historic road systems that still structure the landscape. 57 	<ul style="list-style-type: none"> The heritage resources preliminarily graded as 'low' are not 'cursorily dismissed' as should be clear from the recommendations. The recommendations for all of the resources with a low grading state that Phase 1 heritage impact assessments must be undertaken and that Cultural Management Plans must be drawn up to ensure their protection.
<ul style="list-style-type: none"> The heritage assessment is flawed and requires critical review. 57 	<ul style="list-style-type: none"> The Assessment recommends that there may be no impact on the heritage resources prior to Phase 1 assessments. This complies fully with the legal requirements of the NHRA. No decisions, apart from the incremental removal of the plantations, or proposals have been made that will endanger the heritage resources.

ANNEXURE E: HERITAGE

Comment	Response
<ul style="list-style-type: none"> It is appropriate that the revised CDF be completed and reviewed by HWC. This would then inform the proposed management plans affecting Cecilia and Tokai Forests. This is particularly important in the light of the narrow focus that has characterised issues around the identification of significance; and the public concerns expressed in the media regarding the loss of traditional recreational activities, the conservation of amenity and shade areas; and the significant role that the forested areas of Tokai and Cecilia have played in the lives and affections of Capetonians. 57 	<ul style="list-style-type: none"> SAHRA is the relevant management authority. The CDF has been submitted to SAHRA. All current recreational activities are envisaged to continue in Tokai and Cecilia although in a changed landscape as the plantations are incrementally harvested and rehabilitated due to the biodiversity significance.
<ul style="list-style-type: none"> Annexure A, which deals with heritage and cultural value of the forests is frankly offensive and unacceptable. To state that the forest “is not of high significance” because it is not associated with living heritage (e.g. Initiation sites, collection of indigenous vegetation for traditional healers) is both incorrect, in that many of the indigenous trees there have been severely damaged by bark stripping activity and negates the value placed on it by users who use the forest as a place to restore peace to their souls after stressful days. The forests have tremendous cultural and spiritual significance for many users. 60, 83 	<ul style="list-style-type: none"> The significance assessment of the plantations was undertaken from various perspectives. This particular paragraph referred to the living heritage aspect, but other significances, including the social, experiential and aesthetic are discussed as well. On average, according to the HASG, the plantation is of medium significance. At the time of writing, no specific instances of spiritual use and significance have been documented. The predominant cultural view as expressed by Aikman et al (2001) as well as the view of the representative of the indigenous group was put forward. The goal of the assessment was to illustrate, as stated on page 5, that the plantation landscapes are open to differential interpretation and human response.
<ul style="list-style-type: none"> It is interesting that the views of one cultural group (Koekhoen) are put forward in the document while the views of all other cultural groups are completely ignored. Is this because this group agreed with SANParks plans, while others dared to disagree. What qualifies SANParks and their consultants to determine for a wide range of users what is spiritually or culturally significant and what is not? 60 	<ul style="list-style-type: none"> The predominant cultural view as expressed by Aikman et al (2001) as well as the view of the representative of the indigenous group was put forward. The goal of the assessment was to illustrate, as stated on page 5, that the plantation landscapes are open to differential interpretation and human response
<ul style="list-style-type: none"> Like Kirstenbosch and the Cable Way, Tokai and Cecilia are synonymous with Table Mountain and the neighbourhoods in which they are located. When reading the MP and specifically Theme 4: Cultural Heritage; objectives 4a) and 4c), the words used are “rediscover, rehabilitate, nurture, conserve and restore” In terms of the SMP chapter 4.6 Cultural Heritage resources management the first sentence commits the park “to identify cultural resource within parks and devise strategies for managing these resources in collaboration with local communities”. The commercial plantations have been used for recreation space in Cape Town for decades. 	<ul style="list-style-type: none"> The decision to phase out commercial plantations at Tokai and Cecilia was taken by National government, not SANParks. SANParks was assigned the management of the lease permitting MTO to harvest the trees over 20 years because Tokai and Cecilia plantations are located in the Cape Peninsula Protected Natural Environment. There are no proposed changes to current recreational activities taking place in Tokai and Cecilia plantations in the MF. A strong argument can be made for the conservation and maintenance of the critically threatened fynbos that has been used

ANNEXURE E: HERITAGE

Comment	Response
<p>The reason that they were destined to become part of our history was due to the fact that they were deemed not to be economically viable. This is no longer the case. They are a valuable economic resource that has been used by generations for outdoor recreation space. To simply remove them with no consultation or study of the consequences is against the principles by which the park is supposed to be managed. 73</p>	<p>for over thousands of years and is unique to the area.</p>
<ul style="list-style-type: none"> In point 2.2 of chapter 2, there is the suggestion that a link be created between the pre-colonial and colonial past and the present and there is talk of the 'celebration of heritage'. That is all well and good, however our desire for the presence of the pine forests will not be satisfied by a wall of pictures in a TMNP building that stands as testimony to our arboreal and shaded past. The remembrance of the pine plantations, the flow of school children and tourists through the SANParks education centre where they can view images of our heritage will not lessen the strength of the sun on our backs as we walk through shadeless fynbos where forests once existed. Nor will the photos replace the loss of the aesthetic charm of this wooded valley. Cape Town cannot be returned to its pre-colonial state. 83 	<ul style="list-style-type: none"> The objective of restoring critically endangered vegetation types (Cape Flats Sand Fynbos, Peninsula Granite fynbos) found nowhere else in the Cape Floral Kingdom, let alone the world, is not to restore the area back to some pre-colonial state as stated, but rather to allow natural pattern and process to take place in an already modified landscape.
<ul style="list-style-type: none"> SANParks states 'the plantation is recognised...as a heritage element' (p.6). Heritage is a tricky word to define and quantify. How does one assess the heritage value of a particular site? Is the heritage concept inclusive of all groups of people or only indigenous? At what point does heritage in the historical sense intersect with usage and social significance in the present tense? 83 	<ul style="list-style-type: none"> The Management Framework process provided the opportunity for the public to contribute their views. The heritage assessment is based on the requirements of the NHRA and was guided by the heritage definition and significance criteria of the NHRA.
<ul style="list-style-type: none"> Heritage does not have a cut-off date; what exists today becomes the heritage of the future. Heritage is that which has been transmitted from the past, no matter the nature of that past. Cape Town and by extension South Africa has a population that is a mix of indigenous peoples and colonisers from many other nations. Though our past may have been full of torment, one cannot eradicate it. Implying that heritage is linked solely with indigenous is racist and non-inclusive. 83 	<ul style="list-style-type: none"> The assessment strived to put forward indigenous as well as contemporary views.

ANNEXURE E: HERITAGE

Comment	Response
<ul style="list-style-type: none"> With regard the concept of social significance, it is not only the local community who honour it as 'central to their identity'. The forest is socially significant for many user groups, not only those that live on its perimeter. These forests/plantations are utilised by people from all around the peninsula. 83 	<ul style="list-style-type: none"> The heritage significance study dealt with 'the people that use the area as being the community" and do not refer to a specific geographical area.
<ul style="list-style-type: none"> The claim that it is not significant from a 'uniqueness or indigenous spiritual point of view' (Annexure A p.15) misses the point. The Cecilia and Tokai plantations have great spiritual significance for those that make use of them and to these people they are unique in that they provide that which cannot be found elsewhere. 83 	<ul style="list-style-type: none"> In terms of assessing heritage significance, spiritual use has to be "documented" as rituals. The mere use of an area by some individuals for relaxation, does not "qualify" as spiritual significance.
<ul style="list-style-type: none"> With regard the vulnerability of the forested areas the phraseology used - 'highly vulnerable due to its certain demise' - makes transparent that SANParks is making a mockery of its Public Participation 83 	<ul style="list-style-type: none"> As stated many times in this process, a decision was made by National Government, (not SANParks) to phase out commercial plantations at Tokai and Cecilia. This decision was assigned to SANParks in the form of the 20 year lease for the harvesting of the plantations. As has been stated many times, public consultation is around the future of Tokai and Cecilia, post harvesting.
<ul style="list-style-type: none"> Process as - according to this statement - the removal of the trees is decided. SANpark's mission to 'acquire and manage a system of national parks...to the joy and benefit of the nation' (Annexe A p.16) forgets that in this case it is not a national park, but an urban park; forgets that it is not the impact on South Africans nation wide or tourists worldwide that is of primary importance but on those that live in the greater Cape Town metropolis and those that make use of the forests. What must be carefully gauged is its significance to those that value these shaded refuges. 83 	<ul style="list-style-type: none"> TMNP is a proclaimed National Park and although it has a certain urban context which distinguishes it from most other National Parks, the key objective of biodiversity conservation cannot be denied. TMNP is furthermore part of the Cape Floral Region World Heritage Site, which indicates its international importance with regard to inter alia its biodiversity significance but also its pre-colonial significance. This park can thus not be compared to a normal urban park or urban open space.
<ul style="list-style-type: none"> Heritage should not be elevated to the same level as Biodiversity; i.e. given that heritage issues pale into insignificance when pitted directly against biodiversity issues in terms of time scales. Most humans will, however, not comprehend that numerous order of magnitude separate the time-scales at which biodiversity evolution versus recent human conversion have taken place. 93 	<ul style="list-style-type: none"> Noted

ANNEXURE E: HERITAGE

Comment	Response
<ul style="list-style-type: none">The potential extension of the Arboretum as an important heritage and recreational site is supported. The retention of other exotic trees, which have heritage and urban design assets, should be carefully considered, especially when situated within or close to the urban environment. The tall eucalypts lining Rhodes Drive below Cecilia are a case in point in this respect. 96	<ul style="list-style-type: none">Noted

Recreation

Comment	Response
Dogwalking	
<ul style="list-style-type: none"> In Cecilia service roads are indicated, which may be used for dogs, walkers and horses as opposed to paths and other roads from which apparently dogs would be excluded. As the intention is to phase out service roads no longer needed for park management as harvesting of sections of pines gets underway, even most of these routes will be eventually taken out. 61, 46, 72 	<ul style="list-style-type: none"> The service routes as indicated with red lines in figure 7 in the draft Management Framework will remain as multi-purpose routes for walking, dogs and horses as well as to give access by vehicle for management purposes. The Management Framework proposes that the existence of the roads be reconsidered when the plantations are harvested, but this will take the recreation patterns and needs at that time, into account.
<ul style="list-style-type: none"> As long as dogs remain on man made paths under voice control there is no threat to any wildlife, these animals are very aware of human traffic and keep to a safe distance in the fynbos. 29, 61, 70 Dogs at all times should be under their owners control and that owner should be personally responsible. Properly trained dogs do not need to be on leads, only those dogs that are incorrigible. Dogs on leads are inclined to strain at their leads and become more aggressive and trouble may ensue. Over 60 years walking these mountains with dogs, I have encountered very little trouble between the different activities; certainly not enough to impose restrictions on PROPERLY trained dogs. The less control, regulations and regimentation there is, the more people will enjoy TMNP. 16c It should be noted that keeping dogs on the main service roads increases contact between them and other park users and previous dog walkers from being able to enter quieter, more remote areas. TMNP does not taken into account the fact that for many park users, including those who are accompanied by dogs, the very point of hiking or walking on our local mountains is to get away from other people and to enjoy the peace and quiet, which the upper slopes of our mountains offer us. The proposed policies of TMNP make this impossible and in many cases defeat the very reason why most of us enter the park in the first place. 44 	<ul style="list-style-type: none"> The draft MF provides that the current dog walking arrangements in Tokai and Cecilia remain in place. Walking with dogs in the TMNP is subject to the Park’s Environmental Management Programme for walking with dogs and issues related to dog walking will be addressed in the review of this EMP.



ANNEXURE F: RECREATION

Comment	Response
<ul style="list-style-type: none"> • Walking with dogs on leads is not practical if one has more than one dog and greatly reduces the enjoyment and value of the exercise for both dog and owner. It also diminishes their protection benefits. I rely on my dogs to walk ahead of me and to warn me if there is someone undesirable lurking near the path. They sense the presence of another person long before I can. Also having dogs on leads makes them more likely to feel threatened by other dogs thus increasing possibility of dogfights. If a dog is determined to break away from its owner, being on the lead will not be much of a deterrent. It is far better to have dogs on voice control and not to depend on a leash to do what should be done with proper discipline and training. Leads should be at hand to use briefly if required (e.g. If an oncoming walker is clearly afraid of a dog, it can be leashed until the person has passed by). Having dogs on leads is not going to stop people from hunting with their dogs illegally, or unaccompanied dogs hunting small game if indeed these things happen at all. 60 • They need to be able to run at their own pace, and they need open space in which to do this. Cecilia has afforded this possibility; I have been going there for long enough to know that it is a well-utilised space for dogs and owners, without any serious incidents, nor without any serious degradation of the environment. 72 	
<ul style="list-style-type: none"> • No further restrictions should be imposed and the status quo should remain as is. 29, 13b, 68, 70, 68, 61, 70 • Dog walking should not really be restricted such as: not higher Cecilia, and dogs should be allowed all the way up to the dams and along, and the contour path, all of these. But in Tokai there are baboons, so not there. 13b • To ensure that dogs and their handlers continue to have free access to all areas within the Table Mountain National Park. 61, 90 • I have been walking my dogs in Tokai Forest since 1972 and have been very privileged to do so. I have 4 very well behaved dogs and also have a wild card with permission to take them 	<ul style="list-style-type: none"> • Areas open to dogs will remain open but in certain instances they may be restricted to paths where it is specifically in the interest of conservation/rehabilitation.

ANNEXURE F: RECREATION

Comment	Response
<p>up Silvermine. I have never been involved in any unpleasant incident and have enjoyed my walks at least twice a day. I would be devastated if I could not walk any more as I find that after a very hard morning at work my peaceful time is at lunchtime in Tokai Forest. 75, 87</p> <ul style="list-style-type: none"> • Most important Dogs area deterrent with the rising security risk. Are there any statistics of who is attacked? Do these people have dogs or not? I doubt it, as 'easy' targets are usually hit. 29 • Dogs should be allowed also at the top of Table Mountain as they also contribute to safety of walkers/ hikers. 25 • The plantations are one of the last relatively safe places for walking and exercising dogs. 56 • These restrictions are totally unacceptable and go against previously agreed access arrangements. It also puts people (especially woman) at increased risk, as criminals are more likely to frequent the lower tracks where they have quick getaway options. 60 • Make easy-access path for dogs to the higher levels and mountain. 13b, 72, 74 • SANParks promised that "the conditions for dog walking cannot be changed unless the Environmental Management Plan is revised. And this is subject to a full public engagement process. 60 • Dogs can walk on any surface and on steeper gradients. 44, 46, 61 • Consider allowing dog walkers into the Arboretum as it used to be in the 1980s in compensation for the future loss of a considerable area of shady recreational space, provided that dogs are on leads at all times and that pooper-scoopers are used. 63, 61 • TMNP's intention is still to keep dogs out of the new Remote Wilderness zones. Friends of the Dog Walkers' standpoint are that walkers should continue to be allowed to be accompanied by their dogs anywhere except in the already existing prohibited areas. 29 	

ANNEXURE F: RECREATION

Comment	Response
<ul style="list-style-type: none"> I have never seen any of the dog's catching/chasing any other animals and dogfights are highly unusual. Generally the problems only occur with leashed dogs, as these are more territorial. As long as the dog is controlled it is actually better not to have them leashed except where vehicular traffic can endanger them or when there are baboons close by as occurred in Tokai recently. These baboons were more in danger from traffic than from anyone's dog. 38 People choose to go to the forests of Tokai, Cecilia and Newlands because of the cool shade these areas afford and because of the quick and easy access to the higher slopes of the mountain in the case of Newlands and Cecilia. The plan shows severe restrictions on people walking with dogs. It appears that they will be confined to the very lowest tracks at Cecilia and not allowed on paths. In Tokai it seems that they will be confined to the rapidly shrinking lower forest despite earlier proposals that the slopes of Constantia berg be opened to dog walkers too. Very few people walk there without dogs. 60 	
<ul style="list-style-type: none"> I do think that there should be bins at the start of walks and poo bag dispensers and signs telling people to pick up dog poo. This does become unpleasant especially in summer when there is no rain for long periods of time. 70 	<ul style="list-style-type: none"> Noted
Horse riding	
<ul style="list-style-type: none"> Horses not to be allowed above a certain point on the service road in Cecilia. 17 	<ul style="list-style-type: none"> Noted.
<ul style="list-style-type: none"> Horses are quite destructive of footpaths and there is a tendency for utilised paths to grow ever wider. In sandy soils it is difficult to walk along paths used by horses. If horse riders are to continue using the off-road Tokai area, dedicated bridleways will be required with heavy penalties issued for non-adherence to those bridleways. 63 	<ul style="list-style-type: none"> Noted
Mountain Bike	
<ul style="list-style-type: none"> Mountain Bikes will not frequent Tokai if the plantations are harvested. 9b, 60 	<ul style="list-style-type: none"> Noted

ANNEXURE F: RECREATION

Comment	Response
<ul style="list-style-type: none"> Mountain bike tracks for children in lower Tokai will add to traffic and will only serve the needs of a few. 9b 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> There is no provision for first aid or medical facilities in the area. 60 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Trails, which are out in the open, dry out and degrade and erode much more quickly than those under pines, which are protected by the dense carpet of needles and the shade. Will this mean that the mountain bike trails will be covered by paving as is happening to the sandy paths in Silvermine which used to be a pleasure to walk and run on, but are now unpleasant, hazardous and visually intrusive. 60 	<ul style="list-style-type: none"> It is correct that pine needles do protect certain paths on level areas. However the extent of erosion if the pines are removed will depend on various factors such the nature of the soil, rehabilitation of indigenous vegetation etc. Hard surfacing of paths is only applied in very erodible soils such as the sandy areas in Silvermine where serious gully erosion was occurring and therefore the need to stabilise with hardwearing rock.
<ul style="list-style-type: none"> The proposal that advanced rider retain their original riding area not provide adequate terrain to handle the increase in Mountain bike numbers and provision needs to be made for future growth. 97 The proposed skills area will alleviate a lot of pressure on the upper forest in terms of illegal trail building. Consider placing this area near the new parking area as it could generate further income to current/ future concession holders and become a popular attraction. 97 	<ul style="list-style-type: none"> It is anticipated that through the provision of an advance course and a separate kids area, the capacity would be increased. A balance should however be maintained to accommodate other users as well and the sole intention is not to “flood” the area with mountain bikes.
<ul style="list-style-type: none"> The proposed novice/kids areas is a very welcome addition. There is currently no provision in SANParks for this type of riding. 97 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> It would be appreciated if some shaded areas can be retained on the MB trails. 97 	<ul style="list-style-type: none"> Noted
<p>Recreational Landscape</p>	
<ul style="list-style-type: none"> The plantations in both Tokai and Cecilia should be retained to provide for a shaded recreational area i.e. to walk dogs, walk, hike, mountain bike, horse riding and picnic, spiritual reflection and mental health. 101, 94, 92, 86, 82, 80, 77, 75, 72, 71, 69, 68, 67, 65, 45,43, 42, 41, 40, 39,37,36, 35, 32B, 32A, 31, 23, 20A, 19, 18, 16D, 13B, 11, 9B, 7, 5B, 5A, 4, 1, 50, 53, 59, 54 	<ul style="list-style-type: none"> As has been stated repetitively from the outset of this process, the decision to phase out commercial plantations at Tokai and Cecilia was taken by National government, not SANParks. SANParks was assigned the management of the lease permitting MTO to harvest the trees over 20 years. The assignment flows from the original Cabinet decision that the Cape Peninsula Protected Natural Environment (which includes Tokai and Cecilia plantations) be managed by a single

ANNEXURE F: RECREATION

Comment	Response
	<p>conservation authority (SANParks) as part of the TMNP.</p> <ul style="list-style-type: none"> The draft MF provides for all recreational activities currently undertaken in Tokai and Cecilia to continue. However, for biodiversity reasons explained in Annexure B and D, restoration of indigenous threatened vegetation is a priority.
<ul style="list-style-type: none"> The planted shaded area indicated in the MF for Tokai is not large enough and will result in overcrowding making it unpleasant for users. 92, 83, 82,10, 9B, 54, 60, 83, 103 Freedom of movement will be restricted if it is only allowed on specific paths. 83, 9B Recreational activities can be accommodated in the City of Cape Town’s Constantia Valley Green Belt, and in Newlands Afromontane Forest. 63, 7, 3C The plans of the lower forest shown on Figure 1D and 2 show areas of “Planted Shaded Areas” and “walk, Dogs, Horses, Mountain Bike” that are different, which indicates poor understanding of of planning and intentions. 92 	<ul style="list-style-type: none"> The intention is that the whole area is still available although some areas will be restricted to paths which can result in a reduction of actual distance of walks. Most people do however remain on “paths” in the current plantations of upper Tokai and Cecilia. When the layout of paths is undertaken, consideration should be given to potential links to the City open space system. A survey regarding the availability of open public space for urban recreational activities in the Tokai and Cecilia area indicates that the city open space system does provide sufficient, (in fact over-provides) area in terms of the population-open space ratio.
<ul style="list-style-type: none"> The shaded hikes from the Tokai/Cecilia area are uniquely appealing especially in summer. If it is possible to retain the forests as well as preserve the indigenous flora then this would be first prize. 103, 1B, 1, The plantation is a wonderful shady place in which to walk and some way to be found for the lower Tokai Plantation area to be a mix of connecting shaded areas interspersed with fynbos. 28, 27, 26, 12B, 61, 103 	<ul style="list-style-type: none"> Noted the planning of shaded walks to be considered in amendment of Management Framework
<ul style="list-style-type: none"> Access to the proposed planted area in lower Tokai is restricted. 83 	<ul style="list-style-type: none"> The area will be accessed from Orpen Road, either directly at the edge of the planted area or via the rehabilitated area. The proposal thus does not change the access to the area.
<ul style="list-style-type: none"> No plantations should be allowed or entertained within the Critically Endangered Ecosystems within the Table Mountain National Park: Any plantations advocated should be relocated into less threatened ecosystems - such as Sandstone Fynbos (Least Concern) – within the park, after due studies to ensure that Red Data List species and critical habitats are not compromised. 3C 	<ul style="list-style-type: none"> The draft Management Framework accommodates the need to restore CFSF with the last to be harvested compartments providing shade for recreational activities at that stage.

ANNEXURE F: RECREATION

Comment	Response
<ul style="list-style-type: none"> In my opinion the draft MF retains adequate shady sites in the arboretum and the picnic sites, and additional shade will result from the future restoration of riparian areas that support taller riparian scrub vegetation. 63 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Indigenous trees do not provide sufficient or similar environment for recreation and therefore areas should be replanted with pines. 98, 87, 27, 24, 59, 101 An important aspect is the loss of trees as shady non-sensitive areas with little or no undergrowth where the public can freely “romp” with children and dogs. Therefore the idea is supported to replant recreational areas with quick growing non-endemic and even exotic non-invasive vegetation to re-establish the same sort of area that the public has historically enjoyed. Replanting of invasive and ecologically damaging pine trees is of course not an option. Silvermine is good example of non-endemics which can be planted. 91 Replanting with indigenous species of trees seem to be totally impractical for numerous reasons not least of which the only areas suitable for replanting are in wetland/seepage areas and not one single tree species indigenous to the Tokai area has been identified which is suitable to replace pines as a secure, shady landscape. 6, 9B Replant plantations with indigenous trees to provide shaded areas for recreation. 78, 16B, 4, 	<ul style="list-style-type: none"> The answer is not an either or, but rather a site specific response to the requirements of shade in particular areas versus the requirement to rehabilitate threatened ecosystems. For example, a different mix of types of shade trees is appropriate to the picnic area as compared to extending the Arboretum or providing shaded walks in lower Cecilia. This may include both indigenous and non-invasive exotic trees and will be determined by further investigation.
<ul style="list-style-type: none"> The use of the rehabilitated Afromontane zones for recreation is not practical; as they are located too far up the mountain for many people to access with ease. These areas are not suitable for many of the recreational user groups due to their inaccessibility. 83 The intention of resuscitating Afro Montane forest on the upper slopes and then permitting high impact recreation activities appears to be farcical and totally in conflict with all the effort that the Park and SAFCOL previously put in to prevent mountain bikers from utilising the Donkerboskloof. 6 There is no natural Afromontane within Cecilia or Tokai that will 	<ul style="list-style-type: none"> The intention is not to force people who walked in Lower Tokai to now walk on the upper slopes. Different recreation environments are created for different use requirements. Shaded areas on the higher slopes are intended for people who would have used this area in any event.

ANNEXURE F: RECREATION

Comment	Response
<p>accommodate easy walking, nor is there any to be restored. Secondly, it ignores adjacent systems. 83</p>	
<ul style="list-style-type: none"> The current Oak trees on the boundary between the agricultural land of the market gardens on the west side of A15 can be maintained (with judicious pruning), as their shade is confined to the boundary road/path. Similarly, two or three rows of Ironwood, Yellowwood and White Stinkwood in the fire belt on the south side at Dennendal, Almora and Maryland streets will allow for shaded walks within the fire belt while at the same time forming a screen to hide the residential area from the view of walkers within the reserve. On the lower boundary of Cecilia the Cork Oak Avenue can also be used as a fire belt. 3C 	<ul style="list-style-type: none"> Noted to be considered.
<ul style="list-style-type: none"> Fynbos pose risks e.g. ticks, snakes etc to recreational users and are not suitable for recreational purposes. 9b, 20a Provision for sport and recreation such as hiking, riding and cycling in the proposed management plan needs drastic revision. Open Fynbos is harsh, hot and wind-swept, without shade in summer, exposed in winter, simply not suitable for recreation purposes such as school study outings, children’s parties, walking and just relaxing and rejuvenation. 54, 59, 87 Restored natural systems are not as sensitive as indicated and do not warrant many rules for users. More effort should be spent on educating the public to appreciate these natural systems, make fewer rules and strictly enforce them. In the long term the public should get the feeling that they have gained much more than they have lost. 91 	<ul style="list-style-type: none"> The draft Management Framework accommodates the current recreational activities in Tokai and Cecilia. In terms of biodiversity restoration requirements, the extent of planted shaded area will decrease over time as compartments are harvested. In addition, the City’s public open space system provides for recreational and group uses as well.
<ul style="list-style-type: none"> The restoration of restoration to support CFSF and Peninsula Granite Fynbos is supported. Careful consideration and planning and consultation with biodiversity experts and urban planners is essential to determine the optimal balance between and sites for shaded trees and fynbos. The high amenity value of the land should thus be retained, along with its biodiversity value. 96 	<ul style="list-style-type: none"> Noted. Action plans to include more detail on process to be followed when detail planning of paths etc. is undertaken.
<ul style="list-style-type: none"> Controlled footpaths along restored riparian corridors can be allowed. 102 	<ul style="list-style-type: none"> Noted to be considered

ANNEXURE F: RECREATION

Comment	Response
<ul style="list-style-type: none">• There is no reason to separate recreation users, as no conflict exists. 16c, 46, 61, 60	<ul style="list-style-type: none">• From comments and complaints received from the general public as well as discussions with Tokai/Cecilia recreational user committees, many conflicts exist between the various recreational users, in some areas more than others.
<ul style="list-style-type: none">• No need to stabilise footpaths, bicycle tracks etc. 28, 31, 38, 60	<ul style="list-style-type: none">• Some single tracks and other paths need stabilisation because of erosion and rain damage, especially those utilised by mountain bikers and horses.

ANNEXURE G: ECOTOURISM AND ECONOMIC DEVELOPMENT

Comment	Response
<ul style="list-style-type: none"> • Creation of a eucalypt woodworking industry for furniture etc may go a small way towards addressing some of the problem with smaller trees. It would be an employment creation project with significant spin-offs. • Proposal for an aerial cable tour through a small section of the plantation will compliment the conservation, recreation, ecotourism and job creation policies that are currently being developed for the park. 51 	<ul style="list-style-type: none"> • TMNP already uses wood sourced from alien trees in the construction of hiking trail camps and for boardwalks. • Aerial canopy tour could be considered as an option to be investigated during precinct planning.
<ul style="list-style-type: none"> • Economic development is critical to the management of state land and need more attention in the Management Framework. 15 	<ul style="list-style-type: none"> • Noted. To be expanded on in the objectives and actions.
<ul style="list-style-type: none"> • Replanting the plantation will provide a steady income for the park. The economic impacts of exiting plantations should be assessed. 16c, 28, 71, 73, 84, 87 • An EIA or SEA should be undertaken to establish the economic impact before SANParks can take a decision on exiting the plantations. 73 	<ul style="list-style-type: none"> • As has been stated repetitively from the outset of this process, the decision to phase out commercial plantations at Tokai and Cecilia was taken by National government, not SANParks. SANParks was assigned the management of the lease permitting MTO to harvest the trees over 20 years. Harvesting plantations is not a listed activity in terms of the EIA regulations. Various other areas in the Western Cape have also been exited without an EIA or SEA or any public input.
<ul style="list-style-type: none"> • The exiting of forestry will result in job losses in the forestry industry especially in the lower socio-economic groups. 73, 95 	<ul style="list-style-type: none"> • The wider economic impact of exiting forestry in the Western Cape was considered by DWAF and will not be discussed in detail in this section other than to mention that (1) the 560ha of plantations of Tokai and Cecilia contributes little to the larger forestry sector in the Western Cape and (2) both conservation management and eco-tourism has apart from direct job creation significant downstream economic benefits. • The assumption is made that no jobs will be created by changing the plantations to a rehabilitated natural area hosting recreation and eco-tourism. This is not the case. Environmental rehabilitation, alien vegetation management, visitor management will create new jobs. • The Management Framework specifically refers to the preference to jobs be given to local people as well as job creation within the eco-tourism sector, the development of job opportunities.
<ul style="list-style-type: none"> • MTO support the continuation of commercial plantations for the 	<ul style="list-style-type: none"> • Noted



ANNEXURE G: ECOTOURISM AND ECONOMIC DEVELOPMENT

Comment	Response
<p>purpose of timber industry and is of the opinion that forestry and conservation are not mutually exclusive. 73</p>	
<ul style="list-style-type: none"> • Enlarging the picnic site while welcome is going on to create traffic access problem. Major road works will be required to create safe access. The suggested access via the Stone Church is already dangerous and is already frequently congested when there are large funerals or weddings taking place there, with the attendant waiting buses causing further congestion on Orpen Road. It is very unsuitable for the high volume of traffic that travels to the picnic site. Orpen Road is also heavily used by runners and cyclists and crossed by horse riders all of which add to the traffic hazards. Will a new enlarged and improved picnic site also result in greatly increase cost to the users as has happened in other area? Will the picnic area actually be larger once the existing area is incorporated into the fynbos corridor? 60 • The proposed high intensity leisure area in the vicinity of the Manor House will create similar traffic problems as the existing road access is totally unsuitable for high volumes of traffic and large vehicles. The avenue of oaks has heritage status and thus may not be felled to widen the road. If the fynbos in this area is so critical threatened why do SANParks plan to use up so much space for tourist facilities, and their own administrative facilities. Surely this sort of high intensity leisure and administrative use would be better developed in areas not so critical threatened. SANParks could have their admin and research facilities in any existing business area. E.g. Westlake where they are currently. 60 	<ul style="list-style-type: none"> • Detailed precinct planning will consider new access routes.
<ul style="list-style-type: none"> • A large number of the public highly value the current location of the Tea Garden because of the numerous large, old and beautiful trees and the unique forest atmosphere, which is ideal for people from all walks of life, from the very young to the very old. It is also a highly popular venue for children’s parties, for which the facility has to be booked months in advance. Its very simplicity adds to its appeal. There are enough highly commercialized tea gardens in Cape Town, and hardly any simple natural venues like this one. Though it could be upgraded, it should not lose its quiet rural simplicity, and it should not be relocated. However, there is also a real need for an 	<ul style="list-style-type: none"> • To be assessed in more detailed precinct planning.

ANNEXURE G: ECOTOURISM AND ECONOMIC DEVELOPMENT

Comment	Response
<p>Interpretation Centre in the Arboretum as the wonderful educational and heritage potential of the Arboretum is currently not realized. There is enough room in the area for another similar building to be constructed nearby and used as an interpretation centre. The two could in fact superbly complement one another: Visitors to the Tea Garden could come and educate themselves and their children about the scientific and heritage value of the trees in the Arboretum, and other interesting or important aspects of the area. Special trails could be devised for this as well. And visitors to the Interpretations Centre could visit the Tea Garden afterwards for refreshments. To relocate the Tea Garden to the planned visitors centre will completely nullify its value. It will become just another tea room, in the same way as the old thatched tea room in Kirstenbosch was demolished, and replaced with a new tea room (near the top gate) with about as much atmosphere as a hospital canteen. Many people still talk about the lost charm of the old thatched tearoom till this day. 76, 86</p>	
<ul style="list-style-type: none"> For most people interviewed the pine trees are the central focus of a family tradition, and are therefore an issue of cultural heritage. Even if it becomes unavoidable for the lower portion of the picnic site to be felled, a suitable alternative portion could be added, for which I have indicated a proposed area on the attached map, where the current pine trees could be thinned out. In addition, the section of the picnic site which is currently unplanted is a wasted space as no one picnics there. This area could be planted with pine trees, as the results from the survey clearly show that this is what 92% of the patron's prefer. This will also make up for losing the lower part of the picnic area. The remaining pine trees in the picnic site should not be felled until their age requires it, and the area should then be replanted with further pine trees. 76 	<ul style="list-style-type: none"> The same size picnic area is to be retained although in a re-aligned form.
<ul style="list-style-type: none"> The bridle paths (which also act as fire-breaks) that run along old Orpen Road and along the edge of Forest Glade should be retained. The existing stables in the planned Visitors site are a wonderful feature and should be preserved and utilized, for organized out rides in the area etc. The rural ambiance of Tokai should not be destroyed by commercializing the area. The plan to "develop Tokai as a 	<ul style="list-style-type: none"> The intention is to retain link paths such as the bridal paths. The CDF provide for gateways of different scale and the intention is not to create another "Cape Point."

ANNEXURE G: ECOTOURISM AND ECONOMIC DEVELOPMENT

Comment	Response
<p>gateway to the park by placing high intensity opportunities in an identified visitor site and to channel access through this site” indicate a plan to highly commercialize the area. Many Tokai residents and visitors to the area do not need or want Tokai to become another “Cape Point”. There are enough tourist attractions and curio shops all over the Peninsula. Many residents and visitors do not need or want more of these destroying Tokai’s quiet rural ambiance. Any developments made to the area, including the addition of buildings, or alterations to the landscape, should value, promote, incorporate and protect this valuable aspect of Tokai, rather than diminish or destroy it. 76</p>	
<ul style="list-style-type: none"> • The plan to restore and preserve the neglected Tokai Manor House is most desirable, as long as its historical; integrity is not compromised. It is not desirable that it become highly commercialized, modernized or artificial, or that any development to its surroundings detract from its historical character. A great part of the value of the Manor House lies in the scenic beauty of the surrounding landscape; not only the forested mountain backdrop, but the surrounding open pieces of land with trees, some older alien trees, and particularly the oak trees. Cape Dutch architecture and oak trees are synonymous with the historical heritage of the Cape. Therefore many of the trees and pieces of open land should be preserved and integrated into any development, and the landscape should not be defaced with large parking areas for tourist coaches etc. Any buildings added should be designed and constructed in a similar and harmonizing style. Tokai Road leading up to the Manor House is a beautiful feature in itself. It is very heartening to read the recommendation of Geostratics that any upgrading and maintenance of the road “must not harm the historic avenue of oak trees in any way.. etc”. In the same way, to harmonize with the avenue of the oaks, the eucalyptus and other trees that line her lower section of the road, should also be preserved. The impact of felling on the road is described as low. This is however not true, as a great part of its beauty lies in the trees that line it on either side. Therefore as many as possible of these should be preserved along both sides of the road. 76 	<ul style="list-style-type: none"> • Noted to be considered

ANNEXURE G: ECOTOURISM AND ECONOMIC DEVELOPMENT

Comment	Response
<ul style="list-style-type: none"> If the Arboretum is to be retained (or even expanded), it occurs to me that it could be put to better use. For example, it could be used as a new picnic site (perhaps a little more upmarket!) to which entrance fees are significantly higher than for lower picnic site. If this is the course of action is taken, I would argue that the proposed expansion of the picnic area in the Sandplein fynbos are should be reconsidered, or that (at the very least) some of the existing picnic area is cleared to form a riverine corridor from granite to Sandplain fynbos. 93 	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> The proposed conversion of the area around Tokai Manor House, moving of the Tokai picnic area, and eviction of some of the residents of the Forestry Village, is appalling. Its presently rural character will be destroyed by “upmarket” visitors facilities. But I have no objection to a moderate restoration of the Manor House itself into a TMNP headquarters; I do not favour large increases in parking facilities, closure of the horse – stables and focusing tourist activity there. The present rural character of the Arboretum and its approaches is extremely valuable as it is now; it does not need upgrading! 86 	<ul style="list-style-type: none"> In preparing precinct plans further consultation with stakeholders will take place. No residents of the ‘forestry village’ can be summarily evicted as SANParks has to follow due process in dealing with tenants.

ANNEXURE H: MANAGEMENT AND MONITORING

Comments	Response
<ul style="list-style-type: none"> • Fully supports the draft MF conclusion that ‘ It is recommended that the clear felling schedule be re–assessed to create viable restoration pockets’ and goes further to recommend that clear felling in the acid sandplain areas should be re–assessed in terms of the available resources to manage the restoration post clear felling. 6B • Where areas have been cleared of alien vegetation or plantations harvested SANParks has not yet demonstrated their ability to rehabilitate these areas. 9b, 48, 60, 83 • The MF does not consider the cost and difficulty of rehabilitating the plantation areas. This will not just be a once off operation but will require follow-up for many years and will add to the already huge programme of removal of alien vegetation which SANParks are struggling with. Reducing the size of areas rehabilitated makes sense. 66b 	<ul style="list-style-type: none"> • The Management Framework will inter alias assist the management of TMNP to establish the required capacity, plan and budget to provide the capacity. • The Management Framework will inter alias assist the management of TMNP to establish the required capacity, plan and budget to provide the capacity. Capacity is furthermore not solely within TMNP but also sourced through other Government funding initiatives such as Working for Water, Working for Wetlands, Working on Fire, DEAT Social Responsibility programme, DEAT Infrastructure programme and other initiatives. TMNP can demonstrate its capacity through examples such as the successful rehabilitation of Orangekloof, Newlands, Silvermine etc.
<ul style="list-style-type: none"> • People living in the forestry villages have already expressed their dissatisfaction at the likelihood of being removed from their homes. Many have expresses the desire to purchase these homes given that they have lived there for over thirty years. They have a strong case in their favour. For SANP to think that leases can be terminated and that will end the matter is to fail to take cognisance of the reality of South African land reclamation and entitlement issues. 9B 	<ul style="list-style-type: none"> • The land is State land, managed as a National Park and cannot be sold. • All tenants on SANParks managed land are dealt with fairly in terms of the law.



<p>Specific proposals: The specific proposals listed hereunder are extracted from the comments submitted by various I&APs and will be considered in the review of the draft Management Framework. These comments will be responded to in the final Management Framework.</p>
<ul style="list-style-type: none"> • The research facility must be blended into the environment so as to require the minimum loss of surrounding area for fire belt fire protection. This is a major problem in that the buildings will be an eyesore within a Fynbos environment. Any attempt to soften the buildings by green landscaping will increase the fire risk to the facility and thus require larger fire belts, which will destroy the corridor in which it sits. If there is any chance of moving the research facility elsewhere and removing "Bosdorp" from the corridor this must be seriously entertained. Alternatively, the building should be fire hardened so as to be capable of surviving a fire right up to and between the buildings. The facility could thus double up as a practical demonstration of a building design compatible with Fynbos fire requirements. This will require removing overhanging eaves and guttering, installing fire shutters at windows and doors. The footprint should be kept free of Kikuyu grass and other alien invasive plants and no gardening that requires supplemental watering should be included. Aloes, Sour fig and Crassula could be used to provide fire-safe vegetation immediately adjacent to the building. Argentine Ants will have to be actively managed and eliminated. Adequate notices to this regard will be required where short-term and contract researchers are operating. Refuse bins should be both baboon and Argentine Ant safe, and preferably all waste moved offsite daily. A monitoring programme for Argentine Ants around the facility must be maintained. 3C
<ul style="list-style-type: none"> • An attempt must be made – jointly by SANParks, City of Cape Town and SANBI, to procure a second corridor between the mountains and the lowlands connecting C3 with A7a on the northern portion of the Porter Estate. This should be initiated as a matter of urgency. This corridor should be 400-500m wide. With regard to the rehabilitated shady areas: see notes under Figure 1B. 3C
<ul style="list-style-type: none"> • A further possibility to improve the functioning of the Soetvlei Wetland, which should be given serious consideration in the Management Framework, is the desirability of diverting or bifurcating the already diverted channel of the Prinsesskasteel in the Lower plantations (where the river does a sharp right hand bend at the eastern end of compartment A14b to run between compartments A14a and A14c). During major floods, experience has shown that the river breaches its banks here and flows down the road before diverting left to flow through compartment A16a back into the Soetvlei. If naturalised, this could revitalise Soetvlei. And take pressure off the breach in the koffieklip along compartment A19b which is detrimentally draining the acid Sandplain fynbos water table. Management framework guidelines also need to be developed for Compartment 9C which is a major catchment drainage area which used to be fed from a stream, now channelled north of the Chrysalis sports field, via a series of stormwater drains running above the access road for the Stone church to sports field. (See section 4 below: Ecological Corridors). This compartment would appear to be one of the very few in the lowland areas suitable for resuscitation of riverine and/or Afro Montane Forest habitat. (Ref Annexure D; Guidelines for replanting trees). 6B
<ul style="list-style-type: none"> • The Source to the Sea management framework details the priorities for the main Prinsesskasteel from the mountain catchment areas through the Constantaberg kloofs, the Arboretum, Visitor Centre Area, under the Manor House approach road, through the re-channelled stream in the Picnic area and lower plantation. FOTF fully supports this unique challenge and encourages the TMNP to give high priority to taking the initiative in forming the necessary forum and partnership with the Province, City, other landowners, funders and community organisations to give major impetus to the Source to the Sea project. The first step is the appointment of a funded project manager to drive the process. 6B
<ul style="list-style-type: none"> • The draft Mf has concentrated attention on the plantation below Orpen Road or Acid Sandplain fynbos restoration. The FOTF initiative for



ANNEXURE I: LANDSCAPE AND PRECINCT PROPOSALS

<p>this area with CEPF funding to develop a management plan, acceptable after public process, for the area, identified the expansion of Sandplain fynbos to 15 to 20 ha in the Lower Plantation over the next 15 to 20 years. This left some 43 plus ha of shaded compartments in various stages of growth, which were networked with new paths and bridges prior to clear felling. Bearing in mind the guidelines in Annexure b, it is probable that an expansion of the Sandplain fynbos restoration to some 30 ha, in minimum compartments of 5ha for proper fire management, would be acceptable to the community in general. This would still leave some 33ha for the maintenance and development in various stages of shaded areas for recreation, landscape, wind alleviation, fauna, commercial forestry, etc. It would also appear that Compartment A9e above Orpen Road is ideally suited for additional priority Sandplain restoration which would also contribute to improving the functioning of the main ecological corridor.</p>
<ul style="list-style-type: none"> • It would appear from the Draft MF and discussions between TMNP management and the consultants, that the intention is to concentrate on the area around the Bosdorp and the old Picnic forest (Compartments A2, A4a, A12 and A11) to create an ecological corridor between the Granite fynbos A1) and the acid Sandplain below Orpen Road. In FOTF's opinion, this corridor has two major disadvantages. Firstly it has to cross to major roads (Tokai Road and Orpen Road) and, secondly there are no streams/seeps in this area or culverts, which could allow fauna to cross under roads. Basically, this area has little ecological to commend it as a corridor from upland to lowland. It could however have some merit as a supplementary corridor to a more ecological route. 6B
<ul style="list-style-type: none"> • As covered in Section 2 above, the main riverine system runs above the Picnic forest (A4a) and to the north/west (A5, 6, 7, 8, 9 and 10). Taking the existing route of the Prinsesskasteel stream, which flows under a major bridge over Tokai Road below the stables and above the Picnic forest, it is quite feasible to create a 150m wide ecological corridor which can then run through the undeveloped Porter area to the north of the new Visitor Centre to link with compartments A5, run below the access road to the Stone Church, link with the corridors following the drainage lines through compartments A9 and A7 as well as the Prinsesskasteel stream, and the run through 4 culverts under Orpen Road to the Soetvlei wetland, the Ondertuine and the Lower plantations acid Sandplain, thence to the Keyser's river under the Blue Route. 6B
<ul style="list-style-type: none"> • The resuscitation of riverine forest in compartment A9c and Acid Sand plain in A9e ... will materially add ecological biodiversity value to this corridor. 6B
<ul style="list-style-type: none"> • This would also obviate the necessity for the apparent plan to fell most of the Pinus pinasters in the main Picnic area, which, to the untrained observer, appear to have reasonably high prospects of survival, with proper maintenance, for a long time to come. It would seem that a relatively small area, say on the SE side of compartment A12 from the picnic access gate to the eastern ablution block could be cleared to create a corridor. Also a small area could be cleared on the northern boundary of A4a along the stream. The Picnic site could then be expanded with planting of broad-leafed species.6B
<ul style="list-style-type: none"> • Following the removal of small portions of the Pinasters from Compartments A12 and A4a to improve the ecological corridors, as recommended above, significant areas already planted with either pines or broad-leafed species, could be added relatively easily. This expansion would add not only capacity but also diversity to the Picnic Area. Without detailed consideration, it would at first sight appear that an ecological corridor and fauna control zone of about 150m could be created north and above Orpen Road from Compartments A10 to A13. Significant areas of 10e and A11 could then be added to the e Picnic Area.6B
<ul style="list-style-type: none"> • Consideration could be also be given to the feasibility of creating an upmarket catered picnic are (along the lines of Vergelegen) under the camphor's and redwoods in compartments from the bottom portion of A5f (after allowing for the ecological corridor) to A10c. The surplus Orpen Road forestry cottage could possibly be used for this purpose (See 6 below). 6B

ANNEXURE I: LANDSCAPE AND PRECINCT PROPOSALS

<ul style="list-style-type: none"> • It appears from discussions that this cottage is surplus to requirements. Although it is apparently very cold and damp, it has some beautiful trees, excellent access for limited access to Orpen Road and is well placed as a central focus point for the lowland biodiversity interest areas and the potential upmarket catered Picnic site in the camphor's in A10c discussed above. Suggestions for, possibly multi-faceted use, could range from a reception/ kitchen/ ablution area for the picnic area; accommodation for volunteer researchers; head quarters/information centre for volunteers such as Friends Groups, Botsoc, Birdlife, WESSA, Cape Flats community groups etc. 6B
<ul style="list-style-type: none"> • The potential for continuing existing recreation activities in secure, shaded, and relatively flat lowland areas is greatest in the compartments below Orpen Road and the area above Orpen Road surrounding the expanded Picnic Area from the Stone Church to the Visitors Centre and through the new corridor between Bosdorp/Forest Glade and the Picnic Area. 6B
<ul style="list-style-type: none"> • In this area there are portions of many plantation compartments which were either previously planted with eucalypts or where pines were felled after the 50 year maximum recommended in Annexure B (offhand these compartments in the Lower Plantation include; the southern side of A15 adjacent to A18c, the south of A16a, portion of 18c, most of A19c, all of A14ab&c, A17b which used to be a mule camp (?); and in the upside of the road, A7a as well as numerous areas under areas planted either with eucalypts or broadleaf species or even arboreta such as A7a, A9c, A5, A10 or A6 which is replanted sports field. Old access roads such as between A10b and A13 and the Stone Church to the visitor Centre are tarred avenues. 6B
<ul style="list-style-type: none"> • It would therefore appear to be a relatively simple matter of detailing a varied network of broad shaded area corridors running throughout these low impact recreations areas to create publicly acceptable pathways for activities such as dog walking and horse riding and for geriatrics and infants. These shaded areas could be a mixture of continuing commercial forestry activities (which should be economically viable), existing avenues and treed areas, resuscitated riverine forest, copses and new planted shaded areas (possibly funded as memorials to pets or people). FOTF has many suggestions in the regard, which they would be delighted to develop in co-operation with TMNP management. 6B
<ul style="list-style-type: none"> • The resulting diversity with walking areas through areas varying from acid Sandplain, riverine forest, monoculture pines, riparian zones, alongside camphor and redwood forest, wetlands and intermittent views of majestic mountains from Devil's Peak to Steenberg with be a world-class experience for whom many will be prepared to contribute voluntarily. This network could also encourage non-motorised traffic to enjoy and contribute to the economic functioning of the adjacent Visitor Centre activities. 6B
<ul style="list-style-type: none"> • FOTF supports the concept of the rehabilitation of the Bosdorp as a Research Centre and accommodations for SANParks researchers and visiting scientist as proposed on P32. The concept of limited tourist accommodation in the three cottages above the Bosdorp, south of the Prinsesskasteel being rehabilitated as limited tourist accommodation is also supported. 6B
<ul style="list-style-type: none"> • Based on FOTF's continued in principle objection to any rezoning which conflicts with the approved 2001 Pensinsula Urban Edge Study, FOTF can not support any new housing development in compartment A8b regardless of who will be housed there. Similar objections would be grounded on the sensitivity of the site between and above critical wetlands and traffic and scenic drive considerations. FOTF would therefore be not support any alternative new housing footprints above the Urban Edge. 6B
<ul style="list-style-type: none"> • FOTF supports the MF concept as listed in 4.4.1.1. on page 30 which is entirely consistent with the vision that FOTF has propagated for many years for this combined precinct of the Porter Estate and Tokai Plantations. We would go further and recommend that the unused Porter open land behind the current TMNP office and the Chrysalis sports field, which is an important ecological corridor, also be considered for inclusion in this visitor centre. Possible uses are the Touch Farm concept proposed in the Porter Development Framework and careful use as an additional access to the visitor Centre for traffic from the north to take pressure off the Tokai Road access which is already over

ANNEXURE I: LANDSCAPE AND PRECINCT PROPOSALS

<p>trafficked. 6B</p>
<ul style="list-style-type: none"> • The new vision was unanimously agreed for the Arboretum ‘To be a resource for education and recreation’. An Outcome Based Education was then in its formative stage and a partnership was formed with the NBI Goldfield’s Environmental Centre at Kirstenbosch and the Kirstenbosch horticulturalists. Teacher workshops were held in the Information Centre and education resource materials and an interpretative trail developed to assist schools with OBE. Many school visits were supported and a SAFCOL FOTF was formed to bus in children from Lavendar Hill and other Steenberg schools for OBE activities. The Arboretum became an important resource for the first Youth Environmental School (YES) now held annually at Chrysalis Academy. Regrettably, the closure of the classroom and information centre, materially assisted the demise of this initiative along with the formative education problems with OBE. 6B
<ul style="list-style-type: none"> • FOTF considers that the time is ripe to re-introduce education as an underpinning vision along with ‘soul food’ recreation in the Arboretum. It is considered that the continuance of a very low key Tea Room is a value adding activity to the main education and quiet recreational resource. 6B
<ul style="list-style-type: none"> • The Arboretum is the home of forestry in South Africa and the development of the Arboretum was closely linked with other forestry in similar climatic zones. Many of the trees originally planted here stem from Gondwana countries. The Arboretum probably has the finest collection of Gondwana species in the Southern Hemisphere. It is world renowned as is evidenced by the two visits which the renowned international tree expert and author has made to the Tokai Arboretum in this year to photograph trees. Regrettably, on his last visit, the uncontrolled invasion of the undergrowth was such that he was unable to take photographs. 6B
<ul style="list-style-type: none"> • FOTF therefore considers that priority should be given in the MF to re-instating the Information Centre and Classroom while maintaining a very low key Tea Garden facility. Focussing on information material and self guided interpretative trails and reconsidering the Tokai Arboretum with the theme of the “Gondwana Arboretum”(including Afromontane trees of the Cape Peninsula). For this purpose, the Arboretum could be expanded south of the parking area towards the Prinsesskasteel River. The existing parking area should be retained but be limited to parking for the Arboretum and hiking through the Arboretum to the upper slopes. The Arboretum should also continue to be used for a venue for appropriate community activities such as the annual “Carlos in the Arboretum” as a community service and fundraising opportunity for the development of the Arboretum. Special care must be exercised to ensure that Arboretum does not develop into an easy source of food for baboons. 6B
<ul style="list-style-type: none"> • It is probable that most of the picnic traffic will originate from east and south; i.e. accessing the Picnic area via Tokai and Steenberg Roads. There is no point in first diverting this traffic north along Orpen Road to an alternative new access point as is discussed in Alternatives 2 and 3. Alternative 1 therefore has to be the main access for the Picnic area. Upgrading of the Tokai Circle is already a necessity and widening after Zwaanswyk a very good suggestion. The later will however work against the apparent preferred option of an ecological corridor through the Bosdorp zone. (See section 4 above). There could be significant merit in pursuing a combination of Alternative 1 and Alternative 3 with the “Gateway” being the Visitor Centre. In this way, traffic to Chrysalis Academy/Upper Porter and from the north along Spaanschemat and Firgrove Roads could access via the Stone Church gate. This would take considerable pressure off the Tokai Road access. 6B
<ul style="list-style-type: none"> • The Management Framework needs to give high priority to the restoration of the main hiking trails on the Constantiaberg, all starting from the Arboretum, which have steadily deteriorated over the past few years. The priority trails in the opinion of FOTF are; The Elephant’s Eye Trail: this is the most popular trail and is very well used especially by the community of the Cape Flats. There is a strong sense of ownership by people who look up to the mountain and see the Elephant’s Eye cave. We believe that there is also a wonderful heritage

ANNEXURE I: LANDSCAPE AND PRECINCT PROPOSALS

<p>celebration opportunity to be made by linking the old name of the cave Prinsesskasteel (reputably named after a Khoekhoen chieftainess's mountain retreat) with Prinsessvlei (which may have the same derivative) and certainly could be credibly related to legend of Prinsess's abduction by pre-colonial mariners while bathing in one of the vlei's on the Cape Flats (See Jose Burman's Safe to the Sea published circ 1950). Similarly The Prinsesskasteel river trail starting above the Arboretum should be renovated (Izak, an old forestry worker did a magnificent job in creating a trail in the mid 1990's: "Izak se Pad"). This trail needs to be linked to the Waterval trail, which comes off the Silvermine escarpment to the south of the Prinsesskasteel kloof and provides a wonderful round trip hike when combined with the Elephant's Eye trail. The Constantiaberg contour trail, which starts on the Elephant's Eye trail on the buttress above level 5 should be renovated and linked to the hiking trail which goes up through the magnificent Afromontane forest pocket in Donkerkloof. This would provide a link to the Vlakkenberg trail as well as the trail to East Fort in Hout Bay via the Manganese mines or to Skoorsteenkop. FOTF considers that these three trails should be Tokai TMNP flagship trails. 6B</p>
<ul style="list-style-type: none"> • A further issue regarding the narrow recreational belt is the impact of traffic. To access this belt people would have to travel through Tokai suburbia thus causing traffic congestion and dangers on sleepy suburban roads where children play. There appears to be no facilitation of parking or access in the Plan and it would be highly advisable that some form of parking access point be created on Orpen Road if neighbourhood Tokai is not to be adversely affected. 9B
<ul style="list-style-type: none"> • I sincerely do believe that the positioning of the last remaining bit off plantation be reconsidered if this is the only piece of "forest" to be left. It would perhaps be better to replant A14c in the interim, which also has a natural access point plus parking. 9B
<ul style="list-style-type: none"> • What does SANParks plan to charge for access to the new site? The Tokai picnic area is traditionally used by people from previously disadvantaged communities for whom the city's treed area is of critical importance- particularly at the level of social and psychological well-being. Should access become too expensive it is these people who will once again be disadvantaged. 9B
<ul style="list-style-type: none"> • The plan gives no indications as to how the new site will be accessed or the impact of that access on the surrounding areas. One of the proposals is to create a new access point at the Stone Church. This is, however, a dangerous section of road with two blind bends. Picnickers travelling onto it and drivers travelling along it are both put at risk if there is heavy congestion or irresponsible driving as a result of a "day out". 9B
<ul style="list-style-type: none"> • While I think it highly commendable that the Tokai Manor House be put to good purpose and maintained, I have one main concern. 'Access'. The local infrastructure of Tokai is already under massive strain, which is set to increase with the development plans above Westlake of both luxury and low cost housing. As it is traffic and congestion are major problems on and around Tokai Road and the traffic circle. If the intention is to develop a high volume visitor centre this congestion, along with incidents of accidents and road rage, will become considerably worse and the situation will be untenable. Refer to my previous point regarding access via the Stone Church. Plans to increase the volume of tourist traffic have implications, which are not clearly addressed. As stated, there is no prospect whatsoever of the current road infrastructure carrying any additional traffic load without a significant upgrade. The burden of such an upgrade would fall upon the City Council, and there is no evidence that Council has agreed in advance to commit to such upgrades. Even if the additional tourist traffic is acceptable to the local community-, which is in itself by no means evident – such plans cannot proceed without Council commitment. 9B
<ul style="list-style-type: none"> • It is envisaged that the Tokai aerial cable tour will be constricted amongst the large eucalyptus trees near the Arboretum. Aerial cable tours take place high above ground and as such will not leave a "footprint" on the forest floor nor disturb the activities, walking trails, etc that take place below. Trees will not be removed or damaged in any way and the shady forest floor will remain as it is. 51

ANNEXURE I: LANDSCAPE AND PRECINCT PROPOSALS

- Alternative route 3 appears to be the best option in terms of the entry point for the “Gateway” and diverting traffic away from the residential areas of Tokai. Alternative route 1 could continue to be the access route to the picnic site, but not to be used for the “Gateway”. Thus traffic would be spread between routes 1 and 3. 76
- As they stand at present, the forests/plantations provide a recreational area for citizens and tourists alike. With the Draft Management Framework development plans and massive reduction in usable space for all activities, SANParks now plans to attract even more people to this area and concentrate both tourists and recreational activities “in a node”. This means an increase in visitor traffic is expected to run concurrent with a reduction in space. We are also concerned about the increase in traffic Tokai, which already suffers from an overloaded infrastructure, especially after the development in the Steenberg area. The M42 and Tokai Roads already cater to a lot of traffic. 83
- Several months ago the UFGP of which I am a member, submitted to Park Management what I believe is a most reasonable offer of compromise which attempts to accommodate and improve Afromontane Forest within Cecilia and Tokai while at the same time ensuring the uninterrupted use and amenity of shade areas on the lower slopes. It also incorporated proposals by a professional Forester (Mr, Angus Wilson) for methods of ensuring a transition from alien trees to indigenous forests over along time (70 years). Further more it took into account the economic demand for good quality timber in the Western Cape. This submission was recently amplified in a supplementary document submitted by the UFGP. The primary submission has to all intents and purpose largely been ignored by Parks Management. 84
- Furthermore, substantial development of the Arboretum area for tourist purpose would seriously increase the vehicle traffic problems on Orpen Road, which is already extremely, busy due to restrictions on the use of Chapmans Peak Drive. Many commuters using Ou Kaapse Weg as a result of Chapmans issues, drive along Orpen rather than join the M3 freeway at Westlake. 86
- If the parking area for mountain bikers are moved to below the Manor House it will cause a management issue in terms of returning riders picking up speed on the descent from the Arboretum. Being a bottleneck, it will be very difficult to manage and will cause problems. A solution would be a south bound mountain bike access road that contours towards Zwaanswyk and could then switch back to loop above the Arboretum northwards toward the trail network. A loop of this nature could also make it much easier for cyclist to get up the initial climbs by providing an easier alternative. It could effectively reduce MTB vehicles and rider traffic to the Arboretum. 97
- The base of the fynbos corridor is made very narrow by this particular forested inclusion. I ask that this 'area' of forest granted us is relocated to a more accessible and sensible location, although it is understood that part of this forest would have to be maintained as fire break. 83
- Old Orpen road and its associated trees should be removed where it passes through Sand Fynbos vegetation. The tarmac should be removed and the gravel maintained in a narrower zone to form a solid surface for walking and cycling. 3C
- Orpen Road Foresters house effectively disconnects the two big blocks of Sand Fynbos and thus reduces the ecological integrity of the area. It is also a fire hazard with its thatch roof, and has far too large a garden footprint (or even if no garden, in terms if fire belt requirements). It should be removed and the area restored to Sand Fynbos. 3C