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Acknowledging the importance of Nairobi National Park to Kenya's capital and economic hub and its contribution as host to IUCN listed endangered wildlife species, UNEP wishes to make submission its initial review comments on the draft NNP management plan.

For ease of reference, the review comments are presented based on different sections of the management plan

#### General Comments

- The draft NNP management plan is largely comprehensive. However, the plan would benefit from a more integrated presentation of ideas that show a clear flow from threats section to conservation targets to priority programs, and then the linkages across the programs. For example—some of the discussions on initial threats do not clearly flow through the CAP analysis—it may be because of the nature of the conservation targets chosen. As currently presented, it seems each of the five main programmes of work may be siloed without clear links across to systemically address threats.
- Some examples of this include the fact that the tourism management programme has no priorities stated at the highest level (goals/objectives) associated with either minimizing environmental impacts on ecology of the park or reinvesting tourism income for ecological improvements. While EIAs are mentioned further down, this becomes a do-no-harm approach, rather than seeing tourism as a positive benefit for conservation. The tourism plan seems to be heavily infrastructure focused, which is ok, but is concerning without clear links to protecting the natural assets. Another example is community activities- they cut across three programs (community, security and operations). This reflects a good priority placed on stakeholder relations, but it is not clear how these different community engagement pieces are interlinked and coordinated. A lack of such coordination could actually undermine long term community relation goals.
- For better interpretation and usability of maps used in the plan, we recommend the use of better resolution images.
- Environmental Impact Assessments should inform whether or not a particular investment is made—pre-decision point (approval of the plan). As presented in the plan, it is not clear how EIAs will influence decision making on strategic investments further upstream in decision-making. An overarching EIA regarding all proposed infrastructure as a package may be useful to identify any cumulative potential impacts and inform a strategic infrastructure development package (rather than just piece by piece).
- As one that set precedence across the country, it is important the NNP management plan reflect the aspirations of, *among other national documents listed notably the KWS Protected Areas Planning Framework (PAPF), KWS Strategic Plan 2019-2024, the Wildlife Conservation and Management Act, 2013, the National Wildlife Conservation and Management*

Strategy 2030 and Kenya's National Biodiversity Strategy and Action Plan- more so in the context of Kenya's contribution/implementation of International Environmental Agreements and Standards.

#### The Plan

- Stakeholders Participation in planning- While there seems to have been some form of engagement in its development, the stakeholders participation plan-*described in page 4*, is targeted and therefore fails to offer opportunity for participation by the wider public. Especially those whose interaction with NNP may not be clearly defined. To facilitate inclusivity, KWS should consider additional mechanisms for participation, such as request for the submission of memoranda, to give opportunity for the wider public to participate

#### Major Issues of Concern

- What the plan identifies as issue 2 (wildlife population declines) is nothing but a symptom of the biggest problem the park faces, namely habitat loss and fragmentation – which the plan identifies as issue 1 – and in particular the progressive loss of connectivity with the core wildlife areas further south and east. This should be a priority focus for all work programmes.

#### Proposed management options to address the major issues of concern at NNP and adjacent areas

- We don't think the qualitative analysis that has been done is enough to decide which of the four management options (or indeed other options they have not considered) is most likely to result in the plan's objectives being achieved. The plan does not provide or refer to sufficient evidence to answer that question, and perhaps some feasibility studies should be conducted before the plan is approved and implemented. Good studies have already been conducted (see [Report on Wildlife Corridors and Dispersal Areas - Final - July 2017.pdf](#)), but they either have not been taken into account or the level of ambition has been kept deliberately low in the plan. The trouble is, the effective level of ambition may not be sufficient to conserve the park into the future.

#### Option 4: Habitat improvement in the park coupled with progressively fencing willing land owners in the park's buffer zone

- It is not clear that the management option the plan opts for – the progressive fencing of Naretunoi and Sheep+Goats ranches coupled with active habitat management, aka option 4, will be enough to turn what has always been a migratory wildlife population into a sedentary one, albeit in a somewhat larger area. The original area of the ecosystem – much of which remains relatively intact further south, despite extensive fencing – is far larger than the area of Naretunoi and Sheep+Goats ranches mentioned in the Corridors report referred to above. Sheep+Goats Land is a key passage area to the core areas of Kaputiei Plains and Machakos ranches. Securing that passage area but fencing it off from the core areas further afield would only buy a little more time before the final collapse of the migratory wildlife populations in the ecosystem.

- Even if it was possible to maintain and adaptively manage a sedentarized wildlife population in a larger, fenced NNP, it would be critical to understand what the limiting factors are to the carrying capacities of different species. If it's low water availability in the dry season, then the management actions will need to include the provision of artificial water points, unless KWS is happy to keep populations at their lowest, which may be insufficient for a good visitor experience (10 animals per Ha is a good rule of thumb for a good visitor experience). Artificial waterpoints bring up issues of cost and availability, as well as the potential growth of wildlife populations beyond the estimated carrying capacity. If that situation is reached, how will KWS regulate population sizes? Culling? Unlikely. Expensive translocations? Maybe, until it's realized they're economically unsustainable. The end result could be massive wildlife die-offs, a lost park and lots of aggravation for KWS and all involved.

#### Tourism Development and Management Programme

- Regarding the tourism development and management plan, this section seems ambitious and comprehensive, and its implementation would hopefully bring much needed revenue. At the same time, the investments required to implement the tourism plan are substantial, and unless the effective management options are identified and implemented to address the declining wildlife population, those investments will be made in vain and will remain as white elephants. Which is a species the park currently lacks.
- Tourism development- given non-citizen numbers are stagnating but citizen numbers are growing, how is the infrastructure planning taking this into account to expand that segment? It is not clear.
- Overall the business model for the proposed tourism investments should also be made clear based on good market analysis.
- The NNP management plan has in its tourism development and management plan, proposal to put up a permanent high-end eco-lodge and develop the existing KWS Club House into a high-end restaurant. According to the [second schedule of the Environment and Management Coordination Act](#), amended in 2019 through legal notice 31 and 32, categorizes "the establishment or expansion of recreational areas in National Parks, National reserves, forests, nature reserves and any areas designated as environmentally sensitive" as high risk and calls for a comprehensive study by a registered expert to thoroughly analyse the environmental and social safeguards. Therefore, recommend that this is done, in accordance to the EIA procedures and best practices and adequate safeguards adopted to protect species, habitats and the park's integrity.

#### Community Partnership & Conservation Education Programme:

- In order to truly implement the ecosystem approach that the plan claims to espouse, Kenya needs to offer incentives to land owners in the dispersal areas, as well as in the core areas further south and east, to devote their land to wildlife. This can only be achieved if the expected rents from wildlife land use exceed the rents obtained from alternative land uses. A tall order of a park encrusted in a city, but options like game ranching and trophy hunting could do it. Ensuring secure land tenure – one of the

problems that has led to widespread land subdivisions in formerly pastoral lands – is also critical. This obviously goes beyond the NNP, and even beyond the remit of KWS, but that is precisely what a systemic approach entails.

#### Park Operations Management Programme

- Subdivision and land use planning outside the park and dispersal corridors is clearly a major threat. While the negotiation with individual landowners under option 4 is good there seems to be insufficient attention to engaging with local governance authorities to see what can be done to reverse trends, incentivize other options etc. focus on land use planning, tenure. Engagement at these strategic governance levels could yield more strategic long term solutions. Participation in planning meetings is mentioned in activity 1.5 under Park Operations but suggest this is insufficient. More targeted advocacy and engagement plan could be developed in partnership with stakeholders.
- Targeted inspections by NNP staff are insufficient to monitor potential negative impacts of disturbance/infrastructure. Selection of key ecological health indicators and consistent monitoring should be part of such impact assessment.
- It is unclear how responsibilities for the 5 priority programme areas tracks with proposed organizational structure in annex. Perhaps consider mapping that to ensure appropriate shared responsibilities and interlinkages across work programs.