

XD-ABN-164-A

**MID-TERM EVALUATION OF THE
CONSERVATION OF BIODIVERSE RESOURCE AREAS PROJECT
(COBRA)**

May 1996

Evaluation Team

Robert E. Hall, Institutional Specialist (Chief of Party)

Peter D. Little, Social Scientist

João S. de Queiroz, Natural Resources Specialist

TABLE OF CONTENTS

I. Executive Summary

II. Synthesis of Evaluation Findings and Recommendations

| | |
|--|----|
| 1. Introduction | 1 |
| 2. Progress Toward Project Purpose | 2 |
| 3. Institutional Capacity Building | 2 |
| 4. Integration within KWS | 5 |
| 5. Project Management | 6 |
| 6. Community Wildlife Program Implementation | 7 |
| 6.1 Focal Area Concept | 7 |
| 6.2 Linkage between Socioeconomic Benefits and Improved Conservation Practices | 8 |
| 6.3 Distribution of Benefits to Women | 9 |
| 6.4 Wildlife for Development Fund | 10 |
| 6.5 Enterprise Development | 11 |
| 6.6 Interest Aggregation and the Role of Wildlife Associations | 12 |
| 7. Building Partnerships | 13 |
| 8. Measuring Impact | 15 |
| 9. CWS Environmental Review Procedures | 15 |
| 10. Review of Draft Wildlife Policy of 1996 | 16 |
| 11. Contractor Performance | 18 |
| 12. USAID Performance | 19 |
| 13. Action Recommendations | 21 |

III. ANNEXES

Annex 1. Institutional Considerations

Annex 2. Social and Community Dimensions

Annex 3. Ecological and Natural Resources Aspects of Project Implementation

I. EXECUTIVE SUMMARY

The Conservation of Biodiverse Resource Areas Project (COBRA) was signed in April 1992 and began activities in Kenya in January 1993. Two years into implementation, the project has already undergone substantial evolution in its operation while remaining focused on its original objectives and purpose. Approximately one year of project implementation and institutional development within Kenya Wildlife Service (KWS) and the Community Wildlife Service (CWS) which serves as the organizational home of COBRA was lost due to political challenges to the KWS leadership and a prolonged investigation into KWS operations and decision-making. The larger organization emerged from these troubling times with a new chief executive officer who is widely respected in wildlife conservation and community wildlife management circles, as well as a new head of CWS and a new Chief of Party for COBRA.

The institutional framework of KWS is again under review and the mid-term evaluation took place in a context of major proposed structural changes. KWS is to undergo a regionalization and decentralization of its structure, staff and management systems. The new organization will have three strategic objectives, namely Biodiversity Conservation, Partnerships, and Tourism. These changes may lead to a better integration of the primary components of the Community Wildlife Program throughout KWS operations. The emphasis on accomplishing community conservation objectives through effective partnerships is consistent with COBRA principles and objectives. It is too early to determine with any certainty, however, whether the regionalization program as a whole will improve KWS's ability to fulfill its wildlife management and conservation objectives or simply prolong the already disconcerting period of institutional uncertainty and weakness of key organizational and financial management systems.

Significant progress has been made toward attaining the stated purpose of the COBRA project. Benefits have been generated for communities residing in major dispersal areas for wildlife and adjacent to National Parks and Reserves, primarily through revenue sharing and to a more limited extent from enterprise development. Perhaps more important, community attitudes toward KWS and toward the possibility of deriving meaningful economic and other benefits from community-based conservation have changed radically, especially in the focal areas of the COBRA project. Roughly Ksh 80 million, or USD 1.6 million has been disbursed to communities, local associations, and local governments as of December 1995. Almost 300 projects were approved and financed with revenue sharing funds provided by the Government of Kenya, KWS and USAID. While this constitutes a very substantial investment for communities who had heretofore only suffered the costs of living with wildlife, it is too early to tell whether the benefits provided to date will result in measurable changes in conservation behavior as a result of the observed positive changes in attitudes toward wildlife conservation and KWS.

The principal findings and recommendations from the mid-term evaluation are presented in the body of the synthesis report. A more detailed review of implementation experience, design considerations, institutional issues and natural resources concerns are found in the annexes.

A team consisting of an institutional specialist, social anthropologist, and natural resources specialist undertook the mid-term evaluation of the COBRA project during the period of January

22 to February 19, 1996. The team conducted detailed interviews with project and CWS staff, KWS senior managers, donor representatives, and USAID personnel. Field visits were conducted in each of the project's four geographic areas of intervention (focal areas): Samburu, Laikipia, Kajiado, and Coast.

**MID-TERM EVALUATION
CONSERVATION OF BIODIVERSE RESOURCE AREAS PROJECT (COBRA)**

II. Synthesis of Evaluation Findings and Recommendations

1. Introduction

With the signature in April 1992 of the COBRA Project Grant Agreement, the US Agency for International Development initiated an innovative effort to assist the Government of Kenya through the Kenya Wildlife Service to establish and institutionalize a national program in community-based wildlife conservation and management. The original agreement promised to provide up to USD 7 million in both direct grant assistance and through an institutional contract for technical services, training, policy development, procurement and institutional support. The project commenced with the arrival of the first Chief of Party (COP) in January 1993 and was to run for five years. One year into implementation, the parent institution and its Director were brought under close public scrutiny with the launching of an official "probe" by the Government of Kenya. A prolonged period of uncertainty and demoralization ensued, marked by the resignation of the first director of KWS and his replacement by another noted conservationist. The COBRA COP and his counterpart, the Assistant Director of the Community Wildlife Service (AD/CWS), also resigned during this time. The current AD/CWS and COP joined the project in December 1994 and January 1995, respectively. Roughly one year of project implementation and institutional development within CWS and KWS was lost. In recognition of this, a one-year no cost extension was granted; the current project activity completion date is December 31, 1997.

The institutional framework of KWS is again under review and the mid-term evaluation took place in a context of major proposed structural changes. KWS is to undergo a regionalization and decentralization of its structure, staff and management systems. The new organization will have three strategic objectives, namely Biodiversity Conservation, Partnerships, and Tourism. Since the reorganization plan has yet to be elaborated, the evaluation mission did not attempt to make recommendations that were dependent on the outcome of the reorganization but instead focused on measures that would improve the community conservation program and provide direction for the next two years of implementation.

Despite the organizational problems faced by KWS, significant progress has been made toward attaining the stated purpose of the COBRA project. Benefits have been generated for communities residing in major dispersal areas for wildlife and adjacent to National Parks and Reserves, primarily through revenue sharing and to a more limited extent from enterprise development. Perhaps more important, community attitudes toward KWS as the steward of the nation's wildlife resources and toward the possibility of deriving meaningful economic and other benefits from community-based conservation and management have changed radically, especially in the focal areas of the COBRA project. Roughly Ksh 80 million, or USD 1.6 million has been disbursed to communities, local associations, and local governments as of December 1995. Almost 300 projects were approved and financed with

revenue sharing funds provided by the Government of Kenya, KWS and USAID. While this constitutes a very substantial investment for communities who had heretofore only suffered the costs of living with wildlife, it is too early to tell whether the benefits provided to date will result in measurable changes in conservation behavior as a result of the observed positive changes in attitudes toward wildlife conservation and KWS.

2. Progress Toward Project Purpose

The intentions of the COBRA project are clearly specified in the Project Paper.

- * The goal of the COBRA project is to promote socio-economic development through conservation and sustainable management of Kenya's natural resources.
- * The purpose of the project is to increase the socio-economic benefits to communities living adjacent to Kenya's parks and reserves from conservation and sustainable management of wildlife and natural resources.

Significant progress has been made toward attaining the stated purpose of the COBRA project. Benefits have been generated for communities residing in major dispersal areas for wildlife and adjacent to National Parks and Reserves, primarily through revenue sharing and to a more limited extent from enterprise development. Perhaps more important, community attitudes toward KWS as the steward of the nation's wildlife resources and toward the possibility of deriving meaningful economic and other benefits from community-based conservation and management have changed radically, especially in the focal areas of the COBRA project. Roughly Ksh 80 million, or USD 1.6 million has been disbursed to communities, local associations, and local governments as of December 1995. Almost 300 projects were approved and financed with revenue sharing funds provided by the Government of Kenya, KWS and USAID. While this constitutes a very substantial investment for communities who had heretofore only suffered the costs of living with wildlife, it is too early to tell whether the benefits provided to date will result in measurable changes in conservation behavior as a result of the observed positive changes in attitudes toward wildlife conservation and KWS.

3. Institutional Capacity Building

The Community Wildlife Service has been successful in reorienting the behavior and attitudes of many of the career wildlife officers inherited when the former Wildlife Conservation and Management Department was converted into the parastatal organization Kenya Wildlife Service. This was accomplished by an intensive program of in-service training, workshops and study tours largely financed and supported by the COBRA project. While some senior wardens and Headquarters staff do not appear to be adequately informed of the types of activities promoted through the Community Wildlife Program (CWP) and the approach used

in working with communities, the objective of promoting the acceptance of community conservation within KWS has been largely accomplished. The task remaining is to insure that the training experiences and curriculum are institutionalized within KWS.

- Satisfactory completion of the modular course in Community Wildlife Management, or an equivalent, should be mandatory for all operational personnel at the level of Warden and above, and should be a factor in promotion for those officers already in service.
- An assessment of the capacity of the Naivasha Wildlife and Forestry Training Institute to offer this course should be made and measures taken to insure that the course, or an equivalent, is offered on an annual basis at an institution in Kenya.

Another important aspect of capacity building supported by the project was the recruitment and hiring of key staff for the CWS. The Project Agreement called for the hiring of five staff positions to be paid by USAID on a declining basis with full salary assumption by KWS at the end of the project. It became clear during the first year of implementation that additional core staff would be required, especially to implement the CWP in the four focal areas chosen for the project. Overall, the personnel recruited to staff CWS and those provided through the institutional contract have been capable and dedicated to the task of building a community conservation program within KWS. The Field Program Coordinators (FPC) in particular have been effective agents for KWS in changing community attitudes, building confidence, developing community capacity in management and decision-making, and in assisting communities to define their priorities and then develop proposals for support through revenue sharing and the Wildlife for Development Fund (WDF). It is important to note that the FPCs are all from the uniformed service and held senior positions prior to joining "Community". They are among the most potent advocates of the new orientation within KWS as well as positive examples of the effective conversion of attitudes.

The Community Wildlife Service consists of six technical units: Wildlife Utilization, Problem Animal Management (PAMU), Monitoring and Evaluation, Training, Community Mobilization, and Enterprise Development. PAMU is made up of a Problem Animal Control (PAC) and a Fencing section. The Wildlife Utilization unit and PAMU have the closest ties with the other departments and branches of KWS. The PAC section in particular works closely with wardens and rangers on the ground. The Fencing section head is often called upon for technical guidance related to fencing projects undertaken by other branches of KWS. Indeed, there exists an unproductive level of ambiguity regarding who is responsible for fencing activities and the process for review and implementation of fencing projects. While all proposals for establishing wildlife barriers should be reviewed and approved by CWS, the physical construction of fences would best be left with the technical services branch of KWS. Guidelines for community involvement in siting, design of the barrier (especially points of entry), and in providing labor for construction should be established by CWS and monitored by CWOs in the field.

Similarly, consideration should be given to the need for a Problem Animal Control capability at the central level. With the regionalization of KWS, PAC capacity should also be decentralized. Technical guidance in wildlife management applicable to PAC should be the

responsibility of the Research and Planning Department (Biodiversity Conservation Department in the proposed structure) since research activities under the new structure are to focus more concretely on the wildlife management needs of the Service.

Now that CWS has accomplished some of its objectives, especially in terms of reorienting attitudes, developing an approach to working with communities, and establishing a curriculum for training in community wildlife management, it is an appropriate time to reassess staffing needs and the future role of CWS in implementing specific aspects of the community wildlife program. Some positions, such as the FPCs are essential to the Community Wildlife Program and to KWS and should be retained. There will continue to be a clear need for community conservation specialists in the new regional offices and the transition from Field Program Coordinator to Regional Partnership Coordinator is a logical one. Others, such as the Fencing Specialist, PAC head, PAMU head, and Training Coordinator will need to be reviewed both on performance criteria and in regard to the appropriate organizational lodging for the functions performed.

By streamlining the structure and focusing on the core functions over the next two years of project implementation, CWS will be in a much better position to emerge as a strong and viable program as donor funding is withdrawn. The rather alarming shortfall of budget revenues compared to expenses makes it highly unlikely that KWS will be able to maintain the higher salary levels currently enjoyed by key CWS and KWS staff on technical assistance contracts.

Three staffing issues need to be addressed in the near term. First, there is a clear need for a senior staff position within CWS to coordinate field operations and insure that the objectives of the KWS program in community conservation are understood and implemented effectively. The AD/CWS currently lacks a deputy who can be charged with the day-to-day oversight of the program. At the present time, field activities of the FPCs are supported by a very capable and experienced individual provided under the institutional contract. Since this position is not a line position, his role is more advisory than hierarchical, thereby weakening the effective supervision that he is able to provide to field activities. It would be to the advantage of CWS to offer a line position reporting directly to the AD/CWS to this person at the end of his contract.

Second, given the status of training and community mobilization accomplishments to date, serious consideration should be given to eliminating both posts or at least combining these positions into one line. Specifically, there is no longer a justification for a separate training coordinator position in CWS. This position was of great value during the early years of CWS as efforts focused on changing the organizational culture within KWS. With the development of a community conservation module for staff training and the strengthening of training capacity in the Human Resources Department, the need for a separate staff position for training within CWS no longer exists.

Finally, a line position responsible for enterprise development should be established within CWS. At the present time, the function is provided through the institutional contract with no designated counterpart within CWS. Expertise in enterprise development is essential to the

further development of income-generating activities within the community conservation framework, even if the responsibility for implementation of these activities is increasingly shared with organizational partners.

- A staffing plan should be developed that reflects the current and anticipated needs of the CWP. Attention should be given to reducing essential staff numbers while taking necessary measures to insure that key functions e.g. the Field Operations Coordinator and Enterprise Development Specialist are assigned to line rather than technical assistance positions.
- The continuation of technical assistance contracts for key CWS personnel should be reviewed as part of the KWS plan for long-term institutional development and financial sustainability.

4. Integration within KWS

While the concept of community conservation has been widely though not universally accepted, the effective integration of CWS into the parent organization is incomplete. Three factors have contributed to this. First, CWS is a division within the Department of Wildlife Services which also has responsibility for the management of National Parks and Reserves. As the head of a subordinate division, the AD/CWS does not participate in Executive Committee sessions. This has resulted in lessened visibility for community wildlife program priorities and concerns and has also hindered the transmission of clear policy and operational guidance to CWS. Second, CWS has been headed since its creation by a civilian while the KWS agents responsible for implementation are uniformed staff. While the problem appears to be lessening with time and familiarity, some uniformed officers have preferred to circumvent CWS and instead report directly to the Deputy Director of Wildlife Management. Tolerance for such behavior by superiors further undermines the authority of the program and senior CWS staff.

Finally, the objectives and accomplishments of the Community Wildlife Program, CWS, and the COBRA project have not been effectively promoted by senior management within KWS or with external publics. The failure to promote effectively the central role of CWS is demonstrated by the lack of references to the program or service in news releases carried by the national press and in articles in the KWS in-house newsletter. It should also be noted that the role of USAID in supporting KWS and in financing COBRA has been given little visibility compared to other donors, including some whose monetary and technical contributions are less substantial.

At a broader level, the active promotion of KWS senior managers and their programs should be encouraged. Past experience has demonstrated the negative effects of over-identification of an institution with its chief executive. While it is not always possible to convince the news

services to broaden their focus, the KWS public relations office should make a point of producing news releases and other publicity materials that recognize the important contributions of other employees to the successful operation of Kenya's valuable protected areas.

- As KWS prepares for the proposed reorganization, it would be advisable to include the AD/CWS in senior staff meetings.
- Promotion of Community Wildlife Program as the expression of KWS policies and priorities in community conservation should be emphasized in press releases and the KWS Newsletter. Other senior managers and their programs should also be highlighted in public relations so as to broaden the public perception of leadership within KWS.

5. Project Management

The establishment of a new service that combines both headquarters and field operations is bound to face imbalances between establishing sound management procedures and getting the job done in the field. Overall, the CWS has managed to avoid falling into either extreme. Nevertheless, there are clear deficiencies in some key areas. First, there are not adequate mechanisms in place to insure that the organization will learn from implementation experiences in the focal areas and that the lessons will be communicated effectively throughout the organization.

Second, there has been a failure to establish an ethic of cost consciousness in activities sponsored by CWS, whether they are paid out of the grant, from KWS operating funds, or from the WDF. This has been the most obvious in the case of study tours and training sessions, and in the inclusion of inflated salary levels for community members in enterprise project proposals. An insensitivity to cost communicates the wrong message to community members, local technical service personnel, and potential partners in addition to representing a lack of resource efficiency.

A third management shortcoming involves the inadequate integration and utilization of the Monitoring and Evaluation Unit and its products. The establishment of a learning organization depends on effective information collection, analysis, and communication. Senior management must become more comfortable and knowledgeable in the use of M&E data for management decisions, planning, program development, and the traditional function of output and impact determination.

- Operational guidelines and procedures for funded activities should be reviewed and harmonized as soon as possible. Cost standards and expense guidelines for common activities and investments e.g. workshops, training, tours, and construction projects should be developed and utilized by both field and headquarters staff.
- A staff meeting is needed to discuss data requirements and availability, collection

procedures, and the value of M&E for planning, program development, project design and implementation, and impact determination.

The evaluation mission also noted in some cases a lack of cohesiveness, integration, and effective collaboration among CWS staff and including personnel provided under the institutional contract. FPCs and senior CWS staff acknowledged difficulties in working relations with the Training Coordinator in particular. Similar difficulties had been noted on an earlier supervision visit, suggesting that the problem is of long standing and not fully explained by personality differences with new personnel. Adoption of the recommendation to eliminate the Training Coordinator position due to the lack of continued need for the function would resolve some of the more obvious collaboration problems.

CWS management has taken measures to improve communication. Staff meetings attended by the FPCs are held on roughly a monthly basis in Nairobi. The current AD/CWS has also actively sought opportunities to visit field activity sites and has been commended on her ability to work with organizations, communities and KWS staff at the local level.

CWS staff on technical assistance contracts reimbursed by USAID under COBRA have voiced concern about differences in personal emolument and claim that their salary levels and benefits are not on a par with technical assistance contract employees paid by other donors. There have also been substantial periods of time when contract employees were obliged to operate without a valid contract due to delays in processing contract renewals. While the accuracy of the claim regarding compensation differences for TA contract employees from one donor to another is difficult to assess in part because of the lack of similarity in training, experience and market demand for services across the rather broad range of TA contract employees, it is evident that the use of TA contracts to attract skilled personnel in key areas considered essential to the performance of KWS has engendered significant problems throughout the organization. Since the long-term sustainability of maintaining staff at these higher salary levels is doubtful, a planned transition to a consistent salary schedule for all KWS staff is highly desirable.

6. Community Wildlife Program Implementation

CWS relies heavily on district-based personnel to implement the Community Wildlife Program, yet until the latter part of 1994 the FPCs were based in Nairobi. With their relocation to field postings, the community program took off. At this point, however, the FPCs and their programs would benefit from better coordination among themselves and with headquarters. In some respects, CWS seems to have lost sight of the need for a larger framework for planning and prioritizing activities. While the strong field presence is commendable, it is now time to place the community program into an overall strategy which will allow field staff to assess what their funding priorities should be, where within the districts they should concentrate, and what types of information are needed to assess the viability of WDF/RS proposals.

- It is recommended that CWS produce a short planning document that carefully lays out program priorities, how field activities are to address priorities, and how the two-fold goal of improving local benefits and biodiversity conservation will be achieved under this strategy.

6.1 Focal Area Concept

The decision to concentrate COBRA project activities in four geographic areas has permitted the project and CWS to have a meaningful impact with limited resources. The major stakeholders in community conservation in the focal areas are now fully aware of the KWS approach to community involvement and are beginning to see real benefits from both revenue sharing and increasingly from enterprise development activities. The recent decision to enlarge the focal areas takes into consideration the discrepancy between important ecologically defined areas and districts. The “focal area and its neighbors” concept is a logical way of expanding the program by targeting key biodiversity resources and ecosystems considerations e.g. wildlife migration routes. Nevertheless, it is important that the expansion into new areas results in more than simply the extension of project and CWP benefits to a broader population. There must be a clear basis for working in specific areas of the focal neighbors that is directly tied to wildlife conservation and management.

The district focus approach suffers from two limitations: (1) districts seldom encompass entire ecosystems, and conversely (2) not all areas within a district are of equal biodiversity importance. These limitations suggest that COBRA should focus its planning activities on an ecosystem level. Implementation of community projects would still be undertaken at the district level, thereby insuring conformity with the Government’s District Focus for Development policy. Such an effort is underway in Samburu focal area. However, the lack of clear biological and social criteria to prioritize interventions and the large area encompassed by migration-delimited ecosystems threaten the effectiveness of this initiative. The KWS research program provides little data of use in establishing these ecosystem priorities and guiding wildlife management planning.

- A review of existing ecological studies should be initiated to insure that existing ecological knowledge is used in targeting CWS’s field activities at the ecosystem level.
- CWS should collaborate with the Research and Planning Department to identify applied research needs to support ecosystems based planning and other areas of priority to the community program.

6.2 Linkage between Socioeconomic Benefits and Improved Conservation Practices

The Community Wildlife Program has undergone a clear evolution in emphasis if not in objectives since implementation began in 1990/91 (prior to COBRA.) As a means of gaining

popular support and making a clear (and quick) impact on communities adjacent to the major National Parks and Reserves, revenue sharing funds were disbursed with few formal requirements or restrictions. One of the more popular and easy to manage objects for revenue sharing was the payment of bursaries (tuition and lodging costs) for secondary students. School construction was also a local priority. Of the almost 300 activities approved for funding as of December 1995, 57 were for school construction while 41 were for bursaries. Since 1993, more emphasis has been placed on capacity building, productive community investments, and in the past year in particular on the development of income generating activities tied to wildlife conservation and management. While social investments such as schools, bursaries, clinics, and social infrastructure represent genuine community priorities, they are not overtly tied to conservation practices. Furthermore, in some cases they appear to be creating a sense of entitlement based simply on living in proximity to protected areas rather than being tied to positive measures taken by the community to improve wildlife conservation and management. This is especially, and almost uniquely, the situation in the six Group Ranches surrounding Amboseli and Tsavo East National Parks.

- Establish a transition plan and time frame for linking WDF/RS directly to desired conservation behavior and objectives.
- Additional assistance will need to be provided to communities to build the capacity to develop realistic wildlife management and community action plans that include alternative income sources and rational, budgeted application of WDF/RS funds during the transition period. External assistance from specialist organizations and local NGOs should be sought.
- While social investments will remain a priority in many areas, approval for funding should be made contingent on specific criteria or actions. Bursaries, for example, could be used to encourage the education of girls and to assist those most in need. School construction could be tied to actions limiting the expansion of irrigated cultivation.

6.3 Distribution of Benefits to Women

The COBRA Project Paper stated that 35 percent of WDF funds should directly benefit women's incomes and employment. While there have been some targeted investments for women's groups--especially the cultural *bomas* and curio shops--the majority of activities have been skewed toward the financing of male-dominated activities. An examination of funded activities in the four focal areas during 1995 shows that less than 15 percent of funds were disbursed for projects that directly benefit women's incomes and employment. In some cases, the largest activities excluded strong participation by women. In the case of bursary disbursements in Kajiado District (totaling more than Ksh 5 million in 1995), for example, it is estimated that only about 20 percent of funds were allocated to females (based on interviews with two group ranch chairmen). The disbursement of about Ksh 5 million to fishermen and boat operator groups in Shimoni was solely for use by men. This represented

more than 75 percent of WDF/RS funds allocated to Kwale District during 1995. In speaking with FPCs and other CWS staff members there seemed to be little knowledge that a certain percentage of RS/WDF funds were to be directed toward women; nor was there much stated concern that women were not included in many of the WDF activities.

- It is recommended that the M&E unit review all WDF/RS proposals to assess the percentage of stated beneficiaries that are women. All CWS staff should be sensitized to the importance of developing projects that distribute benefits to women and the economically disadvantaged segments of the community.
- If deemed necessary after initial meetings, a WID consultant should be engaged to assess how gender considerations could best be incorporated in the design of WDF/RS activities.

6.4 Wildlife for Development Fund

The WDF has been long in preparation and effectively utilized only since late 1994. Detailed guidelines went through several versions before approval by the KWS Board of Directors in 1994. Since then additional changes were required and a newly revised version was ready for Board review in February 1996. Though detailed, they appear to be accessible to communities and NGOs wishing to submit proposals since the expectation is that assistance will be provided by a CWO, District Warden, or FPC. While the weighting system for judging the priority areas of investment may be criticized, it provides a clear link to both the biodiversity importance of the area and its value to wildlife conservation. More important, the guidelines require transparency in the awarding of funds and provide a foil against attempts to gain access to WDF resources by politically powerful or well-placed individuals. The guidelines do not and should not allow for any discretionary usage of funds. This is a critical provision if donors, the Government of Kenya and recipient communities are to have any confidence in the wise and objective usage of public resources.

While the evaluation mission was generally satisfied with the structure of WDF, there was concern regarding the lack of effective and clear guidance on (a) the type of activities that were acceptable, (b) the kinds of budget items allowable, and (c) the scale of projects that could be covered under WDF. The result has been the development of proposals for comparable activities but at very different costs. Wide discrepancies in costs were noted for wells, schools, and enterprise projects such as cultural centers. The lack of clarity - or consistent application of existing guidance - has also led to the inclusion of salaries for local employees in some districts but not in others. As a general rule, the evaluation mission finds that the payment of salaries from WDF/RS is inadvisable. It creates a high demand for continued cash disbursements which is inconsistent with the objective of the fund and also threatens the sustainability of many activities that have only modest revenue generating capacity.

Guidance on these and other areas of use in developing WDF proposals should be issued

separately from the "Guidelines" so as to limit undue complexity in what should be a concise statement of the criteria and procedures for project identification, development, review and approval. Detailed guidance and models could be presented in a brief field manual that could be updated as needed.

Clear guidance must be developed that lays out the types of acceptable investments, allowable expenses, standard costs or cost thresholds, and the financial ceiling for WDF/RS proposals. Such guidance is needed for FPCs and CWOs as well as for communities. It will also be essential for partner institutions involved in the development and implementation of community conservation programs.

6.5 Enterprise Development

The development of income-generating activities for local landholders and communities is a core objective of the COBRA Project and of KWS. During calendar year 1995, over Ksh 32 million was approved for enterprise development project financing through the WDF/RS. The total approved in preceding periods amounted to only Ksh 4 million. At the present time, enterprise project proposals have been approved in each of the focal areas and more have been proposed and are under development in communities across the country. This experience must be carefully assessed and the lessons applied by KWS and its partners in future enterprise activities across the country. While the progress made to date must be commended, the mission cautions against a too rapid expansion into an area that is unfamiliar to the communities concerned and that may involve a high level of risk. Each of the project proposals over Ksh 1 million approved for funding was accompanied by market analysis and a business plan, however in a number of cases the assumptions for potential revenue appeared unrealistic. Most showed rates of return within the first year of 25 percent or more, a highly unlikely outcome given the importance of marketing and the unpredictable nature of the tourism industry.

Both social and enterprise investments require careful planning. A specific concern with enterprise investments is the danger of an unsustainable replication of similar, and competing, enterprises. The multiplication of cultural *bomas* in the area around Amboseli appears to be reaching the point of market saturation. Enterprise projects must also be sensitive to the affect on the ecology of the area and the threat that tourism impact may have on fragile areas.

While KWS should continue to promote enterprise development, it should also actively seek partners for technical assistance and implementation. Capable and accountable partners will not be available in every region and CWS must retain and refine its capacity to assist communities in developing viable income-generating projects. The experience to date in Samburu and Laikipia of working with specialist organizations to provide marketing and business management training appears to have been successful and should be expanded. There has also been increased interest from the private sector in undertaking joint ventures

with community organizations to develop campsites, lodges, and other tourism related enterprises. This trend should obviously be encouraged, but also underscores the need to assist communities in obtaining equitable contractual agreements with relatively stronger business partners.

- The commercial viability and sustainability of enterprise proposals must be more carefully screened. A set of standard cost criteria and allowable expenses should be developed to guide FPCs and partners in developing proposals.
- Area planning for enterprise investments, especially those based on tourism, is essential to insure commercial and ecological viability. The development of area planning should be undertaken in consultation with the Research and Planning and Commercial Departments.
- As in other areas of activity, KWS must forge closer ties with public agencies, nongovernmental organizations, and private sector partners to support the enterprise development component of the CWP. Specifically, efforts should be made to develop partnerships in areas such as marketing, cultural awareness for business effectiveness, and business management.
- Direct investment of WDF funds in financing enterprise projects may be acceptable as seed money but should be replaced by private investment and commercial loans as communities and potential partners gain confidence and experience.
- CWS should draft guidelines for community and private sector collaboration to promote a level playing field and an equitable sharing of risks and benefits.

6.6 Interest Aggregation and the Role of Wildlife Associations

CWS/COBRA has been very effective in promoting the creation of Group Ranch associations, wildlife fora and conservancies. These groups serve to aggregate the interests of smaller communities, individual landholders, and Group Ranches into more ecologically significant and politically effective units. The conservancies established in Samburu, for example, include up to 30 Group Ranches covering two administrative divisions and linking large conservation areas of importance to migratory routes for elephant. The recently created Amboseli-Tsavo Wildlife Association covers the eight principal Group Ranches around Amboseli and Tsavo West National Parks. Other associations have been formed by fishermen and boat operators in the Coast region.

These associations may be used to increase the effective area of planning for wildlife and biodiversity conservation and management, and in some cases may serve as a deterrent to sub-division and fencing. The creation of community-managed game sanctuaries, such as Mwaluganje-Golini Community Conservation Ltd., has contributed significantly to the conservation of biodiversity in Kenya. Wildlife associations also provide a conduit for

communication of wildlife conservation and management information, concerns and strategies to larger groups of landholders and other interested parties. Greater lobbying power afforded by the establishment of these interest blocks will diminish the chances that key wildlife resources are usurped by outsiders.

The effectiveness of this strategy is yet to manifest itself. Some of the associations are composed of member-groups that are themselves only nominally organized. There is a clear lack of management and decision-making capacity at the core of many of the new associations which will need to be addressed by CWS and its partners if the larger association is to be representative and authoritative when speaking for members' concerns. Furthermore, attention should remain on ecosystem based wildlife management groups rather than on the creation of a hierarchy of wildlife associations. Experiences in Kenya and elsewhere demonstrate that the creation of a hierarchical structure of "popular" associations tends to undercut the organizational basis and independence of the base associations. In this highly charged political environment as Kenya moves toward national elections in 1997, the risk of political co-optation or division exceeds any gain for wildlife conservation that may result from the premature creation of an unrepresentative and unsolicited "national" association.

- CWS should continue to support the formation of wildlife and biodiversity-based associations, emphasizing the need to base such associations on the expressed self-interest of members.
- Capacity-building within the constituent groups will remain a pressing priority for assistance efforts. Conservation and rural development NGOs may be effective partners.
- The establishment of a National Wildlife Association should await the expression of an authentic demand from local and district-based associations. The establishment by KWS of a hierarchical structure will risk alienating the associations who must remain the focus of wildlife conservation and management efforts, while leading to the politicization of conservation issues at a time when partisan tendencies are discerned in virtually every public gathering.

7. Building Partnerships

The involvement of community-based organizations, local NGOs, research and training institutions, individual subject matter specialists, landholders, and private sector actors in both community wildlife conservation and management and in the implementation of the CWP has been an objective stated in early planning documents for KWS and in the COBRA Project Paper and Grant Agreement. While some experience has been gained in this area, a more concerted effort to develop partnerships is required. CWS has worked with research and training institutes, local NGOs, and sectoral agencies such as SDDP in Samburu, and additional partnership arrangements are planned. Increasing attention has been given to

intersectoral collaboration at the local level as well. CWS support for organized groups of landholders such as the Laikipia District Wildlife Forum and the conservancies in Samburu is also increasing.

The fostering of effective partnerships has been identified as a strategic goal and organizing principle for the reorganization of KWS. Effective partnerships will be essential for the conservation of habitat and biodiversity in areas outside of parks and reserves. They will also allow KWS and the community program to reduce the level of manpower and other resources required for implementation, especially as demand for assistance increases.

While the ultimate objective in regard to partnerships should be to transfer implementation responsibility to external actors while retaining regulatory and technical support functions, CWS will be required to maintain an active field presence and direct support to community conservation, enterprise development, and related activities in the near-term. NGO capacity at the national and grassroots level is very weak. Furthermore, many localities of special concern to wildlife conservation are outside the normal program areas of Kenya's NGOs. In areas where NGO capacity and presence appear to be promising, every effort should be made by CWS to pursue partnership arrangements. This will require an assessment of NGO capacity, assistance requirements, reputation, and acceptability by the concerned communities. The establishment of partnerships will not signal the end of responsibility for community conservation by CWS. While CWS reduces its role in direct implementation, it will need to increase its capability to inform and educate partners while enforcing respect of the Community Wildlife Program policies and principles and monitoring NGO performance.

The path to effective partnerships will not be without its rough spots. It is highly unlikely that partnerships with NGOs, externally financed development programs, and local government technical agencies will result in a reduction of the global costs of community conservation. The experience in other countries clearly demonstrates that total costs will likely increase. This will undoubtedly lead to further demand on donor resources to fund community conservation activities. Today, community conservation is a popular topic among donors. Tomorrow, they may decide that it is no longer a priority, especially as tourism revenues and hence the economic value of wildlife is distributed more thinly among a growing number of wildlife tourism destinations.

The multiplication of implementing partners may lead to fragmentation in the Community Wildlife Program. To avert this danger, KWS must insure a basic level of uniformity in the ground rules for participating in community conservation, enterprise development, and wildlife management. The entry of NGOs and other donor funded programs in the field of community conservation may also threaten the identification of benefits with KWS and its program. Special care must be taken to insure that development NGOs, government agencies, and externally funded rural development programs that are accepted as "partners" in implementing aspects of the CWP do not subordinate conservation priorities such as preservation of habitat to their other development priorities such as increased herd size and agricultural production.

The promotion of partnerships must be done in a planned manner. In cases where a contract is initiated, safeguards for insuring objectivity in the selection of NGOs and private firms, for monitoring progress and outputs, and for evaluating performance must be in place. If KWS is not providing funds to a partner organization, they must still take measures to insure that the philosophy and guidelines of the KWS Community Wildlife Program are applied.

- CWS should actively plan for the transition from an implementing to a (largely) public education, regulatory, and technical support role in promoting community conservation.
- Partnerships in wildlife conservation and management and in implementing the Community Wildlife Program must be pursued more vigorously. Preference should be given to community-based organizations when possible, and to local NGOs selected by the communities concerned.
- Procedures for the identification, monitoring and performance evaluation of partners must be put in place prior to the launching of a major partnership initiative. Partners should be held to the same standards of accountability, performance and transparency expected of community organizations and contracted service providers. Pilot contracts for specific services may then be initiated, with lessons collected and applied to future partnership arrangements.

8. Measuring Impact

After five years of existence as a donor-financed experiment in parastatal management of the nation's wildlife establishment, Kenya Wildlife Service still lacks even a rudimentary institution-wide monitoring system. Monitoring within the Community Wildlife Service got off to a slow start as well. However, substantial progress has been made since 1994 when a monitoring and evaluation specialist and data management specialist joined the staff. There are now four databases maintained by the CWS M&E Unit and routine monitoring reports are being produced for each of the focal areas and for the CWP as a whole.

While progress has been made in monitoring program activities and outputs, current monitoring efforts are insufficient to detect impacts of project activities on the resource base, or changes in the perception or behavior of community members toward wildlife. Given the lack of baseline data and the difficulty of collecting and interpreting data on biophysical indicators, the M&E Unit must make full use of existing resources within KWS and in other Kenyan institutions such as the Dept. of Resource Survey and Remote Sensing.

- Efforts must be taken to insure that information flows systematically and routinely from CWS's activities in the field and other relevant departments and programs to the M&E Unit.
- To provide the basis for impact monitoring the following actions should be taken:

- a) follow-up KAP surveys in Kajiado District;
 - b) initiate pilot analysis of change in biophysical indicators in selected areas of Kajiado focal area;
 - c) apply to other priority areas as warranted.
- An assessment should be made of the best location of M&E functions within KWS and the relationship of the CWS M&E Unit to organization-wide monitoring.

9. CWS Environmental Review Procedures

KWS has limited capability to undertake Environmental Impact Assessments (EIA). There are no institutionalized procedures to determine whether an EIA should be conducted. One MSc level environmental specialist has been assigned to assist CWS with environmental reviews. However, he has neither adequate equipment nor transport to conduct the reviews. This seriously reduces his ability to perform EIAs and consequently there is a backlog of WDF approved activities awaiting review.

USAID's Regulation 216 provides detailed guidelines to determine the level of environmental review different category of activities require. The CWS Environmental Officer, and the KWS EIA unit in Research and Planning, could use these regulations to screen activities that need full-fledged EIAs from those that may require little or no environmental review. The role of the CWS Environmental Officer should be limited to the screening of activities and to conducting Initial Environmental Evaluations (IEE) and simple assessments that do not require external assistance. More technically complex EIAs should be conducted by external agencies and technical specialists with oversight and guidance only from the KWS EA unit.

- It is recommended that the Environmental Officer be introduced to USAID's Environmental Procedures as outlined in the Agency's Regulation 216, and that this be used to determine the level of review required for WDF-funded activities.
- WDF guidelines call for all activities over Ksh 100,000 to be subjected to EIAs. This is unnecessary and will compromise the effectiveness of COBRA Project implementation. This requirement should be dropped for activities under Ksh 100,000.
- The Mission supports the strategy proposed by KWS of contracting out for major environmental assessment services, with guidance from the EA unit.

10. Review of Draft Wildlife Policy of 1996

The draft Wildlife Policy of 1996 is based on a review of the 1975 "Statement on the Future of Wildlife Management Policy in Kenya", the results of the December 1994 study

commissioned by the Board of Trustees entitled "Wildlife-Human Conflicts in Kenya", and sectoral studies on wildlife utilization, land use policies, tourism, and legal issues. The draft policy proposes the restructuring of KWS on a regional basis following ecological zones, the decentralization of wildlife use rights, the promotion of consumptive and non-consumptive utilization as the primary means of insuring that benefits from conservation flow to those who suffer the depredations of wildlife, and the linking of use rights with responsibilities. KWS as an organization would move away from what the authors call a "protectionist" approach toward a regulatory function, placing management of biodiversity including wildlife outside of the protected areas in the hands of "partners" while retaining responsibility for the direct management of protected areas and the supervision, monitoring and enforcement of biodiversity conservation laws and regulations as needed.

The draft policy is a wide-ranging review with equally wide-ranging recommendations. A core aspect of the proposed policy is the broadening of KWS's mandate from wildlife to biodiversity conservation in a more holistic sense. Another key aspect of the draft policy is the restructuring of the organization along ecosystem rather than administrative boundaries. Both of these changes require a level of scientific understanding and analysis that are posited or assumed to exist but are not demonstrated or proven to be accessible to KWS at this time.

The general provisions on community conservation of the proposed policy are consistent with the principles laid out in the Zebra Book and by CWS and the COBRA project regarding the importance of enabling communities and individual landholders to participate directly in the benefits of wildlife conservation and management. Furthermore, the draft policy is consistent with the emphasis on developing partnerships with key stakeholders: landowners, traditional authorities, communities, NGOs and public agencies, among others. The current emphasis by CWS on promoting and assisting with the creation of wildlife associations and similar groups is recognized and supported in the draft policy as well. In short, the principles and recommendations proposed in the draft policy are generally consistent with the goals, objectives and current program initiatives of CWS and the COBRA project.

The draft policy goes farther, however, by calling for lifting of the hunting ban and other legal provisions that restrict the range of uses that landowners and other "competent authorities" may make of biodiversity resources in areas outside the Parks estate. Instead, the policy proposes that the State, through KWS, retain ownership of biodiversity resources (specifically wildlife) while granting use rights linked to responsibilities to competent authorities at the local level. These competent authorities would be required to draw up management plans that would be approved and their implementation then monitored by KWS. The evaluation mission did not issue a position on the lifting of the hunting ban, other than to note that at the present time and with the present human and logistic resources, it is highly unlikely that KWS would be able effectively to monitor and enforce hunting quotas and prescribed wildlife management practices outside of protected areas.

The restructuring of KWS along regional lines would not necessarily prejudice the implementation of the principles and programs of CWS or the COBRA project. As mentioned in a preceding section, the COBRA project has already adopted an approach that

is consistent with ecological rather than strictly administrative jurisdictions in implementation. However, the program priorities and operational capacity of the proposed Partnership Department are largely unknown. By moving toward a regional program, the concentration of COBRA resources on the four focal areas may prove difficult to maintain. While the current system of Field Program Coordinators supported by CWOs should survive the transition to a regional program, the CWS itself will likely disappear with most of its functions transferred to the Partnership Department. Responsibility for uniformed personnel outside of protected areas would no longer fall under CWS or the Partnership Department but instead would revert to the operations structure of KWS.

These changes may lead to a better integration of the primary components of the Community Wildlife Program throughout KWS operations. The emphasis on accomplishing community conservation objectives through effective partnerships is consistent with COBRA principles and objectives. It is too early to determine with any certainty, however, whether the regionalization program as a whole will improve KWS's ability to fulfill its wildlife management and conservation objectives or simply prolong the already disconcerting period of institutional uncertainty and weakness of key organizational and financial management systems.

11. Contractor Performance

Each member institution of the DAI/AWF/MSI consortium has contributed to the implementation of the COBRA project. Overall, the level of technical assistance has been adequate to excellent and the consortium members have managed to provide technical inputs in a timely and capable fashion with a few exceptions.

The performance of DAI as the lead institution in the consortium has generally been good. The political and organizational crisis that afflicted KWS in 1994 seriously affected the performance of all units within the organization, including CWS and the COBRA Project. The change in personnel at both the level of the AD/CWS and the COBRA COP also presented significant discontinuity in the implementation of the program. Nevertheless, DAI senior management closely monitored implementation progress and took measures to alleviate problems when needed.

Due to chronic delays by the KWS finance office in processing reimbursement claims for USAID funding, the institutional contractor agreed to facilitate reimbursement (and thereby improve cash flow for KWS) by passing and accounting for funds through the institutional contract. While delays continue to occur, this arrangement has proved satisfactory to date. Financial management problems continue to plague KWS, making this rather innovative mechanism for channeling funds in support of project actions of continued relevance. While the mission did not make a detailed assessment of reporting by the institutional contractor, the quarterly and annual reports reviewed by mission members provided useful information, concrete action plans, and reasonably clear indicators for measuring progress.

The following deficiencies were noted by the evaluation mission. It is believed by the evaluation mission that these deficiencies can be corrected within a reasonable period of time.

- The lead institution has not exercised adequate management authority over subcontract personnel, allowing for the persistence of uncertainty in reporting, responsibilities, and relationship to CWS staff. Despite a January 1996 effort by the DAI Senior Vice-President, sub-contract staff reported that management issues remain unresolved. While this reflects the difficulties that sometimes emerge among partner institutions, the lead institution remains responsible for enforcing decisions that affect project implementation. Direct mediation by USAID/Nairobi may be requested, if necessary.
- The lead institution has not provided sufficient guidance and oversight to CWS staff and contract technical assistance personnel in key areas, e.g. training, WDF/RS guidelines, proposal preparation and review, and funds accountability. While it is always necessary to be sensitive to the need for independent action and problem-solving, persistent shortcomings in the above areas could have been remedied by timely advice and technical supervision.

The African Wildlife Foundation is the principal subcontractor on the project. AWF has a long history of involvement with community conservation in Kenya and in other countries in the region. AWF provided a bridge function under its USAID-funded Tsavo Grant allowing for the recruitment and hiring of the first Assistant Director of the CWS and the Training Coordinator. AWF headquarters staff also provided valuable assistance in the drafting of guidance for revenue sharing and later the Wildlife for Development Fund guidelines.

The evaluation mission has been impressed by the quality of the effort provided by the field staff seconded to CWS, and especially by the contribution made to the community program by the Coordinator of field operations. The performance of AWF at the headquarters level, however, has not been as positive. The evaluation mission found that the COBRA Project has not been able to make full use of the expertise of AWF personnel assigned to the project.

While AWF has contributed in a number of very substantial ways to project implementation, deficiencies were noted in the following areas.

- Despite the assignment of a full-time Assistant Training Coordinator, the management of the modular course, especially in scheduling and insuring that the designated participants could attend, was disappointing.
- Technical guidance to the M&E unit, especially in developing impact indicators and data collection strategies, has been inadequate. This activity was later taken up by the lead institution due to concern over the lack of progress.
- The performance of the Enterprise Development Specialist, especially in providing substantive advice to communities, FPCs and CWOs, has been modest. The review of WDF proposals, budget projections and acceptable expenses has been deficient.

- The analysis of data collected in the 1993 Knowledge, Attitudes and Practices surveys in Tsavo and Amboseli was not available until the end of 1995, and then only for the Amboseli area.

Management Systems International (MSI) has provided limited short-term technical assistance to the COBRA project, in particular in the area of curriculum development. The original project design called for substantial international training, and MSI was to coordinate overseas training activities. With the decision to hold training in Kenya and in regional institutions, the role of MSI was substantially altered. The mission found their performance to be fully acceptable.

12. USAID Performance

The USAID Mission's performance in supporting and facilitating implementation of the COBRA project has been mixed. Project management and oversight has been adequate. The Project Officer held regular meetings with project staff and KWS management, attended multi-donor meetings, and generally provided continuity to the project despite changes in personnel. In April 1995, USAID hired a Project Manager for COBRA to provide more systematic support and oversight to the project. The person selected is highly qualified and has contributed in a number of positive ways to facilitate implementation of the project. In August 1995, a COBRA Steering Committee composed of staff from key divisions of the USAID Mission was established. This action has broadened the effective oversight provided by USAID while providing increased opportunities for offering effective guidance.

The most serious deficiency in USAID performance relates to the delays experienced in approving the contract amendment requested in late 1994. Approval was not provided until July 1995. While personnel changes in the Contracts office undoubtedly contributed to the delay, it still appears excessive and has resulted in a considerable delay in procuring essential project vehicles and equipment.

13. Action Recommendations

| ACTION RECOMMENDATIONS | | |
|--|--|-----------------------|
| ISSUE | ACTION | TIME FRAME |
| Institutional Concerns | | |
| Need for clarifying and updating CWP objectives, priorities, action modes, and procedures | Develop strategic framework for CWP in collaboration with D/KWS, Research & Planning, Wildlife Services, and Commercial Depts. | September 1996 |
| Staffing does not match program needs and priorities | Establish and implement revised staffing plan | May 1996 |
| Difficult to target community conservation interventions to priority biodiversity areas/issues | a) Establish Task Force with R&P, Elephant Prog., and external experts to identify critical intervention areas | May 1996 |
| | b) Assist with reorientation of research program to applied wildlife mgmt and conservation focus | September 1996 |
| Inadequate links with NGOs, private enterprises, external specialists | a) Establish procedures for identification, monitoring, and performance evaluation | March 1996 |
| | b) Initiate pilot contracts | April - July 1996 |
| Lack of cost consciousness in program planning | Develop cost standards and expense guidelines for common activities/investments, e.g. workshops, training, tours, projects | February - April 1996 |
| Community-based Activities | | |
| PRA implementation and methods are not systematic and require revision | Hold review meeting with outside facilitator of PRA experience and future program | April 1996 |
| CWP activities do not adequately target or provide benefits to women | Include gender as a priority in defining and developing social investments and ED activities | Immediate |

| ISSUE | ACTION | TIME FRAME |
|---|--|--|
| WDF/Benefit Sharing | | |
| History of revenue sharing has led to dependency, entitlement attitude in some areas | Establish transition plan and timing for tying WDF/BS directly to conservation behavior | August 1996 |
| Proposals are highly variable and not cost sensitive. Unrealistically raise community expectations. | Establish criteria for acceptable expenses, cost standards for common items/activities | September 1996 |
| Viability of some ED projects is questionable | Require more rigorous financial review and market analysis | Immediate |
| Environmental review procedures inadequate and large backlog exists on WDF proposals | a) Establish level of review criteria with R&P b) Provide sufficient resources to resolve backlog c) Participate in defining KWS EIA strategy | May 1996 April-Dec. 1996 Feb. - March 1996 |
| Monitoring and Evaluation | | |
| M&E function is not given adequate priority within CWS | Organize staff meeting to discuss data requirements and importance of M&E for planning, project design, implementation, management. | June 1996 |
| Current system does not allow for determining impact on behavior or resource base | a) follow-up KAP surveys in Kajiado District b) Initiate pilot analysis of change in biophysical indicators in select areas of Kajiado focal area. Coordinate with R&P c) If successful, apply to other focal areas d) Follow-up assessment for Kajiado | July 1996 Oct. 1996-Feb. 1997 March - Nov. 1997 November 1997 |

35

ANNEX 1

Mid-Term Evaluation: COBRA Project

Institutional Considerations

1. Introduction

The project grant agreement for the Conservation of Biodiverse Resource Areas (COBRA) project was signed on April 14, 1992. It is a core component of the multi-donor funded Protected Areas and Wildlife Services (PAWS) program. The grant agreement provides for up to US\$7 million of funding to support the development of a community wildlife program in Kenya Wildlife Service. A technical assistance contract with Development Alternatives, Inc. (DAI) as the lead institution and African Wildlife Foundation (AWF) and Management Systems International (MSI) was funded under the grant to provide management support, training, short-term technical assistance, and policy studies on wildlife conservation and management to the Community Wildlife Service (CWS) of KWS. Implementation of COBRA began with the arrival of the Chief of Party for the institutional contract in January 1993.

The objectives of the project are clearly stated in project documents and remain fully realizable three years into implementation.

- The goal of the COBRA project is to promote socio-economic development through conservation and sustainable management of Kenya's natural resources.
- The purpose of the project is to increase the socio-economic benefits to communities living adjacent to Kenya's parks and reserves from conservation and sustainable management of wildlife and natural resources.

Significant progress has been made toward attaining the stated purpose of the COBRA project. Benefits have been generated for communities residing in major dispersal areas for wildlife and adjacent to National Parks and Reserves, primarily through revenue sharing and to a more limited extent from enterprise development. Perhaps more important, community attitudes toward KWS as the steward of the nation's wildlife resources and toward the possibility of deriving meaningful economic and other benefits from community-based conservation and management have radically changed, especially in the focal areas of the COBRA project.

The evaluation mission has developed specific recommendations that it feels will permit USAID and the COBRA project to assist CWS to capitalize on the gains made and to recover quickly from shortcomings in project performance to date. In the following sections, attention is paid to the principal institutional and organizational issues arising from project implementation, including capacity, integration, management, and sustainability. Particular attention is also given to the status and potential of attempts to build partnerships with other government agencies, NGOs, and private

individuals and enterprises, as called for in the project paper and grant agreement. Finally, contractor and USAID performance in implementing the COBRA project is assessed.

2. Building Institutional Capacity

One of the key tasks of the COBRA project and USAID's program of support to KWS was the establishment of a capable Community Wildlife Service headquarters staff and a field presence in the four focal areas: Laikipia, Samburu, Kajiado, and Coast. The Project Grant Agreement specified five positions to be financed from the grant on a declining basis, with KWS assuming full salary responsibility at the end of the project. The original positions were: Assistant Director (the head of the Community Wildlife Service), Training Coordinator, Community Organization Specialist, Wildlife Utilization Specialist, and Field Program Coordinator (FPC). It became clear during the first year of implementation that this core staff would have to be increased and three more FPCs and a Monitoring and Evaluation Specialist were added to the list. One of the original FPCs was later placed in charge of the Problem Animal Management Unit (PAMU).

Additional personnel are provided through the institutional contract. The institutional contract identifies two "key" positions: the Chief of Party and the Enterprise Development Specialist. Two technical assistance positions have been added to support field operations (one as the Coordinator of field operations, and the other as FPC for the Amboseli/Tsavo area. A data management specialist was added in 1994 to assist in the M&E unit. With the amendment of the Grant Agreement in 1995, a finance specialist was hired to handle the increased workload caused by the decision to pass the USAID grant contributions to the CWS through the institutional contractor so as to expedite invoicing and the transfer of funds to KWS.

Overall, the personnel recruited to staff CWS and those provided through the institutional contract have been capable and dedicated to the task of building a community conservation program within KWS. Given the scale of the task and the number and size of intervention areas, the staffing of CWS and the technical assistance positions provided have been both necessary and reasonably effective for the needs of a new program. Now that CWS has accomplished some of its objectives, especially in terms of reorienting attitudes toward community involvement within KWS, developing an approach to working with communities, and establishing a curriculum for training in community wildlife, it is an appropriate time to reassess staffing needs and the future role of KWS in implementing specific aspects of the community wildlife program.

2.1 Organization of the Community Wildlife Service

The Community Wildlife Service is a division of the Wildlife Services Department and is headed by an Assistant Director. CWS consists of six technical units: Utilization, Problem Animal Management

(PAMU), M&E, Training, Community Mobilization, and Enterprise Development. At the present time, the person in charge of each unit is employed on a technical assistance contract paid from the USAID grant or institutional contract in the case of the Enterprise Development Specialist. There is also a Coordinator for field programs at the headquarters who is provided by AWF under their sub-contract agreement. The Community Mobilization position has been vacant since May 1995 and is to remain vacant while CWS undertakes a review of its organizational requirements. The PAMU consists of a Fencing section headed by an engineer seconded from the Technical Department and a Problem Animal Control Unit headed by a uniformed officer.

Field operations are managed by Field Program Coordinators in conjunction with Community Wildlife Operators (CWO). Three FPCs were hired in April 1993 and a fourth came onto the project in January 1994. The FPCs are all uniformed officers at the Warden I level and above who were recruited from within KWS and placed on technical assistance contracts reimbursed by USAID. The FPCs were based in Nairobi until fall of 1994 when they set up residence in their respective focal area, as recommended by the July 1994 COBRA assessment mission. The movement of these critical staff from headquarters to the field after a long period of demobilization linked to the political and organizational difficulties afflicting KWS resulted in a very significant increase in community-based activities, capacity building, and active wildlife extension interventions. Their active involvement with communities in the focal areas as representatives of KWS's commitment to community conservation is a major factor behind the positive change in community attitudes toward wildlife conservation and KWS.

The CWOs are generally the warden-in-charge at the district level. In a few cases, CWOs were recruited from outside and employed directly by KWS. This is the case, for example, of the CWO in Kwale District in the Coast region. These officers were the focus of many of the training and study tour opportunities developed by CWS, including the ill-fated first offering of the CWO Modular Course in 1995. Since most of the senior CWOs were unable to attend the first session, it is strongly recommended that the second offering be scheduled with full participation of the prospective participants and that the "modular" character of the course be utilized to avoid prolonged absence from post of these important officers.

The role of the FPC and CWO has often overlapped in practice, since both were generally responsible for implementation of the community wildlife program at the district level. While there may have been some inefficiency in this arrangement, the apparent duplication of function provided a very useful mechanism for training the generally less experienced CWOs in the philosophy, objectives, and procedures of the community conservation program. With the recent decision to broaden the effective planning base for the focal areas to include neighboring districts that are part of the same ecological zone (Focal Areas and their Neighbors), the "coordinating" aspect of the FPCs role is becoming more apparent at a point where the "apprenticeship" of the CWOs is no longer needed. In the three principal focal areas visited by the evaluation mission, it was the mission's view that the CWOs were effective advocates of the community conservation philosophy of KWS and fully capable of implementing the program in their jurisdictions.

While the structure of the proposed Partnership Program under the reorganization plan is unclear, it would be reasonable to assume that the FPC positions would be taken up by the regional offices and

that implementation in the field would continue to involve the field wardens as CWOs. A stronger role in community capacity building, project identification, design and implementation, training, and technical assistance would be accorded to organizational partners, such as NGOs, community-based wildlife organizations, and specialist individuals and institutions.

There are two FPCs assigned to Kajiado District. One has been assigned responsibility for Nairobi and northern Kajiado. An AWF staff member with long experience in the Amboseli/Tsavo area who was seconded to CWS to support the community wildlife program was designated as the FPC for southern Kajiado by the AD/CWS. While the individual serving in this position is highly qualified and committed to community conservation, his posting is more a reflection of the political sensitivity of the area than an objective need for coordination of field activities. This anomaly may have developed in response to the political sensitivity of the area, but the present arrangement lacks merit both from an organizational and a cost standpoint and should be resolved.

2.2 Staffing Considerations

The Wildlife Utilization unit and PAMU have the closest ties with the other departments and branches of KWS. The PAC section in particular works closely with wardens and rangers on the ground. The Fencing section head is often called upon for technical guidance related to fencing projects undertaken by other branches of KWS. Indeed, there exists an unproductive level of ambiguity regarding who is responsible for fencing activities and the process for review and implementation of fencing projects. While all proposals for establishing wildlife barriers should be reviewed and approved by CWS, the physical construction of fences would best be left with the technical services branch of KWS. Guidelines for community involvement in siting, design of the barrier (especially points of entry), and in providing labor for construction should be established by CWS and monitored by CWOs in the field.

Similarly, consideration should be given to the need for a Problem Animal Control capability at the central level. With the regionalization of KWS, PAC capacity should also be decentralized. Technical guidance in wildlife management applicable to PAC should be the responsibility of the Research and Planning Department (Biodiversity Conservation Department in the proposed structure) since research activities under the new structure are to focus more concretely on the wildlife management needs of the Service.

Now that CWS has accomplished some of its objectives, especially in terms of reorienting attitudes, developing an approach to working with communities, and establishing a curriculum for training in community wildlife management, it is an appropriate time to reassess staffing needs and the future role of CWS in implementing specific aspects of the community wildlife program. Some positions, such as the FPCs are essential to the Community Wildlife Program and to KWS and should be retained. There will continue to be a clear need for community conservation specialists in the new regional offices and the transition from Field Program Coordinator to Regional Partnership Coordinator is a logical one. Others, such as the Fencing Specialist, PAC head, PAMU head, and

Training Coordinator will need to be reviewed both on performance criteria and in regard to the appropriate organizational lodging for the functions performed.

By streamlining the structure and focusing on the core functions over the next two years of project implementation, CWS will be in a much better position to emerge as a strong and viable program as donor funding declines. The rather alarming shortfall of budget revenues compared to expenses anticipated for the current fiscal year and the near-term makes it highly unlikely that KWS will be able to maintain the higher salary levels currently enjoyed by key CWS and KWS staff on technical assistance contracts.

Three staffing issues need to be addressed in the near term. First, there is a clear need for a senior staff position within CWS to coordinate field operations and insure that the objectives of the KWS program in community conservation are understood and implemented effectively. The AD/CWS currently lacks a deputy who can be charged with the day-to-day oversight of the program. At the present time, field activities of the FPCs are supported by a very capable and experienced individual provided under the institutional contract. Since this position is not a line position, his role is more advisory than hierarchical, thereby weakening the effective supervision that he is able to provide to field activities. It would be to the advantage of CWS to offer a line position reporting directly to the AD/CWS to this person at the end of his contract.

Second, given the status of training and community mobilization accomplishments to date, serious consideration should be given to eliminating both posts or at least combining these positions into one line. Specifically, there is no longer a justification for a separate training coordinator position in CWS. This position was of great value during the early years of CWS as efforts focused on changing the organizational culture within KWS. With the development of a community conservation module for staff training and the strengthening of training capacity in the Human Resources Department, the need for a separate staff position for training within CWS no longer exists.

Finally, a line position responsible for enterprise development should be established within CWS. At the present time, the function is provided through the institutional contract with no designated counterpart within CWS. Expertise in enterprise development is essential to the further development of income-generating activities within the community conservation framework, even if the responsibility for implementation of these activities is increasingly shared with organizational partners.

Recommendations:

- A staffing plan should be developed that reflects the current and anticipated needs of the CWP. Attention should be given to reducing essential staff numbers while taking necessary measures to insure that key functions e.g. the Field Operations Coordinator and Enterprise Development Specialist are assigned to line rather than technical assistance positions.
- The continuation of technical assistance contracts for key CWS personnel should be reviewed as part of the KWS plan for long-term institutional development and financial sustainability.

3. Integration within KWS

While the CWS is a formal division within KWS, its effective integration into the larger organization has been limited by three factors. First, as a division within the Wildlife Services Department, the head of the CWS does not participate in KWS Executive Committee meetings but must depend on representation by the head of the Department. The latter is a seasoned uniformed officer with broad experience in park management but little familiarity with community conservation strategies and programs. This has resulted in a lessened visibility of community wildlife program priorities and concerns in senior level planning and decision-making. Some senior managers appear to be unaware of the challenges facing KWS in the area of community conservation and downplay the importance of creating a sustainable wildlife establishment through involving communities and landholders in active wildlife conservation and management. Community conservation for some is a peripheral issue to the core concerns of managing protected areas and carrying on the traditional business of a wildlife agency. While the Director of KWS is clearly a strong supporter of community conservation, the failure to include the CWS head in executive meetings has undercut the importance of this function to the organization. It has also presented a serious obstacle to the effective transmission of clear policy and operational guidance to CWS.

Second, since its establishment in 1992 both of the Assistant Directors of CWS have been civilians (and women), whereas the great majority of employees, and virtually all of the field staff, are uniformed employees of KWS. When the CWS was established, a division of responsibility was concluded whereby KWS staff outside the protected areas came under CWS while all staff inside protected areas remained under the Parks and Reserves Management division, which is also in the Wildlife Services Department. Since the wardens and rangers in the districts must work closely with communities in carrying out their principal tasks of Problem Animal Control, security and law enforcement, this division of responsibility appeared to be reasonable. In practice however, the division has been less than successful. Personnel management decisions were often made at the department level, without adequate consultation with the AD/CWS. More important, some uniformed officers found it to be inordinately difficult to report to and accept orders from a civilian and instead reported directly to the Deputy Director of Wildlife Services. Tolerance for such behavior undercut the standing and authority of CWS and its senior management. However, with time there appears to be a partial resolution of the problem and district wardens are now taking a more active role and interest in the community program.

The planned reorganization of KWS calls for the establishment of three programs, one of which is Partnerships and would include the community wildlife program, that are distinct from operations. While the details of the reorganized structure are still unclear, it appears to offer a resolution to the problem by placing all wardens and rangers (i.e. uniformed staff) in operations. The community wildlife program would be implemented in the regions by program staff in collaboration with wardens in the field, but CWS would no longer be administratively responsible for the uniformed operations staff.

Finally, the objectives and accomplishments of the Community Wildlife Program, CWS, and the

COBRA project have not been effectively promoted within KWS or with external publics. The failure to promote effectively the central role of CWS in guiding community conservation activities is demonstrated by the lack of references to the program or service in news releases carried by the national press and in articles in the KWS in-house newsletter. It should also be noted that the role of USAID in supporting KWS and in financing COBRA has been given little visibility compared to other donors, including some whose monetary and technical contributions are considerably less substantial.

At a broader level, the active promotion of KWS senior managers and their programs should be encouraged. Past experience has demonstrated the negative effects of over-identification of an institution with its chief executive. While it is not always possible to convince the news services to broaden their focus, the KWS public relations office should make a point of producing news releases and other publicity materials that recognize the important contributions of other employees to the successful operation of Kenya's valuable protected areas.

Recommendation:

- The transition period for the proposed reorganization is to be approximately 18 months, with most of the planning and detailed reorganization decisions to be made within the next six months. This would be a good time to invite the AD/CWS to participate in Executive Committee meetings. Improved communication at this critical time will greatly improve the ability of the CWS to fulfill its new role in the Partnerships Program.
- Promotion of Community Wildlife Program as the expression of KWS policies and priorities in community conservation should be emphasized in press releases and the KWS Newsletter. Other senior managers and their programs should also be highlighted in public relations so as to broaden the public perception of leadership within KWS.

4. Management Issues

The establishment of a new service that combines both headquarters and field operations is bound to face imbalances in the level of development of management systems and procedures. A concentration on management systems in the absence of action in the field is seen as unproductive bureaucracy while action in the field without basic procedures and management systems often leads to a lack of accountability, fragmentation, and the inability to capture the lessons of experience to improve future performance.

Overall, the CWS has managed to avoid falling into either of the extremes. The COBRA project has committed substantial resources to training in management and community development methods, the development of work plans, the establishment of guidelines for funding, and the development of a monitoring and evaluation capability. Regular meetings are held that bring field staff into Nairobi to meet with HQ staff. The AD/CWS, the COP, and the Coordinator of field operations are also frequently in the field and provide useful guidance to the FPCs and CWOs while bringing back a

better understanding of the complexities of implementation.

Nevertheless, there are clear deficiencies in some key areas. It should be noted that in most cases the deficiencies found in CWS are replicated at the level of KWS as a whole, and often in a more severe and troubling form. First, there are not adequate mechanisms or procedures in place to insure that the organization can learn from the implementation experiences in the focal areas. The COBRA project is essentially a "pilot" or experimental exercise to establish effective community-based wildlife conservation and management practices in key areas of economic and biodiversity importance. If CWS does not become a "learning" organization, the benefits of the pilot program concept will be lost. For experience to be meaningful, there must be a common basis for the development of programs in each focal area, with clear definition of those aspects of the program that are to be "piloted" in each area.

At the present time, the drive to launch local enterprise activities and community development projects appears to have outpaced the ability of the organization to monitor and appraise the strengths and weaknesses of past efforts and current initiatives. In some cases, existing guidance regarding issues such as the financing of recurrent costs under WDF/RS does not appear to be applied systematically. In other cases, similar activities and investments such as construction of a school or establishment of a cultural *boma* or center have very different costs and operating assumptions. There may be very valid reasons to explain the differences, but unless these reasons are explained and the outcome effectively monitored, no learning of the relative strengths and weaknesses will occur.

A related problem is the failure to establish an ethic of cost consciousness in activities sponsored by CWS, whether they are paid out of the grant, from KWS operating funds, or from the Wildlife for Development Fund. This has been most obvious in the case of study tours and training sessions. While both activities are essential parts of the program, it is important that the choice of accommodations and venue for the events do not convey the message that KWS is afloat in donor money. Similarly, by submitting proposals for funding under WDF/RS that include unrealistically high salaries for local staff - even when salary support is not requested from KWS - there is a danger that community expectations for benefits are overstated and that the very real risks associated with most community investments and tourism-based enterprise ventures have not been adequately stressed. Finally, a lack of attention to costs may also encourage the development of undesirable practices, such as the offering of favors by hotel operators, or the giving of gifts following the acceptance of a WDF-funded activity. While there is absolutely no grounds to assume that any improprieties have taken place to date, the evaluation mission is concerned that even the perception of corruption, however groundless it may be, would have a negative effect on the program and on KWS.

A third management issue is the lack of adequate integration of the Monitoring and Evaluation unit into CWS. M&E personnel feel that their role is poorly understood within the organization and have experienced difficulties in obtaining the cooperation of field personnel in collecting the data required for effective monitoring. The establishment of a learning organization depends on effective information collection, analysis and communication. This is the core task of the M&E unit and must be given greater priority within the organization. Senior management must become more comfortable and knowledgeable in the use of M&E data for management decisions, planning, program development, and the traditional function of output and impact determination. Adaptive management

is especially information dependent and requires a capable M&E unit to provide the basic information required for making effective decisions.

Recommendations:

- Operational guidelines and procedures for field activities should be reviewed and deficiencies corrected as soon as possible. Develop cost standards and expense guidelines for common activities and investments, e.g. workshops, training, tours, and construction projects.
- Organize staff meeting to discuss data requirements and importance of M&E for planning, project design, implementation, and management decision-making.

5. Partnership Strategy

The original conception of the community program for KWS, as developed in Annex 6 of the KWS Policy Framework (“Zebra Book”), the COBRA Project Paper, and the Grant Agreement, placed substantial importance on developing partnerships with other organizations. Other governmental agencies, NGOs, community groups, and private individuals and enterprises were to take part in conducting studies, working with communities to define their needs and priorities, providing technical guidance and training, and even implementing community conservation projects and activities. The implementation experience to date suggests that CWS has largely failed to enact this vision of partnership and has instead focused on developing internal capacity rather than seeking outside collaborators.

That said, it must be acknowledged that the development of partnerships is neither easy nor without considerable costs and risk. A meeting with NGO representatives organized as part of the World Bank Mid-Term Review of PAWS suggested that most of the national conservation NGOs lack the capacity and experience to work effectively with community organizations. Furthermore, their participation in wildlife conservation and management activities would require substantial funding from KWS or donors. WDF guidelines allow for NGO and private sector participation as long as the communities concerned agree to work with the organization. The high cost of private and NGO technical assistance is treated warily by communities when it becomes clear that the cost of their involvement may rival or exceed the cost of the desired activity or project.

CWS has had some positive experience of working with local NGOs to provide specialized training in areas such as cultural understanding and financial management. Similarly, the experience to date with research and training institutions such as Egerton University for Participatory Rural Appraisal training has been encouraging. There has also been some success in identifying private sector investors who are interested in collaborating with local communities to develop tourism ventures. These initiatives need to be reviewed and appraised and the lessons applied to develop a more effective and structured approach to building partnerships. When possible, preference should be given to community-based organizations that demonstrate sufficient organizational experience and capacity to implement a given

task. Such groups are generally much less expensive than national and international NGOs and have the added advantage of being local and investing locally. In all cases, it will be essential that the perception of conflict of interest is carefully avoided. This is true both when dealing with conservation organizations and private firms. KWS should favor strict open tender contracts when dealing with its partners and should carefully monitor performance and effectiveness of all parties.

Recommendation:

- Establish procedures for identification, monitoring, and performance evaluation for NGOs, research and training institutions, and private individuals and enterprises.
- Once a system is in place, initiate pilot contracts on a competitive basis when possible with capable institutions for well-defined tasks.

6. Interest Aggregation and the new Wildlife Associations

One of the more promising developments in the last year of implementation has been the emergence of a number of wildlife associations that represent a broader range of interests than the group ranch or private landholder. In some cases, these associations also provide the basis for area planning that is more consistent with ecosystem concerns than are the individual units of which the association is composed. Among the first such associations was the Ol Choro Oirua Wildlife Association in Narok district which was established in the early 1990s. While this particular association has been criticized as representing the interests of a small number of private landholders, other associations have emerged that represent a number of group ranches or a combination of group ranch and private landholders. The Amboseli-Tsavo Wildlife Association, for example, is comprised of representatives from the four group ranches adjacent to Amboseli National Park and the two group ranches bordering Tsavo West National Park. This association was established with the strong support of the Director of KWS. It was registered under the Companies Act in July 1995 and is to represent the interests of the group ranches while providing a forum and management mechanism for wildlife conservation and management programs. The specific objectives and priorities of the Amboseli-Tsavo Association will become more clear as the members and leaders gain experience.

Another association that was just recently registered is the Laikipia Wildlife Forum. This group first began meeting in 1992 and actively sought registration nearly eighteen months ago. The group was initially composed of a number of large private landholders of European ancestry. It became clear to them that it was necessary to include members from the neighboring group ranches and farming communities for their application to be treated positively by the authorities. The Forum has been involved in wildlife cropping on a pilot basis and hopes to be granted authority for sport hunting should the ban be lifted. The members are also involved in some wildlife tourism activities.

Other associations that have been established with the assistance of the Community Wildlife Program include the Association of Mt. Kenya Operators (AMKO) which seeks to improve the management of

the tourism industry around Mt. Kenya while contributing to conservation and the involvement of local communities in conservation programs, the Wamba-Waso Conservancy which consists of 12 Group Ranches and the Namunyak Wildlife Trust, the Leroghi-Kirisia Conservancy composed of 34 Group Ranches and six private ranches, and the Mombasa Boat Operators Association composed of six branches and over 160 members. Some of the groups have already been registered under either the Companies Act or the Societies Act while others are in the process of submitting their registration documents. Other local associations such as Group Ranch wildlife committees are registered as self-help organizations.

The viability of these various associations is unclear. Some groups, such as the self-help organizations, are organized at the grass-roots level and have a clear purpose that is generally understood by all members of the association. Others, such as the Conservancies in Samburu represent an attempt to create a framework for wildlife conservation and management planning at a level more consistent with the ecosystem. The Group Ranches in the area are not well structured and individual members most likely have never heard of the Conservancy of which their Group Ranch is a member. The lack of a solid foundation may prove to be a serious detriment to these Conservancies in the long run. Nevertheless, they represent a potential forum for discussing important issues regarding land use, tourism development, wildlife conservation and management, and community development that has not existed to date. The CWS should focus their efforts, in collaboration with other government services and NGOs in the area, on the development of awareness and management capacity in the Group Ranches and among the members of the numerous management committees.

The strategy of encouraging the development of popular associations as a means of ensuring public participation and involvement in key resource issues has a long history in Kenya and in Africa as a whole. The lessons learned from past experiences consistently underscore the importance of building the base first and then allowing the base to determine what other levels of coordination, if any, are desired. This would suggest that efforts at creating wildlife associations should focus locally first. District level associations may emerge as local associations see a need for higher level representation. The promotion of a National Wildlife Association at such an early stage of organizational development, however, seems premature. Given the volatility of national politics, it is quite possible that a "national" organization, even one that has no meaningful support from the base, might be viewed as a political manoeuvre rather than simply as a vehicle to raise community wildlife issues at a higher level forum. The more visible the organization, the more it will be subject to attempts to co-opt or neutralize it from partisan political forces. The risks attendant to this as the country approaches national elections in 1997 would seem to outweigh by far the advantages of launching a national association before the work on the ground has taken hold.

7. Review of Draft Wildlife Policy of 1996

The draft Wildlife Policy of 1996 is based on a review of the 1975 "Statement on the Future of Wildlife Management Policy in Kenya", the results of the December 1994 study commissioned by the

Board of Trustees entitled “Wildlife-Human Conflicts in Kenya”, and sectoral studies on wildlife utilization, land use policies, tourism, and legal issues. The draft policy proposes the restructuring of KWS on a regional basis following ecological zones, the decentralization of wildlife use rights, the promotion of consumptive and non-consumptive utilization as the primary means of insuring that benefits from conservation flow to those who suffer the depredations of wildlife, and the linking of use rights with responsibilities. KWS as an organization would move away from a protectionist toward a regulatory function, placing management of biodiversity including wildlife outside of the protected areas in the hands of “partners” while retaining responsibility for the direct management of protected areas and the supervision, monitoring and enforcement of biodiversity conservation laws and regulations as needed.

The draft policy is a wide-ranging review with equally wide-ranging recommendations. A core aspect of the proposed policy is the broadening of KWS’s mandate from wildlife to biodiversity conservation in a more holistic sense. Another key aspect of the draft policy is the restructuring of the organization along ecosystem rather than administrative boundaries. Both of these changes require a level of scientific understanding and analysis that are posited or assumed to exist but are not demonstrated or proven to be accessible to KWS at this time.

The general provisions on community conservation of the proposed policy are consistent with the principles laid out in the Zebra Book and by CWS and the COBRA project regarding the importance of enabling communities and individual landholders to participate directly in the benefits of wildlife conservation and management. Furthermore, the draft policy is consistent with the emphasis on developing partnerships with key stakeholders: landowners, traditional authorities, communities, NGOs and public agencies, among others. The current emphasis by CWS on promoting and assisting with the creation of wildlife associations and similar groups is recognized and supported in the draft policy as well. In short, the principles and recommendations proposed in the draft policy are generally consistent with the goals, objectives and current program initiatives of CWS and the COBRA project.

The draft policy goes farther, however, by calling for lifting of the hunting ban and other legal provisions that restrict the range of uses that landowners and other “competent authorities” may make of biodiversity resources in areas outside the Parks estate. Instead, the policy proposes that the State, through KWS, retain ownership of biodiversity resources (specifically wildlife) while granting use rights linked to responsibilities to competent authorities at the local level. These competent authorities would be required to draw up management plans that would be approved and their implementation then monitored by KWS. The evaluation mission did not issue a position on the lifting of the hunting ban, other than to note that at the present time and with the present human and logistic resources, it is highly unlikely that KWS would be able effectively to monitor and enforce hunting quotas and prescribed wildlife management practices outside of protected areas.

The restructuring of KWS along regional lines would not necessarily prejudice the implementation of the principles and programs of CWS or the COBRA project. As mentioned in a preceding section, the COBRA project has already adopted an approach that is consistent with ecological rather than strictly administrative jurisdictions in implementation. However, the program priorities and operational capacity of the proposed Partnership Department are largely unknown. By moving toward a regional

program, the concentration of COBRA resources on the four focal areas may prove difficult to maintain. While the current system of Field Program Coordinators supported by CWOs should survive the transition to a regional program, the CWS itself will likely disappear with most of its functions transferred to the Partnership Department. Responsibility for uniformed personnel outside of protected areas would no longer fall under CWS or the Partnership Department but instead would revert to the operations structure of KWS.

These changes may lead to a better integration of the primary components of the Community Wildlife Program throughout KWS operations. The emphasis on accomplishing community conservation objectives through effective partnerships is consistent with COBRA principles and objectives. It is too early to determine with any certainty, however, whether the regionalization program as a whole will improve KWS's ability to fulfill its wildlife management and conservation objectives or simply prolong the already disconcerting period of institutional uncertainty and weakness of key organizational and financial management systems.

8. Contractor Performance

Each member institution of the DAI/AWF/MSI consortium has contributed to the implementation of the COBRA project. Overall, the level of technical assistance has been adequate to excellent and the consortium members have managed to provide technical inputs in a timely and capable fashion with a few exceptions. While the mission did not make a detailed assessment of reporting by the institutional contractor, the quarterly and annual reports reviewed by mission members provided useful information, concrete action plans, and reasonably clear indicators for measuring progress. Contract staff also attended regularly scheduled meetings called by the USAID Project Officer and provided timely responses to queries from USAID and other interested parties.

Due to chronic delays ranging from eight to fifteen months by the KWS finance office in processing reimbursement claims for USAID funding, the institutional contractor agreed to facilitate reimbursement (and thereby improve cash flow for KWS) by passing and accounting for grant funds through the institutional contract. While delays continue to occur, this arrangement has proved satisfactory to date. Financial management problems continue to plague KWS, making this rather innovative mechanism for channeling funds in support of project actions of continued relevance.

8.1 Development Alternatives, International (DAI)

DAI is the lead institution in the consortium and has provided strong overall project management and technical backstopping. DAI's sole long-term Technical Assistance position is the Chief of Party to the COBRA Project. There have been two COPs since the project began in January 1993. The current COP has been on the job for a little over one year at the time of this evaluation. DAI has provided

short-term technical assistance (STTA) in a number of areas, including community-based planning and monitoring and evaluation.

The performance of DAI as the lead institution in the consortium has generally been good. The political and organizational crisis that afflicted KWS in 1994 seriously affected the performance of all units within the organization, including CWS and the COBRA Project. The change in personnel at both the level of the AD/CWS and the COBRA COP also presented significant discontinuity in the implementation of the program. Nevertheless, DAI senior management closely monitored implementation progress and took measures to alleviate problems when needed.

The following deficiencies were noted by the evaluation mission. It is believed by the evaluation mission that these deficiencies can be corrected within a reasonable period of time.

- The lead institution has not exercised adequate management authority over subcontract personnel, allowing for the persistence of uncertainty in reporting, responsibilities, and relationship to CWS staff. Despite a January 1996 effort by the DAI Senior Vice-President, sub-contract staff reported that management issues remain unresolved. While this reflects the difficulties that sometimes emerge among partner institutions, the lead institution remains responsible for enforcing decisions that affect project implementation. Direct mediation by USAID/Nairobi may be requested, if necessary.
- The lead institution has not provided adequate guidance and oversight to CWS staff and contract technical assistance personnel in key areas, e.g. training, WDF/RS guidelines, proposal preparation and review, and funds accountability. In other areas, technical assistance inputs have been substantial and effective.

8.2 African Wildlife Foundation (AWF)

The African Wildlife Foundation is the principal subcontractor on the project. AWF has a long history of involvement with community conservation in Kenya and in other countries in the region. AWF provided a bridge function under its USAID-funded Tsavo Grant allowing for the recruitment and hiring of the first Assistant Director of the CWS and the Training Coordinator. AWF headquarters staff also provided valuable assistance in the drafting of guidance for revenue sharing and later the Wildlife for Development Fund guidelines.

AWF has one long-term Technical Assistance position funded under the contract in the form of the Enterprise Development Specialist. Two individuals have held this position, with the current EDS assuming his responsibilities in December 1994. In addition to the EDS position, AWF has seconded two community conservation specialists to CWS, a data management specialist, and an Assistant Training Coordinator (completed in December 1995). Headquarters short-term technical assistance is also quite substantial, with a Community Conservation Coordinator provided at 60%, an assistant training coordinator at 50%, and other staff providing assistance to COBRA as needed. Short-term technical assistance is also provided by AWF, with 20 months allocated for the life of project,

excluding STTA for training.

The evaluation mission has been impressed by the quality of the effort provided by the field staff seconded to CWS, and especially by the contribution made to the community program by the Coordinator of field operations. As mentioned above, AWF has also provided substantive guidance to the development of the WDF and Revenue Sharing guidelines. The performance of AWF at the headquarters level, however, has not been as positive. The evaluation mission found that the COBRA Project has not been able to make full use of the expertise of AWF personnel assigned to the project.

While AWF has contributed in a number of very substantial ways to project implementation, deficiencies were noted in the following areas.

- Despite the assignment of a full-time Asst. Training Coordinator, the management of the modular course, especially in scheduling and insuring that the designated participants could attend, was disappointing.
- Technical guidance to the M&E unit, especially in developing impact indicators and data collection strategies, has been inadequate. Performance shortfalls in this area led the lead institution to assume responsibility for this function in 1995.
- The performance of the Enterprise Development Specialist, especially in providing substantive advice to communities, FPCs and CWOs, has been modest. The review of WDF proposals, budget projections and acceptable expenses has been deficient.
- The analysis of data collected during the 1993 Knowledge, Attitudes and Practices surveys in Tsavo and Amboseli was not available until the end of 1995, and then only for the Amboseli area.

8.3 Management Systems International (MSI)

MSI has provided limited short-term technical assistance to the COBRA project, in particular in the area of curriculum development. The original project design called for substantial international training, and MSI was to coordinate overseas training activities. With the decision to hold training in Kenya and in regional institutions, the role of MSI was substantially altered. The evaluation mission found their performance to be fully acceptable.

9. USAID Performance

The USAID Mission's performance in supporting and facilitating implementation of the COBRA

project has been mixed. Project management and oversight has been adequate. The Project Officer held regular meetings with project staff and KWS management, attended multi-donor meetings, and generally provided continuity to the project despite changes in personnel. In April 1995, USAID hired a Project Manager for COBRA to provide more systematic support and oversight to the project. The person selected is highly qualified and has contributed in a number of positive ways to facilitate implementation of the project. In August 1995, a COBRA Steering Committee composed of staff from key divisions of the USAID Mission was established. This action has broadened the effective oversight provided by USAID while providing increased opportunities for offering effective guidance.

The most serious deficiency in USAID performance relates to the delays experienced in approving the contract amendment requested in late 1994. Approval was not provided until July 1995. While personnel changes in the Contracts office undoubtedly contributed to the delay, it still appears excessive and has resulted in a considerable delay in procuring essential project vehicles and equipment.

ANNEX 2

Mid-Term Evaluation: COBRA Project

An Evaluation of the Social and Community Dimensions of the COBRA Project

1. Introduction

The purpose of the Conservation of Biodiverse Resource Areas (COBRA) project is to increase the flow of socio-economic benefits to communities through improved local management of wildlife and habitat. Like other community-based conservation programs in Botswana (Tropical Research and Development 1993) and in Zimbabwe (Metcalf 1994), the COBRA project is based on the assumption that communities will better manage their wildlife resources and habitats if they receive direct economic benefits from them. A second assumption is that local benefits and development can accrue to local communities (and households and individuals within them) through the establishment of a Community Wildlife Program (CWP) within the Kenya Wildlife Services (KWS). These are important premises that are stated in the COBRA Project Paper. A range of activities have been proposed to allow local communities to benefit directly from wildlife-related activities.

These include small enterprise development projects around parks and tourist facilities, eco-tourism activities, and wildlife utilization projects.

This section of the evaluation report assesses the social and community development impacts of the COBRA project. The organization of this part of the report responds to a series of questions/issues that were presented to the author by USAID/Kenya. These can be summarized as follows:

- (a) review and assess the KWS staff and communities attitudes toward the CWS community conservation approach;
- (b) assess the concept of enabling and empowering communities to manage and decide on the use of their own resources; and to share the benefits of wildlife and its impact on the conservation of biodiversity;
- (c) assess the Participatory Rural Appraisal (PRA) methodology as a tool for creating awareness and facilitating participation in decision making on resource use. Are the communities neighboring parks and reserves adequately empowered to access the revenue sharing/Wildlife Development Fund (WDF) in a sustainable way? Is there a risk of undue limitation or coercion in accessing and utilization of WDF in the future?
- (d) review and assess the capacity of community groups to respond to the present guidelines governing application to the WDF/Revenue Sharing funds and assess their training needs;

- (e) review the project's sensitivity to gender issues;
- (f) review and assess the project monitoring mechanism and suggest improvements;
- (g) assess the project's social impact on communities living adjacent to National Parks and Reserves;
- (h) review the modular course curriculum and comment on its appropriateness.

While each of these questions and issues are addressed, it was felt that some of them could be combined under a single heading.

In addition, certain issues not covered in the original SOW--but deemed important for this section--are presented.

Before discussing the specific findings of the evaluation mission, let me state at the outset that CWS (and COBRA) has achieved much under what have been very significant institutional, political, personnel, and administrative constraints. These have included: (1) the virtual halt of all activities for more than 6 months during 1994 when KWS was under scrutiny by the "Probe" committee and when the previous Director resigned; (2) the departure of key COBRA and CWS personnel during 1994 and 1995 (including the COBRA COP and the AD-CWS); and (3) the normal "growing pains" of creating a new institution (CWS). All of these factors slowed down the implementation of field activities by at least nine months. The difficulties of simultaneously creating a national institutional structure and a field-oriented program has created unavoidable tensions that also have affected the implementation of COBRA. In addition, it should be noted that working at the community level requires a long-term commitment that goes well beyond the time constraints of a normal 5-year project cycle.

Since January 1995 COBRA should be applauded for establishing a field presence in the three focal districts and the one "special" area (i.e., the Coast); for implementing several Participatory Rural Appraisals (PRAs) and Community Action Plans (CAPS) in the focal areas; and for beginning to establish a monitoring and evaluation system. With a strong field presence in the focal areas since late 1994, COBRA is at a critical juncture where it needs to assess what it has learned from the pilot community projects; to provide more attention to an overall planning framework to avoid what could develop into a series of discrete, unconnected community initiatives without a larger conservation and development agenda ("vision"); and to establish linkages ("partnerships") with local and international NGOs for implementation and other activities, which will allow CWS to focus more attention on planning, monitoring, and evaluation. While this section of the report evaluates the past performance of COBRA, it also looks to what can be done to improve performance during the next eighteen months and beyond.

The Incorporation of the Community-Based Approach within KWS COBRA has made a significant contribution in reorienting KWS staff to the goals and objectives of the community wildlife program, and in educating senior staff to perceive the importance of actively working with communities. This

has been achieved through a series of workshops and training sessions for KWS senior staff and others. During 1992 to 1994 more than 75

workshops and seminars were held for KWS field and headquarters staff to explain the objectives and goals of the Community wildlife Service (CWS), although there are still some senior wardens in the country who remain unaware of CWS initiatives. Overall COBRA has been successful in publicizing the mission of CWS and in many cases reorienting personnel to see community groups as clients or partners, rather than adversaries that need to be controlled. This attitudinal change is especially revealed in the two focal areas of Laikipia and Samburu districts, where the FPCs work very closely with the District Wardens, who in turn have become strong proponents of the CWS program. In this sense COBRA has importantly contributed toward the institutionalization of the community-based approach both at headquarter- and district-levels.

2. Overall Planning Framework ("Vision") for COBRA and CWS

The CWS program relies heavily on district-based personnel, especially Field Programme Coordinators (FPC), Community Wildlife Officers (CWO), and District Wardens (DW). Yet, until the later part of 1994 the FPCs were based at headquarters and unable to effectively initiate community support for wildlife management activities. Commuting from Nairobi to oversee activities and to work with District Wardens was an inefficient way to implement and test an experimental conservation program, and COBRA corrected this during the latter half of 1994. With the FPCs based in the field by late 1994, they have been in a favorable position to provide the kind of attention to local conservation activities upon which the success of the CWS program is dependent. The FPCs have achieved this by: (1) helping local communities and individuals understand the value and importance of wildlife conservation; (2) explaining the goals and objectives of CWS; and (3) identifying projects and proposals that might qualify for funding under the Revenue Sharing (RS)\Wildlife Development Fund (WDF) guidelines.

At this point, however, the FPCs and their programs would benefit from better coordination among themselves and with headquarters. While the COBRA workplan for 1995/1996 notes that it will no longer use COSUs (Conservation Units) for planning purposes, some of the districts still use an explicitly ecosystem model (COSU) for planning their activities (see CWS/Samburu District 1996). Thus, for planning purposes Laikipia is divided into 6 conservation units; Samburu into three large "conservancy" units; and Kajiado into a number of different group ranch units. The program in Samburu District has progressed the most in utilizing biodiversity criteria (i.e., mainly the importance of elephants to an area) for planning, and it has initiated strong contacts with neighboring administrative districts that share common ecological zones. However, there does not seem to be any agreement between field staff and CWS headquarters staff on what are useful, meaningful units for planning and for establishing priorities of where they should work within the district. With the "rush" to establish a field presence and to implement community projects, CWS seems to have lost sight of the need for a larger framework for planning and implementing activities. This type of framework was an integral part of earlier work of CWS and COBRA (see Smith and Ombai 1993).

While the strong field presence should be applauded, it is now time to place the community program into an overall strategy for CWS which will allow FPCs to assess what their funding priorities should be; where within the districts they should be concentrating; and what types of information are needed to assess the viability of RS/WDF proposals. Each of the FPCs are able to explain why a particular community site is an area of biodiversity importance (a critical criterion under RS/WDF guidelines), but the reasons often are based on their own assessments (e.g., in Samburu it is the importance of elephant dispersal routes) and are not rigorously applied in all cases.

CWS needs to strengthen linkages with the Research and Planning Department so that the latter can assist in mapping and identifying strategic areas of biodiversity importance. It is noted that with the planned reorganization of KWS, integrated ecosystem planning will receive increased importance as the functions of CWS are folded into the new Partnership Division. While we recognize that a pilot program like COBRA needs considerable flexibility, it nonetheless requires a minimum set of consistent planning criteria to evaluate where to work; what types of activities should be initiated and funded; and so on. Without this the FPCs are pretty much left to their own discretion on how to plan for project activities in their districts; and what types of planning units that they think are appropriate. The strategic planning document of January 1996 (CWS 1996) does not provide the kind of overall framework that will allow FPCs to know what kinds of mobilization efforts and activities that they should be emphasizing; what the overall CWS vision is for community-based conservation; and how the CWS priorities and lessons will be integrated with biodiversity goals (an especially important issue under the proposed KWS reorganization).

RECOMMENDATION: That CWS produce a strategic planning document that carefully lays out what their priorities are vis-a-vis the proposed Partnership Division; how field activities fit within this framework; and how the two-fold goal of improving local benefits and biodiversity conservation will be achieved under this strategy. This should be carried out in consultation with the Director/KWS and the Research and Planning Department (new Biodiversity Division), and input should be sought from the FPCs and District Wardens.

RECOMMENDATION: That CWS highlight their important educational and community mobilization accomplishments through the KWS newsletter. Without this kind of publicity, CWS and COBRA are unlikely to receive the kind of credit that they deserve for "jump-starting" the community-based program; nor are they likely to be well positioned under the planned reorganization of KWS.

2.1 The Role of Training

Training has played an important role in communicating the goals and objectives of the CWS program. In the first two years of the program much of the training was in the form of small seminars, workshops, and informal meetings. The cumulative effect of these efforts--although reports were only produced for a small number of them-- was positive with regard to educating KWS personnel in the goals and objectives of the CWS program. In terms of training for field-level staff, a modular course was designed and implemented during the summer of 1995. With the exception of

training in computer use and management information systems (most CWOs and Wardens do not have computers in the field), the curriculum for the modular course is appropriate for training CWOs in community-based development and resource management (CWS Training Programme 1995 and 1996).

Unfortunately, the effectiveness of the modular course was greatly diminished by scheduling it during June to August when CWOs and Wardens are heavily engaged in problem animal control and other activities. Because of its timing and its concentration in one prolonged period of about four months--rather than segmenting it into separate modules of 3 weeks each spread over the year as was originally envisioned in 1993 and 1994--many of the key CWOs and Wardens could not attend. This event indicates poor communication and coordination between headquarters and the field.

A curriculum for training local community members to serve as game scouts was designed by the training department at CWS, with the assistance of consultants and the Naivasha Wildlife Training Institute. The curriculum was designed with a sophisticated content that was well above an appropriate level for scouts. The FPCs, with the help of District Wardens and the FPC Coordinator, designed their own curriculum that was about 50 percent lower in cost, shorter in time, and more appropriate for the education and experience levels of scouts. Training sessions were held in Laikipia and Kajiado Districts and have been well received locally; about 50 percent of the trained scouts are now employed in their local communities. This is an important training achievement of COBRA, and it is the most direct training link to the communities outside of the protected areas.

It is clear that considerable tension exists between the training unit at CWS and the FPCs, and that the latter group tends to avoid any involvement with training that is initiated at headquarters. A large part of the problem lies with personality difficulties, but it is unfortunate that the linkage between CWS training and the field activities has been so weak.

RECOMMENDATION: That the modular course be held again this year at an appropriately scheduled time. It should be presented in separate modules of 3 weeks each at intervals of approximately 3 months. This will greatly assist in-service training, with minimal loss of productivity.

3. The Effects of COBRA Activities on Community Empowerment and Biodiversity Conservation

CWP has greatly improved the image of KWS in the focal districts; has raised the awareness of the value of wildlife to local communities; and has helped to mobilize communities in support of local conservation initiatives. These are important accomplishments that have occurred mainly within the past 15 months.

3.1 Organizing Local Organizations and Groups

The work of COBRA has contributed to the creation and strengthening of a range of local organizations and associations. They have achieved this through community mobilization efforts; providing legal assistance and--in some cases--funds to assist groups to register themselves either as self-help groups (under the Ministry of Culture and Social Services), associations (under the Societies Act), or companies (under the Companies Act); local meetings and seminars; and study tours. The legal office at KWS has assisted the different groups to assess which of the registration options they should pursue.

Already CWS has learned some important lessons about working with local organizations in conservation-related activities. At this point the FPCs are moving toward emphasizing ecosystem or regional associations and units, which better fit environmental realities and should reduce conflict between, for example, neighboring group ranches. This effort should be encouraged but it is not reflected in the planning efforts at CWS headquarters, which has eliminated Conservation Units (COSUs) from their strategic planning (CWS/COBRA 1995). Examples of organizations that have an explicit ecosystem dimension are the planned Leroghi/Kirisia Conservancy in Samburu District (which includes 25+ group ranches), the Wamba/Waso Conservancy (which includes about 10 group ranches) in Samburu District, and the Shimpole/OI Karimatian conservation association (which includes two group ranches) in Kajiado District. The advantage of working with these larger units is that they: (1) better approximate the social and ecological realities of the rangeland areas; (2) are more easily integrated with biological and natural resource areas; (3) can reduce competition for resources and funds among group ranches and locations; and (4) can provide a framework for planning community-based initiatives so that there is not an unnecessary replication of certain enterprises (for example, campsites and cultural bomas). In most cases, they will not be useful units for implementation of community-based activities, which will still remain with individual communities, group ranches, and self-help groups.

The group ranches have been an integral part of organizational support in the three focal areas of Samburu, Laikipia, and Kajiado. The strength and importance of group ranches does vary considerably in the different districts and this needs to be acknowledged. In some districts group ranches are active entities with strong resource management responsibilities and they hold committee elections on a regular basis (Shimpole Group Ranch, Kajiado District). In other areas this is not the case and the group ranch tends to be a "paper" ranch--represented on a demarcation map but having little influence on local management activities or decisions. In the Wamba/Waso Conservancy area very few of the group ranches have been formally registered by the land adjudication officer; and very few have elected group ranch committees. The majority of herders in the area do not know of the group ranch in which they are members. While it can be expected that CWS will have to assist with the formation of larger conservancy units, it is questionable whether or not RS/WDF funds should be used to help groups register themselves as group ranches solely for the purpose of community-based conservation. The adjudication of group ranches, which took place in Kajiado during the 1960 and 1970s, is an extremely political exercise that legally binds a group to a piece of land. I am not sure that CWS wants to be involved in this process or in the process of sub-division that has received some support from RS/WDF funds. The latter is arguably detrimental to the conservation goals of the COBRA program.

A deficiency in dealing with conservancy and other large units is that they tend to be dominated by political elites (mainly males) and other notables and, consequently, they are rarely representative of the majority of members in rural communities. They can be important for planning activities, but they are not appropriate for implementing community development initiatives. It is important that CWS-supported organizations not take on functions that are inconsistent with their scale and comparative advantage. Some of the larger coordinating associations--for example, the Association of Mount Kenya Operators (AMKO)--want to pursue community development initiatives, although they are clearly more of a professional/coordinating/lobbying association. A criticism that can be directed at COBRA and CWS is that in their "rush" to organize communities they have created unrealistic (and unsustainable) expectations of what RS/WDF funds can fund. In drafting proposals there is insufficient attention given to cost containment. Many of the larger associations that have received some support from CWS are submitting proposals for institutional support that often exceed several million shillings. The AMKO, for example, has a three-year proposal seeking support for constructing offices, hiring staff, purchasing vehicles, etc. that is in excess of US \$260,000. As a coordinating and planning body (like the Wamba/Waso Conservancy), these are amounts that are unsustainable and likely to further differentiate (and, perhaps, distance) the association from community-based groups in the region, whom they eventually will work with as partners.

3.2 Community Empowerment and Sustainability

There are important examples where COBRA has empowered the local community to engage in revenue-generating and conservation activities that are likely to be sustainable (this is discussed further in Section 5.1). Support for the KuriKuri group ranch, Mukogodo Division, Laikipia District is an example where the community is taking the initiative to establish strong commercial linkages with a tour operator who has signed a lease with the group and who is building a tented campsite in the area. This activity is likely to be sustainable because it is based on sound commercial practices and because CWS funds have not been used to subsidize the operation. In other cases, the level of funding, coverage of certain budget items, and the expectations of economic return are way out of line with market criteria, and have created unwarranted dependencies on CWS. At the coast, for example, even after a group of Boat Operators (at Shimoni) were provided in excess of KSH 700,000 for a revolving credit fund, they still expect the CWO to help them obtain spare parts from a distributor in Mombasa. A community cannot be empowered if it replaces one type of dependency linkage with another. As will be discussed later, the practice in some areas of utilizing RS/WDF funds to cover local salaries on enterprise projects also encourages strong and potentially disruptive dependency ties.

There has been a great deal of pressure to establish a field presence and to distribute funds to local groups. Because of the long delay in field implementation, there was an anticipated need to disburse funds and to implement projects (i.e., "acquire a field presence that shows funded activities"). In doing so, however, CWS may have created unrealistic expectations for funding among local groups--many of them in districts where other government departments have minimal development funds--and it now needs to think carefully about the sustainability of local projects and about establishing priorities for project funding. The lack of an overall planning strategy for ranking project

58

investments is noted by FPCs as a constraint to planning their activities; knowing what kinds of organizations and projects they should support; and assessing what are unrealistic levels of funding.

RECOMMENDATION: That COBRA review the different organizations that it has funded and decide on which best fit its community wildlife mandate. It needs to establish criteria on what kinds of organizations that it will support; the types of activities and budget items that it will support for different types of organizations (e.g., more attention to cost containment); and how it will determine if an organization is sustainable after RS/WDF funding is withdrawn. It is important that the composition, objectives, and sustainability of organizations be consistent with the conservation mandate of CWS.

3.3 Partnerships with NGOs and Other Agencies

An important dimension in the design of the pilot COBRA program was the establishment of strong linkages with the NGO community (both domestic and international) and with other actors in the private sector. In very few cases has this actually taken place. There is a clear and necessary role for local NGOs to be involved in conducting community work and in implementing the objectives of the CWP. Preference should be given to grassroots organizations, local associations, and NGOs proposed by the populations concerned. The field programs of CWS are at a stage of maturity where certain tasks--such as some community-level training and the management and implementation of social projects (e.g., water projects)--that CWS staff have been coordinating and implementing could be turned over to partner NGOs. It is simply not sustainable for CWS to be as heavily involved in the implementation of community projects, as it is now. While some justification for this in the initial stages was based on the lack of viable partners in some of the focal districts, the program is now at a point where many community-level tasks could be turned over to NGOs. It will be important, however, that CWS monitor and evaluate NGO performance and cost control and that it be totally transparent in its associations with NGOs and other partners. The question of partnerships with NGOs is discussed again in the section (5.1) on community capacity to respond effectively to RS/WDF incentives.

RECOMMENDATION: That all RS/WDF project proposals demonstrate a plan for working with partner organizations in the planning and implementation of social and enterprise development activities; and that they show how project functions will be transferred to non-CWS parties.

4. The Policy Context as It Relates to Community-Based Activities

Effective land use policies and planning are critical for the success of CWS initiatives, especially in areas where irrigated and dryland agriculture are encroaching on rangelands. At present the government of Kenya does not have an effective land use policy for mediating among competing interests and uses of land, including wildlife, pastoral and commercial livestock production, rainfed agriculture, and irrigated agriculture. Many of COBRA's field activities are in pastoral range lands held in trust by County Councils or in lands held by land holding companies (including the parastatal ADC), where agriculture is expanding at the expense of pastoralism and wildlife.

Ambiguities over land rights and settlement in these areas could constrain CWS activities, especially when lands can be alienated without the knowledge of the local community. The expansion of settlement and "squatter" activities in west Laikipia and the expansion of large-scale farming on the Leroghi plateau are examples where ambiguous land rights have resulted in changes in land use activities, and in the enclosure of former rangelands. KWS should encourage the government to undertake resource use planning in key areas of biodiversity and wildlife, and to develop policies that discourage (rather than encourage) these zones from being enclosed for agricultural production. It is the opinion of the evaluation team that the enclosure both of wildlife dispersal areas and strategic resources (e.g., wetlands) are the major threats to wildlife conservation in most parts of Kenya.

At a minimum the CWS field program has to have strong linkages with the Ministry of Agriculture and the District Development Committees (DDCs), the later who are charged with implementing the government's "district focus". COBRA has made an important start in initiating linkages with policy-making and technical bodies in the districts through inter-agency workshops held in Samburu and Laikipia Districts, but this needs to be followed up with dialogue to insure that program and policy initiatives of other agencies do not jeopardize COBRA activities.

In our field visits we found several examples where irrigated agriculture and settlement is being actively encouraged by government departments in pastoral zones that are important wildlife dispersal areas.

5. Benefit Sharing and Investments

The Revenue Sharing (RS) program was started in 1990 and was supplemented with income from the Wildlife for Development Fund (WDF) in 1994. Many RS projects were implemented in Kajiado District before WDF (and COBRA) were initiated; and many of these were not sufficiently linked to improved conservation. The early experiences with RS projects in the Amboseli/Tsavo areas, for example, highlight the difficulties of revenue sharing when it is not tied to improved conservation, but rather is perceived by communities as an entitlement for having wildlife on their lands. A system of entitlements for communities, including bursary disbursements, simply is not sustainable by KWS under current budget realities. An effort should be made in these areas for allowing communities to perceive of the new RS/WDF funds as a mechanism for generating benefits from improved conservation, rather than as compensation for tolerating wildlife on their lands.

5.1 Revenue Sharing (RS)/Wildlife Development Funds (WDF) and the Capacities of Local Communities to Respond to their Guidelines

The combined RS/WDF fund is the main vehicle available for supporting community development and local conservation initiatives. The guidelines for Revenue-Sharing (now called "benefit-sharing") and the Wildlife for Development Fund have been revised several times since 1994, with the latest revisions taking place in January 1996. As they are written now, the guidelines encourage proposals for income-generating activities; proposals from legally-registered groups (self-help groups, societies, companies, etc.); and proposals that are completely transparent in how funds and benefits will be

allocated. It is important that: (1) the presence of these funds not be the main reason for the formation and registration of groups, associations, etc; (2) the guidelines and proposal requirements not encourage submissions only from large groups with large requests for funding (KSH 5 million or more); and (3) KWS help to insure that partnerships with community groups and commercial interests not result in inequitable allocations of risks and benefits (i.e., the community loses out to outside commercial interests). While the guidelines for RS/WDF proposals acknowledge the effect that funding availability may have on the formation of an organization and they try to screen against this, there are many examples where an association was formed to pursue RS/WDF funds. This raises another strong concern about the sustainability of any initiative that is proposed solely because funds are available.

It is recognized that the FPCs and District Wardens must play an active role in helping community groups complete and fill out proposal applications. With this in mind, the application form does not discriminate against smaller groups, but at this point it does require strong involvement of the FPSc in preparing it. The Lorubae Curio (which includes about 80 women of the Lorubae Women's Group) is an example of a project that was submitted and funded (for KSH 250,000) by a small, low income group. This group includes elderly widows, drought relocatees (famine victims), and other extremely poor individuals who have organized a curio shop to sell to tourists visiting the Samburu National Reserve. The group was already in business prior to the CWS program, but the availability of RS/WDF funds allowed them to improve the management and physical facility of the shop, and to diversify the kinds of items that they sell.

An important reason why the FPCs have been so heavily involved in the design and implementation of RS/WDF projects is the lack of community capacity for planning and implementing local enterprise and social programs. The guidelines for the RS/WDF require skills in proposal preparation and project planning that are not readily available in many all parts of rural Kenya. However, as noted earlier, the heavy involvement of CWS and COBRA in all stages of project formulation is unsustainable. What COBRA should do to help build community capacity in project planning and management is to actively broker partnerships with local NGOs and appropriate private-sector firms. The involvement of such groups as the SDDP in Samburu District and the ASAL Programme in Laikipia, who already have experience in working with local NGOs and community-capacity building, should be sought. Simple project management training efforts for community personnel have been carried out by NGOs in Samburu (with support from SDDP) and in Kajiado Districts (with support from the ASAL programme) and linkages with these NGOs should be sought. As a cautionary note, it should be recognized that capacity building at the community level is a time-consuming, lengthy process and COBRA's goals should be to help initiate the process, and where appropriate, strengthen existing capacities.

As CWS and COBRA increasingly move toward supporting local enterprise projects, it is important that viable private-sector partners actively be sought. Ideally private investors should be sought for all enterprise investments, and that COBRA (with the use of WDF funds) should provide only seed money for the establishment of pilot enterprise projects. While it is acknowledged that WDF funds may have to subsidize enterprise projects in the early stages of development, these should be replaced in favor of private investment and commercial loans as communities and potential partners gain

confidence and experience. At present CWS is not doing enough to find partners to assist with the marketing, investment, and management requirements of enterprise projects, and to assist with the training of community personnel in the management of enterprise activities. NGOs and other private actors should be sought to assist with enterprise advising, marketing, and other business activities especially related to small-scale tourist investments (e.g., cultural bomas, camping sites, and sanctuaries). Some preliminary work along these lines has been initiated in Samburu District with an NGO from Meru District. There are a plethora of private organizations in Kenya which have experience in developing small-scale enterprises, and some of these should be involved with COBRA activities.

The criteria for selection of RS/WDF projects addresses several factors. These include: (1) the importance of the area to conservation; (2) the sustainability of the activity; (3) the group's location vis-a-vis a national park or reserve; (4) the degree to which the group is organized; (5) the degree to which the group suffers hardship from wildlife; (6) the replicability of the activity in other areas; (7) the size and economic status of the group; and (8) other special factors affecting conservation. Many of these criteria are difficult to measure objectively and will be subject to the interpretation of the FPC and the review committee. Virtually no consideration is given to how many beneficiaries are likely to benefit from the project, although this information is requested by CWS on the application form that must accompany all proposal submissions. For proposals up to KSH 1 million approval is only needed at the AD-CWS level; for larger proposals the KWS Board must approve the projects.

Other than these general criteria no other indicators are provided as guidance in solicitation of local projects. There are virtually no criteria at CWS for the kinds of projects; the kinds of budget items; and the scale of activities that can be covered by RS/WDF funds. Because of this shortcoming, one finds vastly different levels of funding going to similar projects in different districts. For example, a water project in Samburu might cost Ksh 500,000 but be proposed for Ksh 700,000 in another district. The cost of school projects also varies widely among the different districts. There also is no clear understanding of what budget items should be covered under RS/WDF funding. For example, local salaries for water attendants, game scouts, etc, are frequently covered by RS/WDF funds in Kajiado District but not in other districts. Should there be a clear policy on whether RS/WDF funds can be used to cover salaries for certain types of workers and for how long? Most community development specialists would agree that covering the costs of local salaries on a community development initiative is an extremely problematic precedence, and one which may cause local resentment when it is halted. It is simply bad policy if one is trying to empower local communities. The FPCs and District Wardens have no clear guidelines on this or on other types of activities.

The lack of consistency in levels of funding for similar types of projects; for the coverage of certain budget items; and for the funding of particular activities in certain districts (for example, the funding of school bursaries in Kajiado District) should be rectified by KWS and CWS management, in consultation with others. Regarding the latter, most of these activities initially were funded out of RS funds before there were general guidelines. What is needed now are a set of priorities and guidelines to guide the FPCs when they are working with the communities on their proposals. Without guidelines communities can be misled into pursuing larger than usual requests for funding; and request funds for budget items that are inappropriate and that in the medium-to-long term could

jeopardize the sustainability of the activity. The lack of guidelines also makes it difficult to account for funding allocations by line item. Once again, COBRA needs to give more thought to what kinds of costs and activities are consistent with the principles of local conservation and sustainability. FPCs have an inordinate degree of freedom in developing WDF projects according to their own criteria.

At this point CWS should insist that all assistance to communities has a clear link to and justification in terms of conservation. Social projects, such as schools and water points, can continue to be funded but there must be a "quid pro quo" involving verifiable changes in conservation behavior. This requirement, for example, might include no expansion of irrigated agriculture in key wildlife areas, the development of conservation sanctuaries, and/or conservation education for children. In short, for all RS/WDF projects communities must be then CWS has to have access to biological data and a planning framework that allows it to relate improvements in socioeconomic status to improvements in conservation and wildlife management. Without being able to make this link, the project is left with anecdotal observations about changes in management and conservation practices that may have some validity but are unlikely to hold up to careful scrutiny.

There are important ecological monitoring indicators that should be monitored by other units within KWS (e.g., the Research and Planning Unit), but there is at least one CWS indicator on land use that should be followed. This is the expansion of agriculture in the important wildlife dispersal areas of each of the focal districts. This indicator has been identified by the M&E Unit and efforts will be made to monitor changes in this indicator--although it is unclear how they will do this (see M&E 1996). To do this, however, some collaboration with other KWS units is prudent, especially the Biodiversity Unit. Ecological data and its management, of course, should be housed elsewhere within KWS. In the case of Samburu and Laikipia districts there already exists considerable physical data and GIS data sets. The GTZ-funded range management handbook for Samburu provides a wealth of data on vegetation, land use, and water sources.

At present the biodiversity importance of selected RS/WDF project sites are based on the intuition and practical experiences of field staff--rather than on sound biological information. In Samburu and Laikipia Districts planning units are based on assumed elephant migration routes and other wildlife indicators. The M&E Unit should work with Research and Planning/Biodiversity and the KWS Elephant Programme to confirm or (revise) the FPC's own notions of what are the important dispersal areas. USAID also might wish to request USAID/REDSO to provide a range ecologist on an intermittent basis to help the M&E Unit. Some assessment should be made of which biodiversity indicators (elephants, other species?) should be used to define planning units; the Biodiversity unit should be encouraged to undertake applied research in focal areas where CWS/COBRA are working.

Currently KWS plans to do interdisciplinary data collection and monitoring in selected ecosystems of Kenya under its newly established Biodiversity Unit. CWS should inquire about the possibility of using 1-2 of its focal areas as pilot locations for the unit's monitoring work. It has been emphasized that they want to simultaneously monitor the biological, economic, and social processes of biodiversity conservation. In addition to Samburu, Laikipia (under the Laikipia Research Programme-LRP) also has very rich physical data sets that are on GIS, and could be easily utilized. Unlike the Samburu program, the LRP is still gathering data and would most likely be willing to collaborate with

CWS/KWS. Both of these districts would make excellent locations for KWS to monitor biodiversity.

RECOMMENDATION: That the M&E Unit within CWS establish immediate collaborative linkages with the Biodiversity (Research and Planning) unit and that where necessary project resources be used to allow their staff to confirm the ecological utility of CWS planning units in the focal areas. That a system be put in place that will allow the M&E unit to work with the Biodiversity Unit.

RECOMMENDATION: That an assessment be conducted of where the M&E Unit should be placed within KWS, and of the utility of having an integrated M&E Unit (with personnel from Biodiversity, CWS, and other units).

64

References Cited

- Barrow, E.P. Lembuya, P. Ntiati, and D. Sumba
1995 Knowledge, Attitudes and Practices Concerning Community Conservation in The Group Ranches Around Amboseli National Park. Nairobi: African Wildlife Foundation.
- COBRA/CWS
1995 Conservation of Biodiverse Resource Areas Project: Work Plan and Budget, 1 July 1995-30 June 1996
- CWS/Samburu District
1995 Samburu Focal Area: Community Wildlife Programme: USAID Mid-Term Review. Maralal, Kenya.
- CWS Training Programme
1995 Community Wildlife Management: Course Outline. Nairobi: KWS.
- CWS Training Programme
1996 Community Wildlife Management: Course Outline. Nairobi: KWS.
- Edgerton University
1995 A Report of the Workshop to Review PRA Training for Kenya Wildlife Service Staff. PRA Programme, Edgerton University, Njoro.
- Girgir Group Ranch
1995 Umoja Waso Women Group: Samburu Cultural Centre. Archer's Post, Kenya.
- Lambert, Virginia
1995 Monitoring and Evaluation Plan: COBRA. Nairobi: KWS/CWS.
- Metcalf, Simon
1994 The Zimbabwe Communal Areas Management Programme for Indigenous Resources (CAMPFIRE). In D. Western, R. M. Wright, and S. Strum, eds. Natural Connections: Perspectives in Community-Based Conservation. Pp. 161-192. Washington, DC: Island Press.
- Monitoring and Evaluation (M&E) Unit
1995 Monitoring and Evaluation Unit: Status Report. Nairobi: KWS/CWS.
- Monitoring and Evaluation (M&E) Unit
1995 Field Trip to Kajiado District: 17th-20th, and 25th May. Nairobi: KWS/CWS.
- Mwadzaya, H., M. Ndung'u, and D. Sumba

1995 Knowledge, Attitudes and Practices Concerning Community Conservation in the Areas That Neighbour the Kisite/Mpunguti Marine Park and Reserve. Nairobi: CWS/COBRA.

Smith, R. and M. Ombai

1993 Management Plans for Conservation Units. Nairobi: CWS/COBRA.

Tropical Research and Development, Inc.

1993 Midterm Evaluation of the Botswana Natural Resources Management Project.
Washington, DC: USAID.

66

ANNEX 3

Cobra Mid-Term Evaluation

Assessment of Ecological and Natural Resources Aspects of Project Implementation

1.0 Context

The USAID mission to Kenya approved funding for the Conservation of Biodiverse Resource Areas (COBRA) project in September 1991. The project was to take primary responsibility for the implementation of KWS's Community Wildlife Program (CWP).

Project implementation started in January 1993. Late that year, the then-Director of KWS resigned under a barrage of accusations and a strained relationship with government authority. KWS was virtually shut down for six months until mid-1994.

In November 1994 the current Community Wildlife Service (CWS) Assistant Director (AD) was appointed, and in December 1994 the current COBRA chief of party (COP) arrived in Kenya. Thus, for all practical purposes, the COBRA project has been in normal operation for approximately one year.

The COBRA project is being implemented amidst a lively debate over the future of biodiversity conservation in Kenya. Recent analysis of existing wildlife data collected by the Department of Resource Survey and Remote Sensing (DRSRS) revealed that wildlife numbers have declined by 35% between 1977 and 1994, in spite of the hunting ban imposed in 1977 by then President Jomo Kenyatta. A recent review of human-wildlife conflicts underscored the severity of the threat to wildlife conservation outside protected areas.

The most controversial feature of the current debate over wildlife conservation is centered on the liberalization of consumptive utilization. KWS's position in this debate is for a cautious easing of the hunting and culling bans. The institution recognizes that this can only be accomplished with the assistance of communities and individuals that interact with wildlife outside protected areas. Thus, KWS sees the CWS as a key component of its current and future wildlife conservation strategy. COBRA finds itself playing a key and timely role in the future of wildlife conservation in Kenya.

2.0 Purpose of the Evaluation

This section of the evaluation report assesses the performance of the COBRA project from the standpoint of wildlife and habitat conservation in the focal areas. Specifically, this assessment addresses the following questions and topics:

1. The success of the COBRA project hinges on the veracity of its design hypothesis: that increasing the stream of benefits that flow from wildlife conservation to communities will change the attitude

- of rural communities towards wildlife conservation from negative to positive. Are there indications that this hypothesis is valid?
2. The ecological adequacy of community conservation units. Are group ranches viable conservation units?
 3. Review the community game sanctuaries. What are the likely impact of game sanctuaries on the availability of grazing for the communities?
 4. Assess the viability of the project focal area as ecological units. To what extent do focal areas constitute a viable biodiversity conservation unit? How big should a focal area be for the project to have an impact on wildlife conservation? What should be the way forward?
 5. What has been the physical achievements of the project on conservation of biodiversity?
 6. Assess the quality of the technical aspects of the wildlife utilization study commissioned by USAID. Are the conclusions reached valid?
 7. Assess the relevancy of KWS's research program to community-based conservation of biodiversity. To what extent does the research program generate knowledge that is useful for community-based conservation activities?
 8. Review CWS's environmental procedures. Do environmental reviews satisfy USAID's regulations? Are the findings of environmental reviews respected or are EIAs undertaken solely to satisfy environmental requirements of donors?
 9. Evaluate monitoring efforts. Is monitoring of CWS's activities and impacts sufficient to derive maximum benefit from lessons learned and quantify project-induced changes?

2.0 Wildlife and Biodiversity Conservation

2.1 Impact on the Resource Base

2.1.1. Changing attitudes: support for the design hypothesis.

- *CWS has succeeded in changing the way communities view wildlife by raising awareness as to the tangible value of this resource. In doing so, CWS has provided tentative support to COBRA's design hypothesis. Communities clearly link community development activities to wildlife conservation. Only time will tell whether this change in attitude will translate into a change in conservation behavior.*

The hypothesis upon which the project design was based is that: *increasing the stream of benefits that flow from wildlife conservation to communities will change the behavior of rural inhabitants towards wildlife conservation from antagonistic to sympathetic.* During our tour of project sites, we met with ample evidence to support it. On several occasions we were told by members of various communities

that they now viewed wildlife as useful and worthy of conservation. They attribute the change in attitude to the Community Wildlife Service's (CWS) --COBRA's implementing arm within KWS-- awareness raising efforts and community development projects. We were left with a very clear impression that communities link village development activities directly to wildlife. This attests to the value of this category of activities to community-based conservation.

2.1.2. Group ranch associations, fora and conservancies: better communication, larger areas, and more effective lobbying

- *CWS/COBRA has been very effective in promoting the creation of group ranch associations, fora and conservancies. These groups may be used to increase the effective area of units that may be managed for wildlife and biodiversity conservation, and in some cases serve as a deterrent to subdivision and fencing. Greater lobbying power will diminish the chances that key wildlife resources are usurped. The ultimate effectiveness of this strategy is yet to manifest itself but future benefits to conservation may be great. The creation of community-managed game sanctuaries has contributed significantly to the conservation of biodiversity in Kenya, and is a strong indication of the approach's potential. Possible pitfalls are discussed elsewhere (Little, this report). We recommend that CWS continue to contribute to the organization of conservation groups. This practice is in accordance with KWS's current policy.*

COBRA, through CWS, has dedicated a considerable effort to the formation of group ranch associations, the registration of wildlife fora, and conservancies. To accomplish this, CWS holds workshops and organizes meetings that bring the different parties together. These gatherings serve to raise the awareness of communities *vis-à-vis* wildlife conservation. CWS also provides legal advice and services, and occasionally pays for the registration fees for the organizations with funds from the Wildlife for Development Fund (WDF). Although the degree of involvement of CWS in the creation of these bodies varies and is not always acknowledged, individuals interviewed maintained that the institution played a key role in the formation of the Amboseli-Tsavo wildlife Conservation Association, the Wamba-Waso Conservancy in Samburu, the Golini-Mwaluganje Community Conservation Ltd., the Mombassa Boat Operators Association, and the Shimoni Private Boat Operators Association, amongst others.

These wildlife conservation organizations may come to play an important role in the conservation of Kenya's wildlife resources for at least three reasons. First, the amalgamation of groups of people that have influence over the management of land resources increases the size of areas that may be placed under integrated natural resource management schemes. For example, in providing legal advice, holding workshops and mobilizing the local population, CWS played a key role in the registration of the Mwaluganje-Golini Community Conservation Ltd., a community-managed enterprise with 180 shareholders. This company is now responsible for the management of an elephant sanctuary on community-controlled land that forms a crucial link between two protected areas; Shimba Hills National Park and the Golini Forest Reserve. According to estimates of local KWS personnel, these two protected areas host between 400 and 600 elephants. The company has plans to re-introduce animal species that were once part of the ecosystem but disappeared due to human pressure. Prior to the creation of the company, wildlife-human conflicts triggered calls by the community to exterminate up to 250 male elephants. The role that CWS/COBRA played in the creation of the Mwaluganje-

Golini sanctuary must be viewed as a very important contribution to biodiversity in Kenya. The model has potential for application elsewhere in Africa.

Second, these groups/associations may serve as linkages between CWS and communities. Enlightened group leaders may promote and convey to communities KWS's message *vis-à-vis* biodiversity conservation. For example, the Amboseli-Tsavo Wildlife Conservation Association is actively opposing the sub-division of member group ranches.

Third, as representatives of large numbers of people, these organizations may serve to protect the interests of communities as they pertain to wildlife conservation. This is particularly important with respect to the conservation of water, a resource that is facing increased pressure in semi-arid areas due to the spread of irrigated agriculture.

The advantages of group organization notwithstanding, these institutions may give rise to unexpected and undesirable results. These pitfalls are discussed elsewhere in this report.

3.0 The Limitations of Project Focal Areas: The need for a strategic re-orientation.

3.1 The ecological limitations of using Districts as a basis for planning CWS's activities.

- *The COBRA project operates in four focal areas. Three of these correspond to the Districts of Samburu, Laikipia, and Kajiado. The focal area concept stems from the need to concentrate resources and effort. The approach suffers from two weaknesses: 1) districts seldom encompass entire ecosystems; and conversely 2) not all areas within a district are part of important -from a biodiversity viewpoint- ecosystems. These limitations suggest that COBRA should focus its activities on an ecosystem level basis. A movement in this direction has been initiated by the Samburu Focal Area Coordinator. Unfortunately, the lack of a clear biological and social set of criteria to prioritize interventions, and the large area encompassed by migration-delimited ecosystems threaten the effectiveness of the program. A solution to this dilemma is outlined below.*

The COBRA project operates in four focal areas. These correspond to the Districts of Samburu, Laikipia, Kajiado and the Coast Region (Kwale/Mombassa). The focal area concept stems from the need to concentrate resources and effort.

While expedient from institutional and administrative viewpoints, the use of districts as a unit around which to plan community conservation activities suffers from serious ecological deficiencies. First, district and ecosystem boundaries seldom coincide. Thus, activities in one district aimed at conserving migratory species may be negated by developments in neighboring districts.

Second, not all areas within districts are important from the standpoint of wildlife conservation. This being the case, and in light of the relatively large expanses covered by districts, and the lack of a clear methodology for identifying key biodiversity areas and processes, a district approach may not lead to effective targeting of resources and efforts. In this context, the CWP tends to respond to crisis. Thus, we see a field program that is largely reactive instead of proactive. To some extent,

this leads to independent crisis abating field activities, such as problem animal control, that are of limited relevance to the long-term conservation of biodiversity in Kenya.

In light of the above, we recommend that COBRA change its approach from focal districts to focal ecosystems. This strategy is being attempted by the Samburu District Field Program Coordinator. However, in the absence of reliable knowledge that would permit a reasonable delimitation of ecosystem boundaries, and the identification of key resources within it, there is little basis by which to focus resources inside an area that is even larger than that of the original focal district. Therefore, his good intentions and reasonable approach are negated by the magnitude of the task. As we suggest below, the shift from a district approach to an ecosystem approach to conservation planning requires close integration between CWS and other divisions/departments/programs within KWS such as the future Biodiversity Division and the Elephant Program.

3.2 Closer integration between KWS's research units/departments and CWS is necessary for the shift from district level to ecosystem level planning.

- *KWS's current research program contributes little to CWS's activities. With the exception of work being conducted in the Amboseli ecosystem, the program is composed largely of independent research projects without a clear linkage to KWS's CWP. In the absence of reliable knowledge about the ecosystems they are supposed to conserve, Field Program Coordinators are left without a basis on which to prioritize activities and focus resources. A task force should be set-up in order to identify ways in which CWS's research needs are incorporated into KWS's research program. In the meantime, it is necessary that a review of existing ecological studies be conducted, to insure that the best available ecological knowledge is used in targeting CWS's field activities at the ecosystem level.*

Kenya's protected area system does a reasonable job of protecting representative assemblages of the country's biodiversity. However, unless the processes that link these protected areas to the remainder of the ecosystems of which they are a part are preserved, they will become little more than ecosystem fragments that require intensive management; outdoor zoos, so to speak. There will be no flow of genetic material from fragment to fragment, and wildlife populations will be unable to respond to climatic vagaries by accessing key resource patches. In fact, this process has already negatively affected Amboseli National Park, where a forthcoming habitat rehabilitation program is soon to commence with the goal of restoring some of the park's biodiversity.

Outdoor zoos with African species do not need to be situated in Africa. They may be created virtually anywhere, climate and economics permitting. Kenya's attractiveness as a wildlife haven is likely to suffer, unless the processes that allow ecosystems to persist are conserved.

Ecosystems delimited by migratory movements of large-bodied wildlife species cover vast expanses. This is particularly true of semi-arid areas where climatic uncertainty forces animals to range widely in search of critical resources. Within these dispersal areas there are particular migration routes and key resource patches that are crucial for the conservation of biodiversity within these ecosystems. In order to effectively conserve biodiversity in Kenya, the CWS needs to focus its resources on the conservation of key ecosystems processes and key resource patches. This can only be accomplished with reliable knowledge about the ecosystems to be conserved. For example, the identification of

migratory routes and key resources patches would allow CWS to identify land areas that must remain unimpeded, and critical resources over which conflicts between wildlife and humans may develop. This would allow CWS to become proactive instead of continually reacting to human-wildlife conflicts as they emerge.

It is therefore imperative that CWS be involved in the development of KWS's research strategy. KWS's Elephant Program and its Research and Planning Department, soon to be renamed the Biodiversity Division, must cater to the extent possible to CWS's needs. Currently, KWS's research program consists of independent research projects with little linkage to an overall conservation strategy. There is no evidence, apart from the special case of Amboseli and its surroundings, that scientific knowledge is being used to increase the effectiveness of the community wildlife program. Have twenty years of research on elephant behavior in Amboseli produced no knowledge that may be used in reducing the number and intensity of conflicts between humans and pachyderms?

A switch in research strategy and the creation of new knowledge takes time. The situation in the semi-arid areas of Kenya is critical and time is not on the side of biodiversity conservation. Therefore, it is necessary that an inventory of the existing knowledge base be undertaken, and that this knowledge be considered in the development of CWS's strategy. This would go along way towards assisting the Field program Representatives to better focus resources and efforts for maximum conservation benefits.

3.3 An ecologically sound community-based conservation strategy may be used as the basis for inter-sectoral discussions on the development of a holistic approach to conservation.

- *One major impediment to biodiversity conservation outside protected areas is the lack of inter-sectoral cooperation. Ministries develop and implement programs along sectoral lines without sufficient consideration of cross-sectoral effects. This results in intractable conflicts. In the absence of a clear understanding of what resources/areas are crucial to the conservation of wildlife, community conservation agents are unable to articulate arguments for an integrated approach to rural development that caters jointly for the needs of wildlife and humans. It is recommended, therefore, that CWS in close cooperation with the RPD (Biodiversity Division), and other partners in the conservation and rural development arena, identify areas, resources, and processes that are crucial to the conservation of wildlife. This knowledge can be used as the basis for negotiations and integrated management planning involving KWS and other NRM/E development partners.*

Biodiversity conservation entails the conservation of ecosystems. This requires close inter-sectoral collaboration between ministries and other institutions that have a stake in natural resources management. Independent actions on the part of one ministry is likely to negate the efforts of another. Thus, the location of irrigation schemes in key biodiversity areas by the Ministry of Agriculture would negate the attempts of CWS to reduce human-wildlife conflicts and conserve the country's biodiversity.

The development of district level natural resources management plans is well beyond KWS's mandate. However, a biodiversity strategy that is grounded on ecological understanding may provide the tools to assist district level CWS personnel to seek mutually beneficial compromises with other

rural development actors. For example, knowledge of the importance of a given area for elephant breeding may be used to convince a County Council not to lease trust land in that particular location for large scale wheat farming. In the absence of this understanding, district-level KWS/CWS personnel are left without a solid platform from which to make the case for conservation, while offering alternative solutions to conflicts over the use of resources.

The development of an ecologically grounded conservation strategy cannot be accomplished by CWS on its own. This is an exercise that would entail collaboration with KWS's RPD and other conservation and rural development actors. The strategy should identify the key resources, areas, and processes that are crucial for biodiversity conservation. It must also identify those ecosystem components that are biologically important for conservation but, given Kenya's socio-economic position, no longer salvageable. It is a difficult and time consuming exercise but it has to be done for KWS's biodiversity efforts to be sustainable.

4.0 CWS's Environmental Review Procedures

4.1 CWS's environmental procedures do not meet donor requirements.

- *CWS and KWS have limited capability to undertake Environmental Impact Assessments (EIAs). There are no institutionalized procedures to determine whether an EIA should be conducted. A few projects have been funded by the Wildlife for Development Fund that, according to USAID regulations, would have required at least an Initial Environmental Evaluation (IEE). These may easily be undertaken by CWS's EIA unit, provided the unit is given adequate support in terms of transport and computer equipment. Currently, EIAs undertaken by the unit take an inordinate amount of time. It is recommended that the CWS EIA officer be introduced to USAID's Environmental Procedures as outlined in the Agency's Regulation 216, and that these be used to determine the level of environmental review required for WDF-funded activities. The CWS's EIA procedures should be institutionalized, and COBRA should avail the resources necessary to facilitate the undertaking of IEEs by the CWS's EIA unit. The EIA unit should not attempt to undertake full-fledged EIAs on its own as it does not possess the necessary resources to do so. Rather, it should oversee the undertaking of these efforts by outside contractors, ensure their quality and compliance with recommended actions.*

CWS's Environmental Impact Assessment (EIA) unit is manned by one individual with an M.Sc. degree. There is little doubt that he has the capacity to undertake environmental reviews of simple projects and to coordinate the undertaking of more complex evaluations. Nonetheless, the performance of the EIA unit falls short of that required for USAID-funded activities as outlined in the Agency's Regulation 216.

One of the impediments to the appropriate functioning of the EIA unit is that environmental review procedures are not institutionalized within KWS. There is no clear criteria established to determine if an EIA is required or not. In addition, the EIA unit does not have access to the resources it needs to undertake prompt environmental reviews of proposed projects. The EIA officer has to rely on public transport to get to the district headquarters, and has to limit field visits to those periods when vehicles are made available. The unit is also devoid of a computer. As a result, EIAs that should take a few

weeks end up taking a few months to complete. Thus, of 10 requests the EIA unit has received to undertake assessments, only two have been completed to date.

The EIA produced by the CWS EIA unit for the *Kimana Wildlife Sanctuary* was reviewed to assess the adequacy of the environmental review. The report reflects the fact that it was produced by the EIA officer with little assistance from other specialists, a limitation that manifests itself in the inadequate coverage of some important issues such as effluent and waste disposal. This observation, however, should not be construed as a criticism of the EIA officer. It is simply the consequence of assigning one individual to undertake a task that would have required a multidisciplinary team composed of 3 to 6 individuals.

It is therefore imperative that environmental review procedures be institutionalized within CWS; that a clear procedure be established to determine when CWP activities require EIAs; and criteria established to determine whether environmental reviews are to be conducted with in-house resources or contracted expertise. It is also important that the COBRA project avail the necessary support to facilitate the work of the EIA unit. With respect to USAID-funded activities, it is necessary that CWS follow USAID's guidelines for conducting environmental reviews. These are outlined in the Agency's Regulation 216, and are intelligible to any individual conversant with environmental review procedures. Regulation 216 specifies what categories of activities need to be subjected to environmental review and identifies those that do not. This regulation, with some modifications, may serve as the basis for the institutionalization of environmental review procedures within KWS. Given the limited resources of the EIA unit, it is recommended that it confine itself to determining the level of environmental review required, conducting initial environmental evaluations, and overseeing full-fledged EIAs conducted by contractors. Occasionally, EIA unit staff should participate as a team member in EIAs in order to stay up to date on the latest thinking and techniques.

Finally, it appears that EIAs are largely conducted to meet donor requirements. The EIA unit should insure that mitigation requirements contained within EIAs are implemented.

4.2 On the requirement that all WDF-funded activities be subjected to an EIA.

- *WDF guidelines call for all activities over KSh100,000 to be subjected to EIAs. This is unnecessary and will compromise the effectiveness of the COBRA project. Once again, USAID's Regulation 216 may provide guidelines as to when EIAs should be required and when they should not. The EIA officer should be required to review WDF proposals to make this determination.*

WDF-funded activities range from capacity building to fence construction. Some have serious environmental ramifications while others do not.

As currently written, KWS's *Policy Statement and Operational Summary for Benefit-Sharing and the Wildlife for Development Fund* states that all activities over KSh100,000 must be subjected to an EIA. This is unreasonable and will prove a major deterrent to the effective implementation of CWS's field activities. It is therefore necessary for KWS to establish a procedure by which activities that do not have significant impacts on the environment may be categorically excluded from environmental review requirements.

USAID's Regulation 216 provides detailed guidelines to determine the level of environmental review different categories of activities must be subjected to. CWS's Environmental Officer could utilize these regulations to screen activities that need full-fledged EIAs, from those that may little or no environmental review.

5.0 Monitoring of Project Impact

5.1 *No systematic collection, analysis, and diffusion of data.*

- *Current monitoring efforts are insufficient to detect impacts of project activities on the resource base, or changes in perception of rural communities towards wildlife. Data collection and analysis have yet to become systematic. It is therefore necessary that a system of data collection, analysis and distribution be institutionalized as soon as possible. It is particularly important that information flows systematically and routinely from CWS's activities in the field, and other relevant departments and programs to CWS's monitoring unit. It may also be desirable to combine CWS's monitoring with KWS's overall monitoring unit. Detailed recommendations as to how to upgrade CWS's monitoring unit and procedures are beyond the scope of this evaluation. COBRA/CWS should consider recruiting, on a short-term basis, a monitoring and evaluation specialist to develop a detailed and practical system to enhance the performance of CWS's monitoring unit.*

The CWS's Monitoring and Evaluation unit maintains four data bases: 1) training; 2) wildlife utilization; 3) problem animal management; 4) WDF-funded activities. The unit maintains no data base that is explicitly linked to measuring the impact of CWS/COBRA activities on conservation. There is no systematic collection or analysis of biophysical data, nor are attitudinal changes of communities towards wildlife being systematically monitored. Data on problem animal management may be used to detect changes in the incidence of conflicts, but say little or nothing about the status of conservation. With the exception of Shimoni, Amboseli, and Tsavo, there is no baseline data on community attitudes towards conservation (see Little , this report).

Currently there are few data sources that CWS can tap in order to gauge the effects of the CWP on conservation. One possible source, is data on the incidence of poaching, and community reporting of poaching activities kept by KWS's Security Department. Apparently, CWS' monitoring unit does not have regular access to this information source.

A second important data source pertains to existing data on biophysical resources of the Amboseli Basin. For nearly two decades, WCI has systematically monitored animal numbers and changes in land use in the area. This second data source, together with the baseline data on community attitudes towards conservation gathered at the outset of the CWP, provides an opportunity for detecting project impact in an area where CWS has been active for over two years. Unfortunately, the Amboseli region serves as the stage for a myriad of conservation and development actors. This makes it nearly impossible to attribute changes in conservation behavior of communities to CWS's activities.

Given the lack of baseline data and the difficulty in collecting and interpreting data on biophysical indicators, CWS is faced with a difficult task to assess degree of impact. The monitoring unit is

therefore left primarily with proxy indicators of conservation. These include: 1) changes in the incidence of poaching in target areas; 2) number of poachers apprehended due to community efforts; 3) attitudinal changes of people towards wildlife; and 4) number of people active in conservation associations. Two direct indicators of conservation behavior would be : 1) changes in the rate of land sub-division; 2) changes in the amount of land set aside by communities for conservation purposes.

Perhaps the ongoing Land-Use study commissioned by COBRA will provide sufficient baseline data to enable the project to detect changes in land use practices that may have taken place in the focal areas at the end of the project period. If not, the DRSRS should be commissioned to undertake an analysis of existing data on land use within selected portions of focal areas to establish a baseline upon which project impact on conservation behavior can be assessed.

Currently neither CWS or KWS has the capacity to collect and analyze data that will permit monitoring and evaluation of the effects of the Community Wildlife Program on the resource base. Animal counts are conducted on a case-by-case basis and, with few exceptions, little information is gathered on changes in land-use.

In recognition of this limitation, KWS has signed a Memorandum of Understanding with the Department of Resource Survey and Remote Sensing (DRSRS) which outlines in broad terms the relationship between the two institutions. This document needs to be complemented by a contractual arrangement between KWS and DRSRS that specifies areas, parameters to be measured, mode and interval of data collection and analysis.

Finally, it is necessary that monitoring and evaluation become an integral part of field activities. It is also necessary for CWS to undertake a survey of data sources from within KWS that may be used to complement its monitoring activities. On the other hand, KWS must establish a system to insure that CWS's monitoring unit receives data from other departments/divisions of KWS on a systematic basis.

We are aware that the general recommendations outlined above do not provide adequate guidance for improved monitoring and evaluation of the impact of CWS/KWS activities on the resource base. This is a task that calls for the services of a very experienced monitoring and evaluation specialist with a strong background in environmental/natural resources monitoring. A previous consultancy commissioned by DAI did not provide adequate guidance on how to monitor CWS's impact on the natural resource base. Therefore, we recommend that COBRA immediately recruits the services of a monitoring and evaluation specialist for a period of at least one month, to develop a monitoring and evaluation system that will detect the impact of CWS's activities on the resource base it is attempting to conserve. This individual should identify available sources of data, gaps in information, and ways to fill these gaps. He should also establish a procedure to insure that data flows systematically from the sources to the monitoring unit, and assist the CWS staff in developing a useful reporting procedure. The consultant should also identify what tasks should be performed by CWS/KWS and what tasks should be contracted out. The system he/she leaves in place should be practical and conducive to adoption by KWS as part of its long-term monitoring and evaluation activities.

6.0 The Utilization Study

76

6.1 Composition of team commissioned to undertake study undermines its credibility.

- *Even though the conclusions reached by the utilization study, that consumptive wildlife-use rights can and should be devolved to landowners is reasonable, the composition of the team that undertook it undermines its credibility. Some of the team members are closely connected with large private land holders and managers, the group that stands to benefit most from an easing of regulations controlling consumptive use of wildlife. The input from communities was minimal. This was reflected in an unbalanced analysis of the issues. Given the importance of the study due to its bearing on the current debate over consumptive utilization, we feel that its findings ought to be subjected to a review by a third party with no vested interest in Kenya's wildlife sector, and/or debated in conferences and workshops involving stakeholders.*

The wildlife utilization study funded by COBRA was undertaken by a team of consultants commissioned by the African Wildlife Foundation (AWF). The study looked at technical, policy, institutional, health, economics, and marketing aspects of wildlife utilization. In its recommendation for the devolution of wildlife-use rights to landowners, the study recognizes that KWS has a limited capacity to control and monitor consumptive wildlife utilization, and recommends a step-wise approach to the re-introduction of consumptive use. It is clear from the study that for the foreseeable future large-scale land owners would stand to benefit the most from wildlife utilization. Only this group is in a position to meet all the requirements for obtaining consumptive-use licenses.

The individual recruited to coordinate the study and conduct an analysis of the technical aspects of wildlife utilization is closely associated with owners and managers of large ranches in Laikipia. He himself managed a ranch in that district for several years. The individual that undertook the veterinary study is also a manager of a large ranch. The workshop on wildlife policy organized as part of the Utilization Study included virtually no community representation.

We found during our tour of Laikipia and Samburu, that not all communities are supportive of the easing of regulations controlling the consumptive use of wildlife. This is particularly true of pastoral societies. In at least two occasions, we were told that the communities were concerned that lifting of the hunting ban would trigger a wholesale slaughter of wildlife by outsiders that they, the community, would be unable to control. Since they now saw that wildlife has a value, they would like to see it conserved.

We also feel that the costs to landowners of conserving wildlife was overstated. For example, the author of the report on health aspects of wildlife utilization deviated from the topic at hand to illustrate the cost of wildlife due to competition to grazing by zebra. No similar digression was made to mention the benefits that accrue to ranches from non-consumptive use of wildlife, nor to call attention to blockage of wildlife corridors by fences surrounding private ranches.

Similarly, the technical component of the utilization study understated what appears to be some serious problems with the pilot utilization program now in place. For example, it is claimed in the report that wildlife numbers in Machakos are stable in spite of cropping. Close scrutiny of the data tells a different story.

The statement that overall wildlife numbers remained the same between 1991 and 1995 is correct. However, of the 8 ranches that had utilization quotas between 1991 and 1995, five registered a decline in wildlife numbers that ranged up to 42%. One ranch, however, claimed an increase in wildlife numbers of 256%. The remarkable biological performance of this one ranch made up for the loss in the other five ranches where wildlife numbers were reduced. Unfortunately, it is difficult to believe wildlife count figures, especially when quotas are calculated as a percentage of wildlife numbers as determined by the user.

Therefore, while agreeing with most of the recommendations reached by the utilization study, we feel that it lacked balance. For example, while much effort was dedicated to list the failures of the hunting ban, there was little discussion of the situation prior to its implementation. Nobody asked the question: What would have happened to Kenya's wildlife in the absence of a hunting ban? It is true that wildlife number continued to decline after the ban was imposed. However, did the rate of decline diminish? This lack of objectivity we attribute to the composition of the team that undertook the study. A different team probably would have come up with different recommendations.

As we have demonstrated, the fact that components of the Utilization Study was conducted by individuals who arguably have a vested interest in the easing of the restrictions on consumptive wildlife utilization, its findings lack credibility. Because the Utilization Study has a bearing on the current debate over consumptive wildlife utilization, and is likely to be subjected to close scrutiny by supporters and opponents of the hunting/culling ban, its validity needs to be evaluated by a reviewer with absolutely no vested interest in Kenya's wildlife sector. Alternatively, the findings of the Utilization Study may be the subject of a debate amongst stakeholders during workshops or conferences sponsored by KWS.

7.0 Fences for conflict mitigation

7.1 The implications of fences must be carefully considered.

- *Fences have been used by KWS/CWS as a tool for reducing conflict between people and wildlife. This practice is particularly useful when the conflict arises from land-uses that are clearly incompatible with wildlife such as irrigated agriculture. However, sociological and ecological criteria should be established to determine whether a fence should be erected or not. These should include: 1) that the fence constitutes a long-term solution to the problem; 2) that no other alternative is available; 3) that CWS is not involved in fencing projects that result in the de-facto privatization of wildlife; 4) that environmental impact assessments are undertaken; and 5) that the beneficiaries are held responsible for the maintenance of the fence.*

Certain categories of land use, such as irrigated agriculture, are incompatible with wildlife. If the cropped areas are small, fences may be used to effectively separate wildlife and cultivation.

The erection and maintenance of fences are costly propositions. Therefore, it is necessary that fence construction be undertaken only where it is judged to constitute a long-term solution to the conflict. In some instances, the increase in cultivated area is unavoidable and fence construction would constitute only a temporary solution. In others, the reduction in the level of human-wildlife conflicts

and the expectation that KWS will intervene to reduce the impact of wildlife on cropped areas may actually serve as an incentive to the expansion of cultivation in key wildlife areas. These questions and other ecological concerns indicates that fencing activities should only be approved upon the production of an EIA and a plan for the implementation of mitigation recommendations.

As stated above, the construction and maintenance of fences is expensive. Furthermore, fences may have significant impacts on wildlife, by denying them access to critical resources. Therefore, we feel that fences should be considered only when all other conflict reduction options have been considered. For example, in areas where irrigated agriculture is practiced and human-wildlife conflicts are restricted to narrow time windows, the cropping schedule may be planned around that window of time. Furthermore, given the intelligent nature of elephants, the primary culprit in human-wildlife conflicts, it is not far-fetched to imagine that these creatures may be trained to avoid cultivated areas. Once again, we are forced to ask whether twenty years of elephant behavior study in Amboseli has unearthed any clues as to what can be done to reduce elephant-agriculture conflicts.

Some of the fences that have been proposed in Laikipia would separate private ranches from communal areas. In one specific case, the ranch manager is requesting that the fence be erected on the community side of the river and along the only opening (3.8 km.) along the ranch's perimeter fence. For all practical purposes the wild animals would be captured within the ranch. This, according to the proposed KWS, policy would entail a *de-facto* privatization of wildlife. CWS is being asked to liaison with the community and secure funding for construction of the fence. The ranch manager maintains that the fence would be of primary benefit to the community.

Without questioning the intentions of the ranch manager, nor his contribution to wildlife conservation by allowing these animals to utilize ranch resources, we are inclined to caution CWS in getting involved in fencing projects that contribute to the appropriation of a public resource (wildlife) by individuals. We are also forced to ask whether the closure of wildlife corridors to mitigate the impacts of wildlife on a small patch of irrigated agriculture makes sense from the standpoint of Kenya's long-term economic development.

8.0 Some additional observations

8.1 Improved efficiency of key resource use also has a role to play in conflict resolution. An example from Kajiado.

Irrigated food crop production in semi-arid areas is incompatible with wildlife. On the one hand, wildlife damages crops, and on the other irrigated agriculture consumes and pollutes enormous quantities of water. If the irrigated area is small, crops may be protected by the erection of fences. Unfortunately, no readily available solution exists to compensate wildlife and pastoralists for the diminution and pollution of available water. A case in point is the existence of small scale but highly productive agriculture in some group ranches East of Amboseli. This activity is having deleterious effects in the swamps, a crucial resource for the survival of livestock and wildlife in the area. Therefore, CWS should investigate, in collaboration with the community and other stakeholders, ways to optimize water use and reduce the level of pollution.

8.2 KWS's proposed policy to bestow consumptive wildlife utilization rights on land holders may trigger a fencing spree that will block key wildlife corridors.

The proposed biodiversity conservation policy produced by KWS, aims at bestowing on landholders the right to utilize wildlife consumptively. Because of the significant benefits that may accrue from the consumptive utilization of wildlife, this policy may serve as an incentive for landholders to fence-in wildlife. This may have deleterious effects of wildlife conservation in Kenya by blocking wildlife corridors. Furthermore, the privatization of a public resource raises potentially serious legal and social issues.

Wildlife in open systems move as water along a channel. Are landowners allowed to dam river water at will just because it is temporarily within the confines of their property? The answer is of course no. We feel that KWS should carefully look at the effects of the proposed policy, keeping in mind that wildlife is a fluid resource. Currently, the policy contains no safeguards against a possible fencing frenzy it may trigger in some parts of the country.

80

Bibliography

- COBRA/CWS.1995. Conservation of Biodiverse Resource Areas Project: Work Plan and Budget, 1 July 1995-30 June 1996
- Girgir Group Ranch. 1995. Umoja Waso Women Group: Samburu Cultural Centre. Archer's Post, Kenya.
- Lambert, V. 1995. Monitoring and Evaluation Plan: COBRA. Nairobi: KWS/CWS.
- Irigia, B.K. 1995. Environmental Impact Assessment of the Proposed Kimana Wildlife Sanctuary. Kenya Wildlife Service, Nairobi.
- COBRA. 1996. Wildlife Utilization Study. Kenya Wildlife Service-African Wildlife Foundation, Nairobi.
- Butynsky, T.M., J. Kalina, W.K. Ottitichilo, and G. Runo. 1995. Kenya Wildlife Service's objectives, achievements, and challenges in wildlife conservation under the Protected Areas and Wildlife Service Project.
- East African wildlife Society. 1995. Proceedings of the Debate on Consumptive Utilization of Wildlife Outside Protected Areas of Kenya. Nairobi, August 7, 1995. East African Wildlife Society, Nairobi.
- Kenya Wildlife Service. 1996. Wildlife Policy 1996, draft version. KWS, Nairobi.
- United States Agency for International Development. 1991. Conservation of Biodiverse Resource Areas (COBRA) Project Paper. USAID, Nairobi.
- Kenya Wildlife Service Research and Planning Department. 1995. Annual Work Plan 1995-1996. KWS, Nairobi.
- Kenya Wildlife Service. 1994. Human-wildlife Conflict in Kenya. KWS, Nairobi.
- Kenya Wildlife Service. 1996. Policy Statement and Operational Summary for Benefit-Sharing and the Wildlife for Development Fun. KWS, Nairobi.