



**COMMENTARY ON THE LAKE ARPI MANAGEMENT PLAN, BUSINESS PLAN
AND SUPPORT ZONE DEVELOPMENT PLAN**

Prepared by the TJS Regional Office, October 2009

INTRODUCTION

In 2008, in the framework of KfW's Eco-regional Nature Protection Programme for the Southern Caucasus, the Transboundary Joint Secretariat (TJS) prepared draft regional guidelines¹ for national park management planning for application in Armenia, Azerbaijan and Georgia. The guidelines were based on IUCN's Guidelines for Management Planning of Protected Areas (GMPPA) and reflect all of the key elements of that document. The draft regional guidelines were prepared for the purpose of promoting international best practice in national park management planning in the region: in particular, protected areas projects financed by KfW were to take the guidelines into account during project implementation. Against this background, KfW asked the TJS to comment on the draft management plan (MP)², investment and business plan (IBP)³ and support zone development plan (SDZP)⁴ prepared by the implementation consultant (Consultant) for the Lake Arpi National Park and Sanctuaries.

We have based the commentary on criteria which are designed to reflect the main elements of the draft regional guidelines. The criteria are similar to those set out in the framework agreements between the Caucasus Protected Areas Fund (CPAF) and the Armenian Ministry of Nature Protection (MoNP) and Georgian Ministry of Environment Protection and Natural Resources (MEPNR) and which are intended to be used for assessing the management plans of protected areas supported by the CPAF or which apply to the CPAF for support.

At the request of the MoNP the TJS has prepared national guidelines on protected areas management planning for Armenia. The guidelines do not constitute a normative document and are only advisory. However, the MoNP will expect that management plans prepared by or on its behalf will be consistent with the national guidelines. The structure of the national guidelines for Armenia is different from the structure of the regional guidelines. There are also some differences in emphasis. However, the national guidelines are consistent with the regional guidelines in all key respects. Thus, although the commentary is based on the regional guidelines, it is also a basis for comparing the Lake Arpi management planning documents with the Armenia national guidelines.

¹ http://www.jointsecretariat.org/uploads/NPMPPGuidelines_DraftForPiloting_EN.pdf

² Lake Arpi National Park and Sanctuaries (Kkhuryan Gorge, Ardenis and Alvar) Management Plan Period 2009-2019. File <Management Plan_Lake Arpi NLP_17Aug09_Draft.pdf>

³ Lake Arpi National Park and Sanctuaries (Kkhuryan Gorge, Ardenis and Alvar) Investment and Business Plan Period 2009-2014 (Draft). File <LANP_BusinessPlan_17Aug09_Draft.doc>

⁴ Lake Arpi National Park Support Zone Economic Development Plan (Draft). File <LANP_Supp Zone Plan_4Sept.doc>

COMMENTARY

Note that the criteria are written in bold letters and our comments on the LANP management planning documents in plain letters.

A. MANAGEMENT PLANNING PROCESS REQUIREMENTS

1. Participation

1.1. The management plan's Vision, Zoning Plan, Objectives and Strategic Actions (management actions) were developed in a participatory process which engaged local communities and other people who use the natural resources of the PA (and its support zone where applicable). Decisions were adopted as far as reasonably practical by consensus.

The participatory planning process was innovative for Armenia and serves as a model for the region. The communities participated in the planning of the boundary of the national park, support zone and sanctuaries, the internal zoning of the national park the setting of objectives and policies to a remarkable degree. The communities' "gift" of community land to the national park, on the condition that they will continue to be able to use the land in a sustainable way, is a clear indication of their commitment to the national park. The continued participation of the local communities in the management of the national park will be assured by their representation in the management and decision making processes related to the LANP (provided that the Government of Armenia approves the governance structure proposed by the Consultant).

It is not completely clear from the management planning documents if all aspects of a fully formed participatory process were addressed. For instance, the process of selecting the members of the working groups is not made transparent and there is no information on the representativeness of the members. The list of names in the MP at page VI leads to the conclusion that representation by women in the working groups was very limited. It would be helpful to have more information on these points: not necessarily in the MP; perhaps instead in a separate "case study" which could serve as a basis for the "lessons learned" workshop which KfW has proposed.

The management planning documents do not provide any insights into, for example, the conflicts which the planning team faced and how (and to what extent) consensus was achieved. The proposed "case study" and "lessons learned" workshop mentioned above would help to inform people about the challenges of implementing a participatory planning process.

2. Consultation

2.1. Adequate opportunity was given to all those with an interest in the management of the PA to comment on a draft of the management plan before the management plan was formally approved. (Adequate opportunity means that the responsible body made a reasonable attempt to make people aware that the draft management plan was available and to encourage people to comment, and that a reasonable amount of time was given to people to submit their comments). During finalization of the management plan and before formal approval, due consideration was given to all written comments on the draft management plan.

It will not be possible to make a complete assessment of the consultation process until the management planning documents have been formally adopted, at which point consultation will be closed. The translation of the documents into the national language has fulfilled an important precondition for effective consultation. The Gyumri workshop provided an opportunity for many stakeholders to comment on the MP and IBP. However, adequate opportunity to comment does not appear to have been given so far to stakeholders beyond the project area (other than those who participated in the Gyumri workshop). The documents have not been posted on the LANP web site or anywhere else in the internet; also the deadline for public consultation is not given. That raises the question as to how far stakeholders have been given the chance to review and comment on the documents. It is not clear what further consultation if any is planned by the Consultant or the MoNP. The documents will be revised during the course of the next several months. The MoNP and/or the Consultant should take steps to ensure that consultation is carried out to a sufficient degree before the MoNP submits the documents to the government for approval.

It was evident from the MoNP's comments at the Gyumri workshop that the management planning documents did not meet the MoNP's expectations and some requirements of legislation. This outcome is surprising given that the MoNP had appointed a Programme Director to supervise project implementation and the National Coordinator who is heading the project implementation unit. It appears that the MoNP did not make full use of the opportunities open to it to ensure that the Consultant took full account of the MoNP's requirements. At the same time, the introductory paragraphs to the MP give the impression that the Consultant is presenting a final document to the government for approval, ignoring the MoNP's role as the responsible entity. Although this point is not directly related to the draft regional guidelines, we consider it to be important and have therefore included it in this commentary. The task of the consultants contracted to implement the national components of the BMZ/KfW Eco-regional Programme is to prepare draft plans for the responsible line ministries/agencies to submit to the government approval process once the plan has been finalized to the satisfaction of the ministry/agency.

B. MANAGEMENT PLAN CONTENT REQUIREMENTS

3. Territorial scope

3.1. *If the PA has a support zone (buffer zone), the management plan addresses, within the limits of the PA administration's powers and responsibilities, management of the support zone as well as management of the PA.*

The management planning documents fully address the criterion. The MP addresses policies and guidelines for the support zone. The separate SZDP was drafted to address socio-economic development activities.

For clear understanding of the interconnection between the MP and SDZP it would be helpful to use the same "wording" and to refer to the same goals in both documents. (e.g. rationale, objective and goals are formulated differently).

4. Description

4.1. *The management plan includes an account of the features of the area and the regional and international importance of the values which it will protect, how it is used, and its legal and management framework.*

The MP includes comprehensive information about the location, area, IUCN PA category, legal status, institutional and administrative structure, present day climate, hydrology and geology, landscape, habitats and flora and fauna. The information provided on settlements and population, current land use (traditional use, grazing), legal ownership, occupancy, tenure, access, other conditions and restrictions and economic activities is also comprehensive.

There is a lack of information on archaeology and on sites of historical and cultural significance. It is not clear if there are few interesting sites or if there is little information about what sites of interest exist. This information gap (and any others which might exist) may be due to the fact that KfW asked the Consultant to speed up the planning process and not to spend more time on baseline surveys.

The MP says nothing about climate change impacts or adaptation strategies. A statement on this topic is desirable. It may be that the Consultant judged climate change impacts not to be significant. Whatever the case is, the MP should say something about the matter.

The draft regional guidelines state "*IUCN's guidelines on the content of protected areas management plans include an evaluation of the national park's features of conservation significance and an analysis of threats and opportunities. In [these guidelines] we integrate the results of the evaluation into the description [section 2.4.1 of the guidelines] and the outcome of the analysis of threats and opportunities into the rationales for the vision, zoning plan and objectives and strategic actions [section 3.4 of the guidelines]*". The MP does not include a systematic analysis of threats and opportunities regarding the conservation values of the national park or the livelihood development for local people. Nor is there any discussion of the possible strategies for addressing whatever problems exist. The basis for the development of objectives and actions is therefore weak (but this is not to say that the objectives and actions are inappropriate).

5. Vision

5.1. The management plan includes a Vision which describes the desired state or condition of the PA (and its support zone if there is one) between 20 and 50 years into the future. The vision is detailed enough to provide a sound basis for developing objectives and strategic actions and concise enough that it can be easily grasped and understood by everyone who has an interest in the future of the PA.

The MP presents a vision (page 32) which fully meets the requirements proposed in the draft regional guidelines. However, the vision is very long and lacks focus. It is difficult for the reader to get a clear picture of the intended state of the national park and its support zone. This is partly a result of the very long sentences. The vision would be easier to understand if it was shorter and expressed in a more concise way how the national park should look in the future. The vision should provide a clearer direction for later decision making processes and provide a strong basis for the logical links from vision to goals and objectives. For example, the vision includes the tools of achieving the vision (e.g. international and national investment; innovative approach to the sustainable economic development). That kind of information should not be under the vision: it makes it unnecessarily long.

It is not useful or necessary to include the outcomes of the workshop at which the vision was developed in the MP: the ideas voiced (or written on cards) at the workshop are not always clear (e.g. population growth dependent on economic growth); and including the outcomes adds to the length of the document.

6. Zoning plan

6.1. If national law so requires, and in the case of any national park or other protected area designation equivalent to IUCN category II or below, the management plan includes a zoning plan. The zoning plan establishes as a minimum such zones as are required by national law and includes a strict protection zone in which human activity is limited to scientific research. The zoning plan identifies those parts of the PA in which traditional use of the PA's resources will continue to be allowed subject to certain policies implemented through strategic actions (management actions) described in the zoning plan or elsewhere in the management plan.

The MP fully meets the requirements proposed in the draft regional guidelines. The MP includes a zoning plan which is presented clearly and in detail. The zoning plan includes a core zone (strict protection zone) and a traditional use zone and policies for that zone.

6.2. The selection of zones and their boundaries ensures to the extent practical the protection of the area's ecological integrity while allowing for compatible human activities.

It is difficult to judge whether the MP satisfies this criterion or not because the justification for the selection of the zones and their boundaries is not presented in any depth.

7. Objectives and Strategic Actions

7.1. The management plan sets out the objectives which the PA administration will aim at during the life of the plan and the strategic actions (management actions) by which the administration plans to achieve those objectives. There is a clear logical link from the Vision to the Objectives and from the Objectives to the Actions.

The Lake Arpi MP has a different structure from that recommended by the draft regional guidelines (and by IUCN) and uses different terms for the hierarchy of objectives. The draft regional guidelines propose vision – objectives – strategic actions, with the objectives and strategic actions arranged within programmes. In contrast, after presenting the vision, the Lake Arpi MP sets out one “overriding objective” and six “goals”, and under each goal a number of measures. “Goals” in the LANP MP could be considered equivalent to “Objectives” in the draft regional guidelines and the measures under the “goals” in the Lake Arpi MP equivalent to strategic actions. However, the Lake Arpi MP then goes on to present four programmes which include statements that could also be considered equivalent to objectives or strategic actions in the draft regional guidelines.

The structure of the Lake Arpi MP makes it difficult to follow the logical linkages between the vision and objectives and the objectives and actions:

- Overall, all of the goals can be assumed to have a basis in the vision, e.g. promotion of tourism can be associated with “stabilizing the livelihood of local people”. However, some of the goals (p. 33 onwards) are not directly reflected in the vision (e.g. Goal 4: Promote the LANP and Support Zone as a tourist destination). On one hand the vision is too general but on the other hand it gives quite specific information, such as honey production, sheep wool processing and traditional carpet making, and this makes it difficult to judge whether goals are properly reflected in the vision. A more balanced formulation would be desirable.
- The relationships between the vision, goals and measures (chapter 2) on the one hand and the programmes, policies and guidelines (chapter 4) on the other hand are not always apparent: it is difficult to trace some of the content of the programmes to the goals and measures. Conversely, some elements of the goals and measures are not adequately reflected in the programmes (e.g. goal number 5: Financial sustainability of the LANP, associated sanctuaries and the support zone). It is also difficult to determine from the MP how implementation of the policies and management guidelines under the programmes will be ensured.

In conclusion the structure of the MP makes it difficult to identify exactly what the NP administration should be aiming to achieve during the lifetime of the plan, why it should be aiming to achieve it, and what would be the consequences of not achieving it. (See also the comments under 7.2, 7.3 and 8 below.)

7.2. The objectives should address the following as a minimum:

- **development of the administration**
- **conservation of biodiversity in the PA**
- **development of sustainable livelihoods in the support zone (where applicable)**
- **visitor management (where applicable)**

These thematic programmes are covered by the MP. However, specific, measurable objectives are not clear for any of the thematic programmes. The chapter on programmes (which is misleadingly titled “management guidelines for operations”) deals mostly with management policies (but in some instances describes major actions such as construction of the LANP HQ and staff housing).

It would be helpful to the LANP administration to prioritise the planned actions, especially since funding may not be available to pay for all of the proposed actions.

7.3. The objectives and strategic actions (management actions) are based on a description of the system of causes and effects that determine the future state of the PA. The description of the system of causes and effects makes best possible use of the information available to the planning team at the time the management plan was prepared including the knowledge of local people.

There is no description of the system of causes and effects that determine the future state of the LANP.

The lack of a clear, consistent presentation of the programmes makes it difficult to fully understand them and to connect them to the objectives, e.g:

- the programme “*Tourism, environmental awareness /public relations and research and monitoring*” does not make any distinction between objectives and policies in regard to tourism. An implementation strategy besides the establishment of infrastructure is not mentioned;
- the “environmental monitoring programme” is very weak and not detailed enough.

8. Monitoring plan

8.1. The management plan includes a monitoring plan which:

- **lists and explains the rationale for selecting the indicators which will be used as the basis for determining success or failure in achieving the objectives of the management plan and the reasons for failure;**
- **describes the sources of information which will be used for monitoring;**
- **defines responsibilities for collecting and collating information.**

The MP has a number of weaknesses with regard to this criterion:

- The MP does not include a monitoring plan designed to check the effectiveness and implementation of the MP. The MP does not establish any indicators for monitoring.
- The structure of the MP (in relation to vision – goals – objectives – programmes – policies) makes it difficult to construct a performance-focused monitoring plan since the impact chains are not formulated.
- The programme "Tourism, environmental awareness /public relations and research and monitoring" talks only about environmental monitoring.

A monitoring plan for the MP should be added as a separate chapter, with tentative indicators, periodicity and responsibilities.

9. Review cycle

9.1. The management plan states the period of validity of the plan, the date by when it should be reviewed and revised and the body responsible for arranging for review and revision.

The MP includes a proposal for review and revision after 5 years, but this should be formally stated on adoption by the government.

10. Adaptive management approach

10.1. The management plan is based on an adaptive management approach.

The MP is not based on an adaptive management approach. To apply an adaptive management approach, a strong logical structure of the MP is essential and indicators on which to base monitoring are necessary. The current version of the MP is weak in presenting a logical structure and does not work at all with performance and impact indicators. Adaptive management strongly depends on the statements of a well functioning monitoring system. Adaptive management as a term is not mentioned at all in the documents; however, the process of review and revision will allow adaptive management to take place, e.g. the management board will have some flexibility in steering and adapting the activities under the MP.

11. Points concerning the MP which are not addressed by the draft regional guidelines

The MP contains a lot of detail which is not necessary or helpful in what is intended to be a strategic document. For example:

- Information on the institutional framework is longer than it needs to be. Detailed information could be presented in an Annex;
- The policies and guidelines for the zones (chapter 3) and programmes (chapter 4) address some issues which would be better covered by separate documents, for example staff appraisal procedures, the prices for renting land;

If a MP has to be as long as 117 pages it would be helpful to include an executive summary: not every person who needs to know the main issues raised and proposals made by the document has the time to read all of it. The summary should give an overview of the essential points of the document.

C. CONTENT REQUIREMENTS FOR THE OPERATIONAL PLAN OR EQUIVALENT DOCUMENT(S)

12. Scope and content of the operational plan

We have assumed that the IBP and SZDP together are intended to fulfil the requirements of the Operational Plan envisaged by the draft regional guidelines.

12.1. The operational plan or equivalent document(s) sets out:

- ***the activities which the PA administration plans to carry out in the years covered by the plan in relation to key management tasks such as: patrolling; biodiversity; monitoring; land management; mapping; tourist and recreation; public awareness, community outreach and similar programs; physical and operational plan; equipment and premises; human resources; financial administration; functional organization.***
- ***the physical resources which will be employed to carry out the scheduled activities;***

The above points are reflected in the business plan. The business plan is fully financed and has a clear timeline. It sets out all the costs of planned activities for 5 years. However, the concepts for biodiversity, monitoring, tourism and recreation, public awareness and community outreach are left quite general.

The SZDP is not fully financed and therefore no timelines are set. This makes the document weak. The financing of some activities is secured by KfW. It is envisaged that the creation of a SZ fund is possible and that this fund will be a financial source for activities in the SZ. The elaboration on the concept for the support fund is too short and vague. It is not clear how realistic the creation and financing of this fund is. Furthermore, strong hopes are drawn from a second phase of KfW financing. No evidence for that hope is given in the documents.

13. Logical relationship of the operational plan to the management plan

13.1. The activities specified in the operational plan must adequately address implementation of the management plan, and there must be a clear logical relationship between the activities scheduled in the operational plan or equivalent document(s) and the objectives and strategic actions (management actions) in the management plan.

The business plan refers to each of the programmes of the MP.

The planned activities and costs are arranged by programme; this makes it possible to understand to some extent the relationship between the planned activities and the goals and objectives, and programmes and policies set out in the management plan. However, the weaknesses in relation to the impacts chain in the MP (see in particular 7.1 and 7.3 above) flow through to the IBP: it is sometimes difficult to find in the MP the justification for activities and resources in the IBP. Assuming that the IBP will be reviewed and updated at regular intervals by the LANP administration, it will be difficult for the administration to decide what needs to be changed because the MP does not make clear what has to be achieved.

14. Points concerning the IBP and SZDP which are not addressed in the draft regional guidelines

The first part of the Chapter 3 under the SZDP repeats the 1.8-1.9 sub-chapters of the management plan. The added value of that repetition is not apparent.

OVERALL CONCLUSIONS

The participation of local communities in the development of the MP, IBP and SDZP is a huge step forward for management planning in Armenia and serves as a model for the region. The extent of participation by women and the extent of the consensus among the entire population of the support zone are not described in the documents.

There are substantial differences in the structure and content of the Lake Arpi management planning documents compared with the recommendations in the TJS draft regional guidelines and the IUCN Guidelines for Management Planning of Protected Areas.

The MP lacks:

- a structured evaluation of the conservation of values of the protected area (TJS draft regional guidelines, section 2.3 and subsequent sections);
- a systematic analysis of issues/problems/threats (TJS draft regional guidelines, section 2.3 and subsequent sections);
- a description of the system of causes and effects which determine the future state of the national park (TJS draft regional guidelines, section 3.3.3);
- clear logical links from vision to objectives and objectives to actions (TJS draft regional guidelines, section 3.1.1);
- a monitoring plan with indicators for determining effectiveness of implementation and of the planned actions (TJS draft regional guidelines, section 3.4.4).

The MP does not apply an adaptive management approach (TJS draft regional guidelines, section 3.1).

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