



Final Report

Mid Size Sustainable Energy Financing Facility (MidSEFF) Yahşelli Wind Power Plant: Non-Technical Summary (NTS)

June 2019

TÜRKİYE  BANKASI

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This report has been prepared by “Nord En. Dan. Ltd. Şti.” and reviewed by “Stantec Mühendislik ve Müşavirlik Ltd. Şti.”, for the European Bank for Reconstruction and Development (EBRD) in relation to the above-captioned project and is confidential to the client. Neither the Companies nor any person acting on their behalf, including any party contributing to this report, makes any warranty, expressed or implied, with respect to the use of any information disclosed in this report; or assumes any liability for direct, indirect or consequential loss or damage with respect to the use of any information disclosed in this report. Any such party relies upon this report at their own risk.

Prepared by
Nord En. Dan. Ltd. Şti.

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Acronyms

BERN	Bern Convention
CITES	The Convention on International Trade in Endangered Species of Wild Fauna and Flora
EAR	Ecological Assessment Report
EBRD	European Bank of Reconstruction and Development
EIA	Environmental Impact Assessment
EMMP	Environmental Management and Monitoring Plan
ETL	Energy Transmission Line
IUCN	The International Union for Conservation of Nature
LC	Least Concern
MidSEFF	Mid-Size Sustainable Energy Financing Facility
MoAF	Ministry of Agriculture and Forestry
MoEU	Ministry of Environment and Urbanization
MoFWA	Ministry of Forestry and Water Affairs
MWe	Megawatt electrical
MWm	Megawatt mechanical
PC	Project Consultant (MidSEFF)
SEP	Stakeholder Engagement Plan
Sponsor	Ataseven Group
Sub-borrower	Gökteperes Elektrik Üretim A.Ş.
TA	Technical Advisor (Nord Enerji Danışmanlık Ltd. Şti.)
UTM	Universal Transverse Mercator
WPP	Wind Power Plant
VU	Vulnerable

1. General Plant Description

The Yahşelli WPP Project consists of 6 wind turbines to be constructed under the legal status of the Gökteperes Elektrik Üretim A.Ş. (The Sub-borrower), established to build and operate the WPP project located in İzmir Province. Türes Elektrik Üretim A.Ş. owns all shares of the Gökteperes Elektrik Üretim A.Ş. The Sponsor of the project is Ataseven Group. Ataseven Group was established in 1992 in Ankara, Turkey. The Group is active in the renewable energy and construction sectors.

The Yahşelli WPP is planned to have a total installed capacity of 21.6 MWm/20 MWe (6 wind turbines with 3.6 MW capacity/each) located in the İzmir Province, Menemen District and Karşıyaka District. According to the latest layout, which is obtained from the Sponsor, turbines T1, T2, T3 are located in the Sancaklı Neighborhood, T4 is located in the Yamanlar Neighborhood and T5 and T6 are located in the Göktepe Neighborhood. The Yahşelli WPP Project is planned to generate 72,300,000 kWh/y (P75) of electricity. The location of the Yahşelli WPP project is shown in Figure 1-1.

Construction of the WPP project is planned to start in May 2019 according to the information provided by the Sponsor and the turbines will start to generate electricity by the end of the 2020 according to the latest timetable provided by the Sponsor.

The Project site is registered as forestry area, meadow area and public area. No physical and economic resettlement is expected within the scope of the project. The land acquisition/expropriation process has been completed in compliance with national regulations and related permit have been obtained from the authorities.

The Yahşelli WPP project was initially composed of 16 wind turbines and 20 MWm total installed capacity and was granted with an "EIA is positive" decision by the letter of the Ministry of Environment and Urbanization dated (MoEU) 22 February 2018. Later, the Sponsor changed the configuration to 8 turbines and with an 8.8 MWm capacity increase with the approval of the Ministry of Environment and Urbanization dated 28 June 2018. Another amendment was made to the number of turbines to now 6 turbines with a total of 21.6 MWm (1.6 MWm increase) in the same project area with the approval of the Ministry of Environment and Urbanization dated 26 July 2018. Consequently, the revised project has now 6 wind turbines with a total installed capacity of 21.6 MWm/20 MWe.

The EIA study has been conducted on the basis of the initially planned 16 turbine locations. However, only 6 of the turbines will be constructed. The Sponsor completed the EIA process and successfully obtained the approvals required by the Ministry.

The Sponsor has obtained the Electricity Production License dated 22 November 2018 (amended on 03 January 2019) for the Yahşelli WPP project and shared it with the Technical Advisor (TA) and MidSEFF Project Consultant (PC).

The Grid Connection Agreement was signed based on the license with Gediz Elektrik Dağıtım A.Ş. dated 25 March 2019.

A new Electricity Transmission Line (ETL) will be constructed for the connection to the electricity distribution system. A connection will be made to the existing 34.5 kV (Medium Voltage Level) Ulucak Substation. The Sponsor will construct a 5,359 m overhead transmission line and 3,636 meters underground transmission line for the connection to the Ulucak Substation according to the grid connection agreement dated 25 March 2019.

The Yahşelli Wind Power Plant (WPP) is located at a distance of 3.61 km to the Menemen District center and 9.5 km to the Karşıyaka District center. The closest residential areas which may be affected by its operation are Göktepe, Sancaklı and Yamanlar Neighborhoods; the distances between the turbines and the closest single housing units for each neighbourhood are approximately 520 m to T6, 805 m to T2 and 875 m to T4, respectively.

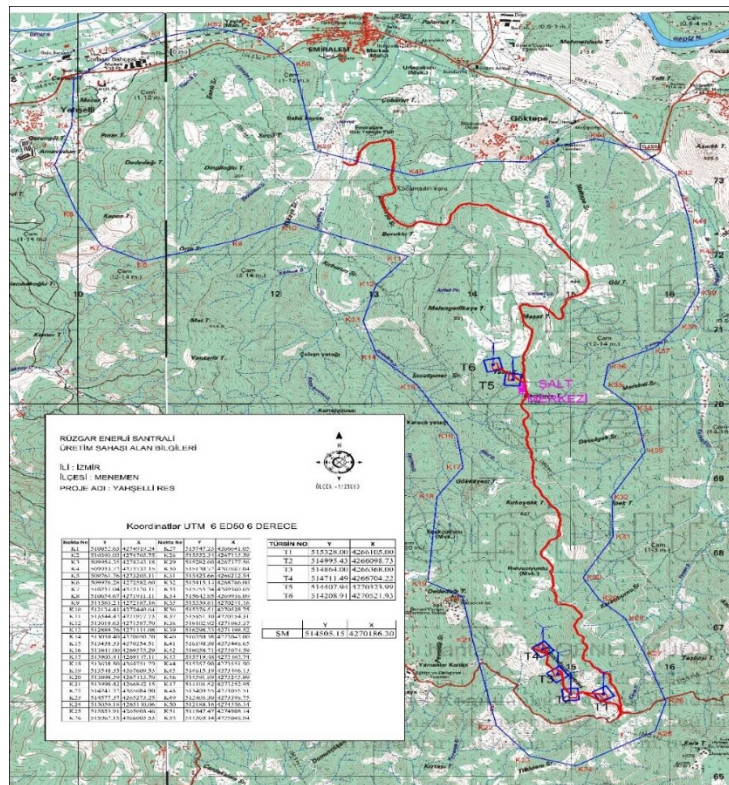


Figure 1-1: The View of Yahşelli WPP

The wind turbines of the Yahşelli WPP will be purchased from Nordex. All of the six wind turbines are Nordex N131/3600 model with a capacity of 3.6 MWm each. The technical specifications of the 6 turbines planned to be used are given in the table below:

Table 1-1 Turbine Specifications

Parameter	UoM	Nordex N131 Specifications
Rated Power	MWm	3.6
Rotor diameter	m	131
Hub height	m	84
Swept area	m ²	13,478
No of rotor blades	#	3

The coordinates (UTM6- ED50 Coordinate System) of these 6 turbines are given in Table 1-2 below according to the Electricity Generation License (No. EU/8204-3/04126, dated 22 November 2018 and amended on 03 January 2019).

Table 1-2: The Coordinates in UTM6 (ED50 Datum) of the Proposed Turbines

Turbine	Latitude	Longitude
T1	515328.00	4266105.00
T2	514995.43	4266098.73
T3	514864.00	4266368.00

T4	514711.49	4266704.22
T5	514407.94	4270323.99
T6	514208.91	4270521.93

Summary table of the Yahşelli WPP project can be seen in the **Table 1-3** below:

Table 1-3: Key Project Summary Data

Key Project Summary Data	
Project Borrower	Gökteperes Elektrik Üretim A.Ş.
Project Sponsor	Ataseven Group
Project Description / Business Purpose:	The Yahşelli Wind Power Project (WPP) consists of 6 wind turbines to be constructed with a total of 21.6 MWm/MWe capacity is established to build and operate the WPP project located in İzmir Province.
Key Parties Involved:	-
Project Name	Yahşelli Wind Power Plant Project
Project Type	Wind Power Plant
Base Case Scenario:	
Installed Capacity, MWe	21.6 MWm / 20 MWe
Annual Electricity Production, kWh/year	72,300,000 kWh/year
Estimated Project Date and Duration:	
The project start date (designing)	December 2016
Construction period (1st / 2nd parts)	23 months (May, 2018 / April, 2020)
Expected date of commissioning (Provisional Acceptance by TEDAŞ)	30.04.2020
Expected date of operation	01.05.2020
The project lifetime	49 years license / 25 years lifetime for the wind power plant

2. Environmental and Social Baseline

2.1 Environmental Description of the Project Area

The Yahşelli WPP project is planned to have total installed capacity of 20 MWe/21.6 MWm and annual electricity generation of 72.3 million kWh/year (P75). The WPP project is composed of 6 wind turbines located in İzmir Province. Construction of the WPP project is planned to start in May 2019 according to the information provided by the Sponsor and the turbines will start to generate electricity by the end of the 2020 according to the latest timetable provided by the Sponsor.

Summary of the environmental characteristics of the project is given below.

Table 2-1: Summary of Environmental Characteristics

ENVIRONMENTAL ASPECTS	PRESENCE /DISTRIBUTION	COMMENTS
Land use	<p>The Project site is registered as forestry area, meadow area, individual property and treasury land.</p> <p>Rental agreements for 10 years and easement rights approvals for 49 years have been obtained from the Ministry of Environment and Urbanization General Directorate of National Estate. In addition, final forest permit, meadow usage permit have been obtained and expropriation processes have been completed.</p>	<p>According to the information provided by the Sponsor, for the forest areas, which constitutes the major part of the project area, the final Forest permits were obtained.</p> <p>The land acquisition process has been completed and all relevant permits have been provided for the Yahşelli WPP and OHL.</p> <p>No physical and economic resettlement is expected.</p>
Water surfaces	<p>According to the Ministry of Forestry Water Affairs General Directorate of State Water Affairs official opinion dated 06 October 2017, some of the turbine locations of Yahşelli WPP are within the medium and long-range protection zone of the Değirmendere Dam and the long-range Bostanlı Dam protection zone.</p> <p>Değirmendere Dam is located at 1.1 km distant to the nearest turbine, T5.</p>	<p>The Yahşelli WPP Project has no interaction with any water surface area during the project works.</p> <p>As long as the necessary measures, which are specified in the official letter of the Ministry, are taken, there are no other specific protection actions requested by the Ministry regarding the dams within the project area.</p>
Protected areas	<p>The border of the closest archaeological protected site, Melanpagos Ancient City is 1,150 m to T5. There is also Yamanlar Mountain Nature Park near to the project site, approx. 1,000 m to the nearest turbine (T4).</p>	<p>There will not be any interaction with any protected areas during the project works.</p> <p>After the İzmir Cultural Heritage Conservation Board no.2 decision, the project area was revised, and the Board decided that there is no objection to the Project on 13 September 2017.</p>
Flora and Fauna	<p>According to the Ecological Assessment Report (EAR) there are 7 Critical Plants. Their names and Red Data List status is as follows:</p> <ul style="list-style-type: none"> • <i>Ferulago humilis</i> (endemic-LC), • <i>Alkanna areolata</i> var. <i>areolata</i> (endemic-LC), • <i>Aristolochia hirta</i> (endemic-LC), • <i>Fraxinus ornus</i> subsp. <i>cilicica</i> (endemic-LC), • <i>Cyclamen hederifolium</i> (non-endemic-VU), 	<p>Seasonal (once in 3 months) bird monitoring and flora-fauna studies will be conducted during the construction and the first 2-years of the operation.</p> <p>Barrier effect of wind turbines must be observed during the monitoring studies.</p>

	<ul style="list-style-type: none"> • <i>Campanula lyrata subsp. lyrata</i> (endemic-LC), • <i>Anthemis aciphylla var. aciphylla</i> (endemic-LC) <p>There is only one critical mammalia species, plus one reptile and two aves species on the project site. Their names and protection status are as follows:</p> <ul style="list-style-type: none"> • <i>Mammalia-Miniopterus schreibserii</i> Kuhl, 1817 ((IUCN: NT/ Bern: Appendix-II) • <i>Reptilia-Testudo graeca</i> (Linnaeus, 1758) (IUCN: VU/ Bern: Appendix-II) • <i>Aves-Pelecanus crispus</i> (IUCN: VU/ Bern: Appendix-II) • <i>Aves-Streptopelia turtur</i> (IUCN: VU/ Bern: Appendix-III) <p>According to the Ornithological Assessment Report (Ekogen-2017) the project site is not on the route of migrating birds.</p>	<p>Landscape Restoration Monitoring Plan will be implemented by considering the monitoring activities for tree felling, topsoil management and erosion risk.</p> <p>Landscape Restoration Monitoring Reports will be prepared during the construction and first 3 years of operation phases.</p>
<p>Visual Impact Assessment</p>	<p>The nearest residential areas which may be affected by the visibility of the turbines during operation, are Göktepe, Sancaklı and Yamanlar villages.</p>	<p>A Visual Impact Assessment by means of the photo-impact simulations from significant or sensitive viewpoints (e.g. populated areas, scattered houses, school, hospital, highways, etc.) will be prepared based on the final turbine configuration.</p> <p>A Shadow Flicker Assessment will be carried out to simulate any annoyance at the settlements and at any other receptors.</p>
<p>Cumulative impact assessment</p>	<p>There are no wind power plants in operation nearby the project area however the construction activities and other existing or planned project activities' cumulative impacts will be assessed.</p>	<p>A CIA considering the other WPPs around (Yılmaz WPP), the construction of new roads, all industrial facilities, all mining licensed areas ((if any activities started)), all electricity transmission lines and other existing or planned projects in close proximity to the project including specific reference to bird life and landscape both for the construction and operation period will be prepared.</p>

2.2 Social Condition of the Project Area

The WPP project is located in the Menemen and Karşıyaka Districts of İzmir Province. According to the 2018 statistics, the population of İzmir Provinces is 4,320,519 people. According to the same statistics, the population of the Menemen and Karşıyaka Districts are 174,564 and 344,140 respectively.

The closest settlements to the Yahşelli WPP can be seen in the table below.

Table 2-2: List of closest single housing units and nearest settlements

Turbine No	Distance to the closest single housing units	Distance to the Nearest Settlements	Nearest Neighborhood
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T1	1,045 m	3,150 m	Sancaklı
T2	805 m	2,900 m	Sancaklı
T3	910 m	3,130 m	Sancaklı
T4	875 m	3,090 m	Yamanlar
T5	610 m	3,060 m	Göktepe
T6	520 m	3,255 m	Göktepe

The major part of the project area belongs to the Ministry of Forestry and Water Affairs (MoFWA). A Final Forest Permit was received from Ministry of Agriculture and Forestry (MoAF) on 13.03.2019 for a 260,544 m² area. A part of the entry road enlargement area is registered as private land. This private land was expropriated by the Treasury Department and property and expropriation fees have been paid by the Sponsor. Thus, no physical and economic resettlement is expected.

3. Social and Environmental Impacts

3.1 Land Use

The Yahşelli WPP Project is located in a rural area and all turbine construction areas, the control building and access roads are within a forestry area. The final Forestry Permit was secured for the Yahşelli WPP project. A part of the entry road enlargement area is registered as private land. This private land was expropriated by the Treasury Department and property and expropriation fees have been paid by the Sponsor. Thus, no physical and economic resettlement is expected. A Landscape Restoration Plan was prepared for the Project.

A Landscape Restoration Monitoring Reports will be prepared including the monitoring activities for tree cutting and erosion risk both during the construction and first 3 years of operation period. Topsoil management will be monitored as part of this report as well.

3.2 Water Use & Wastewater Management

Water will be used for the dust suppression and potable water demand of workers during the construction and operation phases. Based on the assumption that the daily domestic water requirement is 203 L per capita (TUIK – 2014), considering 30 employees during the construction phase and 10 employees during the operation phase, the domestic water requirement (and, consequently, discharge) estimated to be 6.09 m³/day and 2.3 m³/day respectively. The water used for dust suppression and potable water will be supplied from the nearby neighbourhoods, whereas drinking water will be supplied as bottled water. Domestic waste waters generated by project workers will be collected in impermeable septic tanks constructed in line with Turkish regulations. The wastewater will be transferred to the closest treatment plant by vacuum trucks of the Menemen Municipality.

Water used for spraying activities to minimize dust emissions is estimated to be 100 m³/day.

Water demand will be only for the staff operating the plant in the operation phase of the project. Potable water will be provided from the nearby settlements.

3.3 Waste Production and Management

The solid waste that is expected to be generated at the Yahşelli WPP project consists of excavation waste (from the preparation of tower foundations, excavation for cabling, access roads), domestic solid waste (household and recyclable wastes), oil waste, tire waste etc.

Daily domestic solid waste production is estimated as 1.08 kg per capita, resulting in a total of 32.4 kg/day and 10.8 kg/day taking into account respectively 30 project workers during construction phase and 10 project workers during operation phase.

The domestic solid waste generated from the needs of working staff will be collected in the closed garbage bins distributed in the area. The waste collected in the bins will be transferred to waste containers and will be disposed by utilizing the Menemen Municipality facilities according to the Waste Management Regulations.

Waste carton, paper, sack, glass, nylon and the packages of the materials will be collected separately from other wastes and will be stored in a closed area protected from rain and wind. These wastes will be collected by a Licensed Collector brought to separation facilities for recycling.

Repair or maintenance of vehicles tyres will be made by the relevant companies outside of the project area. Consequently, no waste tyres will accumulate in the project area.

Waste oil is expected to be generated from the maintenance of the turbines and generation of approximately at 2,400 litres/year. Any waste oil will be handled as required by the "Regulation on Control of Waste Oil".

A proper solid waste storage area should be constructed and hazardous waste, packaging waste and domestic waste should be stored separately.

A Waste Management Plan will be developed for the construction and operation phases of the Project. The plan must cover management of solid and liquid wastes, dust and noise emissions on the environment.

3.4 Birds and other species

The 6 units of endemic plant species of Turkey that were identified in the project area are widely distributed species in the Aegean and Central Aegean regions of Turkey. Only cyclamen hederifolium is a VU category species. All other flora species fall under the category of LC (least concern) according to the IUCN hazard categories.

According to the Ecological Assessment Report there are 7 Critical Flora species. Their names and Red Data List status is as follows:

- *Ferulago humilis* (endemic-LC),
- *Alkanna areolata* var. *areolata* (endemic-LC),
- *Aristolochia hirta* (endemic-LC),
- *Fraxinus ornus* subsp. *cilicica* (endemic-LC),
- *Cyclamen hederifolium* (non-endemic-VU),
- *Campanula lyrata* subsp. *lyrata* (endemic-LC),
- *Anthemis aciphylla* var. *aciphylla* (endemic-LC)

There is only one critical mammalia species, one reptile species and two aves species on the project site which are not endemic in Turkey. Their names and protection status are as follows:

- *Mammalia-Miniopterus schreibserii* Kuhl, 1817 ((IUCN: NT/ Bern: Appendix-II)
- *Reptilia-Testudo graeca* (Linnaeus, 1758) (IUCN: VU/ Bern: Appendix-II)
- *Aves-Pelecanus crispus* (IUCN: VU/ Bern: Appendix-II)
- *Aves-Streptopelia turtur* (IUCN: VU/ Bern: Appendix-III)

According to the Ornithological Assessment Report (Ekogen-2017), the project site is not on the route of migrating birds. As a requirement stated by in Ornithological Assessment Report, at least a two years period of monitoring will be needed to observe the barrier effect of turbines, starting from the construction of the WPP and including the first two years of operation.

Cyclamen hederifolium included in the Appendix-2 of the CITES Convention was identified in the project area. As *Cyclamen hederifolium* is a species being traded commonly, the population density is decreasing throughout the area. Therefore, collection of the tubers of this species from the areas where the project units are planned (turbine platforms, access roads, control building etc.) by a biologist in the autumn period and subsequent their transfer into 5-10 cm deep herbal soil in similar habitats was evaluated as reported in the EIA Report.

There is no area with legal protection value in the project area or its vicinity. Although there are no natural lakes or wetlands important for the fauna in the region, there is a small irrigation pond within the project area but outside the turbine locations. There is no concentration of wildlife in the region.

As a result of the ornithological study it was concluded that the Yahşelli WPP area was at the expected level in terms of species diversity. The migration transitions occur in very low numbers. It is likely that most species are native species. These birds will be affected by construction activities, but bird populations are likely to return to their normal level after the end of construction. It was noted that the birds in the area in general fly low and therefore monitoring activities should be continued during the operation phase.

An Ornithological Monitoring Report and a Flora/Fauna Monitoring Report must be prepared every 3 months during construction and in the first 2 years of operation.

3.5 Emissions: Noise and Particulate

Dust emissions and exhaust emissions will be emitted. Dust emissions which will arise from the construction activities is foreseen to be 0.95 kg/h (lower than the limit value of 1 kg/hour) in the EIA Report. In the EIA, exhaust emissions were also calculated. It was concluded that the impact on air quality will be negligible. All proposed mitigation measures in the EIA (Savra Ltd., 2018) must be implemented.

Noise emissions will be generated during construction due to equipment/machinery operation. A noise assessment study in the EIA shows that noise emissions are likely to be at acceptable levels and the sponsor is obliged to work according to the related regulations.

The project is located in a rural area. The closest single housing unit in the Göktepe Neighbourhood is at 520 meters distance to the project area. The closest residential areas to the plant area are Göktepe, Sancaklı and Yamanlar Villages. The distances between the turbines and the single housing units are approximately 520 m to 1,045 m.

The baseline noise assessment has been conducted and measured 55 dBA at the nearest house (which is used as a cottage temporarily) which is the closest to the chosen turbine location (EIA, 2018). According to the assessment, noise emission during the construction and operation phases in the closest residential areas will be in line with the regulation standards and limits. The noise assessment report has been prepared for the 16 turbines; however, the turbine configuration has been revised to 6 turbines so the noise assessment shall be revised by considering the new turbine configuration. In addition to the noise assessment report, the Sponsor will also consider a noise measurement campaign before operation once all turbines are in operation (both for day and night time) and in case of any grievance.

3.6 Landscape

Landscape is usually a sensitive aspect for this kind of project. Considering the location of the project, it is required out a Visual Impact Assessment Study which includes photo-impact simulations from significant or sensitive viewpoints to assess the impact on landscape.

A Landscape Restoration Plan was prepared by Ekogen in 2017 for the construction and operation activities. Furthermore, a Tree Cutting Plan was prepared by the Sponsor and approved by the Ministry of Agriculture and Forestry. Erosion risks and preventive measures have also been considered by Ekogen within the Landscape Restoration Plan 2017. The project will be also supervised and monitored by taking into account required mitigation measures regarding landscape during construction and after project completion during operation phase. Landscape Restoration Monitoring Plan will be prepared both for the construction and operation phases. Landscape Restoration Monitoring Reports must be prepared during construction and first 3 years of operation.

No shadow flicker analysis was performed for the Project. However, since potential shadow flickering impact is accepted as one of the most important impacts of wind turbines, a modeling study must be conducted in order to estimate the shadow casting areas and to create shadow model for each of the wind turbine.

3.7 Summary of Environmental and Social Impacts

A summary of the impacts with their quantifications is given below.

Table 3-1: Impact Quantification

COMPONENT	IMPACT	QUANTIFICATION
Land use	<u>Use of forestry land, meadow land, treasury land and private land</u>	The land acquisition process has been completed and all relevant permits (forest permit, meadow usage permit, expropriation, rental agreements, easement rights approvals) have been provided.
Wastewater	<u>Water utilization and discharge</u>	6.09 m ³ /day and 2.3 m ³ /day domestic wastewater during the construction and operation phases, respectively (assuming 30 workers in the construction phase and 10 workers in the operation phase).
Waste	<u>Production of solid waste</u>	32.4 kg/day and 10.8. kg/day domestic solid waste during the construction and operation phases, respectively (assuming 30 workers in the construction phase and 10 workers in the operation phase).

<p>Birds and other Fauna and species</p>	<p><u>Interference with bird and flora-fauna species</u></p>	<p>The Sponsor is committed to conduct bird monitoring and flora-fauna monitoring during the construction phase and first 2 years of the operation phase every 3 months.</p>
<p>Emissions</p>	<p><u>Noise</u></p>	<p>The noise assessment report has been prepared for Yahşelli WPP with the previous turbine configuration (16 turbines); however, the noise assessment report shall be revised by considering the final turbine configuration (6 turbines). By considering the distance between the turbines and the residential areas, the Sponsor will need to carry out a noise measurement campaign once all turbines are operational (both for day and night time) and in case of any complaint.</p>
	<p><u>Particulate (Dust & Gaseous Emissions)</u></p>	<p>During construction, dust emissions and exhaust emissions will be occurred. Dust monitoring is required during the construction phase. Mitigation measures regarding air emissions will be addressed in the Waste Management Plan.</p>
<p>Landscape</p>	<p><u>Changes in the aspect of the area</u></p>	<p>“Visual Impact Assessment Study” and “Shadow Flicker Assessment” will be prepared and implemented for the Project. In addition, Landscape Restoration Monitoring Reports, including the monitoring activities for tree cutting and erosion risk will be prepared for the construction and operation phase by taking mitigation measures defined in the Landscape Restoration Plan.</p>
<p>Cumulative Impacts</p>	<p><u>Other WPPs and ETL’s</u></p>	<p>The Sponsor will evaluate a Cumulative Impact Assessment Report considering the Yılmaz WPP, the construction of new roads, all industrial facilities, all mining licensed areas, all electricity transmission lines and other existing or planned projects in close proximity to the project with specific reference to bird life and landscape both for the construction and operation period.</p>

MidSEFF Office

Salih Omurtak Cad., No. 61

Kosuyolu

34718 Kadikoy, Istanbul

TURKEY

www.midseff.com