

# Armutcuk Wind Power Plant (WPP) Project

Critical Habitat Assessment (CHA)

June 2024

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# Armutcuk Wind Power Plant (WPP) Project

Critical Habitat Assessment (CHA)

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## **Definitions and Abbreviations**

AoAArea of AnalysisAoIArea of InfluenceAZEAlliance for Zero ExtinctionBAPBiodiversity Action PlanBMMPBiodiversity Management and Monitoring PlanCHACritical Habitat AssessmentCITESConvention for the International Trade in Endangered Species of Wild Fauna and FloraCRCritically EndangeredCRMCollusion Risk ModelDDData DeficientEAAAEcologically Appropriate Area of AnalysisEBRDEuropean Bank for Reconstruction and DevelopmentEIAEnvironmental Impact AssessmentENEndangeredEUEuropean Union	Abbreviation	Definition
AZE       Alliance for Zero Extinction         BAP       Biodiversity Action Plan         BMMP       Biodiversity Management and Monitoring Plan         CHA       Critical Habitat Assessment         CITES       Convention for the International Trade in Endangered Species of Wild Fauna and Flora         CR       Critically Endangered         CRM       Collusion Risk Model         DD       Data Deficient         EAAA       Ecologically Appropriate Area of Analysis         EBRD       European Bank for Reconstruction and Development         EIA       Environmental Impact Assessment         EN       Endangered         EOO       Extent of Occurrence         ESIA       Environmental and Social Impact Assessment	AoA	Area of Analysis
BAP       Biodiversity Action Plan         BMMP       Biodiversity Management and Monitoring Plan         CHA       Critical Habitat Assessment         CITES       Convention for the International Trade in Endangered Species of Wild Fauna and Flora         CR       Critically Endangered         CRM       Collusion Risk Model         DD       Data Deficient         EAAA       Ecologically Appropriate Area of Analysis         EBRD       European Bank for Reconstruction and Development         EIA       Environmental Impact Assessment         EN       Endangered         EOO       Extent of Occurrence         ESIA       Environmental and Social Impact Assessment	Aol	Area of Influence
BMMP       Biodiversity Management and Monitoring Plan         CHA       Critical Habitat Assessment         CITES       Convention for the International Trade in Endangered Species of Wild Fauna and Flora         CR       Critically Endangered         CRM       Collusion Risk Model         DD       Data Deficient         EAAA       Ecologically Appropriate Area of Analysis         EBRD       European Bank for Reconstruction and Development         EIA       Environmental Impact Assessment         EN       Endangered         EOO       Extent of Occurrence         ESIA       Environmental and Social Impact Assessment	AZE	Alliance for Zero Extinction
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EN     Endangered       EOO     Extent of Occurrence       ESIA     Environmental and Social Impact Assessment	EBRD	European Bank for Reconstruction and Development
EOO     Extent of Occurrence       ESIA     Environmental and Social Impact Assessment	EIA	Environmental Impact Assessment
ESIA Environmental and Social Impact Assessment	EN	Endangered
	EOO	Extent of Occurrence
EU European Union	ESIA	Environmental and Social Impact Assessment
	EU	European Union
EUNIS European Nature Information System	EUNIS	European Nature Information System
GN Guidance Notes	GN	Guidance Notes
IAoI Indirect Area of Influence	ΙΑοΙ	Indirect Area of Influence
IBA Important Bird Area	IBA	Important Bird Area
IFC International Finance Cooperation	IFC	International Finance Cooperation
IUCN International Union for Conservation of Nature	IUCN	International Union for Conservation of Nature
JPM J.P. Morgan	JPM	J.P. Morgan
KBA Key Biodiversity Area	КВА	Key Biodiversity Area
LC Least Concern	LC	Least Concern
NT Near Threatened	NT	Near Threatened
PBF Priority Biodiversity Features	PBF	Priority Biodiversity Features
PR Performance Requirement	PR	Performance Requirement
PS Performance Standard	PS	Performance Standard
RAMSAR Convention on Wetlands of International Importance Especially as Waterfowl Habitat	RAMSAR	Convention on Wetlands of International Importance Especially as Waterfowl Habitat
VP Vintage Point	VP	Vintage Point
VU Vulnerable	VU	Vulnerable
WPP Wind Power Plant	WPP	Wind Power Plant

## **Executive summary**

CHA for Armutcuk WPP Project has been undertaken in line with IFC PS6 and corresponding GN to identify areas which are considered as critical habitats and critical habitats triggering species. The CHA presents the screening of biodiversity features and threatened wildlife, and plant species identified.

This report aims to identify Critical Habitat-qualifying biodiversity associated with the Project; Natural and Modified Habitat and identify the recommended next steps for the Project, including identification of data gaps and the need for additional field surveys. Thus, based on these aims literature searches, desktop and field studies were conducted, nationally and internationally recognized areas were considered within EAAA. In line with PS6 and corresponding GN, the critical habitats, critical habitat triggered species and important biodiversity features were determined considering that the critical habitats are areas with high biodiversity value, including (i) habitat of significant importance to CR and/or EN species; (ii) habitat of significant importance to endemic and/or restricted-range species; (iii) habitat supporting globally significant concentrations of migratory species and/or congregatory species; (iv) highly threatened and/or unique ecosystems; and/or (v) areas associated with key evolutionary processes within EAAA.

Due to a combination of uncertainties with the Project specific data and global and/or regional availability of relevant literature for some species, a high-level assessment was accomplished for the present CHA. This CHA study should be considered preliminary, as extensive additional baseline surveys have been scheduled in 2024 for flora, fauna, birds, bats and invertebrate species to enhance the baseline by addressing data quality and quantity. The CHA is expected to undergo significant revision after the data gaps have been bridged following the baseline collection.

In light of the assessment, two habitat types, three plant species, 6 bird species, 15 mammal species and one reptile species were categorised as PBF for a total of 27 PBF triggers

## **1** Introduction

## 1.1 Project Background

Enerjisa Üretim Santralleri Anonim Şirketi has been awarded to invest in the Çanakkale Connection Region on 30 May 2019 within the scope of "Renewable Energy Resource Areas (YEKA) Regulation" and Allocation of Wind Energy Based Renewable Energy Resource Areas (YEKA) and Total Connection Capacities" . Upon this award, a "YEKA Use Rights Agreement" was signed between Enerjisa Üretim Santralleri Anonim Şirketi and Ministry of Energy and Natural Resources (MoENR) on 09 March 2020. Subsequently, the "YEKA Use Rights Agreement" signed by Enerjisa Üretim Santralleri Anonim Şirketi for the Çanakkale Connection Region was transferred to Enerjisa Enerji Üretim Anonim Şirketi ("Enerjisa Üretim" or "the Project Company") with the transfer agreements signed on 03 June 2021.

Armutçuk WPP Project ("the Project") with 20 turbines and 84 MWm total installed power, is planned to be implemented by Enerjisa Üretim in Çanakkale Province, Yenice District, Armutçuk Neighbourhood and Balıkesir Province, Büyükşapçı Neighbourhood. The Project components consists of 20 turbines, a switchyard, Project roads (i.e., access and site roads), a 68.75 tonnes/hour capacity mobile crashing and screening facility (to be used as needed), as well as an energy transmission line (ETL) as a Project associate facility. The Project is part of a nine-project wind energy investment package initiated by Enerjisa Üretim which has a 750 MW total installed power from a total of 180 wind turbines located in the Aegean and Marmara Regions of western Türkiye; aiming to evaluate and utilize the wind energy potential of the region and contribute to the national strategy and regional economy.

## 1.2 Scope of the Study

This report includes CHA for Armutcuk WPP Project, that has been undertaken in line with IFC PS6 and corresponding GN to identify areas which are considered as critical habitats.

PS6 makes several stipulations for Critical Habitat, including achievement of a net gain for Critical Habitat-qualifying biodiversity. A net gain is required for all Critical Habitat features potentially affected by the Project. Where significant residual adverse effects are not predicted, additional conservation actions supported by qualitative evidence and expert opinion may be sufficient to substantiate a net gain. If, however, after the application of feasible preventive and restorative actions in the first steps of the mitigation hierarchy (avoid, mitigate, restore), there is a potentially significant residual impact on a Critical Habitat qualifying feature then ecological compensation (offset) is required with measurable conservation outcomes at an appropriate geographical scale. In Natural Habitat, no net loss, where possible, is required. A robust project specific ESIA baseline is vital, followed by an iterative and thorough application of the mitigation hierarchy to ensure that impacts are avoided, minimized and restored as far as feasible, reducing the significance of any residual impacts and the requirement for offsetting.

This report is a living document and hence, should be updated to reflect increased understanding of Project program and design throughout construction and operation (until agreed otherwise by Project Lenders) and should also be informed by new information as it becomes available (e.g., as obtained from ongoing/pre-construction surveys or as received from pertinent stakeholders).

## 2 Approach

In accordance with IFC PS6, habitats are divided into modified, natural and critical habitats. Critical habitats can be either modified or natural habitats supporting high biodiversity value, including:

- Habitat of significant importance to CR and/or EN species (IUCN Red List)
- Habitat of significant importance to endemic and/or restricted-range species
- Habitat supporting globally significant concentrations of migratory species and/or congregatory species
- Highly threatened and/or unique ecosystems
- Areas associated with key evolutionary processes

PS6 guides how to best identify three classes of area based on vegetation condition ('quality' or 'state'), and significance for biodiversity (see. Table 2-1). PS6 uses the term 'habitat' to refer to these areas, rather than the actual vegetation within them. These three area classed are (i) Modified Habitat; (ii) Natural Habitat; and (iii) Critical Habitat (with Critical Habitat a subset of Modified and Natural Habitat).

Habitat condition is classified as either Natural or Modified based on the extent of human modification of the ecosystem. Monoculture plantations, agricultural areas and urban areas are usually classed as Modified. Both Natural and Modified Habitats may contain globally important biodiversity values, thereby qualifying as Critical Habitat.

Areas Identified in PS6		Condition of the Area		
		Natural	Modified	
High Biodiversity	Present	Critical Habitat	Critical Habitat	
Values	Absent	Natural Habitat	Modified Habitat	

#### **Table 2-1 Habitat Classes**

Since habitat destruction is recognized as a major threat to the maintenance of biodiversity and to assess likely significance of impacts, IFC PS6 requires the following depending on habitat status:

**Modified habitats** are areas that may contain a large proportion of plant and/or animal species of non-native origin, and/or where human activity has substantially modified an area's primary ecological functions and species composition.

Modified habitats may include areas managed for agriculture, forest plantations, reclaimed coastal zones, and reclaimed wetlands.

PS6 applies to those areas of modified habitat that include significant biodiversity value, as determined by the risks and impacts identification process required in PS1. The client should minimize impacts on such biodiversity and implement mitigation measures as appropriate.

**Natural habitats** are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition.

The client will not significantly convert or degrade natural habitats, unless all of the following are demonstrated:

- No other viable alternatives within the region exist for development of the project on modified habitat;
- Consultation has established the views of stakeholders, including Affected Communities, with respect to the extent of conversion and degradation; and
- Any conversion or degradation is mitigated according to the mitigation hierarchy.

In areas of natural habitat, mitigation measures will be designed to achieve no net loss of biodiversity where feasible. Appropriate actions include:

- Avoiding impacts on biodiversity through the identification and protection of set asides,
- Implementing measures to minimize habitat fragmentation, such as biological corridors;
- Restoring habitats during operations and/or after operations; and
- Implementing biodiversity offsets

**Critical habitats** are areas with high biodiversity value, including (i) habitat of significant importance to CR and/or EN species; (ii) habitat of significant importance to endemic and/or restricted-range species; (iii) habitat supporting globally significant concentrations of migratory species and/or congregatory species; (iv) highly threatened and/or unique ecosystems; and/or (v) areas associated with key evolutionary processes.

- In areas of critical habitat, the client will not implement any project activities unless all of the following are demonstrated.
- No other viable alternatives within the region exist for development of the project on modified or natural habitats that are not critical;
- The project does not lead to measurable adverse impacts on those biodiversity values for which the critical habitat was designated, and on the ecological processes supporting those biodiversity values;
- The project does not lead to a net reduction in the global and/or national/regional population of any CR or EN species over a reasonable period of time; and
- A robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the client's management program.

In such cases where a client is able to meet the requirements defined above, the project's mitigation strategy will be described in a BAP and will be designed to achieve net gains of those biodiversity values for which the critical habitat was designated.

## 2.1 Applicable Guidelines and Standards

#### 2.1.1 National Requirements

The primary framework of the Turkish legislation for environmental legislation is the Environmental Law (Law No: 2872). National laws and regulations regarding protection of the habitats and species are listed in Table 2-2.

#### Table 2-2: National Legislation on Biodiversity

Legislation (Official Gazette Date/Number - Last Revision Date)	National Strategy Documents
Law on National Parks (11.08.1983/18132 - 09.07.2018) Terrestrial Hunting Law (11.07.2003/25165 - 28.10.2020) Law on Animal Protection (01.07.2004/25509 - 13.12.2010) Regulation on the Protection of Wetlands (04.04.2014/28962 - 23.06.2022) Regulation for Implementing the Convention on International Trade in EN Species of Wild Fauna and Flora (27.12.2001/24623 - 20.07.2019) Regulation on Protection of Wildlife and Wildlife Development Areas (08.11.2004/25637) Law on Protection of Cultural and Natural Assets (23.07.1983/18113 - 15.06.2022) Regulation on Collection, Protection and Usage of Plant Genetic	National Plan on on-site Protection of Plant Genetic Diversity (1998) National Environmental Action Plan (1999) National Forestry Program (2004) Climate Change Action Plan (2012) Turkish National Action Plan against Desertification (2015) National Rural Development Strategy (2015) National Biological Diversity Strategy
Resources (19.07.2012/28358) Law on Fisheries (04.04.1971/ 13799 - 17.02.2021)	and Action Plan (2019)
The Environmental Protection Agency for Special Areas (08.07.2011/ 27988)	
Environment Law (11.08.1983 / 18132 - 15.06.2022)	
Forestry Law (08.09.1956 / 9402 - 25.12.2021)	
Law on Pasture (28.02.1998 / 23272 - 18.01.2019)	
Law on Coastal Areas Management (17.04.1990 / 20495 - 28.10.2020)	

#### 2.1.2 International Requirements

International agreements, conventions, and protocols regarding protection of the habitats and species are listed below:

- The Convention for the Protection of the Mediterranean Sea Against Pollution (Barcelona Convention) (1981)
- The Convention on the Conservation of European Wildlife and Natural Habitats (BERN) (1984)
- United Nations Framework Convention on Climate Change (1994)
- The RAMSAR (1994)
- The UN Convention on Biological Diversity (1997) and Cartagena Protocol on Biosafety (2004)
- Kyoto Protocol (2009)
- The Convention on International Trade in EN Species of Wild Fauna and Flora (CITES) (1996)
- Paris Agreement (2016)

#### 2.1.3 **Project Standards**

The Project, which will be realized using the planned financing provided by a group of development finance institutions and commercial lenders, jointly "Project Lenders" and with partial coverage by the German ECA Euler Hermes Aktiengesellschaft ("EH"). The Project Company intends to develop the Project in alignment with the policy and requirements of the Lenders (i.e., EP IV, IFC and EBRD standards).

The international lender standards concerning biodiversity for the Project are represented by the IFC PS6and related GN6, EBRD PR6 and GN6 as well as Equator Principles IV (EP IV).

The impact assessment and CHA are carried out in accordance with the following international requirements:

- IFC PSs on Environmental and Social Sustainability,
- EBRD's Environmental and Social Policy and PRs
- IUCN Red List of Threatened Species
- The Birds Directive (2009/147/EC)
- The Habitats Directive (92/43/EEC10)
- Post-construction Bird and Bat Fatality Monitoring for Onshore Wind Energy Facilities in Emerging Market Countries - Good Practice Handbook (2023)

The IFC PS6 objectives can be listed as:

- To protect and conserve biodiversity,
- To maintain the benefits from ecosystem services,
- To promote the sustainable management of living natural resources through the adoption of practices that integrates conservation needs and development priorities.

Similarly, the EBRD PR6 objectives are as defined below:

- Protect and conserve biodiversity using a precautionary approach,
- Adopt the mitigation hierarchy in the design and implementation of projects with the aim of achieving no net loss, and where appropriate, a net gain of biodiversity,
- · Maintain ecosystem services, and
- Promote good international practice in the sustainable management and use of living natural resources.

### 2.2 Data Collection

The baseline collection methodology of this CHA relies primarily on desktop components which are detailed below and the data from field surveys conducted as part of National EIA. The Consultant conducted a brief site reconnaissance visit as well.

#### 2.2.1 Desktop Study

A desktop review of the study area comprises the major component of the present Biodiversity assessment. The desktop component was performed perusing the following:

- National EIA report (Flora and Fauna section)
- Relevant publicly available peer-reviewed literature
- White and grey literature
- Public biodiversity databases
  - eBird<sup>1</sup>,
  - European Breeding Bird Atlas<sup>2</sup>
  - iNaturalist<sup>3</sup>
  - Tramem<sup>4</sup>,
  - Trakel<sup>5</sup>,

<sup>2</sup> Retrieved November 28, 2023, from ebba2.info

<sup>&</sup>lt;sup>1</sup> URL: Ebird.org Last accessed: 28 November 2023

<sup>&</sup>lt;sup>3</sup> URL: Inaturalist.org Last accessed: 28 November 2023

<sup>&</sup>lt;sup>4</sup> URL: Tramem.org Last accessed: 28 November 2023

<sup>&</sup>lt;sup>5</sup> URL: Trakel.org Last accessed: 28 November 2023

- Trakus<sup>6</sup>,
- Movebank<sup>7</sup>
- Global Invasive species database<sup>8</sup>
- Bizimbitkiler<sup>9</sup>
- Satellite imagery and maps
- Opinions of local biodiversity experts (formal / informal)
- Internationally recognized areas
  - KBAs
  - IBAs
- IUCN Red List
- Nationally threatened species
- BERN convention and appendices
- EU Habitats Directive
  - Annex I habitats
  - Annex II/IV species

Baseline information on flora and fauna has been collected through ecological surveys conducted within the scope of the National EIA study. Accordingly, the timings of the field studies carried out are given below;

- Flora surveys conducted between 15-23 October 2021 (National EIA).
- Bat surveys were conducted in August 2021, September 2021, and October 2021 for a total of 6 day/nights (National EIA).
- For ornithological surveys, the site was visited between 18 August 17 October 2021 and 24 March – 7 April 2022, 15 times each period, for unknown effort duration. (National EIA).
- For terrestrial fauna (non-bat mammals, amphibians, reptiles), 15-23 October 2021. (National EIA).
- For honeybees and beekeeping, late autumn 2021 and early spring 2022 (National EIA).

#### 2.2.2 Field Surveys

Given the limited timescale, it was not possible to undertake the biodiversity baseline surveys during appropriate season before the completion of the CHA study. It was possible to conduct a brief site visit (one day) which can be described as a site reconnaissance visit.

On 03 October 2023, the Project area was partially visited by two biodiversity consultants of Mott MacDonald. The visit was partial due to the following reasons,

- Access and site roads are only partially accessible by all-terrain vehicle,
- Limited time was available to cover the site on foot,
- Given the constraints, the visit was intended not as an exhaustive site assessment but as a rapid evaluation.

Due to the seasonality (autumn), the visit only provided an opportunity for general observations about habitat characteristics, especially for birds and bats.

<sup>&</sup>lt;sup>6</sup> URL: Trakus.org Last accessed: 28 November 2023

<sup>&</sup>lt;sup>7</sup> URL: movebank.org Last accessed: 28 November 2023

<sup>&</sup>lt;sup>8</sup> URL: iucngisd.org Last accessed: 28 November 2023

<sup>&</sup>lt;sup>9</sup> URL: Bizimbitkiler.org.tr Last accessed: 28 November 2023

If some features were not observed by the Consultant during this visit, it does not necessarily indicate such features are not present and/or abundant.

## 2.3 Identification of Ecologically Appropriate Area of Analysis

The Project consists of 20 turbines and their pads, the site and access roads, the switchyard area and the entire length of the ETL and pylons. Although the ETL and pylons are owned and operated by TEIAS, the standards of Project Lenders include these structures, along with the site roads and access roads, in impact assessments and subsequent adaptive management and monitoring programmes.

The investigation into the region's ecology was carried out to define an EAAA to determine the presence of features that may qualify for Critical Habitat. The EAAA was identified at a scale indirect area of influence of the Project area, considering large-scale ecological processes. This approach ensures that all potential risks within the Project footprint and surrounding vicinity are taken into consideration.

The EAAA was defined using a combination of water catchments, topographic information, and legally protected areas and/or internationally recognized areas of high biodiversity value information. Species with a very specific distribution and ecological requirements were taken into account in defining the EAAA.

For the purposes of this CHA, the EAAA for flora and terrestrial fauna (amphibians, reptiles and non-bat mammals) was designated as the wider Kaz Mountains KBA borders. Further information regarding the KBA designation is provided under Section 3.1. The EAAA for flora and fauna encompasses an area of 1619 km<sup>2</sup>. The EAAA for flora and terrestrial fauna is shown on Figure 2-1.

For EAAA for birds and bats, the main consideration was bird migration since the Project is located near minor routes of the Dardanelles. Therefore, the wider Kaz Mountains KBA borders were considered again, and enhanced with a 20 km buffer which can account for the migrant species approaching from each side better. The EAAA for birds and bats encompasses an area of 2335 km<sup>2</sup> and is shown on Figure 2-2.

Within the EAAA, an Area of Influence of the Project on biodiversity values was designated. For flora species, since the main expected impact source is ground preparation during construction phase, and secondary impacts of habitat degradation during operation, the AoI was designated as extending 2 km from the Project footprint. A similar approach was taken for terrestrial fauna species (amphibians, reptiles, and non-bat mammals) however since these species are more mobile, the AoI was designated as extending 5 km from all Project components. For avifauna (birds and bats), which are highly mobile and migratory, and can utilize much larger territories, the extent of impact needs to be studied in a wider area. The primary expected impact source is due to interactions with moving and electrified Project components. Therefore, an AoI of 15 km was adopted. This AoI also ensures coverage of Project roads which are secondary sources of impact for avifauna. Project AoI for all taxa is shown on Figure 2-3.

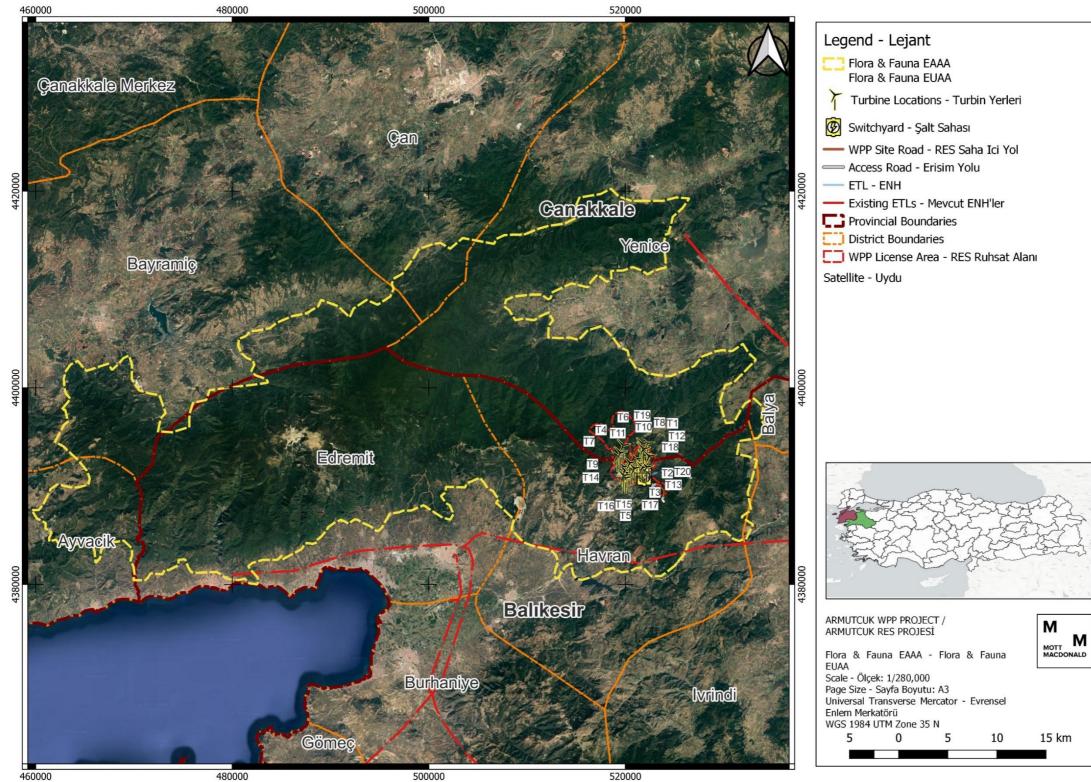


Figure 2-1: EAAA for Flora and Terrestrial Fauna for the Project



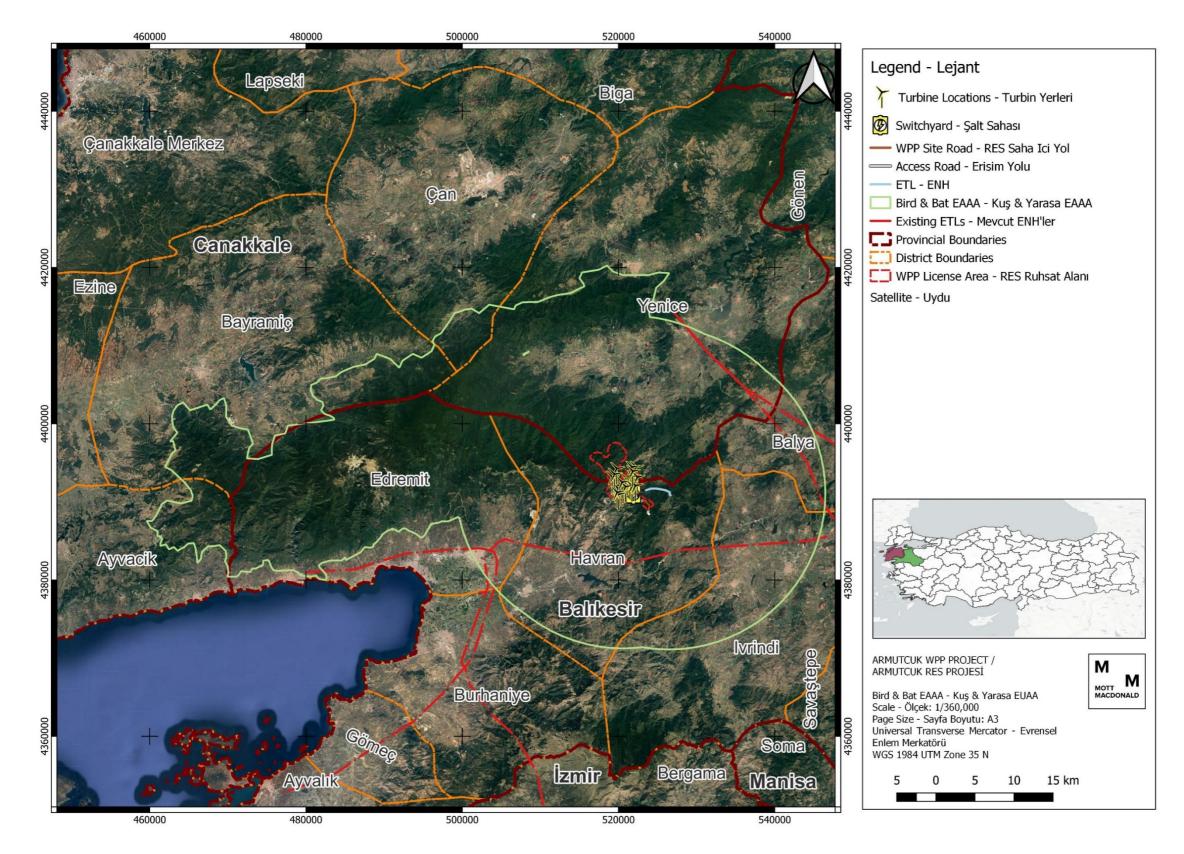


Figure 2-2: EAAA for Birds and Bats for the Project

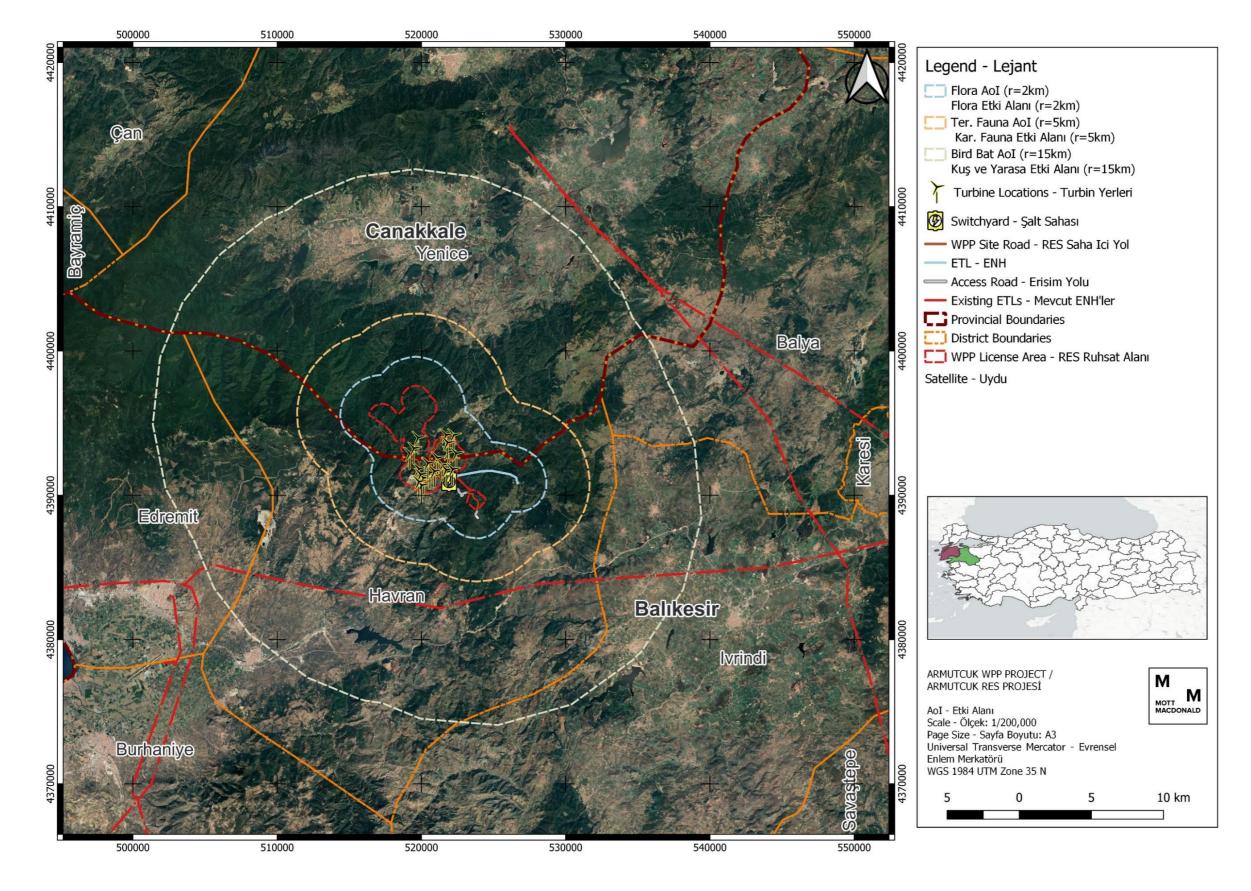


Figure 2-3: Aol for different biological taxa for the Project

## 2.4 Limitations and Assumptions

The consultant undertakes the CHA study given the following important caveats and limitations:

- Field survey duration: A very limited field survey was undertaken which can be described better as a field reconnaissance survey that lasted half a day. Given the limited timescale, it was not possible to undertake the biodiversity baseline surveys for appropriate duration or effort before the completion of the CHA. The visit was partial due to the following reasons,
  - Access and site roads are only partially accessible by all terrain vehicle,
  - No time was available to cover the site on foot.
- Field survey season: The season (autumn) of the reconnaissance survey was not very conducive to studying the biodiversity features of the Project. Only a general impression of the habitat characteristics was obtained.
- **3.** Field survey coverage: Only a limited portion of the Project site was able to be accessed. The entirety of the Project was not visited due to lack of vehicle accessible roads and lack of time to cover the area on foot.
- 4. **Desktop analysis:** The desktop component relies heavily on National EIA field studies at the Project area. However, the National EIA biodiversity surveys have deficiencies in meeting lender methodology and standards. One of the most significant deficiencies was pertaining to the Vantage Point surveys and Collision Risk Model. Additionally, Bat Activity Index is not available.
- CHA: Due to time constraints of the assessment process and the quality/quantity of the field data available from the National EIA study, only a high-level CHA can be conducted. Present CHA relies mainly on (1) Desktop components and (2) National EIA surveys which are only considered preliminary.
- 6. **Field surveys proposed:** Additional baseline collection was scheduled by the Project company for 2024 and will be incorporated into a major CHA revision.

## 2.5 Critical Habitat Assessment Criteria

A high-level screening was undertaken to identify the likely occurrence of species and habitats that could trigger Critical Habitat using the IFC PS6 GN6 (IFC, 2019). These species included IUCN CR and EN species, restricted-range and migratory/ congregatory species that were identified with IUCN geographic ranges within the EAAA. Likelihood of occurrence was evaluated based on consultation with local biodiversity specialists, landcover mapping, habitat preferences of the species etc.

Critical Habitat Criteria are as follows and should form the basis of any CHA:

- Criterion 1: CR and/or EN species
- Criterion 2: Endemic or restricted-range species
- Criterion 3: Migratory or congregatory species
- Criterion 4: Highly threatened and/or unique ecosystems
- Criterion 5: Key evolutionary processes

Projects that are located within internationally and/or nationally recognized areas of high biodiversity value may require a CHA. Examples include the following:

- Areas that meet the criteria of the IUCN's Protected Area Categories Ia, Ib and II,
- KBAs, which encompass IBAs and KBAs,
- UNESCO Natural and Mixed World Heritage Sites,
- Sites that fit the designation criteria of the AZE

Quantitative thresholds for triggering Critical Habitat for Criteria 1-4 are described in Table 2-3.

Criteria	Quantitative Thresholds
1. CR / EN Species	(a) Areas that support globally important concentrations of an IUCN Red-listed EN or CR species ( $\ge 0.5\%$ of the global population AND $\ge 5$ reproductive units of a CR or EN species).
	(b) Areas that support globally important concentrations of an IUCN Red-listed VU species, the loss of which would result in the change of the IUCN Red List status to EN or CR and meet the thresholds in GN72(a).
	(c) As appropriate, areas containing important concentrations of a nationally or regionally listed EN or CR species.
2. Endemic / Restricted- range Species <sup>10</sup>	(a) Areas that regularly hold $\ge$ 10% of the global population size AND $\ge$ 10 reproductive units of a species.
3. Migratory / Congregatory Species	(a) Areas known to sustain, on a cyclical or otherwise regular basis, ≥ 1 percent of the global population of a migratory or congregatory species at any point of the species' lifecycle.
	(b) Areas that predictably support $\ge$ 10 percent of the global population of a species during periods of environmental stress.
4. Highly Threatened / Unique Ecosystems	(a) Areas representing $\ge$ 5% of the global extent of an ecosystem type meeting the criteria for IUCN status of CR or EN.
	(b) Other areas not yet assessed by IUCN but determined to be of high priority for conservation by regional or national systematic conservation planning.

#### Table 2-3: Quantitative thresholds for triggering Critical Habitat for Criteria 1-4

#### **Criterion 1-3: Species Biodiversity Values**

In evaluating Armutcuk WPP biodiversity values for criterion 1-3, species demonstrated to regularly occur on site (confirmed through survey or considered likely to be present) were screened against the relevant criteria listed in the table above. Taking into consideration factors such as habitat suitability, movements patterns, foraging and breeding habits within the EAAA were assessed for each species to identify potential critical habitat triggers. Since the population size data of the species in the Project area is in the form of relative abundance for the flora species, the population data was evaluated accordingly.

Relative abundance is calculated by local abundance / dominance method using Braun-Blanquette and Pavillard cover percentage scale. The scale is given below:

٠	Abundant species, weak cover percentage	1
•	Abundant species or cover percentage more than 5%	2
•	Cover percentage between 25% and 50%	3
•	Cover percentage between 50% and 75%	4
•	Cover percentage between 75% and 100%	5

For bat species, since both Bat Activity Index is unavailable from the Project area (or a nearby comparable project), and population (global and regional) data are very limited, it is not feasible to undertake CHA based on population sizes and predicted impact on populations. Therefore, all available information was gathered for the species which were observed or clearly indicated in literature for the area, and Priority Biodiversity Feature designations were made based on assigning 1 point each for the following criteria: (1) conservation status is VU or higher, (2)

<sup>&</sup>lt;sup>10</sup> For terrestrial vertebrates and plants, restricted-range species are defined as those species that have an EOO less than 50,000 km<sup>2</sup>

For coastal, riverine, and other aquatic species in habitats that do not exceed 200 km width at any point (for example, rivers), restricted range is defined as having a global range of less than or equal to 500km linear geographic span (i.e., the distance between occupied locations furthest apart).

collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. Species which scored 2 or 3 were included as Priority biodiversity feature.

#### Criterion 4: Highly Threatened / Unique Ecosystems

A desk study was undertaken to identify if a formal IUCN Red List of Ecosystems assessment has been performed in the EAAA. Where no formal IUCN assessment has been undertaken, a search for national/regional level assessments, which use systematic methods, is undertaken and identified. The presence of Annex I priority habitats designated in the EU Habitats Directive was also considered in line with EBRD PR6.

#### **Criterion 5: Key Evolutionary Processes**

The structural attributes of a region, such as its topography, geology, soil, temperature, and vegetation, as well as combinations of these variables, can influence the evolutionary processes that give rise to regional configurations of species and ecological properties such as genetically unique populations or subpopulations of plant and animal species. Maintaining these key evolutionary processes inherent in a landscape as well as the resulting species (or subpopulations of species) is important for the conservation of genetic diversity. By conserving species diversity within a landscape, the processes that drive speciation, as well as the genetic diversity within species, ensure the evolutionary flexibility in a system.

The determination of critical habitat for Key Evolutionary Processes is determined qualitatively on a case-by-case basis and heavily reliant on scientific knowledge (IFC, 2019); therefore, a literature review would need to be undertaken as part of a full CHA to assess if the EAAA includes sites where key evolutionary processes occur for biodiversity values.

#### **Priority Biodiversity Features (PBF)**

PBF have a high, but not the highest, degree of irreplaceability and/or vulnerability. Although a level below critical habitat in sensitivity, they still require careful consideration during project assessment and impact mitigation.

EBRD PR6 defines PBF as including:

- threatened habitats,
- VU species,
- significant biodiversity features identified by a broad set of stakeholders or governments (such as KBAs or IBAs), and
- ecological structure and functions needed to maintain the viability of PBF.

## **3 Baseline Conditions**

## 3.1 Internationally Recognised and Nationally Protected Areas

Armutçuk WPP, including its roads, switchyard and ETL, is located within Kaz Mountains KBA. Kaz Mountains KBA is a highly valuable area for the biodiversity of Türkiye and has several trigger species including birds, fish, bats and plants, (*Pernis apivorus, Sitta krueperi, Squalius cii, Myotis capaccinii, Rhinolophus mehelyi, Allium kurtzianum, Bromus sipyleus, Crocus candidus, Festuca ustulata, Muscari latifolium*).

### 3.2 Habitats and Flora

The recorded habitats are listed in Table 3.1 below and shown Table 3.1, along with their wide distribution areas within the study area. The amount of habitat lost due to site roads, turbine footprints and switchyard area are given between Table 3-2 - Table 3.6.

Table 3.1: Habitat	Types of the Project Aol

Broad habitat type	EUNIS Habitat Type	Extend within Project Aol (ha)	Percentage (%)
	G3.5 Pinus nigra woodland	9066.5835	85.39%
	G4.B Mixed mediterranean pine - thermophilous	775.0972946	7.30%
Woodland	oak woodland		
	G5.5 Small mixed broadleaved and coniferous anthropogenic woodlands	169.5012645	1.60%
Agricultural	I1.3 Arable land with unmixed crops grown by low intensity agricultural methods	- 606.8865647	5.72%

#### **Table 3-2 Habitat Loss on Access Roads**

EUNIS	Area (ha)	Percentage
G3.5 Pinus nigra woodland	3.11	0.0343%
G4.B Mixed mediterranean pine - thermophilous oak woodland	0.00	0.0001%
G5.5 Small mixed broadleaved and coniferous anthropogenic woodlands	0.01	0.0051%
I1.3 Arable land with unmixed crops grown by low-intensity agricultural methods	0.00	0.0000%
Total	3.12	0.0%

#### Table 3-3 Habitat Loss on Site Roads

EUNIS	Area (ha)	Percentage
G3.5 Pinus nigra woodland	19.17	0.2114%
G4.B Mixed mediterranean pine - thermophilous oak woodland	0.06	0.0084%
G5.5 Small mixed broadleaved and coniferous anthropogenic woodlands	1.00	0.5890%
11.3 Arable land with unmixed crops grown by low-intensity agricultural methods	4.75	0.7832%
Total	24.98	

#### Table 3-4 Habitat Loss on Turbine Footprint

EUNIS	Area (ha)	Percen	itage
G3.5 Pinus nigra woodland	1	9.06	0.2103%
G4.B Mixed mediterranean pine - thermophilous oak woodland		0.08	0.0109%

G5.5 Small mixed broadleaved and coniferous anthropogenic woodlands	2.35	1.3852%
I1.3 Arable land with unmixed crops grown by low-intensity agricultural methods	8.79	1.4479%
Total	30.28	

#### Table 3-5 Habitat Loss on Switchyard Area

EUNIS	Area	Pe	rcentage
G3.5 Pinus nigra woodland		0.01	0.0001%
G4.B Mixed mediterranean pine - thermophilous oak woodland		0.10	0.0129%
G5.5 Small mixed broadleaved and coniferous anthropogenic woodlands		1.43	0.8422%
I1.3 Arable land with unmixed crops grown by low-intensity agricultural methods		0.00	0.0000%
Total		1.53	

#### Table 3.6: Habitat Loss on ETL

EUNIS	Area (ha)	Percentage	
G3.5 Pinus nigra woodland	40.68046	0.449%	
G4.B Mixed mediterranean pine - thermophilous oak woodland	12.18255	1.572%	
G5.5 Small mixed broadleaved and coniferous anthropogenic			
woodlands	0.808404	0.477%	
Total	53.67141		

A list of endemic species, based on all available information with their conservation status and whether they were encountered during field studies at the Project site is provided in National EIA. A total of 174 plant taxa were identified. The full list of species is not presented in this document, endemic species are listed with National Red List categories and locations in Table 3.7. Given these species have not yet been evaluated by IUCN, national red list categories have been used.

#### Table 3.7: The endemic species in the Project area and their coordinates

Та	xon	IUCN	Coordination
Re	gional Endemic Species		
1	Digitalis trojana	VU	35 S 521607 N 4393383 D
2	Cirsium balikesirense	VU	35 S 519848 N 4392488 D
			35 S 517307 N 4395335 D
			35 S 521607 N 4393383 D
			35 S 521870 N 4392596 D
			35 S 521609 N 4391784 D
			35 S 521432 N 4391320 D
			35 S 519926 N 4391407 D
			35 S 520143 N 4390876 D
3	Abies nordmanniana subsp. equi-trojana	EN	Literature
Wi	despread Endemic Species		
4	Campanula lyrata subsp. lyrata	LC	35 S 519710 N 4396656 D
No	n-Endemic Rare Species		
5	Cyclamen hederifolium	VU	35 S 519848 N 4392488 D

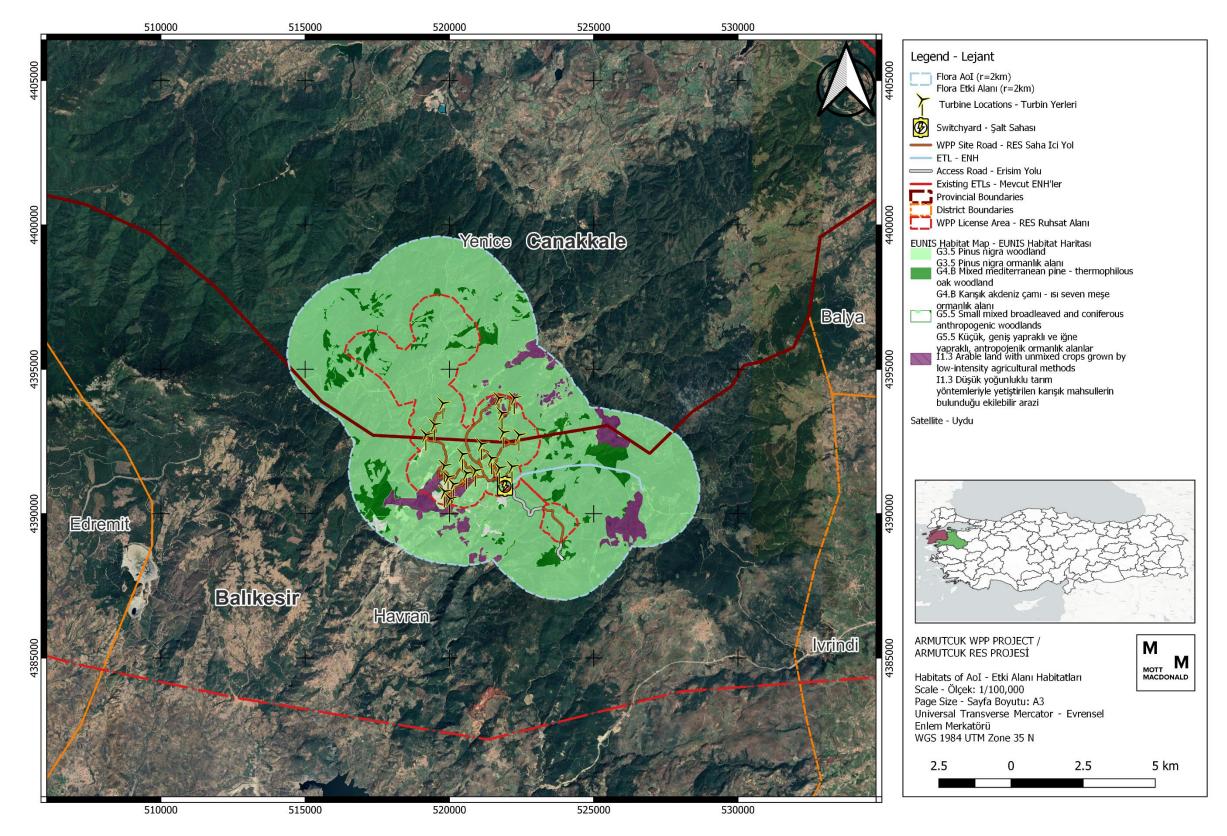


Figure 3.1:EUNIS Habitat Types of Aol



### 3.3 Birds

The Project area is located close to two minor migratory routes of birds, namely the Dardanelles route and the Aegean coast route <sup>1112</sup>. Three groups of bird species are specifically important for the site: (1) large soaring migratory species (storks, pelicans, eagles, buzzards, sparrowhawks, falcons, harriers, kites), (2) large soaring resident species and (3) other resident species of conservation significance. Target species are provided in Table 3-8.

Table 3-8: List of significant species, conservation status and whether they were
observed in National EIA or are indicated in literature (L/O) <sup>1314</sup> .

English name	Scientific name	IUCN	National	Bird directive	BERN	L/O*
Levant Sparrowhawk	Accipiter brevipes	LC	VU	Annex I	Appendix II	L
Northern Goshawk	Accipiter gentilis	LC	NT	-	Appendix II	0
Eurasian Sparrowhawk	Accipiter nisus	LC	NT	-	Appendix II	0
Cinereous Vulture	Aegypius monachus	NT	EN	Annex I	Appendix II	L
Golden Eagle	Aquila chrysaetos	LC	-	Annex I	Appendix II	0
Imperial Eagle	Aquila heliaca	VU	EN	Annex I	Appendix II	0
Gray Heron	Ardea cinerea	LC	-	-	Appendix III	0
Purple Heron	Ardea purpurea	LC	VU	Annex I	Appendix II	0
Eurasian Eagle-Owl	Bubo bubo	LC	-	Annex I	Appendix II	L
Common Buzzard	Buteo buteo	LC	-	-	Appendix II	0
Rough-legged Hawk	Buteo lagopus	LC	-	-	Appendix II	L
Long-legged Buzzard	Buteo rufinus	LC	NT	Annex I	Appendix II	0
White Stork	Ciconia ciconia	LC	-	Annex I	Appendix II	0
Black Stork	Ciconia nigra	LC	-	Annex I	Appendix II	0
Short-toed Snake-Eagle	Circaetus gallicus	LC	VU	Annex I	Appendix II	0
Eurasian Marsh-Harrier	Circus aeruginosus	LC	NT	Annex I	Appendix II	0
Hen Harrier	Circus cyaneus	LC	DD	Annex I	Appendix II	L
Pallid Harrier	Circus macrourus	NT	CR	Annex I	Appendix II	L
Montagu's Harrier	Circus pygargus	LC	EN	Annex I	Appendix II	0
Greater Spotted Eagle	Clanga clanga	VU	VU	Annex I	Appendix II	0
Lesser Spotted Eagle	Clanga pomarina	LC	EN	Annex I	Appendix II	0
Black-winged Kite	Elanus caeruleus	LC	-	Annex I	Appendix II	L
Lanner Falcon	Falco biarmicus	LC	VU	Annex I	Appendix II	L
Saker Falcon	Falco cherrug	EN	CR	Annex I	Appendix II	L
Merlin	Falco columbarius	LC	-	Annex I	Appendix II	L
Eleonora's Falcon	Falco eleonorae	LC	EN	Annex I	Appendix II	L

<sup>&</sup>lt;sup>11</sup> Uysal, İ., & Tosunoğlu, M., (2016). The Bird Migration Routes on the Gelibolu Peninsula and the Effects of Wind Energy Plants. 5th International Eurasian Ornithology Congress, Vol. V (pp.44). Çanakkale, Turkey

<sup>&</sup>lt;sup>12</sup> Erciyas Yavuz, K. 2014. Turkiye'deki Kus Hareketliligi Haritalari; movebank.org and eBird data.

<sup>&</sup>lt;sup>13</sup> Compiled from eBird, local EIA studies, studies at nearby wind farms and other grey literature.

<sup>&</sup>lt;sup>14</sup> National status: Kirwan, G., Demirci, B., Welch, H., Boyla, K., Özen, M., Castell, P., & Marlow, T. 2008. *The Birds of Turkey*.

English name	Scientific name IUCN National Bird directive		Bird directive	BERN	L/O*	
Lesser Kestrel	Falco naumanni	LC	VU	Annex I	Appendix II	L
Peregrine Falcon	Falco peregrinus	LC	VU	Annex I	Appendix II	0
Eurasian Hobby	Falco subbuteo	LC	-	-	Appendix II	0
Eurasian Kestrel	estrel Falco tinnunculus		-	-	Appendix II	0
Red-footed Falcon	n <i>Falco vespertinus</i> VU - Annex I		Annex I	Appendix II	0	
Bearded Vulture	Gypaetus barbatus	NT	EN	Annex I	Appendix II	L
Eurasian Griffon	Gyps fulvus	LC	EN	Annex I	Appendix II	0
White-tailed Eagle	Haliaeetus albicilla	LC	CR	Annex I	Appendix II	L
Booted Eagle	Hieraaetus pennatus	LC	VU	Annex I	Appendix II	0
Black Kite	Milvus migrans	LC	EN	Annex I	Appendix II	0
Red Kite	Milvus milvus	LC	DD	Annex I	Appendix II	L
Egyptian Vulture	Neophron percnopterus	EN VU		Annex I	Appendix II	0
Osprey	Pandion haliaetus	LC	DD	Annex I	Appendix II	L
Dalmatian Pelican	Pelecanus crispus	NT	VU	Annex I	Appendix II	L
Great White Pelican	Pelecanus onocrotalus	LC	EN	Annex I	Appendix II	0
European Honey- buzzard (KBA)	Pernis apivorus	LC	NT	Annex I	Appendix II	0
Eurasian Spoonbill	Platalea leucorodia	LC	EN	Annex I	Appendix II	L
Glossy Ibis	Plegadis falcinellus	LC	EN	Annex I	Appendix II	0
Krüper's Nuthatch <sup>15</sup>	Sitta krueperi	LC		Annex I	Appendix II	0
European Turtle-Dove	Streptopelia turtur	VU	VU	Annex II B	Appendix III	0
Tawny Owl	Strix aluco	LC	-	-	Appendix II	L
Redwing	Turdus iliacus	NT	-	Annex II B	Appendix III	L

\*L: Literature, O: Observation

### 3.4 Bats

A list of bat species, their conservation status, collision risk and whether they were observed in National EIA (O) or at other wind farms nearby / indicated in literature (L) are provided in Table 3-9.

## Table 3-9. List of bat species of the Project area with their conservation status and collision risk, and whether they were observed in the National EIA (L/O)

Common Name	Scientific Name	IUCN Global	IUCN EU	IUCN Med	BE RN	EU Habitat Directive	Collision Risk	L/O *
Western Barbastelle	Barbastella barbastellus	NT	VU	NT	I, II	II, IV	Medium	L
Serotine	Eptesicus serotinus	LC	-	-	II	IV	Medium	0
Savi's Pipistrelle	Hypsugo savii	LC	LC	LC	II	IV	High	0

<sup>15</sup> KBA trigger, regional endemic.

Common Name	Scientific Name	IUCN Global	IUCN EU	IUCN Med	BE RN	EU Habitat Directive	Collision Risk	<b>L/O</b> *
Schreiber's Bent- winged Bat	Miniopterus schreibersii	VU	-	-	I, II	II, IV	High	0
Alcathoe Bat	Myotis alcathoe	DD	-	-	П	IV	Low	L
Steppe Whiskered Bat	Myotis aurascens	LC	LC	LC	II	IV	Low	L
Bechstein's Myotis	Myotis bechsteinii	NT	VU	NT	I, II	II, IV	Low	0
Lesser Mouse- eared Myotis	Myotis blythii	LC	NT	NT	I, II	II, IV	Low	L
Long-fingered Bat	Myotis capaccinii	VU	VU	VU	I, II	II, IV	Low	L
Daubenton's Myotis	Myotis daubentonii	LC	-	-	П	IV	Low	0
Geoffroy's Bat	Myotis emarginatus	LC	LC	LC	I, II	II, IV	Low	L
Greater Mouse- eared Bat	Myotis myotis	LC	LC	LC	I, II	II, IV	Low	L
Whiskered Myotis	Myotis mystacinus	LC	LC	LC	П	IV	Low	L
Natterer's Bat	Myotis nattereri	LC	-	-	П	IV	Low	L
Giant Noctule	Nyctalus Iasiopterus	VU	DD	NT	II	IV	High	L
Lesser Noctule	Nyctalus leisleri	LC	LC	LC	П	IV	High	0
Noctule	Nyctalus noctula	LC	LC	LC	П	IV	High	0
Kuhl's Pipistrelle	Pipistrellus kuhlii	LC	LC	LC	П	IV	High	0
Nathusius' Pipistrelle	Pipistrellus nathusii	LC	LC	LC	II	IV	High	0
Common Pipistrelle	Pipistrellus pipistrellus	LC	-	-	III	IV	High	0
Soprano Pipistrelle	Pipistrellus pygmaeus	LC	LC	LC	II	IV	High	0
Brown Long-eared Bat	Plecotus auritus	LC	-	-	П	IV	Low	L
Grey Long-eared Bat	Plecotus austriacus	NT	NT	-	П	IV	Low	L
Mediterranean Long-eared Bat	Plecotus kolombatovici	LC	NT	LC	II	IV	Low	L
Mountain Long- eared Bat	Plecotus macrobullaris	LC	NT	NT	II	IV	Low	L
Blasius's Horseshoe Bat	Rhinolophus blasii	LC	VU	NT	I, II	II, IV	Low	L
Mediterranean Horseshoe Bat	Rhinolophus euryale	NT	VU	VU	I, II	II, IV	Low	L
Greater Horseshoe Bat	Rhinolophus ferrumequinum	LC	NT	NT	I, II	II, IV	Low	L
Lesser Horseshoe Bat	Rhinolophus hipposideros	LC	NT	NT	I, II	II, IV	Low	L
Mehely's Horseshoe Bat	Rhinolophus mehelyi	VU	VU	VU	I, II	II, IV	Low	L

Common Name	Scientific Name	IUCN Global	IUCN EU	IUCN Med	BE RN	EU Habitat Directive	Collision Risk	L/O *
European Free- tailed Bat	Tadarida teniotis	LC	LC	LC	II	IV	High	0
Particoloured Bat	Vespertilio murinus	LC	LC	-	II	IV	High	0

\*L: Literature, O: Observation

### 3.5 Terrestrial fauna (non-bat mammals, reptiles, amphibians)

A list of significant species is provided in Table 3-10.

## Table 3-10. List of significant terrestrial fauna for the Project area and whether they were observed in the National EIA (L/O)

Common Name	Scientific Name	IUCN	BERN	Habitats directive	L/O*
Common tortoise	Testudo graeca	VU	Appendix I-II	Appendix II-IV	0
Roe deer	Capreolus capreolus	LC	Appendix III	-	0
Mouse-tailed dormouse	Myomimus roachi	VU	Appendix I- II-III	Appendix II-IV	L
Marbled polecat	Vormela peregusna	VU	Appendix I-II	Appendix II-IV	L
Brown Bear	Ursus arctos	LC	Appendix I-II	Appendix II-IV	L

\*L: Literature, O: Observation

### 3.6 Freshwater fish

Surveys were not carried out for freshwater fish species during the field reconnaissance or for National EIA studies. Therefore, field observation data pertaining to fish species Marmara Chub (*Squalius cii*), which is a KBA trigger for Kaz Mountains and a regional endemic, at the Project is not available. Based on literature review, the species can inhabit intermittent (temporary) streams and has records from Lesbos Island, permanently interrupted streams in Biga Peninsula<sup>16</sup>, and streams draining into Southern Marmara.<sup>17</sup> Based on the hydrology report of the National EIA there are running and intermittent streams within the AoI which indicates this species for the site. Marmara Chub (*Squalius cii*) has most recently been assessed for The IUCN Red List of Threatened Species in 2013 and is listed as LC. Therefore the species was scoped out.

### 3.7 Invertebrates

Ottoman's Copper (*Lycaena ottomana*) is VU globally according to its arguably dated assessment in IUCN in 2000. Its habitat preference is low altitude, coastal maquis and woodland clearings in the region, favouring wet valley floors. Its preferred host species is *Rumex* genus, which is widespread and common. The most recent assessment for the species for the Mediterranean is more recent (IUCN 2013) which is LC, and the species conservation

<sup>&</sup>lt;sup>16</sup> Partal, N. & Yalçın Özdilek, Ş. (2022). The Gut Contents of the Squalius cii in a Permanently Interrupted River System, the Karamenderes River . Natural and Engineering Sciences , 7 (1) , 50-66 . DOI: 10.28978/nesciences.1098670

<sup>17</sup> https://fishbase.mnhn.fr/summary/63478

status nationally is currently being updated by the foremost butterfly experts of Turkiye, due to recent studies establishing its populations are robust and the species is common (in litt).

Big-Bellied Glandular Bush-Cricket is found in forest, scrub and grassland habitats at altitudes ranging from 0 to 1,270 metres. The species inhabits steppe-like habitats dominated by xeric grasses and sparse scrub, in some areas like the Aegean coast of Anatolia it enters Mediterranean vegetation, such as sparse xerothermic oak forests or scrub or mesoxeric grass associations. The species prefers sparse vegetation cover areas in terms of forest and shrub areas. The Project AoI does not include these type of vegetation cover.

## 4 Critical Habitat Assessment

Evaluation against each criterion is carried out in table format which includes potential trigger species, their IUCN status, relation to the Project AoA, observation status in the AoA and summary of findings. Potential species were selected in line with the CHA Criteria from literature and survey findings. For Criterion 1 to 3, in case of the limited information to estimate numbers of individuals of potentially qualifying species within the AoA, expert opinion has been applied to evaluate the importance of the identified potential Critical Habitat in terms of global populations. The EOO of species has been applied as a surrogate for local population data. This means that a precautionary approach was applied in the evaluation against PS6 thresholds. Global EOO information was obtained from the IUCN Red List Database which covers all of the potential Critical Habitat trigger species. In some cases, the presence of species in the AoA has been inferred based on habitat suitability and in cases where presence has been confirmed, the distribution within the species range and project AoA has been assumed. This results in a conservative Critical Habitat evaluation.

## 4.1 Criteria 1-3: Species Biodiversity Values

For Criterion 1, CR, EN and VU species were examined whether the Project area supports more than 0.5% globally important concentrations of these species or whether the Project could lead to a decrease in population of species categorized as VU. For this examination, both national and international categories of these species were considered. For Criterion 3, migratory species were examined whether the Project area sustains more than 1% of global population in a regular basis or whether the area supports more than 10% of the global population of the species during environmental stress period. Estimations for criterion 3 are based on more comprehensive Vantage Point counts conducted at nearby wind farms with comparable locations (with respect to migratory routes for migrants) and habitat characteristics (for residents) by The Consultant. To arrive at a rough estimate, total daylight hours in a year (for residents) and total daylight hours in both migratory periods (for migrants) was taken into consideration.

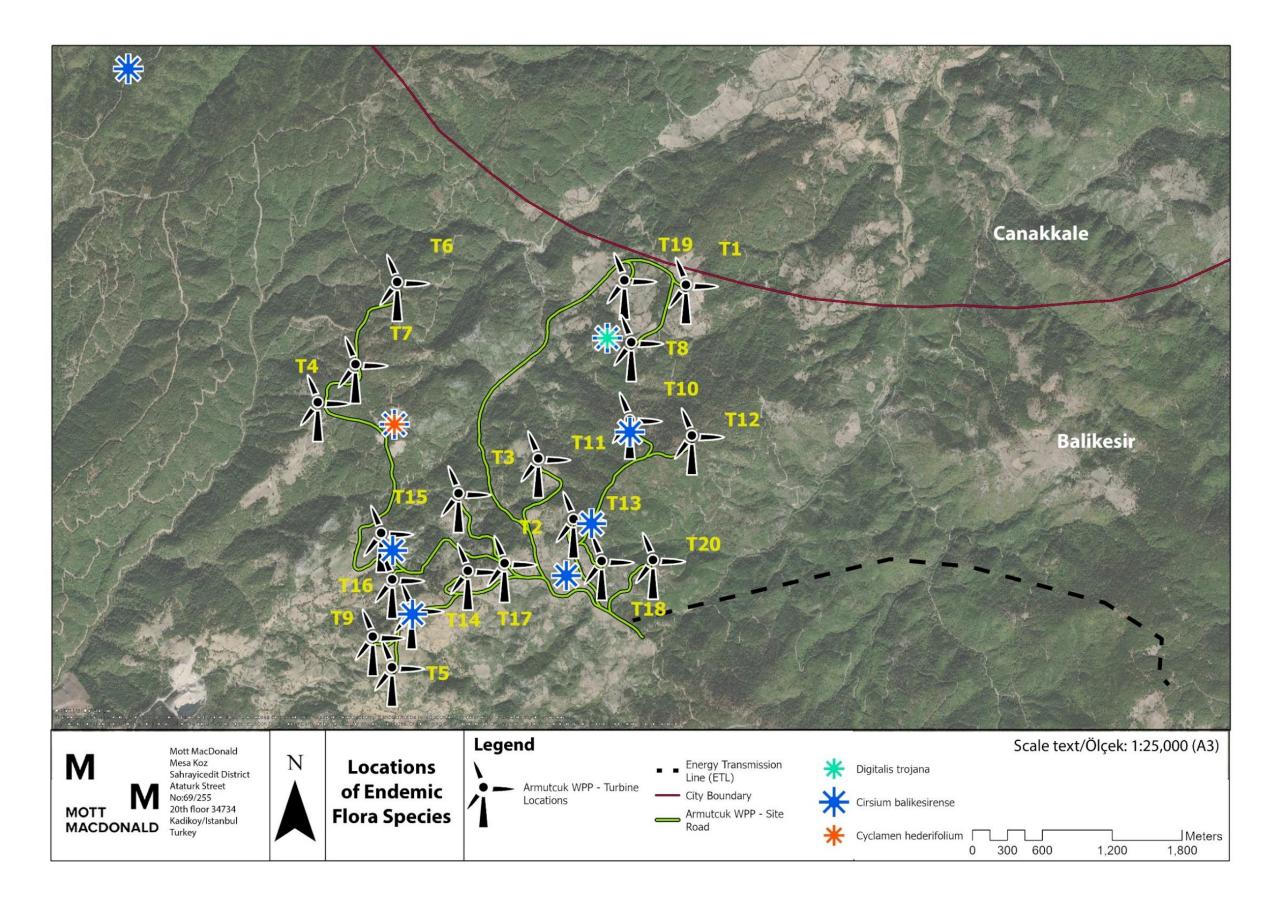
The global population, the EOO and the Project area were considered to estimate the global range of species in AoI to assign Critical Habitat trigger status of species based on Criterion 1 and 3. When the observed number of species was unknown or species information was obtained from literature; the global population, the EOO and the Project area were considered to estimate the global range of species in AoI to assign Critical Habitat trigger status of species based on Criterion 1 and 3. Otherwise, the observed individual numbers were used to estimate migrant population on an annual basis and compared with the global population to design Critical Habitat trigger status.

For bat species, since both Bat Activity Index is unavailable from the Project area (or a nearby comparable project), and population (global and regional) data are very limited, it is not feasible to undertake CHA based on population sizes and predicted impact on populations. Therefore, all available information was gathered for the species which were observed or clearly indicated in literature for the area, and Priority Biodiversity Feature designations were made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. Species which scored 2 or 3 were included as Priority Biodiversity Feature (PBF) (Table 4-3).

For plant species, since global population and population data within the AoI were not available, the Braun-Blanquet cover percentage scale data used by the flora expert in the National EIA process were used in the approach.

Scientific Name	IUCN/ National Red List	BERN	Extent of Occurrence (EOO) (km <sup>2</sup> )*	L/ O	Evaluation	CH Trigger or Priority Biodiversity Feature (PBF)
Digitalis trojana	VU	-	-	0	Given the species was observed during field studies, it can be considered as critical habitat trigger species. However, this assessment is difficult as the lack of knowledge about the population status. The only information of population status of the species is cover percentage between 5% and 25% at the Project Aol. It was assumed that it would be not a critical habitat trigger under Criterion 1b but priority biodiversity feature under Criterion 2a as the species is not local but reginal endemic.	PBF
Cirsium balikesirense	VU	-	-	0	Given the species was observed during field studies, it can be considered as critical habitat trigger species. However, this assessment is difficult as the lack of knowledge about the population status. The only information of population status of the species is cover percentage between 5% and 25% at the Project AoI. It was assumed that it would be not a critical habitat trigger under Criterion 1b but priority biodiversity feature under Criterion 2a as the species is not local but reginal endemic.	PBF
Cyclamen hederifolium	VU	-	-	0	Given the species was observed during field studies, it can be considered as critical habitat trigger species. However, this assessment is difficult as the lack of knowledge about the population status. The only information of population status of the species is cover percentage between 5% and 25% at the Project Aol. It was assumed that it would be not a critical habitat trigger but priority biodiversity feature under Criterion 2 as the species is rare for Türkiye.	PBF
Abies nordmanniana subsp. equi- trojana	EN	-	-	L	The species was not observed during field studies and is not found in the Project area according to the Management records of the General Directorate of Forestry.	Not Trigger

## Table 4.1: Plant Species CHA - Criteria 1-2



### Figure 4.1: Locations of Target Flora Species

#### Table 4-2: CHA for Bird Species depends on Criteria 1-3

Common Name	Scientific name	IUCN	Nat. Red List	Bird Directive	BERN	Global Population	Population Status	Estimated EOO (km²)	Observed individuals	Estimated birds/year	Cr 1,3 %Global Range in AoA	Evaluation	CH Trigger or Not
Northern Goshawk	Accipiter gentilis	LC	NT	-	II	100000- 2499999	Unknown	113000000	5	10	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 10. For Cr3, the EAAA should support 10000 individuals, so the species does not qualify for this criteria.	Not trigger
Eurasian Sparrowhawk	Accipiter nisus	LC	NT	-	II	200000- 3200000	Stable	54400000	28	41	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 41. For Cr3, the EAAA should support 20000 individuals, so the species does not qualify for this criteria.	Not trigger
Golden Eagle	Aquila chrysaetos	LC	-	I	II	85000-160000	Stable	139000000	7	7	0.01	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 7. For Cr3, the EAAA should support 850 individuals, so the species does not qualify for this criteria.	Not trigger
Imperial Eagle	Aquila heliaca	VU	EN	Ι	II	2500-9999	Decreasing	14900000	3	3	0.12	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 3. For Cr3, the EAAA should support 25 individuals, so the species does not qualify for this criteria. The nearest nest is in Gelibolu Peninsula outside of the EAAA, and the rest of the resident range of the species is Thracian Turkiye. PBF was designated as a precaution since a high number was recorded in National EIA, due to its national conservation significance and propensity for mortality at WPPs. Assessment to be reconsidered after 2024 baseline.	PBF
Gray Heron	Ardea cinerea	LC	-	-	III	500000-2500000	Unknown	136000000	40	59	0.01	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 59. For Cr3, the EAAA should support 5000 individuals, so the species does not qualify for this criteria.	Not trigger
Purple Heron	Ardea purpurea	LC	VU	I	II	180000-380000	Decreasing	10900000	1	2	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 2. For Cr3, the EAAA should support 1800 individuals, so the species does not qualify for this criteria.	Not trigger
Common Buzzard	Buteo buteo	LC	-	-	II	200000- 3500000	Increasing	33500000	196	574	0.03	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 574. For Cr3, the EAAA should support 20000 individuals, so the species does not qualify for this criteria.	Not trigger
Long-legged Buzzard	Buteo rufinus	LC	NT	I	II	100000-499999	Stable	32300000	18	27	0.03	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 27. For Cr3, the EAAA should support 1000 individuals, so the species does not qualify for this criteria.	Not trigger
White Stork	Ciconia ciconia	LC	-	I	II	700000-704000	Increasing	52700000	268	523	0.07	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 523. For Cr3, the EAAA should support 7000 individuals, so the species does not qualify for this criteria.	Not trigger
Black Stork	Ciconia nigra	LC	-	I	II	24000-44000	Unknown	25100000	22	22	0.09	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 22.	Not trigger

Common Name	Scientific name	IUCN	Nat. Red List	Bird Directive	BERN	Global Population	Population Status	Estimated EOO (km²)	Observed individuals	Estimated birds/year	Cr 1,3 %Global Range in AoA	Evaluation	CH Trigger or Not
												For Cr3, the EAAA should support 240 individuals, so the species does not qualify for this criteria.	
Short-toed Snake-Eagle	Circaetus gallicus	LC	VU	I	II	50000-999999	Stable	48800000	64	188	0.38	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 188. For Cr3, the EAAA should support 500 individuals, so the species does not qualify for this criteria.	Not trigger
Eurasian Marsh-Harrier	Circus aeruginosus	LC	NT	Ι	II	600000-1100000	Stable	24800000	16	24	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 24. For Cr3, the EAAA should support 6000 individuals, so the species does not qualify for this criteria.	Not trigger
Montagu's Harrier	Circus pygargus	LC	EN	I	II	300000-550000	Decreasing	18000000	2	3	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 3. For Cr3, the EAAA should support 3000 individuals, so the species does not qualify for this criteria.	Not trigger
Greater Spotted Eagle	Clanga clanga	VU	VU	I	II	3900-10000	Decreasing	15300000	1	2	0.05	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 2. For Cr3, the EAAA should support 39 individuals, so the species does not qualify for this criteria.	Not trigger
Lesser Spotted Eagle	Clanga pomarina	LC	EN	I	II	40000-60000	Stable	6550000	114	334	0.84	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 334. For Cr3, the EAAA should support 400 individuals, so the species does not qualify for this criteria. Number of individuals estimated do not qualify the species for Cr1c.	Not trigger
Peregrine Falcon	Falco peregrinus	LC	VU	I	II	100000-499999	Increasing	413000000	8	12	0.01	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 12. For Cr3, the EAAA should support 1000 individuals, so the species does not qualify for this criteria.	Not trigger
Eurasian Hobby	Falco subbuteo	LC	-	-	II	900000-1500000	Decreasing	49300000	23	34	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 34. For Cr3, the EAAA should support 9000 individuals, so the species does not qualify for this criteria.	Not trigger
Eurasian Kestrel	Falco tinnunculus	LC	-	-	II	4300000- 6700000	Decreasing	106000000	73	107	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 107. For Cr3, the EAAA should support 43000 individuals, so the species does not qualify for this criteria.	Not trigger
Red-footed Falcon	Falco vespertinus	VU	-	I	II	287500-400000	Decreasing	3360000	11	22	0.01	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 22. For Cr3, the EAAA should support 2875 individuals, so the species does not qualify for this criteria. Favourable conditions for hunting opportunities during migration can direct high numbers of individuals to certain areas, these conditions are generally unpredictable (season, weather, availability of prey). Given the species global conservation status, PBF designation was made.	PBF

Common Name	Scientific name	IUCN	Nat. Red List	Bird Directive	BERN	Global Population	Population Status	Estimated EOO (km²)	Observed individuals	Estimated birds/year	Cr 1,3 %Global Range in AoA	Evaluation	CH Trigger or Not
Eurasian Griffon	Gyps fulvus	LC	EN	I	II	80000-900000	Increasing	20400000	5	6	0.01	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Since the National EIA count is a regionally high count, estimated number of individuals supported throughout the year is 6. For Cr3, the EAAA should support 800 individuals, so the species does not qualify for this criteria.	Not trigger
Booted Eagle	Hieraaetus pennatus	LC	VU	1	II	150000-195000	Stable	6200000	20	39	0.03	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 39. For Cr3, the EAAA should support 1500 individuals, so the species does not qualify for this criteria.	Not trigger
Black Kite	Milvus migrans	LC	EN	1	II	400000- 5700000	Stable	115653659	64	94	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 94. For Cr3, the EAAA should support 40000 individuals, so the species does not qualify for this criteria.	Not trigger
Egyptian Vulture	Neophron percnopterus	EN	VU	I	II	12400-36000	Decreasing	50100000	7	8	0.06	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 8. For Cr3, the EAAA should support 124 individuals, so the species does not qualify for this criteria. Due to the species' conservation status, PBF was designated.	PBF
Great White Pelican	Pelecanus onocrotalus	LC	EN	I	II	265000-295000	Unknown	51200000	11	22	0.01	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 22. For Cr3, the EAAA should support 2650 individuals, so the species does not qualify for this criteria.	Not trigger
European Honey-buzzard	Pernis apivorus	LC	NT	I	II	290000-430000	Stable	18200000	54	106	0.04	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 106. For Cr3, the EAAA should support 2900 individuals, so the species does not qualify for this criteria. PBF was designated due to national conservation and KBA trigger status.	PBF
Krüper's Nuthatch	Sitta krueperi	LC	(Regio nal ende mic)	I	II	241000-901000	Stable	895000	-	-	-	The EAAA should support at least 10 percent of global population of species to have Critical Habitat trigger species based on Criteria 2. Thus, the EAAA should support 24100 individuals, considering its global population. Species density was not quantified in breeding bird surveys; however, it is not seen likely that AoA should support this amount. However, given the lack of breeding bird survey data, its regional endemism, that the species was observed during field visit, and its KBA trigger status, species was designated PBF as a precautionary approach.	PBF
European Turtle-Dove	Streptopelia turtur	VU	VU	II B	III	12800000- 47600000	Decreasing	7080000	40	59	0.00	The EAAA should support at least 1 percent of global population of species to have Critical Habitat trigger species based on Criteria 3. Estimated number of individuals supported throughout the year is 59. For Cr3, the EAAA should support 128000 individuals, so the species does not qualify for this criteria. PBF was designated due to global conservation significance. Designation should be reconsidered after 2024 baseline which is likely to confirm that the Project AoI is not significant for migratory or breeding activity.	PBF

#### Table 4-3.CHA for Bat Species depends on Criteria 1-3

Common Name	Scientific Name	IUCN Glob.	IUCN Eu	IUCN Med	Bern	EU Habitat Directive	L/ 0	Coll. Risk	Migratory status	Pop. Status	Global Pop.	Estimated EOO (km2)	Cr 1,3 %Global Range in AoA	Score	
Western Barbastelle	Barbastella barbastellus	NT	VU	NT	I, II	II, IV	L	Medium	Mostly sedentary	Declining	Unknown	12455378	-	0.5	1
Anatolian Serotine	Eptesicus anatolicus	LC	-	-	II	IV	L	Medium	Sedentary	Unknown	Unknown	Unknown	-	0.5	1
Serotine	Eptesicus serotinus	LC	-	-	I, II	IV	0	Medium	Mostly sedentary	Stable	Unknown	Unknown	-	0.5	1
Savi's Pipistrelle	Hypsugo savii	LC	LC	LC	II	IV	0	High	Probably migrant	Stable	Unknown	15658670	-	2	
Schreiber's Bent- winged Bat	Miniopterus schreibersii	VU	-	-	I, II	II, IV	0	High	Mid and long- range migrant	Declining	Unknown	19946710	-	3	
Alcathoe Bat	Myotis alcathoe	DD	-	-	I, II	IV	L	Low	-	Unknown	Unknown	2860473	-	0	1
Steppe Whiskered Bat	Myotis aurascens	LC	LC	LC	I, II	IV	L	Low	-	Stable	Unknown	4766158	-	0	1
Bechstein's Myotis	Myotis bechsteinii	NT	VU	NT	I, II	II, IV	0	Low	Mostly sedentary	Declining	Unknown	6640673	-	0	1
Lesser Mouse- eared Myotis	Myotis blythii	LC	NT	NT	II	II, IV	L	Low	Mostly sedentary	Declining	Unknown	23471950	-	0	I
Long-fingered Bat	Myotis capaccinii	VU	VU	VU	II	II, IV	L	Low	Mid-range seasonal migrant	Declining	Unknown	5387022	-	2	4 0 0 1 1 1
Daubenton's Myotis	Myotis daubentonii	LC	-	-	II	IV	0	Low	Facultative migrant	Stable	Unknown	Unknown	-	1	1
Geoffroy's Bat	Myotis emarginatus	LC	LC	LC	II	II, IV	L	Low	Mostly sedentary	Stable	Unknown	15654608	-	0	1
Greater Mouse- eared Bat	Myotis myotis	LC	LC	LC	III	II, IV	L	Low	Mid-range migrant	Stable	Unknown	7071111	-	1	1
Whiskered Myotis	Myotis mystacinus	LC	LC	LC	II	IV	L	Low	Mostly sedentary	Unknown	Unknown	13823224	-	0	1
Natterer's Bat	Myotis nattereri	LC	-	-	II	IV	L	Low	Facultative migrant	Stable	Unknown	16030693	-	1	1
Giant Noctule	Nyctalus lasiopterus	VU	DD	NT	I, II	IV	L	High	Long distance migrant	Declining	0-9999	8955906	-	3	4

<sup>18</sup> Hutterer, Rainer & Ivanova, T. & Meyer-Cords, C.H. & Rodrigues, Luisa. (2005). Bat migration in europe. A review of banding data and literature. Federal Agency for Nature Conservation.

Evaluation CH/PBF
Not trigger
Not trigger
Not trigger
Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as <b>PBF</b> .
Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 3, it will be considered as <b>PBF</b> .
Not trigger
Not trigger
Not trigger
Not trigger
Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as <b>PBF</b> .
Not trigger
Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2)

Common Name	Scientific Name	IUCN Glob.	IUCN Eu	IUCN Med	Bern	EU Habitat Directive	L/ 0	Coll. Risk	Migratory status	Pop. Status	Global Pop.	Estimated EOO (km2)	Cr 1,3 %Global Range in AoA	Score	Evaluation CH/PBF
															collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 3, it will be considered as <b>PBF.</b>
Lesser Noctule	Nyctalus leisleri	LC	LC	LC	I, II	IV	0	High	Long distance migrant	Unknown	Unknown	20171114	-	2	Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as <b>PBF</b> .
Noctule	Nyctalus noctula	LC	LC	LC	I, II	IV	0	High	Long distance migrant	Unknown	Unknown	24101079	-	2	Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as <b>PBF</b> .
Kuhl's Pipistrelle	Pipistrellus kuhlii	LC	LC	LC	II	IV	0	High	Sedentary	Unknown	Unknown	51385949	-	1	Not trigger
Nathusius' Pipistrelle	Pipistrellus nathusii	LC	LC	LC	II	IV	0	High	Long distance migrant	Unknown	Unknown	11175990	-	2	Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as <b>PBF</b> .
Common Pipistrelle	Pipistrellus pipistrellus	LC	-	-	II	IV	0	High	Long distance migrant	Stable	Unknown	Unknown	-	2	Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as PBF.
Soprano Pipistrelle	Pipistrellus pygmaeus	LC	LC	LC	II	IV	0	High	Probably migrant	Unknown	Unknown	10673041	-	2	Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as PBF.
Brown Long- eared Bat	Plecotus auritus	LC	-	-	II	IV	L	Low	Sedentary	Stable	Unknown	12039091	-	0	Not trigger
Gray Long-eared Bat	Plecotus austriacus	NT	NT	0	II	IV	L	Low	Sedentary	Declining	Unknown	6047987	-	0	Not trigger
Mediterranean Long-eared Bat	Plecotus kolombatovici	LC	NT	LC	II	IV	L	Low	Sedentary	Declining	Unknown	Unknown	-	0	Not trigger
Mountain Long- eared Bat	Plecotus macrobullaris	LC	NT	NT	II	IV	L	Low	Sedentary	Declining	Unknown	4767971	-	0	Not trigger
Blasius's Horseshoe Bat	Rhinolophus blasii	LC	VU	NT	II	II, IV	L	Low	Mostly sedentary	Declining	Unknown	8849478	-	0	Not trigger
Mediterranean Horseshoe Bat	Rhinolophus euryale	NT	VU	VU	II	II, IV	L	Low	Sedentary	Declining	Unknown	10858126	-	0	Not trigger

Common Name	Scientific Name	IUCN Glob.	IUCN Eu	IUCN Med	Bern	EU Habitat Directive	L/ O	Coll. Risk	Migratory status	Pop. Status	Global Pop.	Estimated EOO (km2)	Cr 1,3 %Global Range in	Score	E
Greater Horseshoe Bat	Rhinolophus ferrumequinum	LC	NT	NT	II	II, IV	L	Low	Mostly sedentary	Declining	Unknown	Unknown	AoA -	0	N
Lesser Horseshoe Bat	Rhinolophus hipposideros	LC	NT	NT	II	II, IV	L	Low	Mostly sedentary	Declining	Unknown	22157273	-	0	Ν
Mehely's Horseshoe Bat	Rhinolophus mehelyi	VU	VU	VU	II	II, IV	L	Low	Mostly sedentary	Declining	Unknown	18885688	_	1	⊢ s p d
European Free- tailed Bat	Tadarida teniotis	LC	LC	LC	II	IV	0	High	Probably sedentary	Unknown	Unknown	18885688	-	1	Ν
Particoloured Bat	Vespertilio murinus	LC	LC	-	II	IV	0	High	Long distance migrant	Stable	Unknown	25697109	-	2	A

#### Table 4-4 CHA for Terrestrial Fauna Species depends on Criteria 1-3

Common Name	Scientific Name	IUCN	BERN	Habitats directive	L/O	Global Population	Population Status	Estimated EOO (km2)	Cr 1,3 %Global Range in AoA	Evaluation	CH/PBF
Common tortoise	Testudo graeca	VU	Appendix I-II	Appendix II-IV	0	Unknown	Unknown	Unknown	-	Due to the lack of information on the population status of the species, it is difficult to provide an assessment of whether the species critical habitat trigger or not. Since the IUCN category is VU, it has been evaluated as a priority biodiversity feature under Criterion 1b.	PBF
Marbled Polecat	Vormela peregusna	VU	Appendix II	II, IV	L	Unknown	Decreasing	>20,000	-	Due to the lack of information on the population status of the species, it is difficult to provide an assessment of whether the species critical habitat trigger or not. Since the IUCN category is VU and population status is decreasing, it has been evaluated as a priority biodiversity feature under Criterion 1b.	PBF
Mouse-tailed dormouse	Myomimus roachi	VU	Appendix I-II-III	Appendix II-IV	L	Unknown	Decreasing	63559	-	Due to the lack of information on the population status of the species, it is difficult to provide an assessment of whether the species critical habitat trigger or not. Since the IUCN category is VU and population status is decreasing, it has been evaluated as a priority biodiversity feature under Criterion 1b.	PBF
Roe deer	Capreolus capreolus	LC	Appendix III	-	0	15000000	Increasing	Unknown	-	It has been evaluated as a priority biodiversity feature as it is hunting incidents in the region and degradation of the species' habitat throughout the country.	PBF
Brown bear	Ursus arctos	LC	Appendix I-II	Appendix II-IV	L	110000	Stable	-	-	Due to the lack of information on the population status of the species, it is difficult to provide an assessment of whether the species critical habitat trigger or not. Since the IUCN category is VU for Mediterranean region, it has been	PBF

CH/PBF
Not trigger
Not trigger
However species is KBA trigger and bat survey was very limited. Species might have easily not been detected. Adopting a precautious approach, this species was designated PBF.PBF
Not trigger
Assessment was made based on assigning one point each for the following criteria: (1) conservation status is VU or higher, (2) collision risk is high (half point for medium) and (3) species is a mid or long-distance migrant. As the species scored 2, it will be considered as PBF.

CH/		
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<b>U</b>	-	

								evaluated as a priority biodiversity feature under Criterion 1b.			
able 4.5: CHA for Invertebrate Species depends on Criteria 1-3											
Common Name	Scientific Name	IUCN	BERN	Habitats directive	L/O	Global Population	Population Status	Estimated EOO (km²)	Cr 1,3 %Global Range in Aol	Evaluation	CH Trigger or Not
Ottoman's Copper	Lycaena ottomana	LC	-	-	L	Unknown	Stable	Unknown	-	Species is common and populations are robust in Turkiye and the Mediterranean. Located on a mountain ridge, Project Aol does not overlap the preferred habitat of the species.	Not trigger
										Big-Bellied Glandular Bush-Cricket is found in forest, scrub and grassland habitats at altitudes ranging from 0 to 1,270 metres. The species inhabits steppe-like habitats dominated by	
Big-Bellied Glandular Bush- Cricket	Bradyporus macrogaster	EN	-	-	L	Unknown	Decreasing	200000	-	xeric grasses and sparse scrub, in some areas like the Aegean coast of Anatolia it enters Mediterranean vegetation, such as sparse xerothermic oak forests or scrub or mesoxeric grass associations.	Not Trigge
CIICKE										The species prefers sparse vegetation cover areas in terms of forest and shrub areas. The Project Aol does not include these type of habitats.	
										Thus, the species is not considered as critical habitat trigger species.	

## 4.2 Criterion 4: Highly Threatened / Unique Ecosystems

Based on EUNIS level 3, two habitat types were determined based on desk study and field observation. One of these habitat types is *Pinus nigra* woodland that is listed in Annex I of the EU Habitats Directive and considered as priority habitat according to EU Habitat Directive Annex I.

#### Table 4.6: Criterion 4- Highly Threatened / Unique Ecosystems Assessment

Broad habitat type	EUNIS Habitat Type	EU Habitat Directive Annex I	IUCN	Evaluation	CH Trigger or Not	
	G3.5 Pinus nigra woodland	+ (9530) Priority	LC	Although this habitat is prioritized according to the EU directive, it is not defined as critical habitat as its IUCN category is LC, but it is considered as a priority biodiversity feature.		
Woodland	G4.B Mixed Mediterranean pine - thermophilous oak woodland	-	-	<ul> <li>This habitat, which is a mixture of G1.7 (thermophilu deciduous woodland) and G3.7 (Pinus nigra woodland) is not included in the EU habitat directive and has not yet been evaluated by IUCN.</li> </ul>	,	
	G5.5 Small mixed broadleaved and coniferous anthropogenic woodlands	*	*	This habitat type is not critica habitat trigger or PBF as it is modified and does not contain any significant species.		

### 4.3 Criterion 5: Key Evolutionary Processes

The Project area is located within the Mediterranean biodiversity hotspot. It is the third richest hotspot globally in terms of plant biodiversity, and amphibian and fish endemism are relatively high too. The hotspot is very large (including 5,000 Mediterranean islands). The highly modified nature of the habitats (most forest areas are presented with code B-it means degraded-) within the EAAA means it is extremely unlikely to qualify as Critical Habitat for Key Evolutionary Processes.

## 4.4 Criterion 4: Highly Threatened / Unique Ecosystems

Based on EUNIS level 3, two habitat types were determined based on desk study and field observation. One of these habitat types is *Pinus nigra* woodland that is listed in Annex I of the EU Habitats Directive and considered as priority habitat according to EU Habitat Directive Annex I.

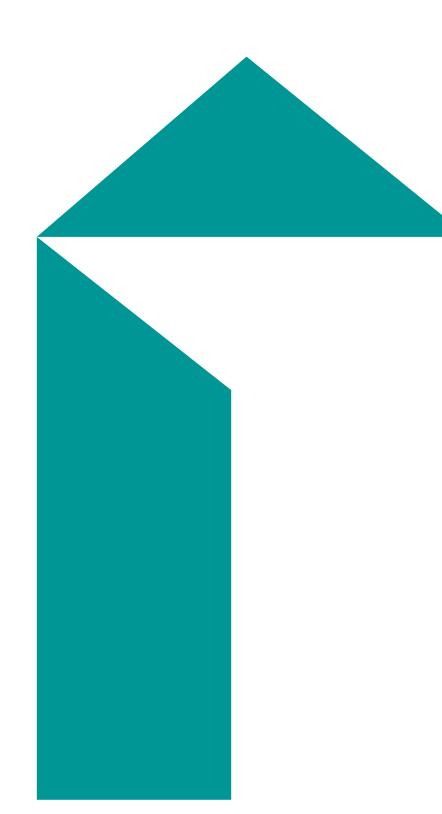
#### Table 4.7: Criterion 4- Highly Threatened / Unique Ecosystems Assessment

Broad habitat type	EUNIS Habitat Type	EU Habitat Directive Annex I	IUCN	Evaluation	CH Trigger or Not
	G3.5 Pinus nigra woodland	+ (9530) Priority	LC	Although this habitat is prioritized according to the EU directive, it is not defined as critical habitat as its IUCN category is LC, but it is considered as a priority biodiversity feature.	PBF
Woodland	G4.B Mixed Mediterranean pine - thermophilous oak woodland	-	-	- This habitat, which is a mixture of G1.7 (thermophilus deciduous woodland) and G3.7 (Pinus nigra woodland), is not included in the EU habitat directive and has not yet been evaluated by IUCN.	
	G5.5 Small mixed broadleaved and coniferous anthropogenic woodlands	*	*	This habitat type is not critica habitat trigger or PBF as it is modified and does not contain any significant species.	l Not Trigger

### 4.5 Criterion 5: Key Evolutionary Processes

The Project area is located within the Mediterranean biodiversity hotspot. It is the third richest hotspot globally in terms of plant biodiversity, and amphibian and fish endemism are relatively high too. The hotspot is very large (including 5,000 Mediterranean islands). The highly modified nature of the habitats (most forest areas are presented with code B-it means degraded-) within the EAAA means it is extremely unlikely to qualify as Critical Habitat for Key Evolutionary Processes.





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