GÖKÇEHÖYÜK SOLAR POWER PLANT PROJECT

CULTURAL HERITAGE MANAGEMENT PLAN

JULY 2024 ANKARA



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LIST of ABBREVIATIONS

CFP	Chance Find Procedure			
CIFA	Chartered Institute for Archaeologists			
EBRD	European Bank for Reconstruction and Development			
EHS	Environmental, Health, and Safety			
GIIP	Good International Industry Practices			
ICH	Intangible Cultural Heritage			
ICOMOS	International Council of Monuments and Sites			
IFC	International Finance Corporation			
IFIs	International Finance Institutions			
KPI	Key Performance Indicator			
OHS	Occupational Health and Safety			
Plan or CHMP	Cultural Heritage Management Plan			
Project	Gökçehöyük Solar Power Plant			
PRs	Performance Requirements			
PSs	Performance Standards			
WPP	Solar Power Plant			
UNESCO	United Nations Educational, Scientific and Cultural Organization			
Project Owner or Contractor	Gölbaşı Municipality			

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1. INTRODUCTION

This document Construction Archaeology and Cultural Heritage Management Plan has been designed by Gökçehöyük Solar Power Plant (SPP) Project Mangement in order to direct the Contractor to execute their activities in relation to cultural heritage. This plan (including Chance Find Procedure (CFP)) study has been conducted in line with the local law, legislation, EBRD PR8 and IFC PS8.

Considering the cultural heritage potential of the project location, this Cultural Heritage Management Plan (CHMP) aims to propose a set of actions to preserve the cultural heritage within the scope of the Gökçehöyük Solar Power Plant (SPP) Project and to minimize possible adverse effects of the project (Figure 1-1).



Figure 1-1. Gökçehöyük Solar Power Plant Project Area

The impact mitigation on the potential cultural heritage sites/elements within the project impact area is possible by developing and implementing a management plan. There are crucial natural resources (such as water resources, and proximity to agricultural areas) suitable for human settlement around the geographical area where the project is located. On the other hand, there may be tangible cultural heritage assets (chance finds) that have been buried in the geographical area of the Project or its close vicinity and whose existence will be determined by advanced research techniques or that will be unearthed during the construction works.

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Therefore, the construction activities within the scope of the project should be conducted in compliance with the proposed management plan.

In addition, result of desktop studies, some important tangible cultural heritage assets have been identified in the immediate surroundings of the Project Impact Area. These tangible cultural heritage assets are presented in Table 5-1 and Figure 5-1.

This document has been prepared by REGIO Cultural Heritage Management Consultancy on behalf of 2U1K Mühendislik ve Danışmanlık A.Ş.

1.1. Purpose

The purpose of the Plan is to avoid significant adverse impacts to cultural heritage and to describe the provisions for managing chance finds through a chance find process which will be applied in the event that cultural heritage is subsequently discovered.

The general purpose of this Management Plan is to:

- Outline the applicable standards with regards to the protection of Cultural Heritage.
- Identify the actual and potential sources of impact on Cultural Heritage.
- Establish effective plans and procedures for managing and mitigating impacts to cultural heritage sites.
- Define roles and responsibilities.
- Define monitoring and reporting procedures.
- Define training requirements.

1.2. Sources of Impact

This Cultural Heritage Management Plan applies to all project activities that have the potential to cause an impact on the cultural heritage. This includes especially all construction activities of the project and cultural protection measures, such as the chance find procedure (CFP) applicable for the Project.

1.2.1. Sources of Impact

The activities to be conducted during all Project phases may cause direct potential impacts on the cultural heritage receptors, if not properly managed. The key Project activities that may result in impact (direct or indirect) upon archaeology and cultural heritage receptors during all Project phases are summarised in Table 1-1.

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Table 1-1. Sources of Impacts on Cultural Heritage Receptors during All Project Phases

Phase	Description of Activity	Potential Receptors that may be Affected by the Activities	
Land preparation phase Construction phase (For all Project Sites)	 Area selection (panel locations, selection of camp sites, storage and access road) Removal of vegetation and/or trees Installation of fencing Traffic movements (vehicles and staff) Topsoil stripping Excavation and Filling Construction traffic movement Siting of construction sites and other Project/associated facilities Piling Landscaping/ earth-mounding Waste disposal including excess excavated 	 Architectural Heritage Archaeological Sites Archaeological/ Historical Assets Potential Chance Find Assets Intangible Cultural Heritage Elements 	
Operation phase	materials Structures, installation features (fencing, cables etc.) Presence of workforce Leaks and spills Vibrations caused by heavy traffic Visual Impacts on Cultural Heritage Noise Access difficulties		

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2. REGULATIONS, STANDARDS AND GUIDANCE

In this section, regulations, standards and guidance related to the management of cultural heritage is summarized.

3. OBJECTIVES

The general objectives of this Management Plan are to:

- To define the outline of the applicable standards concerning the protection of Cultural Heritage.
- To identify the actual and potential sources of impact on the Cultural Heritage Assets.
- To establish an effective plan and a procedure for managing and mitigating impacts on cultural heritage sites/assets.
- To define roles and responsibilities.
- To define monitoring and reporting procedures.
- To define training requirements.
- To manage, minimise and mitigate the impacts of construction works on the archaeological and cultural heritage assets, in line with the regulatory requirements by implementing adequate procedures and control mechanisms on site.
- To monitor the Contractor's performance continuously throughout construction works.
- To refine archaeology and cultural heritage management controls as part of a continuous improvement process.

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3.1. National Legislations

3.1.1. National Legislation for Tangible Cultural Heritage

In Türkiye, the movable and immovable cultural and natural assets are under protection as dictated by the "Law on Preservation of Cultural and Natural Assets", 2863, which was published in the Official Gazette numbered 18113 and dated 23 July 1983. The cultural and natural heritage, which is protected by the aforementioned Law, is identified as:

- ➤ Natural properties which require protection and immovable assets which were built before the end of the 19th century.
- > Any immovable cultural asset constructed after the end of the 19th century but categorized as "a significant asset which requires preservation" by the Ministry of Culture and Tourism.
- Immovable cultural assets located within the boundaries of Protection Sites; Structures, buildings or places that have witnessed significant historical events during the Turkish Independence War or the foundation of the Turkish Republic, regardless of their period and registration status; and all dwellings and buildings that have been used by Mustafa Kemal ATATURK without considering their period of construction or registration status.

The most relevant articles for the project impact assessment studies of the Law on Preservation of Cultural and Natural Assets (Law no: 2863) are given in Table 3-1.

Table 3-1. Law on the Conservation of Cultural and Natural Property (Law No: 2863,1983)

Article	Explanation
	Persons that discover movable and immovable cultural and natural property, owners, proprietors or occupants that know or have recently found out about the existence of cultural and natural property on the land they own or use shall be obliged to notify the nearest museum directorship or the village headman or the local administrators of other places within at the latest three days.
Article 4 –	If such property is in military garrisons and restricted areas, the relevant command levels shall be notified in line with the relevant procedure.
Obligation to Notify	The village headman, the local administrator receiving such notification or the relevant authorities that are directly notified of such property shall take the necessary measures to protect and secure such property. The village headman shall notify the nearest local administrator as of the situation and the measures taken on the same day. The local administrator and other authorities shall notify in writing the MoCT and the nearest museum directorship within ten days.
	Upon receiving this notification, the Ministry and Museum Director shall instigate due proceedings as soon as possible in line with the provisions of this law.
Article 5 – Quality of	Immovable property belonging to the state, public institutions and organizations and movable and immovable cultural and natural property to be protected that is known to exist or will be discovered on an immovable property owned by real and legal persons subject to civil law shall have the quality of state property.
State Property	Registered and annexed foundation property subject to a separate status due to its special qualities shall not be covered by this provision.
Article 25 – Transfer to Museums	MoCT shall classify and register based on scientific principles movable cultural and natural property declared to the MoCT according to Article 4 and movable cultural and natural property to be protected as specified in Article 23. Antiquities that need to be conserved in state museums shall be duly transferred to museums. The criteria, procedures and principles for classification, registration and transfer to museums of movable cultural and natural property to be protected shall be specified in a regulation.

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Article	Explanation
	The historical features of all kind of weapons and materials concerning Turkish military history shall be surveyed, examined and evaluated by the General Staff at the location they are found or are reported to be found.
	Antiquities excluded from the classification and registration and not needed to be placed in museums shall be returned with a document to their owners. The cultural property that has been returned with a document shall be at the discretion of their owner. Antiquities not taken back within one year by their owners can be kept at the museum or sold duly by the State.

In addition to Law no: 2863 on Preservation of Cultural and Natural Assets, there are some regulations and principal decisions governing the management of cultural and natural assets. According to the Principal Decision no: 658 taken on November 5th, 1999, on "Archaeological Sites, Conditions of Protection and Usage", the archaeological sites are classified into three main categories:

- 1st Degree Archaeological Sites: Areas requiring highest level of protection, with the exception of scientific excavations aiming their protection. Neither construction nor development are allowed in these sites. All kinds of construction, excavation, and modification activities are prohibited within the boundaries of these sites. However, for exceptional cases such as the necessity for infrastructure construction, Regional Council for the Conservation of Cultural Property may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team.
- **2**nd **Degree Archaeological Sites**: Sites which require medium level of protection. They should be preserved based on the conditions of protection and utilisation set by the Regional Council for the Conservation of Cultural Property. Additional construction is prohibited. Similar to the 1st Degree Sites, for exceptional cases such as necessity for infrastructure construction among others, Regional Council for the Conservation of Cultural Property may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team.
- **3rd Degree Archaeological Sites**: Construction is permitted based on the decisions of Regional Council for the Conservation of Cultural Property. Before applying for a construction permit, test pit excavations should be conducted under the supervision of the local museum, and the outcomes of these excavations should be reviewed by the museum and, if present, the head of the scientific excavation team. Reviews should be submitted to Regional Council for the Conservation of Cultural Property. The Council may ask for extension of the scope of test pits before taking any decision.

Furthermore, Implementation Guidelines for Field Surveys, Test Pits and Excavation Works on Cultural and Natural Assets (Ministry approval number 94949537-160.99-51264, dated 13.03.2013) define the procedures for salvage excavations, archaeological test pits and other studies.

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3.1.2. National Legislation for Intangible Cultural Heritage

UNESCO put into effect the "Convention for the Safeguarding of the Intangible Cultural Heritage" in the 32nd General Conference held in Paris between September 29th and October 17th, 2003. The convention was officially accepted by the Republic of Türkiye with the "Law No. 5448 Regarding the Approval of the Convention of Safeguarding of Intangible Cultural Heritage on January 19th, 2006". The intangible cultural heritage legally safeguarded by the relevant law was defined as follows:

 Cultural products and production processes such as oral narratives and oral traditions created by the folk in oral culture environments and included in folklore studies, performance arts, social practices, rituals and festivals, folklore, practices related to the universe and nature, handcraft traditions.

3.2. International Standards

Policies of IFC and EBRD on cultural heritage is set out in the following documents:

- International Finance Corporation, Performance Standard 8, Cultural Heritage, January 1, 2012
- European Bank for Reconstruction and Development (EBRD), Performance Requirement 8, Cultural Heritage, March 2023

The objectives of these documents are:

- To support the conservation of cultural heritage in the context of EBRD and IFC financed projects.
- To protect cultural heritage from adverse impacts of project activities.
- To promote the equitable sharing of benefits from the use of cultural heritage.
- To promote the awareness of, and appreciation of, cultural heritage where possible.

These policies are later adopted by international finance institutions and became widely accepted principles by international lenders.

3.3. International Convention and Guidelines

Türkiye has ratified the following key international conventions regarding the cultural heritage, which are applicable to the Project:

 United Nations Educational, Scientific, and Cultural Organisation (UNESCO), Convention on the Protection and Promotion of the Diversity of Cultural Expressions, Paris, 20 October 2005 (Türkiye made the ratification accession on 02 November 2017).

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- United Nations Educational, Scientific, and Cultural Organisation (UNESCO), Convention for the Safeguarding of the Intangible Cultural Heritage, Paris, 17 October 2003 (Türkiye made the ratification accession on 27 March 2006).
- United Nations Educational, Scientific, and Cultural Organisation (UNESCO),
 Convention on the Protection of World Cultural and Natural Heritage, Paris, 16
 November 1972 (Türkiye made the ratification accession on 16 March 1983).
- United Nations Educational, Scientific, and Cultural Organisation (UNESCO), Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, Paris, 14 November 1970 (Türkiye made the ratification accession on 21 April 1981).
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS 2011.
- Guidance and Toolkit for Impact Assessments in a World Heritage Context, ICOMOS 2022.

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4. ROLES AND RESPONSIBILITIES

4.1. Official Responsible Bodies

The basic definitions regarding the management of cultural heritage for the project are given in the following bullets:

- Ministry of Culture and Tourism and its affiliated institutions such as the Museum Directorate and Regional Council for the Conservation of Cultural Property are the responsible authorities regarding all archaeological and cultural heritage related issues.
- For tangible cultural heritage, Museum of Anatolian Civilizations is responsible to dispatch experts to the sites within 24 hours after being informed and to officially identify the Chance Find (described in APPENDIX 1- CHANCE FIND PROCEDURE (CFP)).
 Museum directorate is responsible for the management of excavation within the chance find area. Museum Directorate will follow the directions and decisions of the relevant Ankara Regional Council for the Conservation of Cultural Property (Table 4-1 and Table 4-2).
- For tangible cultural heritage, Ankara Regional Council for the Conservation of Cultural Property is the only decision maker on any intervention which would be made on the site after the chance find.
- Ankara Provincial Directorate of Culture and Tourism are the sole decision maker for intangible cultural heritage (Table 4-3).

Table 4-1. Responsible Regional Council for the Conservation of Cultural Property

Regional Council for The	Contact Information			
Conservation of Cultural Property	Adress	Phone	E-Mail	
Ankara Regional Council for the Conservation of Cultural Property	Konya Sokak No:46 Ulus / ANKARA	(0312) 310 42 96	ankarakurul@ktb.gov.tr	

Table 4-2. Responsible Regional Museum Directorate

Museum Directorate	Contact Information			
massam Birostorato	Adress	Phone	E-Mail	
Museum of Anatolian Civilizations	Gözcü Sok. No: 2 Hisar Altındağ /ANKARA	(0312) 324 31 60 (0312) 324 31 61	anadolumedmuzesi@ktb.gov.tr anmedmuz@gmail.com	

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Table 4-3. Responsible Provincial Directorate of Culture and Tourism

Provincial Directorate of	Contact Information				
Culture and Tourism	Adress	Telefon	Adress		
Ankara Provincial Directorate of Culture and Tourism	Anafartalar Caddesi No:65/67 06250 Ulus/ANKARA	(0312) 415 48 00	iktm06@ktb.gov.tr		

4.2. Project's Responsible Bodies

Contractor will be responsible for the preparation and implementation of the environmental and social impact assessment-based management plans, which have to be project-specific. These plans shall be applicable, detailed procedures for use in the field have to be furnished. The contractor will ensure the implementation of the commitments stated in the project-specific plans, and also shall comply with all relevant project standards, statutory requirements, permit and license conditions and secure all applicable permits and licences.

The responsibilities of the contractor are given below:

- The contractor will be responsible for the preparation and implementation of the environmental and social impact assessment-based management plans, which have to be project-specific. These plans shall be applicable, detailed procedures for use in the field have to be furnished. The contractor will ensure the implementation of the commitments stated in the project-specific plans, and also shall comply with all relevant project standards, statutory requirements, permit and license conditions and secure all applicable permits and licenses.is responsible for the management of the plan and implementing the procedures about cultural heritage and archaeological aspects of the Project.
- The contractor is responsible for periodically consulting with communities within the impact area during the project activities and resolving any potential negative circumstances that may occur in relation with the cultural heritage of local communities.
- The contractor is responsible for establishing a grievance redress mechanism within the scope of the Project, through which complaints related to cultural heritage can be submitted, and they are periodically monitored for producing solutions.
- In case of a cultural heritage related salvage and/or test excavation (including restoration/ conservation) required, the contractor is responsible to provide the necessary staff, technical assistance, other necessary services and equipment.
- Daily archaeological monitoring activities during all ground-disturbing activities of the Project Construction Phase (including reinstatement stages) will be carried out by an archaeologist who will be assigned by the Project subcontractor. Archaeological monitoring (watching brief) will cover all project areas. The contractor will be

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responsible for the timely assignment of an archaeological monitoring expert (acceptable experience and competency). The contractor will also be responsible for the control of the daily archaeological monitoring activities for all project construction areas. The assignment of the monitoring archaeologist shall be completed before the construction activities of the project.

 E&S Manager will be in charge of the cultural heritage/archaeological monitoring expert and their daily, weekly and monthly activities.

The responsibilities of the **cultural heritage/archaeological monitoring expert/s** are given below:

- The expert is responsible to implement the monitoring activities with regard to the project's impact on the cultural heritage assets during the design, land preparation and construction phases.
- Monitoring of the daily construction works during the project construction period will be the responsibility of the monitoring the expert.
- The cultural heritage/archaeological monitoring expert will work with the equipment operators and have authority to stop the work. The expert will accompany all ground disturbance activities of the project.
- The expert will instruct the operator to stop the work in case of a chance find.
 Resuming ground disturbance activities after a chance find will also be under the authority of the expert.
- Cultural heritage monitoring reports (daily, weekly and monthly) will be submitted to E&S Manager by the cultural heritage/ archaeological monitoring expert.
- The expert of the Project will train the employees about CHMP and CFP.
- The expert will ensure that CHMP and CFP are adequately enforced during all ground disturbance activities.
- The expert is responsible to establish good governance between the project management side and official responsible bodies (such as museum directorates and Regional Council for the Conservation of Cultural Property).

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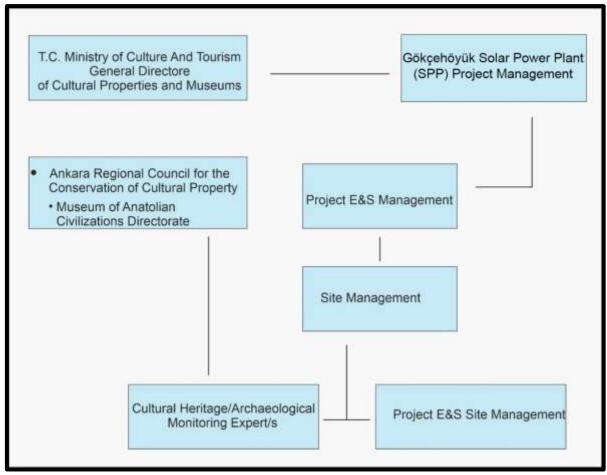


Figure 4-1. Management Structure

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5. BASELINE CONDITIONS AND POTENTIAL SENSITIVITIES

5.1. Palaeontological, Archaeological Background

Anatolia is located between the Black Sea and the Mediterranean. It forms a land bridge and a natural transportation corridor between Asia and Europe. There are rich agricultural and mineral resources and therefore many civilizations developed in the Middle East. Central Anatolia, which coincides with the Project region, has been home to many civilizations throughout history, including the Neolithic, Chalcolithic and Bronze Age cultures, Assyrian Trade Colonies, Hittites, Phrygians, Persians, Greeks, Romans, Byzantines, Anatolian Seljuks and Ottomans. Thus, the Management Plan studies have given particular importance on the characterization of baseline cultural heritage conditions of the region where the Project area is located.

The Project area is through Ankara province Gölbaşı district borders. The palaeontological background of Project area and it surroundings have been evaluated separately and are given in detail below. The two wide-spread rock units in Ankara region and near the project area are Karakaya Complex and Sakarya Zone. Karakaya Complex consists of highly deformed and partly metamorphosed clastic and volcanic series of Permian and Triassic age. Although metamorphosed units lack palaeontological data, limited fossil and radiometric data are available for low-degree metamorphosed rocks. For this unit, fossil ages have been determined as Early Triassic for foraminifera around Ankara¹. In 2004, Palaeontological studies have been conducted in area located in the Sakarya Zone in the vicinity of Gökçehöyük village at southwest of Gölbaşı along the Ankara- Haymana road. Carbonates of this sequence have neritic limestones. The basal limestones following fossils have been determined: Bradyina sp., Pachysphaerina sp., Eotuberitina sp., Tuberitina sp., Mediocris sp., Koktjubina sp., Biseriella sp. indicating early Carboniferous (Visian-Serpuhovian) age; Ozawainella sp., Eostaffella sp., Tetrataxis sp., Lasiodiscus sp., Globivalvulina sp., Eotuberitina sp. indicating middle Carboniferous (Bashkirian-Moskovian) and Ozawainella sp., Lasiodiscus sp., Eotuberitina sp., Globivalvulina sp., Beresella sp. indicating middle Carboniferous (TMMOB-JMO, 2004)².

The region and its surroundings where solar power project will be implemented contains examples of almost all the prehistoric and historic periods of Anatolia. Desk-based research was conducted by retrieving scientific publications, research results and data from the Regional Conservation Boards along the Project area and its surroundings. The sites identified based on desktop studies are presented in Table 5-1 and Figure 5-1.

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¹ Akyürek, B., Öğütle, E., Erol Çatali, Zeki Sağer, Solmaz Soysal, & Orhan Sunu. (1979). Eldivan - Şabanözü (Çankırı) Dolayında Ofiyolit Yerleşmesine İlişkin Bulgular. JMO, 5-12.

² TMMOB-JMO. (2004). Jeolojik Zaman Çizelgesİ. TMMOB JMO.



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The Project area and its surroundings are located within the borders of the ancient Galatia Region. Galatia means the homeland of Celts/Gauls in Ancient Greek. The region was named after the people, whom Ancient Greeks called Keltai, Keltoi (singular, Keltos) or Galatai, Galates, came and settled in the Hellenistic Period³.

There are archaeological sites and ruins within the borders of Gölbaşı that shed light on the history of the region. During excavations and research, findings from the first bronze, Hittite, Roman and Byzantine periods were found in the region. Ahlatlibel and Taşpınar in the northwest, Gökçehüyük in the southwest, Karaoğlan in the southeast, Selametli town in the south, and Yurtbeyi village settlements in the east. Mounds and ruins from the early bronze age in Selametli Gökçehüyük and Bezirhane villages; Cemetery and column heads from the Roman period in Taspınar village; Coins and ruins from the Byzantine period in Karaoğlan; Church ruins from the Early Christian period were found in Yurtbeyi and Karaoğlan villages. Gökçe Mound is within the borders of Gökçehüyük neighborhood. Traces of stone foundations can be seen at its foot. It is understood from the collected pottery pieces that it was inhabited in the Early Bronze Age. The mound is within the neighborhood. It is approximately 100 m in diameter, 12 m high and has an altitude of 1095 m. Gökçe Mound is also known as Çerkez Mound. It was registered as a 1st Degree Archaeological Site by the decision of the Preservation Board in 1995 and 2007. Another important cultural asset is in the Gökçehüyük is Karazlı mound. Karazlı mound is 2 km southwest of Gökcehüvük neighborhood. Karazlı mound was declared a 1st Degree Archaeological Site in 2001. The SPP Sub-project area is not located within any protected area and does not fall within any tourism center or culture and tourism protection and development zone.

The Turkish period in the region started with Seljuk domination. The period which covered the Anatolian Principalities and Ottoman Periods continues with the Republic of Türkiye.

Known assets and areas having archaeological/ cultural heritage importance vicinity of the Project Area are presented in Figure 5-1 and Table 5-1.

Table 5-1. Tangible Cultural Heritage Sites in the Vicinity of the Project

No	Name of Tangible Cultural Heritage Asset	Province	District	Neighbourhood	Distance to Project Area (km)
1	Gökçe Hoyuk		Gölbaşı	Çerkezhöyük (Gökçehüyük)	1,3
2	Yayvan Hoyuk		Gölbaşı	Hacılar - İmar	9
3	Karaoğlan Hoyuk		Gölbaşı	Karaoğlan - İmar	9,7
4	Yağlıpınar 3 rd Degree Archaeological Site	Ankara	Gölbaşı	Yağlıpınar	4,5
5	Velihimmetli Hoyuk		Gölbaşı	Velihimmetli	8,3
6	Devetaş Hoyuk		Gölbaşı	Velihimmetli	8,7
7	Karazlı (Karbağazlı) Hoyuk		Gölbaşı	Çerkezhöyük (Gökçehüyük)	4,9

³ UMAR, B. (1993). Türkiyede Tarihsel Adlar. İstanbul: İnkılap Kitapevi.

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No	Name of Tangible Cultural Heritage Asset	Province	District	Neighbourhood	Distance to Project Area (km)
8	Çoraklı Settlement and Cemetery		Gölbaşı	Karagedik	7,4

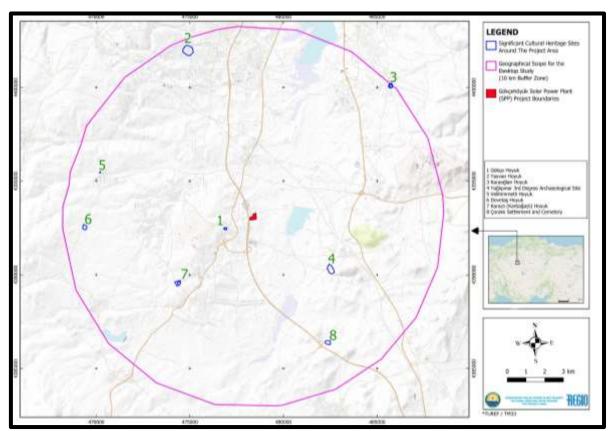


Figure 5-1. Cultural Heritage Assets Surrounding the Project Licence Area

5.2. Potential Sensitivities

Table 5-2 summarizes the impacts of construction activities on cultural heritage and archaeological assets.

Table 5-2. Construction Activities Impact on Tangible Cultural Heritage Features

Activities	Driver	Value
 Site establishment, site levelling and preparation including stripping topsoil, piling, trenching Horizontal Directional Drilling (HDD) and excavation. Establishment of temporary stockpile areas. Stockpiling of materials. Development of access roads. Solarbreak planting and fencing works. 	Mechanical disturbance or land use changes from construction activities	 Cultural heritage features: High significance within local communities. Some cultural assets support local economies as tourist attractions. Disruption to cultural practices. Obstruction of access routes.

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	Activities	Driver	Value
>	Use of vehicles, generators, plant and stationary equipment		
>	Parking and maintenance areas for construction vehicle		

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6. CONTROL MEASURES

The Environmental and Social Control Measures in this section represent "industry good practice" such as those contained in the World Bank EHS Guidelines⁴.

6.1. Cultural Heritage Control Measures

Contractor shall consider all the below Control Measures and Standard Requirements for archaeology and cultural heritage (Table 6-1). These control measures are applicable to construction activities such as demolition, site preparation, access routes, site compounds, excavation works.

Table 6-1. Cultural Heritage Control Measures

Table 6-1. Cultural Heritage Control Measures				
No	Mitigation Measure	Responsibility		
1	CONTRACTOR should be considered and used effectively during the construction and operation phases Chance Find Management Plan.	The Contractor and Gölbaşi Municipality		
2	CONTRACTOR should inform relevant staff (particularly machinery operators) of the location of all protected heritage or archaeological sites (within the project area or its surrounding) and trained in responsibilities to protect identified sites and report any suspected heritage discoveries. Records should be maintained for audit.	 The Contractor and Gölbaşi Municipality 		
3	CONTRACTOR should maintain public access to the archaeological and cultural sites construction works in consultation with Project Environment Department.	The Contractor and Gölbaşi Municipality		
4	CONTRACTOR should not site power generation, blasting, excavation, compaction, heavy vehicle movement, piling hazardous material storage, or other significant source of vibration or contamination within 50m of known heritage sites without approval of Project Environment Department.	 The Contractor and Gölbaşi Municipality 		
5	CONTRACTOR should, retain qualified archaeologists with input from Project Environment Department for periodic site inspections and the overall management of the cultural heritage features. Records of periodic heritage inspections should be made available for audit.	 The Contractor and Gölbaşi Municipality 		
6	CONTACTOR should prohibit disturbance or damage to any archaeological and cultural asset including graffiti.	The Contractor and Gölbaşi Municipality		
7	CONTRACTOR shall in the event of an unexpected archaeological comply with the Chance Find Procedure find CONTRACTORS shall: > All work must cease at the location where the discovery is made. > A temporary buffer zone around the chance find will be put in place. > The cultural heritage/archaeological monitoring expert/s will contact the Contractor site management and museum expert immediately. > The cultural heritage/archaeological monitoring expert/s will properly secure the chance find site: flagging, no-entry signs etc.	 The Contractor and Gölbaşi Municipality Foreman/ Construction Manager Cultural heritage/ archaeological monitoring expert archaeologist 		

⁴ https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf

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No	Mitigation Measure	Responsibility
	Protection of site: the chance find should not be moved, removed or further disturbed.	Site Workers/ Operators
	Work in the area of the unexpected find may only recommence after obtaining approval from the Project Environment Department.	

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7. TRAINING, REPORTING AND MONITORING

7.1. Training

The cultural heritage/archaeological monitoring expert/s will provide cultural heritage training to all relevant project staff in order to get capacity building with regards to cultural heritage importance and preservation including the implementation of the CFP as part of their Environmental Training.

All on-site construction staff will be trained in the implementation of the CFP and they shall be provided with a basic identification of cultural heritage resources of the area to help them the identification of chance finds.

The expert/s will receive "environmental training" as well as specialized training for the procedures to follow for all ground disturbance activities. These trainings will be repeated periodically. The records of the training such as attendee list, the presentation made during the training, etc. will be kept by the cultural heritage experts as hard copy and electronical copy.

7.2. Monitoring and Reporting

The cultural heritage/archaeological monitoring expert/s will record chance finds on the Chance Find Report Form and the Chance Find Register as per the CFP given in APPENDIX 1- CHANCE FIND PROCEDURE (CFP). The register will be kept up to date by the experts. The Chance Find Report Form will be kept in hard copy and as electronical copy within the main project archives. A summary of the status of chance finds will be reported by the experts to Environmental and Social Manager on a weekly basis.

The function of the archaeological monitoring process will be as follows:

- Provide advice to define the areas where the construction activities may continue or shall be stopped due to archaeological/movable/immovable cultural heritage findings.
- To record archaeological/cultural heritage features observed on, and close to the existing project related areas.
- To record archaeological/cultural heritage features discovered during project construction activities.
- To provide advice in the form of a 'preliminary assessment' to the relevant department
 of the project on the significance and implications of new archaeological discoveries
 on the project construction areas.

All ground disturbance activities will be monitored by cultural heritage expert during the Project activities. In case of encountering any cultural heritage findings, the CFP described in APPENDIX 1- CHANCE FIND PROCEDURE (CFP) will be initiated.

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The schedule for monitoring will be developed in coordination with the construction schedule. Monitoring activities will be implemented daily. The monitoring schedule will be dictated by the construction schedule as determined by the construction/operation management.

7.2.1. Key Performance Indicators (KPI)

Key performance indicators (KPIs) and records have been defined to observe the performance of the Contractor on the subject of Cultural Heritage. The identified KPIs are expected to be reported in monthly basis. The cultural heritage related KPIs and records to be reported for the reporting period are given in below Table 7-1.

Table 7-1. KPIs and Measures for Management Plan

Performance Indicator	Туре	Period	Target
# of known archaeological/cultural heritage sites damaged during construction activities	KPI	Monthly	0
# of times work stopped by Contractor to report chance finds	KPI	Monthly	0
% of non-compliances raised by Gölbaşı Municipality which are closed within agreed timeframe	KPI	Monthly	0
In case of any chance finds, the relevant documentation and report preparation and communication were carried out following the Chance Find Procedure.	Measure	During the project construction period	NA
In case of any test pit and/or salvage excavation required, the necessary formal authorisation process is initiated in accordance with the Chance Find Procedure.	Measure		NA
Adequate resources (assigned archaeology team and staff, equipment, time, budget, etc.) are provided by the project management in the event of any test pit and/or salvage excavation.	Measure		NA
Chance finds may require a project revision (replanning of instalment locations of the power plant panels or any project facility, etc.).	Measure		NA

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8. CULTURAL HERITAGE FINDINGS

Regardless of its degree of importance, in case of encountering any cultural heritage; Project activities in the finding area shall be stopped immediately. For tangible cultural heritage, relevant Museum Directorate, for intangible cultural heritage, relevant Provincial Directorates of Culture and Tourism should be notified within 3 days in line with the legislation. The procedure given in APPENDIX 1- CHANCE FIND PROCEDURE (CFP) that must be followed in case of encountering a chance find is based on national legislation and provisions of international standards and best practices. Description of the significance levels of the findings is given below. The following levels are applicable only to tangible cultural heritage.

Following the completion of investigation of the relevant official directorate, the necessary arrangements, such as the identification of the boundaries of the cultural heritage asset/site (finding), its protection by taking necessary measures, notification of workers in order to prevent any physical intervention, will be implemented.

8.1. Minor Significance

This type of findings is comprised of a finding isolated from its environment or findings in notably small sizes which may be found by chance. In this case, CFP will be followed.

8.2. Moderate Significance

This type of findings is small scale findings in groups or single findings with medium size architectural elements such as tombs. In this case, CFP will be followed. In order to prevent a possible damage, necessary arrangements must be made to determine the boundaries of the archaeological remains to keep the construction equipment out of access.

8.3. Major Significance

This type of finding is comprised of findings with great importance such as a settlement area, a tumulus, a mound or a big necropolis (wide graveyard areas with archaeological characteristics) and the construction activities must be immediately stopped, and CFP will be followed. This type of chance find may cover the entire construction site. The entrance and exit of the construction equipment and vehicles cannot be managed without causing any damage to the archaeological remains. Therefore, entrance and exit of the construction equipment and vehicles to chance find area should be prohibited during the archaeological salvage works process for each major significance chance find areas.

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9. **REVIEW and UPDATE**

This Plan is a living document, and the responsibilities, procedures and compliance actions shall be updated as required (e.g. after a change in related legislation or insufficiencies in the implementation of this plan). It is the responsibility of the sub-contractor's expert to be fully aware of its contents, to provide relevant training to staff and to ensure that procedures are being implemented to achieve compliance with this Plan. Gölbaşı Municipality will be responsible for overall management and control of the day-to-day implementation of the Plan and to ensure compliance with Project standards.

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REFERENCES

- ➤ General Directorate of Preservation of Cultural and Historical Heritage, "Law on Protection of Cultural and Natural Assets (1) Law No. 2863", 1983.
- Law No. 5448 Regarding the Approval of the Convention of Safeguarding of Intangible Cultural Heritage on January 19th, 2006".
- Law No. 4848 on the Organization and Duties of the Ministry of Culture and Tourism (Official Gazette No. 25093 dated 29.04.2003).
- ➤ ICOMOS (International Council of Monuments and Sites) "Guidance on Impact Assessment for Cultural World Heritage", January 2011.
- Guidance and Toolkit for Impact Assessments in a World Heritage Context, ICOMOS 2022.
- CIFA, Standard and Guidance for the Collection, Documentation, Conservation and Research of Archaeological Materials, 2014
- CIFA, Standard and Guidance for Historic Environment Desk-Based Assessment, 1994 (revised in 1999).
- ➤ CIFA, Standard and Guidance for An Archaeological Watching Brief 1994 (revised in 1999).
- ➤ CIFA, Standard and Guidance for Archaeological Field Evaluation, 1994 (revised in 1999).
- ➤ UNESCO, "Convention Concerning the Protection of the World Cultural and Natural Heritage", November 1972.
- ➤ NEOM Project, Project Technical Requirement, "Archaeology and Cultural Heritage Management Plan", 2023.
- ➤ NEOM Project, NEOM Heritage Department Procedure, "Chance Finds Procedure", 2024.

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APPENDIX 1- CHANCE FIND PROCEDURE (CFP)

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1. Introduction

There is a possibility of encountering some unknown archaeological sites and cultural heritage assets as a Chance Find during project construction activities. The contractor is responsible for the management and protection of cultural heritage resources within the Gökçehöyük Solar Power Plant Project's borders.

2. Purpose

The purpose of this document is to outline the procedure and respective responsibilities in relation to the management of Chance Finds during project construction works. The procedure applies to all project activities within the project-related associated facilities.

3. Definitions

Chance Find	Potential cultural heritage objects, features or sites that are identified outside of a formal site reconnaissance, normally as a result of construction monitoring.
Museum Directorate	Museum of Anatolian Civilizations
Regional Council for the Conservation of Cultural Property	Ankara Regional Councils for the Conservation of Cultural Property
Project	Gökçehöyük Solar Power Plant Project
Shall and must	Indicates mandatory requirements.
Should	Indicates that a provision is not mandatory but recommended as good practice.

4. References

Standards, Legislations and Laws
Ministry of Culture and Tourism, Law No:2863, Preservation of Cultural and Natural Assets
Ministry of Culture and Tourism, Principal Decision No: 658, Archaeological Sites, Conditions of Protection and Usage
International Finance Corporation (World Bank Group), PS 8, Cultural Heritage
European Bank for Reconstruction and Development (EBRD), PR 8, Cultural Heritage

5. Roles and Responsibilities

Contractor is responsible for complying with the procedure for onsite activities during project construction activities. All relevant employees involved in construction works will be trained in relation the implementation of the procedure. Contractor will request to prepare a project-specific chance find procedure from all sub-contractors. The sub-contractors will be in charge of the preparation and the implementation of their own chance find procedures in line with the prepared main document by Contractor.

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Project Role	Responsibilities
	Ensure E&S issues are being adequately addressed on site by all related departments.
Project Manager	 Support E&S site providing adequate resources on site to implement E&S monitoring and inspection activities.
	> Preparation or revision of E&S documentation plans and procedures as required.
	Participation in the identification process of significant impacts for the project and assisting to develop relevant preventive and corrective actions.
	Coordination of environmental and social information flow.
	Ensuring that E&S mitigation measures are implemented and controlled during the project construction activities.
	Developing and implementation of an environmental and social audit program and sharing lessons learned between all related departments and staff.
	Managing environmental inspectors, community liaison officers and cultural heritage/archaeological monitoring expert/s on site.
	Maintaining effective communication with the construction and project management team.
E&S Manager	Ensuring the implementation of project mitigation measures, through on-site daily inspection, advice and assistance to site construction and project management and personnel on all environmental, social and cultural heritage matters.
	Day-to-day monitoring of construction activities as they related to E&S performance.
	Implementing NCR or Corrective Actions as required, and track closure.
	Participating audits relating to E&S matters.
	Planning and managing the environmental and social trainings for all project staff on Cultural Heritage Preservation and related procedures.
	Daily reporting of E&S issues in construction activities to Site Management.
	Weekly reporting of E&S issues in construction activities to Site Management.
	Participating to meetings related to Cultural Heritage issues.
	Provides advice in the form of a 'preliminary assessment' to the site and E&S managers on the significance and implications of new archaeological discoveries in the project activity areas.
	➤ Ensures Chance Find Procedure is followed,
	Conducts and documents pre-construction surveys. Records archaeological features discovered during pre-construction and ground disturbance activities.
	Determines the needs for cultural heritage resources protection and implement mitigation measures.
Cultural Heritage/Archaeological Monitoring Expert/s	Has the authority to stop ground disturbance activities to investigate potential chance finds.
	Ensures that the relevant cultural heritage signs are displayed where and when required.
	> Implements chance find procedure and provides expertise during a chance find.
	Delivers cultural heritage preservation trainings to all project staff.
	Issues non-compliances when required and ensures all corrective actions are completed in a timely manner.
	Provides daily field and monitoring reports to the E&S manager.

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6. Chance Find Process

Cultural heritage/archaeological monitoring expert/s will be on site during all construction and ground disturbance activities to watch for the presence of cultural heritage resources. The following table outlines the step-by-step process to be followed upon a chance find discovery.

STEP 1 – After the Discovery of a Chance Find:

- > All work must cease at the location where the discovery is made.
- A temporary buffer zone around the chance find will be put in place.
- > The cultural heritage/archaeological monitoring expert/s will contact the Contractor site management and museum expert immediately.
- The cultural heritage/archaeological monitoring expert/s will properly secure the chance find site: flagging, no-entry signs etc.
- Protection of site: the chance find should not be moved, removed or further disturbed.

STEP 2 - Recording

- > The cultural heritage/archaeological monitoring expert/s will fill out Chance Find Form Part A and send a copy to E&S manager within 24 hours.
- The cultural heritage/archaeological monitoring expert/s will retain a copy of Chance Find form for his/her record.

STEP 3 - Contact with Local Authority

The cultural heritage/archaeological monitoring expert/s will notify the relevant Museum Directorate for the chance find.

STEP 4 – Authority's Decision

> The relevant Museum archaeologist will assess the value of the chance find and take corresponding actions.

STEP 4 A - No Significance to Site

- The museum archaeologist declares that the site is considered to be of no significance.
- The cultural heritage/archaeological monitoring expert/s informs relevant managers.
- The cultural heritage/archaeological monitoring expert/s records the decision on Part B of Chance Find form and sends a copy to E&S manager within 24 hours.
- The cultural heritage/archaeological monitoring expert/s retains a copy of Chance Find form for his/her record.
- No further actions required.
- This step closes out the chance find procedure.
- Construction activities may resume.

STEP 4 B - Significance to Site

- The museum archaeologist declares that the site is considered to be of significance.
- Museum directorate archaeologist decides on further actions and informs the cultural heritage/ archaeological monitoring expert/s. The Monitoring Expert/s informs relevant managers.
- Cultural heritage/archaeological monitoring expert/s records the decision on Part B of Chance Find form.
- Proceed to Step 5

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STEP 5 – Site investigation

> Project personnel follows the relevant Archaeology Museum Directorate archaeologist's instructions.

- After field investigation, Museum archaeologist declares the site has minor significance.
- The cultural heritage/archaeological monitoring expert/s inform their managers.
- The cultural heritage/archaeological monitoring expert/s records the decision on Chance Find Form Part C and sends a copy to E&S manager within 24 hours.
- The cultural heritage/archaeological monitoring expert/s retains a copy of Chance Find form for his/her records.
- No further actions required.
- > This step closes out the chance find procedure.
- Construction activities may resume

- After field investigation, Museum archaeologist declares the site has moderate significance.
- Further studies such as test pit / salvage excavations or remote sensing investigation are to be completed.
- Museum Directorate archaeologist provides instructions, and/or supervision for the studies.
- The cultural heritage/archaeological monitoring expert/s informs their managers.
- Under the supervision of the museum archaeologist, project management provides a study team. The team will be composed of qualified archaeologists, other experts and workers.
- Once the studies/excavation is completed, the study team provides a report to the Museum Directorate,
- The Museum Directorate reports the study outcomes to the relevant Regional Councils for the Conservation of Cultural Property.
- The relevant Regional Councils for the Conservation of Cultural Property officially confirms completion of recovery and informs the project management.
- The cultural heritage/archaeological monitoring expert/s records the decision on Chance Find Form Part C and sends a copy to E&S manager within 24 hours.
- The cultural heritage/archaeological monitoring expert/s retains a

- After field investigation, Museum archaeologist declares the site has major significance.
- Salvage excavation is to be completed.
- Site is to be treated according to Turkish archaeological regulations "Law on the Conservation of Cultural and Natural Property (2863) 21.07.1983.
- Museum Directorate archaeologist provides instructions, and/or supervision for test pit/salvage archaeological excavation.
- The cultural heritage/archaeological monitoring expert/s inform their managers.
- Under the supervision of the Museum archaeologist, project management provides a salvage excavation team. The team will be composed of qualified archaeologist and workers.
- Once the excavation is completed, salvage excavation team provides a report to the Museum Directorate
- The relevant Regional Councils for the Conservation of Cultural Property officially confirms completion of recovery and informs the project management.
- Site will be officially recorded and protected according to Turkish regulations.
- The cultural heritage/archaeological monitoring expert/s inform to the related managers.
- The cultural heritage/archaeological monitoring expert/s records the decision on Chance Find

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	copy of Chance Find form for his/her record.	Form Part C and sends a copy to E&S manager within
>	No further actions required.	24 hours. ➤ The cultural
>	This step closes out the chance find procedure.	heritage/archaeological monitoring expert/s retains a
>	Construction activities may resume	copy of Chance Find form for his/her record.
		No further actions required.This step closes out the
		chance find procedure. Construction activities
		may resume, or preventive further actions are needed

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7. Monitoring and Reporting

The cultural heritage/archaeological monitoring expert/s will visually monitor all construction areas or other ground disturbance activities for evidence of presence of cultural heritage items. Therefore, sufficient number of monitoring experts should be assigned and kept in the construction area during the project construction period.

Chance Finds will be recorded on the Chance Find Report form. All Chance Find Report forms will be kept in hard copy at the camp and will also be scanned and saved electronically after completion of each section of the form.

Chance Finds will be recorded in the Chance Find Register which will be kept up to date by Monitoring Expert/s. It will be reviewed in regular E&S meetings (weekly or monthly).

8. Chance Find Report Form

RASLANTISAL BULUNTU RAPOR FORMU

•		ON TO KAI OK TOKWO
		RT A <i>ÜM A</i>
Project Location:	District (İlçe):	Date: Form No:
Proje Sahası	Village (Köy):	Tarih
Name of person reporting char		
Rastlantisal buluntuyu rapor e		
• • • • • • • • • • • • • • • • • • • •	ediate vicinity of the chance find?	
Rastlantısal buluntunun tam çe	-	Evet Hayır
Was a buffer zone created to p		□ Yes □ No
Rastlantısal buluntuyu koruma	k için tampon bölge oluşturuldu	•
		CATION Dirim
Site manager and E&S manag	er contacted	□ Yes □ No
Saha Müdürü ve Çevre müdür	ü ile irtibata geçildi	Evet Hayır
		ND DETAILS LUNTU AYRINTILARI
GPS coordinates GPS koordinatları Description of chance find: Rastlantısal buluntunun tanımı	,	Photo record
	, •	, ground surface visibility, distance to closest watercourse, etc.) vüzey zemin görünürlüğü, en yakın suyoluna olan mesafe, vb.)

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PART B BÖLÜM B			
	ION OF MUSEUM DII ÜZE MÜDÜRLÜĞÜ A		
Monitoring archaeologist contacted muse Arkeolog müze müdürlüğü arkeoloğu ile i	eum directorate archae		s □ No
Date of notification: Bildirim tarihi			
Name of museum directorate and Name of Müze müdürlüğü ve Müze müdürlüğü ark Contact number of museum directorate a Müze müdürlüğü arkeoloğunun iletişim na	reoloğunun ismi ırchaeologist:	gist:	
DECISION	I OF MUSEUM DIRE MÜZE MÜDÜR	ECTORATE ARCHA LÜĞÜ KARARI	EOLOGIST
Date of site visit: İlk saha ziyaret tarihi:			
☐ Site of no significance - Construction further action – End of chance find proceed			ance - Further actions required Ek araştırma gerekmektedir
Önemsiz saha – İnşaat daha fazla araştırma yapılmadan devam edilebilir – rastlantısal buluntu prosedürün sonu. Please Fill out Part C			1C
Date of notice to resume work: İşe başlama tarihi bildirisi		Lütfen Bölüm C'yi doldurun.	
Name of museum directorate archaeolog Müze müdürlüğü arkeoloğunun ismi	ist:		
Contact information: İletişim numarası			
Site manager and E&S manager contacted Saha Müdürü ve Çevre müdürü ile irtibata geçildi		□ Yes Evet	□ No Hayır
		RT C ÜM C	
		INVESTIGATION RAȘTIRMASI	
☐ Site of minor significance Önemsiz saha	☐ Site of moderate Az önemli saha		☐ Site of major significance Çok önemli saha
Describe additional work to be conducted Yapılması gereken ek işlerin tanımları	l:		
Date started: Başlangıç tarihi		Date completed: Bitiriş tarihi	
Date of notice to resume work:			

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İşe başlama tarihi bildirisi		
Name of museum directorate archaeologist: Müze müdürlüğü arkeoloğunun ismi:		
Contact information: İletişim numarası		
Construction manager contacted	□ Yes	□ No
İnşaat müdürü ile irtibata geçildi	Evet	Hayır

9. Chance Find Register

Date of Find	Summary of Chance Find	Name of Authority Notified	Action Taken	Chance Find form Completed	Status Open or Closed	Remarks

10. Contact Information

Regional Council for The Conservation of	Contact Information				
Cultural Property	Adress	Phone	E-Mail		
Ankara Regional Council for the Conservation of Cultural Property	Konya Sokak No:46 Ulus / ANKARA	(0312) 310 42 96	ankarakurul@ktb.gov.tr		
Museum Directorate	Contact Information				
Museum Directorate	Adress	Phone	E-Mail		
Museum of Anatolian Civilizations	Gözcü Sok. No: 2 Hisar Altındağ /ANKARA	(0312) 324 31 60 (0312) 324 31 61	anadolumedmuzesi@ktb.gov.tr anmedmuz@gmail.com		
Provincial Directorate of	Contact Information				
Culture and Tourism	Adress Phone		E-Mail		
Ankara Provincial Directorate of Culture and Tourism	Anafartalar Caddesi No:65/67 06250 Ulus/ANKARA	(0312) 415 48 00	iktm06@ktb.gov.tr		

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