

DOCKETED

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Comment Received From: Jamey Stillings

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Palen - on the question of glare

Please see attached PDF.

Additional submitted attachment is included below.

17 June 2014

California Energy Commission
Attention: Ms. Christine Stora

Re: Palen - on the question of glare

To whom it may concern:

I am writing as an independent documentary photographer to provide input about my direct experience flying around and over the Ivanpah Solar facility (Ivanpah). Because you are actively engaged in the process of evaluating the Palen CSP project, which utilizes a power tower design and heliostats similar to the Ivanpah project, I believe this information will be useful and relevant to the California Energy Commission (CEC).

Between October 2010 and February 2014, I undertook a documentary project about Ivanpah. During this time, I photographed 18 times over Ivanpah and took more than 16,000 photographs. Here are the specific flight dates:

2010: October 15

2011: January 14, April 21, July 28

2012: January 6, April 11, June 2, 5, & 6, October 27

2013: March 21, June 25, September 4 & 5 (2X on 5th), November 1

2014: February 3, February 13

I have flown over the site during all phases of the project, from initial construction through commissioning and full operations. Our flights originated from the North Las Vegas airport with the Jean airport often used for refueling. Each time, we flew over the Ivanpah site and extensively around the desert basin that also contains Interstate 15, Primm, etc. Our altitude ranged from 500 to 6000 feet above the site. We flew at dawn, sunrise, midday, late afternoon and dusk. Since September 2013, most flights documented flux testing or power production at the site. All flights were in a helicopter (Schweizer 300C, Robinson R-22 or R-44).

Never, during any of these flights, did my pilot express concern or disallow a request because of reflections, glint, or glare, from Ivanpah's heliostats or towers. The rule for all flights was and is *safety first*. The pilots (and I flew with four over the course of the project) always had veto over any photographic or flight request. That said, we treated the site with respect following common sense rules to avoid looking at the sun or its reflection directly. After all, it is a concentrated solar power plant focusing the sun's thermal energy with heliostats toward power towers to create electricity.


Photography from the project has been published, nationally and internationally, beginning with The New York Times Magazine in June 2012. The Library of Congress acquired a portfolio of prints from this work, believing such documentation provides an important historic look at the ongoing development of renewable energy in the United States. To view imagery from the Ivanpah project, please visit the Projects section of jameystillingsprojects.com.

Two goals of my documentary work are to create awareness and to promote constructive communication about the challenging and multi-faceted decisions we face for all new energy projects, whether for renewable energy or fossil fuel energy production.

I hope this letter can be a positive contribution to the decision-making process about Palen and other utility-scale solar projects.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamey Stillings". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail that ends in a small loop.

Jamey Stillings