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2 BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITING EVALUATION COUNCIL

3  
4 In the Matter of the Application of:  
5 Scout Clean Energy, LLC, for Horse Heaven  
6 Wind Farm, LLC,  
7  
8 Applicant.

DOCKET NO. EF-210011  
DIRECT TESTIMONY AND  
ATTACHMENTS OF EMILY  
RAGSDALE ON BEHALF OF SCOUT  
CLEAN ENERGY

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10 **DIRECT TESTIMONY AND ATTACHMENTS OF EMILY RAGSDALE**

11 **ON BEHALF OF**

12 **SCOUT CLEAN ENERGY**

13 **EXH-1004\_T**

14 **Revised 6/26/23**

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STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000, Portland, OR 97205  
Main 503.224.3380 Fax 503.220.2480

June 12, 2023

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2 **I. INTRODUCTION AND QUALIFICATIONS:**

3 Q. Please state your name, occupation, and business address.

4 A. My name is Emily Ragsdale. I am a Principal Archaeologist at Historical Research  
5 Associates, Inc. (HRA), which provides cultural resources consulting services to  
6 private and public clients for the purposes of complying with federal and state  
7 legislation. My business address is 1825 SE 7<sup>th</sup> Avenue, Portland, Oregon 97214.

8 Q. What are your job duties and responsibilities in that role?

9 A. As a Principal Archaeologist, I direct and oversee all phases of a project, including  
10 initial planning, background research, field investigations, analysis, and reporting. I  
11 supervise a team comprising a field director, crew leads, archaeological technicians,  
12 laboratory analysts and other specialists, and architectural historians. I work directly  
13 with staff to ensure accurate research, appropriate field methodology and execution,  
14 and thorough resource documentation and analysis. I co-author reports and act as the  
15 primary editor responsible for technical conclusions and justifiable evaluations and  
16 recommendations related to archaeological resources. It is my primary responsibility  
17 to ensure that HRA's work is completed according to the scope of work and to  
18 professional standards.

19 Q. What is your educational and professional background?

20 A. A summary of my education and professional experience is included as Attachment  
21 A.

22 Q. When were you engaged in this matter?

23 A. January of 2020, when HRA was first contracted to complete a desktop analysis of  
24 the project, conduct limited field survey, and assist with Tribal communications and  
25 outreach.

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1 **II. PURPOSE AND SUBJECT MATTER OF TESTIMONY:**

2 Q. For whom are you testifying and what is the purpose of your testimony?

3 A. My testimony is offered on behalf of Scout Clean Energy. The purpose of my  
4 testimony is to provide additional explanation and support for the archaeology-related  
5 sections of the Horse Heaven Wind Farm Application for Site Certification.

6 Q. Are you sponsoring any portions of the Application for Site Certification for the  
7 Horse Heaven Wind Farm or any appendices or other documents that are part of the  
8 Application for Site Certification? Please describe the aspects of the application you  
9 contributed to.

10 A. Yes. I am sponsoring Appendix R, Cultural Resource Reports.

11 Q. Are you familiar with those portions of the identified appendices of the Application  
12 for Site Certification?

13 A. Yes.

14 Q. Did you prepare these portions of those appendices of the Application for Site  
15 Certification, or, if not, did you direct and/or supervise their preparation?

16 A. Yes, I prepared and/or directly supervised preparation of HRA's reports included in  
17 Appendix R.

18 Q. Is the information in these portions of those appendices of the Application for Site  
19 Certification within your area of authority and/or expertise?

20 A. Yes.

21 Q. Are the contents of these portions of those appendices of the Application for Site  
22 Certification either based upon your knowledge, or upon evidence, such as studies  
23 and reports that reasonably prudent persons in your field are accustomed to rely on in  
24 the conduct of their affairs?

25 A. Yes.

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1 Q. To the best of your knowledge, are the contents and portions of those appendices of  
2 the Application for Site Certification true?

3 A. Yes.

4 Q. Do you incorporate the facts and contents of these portions of those appendices of the  
5 Application for Site Certification as part of your testimony?

6 A. Yes.

7 Q. Are you able to answer questions under cross-examination regarding these portions of  
8 those appendices of the Application for Site Certification?

9 A. Yes.

10 Q. Do you sponsor the admission into evidence of these portions of those appendices of  
11 the Application for Site Certification?

12 A. Yes.

13 Q. Are there any modifications or clarifications to be made to these portions of those  
14 portions of the Application for Site Certification that you are sponsoring?

15 A. No.

16 Q. How did you develop your contributions to those appendices of the Application for  
17 Site Certification?

18 A. My staff and I developed HRA's Cultural Resource Reports using background  
19 research, field surveys, and data analysis; we also sought feedback on the reports  
20 from Tribes and agencies, including Washington Department of Natural Resources  
21 (DNR) and Washington Department of Archaeology and Historic Preservation  
22 (DAHP). Background research entailed extensive review of literature, documents,  
23 webpages, and databases as described in detail below. The purpose of the background  
24 research was fourfold: first, to identify previously recorded or known archaeological  
25 and architectural resources within the project boundary; second, to formulate  
26 expectations regarding the archaeological sensitivity of the survey areas, including

1 where and what types of resources are likely to be present and how land use-history  
2 might affect that; third, to develop field methods appropriate to identifying both  
3 previously recorded and yet unidentified resources; and, fourth, in the case of  
4 historic-period resources, to provide a context for evaluating them for listing in the  
5 National Register of Historic Places (NRHP). My staff then conducted a series of  
6 field surveys led by a field director who has extensive experience completing  
7 archaeological investigations in the region and who meets the Secretary of Interior's  
8 Professional Qualification Standards in archaeology. Finally, my staff and I analyzed  
9 the results documented during the field surveys; completed additional supplemental  
10 research as needed to better understand and, in some cases, to evaluate the historic-  
11 period resources for listing in the NRHP; and synthesized the results of the  
12 background research and field surveys into five separate reports, each with project-  
13 related management recommendations for each resource and appropriate maps,  
14 photographs, and resource forms.

15 Q. On what resources, data or other references did you rely on in contributing to those  
16 appendices of the Application for Site Certification?

17 A. My staff and I relied on the following sources to develop our reports: confidential  
18 data available to qualified professionals through Washington State's digital repository  
19 (Washington Information System for Architectural and Archeological Records Data  
20 [WISAARD]), including reports, resource forms, locational information, NRHP  
21 determinations, and the DAHP statewide archaeological predictive model; DAHP's  
22 guidelines, *Washington State Standards for Cultural Resources Reporting*, and  
23 website ; personal communication with DAHP staff regarding Washington State Law  
24 and DAHP policy and procedures; guidelines published by the National Park Service  
25 for evaluating historic-period resources for listing in the NRHP; publicly available  
26 published and gray literature regarding environmental setting and cultural context,

1 ethnography, and history; soil data mapped by the U.S. Department of Agriculture-  
2 Natural Resources Conservation Service; historic-period maps detailing past  
3 environments, built features, and/or land ownership; historic-period aerial  
4 photography showing past environments and built features; historic-period land  
5 patents detailing ownership; Benton County historical tax assessor data; online burial  
6 records; historic-period newspaper articles; literature supporting precontact lithic and  
7 historical artifact identification and analysis; historical agency records provided by  
8 DNR; personal communication with landowners; and Tribal webpages and  
9 information received from Tribes through communications and comments on draft  
10 reports, including those from Yakama Nation, Confederated Tribes of the Umatilla  
11 Indian Reservation, and Nez Perce Tribe.

12 Q. On what topics in the Application for Site Certification are you prepared to testify  
13 about?

14 A. Research, survey, documentation, evaluation, and recommendations as presented in  
15 HRA's Cultural Resource Reports.

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17 DATED: June 12, 2023.

STOEL RIVES LLP

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1 **CERTIFICATE OF FILING AND SERVICE**

2 I hereby certify that on June 12, 2023, I filed an original and one copy of the  
3 foregoing **DIRECT TESTIMONY AND ATTACHMENTS OF EMILY RAGSDALE**  
4 **ON BEHALF OF SCOUT CLEAN ENERGY** with the Washington Energy Facility Site  
5 Evaluation Council, through electronic filing via email to [adjudication@efsec.wa.gov](mailto:adjudication@efsec.wa.gov),  
6 together with mailing via U.S. Postal Service, Return receipt requested, with postage prepaid  
7 to the following address:

8 Energy Facility Site Evaluation Council  
9 ATTN: Horse Heaven Adjudication  
10 621 Woodland Square Loop SE  
11 P.O. Box 43172  
12 Olympia, WA 98504-3172

13 I hereby certify that I have this day served the foregoing document upon all parties  
14 of record in this proceeding by first-class U.S. Mail (authorized method of service  
15 pursuant to WAC 463-30-120(3)) at the addresses listed below (with a copy sent via email  
16 where an email address is indicated).

17 ***Service List Attached***

18 DATED: June 12, 2023.

19 STOEL RIVES LLP

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