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RE: Stop Work Order - 4203 78th St SW, CC-2020-051
Rodriguez Property

Dear Brian:

A stop work order has been issued on the above reference property. I have made numerous site visits and done extensive research in the past 16 months on this property.

The bottom line is there are no jurisdictional wetlands on or buffering the site. What we see is a result of the church to the west discharging stormwater onto this site. On the city property to the north a berm is south of the concrete road/pathway and it backs water onto this site.

Situation

It is unbelievable that all of the following show a wetland on the site:

Skookum Kennel Site plan
A Wetland Resources Map
Pentec Environmental (Hart Crowser) for the Slavic Church
City GIS wetland map
County GIS wetland map

However the following do not show any wetland:

National Wetland Inventory Map
USDA Soil Survey

Explanation

I have worked with the City of Mukilteo with great success on difficult sites in the past and glad we have this jurisdiction.

I need to write an in depth and detailed report to explain how all these consultants and sources are in error. It will be lengthy and use the required federal manuals (1987 and

2010 Supplement) per city, state and federal code. All previous work was performed using the Routine Methodology of these manuals and it is qualitative and not the most rigorous approach. Because they used the Routine Method they ignored all the disturbance of the site.

For example, photos to the 1940's and to date give a visual history. Ditches have been dug, buildings removed, vegetation patterns show wet areas (but not wetlands) roads have been built, storm water dumped, berms created and even a pond created on the park to the north. This calls for the Atypical Methodology and looking at the historic conditions.

Thus, the Comprehensive Method of the Federal Manual will be used, it is the most rigorous and is quantitative and scientific, not qualitative and subject to opinion. The Comprehensive Methodology requires a soil scientist to map out the soils of the property. The mapping identifies any areas of hydric soils and those areas are the wetlands. This has been done and there are no hydric soils and thus, no wetland on or near the site.

Challenge

The challenge is to get a peer review of a qualified soil classifier's work; few exist. Even more challenging is that Mr. Bredberg, yours truly, is an expert in plants, hydrology, air photo interpretation, surficial hydrology, drainage, geomorphology and other areas. Biologists are normally called in to do a peer review, however biologists lacks practically all these credentials. Most biologists are wildlife and fish biologists. Before a report is submitted we need to figure out how best to handle a peer review.

The Washington DOE and US Army Corps have a similar problem in a peer review of my work. They do not appear to have access to anyone matching my credentials.,

Solution

The solution is to have Mr. Bredberg walk any reviewer through the report, including city staff and any consultant they choose. Mr. Bredberg was a college instructor teaching the basics of hydric soils to college freshman 40 years ago, which was before the wetland industry was created. As an educator, he is effective in presenting the facts, history and proper interpretation that a lay person can understand.

Conclusion

We have wetlands on the subject site, but they are created by off-site activity, not historic and should not be regulated. We will present the facts and history to document and prove this. Prior to submitting a complex report to the city, we need to figure out how everyone, city and potential 3rd party review, can work as a team to understand a very difficult site.

To make this happen I will need the files for the wetlands of the Slavic Church, next door; I am missing important elements. Do we do a Public Information Request or just ask the city unofficially. I also need the history of the Japanese Gulch Park and trail from archives if available. The report will be lengthy (well over 100 pages) and detailed (data sheets, air photos and other exhibits). Any personal knowledge of the area is welcome for staff or neighbors.

As a forensic agronomist and soil scientist, I will take the audience back through history about 18,000 years to the last glacier and show why and how what we see today looks like a jurisdictional wetland. It can be a fun ride when approached with an open mind.

Regards,

s AJ Bredberg
electronic signature

attachment

Resume

ANTHONY JAY BREDBERG
3303 43rd St. NW
Gig Harbor, Washington 98335 USA
Telephone: 253-858-7055 ajb@wa.net

PROFESSIONAL EXPERIENCE

Researcher, Soil Scientist, Wetlands Scientist, Botanist, Agronomist, Geomorphologist, Inventor

50 years performing wetland mitigation, enhancement, restoration and studies, soil surveys, agronomy, farming, farm management, site evaluation, permitting, expert witness testimony, litigation, research and publications, approved US patents and scientific discoveries.

Senior Soil Scientist, NH SOIL CONSULTANTS, Inc.

Founded and directed soil survey, mapping, and wetland division.

Consultant, BREDBERG SOILS

Agronomic consulting in conservation, sediment and erosion control, soils, pest management and agronomic production.

Administrador, EL RANCHO CENIT, Campeche, México

Administered 2,000 acre farm producing and exporting commodity crops.

Exporter, Megerani, Ltd. LAGOS, NIGERIA

Acted as US agent for exporting commodities, industrial, and agricultural supplies.

College Instructor, BLACK HAWK COLLEGE

Instructor of soils, plant identification, soil management, and conservation.

EDUCATION

MS North Carolina State University, Raleigh, NC.
Agronomy, soil and plant science. 1979.

BS Western Illinois University, Macomb, IL.
Agronomy and botany. 1977.

GRADUATE STUDIES

Soil Science University of Illinois, PhD program
Forestry University of New Hampshire, PhD program

ADDITIONAL STUDIES

Black Hawk College Augustana College
University of Massachusetts, Amherst Black Hawk College East

Qualifications of AJ Bredberg

Bredberg has superior educational qualifications, entered college at age 16, receiving a B.S. in agronomy and botany; obtained a master's degree by age 21, and was teaching college classes at the age of 22.

The M.S. thesis studied soil physics, monitoring soil hydrology with tensiometers, gravimetric, pressure plate, and other methods. Bredberg's PhD. research at the University of Illinois involved porosity and bulk density with state of the art mercury porosimeter analyzers. The University of New Hampshire PhD program involved forest soil characterization, sampling, and chemical analysis.

Since childhood he has been involved in farming and farm management; including irrigation, monitoring water levels and moisture contents. At the age of 20, he negotiated agricultural export shipments from Europe to Nigeria. By 23, he managed a 2,000-acre farm in Mexico with 300 employees exporting vegetables to the U.S. While a full-time graduate student at the University of New Hampshire, his part-time consulting generated a full time salary.

Certifications and registrations have included:

- Certified Professional Soil Scientist #02630
- Certified Professional Soil Classifier # 02630
- Professional Wetland Scientist
- USDA Technical Service Provider (TSP) # 03-2710
- Licensed New Hampshire septic designer

Bredberg has over 4,000 approved projects across the US and international experience. Clients have included:

- Wal-Mart
- Costco
- Safeway
- ARCO
- Home Depot
- Chehalis Airport
- City of Bellevue
- US Army Corps of Engineers
- Timberland
- Fred Meyer
- Teachers Insurance and Annuity Association of New York (TIAA)
- Zurn
- OPUS
- Panattoni
- Richard and William Marriott
- Muckleshoot Tribe
- Numerous public and private school districts
- Dozens of churches

Experience in legislation includes leading a statewide tour for the Washington State House subcommittee on Agriculture and Environment explaining wetland issues that led to passage of a new law, House Bill 2339, setting up wetland mitigation banking. He was instrumental in passing an amendment to Senate Bill 5065, which exempted soil scientists from the Geologist Practice Act. In 2012, Mr. Bredberg assisted in writing of Oregon Senate Bill 1582, which passed and was enacted.

Bredberg's technical expertise is unique and well documented. His company has reversed wetland decisions already approved by the Army Corps involving hundreds of acres of land. Major wetland companies have been shown to be in error after his firm has done a technically accurate review. Federal, county, and local jurisdictions have accepted and approved the corrected delineations done by Bredberg with a success rate of about 99% on about 4,000 projects.

Mr. Bredberg holds numerous patents, (US 7,988,071 B2), dealing with irrigation and uniform water dispersal. Sweden provided a grant to Bredberg so a proof of concept could be produced in Sweden. Negotiations are in the works to build a prototype in the Netherlands.

Mr. Bredberg is a noted speaker, and was a presenter at an international wetland symposium in Kuala Lumpur Malaysia and an invited speaker at a SSSA international symposium, where he presented "Case studies exemplifying the importance of including a soil scientist in a wetland functional assessment team". He presented 11 poster papers at the 2017 National Cooperative Soil Survey conference in Boise, ID.

His publication "Photographic Documentation of Soil Color Change on Exposure to Air" was cover story in the May/June 2012 issue of the Soil Science Society of America publication *Soil Horizons*.

Bredberg is not an attorney, yet Oregon Court of Appeal on case A160823 reversed a lower court decision only later dismissed by the judge as about the last act upon retirement from the bench. The case involved fraud committed by Oregon government officials.

The latest research paper presents the discovery of two previously unknown meteorite strikes, ~1,265 (Bredberg1) and ~12,800 (Bredberg2) years before present, both were 10 on the Torino scale, meaning they caused global climatic change. Bredberg1 caused the Medieval Warming Period and Bredberg2 brought the end of the ice age. Both strikes were extinction grade and would have caused worldwide extinctions except Bredberg1 struck in 5,000 feet of water and Bredberg2 struck a glacier about 2 miles thick. This is yet to be published and completely changes the paradigm of the risk posed to all species on the planet Earth,

Bredberg1 meteorite has been discovered west of Vancouver Island, Canada. This is the first evidence of water impact of a large (>1 cubic km) meteorite, it struck ~1,265 years ago. Google air imagery clearly shows the crater. The strike created a mega-tsunami similar in magnitude to the Missoula flood that put Portland 400 feet underwater ~10,000 years ago. Proof is founded on thousands of soil pits and geomorphic observations throughout the lower Puget Sound; C14 data places the strike and mega-tsunami ~1,265 ybp. Over 30 tsunami signatures have been developed allowing mapping of tsunami deposits, some of which can be done with existing soil survey data. Implications include using soil survey to map potential and past tsunami activity, climate change, loss of and changes to civilizations and revising public risks. Evidence shows the mega tsunami eliminated an unknown civilization of coastal Native Americans ~1,200 years ago, the Samish rehabilitated about 300 years later from Idaho. Bredberg has named the tribe the Cascadia civilization. (publications in preparation)

Bredberg completed field work in 2019 with Mexican Archeologists on Xihucan, a civilization decimated by a mega-tsunami 630 years ago. Bredberg discovered the date of the mega-tsunami through C-14 dating non-marine estuarine clam shells. The site is 3 hours north of Acapulco near Zihautanejo. Soil investigations confirm the tsunami was at elevations at least 65 feet above sea level and 5 km inland. (publications in preparation)

Bredberg is an expert witness without peer. He acts pro se in legal action even though he has no formal law training. The list of government employees reported for corruption and no longer working for the government continues to grow. Numerous US Army Corps, Oregon Department of State Lands, WA Department of Ecology staff have taken early retirement or simply left their jobs when their corruption was exposed. Consulting firms acting as 3rd party reviewers have suffered the same fate with cities no longer using their services when their fraudulent practices have been exposed. RICO actions in Federal Court will send shock waves through the wetland industry when the wetland syndicate of corruption is exposed and brought before a judge.