

Robert and Genevieve Hughes
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Mr. Dave Navecky
Surface Transportation Board
Docket No. FD 35952
395 E Street SW
Washington, DC 20423-0001

Dear Mr. Navecky:

Robert Hughes attended the Belvidere, Illinois meeting of the Surface Transportation Board on the Great Lakes Basin Transportation Project (GLBTP) on April 19, 2016. Genevieve Hughes attended the Rochelle, Illinois, meeting of the Surface Transportation Board on April 20, 2016. After listening to the representatives of the Surface Transportation Board, and the public comments made by local officials, farmers and other important stakeholders, we identified four critical false assumptions that need to be corrected in order to properly assess the Great Lakes Basin Transportation Project (GLBTP).

First FALSE Assumption: Farmland is an infinite resource. People can drive for hundreds of miles across the midwestern United States, and see farmland. They may easily make the assumption that we have far more than we can ever need. Hundreds of thousands of years of preparation and glacial withdrawal built one of the most productive agricultural regions in the world. Often the temptation is to see that land as “vacant” and not being an environmental or food production asset. Therefore more farmland taken for a railroad or a subdivision seems of little consequence. After World War II the suburbs of Chicago swallowed some of the most pristine farmland in the world in Cook, Lake, McHenry, Kane, DuPage and Will counties. Once land is taken for development, it can only grow one crop of houses, and not years of agricultural crops, nor can it ever be returned to a protected conservation area. The seemingly small step of okaying any railroad route is a major leap towards a legion of environmental problems over the next millennium.

TRUE: Farmland is a finite resource that must be protected at all costs.

Second FALSE Assumption: If you can make money on it, it must not be a high value environmental asset. If a farmer produces a profit on an acre of land, is it automatically a lower value asset than a wetland or a stream? The effect of this assumption is a narrow focus on making small alterations to the route in order to accommodate wetlands and streams rather than a wider focus on the entire route as a degradation of the environment. Every acre taken for this project negatively impacts the sustainability of the environment and American food production.

To better illustrate the symbiotic relationship between environmental stewardship and profitability, let's examine the property at 6250 Mulford Road, Rochelle, Illinois, 61068. Robert and Genevieve Hughes founded Hughes Hybrids, Inc. in 1967. Through breakthrough hybrids, Hughes Hybrids grew into a regional seed corn company focused on Northern Illinois, Southern Wisconsin and Eastern Iowa. In 1987, Robert Hughes, as President of Hughes Hybrids, acquired the former Del Monte sweet corn seed plant at 6250 Mulford Road, Rochelle, Illinois, 61068. As part of a division of assets in 1998, the seed corn plant became a solely owned property of Robert and Genevieve Hughes.

Since the 1930's the genetic development of seed corn was a critical component of the ability of United States agriculture to participate in the green revolution that enables two percent of the American population

(farmers) to feed not only the rest of the United States but also a significant portion of the world through exports. Each corn plant grows a male part with pollen (a tassel) and a female part with silk (an ear). Naturally corn will cross pollinate in order to renew itself genetically. This cross pollination process can also be enhanced through selective corn breeding. Pure lines of inbred corn can be developed by taking only the pollen from one plant and placing it on its own ear. Seed corn is a specialty crop that crosses two pure inbred lines of corn in a field to produce a single line cross hybrid. This hybrid demonstrates superior yield, drought and disease resistance. Since widespread adoption in the 1930's and 1940's, seed corn drove yields higher and allowed fewer people to grow more food.

The special equipment needed to prepare seed corn is threatened by the GLBTP. A special picker is required to pick the seed corn with its ears on it, and a special facility is needed to dry the ear corn. Once dried the ear corn must be shelled. This specially dried and shelled seed must be sorted into different sizes that can easily go through a farmer's planter. The seed also must be treated to guard against soil born diseases. 125 yards south of the seed corn facility at the same elevation is the east-west Union Pacific mainline. GLBTP plans to "flyover" the Union Pacific mainline approximately 75 yards west of the seed plant. This "flyover" will require at least a three story embankment that threatens the physical integrity of the special drying equipment, the bins and the buildings that produce farmer ready seed corn. Even if the route were moved further to the west the sizing and treating equipment would be compromised due to the vibrations from periodic trains so close to this plant. The proximity of the 100 plus trains a day to our seed corn plant at a height of three stories will have a deleterious effect on the physical plant and the special machinery needed to operate the seed plant. This would force the closure of the plant.

The closure of the Rochelle seed corn plant is a direct blow to the sustainability of American and world food production. The facility owned by Robert and Genevieve Hughes forms a critical part of the infrastructure of locally produced seed corn in the United States. Locally grown seed is better adapted to the environment and provides a ready source of seed for farmers without having to depend on seed shipped in from other states.

The risk of genetic concentration also threatens the sustainability of American agriculture. Without this Rochelle seed corn plant, genetic variety in Illinois will be reduced. Limiting genetic variety in American agriculture led to a massive corn blight in 1970. In a seed corn field female plants are harvested and male plants are used only for their pollen. After the male plants shed pollen they are destroyed throughout the field with special equipment. The male part of the female plant (tassel) is removed through a labor intensive operation known as detasseling. A special cytoplasm called Texas male-sterile (TMS) cytoplasm was introduced into female plants in the 1960's. This TMS cytoplasm sterilized the tassel on the female plant and eliminated the need for detasseling. Unfortunately this TMS was concentrated in genetics in the late 1960's and opened an avenue for disease to massively reduce corn yields in 1970. In two months this blight reduced average corn yields by fifteen percent across the United States. Far more dangerously it reduced many fields in the Midwest to a total loss. (For more information on page two: <http://docs.lib.purdue.edu/cgi/viewcontent.cgi?article=1106&context=larstech>) It took several years to restore yields, and world food supplies to their previous level. Closing this Rochelle plant would further reduce the genetic variety and choices available to farmers in Northern Illinois.

In addition to the seed corn facility, the seed corn fields would also be destroyed. Since Robert and Genevieve Hughes assumed control of this property in 1988, a major project of environmental enhancement was completed. Throughout the farm, where gullies developed prior to 1988, grass strips to carry water away from the soil were planted and continuously maintained. Terraces with drainage pipes were installed in order to make sure no water pooled in the field. The GLBPT destroys each field and its environmental improvements in this 140 acre farm. Furthermore seed corn fields cannot be severed and maintain their integrity because of the need to have both "male" and "female" plants in the proper proportion throughout

the fields. Although we have profited from these fields, a complete program of grass waterways and terraces not only protected but enhanced the environment.

As caretakers of this vital economic and environmental asset, GLBTP will ruthlessly economically punish Robert and Genevieve Hughes their faithful stewardship of this environmental asset and brutalize the environment through increased development.

TRUE: Farmland is both an economic and environmental asset.

Third FALSE Assumption: GLBTP is a railroad project and not a massive barrier around Chicago. Since the desire of GLBTP is to have as few crossings as possible so that trains can move at the maximum rate, the number of crossings must be reduced. The effect of this on Northern Illinois and Chicago will be similar to having a massive new river constructed with only a few "bridges" to cross from one side to the other. In addition to inhibiting the free flow of wildlife throughout Northern Illinois, all the land inside the ring will be considered part of Chicagoland and therefore open to development.

TRUE: This barrier will act as a physical and psychological border around the Chicagoland area.

Fourth FALSE Assumption: GLBTP will carry the same freight as other Chicago routes and not a new avenue to carry more hazardous North Dakota shale oil tankers. With the rejection of the Keystone XL pipeline, tar sands oil tankers from Alberta, Canada may also add to the oil tanker traffic. At 1:15 AM on July 6, 2013 a 74-car freight train loaded with North Dakota Bakken Formation crude oil accidentally rolled into Lac-Megantic, Quebec and derailed. The resulting fireball killed 47 people, and left the entire area contaminated with oil. The cleanup of this environmental disaster is yet to be fully completed. Approximately 90 miles from Rochelle near Galena, Illinois in Northwestern Illinois on March 5, 2015, a 105 car train with 103 Bakken Shale oil cars derailed and caused a massive fireball and environmental damage to the surrounding area. Both shale oil and tar sands oil tankers risk derailment and devastating environmental damage.

TRUE: GLBTP opens a new artery for cargo that will have devastating environmental effects.

Correcting the false assumptions behind the entire discussion of the Great Lakes Basin Transportation Project sheds new light on the capacity of the GLBTP to exact environmental damage not only today but for future generations. If the Great Lakes Basin Transportation Project is approved, the sustainability of American agriculture will be threatened. The loss of both a finite resource of environmentally valuable farmland and a potential food supply shrinks the base of resources for future generations without their input. A new environmental barrier around Chicago and an increase in oil railroad cars adds an unacceptable environmental risk. Therefore we are asking for the Surface Transportation Board to issue a No-Action (no-build) edict.

VOTE NO ACTION NO BUILD.

Thank you for your consideration,

A handwritten signature in cursive script, appearing to read "Robert and Genevieve Hughes".

Robert and Genevieve Hughes