

4540 South County Trail
Charlestown, RI 02813



Tel (401) 364-1225
Fax (401) 364-1238

Town of Charlestown

January 27, 2017

Ms. Rebecca Reyes-Alicea
NEC FUTURE
U.S. DOT Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

RE: NEC Future Tier 1 Final Environmental Impact Statement

Dear Ms. Reyes-Alicea:

This letter is in response to the Final EIS released by the Federal Railroad Administration for the proposed upgrade to the Northeast Corridor rail line. The preferred alternative includes the Old Saybrook (Connecticut) to Kenyon (Rhode Island) By-Pass which if constructed as proposed, will have devastating impacts on the character of Charlestown and will destroy or compromise so many neighborhoods, open space and conservation areas and historic sites that the Town is obligated to defend, as well as pass through lands held in trust by the Narragansett Tribe.

Please accept this letter as the Town of Charlestown's comments in opposition to any change in the NEC rail alignment in Charlestown.

At a special public meeting on January 10, 2017, attended by over 500 persons in unanimous opposition to the preferred alignment, the Charlestown Town Council adopted a resolution in opposition to be sent to the Federal Railroad Administration, and to specifically ask for the extension of the comment period. A copy of the resolution is attached. Since that meeting, the Town has directly received over 100 comments from town residents, impacted property owners and general citizens, all but one opposed to the by-pass. We have also received an electronic petition of opposition to the by-pass with over 2,500 signatures.

Also attached to this letter is a summary of our opposition. Please note that this is the first official input regarding the NEC Future and its alignment through our rural community that the Town of Charlestown has made. There were NO public meetings hosted by the FRA or other federal or state officials in any of the Rhode Island communities impacted by the proposed by-pass. Charlestown, in particular, would be subject to some of the most damaging impacts of this project, while receiving no direct benefit. The lack of direct engagement and collaboration with Charlestown and our sister communities on the part of FRA through the EIS process is disturbing. This lack of engagement not only seems to violate the spirit of NEPA, but as noted in

the attachment, led to significant omissions in the natural and cultural resource data of the project area.

Due to the many major insufficiencies in both the process and the contents of the Tier I EIS, the Town of Charlestown requests that the Old Saybrook to Kenyon By-Pass be removed from the Tier 1 Record of Decision, and that the NEC Future route be oriented along the current right-of-way. We support modern high speed rail service to Providence but this can happen without the construction of the by-pass through Charlestown.

Sincerely,



Mark S. Stankiewicz,
Town Administrator

cc Charlestown Town Council
 Honorable Governor Gina Raimondo
 RI Department of Administration Director Michael DiBiase
 Senator Jack Reed
 Senator Sheldon Whitehouse
 Congressman James Langevin

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Charlestown, RI 02813



Town of Charlestown

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January 27, 2017

Honorable Gina Raimondo, Governor
State House
Providence, RI 02903

RE: NEC Future Tier 1 Final Environmental Impact Statement

Dear Governor Raimondo:

This letter is to restate the Town of Charlestown's strong opposition to the section of the Old Saybrook to Kenyon By-Pass that is to transect our community as part of the preferred alignment of the proposed upgrade to the Northeast Corridor rail line, and to thank you for supporting us in opposition to this alignment.

Attached is a copy of my letter to the Federal Railroad Administration stating our opposition and requesting an extension to the comment period for the Final EIS, and a copy of the Town Council Resolution adopted on January 10, 2017.

We are opposed to any change in the rail corridor in Charlestown as there is no suitable alternative alignment that will not have devastating impacts on our community. While we support rail improvements in general as a necessary transportation alternative, we strongly oppose a project that will rip apart homes, historic neighborhoods, farms, open spaces, and nature preserves while providing the benefits to distant commuters.

Sincerely,

Mark S. Stankiewicz
Town Administrator

cc Charlestown Town Council
RI Department of Administration Director Michael DiBiase
Representative Blake Filippi
Senator Elaine Morgan
Senator Dennis Algieri

4540 South County Trail
Charlestown, RI 02813



Town of Charlestown

Tel (401) 364-1225
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January 27, 2017

Honorable James Langevin
US Representative
Summit South, 300 Centerville Road
Suite 200
Warwick, RI 02886

RE: NEC Future Tier 1 Final Environmental Impact Statement

Dear Congressman Langevin:

This letter is to restate the Town of Charlestown's strong opposition to the section of the Old Saybrook to Kenyon By-Pass that is to transect our community as part of the preferred alignment of the proposed upgrade to the Northeast Corridor rail line, and to thank you for supporting us in opposition to this alignment.

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Thank you again for your assistance and to your service to Rhode Island.

Sincerely,

Mark S. Stankiewicz
Town Administrator

cc Charlestown Town Council

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Charlestown, RI 02813



Town of Charlestown

Tel (401) 364-1225
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January 27, 2017

Honorable Jack Reed
US Senator
1000 Chapel View Boulevard
Suite 290
Cranston, RI 02920-5602

RE: NEC Future Tier 1 Final Environmental Impact Statement

Dear Senator Reed:

This letter is to restate the Town of Charlestown's strong opposition to the section of the Old Saybrook to Kenyon By-Pass that is to transect our community as part of the preferred alignment of the proposed upgrade to the Northeast Corridor rail line, and to thank you for supporting us in this effort.

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Thank you again for your assistance and for all that you do for the State of Rhode Island and the country.

Sincerely,

Mark S. Stankiewicz
Town Administrator

cc Charlestown Town Council

4540 South County Trail
Charlestown, RI 02813



Town of Charlestown

Tel (401) 364-1225
Fax (401) 364-1238

January 27, 2017

Honorable Sheldon Whitehouse
US Senator
170 Westminister Street
Suite 1100
Providence, RI 02903

RE: NEC Future Tier 1 Final Environmental Impact Statement

Dear Senator Whitehouse:

This letter is to restate the Town of Charlestown's strong opposition to the section of the Old Saybrook to Kenyon By-Pass that is to transect our community as part of the preferred alignment of the proposed upgrade to the Northeast Corridor rail line, and to thank you for supporting us in this effort.

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Thank you again for your assistance and for all that you do for the State of Rhode Island and the country.

Sincerely,

Mark S. Stankiewicz
Town Administrator

cc Charlestown Town Council

**Northeast Corridor FUTURE, Washington, DC to Boston, MA
Tier 1 Final EIS
A RESOLUTION IN OPPOSITION TO THE PREFERRED ALTERNATIVE IN
CHARLESTOWN, RI**

The Town Council of the Town of Charlestown hereby resolves as follows:

WHEREAS, the Final Environmental Impact Statement released by the Federal Railroad Administration presents a preferred alternative route as part of the proposed upgrade to the Northeast Corridor which includes a section of nearly 13 miles of new rail line in the State of Rhode Island affecting the Towns of Westerly, Charlestown, Richmond and South Kingstown, as part of the so-called Old Saybrook to Kenyon Bypass; and

WHEREAS, the proposed new rail line will principally affect the Towns of Charlestown and Westerly in Rhode Island, including 5.6 miles in Charlestown; and

WHEREAS, through lack of specific outreach on the part of the Federal Railroad Administration, the Town of Charlestown, its citizens, and impacted property owners were wholly unaware of the proposed new route alignment through Charlestown, and as a result there were no comments received from the Town or interested parties in Charlestown during the public review and comment period for the Tier 1 Draft EIS last year; and

WHEREAS, the review and outreach that the Town of Charlestown, stakeholders and active members of the community have undertaken since becoming aware of the project on or about December 18, 2016, is the first such engagement that the community has done; and

WHEREAS, the scope of this project and the impact of the route on the Town of Charlestown is significantly negative, as the proposed rail alignment will:

1. Destroy dozens of private homes
2. Decimate the historic mill villages of Burdickville, Columbia Heights and Kenyon
3. Cross land owned by the Narragansett, a federally recognized Indian Tribe
4. Fragment historic and active farmland
5. Fragment the Francis Carter Preserve, a major land holding of The Nature Conservancy along the Pawcatuck River
6. Pass through and/or destroy numerous publicly and privately owned open space otherwise protected in perpetuity
7. Require several crossings of the Pawcatuck River which has been nominated by Congress as a Wild and Scenic River
8. Lie entirely within the land acquisition and habitat management area of the recently established US Fish and Wildlife Great Thicket National Wildlife Refuge
9. Lie entirely within the EPA designated Wood-Pawcatuck Sole Source Aquifer; and

WHEREAS, the Federal Railroad Administration has provided a 30 day waiting period on the Final EIS to allow feedback on the preferred alternative which ends on January 30, 2017, a period of time which the Town of Charlestown considers inadequate to provide sufficient comments outlining in detail their opposition to the preferred alignment; and

WHEREAS, the Town of Charlestown will bear a significant burden due to loss of areas of environmental, historic, agricultural and social importance without commensurate benefits to the community as a whole.

NOW, THEREFORE, BE IT RESOLVED that the Town Council of the Town of Charlestown hereby opposes a change to the railroad alignment within its borders, and authorizes its Town Administrator to undertake the following:

1. Prepare and send a letter of opposition to the Federal Railroad Administration, along with a request to extend the comment period on the Tier 1 Final EIS to April 1, 2017.
2. Prepare and send a letter to Governor Raimondo of Rhode Island stating the Town of Charlestown's opposition to the so-called Old Saybrook to Kenyon Bypass rail alignment as proposed within its borders, and to keep the railroad on its current Right of Way, with copies to all of its federal and state legislators.
3. Prepare and send letters to U.S. Senator Jack Reed, U.S. Senator Sheldon Whitehouse and Congressman James Langevin stating the Town of Charlestown's opposition to the so-called Old Saybrook to Kenyon Bypass rail alignment as proposed within its borders, and to keep the railroad on its current Right of Way.
4. Prepare a detailed response to the contents of the Final EIS, as time may allow, including evidence of incomplete and inaccurate data and improper process, to be distributed to all involved agencies and officials.
5. Prepare and send a request to all municipalities within the State of Rhode Island, requesting support of this resolution.
6. Invite a joint resolution with our neighboring towns in Washington County.

The resolution shall take effect upon passage.

By resolution of the Charlestown Town Council
at a meeting duly held on January 10, 2017.

Amy Rose Weinreich, CMC

Attested To By
Amy Rose Weinreich, CMC Town Clerk



**TOWN OF CHARLESTOWN, RI
STATEMENT OF OPPOSITION TO THE NEC FUTURE TIER I EIS
Old Saybrook, CT to Kenyon, RI By-Pass**



Overall Impacts

The by-pass will require 5.6 miles of new railroad in Charlestown. Within this new rail corridor is the following:

Dozens of homes, three historic mill villages, including Burdickville, Columbia Heights and Kenyon, active and historic farms, including the Amos Green Farm and Stoney Hill Farm, Narragansett Tribal land, 17 private open space properties, the Francis C. Carter Memorial Preserve owned by The Nature Conservancy, and an archived Superfund site which was once the location of a nuclear processing facility.

The proposed rail by-pass is through an east-west corridor of open space that spans nearly the width of Charlestown. This section is part of an 11 mile north-south corridor of open space that extends from the Ninigret National Wildlife Refuge at the ocean, north through the state-owned Burlingame Management Area and Narragansett Tribal land, through the Frances C. Carter Memorial Preserve, and then connecting with the Carolina Wildlife Management Area in Richmond, RI. The east-west corridor also provides more wildlife and potential recreation access to the Pawcatuck River, a nominated Wild and Scenic River. The proposed by-pass will impact the wildlife corridor from the Atlantic Ocean to Richmond and beyond.

With the acquisition of the Carter Preserve by The Nature Conservancy in 2001, this area became a focus of additional acquisition by TNC, RI Department of Environmental Management, Charlestown Land Trust, and others. The purpose of these acquisitions is to build an ever larger un-fragmented area of wildlife habitat, to make open space connections to the Pawcatuck River, and to create an ever richer experience for the public who use these lands for passive recreation. The Town of Charlestown uses this area of our town as part of a package of eco-tourism destinations.

In addition the by-pass crosses the Pawcatuck River, nominated by Congress as a Wild and Scenic River, and lies entirely within the land management area of the recently established Fish and Wildlife Great Thicket National Wildlife Refuge and the EPA designated Wood-Pawcatuck Sole Source Aquifer.

EIS Omissions

The following is a detailed description of the significant parcels that were NOT identified in the Tier I EIS along the by-pass corridor from Westerly to South Kingstown. *Maps corresponding to these sites are to be sent separately.*

1. Open space, preserved in perpetuity, tribal land, farms and homes

- The Grills Preserve in nearby Westerly is underestimated. The Grill's Preserve is a 550 acre conservation area with over 2 1/2 miles of river frontage. The EIS lists this as 480 acres. The Riverwood Preserve in Westerly is omitted from the EIS data. Riverwood Preserve is part of the Westerly Land Trust's Pawcatuck River Corridor Initiative. It consists of 148 acres of woodland, rocky ridges and fresh water wetlands adjacent to the Pawcatuck River and the Boy Scout Camp.
- The Pawcatuck River and Wood Pawcatuck River are crossed several times in Charlestown and Westerly by the new rail alignment. These rivers are nominated by Congress as Wild and Scenic Rivers. They are protected from development by the ongoing Wild and Scenic study sponsored by the National Park Service. The EIS does not list any Wild and Scenic Rivers in Rhode Island.
- After passing through Burlingame Management Area, which the EIS acknowledges as an impacted parkland property, the proposed rail line passes through Hidden Meadows open space. The Town of Charlestown owns a permanent conservation easement on this 25.3 acre conservation/passive recreation area. This parcel is contiguous on four sides with larger parcels of Burlingame and a seven acre parcel of conservation land of The Nature Conservancy. Both of these protected conservation areas are omitted from the EIS.
- After passing through private homes, the rail line cuts across Burlingame Estates open space, a 31.5 acre conservation / passive recreation open space omitted from the EIS. The Town of Charlestown owns a permanent conservation easement on this property.
- The Burlingame Estates open space parcel and the Hidden Meadows open space are contiguous with the 124.6 state owned conservation land which lies between them. The new rail line passes through this state owned and permanently protected property, but it is omitted from the EIS.
- The rail line then passes through about a dozen homes before entering the 142 acre Stoney Hill Farm. This is a farm-to-table operation. They sell grass fed beef, pork, chickens, eggs and Thanksgiving turkeys at the farm and at farmers markets. The farm is enrolled in the Rhode Island Farm Forest and Open Space (FFOS) program. Under this program the farmer has given up the right to develop the land for an extended period, usually 15 years or longer. Protecting, preserving, and promoting this type of farming operation is a priority of both the town and the state. This farm and its important status are omitted from the EIS.

- The rail line then passes through, or adjacent to, another farm. The farm is 15.4 acres, contiguous with the Stoney Hill Farm and also nearly contiguous with tribal conservation land across Kings Factory Road and Shumankanuc Road. This farm is omitted from the EIS.
- Another wooded area contiguous with the Stoney Hill Farm is a 45 acre property recently placed into a permanent conservation easement held jointly by The Nature Conservancy and the Charlestown Land Trust. In December of this year The Nature Conservancy announced the new conservation easement as follows: *"The 45 acre Heinz property is just southwest of the Carter Preserve, and contributes to a growing corridor of conservation along the Pawcatuck River."* This conservation easement does not appear to be in the direct path of the train but it is close by and contiguous with other farms that are. This wooded area and its status as legally protected/conserved land is omitted from the EIS.
- The rail line then crosses Shumankanuc Road and enters Narragansett Tribal land. The Tier 1 Final EIS claims that no tribal land is crossed or impacted by the plan for high-speed rail anywhere in the corridor from Washington DC to Boston. But in this case, tribal land is crossed and that land also is protected by a conservation easement.
- The proposed rail line then crosses a 59-acre farm contiguous with the Pawcatuck River and the Carter Preserve. This farm is omitted from the EIS.
- The new rail line then crosses Kings Factory Road and the Botka Woods Open Space. This 116 acre open space has been recently approved for a permanent conservation easement to be held by the Town of Charlestown.
- After passing through the power line (green way) and four or five houses, the proposed rail line enters the 1,112-acre Francis C. Carter Memorial Preserve. Owned by The Nature Conservancy this property was acquired with help from the Champlin Foundation, the Doris Duke Charitable Foundation, and the Cove Point Foundation. This preserve is one of the largest protected properties in the state, but it was entirely omitted from the EIS. It joins several thousand acres of contiguous forest and contributes to an 11-mile corridor of open space running from the Ninigret National Wildlife Refuge to the state's Carolina Management Area. This conservation property has a strong policy supporting public access for passive recreation. There are seven miles of hiking trails, access for equestrians and bow hunting in season. The proposed rail lines run the length of the Carter Preserve fragmenting it into two roughly equal pieces.
- All of the land between the existing rails, the proposed rails, and tribal land is occupied by the Carter Preserve. NEC Future has made clear a preference to avoid tribal land. For the railroad in the Carter Preserve there is no place to move the rails to avoid parkland conversion except into the existing NEC right-of-way or across more tribal land. The new rail line leaves the Carter Preserve at Route 112, passes through three or four frontage lots on Route 112 and then enters the Amos Green Farm. The Amos Green

Farm is a colonial era farm that is preserved in museum quality and is still a private residence. The 101-acre farm is preserved with conservation easements held by the Charlestown Land Trust. It has recently been the site of Colonial re-enactments sponsored by the Charlestown Historical Society and is open to the public for other special events.

- The Fenner Farm is contiguous with the Amos Green Farm. Fenner is an 85-acre farm protected by a permanent conservation easement held by the Town of Charlestown. The two permanently protected farms make up about 185 acres of contiguous farmland that will be fragmented by the proposed rail line. None of this permanently preserved agricultural land is included in the EIS.
- Moving eastward the proposed route leaves protected open space and passes through or over residential land and then enters the Columbia Heights Historic District. This Historic District is another data omission in the EIS. Historic homes will be removed here for at-grade rail. This very compact neighborhood is eligible for inclusion on the National Register of Historic Places.
- The straightened tracks proceed on a half mile bridge from Columbia Heights to the village of Kenyon, Richmond where many homes are impacted. An aerial structure for the rails over Kenyon will be seen from the Shannock Historic District, which is listed on the National Register of Historic Places.
- The Biscuit City Fishing Area, a Pawcatuck River access point fishing area was developed with Federal Fisheries funds and RI Division of Fish and Wildlife funding. This access will be removed by the new rail project. The new rail line will pass through here as it reconnects with the NEC in the Great Swamp Management Area.
- Other farms impacted are Riverside Farm, Oak Farm, High Meadow Farm and Sweetwater Farm. If any farmland in this area remains after construction, the land will be close to the trains and noise and vibration from passing trains may make this land unsuitable for the types of farming in this area, which is dominated by animal husbandry, grass fed beef, chicken and animal feed.

2. **Narragansett Tribal Lands.** The EIS did not identify property-specific tribal resources. The proposed route passes over tribal land at Kings Factory Road. This parcel was formerly part of the Indian Cedar Swamp Management Area, a RI state wildlife management area. When it was transferred to the Tribe in 1978 as part of the Settlement Act, it was transferred with a permanent conservation easement that requires the land always remain conservation land and not ever be developed.
3. **United Nuclear Corporation (now the TNC Carter Preserve) ground pollution.** The EIS does not identify the former United Nuclear Corporation site which is an archived superfund site. Now owned by The Nature Conservancy, this land was the site of a nuclear processing facility. The UNC plant, which opened in 1964, used chemical processes for the recovery of

uranium from spent fuel rods. Following the closure of the plant in 1980 it was considered as a suitable location for industrial research and development. However, the presence of hazardous material made that impracticable. Following a ten year decontamination effort it was considered safe in 1995 by the Nuclear Regulatory Commission. However, the by-pass as proposed will disturb a tremendous amount of radioactive contaminated soil in this area.

4. **US Fish and Wildlife Great Thicket National Wildlife Refuge.** The recently approved Great Thicket National Wildlife Refuge is not mentioned in the EIS. The US Fish and Wildlife can purchase up to 3,200 acres in southern Rhode Island to protect habitat.
5. **Wood-Pawcatuck Sole Source Aquifer.** The impact on drinking water in all of southern Rhode Island was overlooked in the EIS. This will be disturbed by both construction and new rolling freight.

6. Cultural Resources and Historic Properties

The EIS omitted mention of three National Register listed properties: the Old Lyme Historic District in Connecticut; the Bradford Village Historic District in Rhode Island; and the Shannock Historic District in Rhode Island. There are additional historic districts in Rhode Island, including the Westerly Downtown Historic District, the Columbia Heights Historic District and the Kenyon Historic District in Richmond, RI. The very significant impact on Columbia Heights is not mentioned in the EIS. The Columbia Heights Historic District is on the RI Historical Preservation and Heritage Commission list, and is eligible for listing on the National Register. Twenty or so historic bungalows would be removed in this very compact neighborhood which dates to 1918 as a mill village of worker housing. In addition, the aerial structure for the railroad over Kenyon will be seen from the Shannock Historic District, which is listed on the National Register and from Columbia Heights as well. Kenyon Historic District is also eligible for listing on the National Register.

Other Impacts

Environmental Justice: Impact on the Narragansett Tribe (a minority community) and Columbia Heights (an eligible low/moderate income community) is not mentioned. These are both environmental justice issues that were omitted from the EIS.

Tunnel Impacts on Train Speed: If the tracks are straightened, a tunnel will have to be bored in Charlestown under Shumankanuc Hill. According to Amtrak, the train speed limit will have to be reduced to 80 to 90 mph in the tunnel due to a “piston” effect that would cause the train windows to implode at higher speeds. The Charlestown Police Department has measured the current Acela speeds at 97 to 102 mph passing through Charlestown. As a result, the negligible gain in speed will not justify the resulting destruction and financial costs.

Noise and Vibration: The EIS defined the “affected environment” as a 5,000-foot-wide swath centered along the preferred alignment. Increased noise and vibration would be experienced along the route. Wild animals and farm livestock would be disrupted greatly.

Public Health Effects:

The following effects were identified in the EIS as having the greatest potential risk to public health:

- Degradation of water quality, including public drinking supplies
- Disturbance of hazardous waste and contaminated materials
- Increased or prolonged exposure to noise and vibration
- Temporary construction related effects on air quality, such as fugitive dust emissions and operation of construction equipment and disruption in traffic during construction

Summary

Irreversible and Irretrievable Commitment of Resources: With the exception of leaving the rails in the current NEC, there is no alternate route in Charlestown that will not go through Narragansett Tribal land, homes, neighborhoods, farms, the Carter Preserve and other open space. Loss of these natural and cultural resources cannot be mitigated and they cannot be replaced, ever.

As some of the letter writers to the Town have stated:

“To destroy people’s homes and properties and wetlands for the sake of saving a few minutes of commute time is preposterous.”

“Like burning a log, once you take out the wild places, the historic places, the cultural places – you cannot put them back. You are only left with a pile of ash.”

“In our affected Rhode Island and Connecticut communities, we have made extraordinary efforts, at great public expense, to protect historical, cultural and environmental resources, supposedly in perpetuity, in order to support the health and quality of life of people, wildlife, and ecosystems in these communities. While I believe public transportation is critical and must be improved, I don’t think that 45 minutes saved for a few people is worth the great environmental, economic, and social disruptions that are sure to result from this plan.”