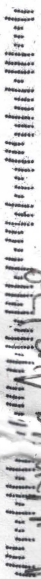


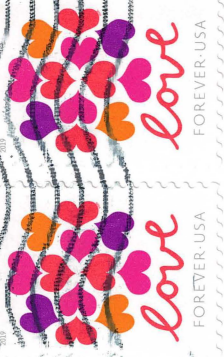
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BUM
c/o Nicole Hayes
Coastal Plain Oil & Gas Leasing Program EIS
222 W. 7th Ave. Stop #13
Anchorage AK 99513-7504

99513-750413



February 14, 2019

Dear BLM:

Please consider my comments on the Draft EIS for development of the Arctic National Wildlife Refuge (ANWR) and its coastal plain. I hope they help lead to an informed decision and one that responds to our national priorities and is in the public interest. I lend my voice to other people who care, the future generations, those rendered speechless by emotions, and our environment.

National Treasure. Irreversible-Irretrievable Commitment. U.S. Federal Indian Policy. ANWR and its coastal plain is a national treasure and its fate should not be determined just by those in Alaska or those that seek to profit from its development.¹ Based on their statements,² I do not think Alaska's representatives know that they have a treasure in their state:

The Arctic plain is really nothing... It's not the heart, it's not the heart! In actuality, what you are talking about is tundra, known in most parlances a wasteland.

The Gwich'in people have shown us something entirely different:



Source: <http://ourarcticrefuge.org/take-action/>

Based on my life experience, I am convinced that connectedness to nature is critical for the well-being of ourselves, our children, and the future generations. We must save our nation's last wild places wherever they exist. I am from California, have traveled internationally, and resided in several states including Alaska, Hawaii and Vermont. I have seen many beautiful and inspiring places. Alaska is truly the most beautiful place I have ever seen and the *only* place I have felt inspired, at peace, and free. In Alaska, I realized what I lacked as a child growing up in the greater L.A. area - access to *wild* places and the knowledge that intuitively flows from understanding nature by just being in it. When in Alaska, it occurred to me the people there care about the environment because they are connected to it - they use it/rely on it for their livelihoods/happiness. It is unacceptable that we continue to knowingly/intentionally chip away at the last wild places in the name of necessity and memorialize/document the things that used to be for the benefit of future generations. The legacy left for me is a stuffed California grizzly bear in a museum, few of any places to fish (non-native trout), and a concrete-lined L.A. River. I have heard stories about how grand California used to be - salmon, steelhead, and where grizzlies larger than those of Alaska roamed. My dad used to fish for steelhead in Malibu Creek and still laments about the end of that fishery. While living in Lompoc, I learned about

¹The Arctic National Wildlife Refuge is the biggest and the wildest land publicly owned by the United States. The section of 1002 is located on the coastal plain where many of the Arctic's diverse wildlife species reside. https://en.wikipedia.org/wiki/Arctic_National_Wildlife_Refuge

² <http://www.patagonia.com/the-refuge.html>

the steelhead that used to run the Santa Ynez River, bringing money into town and giving kids something to do. Our last wild places exist in pockets and often when we visit we can only look and not touch. The post baby boomer generations have been burdened enough (e.g., student loans at high interest rates, Great Recession, living with parents into our 30-40s, no families of our own) and we need wild places to recharge. We have never experienced the good old days we hear about from our parents and grandparents and are tired of seeing pictures of things the people of the past enjoyed at our expense. California once had wildlife and wild places in abundance like Alaska. In fact, California used to be considered the last frontier. Because I have seen Alaska, I can imagine how grand California must have been and why I am troubled by what happens in Alaska.



Monarch died in 1911. Source: Wikipedia (https://en.wikipedia.org/wiki/California_grizzly_bear)

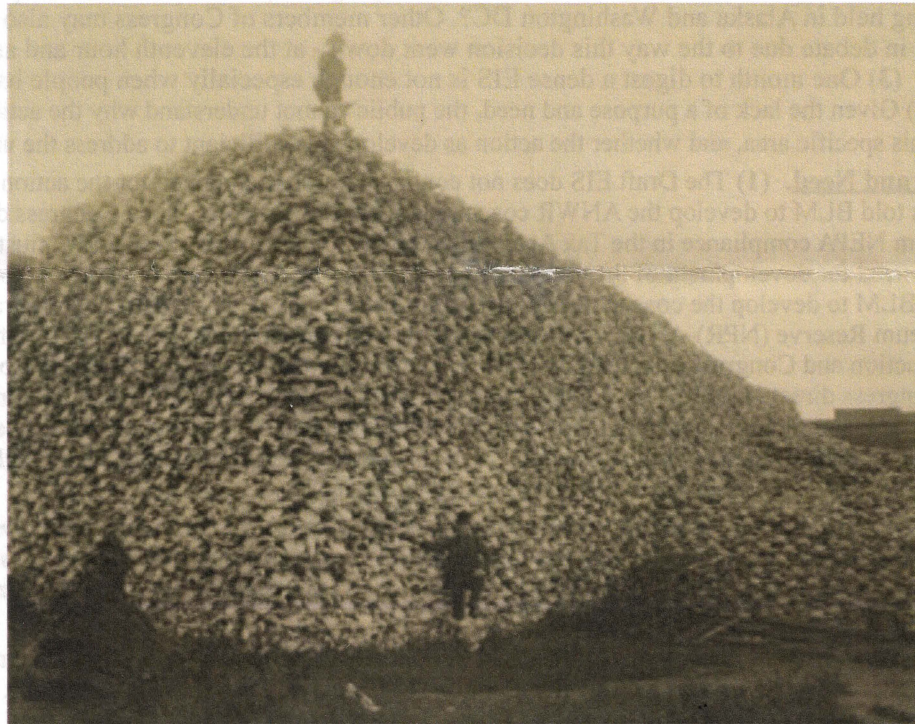


Claude M. Kreider fly fishing for steelhead trout on the Santa Ynez River in 1942.



Source: Lompoc Valley Historical Society Facebook Page and <https://yankeebareno.com>.

We owe the protection of ANWR and its coastal plain to each other, our children, the future generations, and the Alaska Natives that survived despite the past U.S. policies focused on the extermination of native people.³ As a reminder of some methods used in trying to bring an end to native peoples - take away their children (boarding and residential schools); prohibit the native language; and destroy their ability to be self-sufficient (e.g., decimation of buffalo). Basically, sever the people from their culture. The picture below has haunted me since I was a kid - the devastation and that the people in it are proud of themselves.



Mid-1870s. Source: https://en.wikipedia.org/wiki/File:Bison_skull_pile_edit.jpg⁴

That the Gwich'in people continue to exist in Alaska, as they always have, is truly remarkable. The Gwich'in have told us they are of the land and the caribou.⁵ What happens on the coastal plain affects more than just the area identified on the BLM maps. The Gwich'in traditions and customs are tied to Alaska, ANWR and its coastal plain, and the Porcupine Caribou herd. I have been told that we are in the era of sovereignty.⁶ Developing the coastal plain in disregard of the Gwich'in is surely to be a new tragedy written about in the Federal Indian law textbooks. I wonder what we would call this new era? Tragic for us would be the lost values and ecosystem services provided by ANWR and its coastal plain, but the greater tragedy as a human race would be the loss of the Gwich'in. Although we might not will the destruction of the environment or each other, it may be that it occurs when we are indifferent or silent at the moments that matter. I would suggest that the Gwich'in are letting us know that one of those moments is upon us now.

³ Removal, assimilation, reorganization, termination. See Federal Indian Policy, available at: www.wikimedia.org.

⁴ See also, <https://www.smithsonianmag.com/history/where-the-buffalo-no-longer-roamed-3067904/>

⁵ See the Gwich'in 2012 Resolution, available at: www.ourarcticrefuge.org

⁶ Interestingly, Wikipedia indicates that the Self Determination era ended in 1985 (see footnote 4).

National Concern, Public Involvement: (1) I feel like I am living the history I read about, the time before NEPA was enacted, where the government made decisions behind closed doors and essentially told the American people - *don't worry, trust us, we are doing what is best for you*. The shock and dismay I had after learning that the Tax Act authorized the development of the ANWR coastal plain is the same speechlessness I experienced after reading the case about the Tennessee Valley Authority and the snail darter. This cannot be the way our Congress governs on important national matters. (2) The American public outside of Alaska have been excluded from scoping and public comment. Why are meetings only being held in Alaska and Washington DC? Other members of Congress may also have not participated in debate due to the way this decision went down - at the eleventh hour and as part of the Tax Act. (3) One month to digest a dense EIS is not enough especially when people have jobs and lives. (4) Given the lack of a purpose and need, the public cannot understand why the action is necessary, why in this specific area, and whether the action as developed is sufficient to address the underlying need.

Purpose and Need. (1) The Draft EIS does not contain a purpose and need for the action except that Congress told BLM to develop the ANWR coastal plain per the Tax Act. Since Congress did not exempt BLM from NEPA compliance in the Tax Act, which they could have done, then BLM must develop a purpose and need for development of the coastal plain. (2) What happened in our nation to cause Congress to direct BLM to develop the coastal plain? Congress directed BLM to implement a program like National Petroleum Reserve (NPR)-A. NPR-A came about at a time when the U.S. was shifting from coal to oil/gas production and Congress directed the BLM to conduct oil and gas leasing in an appropriation act.⁷ In 2017, Congress directed BLM to conduct oil and gas leasing on the ANWR coastal plain in the Tax Act, but the U.S. is not facing any national crisis except how to reduce dependency on fossil fuels and adapt to and slow down the effects of climate change. It seems that this project captures the struggle - the resistance to inevitable change. As eloquently explained by Elon Musk:

Sustainable energy will happen no matter what.... It will have to happen out of necessity. It is tautological. If you do not have sustainable energy, it means you have unsustainable energy; eventually you will run out.... The lowest economics will drive civilization toward sustainable energy - inevitably....⁸

Given this, is it futile to resist change? It seems like Elon Musk could assist BLM and Congress in brainstorming alternatives to oil and gas development in Alaska and still provide Alaskans jobs. I mention Elon Musk because he is the only person we Americans hear about doing novel things and creating jobs in the renewable energy sector. (3) Is an idea based on U.S. energy policy circa 1991 what our country needs today? (4) Is jobs a valid need to enter into our last wild and protected places? If so, what about other people in the nation that need jobs? During the Great Recession, California did not open up protected areas to development even though we had high unemployment, including myself for almost 2 years. The Recession ended and I am grateful my elected representatives did not entertain such an idea.

Scoping Issues. (1) The Draft EIS includes a list of issues the BLM considers outside the scope of the EIS; however, these are normally within the scope of an EIS (consideration of alternatives based on a purpose and need) and agencies are required to consider alternatives/mitigation outside the agency's jurisdiction in the event Congress may intervene. This may still be possible since all members of Congress may not have had the opportunity to debate this issue. (2) If BLM has a narrow view of the scope of the EIS, how did this view affect the scope to tribal consultation?

Tribal Consultation. Alaska Natives are not to be consulted as an ordinary member of the public. Tribal outreach, coordination and consultation should be initiated at the earliest time possible when the agency is developing a proposed action so that tribal concerns can be addressed. Normally, this occurs prior to scoping and not during meetings open to the general public. Please explain how the action was developed with tribal input. What protection measures or modifications did you make to the proposed action as a result of pre-scoping tribal involvement? No information is provided in the EIS on the outcome of consultation or concerns of the tribes.

⁷ https://en.wikipedia.org/wiki/National_Petroleum_Reserve-Alaska

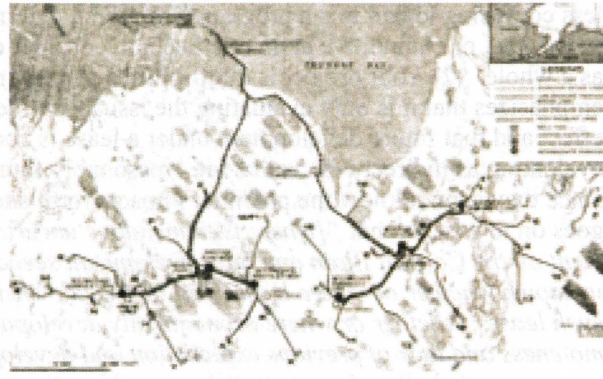
⁸ https://www.ted.com/talks/elon_musk_the_future_we_re_building_and_boring?language=en

Scope of the Proposed Action & Environmental Analysis. (1) The Draft EIS is confusing. It may be less confusing to call this a program EIS. First, determine the scope of the action to be analyzed (similar, connected, or cumulative actions). Second, consider direct, indirect, and cumulative effects of the action as a whole. (2) Your project is multi-phased project, not an issue of indirect effects. (3) The Draft EIS emphasizes that it is only evaluating the issuance of leases and that this action can have no environmental effect and that future development under a lease is considered an indirect effect. As a result, the BLM is evaluating as indirect effects that are “reasonably foreseeable” using a hypothetical development scenario since they cannot know the potential impacts from site-specific proposals not yet in hand. The Draft EIS goes on to explain that “[t]here is tremendous uncertainty regarding potential exploration and development on the Coastal Plain and any development scenario at this point is highly speculative given that it is unknown whether or where leases will be issued, whether or where exploratory drilling may occur under such leases, whether or where economically developable oil and gas discoveries may be made, the remoteness and lack of previous exploration and development of the Coastal Plain as well as its harsh environment and challenging engineering considerations, and the extended time it has taken to go from leasing to development in other regions of the North Slope of Alaska including in the National Petroleum Reserve-Alaska (NPR-A).” But, the Draft EIS also explains that issuance of the lease confers a right to drill and extract subject to reasonable regulation. Based on your explanation, the various phases appear as connected actions or cumulative actions; meaning that together they constitute the “proposed action” to be analyzed. Indirect effects are those that occur later in space and time (e.g., the clogging of streams and fish habitat from siltation that resulted from years of sedimentation caused by upstream erosion). The use of the following terms/language cause confusion and appear misplaced as they are understood under NEPA: “reasonably foreseeable,” “speculative,” and “uncertain.” The subsequent phases (exploration, drilling, extraction) are not a separate projects to be considered in a cumulative effects analysis (e.g., reasonably foreseeable future actions) since they are parts of the leasing program to be implemented. Agencies are not required to speculate, but are required to address uncertainty. BLM is not dealing with a speculative analysis situation. Despite lack of a site specific proposal, the agency can look to how exploration and drilling is normally done, which is probably how you developed a hypothetical scenario and limitations/ROPs. NEPA is speaking to uncertainty with impacts/analysis. As to issuing leases, there is no uncertainty per Congress - BLM will issue the leases and the lease confers a right to drill and extract. (4) Delete all occurrences of the paragraph similar to the one pasted below, after you explain it the first time. Just state the scope of resource analysis (underlined) and get on with it: *Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. Such post-lease activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain. Therefore, the analysis is of potential direct and indirect impacts on solid and hazardous materials from on-the-ground post-lease activities.* All this extra repetition results in the main points being buried and lost in the EIS, requiring the public to work harder reading the EIS. Most of us area reading this after work and only have 1 month to review the EIS.

Proposed Action. (1) Could you clarify what is/is not part of the action and what is/is not to occur upon issuance of a lease? Specifically, Draft EIS Table 2-2 speaks to both seismic and exploratory drilling as subsequent phases, but in the news recently we heard seismic testing was underway this month in the ANWR coastal plain until it got delayed due to inability of obtaining DoI authorization. How is seismic testing being considered outside of the EIS process? (2) It is difficult to comprehend the EIS Maps 2-1 to 2-8 without overlaying hypothetical infrastructure. I understand BLM does not have a site-specific proposal to analyze, but you could make some reasonable assumptions. Your ability to present lease stipulations/ROPs on maps suggests you have some idea. You could also look to the Prudhoe Bay Project EIS⁹ and Google Earth.¹⁰ The conceptual looks pretty accurate as to what actually happened on the ground.

⁹ https://www.arlis.org/docs/vol1/AlaskaGas/Report/Report_FERC_1980_PrudhoeBayFinalEIS.pdf

¹⁰ Google Earth (accessed February 13, 2019).



Alternatives. (1) Is this action the only solution to the underlying need? Why are Alaskans given a choice between two extremes - develop in the most pristine places for jobs, or no jobs? (2) If Alaskans need jobs, alternatives exist in the energy sector and outside it. In the energy sector, look to CIRI's Fire Island wind farm and the Municipality of Anchorage's methane gas plant. Look also to California, a leader in environmental protection and innovation. Call Elon Musk. (3) Also, instead of developing the coastal plain for oil and gas, why not leverage its existing values that, in my opinion, occur nowhere else in the U.S? This is an obvious renewable resource. Allow Alaskans and Alaska Natives to engage in recreation and cultural based tourism in ANWR. This has impacts, but is better than oil and gas development. Last time I checked into doing a hunt in the Brooks Range, it was a minimum of a few thousand dollars per person for an unguided hunt (just the flight). (4) If developing ANWR is Alaska's only solution to an Alaskan job need, I would think the nation would support an alternative program to put Alaskans back to work similar to programs developed in the past (New Deal), in effect now (subsidies for farmers), or what other state like California are pursuing - alternative energy. For other alternatives, see report 2018 CRS report for Congress.¹¹ (5) If the project is approved, please select the no action or the alternative most protective of the environment.

Lease Stipulations & Required Operating Procedures. (1) Draft EIS Maps 3-10 to 3-27¹² show an area with high biodiversity of the top species and doesn't even capture the species lower on the food chain that sustain those species. Even with the best of intentions, I do not think the measures will be effective to preserve the species and habitats. Every section I read in the Draft EIS tells of the devastation to come. (2) Table 2-2 is very lengthy; are all these ROPs and limitations applicable to this project or are these the entire gamut of ROPs/limitation that BLM uses generally? For example, the Draft EIS says that close to 100% of the project area is a wetland; does it make sense to have a ROP for floodplains since wetlands by definition are at least seasonally flooded? (3) Could you integrate a bottom line assessment of the effectiveness of the proposed lease stipulations and operating procedures (qualitative or quantitative), based on past similar projects, to help reader understand whether any of these many measures would be effective?

Data Collection. (1) Subsistence surveys in Arctic Village (Draft EIS, p. 3-165, 3-189). If you are doing an EIS, then data collection is part of the deal (unless cost is exorbitant), so why did BLM not conduct household survey of Arctic Village to ensure analysis of effects to subsistence resources based on accurate data? (2) The Tax Act merely states that Section 1003 of ANILCA shall not apply (the prohibition against development was lifted). The other sections of ANILCA are still valid. ANILCA Section 1002 has a list of requirements before any informed decision is made. Congress did not exempt

¹¹ <https://fas.org/sgp/crs/misc/RL33872.pdf>

¹² <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPattern-Page¤tPageId=152110>

BLM from other legal compliance or direct BLM to violate any law in implementing the Tax Act direction. Did BLM fulfill ANILCA's other requirements (e.g., studies) prior to issuing the Draft EIS?

Environmental Consequences. (1) Over how many years will this project provide job? - no estimate in Draft EIS, p 3-234? The EIS explains uses a 50-year cradle-to-grave timeline, but it is not clear how many years of work that will provide the number of jobs estimated in the EIS. Will Alaska Natives get job preference or be training to be able to qualify for a job since they are the ones being displaced/adversely affected from the project? When I lived in Alaska, I met many people that came to Alaska to work in oil for the high pay, but actually lived in the lower-48. (2) The environmental justice section difficult to follow because it deconstructs the topic and meshes the discussion with other requirements (CEQ Guidance on environmental justice and Government-to-Government consultation). It is not focused on the requirements of the E.O. specifically. Based on their outcry, are the Gwich'in a minority and low income group that is being disproportionately affected by the proposed action? Consider whether: their customs and traditions are at a risk of loss; they would be affected to a different extent than other Alaska Natives; Gwich'in would be able to continue living off of the land or would they be placed into financial hardship by greater reliance on store bought food. What is the significance of the assumed 19% reliance of Arctic Village on subsistence resources if it is lost? A BOEM report indicates that in 1986, Chevron/BP and Kaktovik Inupiat Corporation drilled a well on ASRC lands within the 1002 Area of ANWR and this information is still confidential status with some exclusive rights held by Chevron/BP.¹³ Given this, proximity to the coastal plain may not necessarily be a measure of who is most impacted from an environmental justice perspective if the community of Kaktovik has alternative means to support themselves. The E.O. explains BLM could seek a presidential exemption from compliance. (3) It seems that a project occurring in polar bear coastal denning and feeding habitat, combined with other projects in the area and climate change, would jeopardize their continued existence and hasten its path to extinction; already projected to occur in our lifetime without the project.

Indirect Effects. Please analyze: (1) Increased bear mortality from self defense of workers on the coastal plain. (2) Decline of big game hunting opportunities for Americans that may result from declines in species, their habitat, and prey. Alaska is the last place we can go to hunt for really any species, including big game, and refuges are critical places for the species to recover. Both the Central Arctic and Porcupine Caribou herds use the project area and I have heard that only the Porcupine is not in decline. (3) Consider the precedential effect that this action has upon our other protected lands in the U.S. If Alaska needs jobs, then what prevents other states from entering their public lands to provide their residents with jobs? (4) Would the action start the slow unraveling of the environment and culminate in the loss of Gwich'in customs and traditions and ultimately their culture?

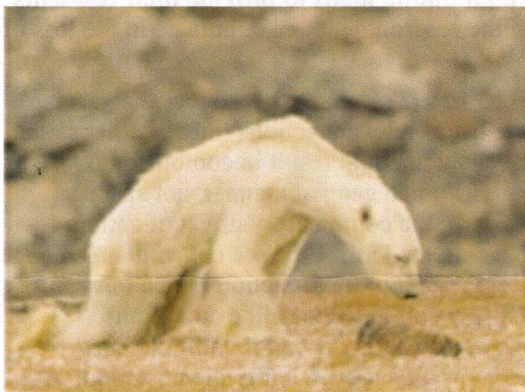
Cumulative Effects Analysis & Cumulative Effects Project List. (1) Cumulative effects analysis is general, cursory, and not project-specific. First, determine the list of relevant actions (means other state, federal, private projects) that in combination with the proposed action could result in combined effects breaching a level of significance. Table F-1 just speaks to activities in a general manner, not specific projects. After developing your project list, then focus the CEA on the combinatory effect of certain actions with the proposed action. Do this rather than what appears in the Draft EIS (see e.g., climate change analysis at p. 3-9). The CEQ does, however, allow for some aggregation of past actions since this aspect of an analysis is sometimes problematic as past actions may also result in the baseline conditions. (2) Statements of "no cumulative impacts" does not make sense since no action is continuation of past/present effects - I assume things will still go on affecting the environment even under the no action. A more plausible statement would be - *there is not potentially significant cumulative effects warranting further analysis, although effects would continue to accrue from specific past/present actions.*

Site-Specific NEPA Analysis vs. Permit Administration. (1) The Draft EIS emphasizes that the proposed action is only the issuance of leases and that future NEPA analysis would be required. But, the EIS suggests that BLM may handle some determinations as a permit administration matter (e.g. waiver, exception, modification, reasonable requirements under the regulations). Could future, anticipated, site spe-

¹³ https://www.boem.gov/uploadedFiles/BOEM/Oil_and_Gas_Energy_Program/Resource_Evaluation/Reserves_Inventory/2009DOENorthstarPotential.pdf

cific NEPA analysis be overcome by an internal BLM finding that the future actions are within the scope of the existing NEPA or are to be handled within the existing permit as a permit administration matter? (2) To what extent would site-specific actions be within the scope of this EIS such that the public would not get another opportunity to comment? (3) It seems that this Draft EIS is more of a program EIS and future site specific proposals would be able to tier from it or be within its scope.

National Priorities, Climate Change. Climate change appears to be the pressing issue of our time, but I do not see action. Even the children of the present generation are demanding action.¹⁴ Rather, I see Congress directing an agency (likely underfunded and understaffed) to use taxpayers dollars to develop the coastal plain in disregard of the adverse effects already playing out in our world and the arctic as a result of or exacerbated by the effects of climate change (e.g., melting permafrost and sea ice). On my last trip to Alaska in 2016, I saw the subsidence along the Dalton Highway from the melting permafrost; the highway is sinking into the ground/dropping in elevation. I have also seen the substantial subsidence occurring in the ANWR, as documented on the most recent season of *The Last Alaskans*.¹⁵ I have heard about the melting sea ice and how the American polar bear will be extinct sooner than thought.¹⁶ If polar bears are already under stress, how much quicker will the extinction of the American polar bear be if we also develop its coastal habitat located on ANWR's coastal plain? Why is there no outcry about this, but a swift backlash against National Geographic when they published a picture of an emaciated polar bear because they could not prove it was dying as a result of climate change? The reality is that if polar bears cannot feed as a result of melting sea ice or because they are forced out of their coastal arctic habitat, then the pictures below may be what we start seeing in Alaska. It is also possible that this is already occurring, but no one is documenting or sharing these images. It is important to see and share these pictures because it is only when we are confronted with reality will we begin to change; the first step is to acknowledge there is a problem. Why is BLM being directed to develop one of our last wild places that contains iconic species that rely on the arctic as a refuge during a portion of all of their life, e.g., polar bear, whales, seals, grizzly bears, wolves, wolverines, migratory birds? The action would alter other things as well - a marine protected area, wild and scenic/eligible rivers, and 96 percent of the project area is a wetland or other Water of the U.S. The Draft EIS demonstrates that the project area contains high biodiversity and is a critical place for the continued survival of many species, especially the resident species.



Source: <https://www.cbc.ca/news/canada/north/emaciated-polar-bear-response-1.4788259> & <http://www.kait8.com/2019/02/11/polar-bears-invade-russian-town/>

¹⁴ <https://www.ourchildrenstrust.org>

¹⁵ <https://www.discovery.com/tv-shows/the-last-alaskans/>

¹⁶ https://www.washingtonpost.com/news/energy-environment/wp/2017/01/09/without-action-on-climate-change-say-goodbye-to-polar-bears/?utm_term=.10c1901f5fe5

Besides climate change, there are a whole host of other issues affecting our country and world that we could address. While living in Hawaii, I saw the effects from plastics in our oceans (e.g., micro-plastics on Oahu's beaches and the island of dying birds on Midway Atoll - adult birds eating plastic die in place and their chicks are left behind). The problems facing our environment do not just affect wildlife. Plastic is now starting to be found in our drinking water.¹⁷ The Gwich'in have told us - "[w]hat befalls the caribou, befall the Gwich'in." I think this insight applies to all of us more broadly - the health of our world is inextricably linked to our health and continued existence.



Source: <https://www.dailymail.co.uk/sciencetech/article-5714369/Filmmaker-captures-heartbreaking-images-albatrosses-killed-plastic-remote-pacific-island.html>

Legacy to Future Generations. I do not think there is a greater good worth the continued destruction of people, places, and things. We should all be wiser and more courageous after studying our American and world histories. What amazes me most about history is our collective greed and carelessness with how we have treated the environment and each other. What usually amazes me in the present is our inability to learn from our past mistakes. I hope we are all able to have some humility on these matters and listen to the wisdom of others, including new members of Congress and the children of the present generation. The way it has always been done does not need to be the way it continues to be. For Alaska, ANWR and its coastal plain, and other places like it (Bristol Bay), I hope we have the courage and will to leave future generations a legacy better than what we inherited.

Thank you for your consideration.

Linda Serret
San Diego, California

cc:

Gwich'in Steering Committee
Trustees for Alaska

Rep. Sen. Nancy Pelosi
Sen. Kamala Harris
Sen. Feinstein

Sen. Hirono
Sen. Bernie Sanders

Rep. Sen. Alexandria Ocasio Cortez
Rep. Liew
Sen. Schumer

¹⁷ <https://www.npr.org/sections/thesalt/2018/08/20/636845604/beer-drinking-water-and-fish-tiny-plastic-is-everywhere>