



United States
Department of
Agriculture

Forest
Service

Southwestern
Region

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File Code: 1570-1 (FOR)

Date: December 8, 1997

Mr. Peter Galvin
Southwest Center for Biological Diversity
P.O. Box 710
Tucson, AZ 85702-0710

Certified Mail - Return
Receipt Requested

Dear Mr. Galvin:

I have completed a review of your appeal, dated October 14, 1997, of the Pocket-Baker Ecosystem Record of Decision (ROD). The review was conducted in accordance with 36 CFR 215.

BACKGROUND: On July 11, 1997, the Forest Supervisor made a decision to implement Alternative 6 for the Pocket-Baker Ecosystem. The project is located on the Long Valley Ranger District. The legal notice of the decision was published on August 27, 1997 in the Arizona Daily Sun. I received the appeal record from the Forest on October 27, 1997.

On November 3, 1997, I received correspondence from the Long Valley District Ranger that his attempts to meet with you were unsuccessful. Therefore, informal resolution of your appeal issues was not possible.

RECOMMENDATION OF APPEAL REVIEWING OFFICER (ARO): The Appeal Reviewing Officer has reviewed the appeal record and forwarded his recommendation to me. I have attached a copy of the ARO's recommendation. The ARO found that the Forest Supervisor's decision was supported by the appeal record and recommended that I affirm the decision.

APPEAL ISSUES: Appellant alleges that the project violates the National Forest Management Act, National Environmental Policy Act, and Wilderness Act. These issues are addressed as follows:

ISSUE 1: PROJECT FAILS TO MEET NATIONAL FOREST MANAGEMENT ACT REQUIREMENTS

ISSUE 1A: Project fails to follow Forest Plan old growth requirements

CONTENTION: "The Record of Decision (ROD) and (FEIS) do not allocate 20% of the analysis area to old growth management as required by the Coconino National Forest Plan and the Regional Amendments to Forest Plans in Region Three". (Appeal pt. 3)

RESPONSE: The FEIS (p. 35) states there are 517 acres of existing old growth and 1,772 acres to be managed as developing old growth. This allocation was established



prior to Amendment #11 of the Coconino Forest Plan. In the Wildlife Habitat Assessment (AR #173) 2,887 acres of developing and existing old growth is documented. An additional 2,230 acres of old growth is in clumps in stands not being managed for old growth

(AR #186) for a total of 5,117 acres of old growth allocated or 23% of the analysis area. This exceeds the Coconino Forest Plan Standards and Guidelines. The Forest Supervisor is affirmed on this point.

ISSUE 1B: Project fails to follow Forest Plan Northern goshawk standards and guidelines.

CONTENTION: "The project has not been surveyed to protocol specification for goshawks... in the past year, thus the surveys are out of date and resurveys must be conducted to accurately determine occupancy".

(Appeal pt. 2)

RESPONSE: Surveys conducted within the Pocket-Baker project area indicate that there are no known goshawks nesting within the project area, nor were any detected during the survey efforts. The BA&E (AR 176) states that the nearest "potential" Northern goshawk nest (040406), is located approximately one mile east of the Pocket-Baker 20K project boundary. This is well beyond the influence of the project boundary. For example, if a Post-fledging Family Area (PFA) were to be established in the future, the boundary of the project area to the boundary of the PFA would still be approximately 1/2 mile away, and therefore, would not be influenced by this project.

In 1991 and 1993 surveys were conducted for Northern goshawks in the Pocket 10K and no nests or Northern goshawks were detected (AR 176, p. 12; AR TE&S Survey Records). The Forest Plan Amendment states: "Complete at least 1 year of survey, but two years of survey should be done to verify questionable sightings, unconfirmed nest sites, etc." (ROD, p. 92). Northern goshawk surveys were also conducted in the Baker 10K in 1992, 1993, and 1994. These surveys failed to detect Northern goshawks or locate goshawk nest structures (AR #176, BA&E p. 12). Full coverage surveys were contracted and conducted following the Region 3 protocol providing full coverage of the analysis area. Therefore, in Pocket-Baker the surveys were conducted to Regional protocol.

CONTENTION: "The FEIS states 'Regional goshawk direction is applied to known territories.' This is wrong, incorrect and a violation of law."

(Appeal pt. 6)

RESPONSE: Surveys conducted within the Pocket-Baker project area indicate that there are no known goshawks nesting within the project area, nor were any detected during the survey efforts. Yet there are Mexican spotted owl PACs located along the boundary and two partial PACs within the project area. As a listed species, it makes more sense to manage towards meeting the habitat requirements for the Mexican spotted owl versus the Northern Goshawk. In addition, by managing for the MSO, you are meeting and or exceeding the intent of the Management Recommendations for the Northern Goshawk in the Southwestern United States. In the ROD, it states the following: "Within Mexican spotted owl protected and restricted areas, the Mexican spotted owl standards and guidelines take precedence over the Northern goshawk standards and guidelines." (ROD, p. 91).

CONTENTION: The ROD and EIS for this project fail to comply with the grazing utilization standards for goshawk habitat enunciated in the Regional Forest Plan amendments." (Appeal pt. 6, 25)

RESPONSE: There are no goshawk territories that are located within the Pocket-Baker project area. The purpose of the grazing utilization standards are to benefit of the goshawk prey base (small mammals). Range management in the Pocket-Baker project area emphasizes Mexican spotted owl prey base habitat. Refer to the Livestock Grazing section (FEIS p. 113). Also, refer to the Range Management section of the Biological Assessment and Evaluation (AR #176, p. 28-29).

"...the proposed grazing regime is expected to improve the current MSO prey species habitat conditions within "key grazing areas" (USDI 1995d) through increased rest from livestock grazing. Improved rodent habitat is expected to occur through improved forage and cover conditions."

In addition, the U. S. Fish and Wildlife Service (USFWS) concurrence letter (AR #178) acknowledges "improved livestock grazing over the entire 20K."

CONTENTION: "There is no assurance that two snags per acre will be on the site post action as required by the goshawk guidelines portion of the LMP." (Appeal pt. 15).

RESPONSE: The concurrence letter from USFWS recognizes snags and recruitments and acknowledges that they meet the intent of the MSO Recovery Plan. Therefore, if they meet the intent of the MSO Recovery Plan, they meet the ROD and the LMP (AR #178, p. 4; AR #175, p. 3).

CONTENTION: "The project area is already deficient in snags, yet the timber sale proposes to harvest some 5,000 trees over 16 inches." (Appeal pt. 4)

RESPONSE: In the FEIS, the Wildlife Habitat Assessment report and BA&E, snags and snag management, such as creating snags from live trees using a beetle pheromone are discussed in detail (AR #173, p. 1-11&1-12; AR #176 p. 4; AR #178, p.3 AR #179, p. 65). Therefore, snags will be protected, created and recruitments identified by treatment area, in order to mitigate for snag deficiencies.

ISSUE 1C: Project fails to follow Forest Plan MSO standards and guidelines

CONTENTION: "The project has not been surveyed to protocol specifications for spotted owls in the past year, thus the surveys are out of date and resurveys must be conducted to accurately determine occupancy. USFWS operative policy is that areas must be resurveyed for owls if more than one year has elapsed since the survey." (Appeal pt. 3)

RESPONSE: MSO Interim Directive 2 states "it is desirable to conduct at least a partial survey...when there is more than one year between the second survey and the start of the activity (p. 2676.2 - 8)." This is not a mandatory requirement. Sufficient surveys were completed for the MSO that comply with the Recovery Plan for the Mexican Spotted Owl. USFWS concurred with the Forest Service findings and did not require additional surveys (AR #178).

CONTENTION: "The FEIS and ROD state that no trees over 24 inches DBH will be cut by this project... The project violates the Recovery Plan for the Mexican Spotted Owl and thus also the Coconino National Forest Plan." (Appeal pt. 4)

RESPONSE: The FEIS infers the cutting of trees greater than 24 inches ("...clearing trees within 33 feet of the highway edge", page 14). The ROD clearly states "trees over 24 inches DBH will only be cut if identified as a hazard tree" (p. 4). Addendum 1 of the BA&E (AR #175) specifically addresses the removal of trees greater than 24 inches DBH from within the right-of-way (ROW) along State Highways 87 and 260 (as mentioned on page 22 of the BA&E). It is also stated in Addendum 1 of the BA&E that "Neither PAC #120421, nor that portion of PAC #040103 which lies within the 20K would be impacted by any of the proposed management activities" (AR #175). In their letter of concurrence, the USFWS states that "No trees 24 inches DBH or greater will be cut throughout the entire project unless they are considered safety hazards. Large ponderosa pine trees are only being cut along State Highway 87 for public safety reasons" (AR #178, p. 4). The project does not violate the Recovery Plan the MSO, therefore it is in compliance with the Coconino National Forest Plan and ROD for Amendment of Forest Plans.

CONTENTION: "The level of cutting in the over 1,000 acres of units where the BA will be reduced to under 40% creates a may effect, likely adverse situation for the Mexican Spotted Owl." (Appeal pt. 16)

RESPONSE: The USFWS legally concurred with the Forest Service finding of "may effect, not likely to adversely affect." (AR #178)

CONTENTION: "The Coconino NF states that projects do not necessarily need to comply with Recovery Plans..." (Appeal pt. 4B)

RESPONSE: The Recovery Plan for the Mexican spotted owl was followed. In the USFWS letter of concurrence it is stated that "This project is consistent with recommendations discussed in the owl Recovery Plan" (AR #178).

ISSUE 1D: The project violates the Coconino National Forest Plan

CONTENTION: "Forest Plan 10 year allowable sale schedule does (not) list the Pocket-Baker in the schedule." (Appeal pt. 5)

RESPONSE: Prior to the implementation of the Regionwide Forest Plan amendment of June 5, 1996, plans contained informational tables that estimated quantity and timing of site specific activities. The tables were the best estimate of possible activities when the plans were approved. However, since plans were approved, it had been established through appeals and litigation that the plan is a programmatic document. Site-specific activities listed in these tables were not covered in the programmatic environmental analysis and do not constitute one of the key decisions made in the forest plans. Actual forest plan implementation has been different than portrayed in the informational tables. Modifications to the tables are handled as corrections (FSH 1909.15, 10-18) rather than amendments. Direction had been given to the field units to publish a schedule of

proposed actions four times a year to provide the public with the needed information on project scheduling (Forest Service Handbook 1909.15). Amendment Number 6 to the Coconino Forest Plan explains adjustments to the offering schedule (FEIS p. 162). The Forest Supervisor is affirmed on this point.

CONTENTION: "The post action road density will exceed LMP S&G standard." (Appeal pt. 14)

RESPONSE: The FEIS (p. 44) states that after all closure and obliteration decisions are completed, "The resulting road density is about 2 miles per square mile." The Coconino Forest Plan (Plan) contains road density guidance in two places. First, in the forest wide standards and guidelines (S&Gs), Plan page 89, it states, manage road densities to achieve an average of 1 mile per section in the woodland zone, and an average of 2 miles per section in the ponderosa/mixed conifer zone. Also, in the goshawk S&Gs, Plan page 65-11, the following guidance is found, "Manage road densities at the lowest level possible."

Consequences resulting from implementation of alternative 6 regarding road densities can be found on FEIS page 131. The following statement of estimated consequence can be found there, "Alternatives 1, 2, 3, and 6 will provide for the improvement of stream courses by removal/ closure /obliteration of nearly 40 miles of road segments within the stream courses or their filter strips. This represents 18 miles of roads to be treated in addition to the approximately 32 miles of existing decisions. Road densities after implementation of all RATM decisions will be just under 2 miles per square mile." Clearly the management direction is toward average road densities consistent with the S&Gs found in the Plan. This complies with the Coconino Forest Plan. The Forest Supervisor is affirmed on this point.

ISSUE 1E: The project does not cover effects to Management Indicator Species or Sensitive Species

CONTENTION: "The BE for the project does not cover effects to all MIS and TES species which could be present in the area..." (Appeal pt. 7)

RESPONSE: The Wildlife Habitat Assessment (AR #173) states "the assessment is based on...habitat conditions to a select group of indicator species...identified in the Coconino National Forest Land and Resources Management Plan (p. 1-1). The BA&E covers all possible TE&S species and reasons for exclusion of others (AR #176, p. 44-45). Management Indicator Species are covered at the Land Management Plan level and are beyond the scope of this project.

CONTENTION: "No surveys have been conducted for sensitive species including the flammulated owl and numerous other species". (Appeal pt. 8)

RESPONSE: Specific inventories were not done for the flammulated owl, though many owls responded during the MSO inventories. There is no management plan for the flammulated owl, though Recovery Plans do exist for other sensitive species. It is beyond the scope of the FEIS to include a Recovery Plan for the flammulated owl. Habitats for

sensitive species and all other wildlife are considered on a landscape level. Discussion of habitats required for Coconino wildlife species is found in the FEIS. The range of vegetative stand conditions across the landscape along the lines espoused by the Goshawk guidelines was adopted for the Pocket-Baker area. In this manner, all habitats are considered. The consequences of harvesting and burning on the vegetative component was displayed for each alternative. In addition, snags are being retained, dead and down is being retained and monitored, and herbaceous vegetation is being improved and monitored (FEIS pages 60-66, 99-101, 106-128, 138-140). When sensitive species are encountered during the implementation phase, additional measures are taken

CONTENTION: "HCI indexes are not given for various wildlife species in before-after projections, ... but fails to assess, discuss or analyze the decline in habitat conditions for Abert's squirrels and other wildlife". (Appeal pt. 21)

RESPONSE: Refer to PR #173 Wildlife Habitat Assessment and Evaluation of Alternatives for Pocket-Baker 20K Ecosystem Area. Although HCI indexes are not given for Abert's squirrel and other various wildlife species, current wildlife habitat components and conditions for the Pocket-Baker 10K analysis areas were assessed and evaluation of management alternatives were addressed for specific Management Indicator Species identified in the Coconino National Forest LRMP. HCI Indexes are not mandated.

ISSUE 1F: The project fails to analyze the positive effects of mistletoe

CONTENTION: "The FS fails to acknowledge in detail and analyze the positive benefits of mistletoe to the ecosystem and wildlife in particular". (Appeal pt. 194)

RESPONSE: On pages 91 through 93 of the FEIS is a discussion of dwarf mistletoe and wildlife relationships and benefits, including the uses of dwarf mistletoe for food, and mistletoe brooms for nesting sites. The Forest Supervisor is affirmed on this point.

ISSUE 2: PROJECT VIOLATES NATIONAL ENVIRONMENTAL POLICY ACT

ISSUE 2A: Scoping process flawed

CONTENTION: "the scoping process was violated in this process. The DEIS was released before the closure of the formal Notice of Intent to Comment period". (Appeal pt. 2)

RESPONSE: Although the Council on Environmental Quality Regulations require scoping only for EIS preparation, the Forest Service has broadened the concept to apply to all proposed actions. Scoping is an integral part of environmental analysis. Scoping for this analysis area started as early as January 1989 see AR #6. Participation of affected parties is documented as early as January 1990 in AR #9. Clearly the public was invited to participate in scoping with the notice found in AR #19, dated October 1991.

Further, a proposed action for the Pocket 10K Management Area was mailed to interested parties in June 1992, with an invitation to comment, see AR #31.

of the Pocket-Baker 20K analysis (AR #115). In the letter, it was stated that an EIS would be prepared, and that initiation of the EIS process would begin in October of 1994. Comments were requested on initial issues stated in the letter. Peter Galvin was mailed a copy of this letter. On

October 4, 1994 a Notice of Intent to Prepare and Environmental Impact Statement (AR #119) was prepared and mailed to the Office of the Federal Register to be published. Comments were requested by November 15, 1994. On May 16, 1995 (AR #147) a second Notice of Intent was mailed to the Office of the Federal Register because the initial Notice was never received by their office. In this Notice, it states "... comments on the issues and suggestions for additional issues are welcome in response to the draft environmental impact statement which will follow this Notice of Intent, shortly... The draft environmental impact statement can be expected in June 1995. A forty-five day comment period pursuant to 36 CFR 219.10(b) will be provided for the public to make comments on the draft environmental impact statement." The Notice of Availability of the Pocket-Baker DEIS was published in the Federal Register on June 2, 1995. Comments on the DEIS were due by July 17, 1995.

The DEIS was mailed out to the public, including SWCBD, on May 30, 1995, and comments were requested by July 15, 1995. No comments had been received by the District Ranger from Peter Galvin or SWCBD prior to this time. No comments were received stating that the timing of the Notice of Intent or the draft review period was a problem. (FEIS p. 196). The District Ranger did accept comments well after July 15, 1995, as noted in the Response to Comments Section (p. 159 - 199) of the FEIS. SWCBD comments dated June 13, 1995 and the responses are included. (FEIS p. 160). While there were problems with the Notice of Intent and timing of the release of the DEIS, no concerns were raised that there was not an adequate comment period.

Thus, consistent with FSH 1909.15 there was an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action. The Forest Supervisor is affirmed on this point.

ISSUE 2B: The Purpose and Need is flawed

CONTENTION: "The FEIS does not adequately explain the purpose and need for the project". (Appeal pt. 9)

RESPONSE: According to 40 CFR 1502.13 the purpose and need statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action. The purposes and needs to which the agency is responding in the Pocket-Baker Planning Area are documented in FEIS Chapter 1 (AR #179). It is clearly stated the purpose of the preferred alternative is to change current management direction as necessary to address the identified issues. Six issues are described including desired conditions and resource objectives.

These statements of desired conditions and resource objectives adequately describe the purpose and need. The Supervisor is affirmed on this point.

CONTENTION: "The stated purpose and need for the project has changed considerably since the DEIS was first issued requiring additional scoping or an SDEIS [sic] before the project can proceed." (Appeal pt. 9)

RESPONSE: Only one of the issue statements found in the DEIS (AR #152) is changed in the FEIS. The desired conditions and resource objectives for the changed issue are essentially the same in both the DEIS and the FEIS. The Supervisor is affirmed on this point.

ISSUE 2C: Project does not adequately respond to issues

CONTENTION: "The FEIS does not adequately respond to issues brought up in the EIS process. The specific critique offered by Arizona Game and Fish Department (was) ignored by the FS in their response". (Appeal pt. 10)

RESPONSE: A response was made to the to the Arizona Game and Fish comment you cite. It is documented in the FEIS at page 189. The adequacy of the response is a judgement which only the experts can make. If there is still a concern on this point we will rely on the Game and Fish Department to express it. The Forest Supervisor is affirmed on this point.

CONTENTION: "The ROD and FEIS do not accurately state the economic issues associated with the project." (Appeal pt. 13)

RESPONSE: An economic analysis is provided (AR #146) that discusses costs and benefits by action alternative which is then summarized on page 137 of the FEIS. The Forest Supervisor meets the requirement of an economic analysis and is affirmed on this point.

CONTENTION: "The FS ignores or fails to adequately answer and respond to numerous questions, concerns and comments brought up through the process." (Appeal pt. 26)

RESPONSE: Because the appellant does not make clear what these questions, concerns, and comments are, I have elected not to respond to this comment.

CONTENTION: "NEPA, CEQ and FS regs. state that all EIS's must contain a section discussing Unavoidable Adverse Effects and another discussing the Irreversible and Irretrievable Commitments of Resources associated with the project." (Appeal pt. 18)

RESPONSE: NEPA Section 102(2)(C)(ii) and (v) and CEQ regulation at 40 CFR §1502.16 require the effects section of an EIS contain discussions of "...any adverse environmental effects which cannot be avoided..." and "...any irreversible or irretrievable commitments of resources..." Forest Service Handbook 1909.15 Sec.22.3(g) provides the same direction by referencing Section 102(2)(C)(i), (ii), (iv), and (v) of NEPA. There is no direction in the Act, CEQ regulation, nor Forest Service direction requiring this disclosure be made in its own, identified section.

The Forest Supervisor discussed resource commitments in the EIS, in his description of the proposed action and alternatives. Further detail is added in the environmental consequences discussions in the EIS. Environmental effects, both beneficial and adverse are discussed in EIS Chapter 8, under Consequences and Conclusions. The Forest Supervisor is affirmed on these issues.

ISSUE 2D: The project does not have an adequate range of alternatives

CONTENTION: "The EIS does not contain an adequate range of alternatives as mandated by NEPA." (Appeal pt. 11)

RESPONSE: We must look at every reasonable alternative, within the range dictated by the nature and scope of the proposed action, and sufficient to permit a reasonable choice, (Idaho Conservation League v. Mumma, 956 F.2d 1508, 1520 (9th Cir.1992)). The proposed actions are changes in management within the Pocket-Baker Ecosystem including prescribed burning, timber harvesting, changing livestock grazing management, improving highway safety, soils, watershed, and aspen grove conditions in responds to the issues identified in the scoping process. These management actions are proposed to move the ecosystem closer to the desired conditions also identified in the scoping process. The scoping process and the resulting desired conditions provides focus for defining the scope of analysis and a reasonable range of alternatives. Reasonable alternatives address one or more of the issues raised in the analysis and address the desired conditions and management objectives.

Six alternatives were considered in the initial analysis, one of which was dropped from detailed consideration. A sixth alternative was added due to comments on the DEIS. All alternatives considered were based on the issues and the desired conditions. The Supervisor adequately examined a reasonable range of alternatives determined by the nature and scope of the proposed action and is therefore affirmed on this point.

ISSUE 2E: The project cumulative effects analysis is inadequate

CONTENTION: "The EPA wrote in (12-14) that the effects of actions on the adjacent Tonto National Forest need to be addressed." Appellant feels that the cumulative effects analysis is inadequate and must be supplemented to the information requested by the EPA. (Appeal pt. 12)

RESPONSE: The Forest Supervisor is responsible for delineating the scope of this analysis. He delineated the southern and western boundaries of the analysis area to coincide with the Mogollon Rim. The common boundary between the Tonto and Coconino National Forests also follows the Mogollon Rim through the project area. The record describes this boundary as an ecotone of Arizona chaparral woodland (AR #71). Project record maps indicate a minimum 1,000 ft. elevation change from the top to the bottom of the escarpment. With dissimilar vegetation and elevations, the Mogollon Rim provides a natural geographical boundary in setting the scope of the cumulative effects analysis. The Forest Supervisor is affirmed with respect to the effects of actions on the adjacent Tonto National Forest.

CONTENTION: "One of the grazing allotments is partly on the Tonto National Forest yet there is no analysis of the resource conditions and associated effects and impacts and cumulative effects of this action...."

(Appeal pt. 23)

RESPONSE: One of the objectives of the scoping process is to define the analysis scope and the significant issues to be analyzed in depth. Scoping for the Pocket-Baker Ecosystem analysis defined the analysis area and documented that area in the Notice of Intent (AR #119), and the DEIS (AR #152). The analysis area as defined excluded the the portion of the Tonto cited in the appeal. However, we must be reasonable in defining the analysis scope and base it on the nature of the issues and potential effects to the environment. The Supervisor was reasonable and is affirmed on this point.

ISSUE 3: PROJECT VIOLATES THE WILDERNESS ACT

CONTENTION: "The FEIS and ROD propose to authorize livestock grazing and motorized incursion in a Wilderness area in violation of the Wilderness Act." (Appeal pt. 24)

RESPONSE: The only livestock grazing and motorized incursion (to maintain a stock tank) in the Wilderness area are those uses that were established prior to the designation of the Wilderness area. CFR 293.7 (a) states "The grazing of livestock, where such use was established before the date of legislation which includes an area in the National Wilderness Preservation System, shall be permitted to continue under the general regulations covering grazing of livestock on the National Forests and in accordance with special provisions covering grazing use in units of National Forest Wilderness.... (b) The Chief, Forest Service may permit, subject to such conditions as he deems necessary, the maintenance, reconstruction, or relocation of those livestock structures which existed within a Wilderness when it was incorporated into the National Wilderness Preservation System."

APPEAL DECISION: The Appeal Reviewing Officer has recommended the Forest Supervisor's decision concerning the Pocket-Baker Ecosystem Area be affirmed. After reviewing the appeal record, I find that the Forest Supervisor has complied with the National Forest Management Act and the National Environmental Policy Act.---WHAT ABOUT THE WILDERNESS ACT? I affirm the Forest Supervisor's decision to implement Alternative 6 for the Pocket-Baker Ecosystem Area. Appellant's request for relief is denied.

This decision constitutes the final administrative determination of the Department of Agriculture (36 CFR 215.18(c)).

Sincerely,

/s/ Gilbert Vigil

GILBERT VIGIL
Appeals Deciding Officer
Acting Deputy Regional Forester, Resources

Enclosure

cc:
Coconino NF
P.Jackson
C.Gonzalez
EAP
FOR
WL