

X. PROTECTION OF SENSITIVE RESOURCES

A. Archeological/Cultural/Historic Resources and Actions to Prevent or Mitigate Negative Impacts

Humans have used the area of the southern Rocky Mountains known today as Rocky Mountain National Park, for approximately 10,000 years. Material remains of prehistoric and historic human uses are located at all elevations, and in all parts of the park. For management purposes, the park divides cultural resources into prehistoric sites, historic sites, Traditional Cultural Properties, and isolated finds.

Rocky Mountain National Park (RMNP) works directly with the Colorado State Historic Preservation Office to guide compliance with Section 106 of the National Historic Preservation Act (NHPA) for fire and fuel treatment activities. All cultural resources that are listed on, determined eligible for, or are unevaluated for inclusion on the National Register of Historic Places will be protected during ground disturbing activities. If these activities are associated with wildland fire suppression have the potential to affect cultural resources, the park archaeologist will be contacted. If the ground disturbing activities are associated with planned projects such as manual fuel reduction or site preparation for prescribed burns, the park archaeologist will be notified through the established project proposal process.

Chapter III of the Fire Management Plan identifies the specific known cultural resources in each Fire Management Unit (FMU) as known in the fall of 2003. The following review of cultural resources in the park discusses effects of fire on the resources and possible mitigation measures.

Prehistoric Archaeological Sites. Prehistoric and protohistoric cultural material found in the park includes flaked lithics, ceramics, hearths, rock walls/game drives/kill sites, butchering stations, camp sites and midden deposits, tipi rings, wickiups, culturally peeled trees, rock cairns, and battle sites (Butler 1997 *Rocky Mountain National Park Research Design for Archeology*). Although it is generally believed that most prehistoric, and some protohistoric cultural material has been subjected to the effects of wildland fire in the past, certain cultural resources may be adversely affected by fire. These resources include fire hearths with datable (C14) charcoal, buried midden deposits with organic material, wood wickiups, and culturally peeled trees.

Mitigation measures to protect these cultural resources include removing fuel from interior and site perimeters, and effectively removing these resources from proposed project areas by constructing hand line, wet line, or installing physical barriers such as fire shelters. These cultural resources should not be exposed to prescribed or wildland fire.

Historic Archaeological Sites. The historic era in RMNP ranges from the later half of the 19th Century through the middle of the 20th Century. Historic-era cultural material found in the park is generally associated with mining, ranching, and tourism. American Indian sites from the historic-era are also present in the park. Historic-era cultural material found in the park includes wood and rock structural remains (both Euro-American and American Indian), travel ways including roads and trails, artifact scatters including metal, glass, brick, and ceramics, hearths and temporary camps, cabin platforms, blazed trees, fence materials, telephone lines, burials and memorials, and landscaped vegetation and rock work. Artifact types that may be adversely affected by fire include wood structural remains, features, and artifacts, hearths that may contain datable charcoal, blazed trees and fence material, burials, and landscaped or planted vegetation.

Mitigation measures to protect these cultural resources include removing fuel from interior and site perimeters, and effectively removing these resources from proposed project areas by constructing hand line, wet line, or installing physical barriers such as fire shelters. These cultural resources should not be exposed to prescribed or wildland fire.

Traditional Cultural Properties. Traditional Cultural Properties (TCPs) are specific physical locations that have a history of use by an identified cultural group. In RMNP, TCPs are associated with American Indian tribes. TCPs are generally located to include an important viewshed or

natural resources that are essential to a cultural or religious ceremony. TCPs are considered sensitive sites, and may be adversely affected by fire.

Mitigation measures to protect these cultural resources include effectively removing these resources from proposed project areas by constructing hand line, wet line, or installing physical barriers such as fire shelters. These cultural resources should not be exposed to prescribed or wildland fire, except where requested by the users of the TCP to benefit resources (for example, burning to stimulate new growth of a specific plant species).

Isolated finds. Isolated finds are defined as less than ten artifacts in a 100 square meter area suggesting a single function. Included are such items as certain hearths, cairns, and modern wickiups – all common finds in RMNP. By definition, Isolated finds are not eligible for inclusion to the National Register of Historic Places. The park archaeologist may suggest that the park manage certain isolated finds for protection. Mitigation measures may include any of those suggested for historic or prehistoric cultural resources, above.

B. Wilderness

NPS wilderness management policies are based on provisions of the Organic Act and the Wilderness Act, as well as the enabling legislation of individual parks within the National Park system. As outlined in Director's Order #41 (DO-41), wilderness management programs and policies apply to parks that have suitable, study, proposed, recommended, and designated wilderness, since NPS Management Policies 2001 (6.3.1) treat all categories of wilderness in the same manner:

... "the term "wilderness" will include the categories suitable, study, proposed, recommended, and designated wilderness. Potential wilderness may be a subset of any of these five categories. The policies apply regardless of category."

Therefore, the Park Service will take no action that would diminish the wilderness suitability of an area recommended for wilderness study or for wilderness designation until the legislative process has been completed. Until that process has been completed, management decisions pertaining to recommended wilderness and wilderness study areas will be made in expectation of wilderness designation. Currently, within the park, approximately 248,464 acres (93.5 percent) is recommended wilderness, 1,147 acres (0.4 percent) is potential wilderness, and 2,917 acres (1.1 percent) is designated wilderness [USDI National Park Service, 2001 #1193].

Fire management activities conducted in wilderness will conform to the basic purposes of wilderness. The park recognizes the need to integrate responsible fire, ecosystem, and wilderness management practices with the protection of community and public safety. This plan identifies the natural and historical role of fire in the wilderness and defines the appropriate management response to all wildland fires, including the full range of management alternatives from aggressive suppression to managing a wildland fire for resource benefits.

Actions taken to perform hazard fuel reduction projects, conduct prescribed fires, and manage wildland fires will follow the Minimum Requirement Concept. The minimum requirement process provides a method for developing, evaluating, and selecting the actions that provide the least intrusion on wilderness character and values. Fire management actions will be conducted in such a way as to protect natural and cultural resources and wilderness values. Application of the minimum requirement process and minimum/primitive tool procedures will be conducted as specified in the Wilderness Act (1964), NPS Management Policies (2001), NPS DO #41 (1999) and the park's Backcountry/Wilderness Management Plan (2001).

Aircraft, motorized equipment (i.e., chainsaws, portable pumps, weed whackers, generators) and installations (i.e., portable weather stations, smoke monitoring devices, fire effects monitoring plots, communications equipment) may be allowed during hazard fuel reduction projects, prescribed fire operations, and wildland fire actions if determined to meet the minimum requirement.

A Minimum Requirement Analysis Worksheet (ROMO-180) will be completed for hazard fuel reduction projects and prescribed fire operations and will be included as part of the Project Proposal Form (ROMO-178) and/or Prescribed Fire Burn Plan. In the case of wildland fires, a Minimum Requirement Analysis Worksheet will be either included in the Wildland Fire Implementation Plan (WFIP) or as a component of the transition package a Wildland Fire Situation Analysis (WFSA).

All wildland fires within wilderness, whether suppression actions or wildland fire use actions, will be effectively managed considering wilderness and other resource values, while providing for public and fire personnel safety using the full range of strategic and tactical options allowed by departmental and agency policies. Wildland fire management response will include the application of minimum impact techniques and, if it is a suppression action, utilize minimum requirement suppression techniques.

All impacts of fire activities in wilderness, whether wildland or prescribed, will be rehabilitated, at a minimum, as follows: stumps flush cut, firelines filled and camouflaged, water bars installed as necessary, temporary campsites cleaned and restored to natural conditions, and other effects of fire management activities will be restored to natural conditions. The Interagency Burned Area Emergency Stabilization and Rehabilitation Handbook will be the primary source of guidance on emergency stabilization, rehabilitation, and restoration policies and procedures, and will be implemented as prescribed in Director's Order #18 (DO-18) and Reference Manual #18 (RM-18).

For wildland fires that exceed initial attack or that are being managed for resource benefits, a Delegation of Authority document will outline specific requirements to be adhered to, in the case that the management of these fires within wilderness is turned over to an Incident Management Team.

C. Aesthetics and Scenery

Fire management activities, including the exclusion of fire from fire-adapted ecosystems, can greatly affect the visual quality of any landscape. For example, prescribed fire and wildland fire can leave significant visible evidence on the landscape for some time, but successful fire exclusion in many ecosystems creates landscapes with low visual diversity. If the park's fire management activities are carried out with an understanding of the natural role and historical effects of fire on the landscape, these management activities can be visually pleasing or perhaps even visually enhancing.

In some situations however, fire can produce temporary negative visual impacts, particularly on vegetation and on the forest floor. Such effects often include tree-crown scorch, blackened tree trunks, burned or killed understory vegetation, and a blackened forest floor. Past forest fire education and prevention programs have given the public a generally poor impression of wildland fire and fire effects. This is a significant contributing factor to a poor understanding of ecological principles associated with fire-adapted ecosystems. In addition, some members of the public consider the effects of fire as unattractive and aesthetically unappealing.

Using wildland fire and/or prescribed fire as a management tool requires a focus on public education, and in some instance, requires a change in public attitude. One area of focus of this education program is that visual effects associated with prescribed burning are only temporary. These immediate visual fire effects may last from only a few weeks to many years, depending on the intensity of the burn.

D. Endangered, Threatened, and Rare Species

Some plants and animals receive protection under the Endangered Species Act of 1973. The U. S. Fish and Wildlife Service maintains the Federal list of endangered and threatened plants and animals. The service also maintains a list of plants and animals that are candidates for possible addition to the Federal list. Within RMNP there are plants and animals that are on the Federal list, or are candidates for listing. Appendix F identifies the endangered, threatened, and candidate

species for RMNP. The Division of Natural Resource Management of the park also maintains a list of rare and sensitive species. The list of rare and sensitive species is maintained and updated periodically by the park Natural Resource Management Specialist. NPS policies state that candidate species will be protected as if they were listed, to the greatest extent possible.

Although no federally listed plants are thought to occur in the park, 54 plant species are currently considered to be of special interest because of their rarity in the state of Colorado (as determined by the Colorado Natural Heritage program). Little is known about the biology or distribution of these plants. These plants' rarity may be due to a variety of circumstances, such as habitat specificity, limited dispersal, impacts of pathogens and invasive species, or habitat alteration. The scarcity of some may in fact be due to the absence of fire. Many plants have evolved with, and depend on, fire for their continued existence. Many current rare plant species are known to be associated with disturbances and the lack of these activities may cause declines in the plant numbers.

All fuels treatment activities are planned events and normal park protocols necessitate project review by Resource Management Specialists. On-the-ground inventories of treatment units will take place as necessary. If inventories are required, treatment will not proceed until the inventory and any suitable mitigation is completed. If a treatment unit has the potential to provide habitat for special-status species, steps will be taken to work around sensitive periods of time for animals and plants. Altering the time of treatment, providing direct protection to sensitive areas, or simply not treating certain parts of the unit will accomplish any special resource protection that may be necessary.

E. Air Quality

Clean air and visibility are important natural resource values of RMNP. The park has been designated as a Class I area by the 1977 amendments to the Clean Air Act (Public Law 95-217), which requires the prevention of significant deterioration in air quality and gives added protection to areas of unique scenic value. As a result of the importance of the air quality resource at RMNP, smoke management is a serious issue. As government agencies seek to identify pollution sources outside of park boundaries, the NPS, along with neighboring land management agencies must carefully manage smoke from wildland and prescribed fires to protect resource values. A basic premise associated with management of fire-adapted ecosystems and lightning-caused fire is the potential emission and energy release from the fuel/vegetation complex. These emissions could have minimal impact, as with a skillfully controlled prescribed fire, or they could have a significant impact, as could be the case with an uncontrolled wildland fire.

DO #41 provides the following direction: "Managers will be responsible for reducing the impacts of smoke from wildland fires on visibility in Class I wilderness, while understanding and promoting the need to re-introduce the natural role of fire into wilderness ecosystems." NPS fire management activities which result in the discharge of air pollutants (e.g., smoke, carbon monoxide, and other pollutants from fires) are subject to, and must comply with, all applicable Federal, state, interstate, and local air pollution control requirements, as specified by Section 118 of the Clean Air Act, as amended (42 USC 7418). These requirements are the same substantive, procedural, and administrative requirements that apply to a private person or other non-governmental entity.

It was not a primary intent of the Clean Air Act to manage the impacts of natural sources of impairment. Fire plays a principal, and in some cases a dominant role in maintaining the integrity of NPS unit resources. The inevitable smoke must be accepted as a by-product of management that serves to protect the functioning of fire in these ecosystems. Since fires are not point sources, but rather tend to be spatially distributed singular events, temporary impacts to visibility and visitor enjoyment must be recognized, expected, and managed. This may include temporary closures or warnings as acceptable during the progress of beneficial, ecologically essential fires. Interpretive programs should include clear and reasonable explanations for such necessary practices. All NPS units, including those with exclusive jurisdiction, are required to obtain necessary permits for prescribed fires, comply with the National Ambient Air Quality Standards (NAAQS) both inside and outside unit boundaries, and protect visibility in Congressionally-mandated Class I unit areas.

F. Riparian Areas and Wetlands

Riparian zones and wetlands form the interface between terrestrial and aquatic environments. As a result, wetlands and riparian areas are subject to the influences of both systems. These areas are quite dynamic, owing to high rates of disturbance such as the erosion and deposition process associated with streams, fire associated with upland vegetation, and wind, which may be accelerated in narrow valley bottoms. All fire management activities in these areas will utilize Minimum Impact Techniques to minimize unwanted effects.

Fire suppression activities may use riparian areas and wetlands as firebreaks, as these areas rarely burn, except under the driest conditions. However, fire control strategies must be sensitive to wetland values, and firelines should not tie directly into wetland or bog margins except when relying on those areas to naturally retard the fire without constructed line. Fire retardants or foams should not be used in the vicinity of wetlands or other bodies of water.

Wetland values should be enhanced by the use of prescribed and/or prescribed natural fire. The low fireline intensities should not increase runoff or erosion hazard. Fire should have a positive effect, if any, on the hydrologic complex feeding wetlands, by reducing evapo-transpirational demands by killing some vegetation, and increasing annual water flow through the wetland.

G. Park Developments, Infrastructure, In-holdings, and Other Improvements

A large percentage of the acreage within the park sustains natural conditions without any physical improvements. Physical improvements, where necessary to meet visitor and employee needs, include roads, trails, parking areas, campgrounds, picnic areas, visitor centers, administrative offices, employee housing, utilities, etc. Existing facilities are concentrated in specific areas of the park including:

- Park Headquarters, Park Housing, and Utility Area
- Beaver Meadows Entrance Station
- Fall River Entrance Station and Bighorn Ranger Station
- Longs Peak Trailhead and Campground
- Wild Basin Entrance and Ranger Station
- Glacier Basin Campground, Sprague Lake Area, and Bear Lake Road Shuttle
- Aspen Glen Campground
- Moraine Park Campground and associated development
- Timber Creek Campground
- Green Mountain Housing
- Bear Lake Parking Area
- Alpine Visitor Center
- Kawuneeche Visitor Center, Maintenance Area, NPS Housing, and Entrance Station
- McGraw Ranch
- MacGregor Ranch (a conservation easement)

In addition, there are many other isolated physical improvements that are scattered throughout the park, ranging from utility lines to small storage sheds to backcountry cabins. Various in-holdings exist in the park, but are primarily concentrated in the eastern Fire Management Units. These improvements are identified in the Chapter III of this plan and all warrant protection in the management of wildland fire and associated activities.

H. Actions to Prevent or Mitigate Negative Impacts to Natural Resources and Physical Improvements

Site-specific plans will be prepared for all prescribed fire and non-fire treatments and will include all of the required elements listed in the RM #18, including the protection of sensitive features. A WFSAs will be prepared for suppression fires that are not contained or controlled by initial attack forces, wildland fires being managed for resource benefits that exceed prescription parameters, or

prescribed fires that exceed prescription parameters. The WFSA is a decision making process that evaluates alternative management strategies against selected safety, environmental (including air quality), wilderness, social, economic, political, and resource management objectives. The Resource Management Specialist (and/or other staff as appropriate) will assist in consultation concerning impacts on endangered, threatened, or rare species, air quality issues, and other resource concerns and will assist in the development of the WFSA.

Except for unplanned wildland fires, all fire management activities must comply with NEPA. The 1992 FMP provides NEPA compliance for numerous prescribed fire and hazardous fuels reduction projects, as does the 2002 Wildland Urban Interface Fuels Management Environmental Assessment. Future fire management projects not covered by these two NEPA documents will require further NEPA compliance, in accordance with departmental and agency policies.

With wildland fires, which are unplanned events, resource advisors will be notified of the intent to manage a fire in a certain part of the park. The location of the ignition will be reported and efforts will be made to get specialists into the area to perform basic inventory work as part of the cost of the incident. If features are located that require some mitigation, action points (geographic locations at which, if the fire reaches them, an action to mitigate is triggered) would be established and mitigation plans would be developed. Once the fire reached the action point the mitigation plan would be implemented. It could take several days to weeks before these actions were needed and the fire may not ever reach the identified resource at risk.

Fire management activities within the park will be carried out in a way that minimizes impacts to the Park's natural and cultural resources. Fire camp facilities, when practical, will be located outside of natural and historic zones. Suppression forces will choose methods and equipment commensurate with suppression needs and a strategy that will least alter the landscape or disturb park resources. Of primary importance is the need to impress upon suppression forces the minimum impact suppression guidelines found in the NPS DO #18 and RM #18. These guidelines take the park ethic into account in fire management practices; they are not an excuse to relax normal safe fire practices. Techniques and policies of minimum impact fire management that will be used in the park, as conditions dictate, include, but are not limited to:

- Cold-trail the fire edge when practical.
- Use wetline or natural firebreaks wherever possible (in lieu of handline construction) if water and pumps are available. Waterbars will be installed on handline on steep slopes. To the maximum extend possible, wetline only in the tundra ecosystem.
- Use soaker hose or foggers in mop-up to avoid "boring" and hydraulic action on soils.
- The fireline should be kept to the minimum width needed to allow backfiring, burnout, or the creation of a safe blackline. Use natural barriers wherever possible to avoid "tunnel effect."
- Do minimal tree felling. Snags within or adjacent to fireline will be removed only if they show evidence of fire, present excessive hazard to firefighters, or constitute a legitimate threat to the fireline integrity. Leave living trees undisturbed whenever possible. The lower branches should be pruned to remove ladder fuels.
- Take archaeological protection measures to protect cultural resources (an archaeologist or qualified individual from the park will be assigned as a resource advisor).
- Debris should be scattered or removed as determined by the Resource Advisor.
- All constructed fireline, spike camps, or other disturbance in visually sensitive areas will be rehabilitated to maintain a natural appearance.
- After the fire emergency is over, transport of personnel, equipment, and trash out of the park will be consistent with park resource management objectives.
- Engines will be used only on established roads within park boundaries, unless an imminent threat exists to human life or critical resources.
- Use of fireline explosives. Trees severed with explosive cord do not leave cut planar surfaces as do trees cut with chainsaws. This reduces the need for rehabilitation, and the shattered boles

and stumps may look more natural in less time than trees cut with chainsaws. The use of explosives on either prescribed or wildland fire requires approval from the Superintendent.

Specifically, the following mitigation measures will be adhered to on all fuels management projects within the area covered under the Wildland-Urban Interface Fuels Management Environmental Assessment (2002):

- Smoke management reporting procedures for burning in Colorado will be followed for all prescribed fire operations.
- Employ the “Minimum Impact Suppression Tactics” when possible.
- Park vehicles in specified areas and have crews walk to the project sites to avoid resource damage.
- No off road vehicle use unless approved by the Superintendent.
- No heavy equipment use unless approved by the Superintendent.
- The Superintendent must approve chainsaw and pump use.
- Mechanized equipment will be in good operating condition so that exhaust emissions are kept to a minimum.
- Transportation of crews and equipment will take place on paved roads, when appropriate.
- Slash pile and prescribed burns will be scheduled for periods when inversions will be unlikely to trap air.
- Burns will take place when visitation levels are low and prevailing winds would carry smoke away from structures.
- Burn piles will be free from dirt, as dry as possible, and small enough so smoke impacts can be managed.
- Ignition will be during periods of ideal ventilation and atmospheric instability resulting in optimal smoke dispersal.
- Meteorological conditions will be reevaluated on the day of the burn to ensure that conditions are favorable for smoke dispersion and air quality standards will not be threatened. If unfavorable conditions were indicated, the burn would be postponed.
- Use refueling stations with ground protection for refueling chainsaws to minimize chances of gasoline spills.
- Potential erosion and sediment delivery to streams will be limited by ensuring that only portions of a watershed are burned in any given year.
- No activities will be conducted within wetland areas.
- Slash will not be moved from upland sites into a wetland.
- Slash will be kept out of open water.
- Whenever practical, equipment maintenance and fueling will not take place in wetlands.
- Limbing and trimming activities could potentially affect tree-nesting birds and care will be taken to avoid nests.
- Both the thinning and prescribed fire treatments will be implemented outside the breeding seasons of most species.
- All stumps will be flush cut, firelines filled and camouflaged.
- Following treatment, treated areas will be monitored for invasive exotic plants. Monitoring will be done every year for three years and then every other year for six years. Invasive exotic plants will be eradicated if found.
- Living or dead trees that show signs of active wildlife use (i.e., nests, occupied cavities) will be marked in the field and will not be removed during fuel reduction activities.
- Tree snags that can be retained without compromising wildland fire safety shall be preserved.

- Dead fallen trees that can be retained without compromising wildland fire safety shall be preserved.
- Pinecone caches used by squirrels and other small mammals shall not be disturbed.
- Following the burning of slash piles, the soil that was under the slash pile will be scarified using hand tools, and topsoil and duff will be borrowed from the surrounding area and spread inside each burned circle.
- A wildlife survey will be conducted just prior to commencing fuel reduction activities or prescribed burning in order to identify important wildlife resources that may need to be protected.

XI. FIRE CRITIQUES AND ANNUAL PLAN REVIEW

Wildland fire and prescribed fire critiques will be conducted in accordance with NPS RM #18, Chapter 13 and the Interagency Standards for Fire and Fire Aviation Operations, Chapter 19:

- All wildland fires and fire-related incidents will be reviewed. All prescribed fires will be reviewed as appropriate.
- Reviews are conducted for one or more of the following purposes:
 - To examine the progress of an on-going fire incident and to confirm effective decisions or correct deficiencies.
 - To identify new or improved procedures, techniques, or tactics.
 - To compile consistent and complete information to improve or refine park, regional, or national fire management programs.
 - To examine unusual fire-related incidents in order to determine cause(s), contributing factors, and where applicable recommend corrective actions. If negligence is indicated, the circumstances will be reported and investigated in accordance with applicable regulations, policies or guidelines.
 - To determine the cost effectiveness of a fire operation.
- The authority to convene a fire review rests with the Park Superintendent, Intermountain Regional Director, or the NPS Associate Director of Park Operations and Education. It is the clear responsibility of the Park Superintendent to call for a review, to ensure timely completion, and to implement recommended actions. The Intermountain Regional Director has responsibility to follow-up with the Park Superintendent that reviews are established and completed in a timely manner, and that recommended actions are completed. The Park Superintendent may request technical support from NPS Fire Management Program Center, Intermountain Regional Office, park, or interagency personnel with the appropriate expertise.
- All wildland fire incidents which result in human entrapment, fatalities, or serious injuries, or result in incidents with potential, will be investigated and reviewed.
- The NPS Associate Director of Park Operations and Education will convene an ad-hoc team to review Service-wide fire management programs subsequent to the occurrence of any significant, controversial or unusual wildland fire management activities.
- All reviews will be conducted as constructive critiques aimed at determining the facts related to the specific fire or fire management program. They will identify commendable actions, techniques and decisions as well as areas that need improvement. Reviews are intended to resolve operational issues, not impose punitive actions.

Additionally all fire and program reviews will be conducted in accordance with NPS RM #18, Chapter 13.

All NPS units, including RMNP, are required to review and update their fire management plan annually. This review is essential to ensure that the plan continues to conform to current laws, objectives, procedures, and strategies. A plan revision, and a review of NEPA compliance, is required by agency policy every five years.

XII. CONSULTATION AND COORDINATION

The 2004 Fire Management Plan for Rocky Mountain National Park (RMNP) was prepared based upon the fundamental principles set forth in the 1992 Fire Management Plan and Environmental Assessment in combination with the fuels management strategies identified in Rocky Mountain National Park's 2002 Environmental Assessment for Wildland-Urban Interface Fuels Management.

The information contained within this document was organized to conform to the format identified in NPS Reference Manual #18, Chapter 4. The individuals and organizations that were consulted in the development of the Environmental Assessments are identified in park compliance files that are maintained by the Division of Resources Management. The following individuals contributed to the development of this plan:

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