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February 17, 2026

Brian Nesvik
Director
U.S. Fish and Wildlife Service
Department of the Interior
1849 C Street NW
Washington, DC 20240

RE: RECOMMENDATION TO REMOVE THE UNNECESSARY PROHIBITION ON HOUND HUNTING OF MOUNTAIN LIONS ON THE CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE (CMR NWR)

Dear Director Nesvik,

As Montana-based hunting, angling, and conservation organizations, we appreciate the opportunity to contribute to effective and efficient wildlife management on federal lands. The Charles M. Russell National Wildlife Refuge (CMR NWR) is central to our outdoor heritage, supporting diverse species and the traditions of sustainable hunting.

We urge the U.S. Fish and Wildlife Service (USFWS) to eliminate the outdated prohibition on hound hunting of mountain lions on the CMR NWR. This regulation is unnecessary, inconsistent with current management practices on adjacent public lands, and imposes an arbitrary restriction that limits effective predator management without providing measurable conservation benefits.

Current Status (February 2026) Mountain lion hunting is allowed on the CMR, but hounds are prohibited. Per CMR NWR hunting regulations:

Mountain Lion HD 410, 600, 620, and 700 Archery Only Season Without Dogs - Same as State season. Fall Season Without Dogs – Same as State season. • Winter Season is not valid on the Refuge. • Use of dogs or recorded animal sounds to hunt mountain lion is prohibited.

Hound hunting is already safely and successfully practiced on U.S. Forest Service, Bureau of Land Management, state land, and private land, with more than a decade of data showing zero grizzly

conflicts (nearest confirmed grizzlies are over 50 miles away). There is no ecological, safety, or administrative justification for maintaining this unique prohibition on the CMR, especially when it hinders the ability of hunters to contribute to balanced predator management in the refuge's vast, rugged 1.1-million-acre terrain. This regulatory change aligns directly with Secretarial Order 3447 (signed December 16, 2025), which expands hunting and fishing access across Department of the Interior lands and waters by requiring an "open unless closed" approach eliminating needless regulatory or administrative barriers, ensuring consistency, and placing the burden on managers to justify any closures based on law, public safety, or resource protection. Removing the hound-hunting restriction on the CMR is a clear, low-effort opportunity to implement this directive on USFWS-managed lands, restoring uniformity with adjacent public lands and advancing the order's goal of efficient, science-based management.

The specific change we recommend is straightforward: revise the mountain lion hunting regulations on the CMR NWR to read:

Mountain Lion HD 410, 600, 620, and 700 Archery Only Season - Same as State season. Fall Season – Same as State season. Mountain Lions may be hunted with dogs, same as State seasons.

This revision would allow hunters to use proven, selective hound methods already permitted elsewhere, without introducing new risks or altering other refuge rules. The process requires only a Refuge-Specific Hunting Plan Amendment and Compatibility Determination fully within the Refuge Manager's authority, and completable in a short period of time.

As an additional point of consideration, allowing hound hunting would enable more targeted lion removal, which could reduce predation pressure on vulnerable bighorn sheep populations in the Missouri River Breaks and support the recovery of other species, including mule deer and pronghorn, that are also impacted by high-density lion predation in isolated eastern Montana habitats. While disease remains the primary statewide limiter for bighorns, predation from high-density lions (sustained by abundant mule deer) amplifies vulnerability in these areas. Targeted management has been shown in similar systems to improve lamb-fawn survival and herd stability without requiring broad population control.

This low-controversy, manager-empowered change eliminates an unnecessary restriction, restores consistency with adjacent public lands, and provides modest conservation benefits to multiple species all while advancing the USFWS's commitment to efficient, science-based management under Secretarial Order 3447.

Montana's conservation community stands united in supporting this straightforward regulatory update. Thank you for your leadership in removing outdated barriers and ensuring federal lands remain accessible and functional for wildlife and the American public.

Sincerely,



William Israel
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Montana Outfitters & Guides Association

[ADDITIONAL ENDORSING ORGANIZATIONS]

- Foundation for Wildlife Management
- Montana Conservation Society
- Montana Sportsmen for Fish and Wildlife
- Montana Trappers Association
- Montana Wild Sheep Foundation
- Mule Deer Foundation
- Theodore Roosevelt Conservation Partnership