



April 14, 2020

Greg Ibach, Under Secretary for Marketing and Regulatory Programs  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Docket No. APHIS-2019-0018  
Regulatory Analysis and Development  
PPD, APHIS, Station 3A-03.8  
4700 River Road Unit 118  
Riverdale, MD 20737-1238.

RE: Agricultural Bioterrorism Protection Act of 2002; Biennial Review and  
Republication of the Select Agent and Toxin List

Dear Mr. Ibach,

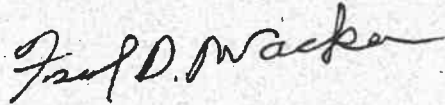
On behalf of the Montana Stockgrowers Association (MSGA) and the Montana Public  
Lands Council (MPLC), we would like to take this opportunity to submit comments  
regarding APHIS's proposed updates to the select agents and toxins registration list.

MSGA and MPLC are membership organizations that have worked on behalf of  
Montana's cattle ranching families since 1884. The membership of our associations  
consists of individual members and local affiliate groups, including ranchers of all ages,  
ranching operations of various sizes, feedlot operators, affiliate businesses, federal  
grazing permittees and private property owners. Our organizations and our members  
have significant and long standing interest in the management of *Brucella abortus*, due  
mainly to the high rate of exposure in wildlife in and around Yellowstone National Park  
(YNP). As you are aware, this disease is highly regulated in domestic cattle and bison by  
your department and has broad implications for the marketing of cattle and genetics from  
Montana. The regulation of *B. abortus* by USDA APHIS has led to the implementation of  
strict testing and management protocols for cattle in an area surrounding YNP known as  
the Designated Surveillance Area (DSA).

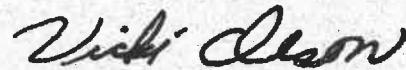
MSGA and MPLC support the APHIS proposed removal of *Brucella abortus* as a select  
agent and have confidence that it no longer needs to be regulated under this list. MSGA  
and MPLC agree that by removing *B. abortus* from select agent regulations, it will allow  
for additional research into vaccines for brucellosis. Our organizations see this as an  
essential step in the development of new or enhanced vaccines to control this disease in  
cattle and wildlife in the GYA. The current regulations and restrictions on *B. abortus*.  
have nearly eliminated the efforts to further vaccine research and other aspects of *B.*  
*abortus* control.

Due to the extent this disease impacts our state, MSGA and MPLC recommend APHIS moving forward to remove *Brucella abortus* from this select agents and toxin registration list. On behalf of our organizations, we would like to thank for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Fred D. Wacker".

Fred Wacker  
President  
Montana Stockgrowers Association

A handwritten signature in cursive script that reads "Vicki Olson".

Vicki Olson  
Chairman  
Montana Public Lands Council