



April 14, 2020

Samuel S. Edwin Ph.D., Director
Division of Select Agents and Toxins
Centers for Disease Control and Prevention
1600 Clifton Road NE, Mailstop H21-7
Atlanta, Georgia 30329

Docket No. CDC-2020-0024

RE: Possession, Use, and Transfer of Select Agents and Toxins; Biennial Review

Dear Dr. Edwin,

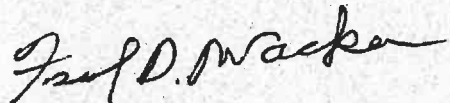
On behalf of the Montana Stockgrowers Association (MSGA) and the Montana Public Lands Council (MPLC), we would like to take this opportunity to submit comments regarding the Centers for Disease Control and Prevention (CDC) in the Department of Health and Human Services (HHS) review of the HHS list of biological agents and toxins that have the potential to pose a severe threat to public health and safety (HHS select agents and toxins).

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 USDA Animal and Plant Health Inspection Service (APHIS) 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).

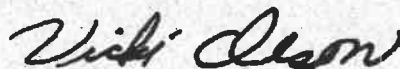
MSGA and MPLC support the APHIS proposed removal of *Brucella abortus* as a select agent and have confidence that it no longer needs to be regulated under USDA or the HHS/CDC list. MSGA and MPLC agree that by removing *B. abortus* from select agent regulations, it will allow for additional research into 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 HHS/CDC 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, reading "Fred D. Wacker".

Fred Wacker
President
Montana Stockgrowers Association

A handwritten signature in cursive script, reading "Vicki Olson".

Vicki Olson
Chairman
Montana Public Lands Council