

Public Comment on the Select Agent Status of *Brucella Abortus*

submitted by

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The Property and Environment Research Center (PERC) respectfully submits the following comment on the Select Agent status of *Brucella abortus*. PERC is a 40-year-old nonprofit research and conservation institute located in Bozeman, Montana, dedicated to enhancing environmental quality using property rights and markets. PERC's staff and associated scholars conduct original research that applies market-based principles to resolve environmental disputes in a cooperative manner, with an emphasis on public and private land and wildlife issues.

We write to highlight the benefits that removing *B. abortus* from the Select Agent list could provide to working landowners in the Greater Yellowstone Ecosystem (GYE) and the wildlife populations that rely on those landowners for habitat. In particular, private ranchlands in the GYE provide crucial winter habitat for the region's migratory herds of elk and other ungulates.¹ Conserving these migratory corridors has been identified as a priority for federal and state policymakers, with an emphasis on conserving winter range habitat on private lands.²

Ranchers' tolerance of elk is often low in large part because of risks associated with *B. abortus* transmission to the cattle herds that sustain ranchers' livelihoods and rural communities. Our recent surveys and conversations with ranchers in Montana's Paradise Valley have indicated that brucellosis is one of their chief concerns and that it reduces their willingness and ability to participate in corridor conservation efforts. In the words of one rancher we surveyed for a forthcoming publication, "If we improve habitat [for elk] we're basically shooting ourselves in the foot because of the increased brucellosis risk."³

¹ Todd Wilkinson. 2019. "The Marvelous Migrations of Greater Yellowstone." *PERC Reports*. Vol. 38, No. 2. <https://www.perc.org/2019/12/06/the-marvelous-migrations-of-greater-yellowstone/>

²Department of the Interior Secretarial Order No. 3362, "Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors." https://www.doi.gov/sites/doi.gov/files/uploads/so_3362_migration.pdf
Montana Action Plan October 2019, "Implementation of Department of the Interior Secretarial Order 3362: 'Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors.'" <https://www.nfwf.org/sites/default/files/rockymountains/Documents/Montana2020ActionPlan.pdf>

³ Whitney Tilt. Forthcoming. "Ranching and Wildlife in Paradise Valley: The Landowner Perspective." Property and Environment Research Center.

This attitude is only natural considering the high cost that a positive test for brucellosis can impose on ranching families. According to the most recent assessment in 2016, quarantining a herd of 400 in response to one positive brucellosis case can cost a rancher nearly \$150,000.⁴ The alternative to quarantine is “depopulation,” or slaughtering every animal in an infected herd.

With *B. abortus* on the select agent list, existing restrictions impose significant obstacles for the development of a more effective vaccine or additional tools to respond to brucellosis infections in livestock herds. If deemed safe, we support the delisting of *B. abortus* from the Select Agent List so that effective research can be conducted toward the development of improved vaccination, diagnostics, and other management options. This research will be a crucial step toward improving the resilience of private working lands, sustaining rural communities, and increasing tolerance of migratory elk and other ungulates.

⁴ Boroff, K., Kauffman, M., Peck, D., Maichak, E., Scurlock, B., & Schumaker, B. 2016. “Risk Assessment and Management of Brucellosis in the Southern Greater Yellowstone Area (II): Cost-benefit Analysis of Reducing Elk Brucellosis Prevalence.” *Preventive Veterinary Medicine*, 134, 39-48.