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March 12, 2025

Secretary Brooke Rollins  
Department of Agriculture  
1600 Pennsylvania Ave NW  
Washington, D.C. 20500  
*Via email to agsec@usda.gov*

Re: February 26, 2025 OPM Memorandum – USDA ARS U.S. Sheep Experiment Station

Dear Secretary Rollins:

The Montana Wool Growers Association (MWGA) understands the United States Department of Agriculture (USDA) and USDA Agricultural Research Service (ARS) are under pressure to reduce and reorganize the agency. While MWGA appreciates the intent of the Office of Personnel Management's (OPM) February 26, 2025 memorandum, we urge you to actively defend and preserve the functionality of the **U.S. Sheep Experiment Station** in Dubois, Idaho (the "Sheep Station" or "USSES"). The Sheep Station is critical to the livestock industry, rural community livelihood, national food security, and national food production, and fulfills missions that are required by statute.

The February 26th OPM Memorandum instructs the USDA to consolidate and reduce wherever there is redundancy within the agency, in part by eliminating non-statutorily mandated functions. MWGA does not doubt there are places within the USDA that can be reduced and consolidated without affecting function, but the USSES is not one. The Sheep Station is a one-of-a-kind facility that is not replicated anywhere else. The tasks performed at the Sheep Station are critical to national food and fiber production and are mandated by statute.

Congress has been explicit. "[A]gricultural research, extension, and teaching are distinct missions of the Department of Agriculture."<sup>1</sup> Agricultural research is defined as "research in the food and agricultural sciences,"<sup>2</sup> which includes animal health, animal production, animal well-being, food safety, rangeland management, and "soil, water, and related resource conservation and improvement."<sup>3</sup> By statute, the USDA *must* "assure that national agricultural research, extension, and teaching objectives are fully achieved, and assure that the results of agricultural research are effectively communicated and demonstrated to farmers, processors, handlers,

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<sup>1</sup> 7 U.S.C. § 3102(1).

<sup>2</sup> 7 U.S.C. § 3103(2).

<sup>3</sup> 7 U.S.C. § 3103(9).

consumers, and all other users who can benefit therefrom.”<sup>4</sup> If the USDA neglects agricultural research, extension, and teaching, it fails in the very role set out for it by Congress.

In addition to its general directives, Congress spelled out specific objectives for ARS. These objectives include (1) “enhanc[ing] the competitiveness of the United States agriculture and food industry in an increasingly competitive world environment”; (2) “increas[ing] the long-term productivity of the United States agriculture and food industry while maintaining and enhancing the natural resource base on which rural America and the United States agricultural economy depend”; (3) promoting “economic opportunity in rural communities”; (4) improving production, processing, and added-value for food and fiber resources; and (5) improving animal breeds to promote a safe, nutritious, and efficient food supply.<sup>5</sup>

The Sheep Station is a critical component of ARS’s mission.<sup>6</sup> The research performed at USSES cannot be performed at any other facility in the United States (or the world). The qualities that make the USSES unique are its location, landscape, and infrastructure. Unlike most animal research facilities, the Sheep Station incorporates 48,000 acres of ARS-owned native rangeland and forests representative of the public and private lands that nearly 40% of the nation’s ranchers rely on to feed their livestock. The Sheep Station’s vast rangelands are what allow the Station to fulfill ARS’s statutory mandate for research that cannot be performed anywhere else. It is a living laboratory: a high-altitude rangeland that experiences the same social pressure, climate variations, and complications with balancing food and fiber production, ecological advancement, and competing land uses (like recreation and development) as are encountered by livestock producers all over the western United States.

Another important component of the Sheep Station is its history. For research to be significant, it must be consistent and well-established. The USSES was chartered in 1916, and has been conducting research at the same location, on the same rangelands since that date. The Sheep Station has over 100 years of consistent data collection. To move the facility or change its conditions would be to throw away (or at least devalue) more than 100 years of carefully collected information. This would not be cost-efficient. MWGA urges ARS and the USDA to carefully consider the irreplaceability of the Sheep Station as it builds its budget and plan for the coming years.

If the federal government’s objective is efficiency, the Sheep Station should serve as a model and receive *more* funding, not less. Unlike many facilities, the Sheep Station has the capacity to incorporate more research efficiently (with a proportionate increase in funding and staff). The USSES already has the land, animals, infrastructure, and legacy records to accommodate research. This research can be performed more efficiently and effectively on USSES’s agency-owned ground than at research units housed in leased facilities. If consolidation is needed, the Sheep Station should be regarded as an essential component of ARS’s future and a central hub for research projects.

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<sup>4</sup> 7 U.S.C. § 3102(2).

<sup>5</sup> 7 U.S.C. § 3101.

<sup>6</sup> See Public Law 97-98, 95 Stat. 1328 (Dec. 22, 1981) (granting the Secretary of Agriculture sole administrative jurisdiction over the United States Sheep Experiment Station in Idaho and the summer range in Montana).

The research performed at the Sheep Station, described in detail below, directly responds to ARS's statutory mandate. It is vital that this research continue fully funded for the benefit of the sheep industry, the rangelands, rural economies, and national food and fiber supply and security.

### Developing and Improving Sheep Genetics

The heart of the USDA and ARS is food production. At its core, ARS's mission is to promote the U.S. food industry through innovation and research, thereby increasing the competitiveness, productivity, safety, and security of the nation's agriculture.<sup>7</sup> Ever since genomes were discovered, they have been at the center of scientific research. The Sheep Station has been studying sheep genetics for over 100 years. The work includes developing and/or improving sheep breeds (a function specifically outlined in statute<sup>8</sup>). The Sheep Station is directly responsible for developing three of the nation's most influential breeds: Columbia, Targhee, and Polypay. In fact, genetics developed at the Sheep Station are represented in over 60% of the entire U.S. sheep inventory. Every American wool garment and lamb chop is, in some way, connected to the Sheep Station's research programs.

### U.S. Sheep Genomic Reference Flock

In line with its responsibility to promote food and fiber safety and security,<sup>9</sup> the Sheep Station has partnered with the University of Idaho to develop the first U.S. Sheep Genomic Reference Flock. This powerful genetic tool will be used nationally and internationally to promote animal health, identify economically relevant traits, and allow farm-to-table traceability. These capabilities translate to higher quality food and fiber products, increased resilience and production efficiency in a changing environment and climate, and improved ability to respond to and mitigate catastrophic disease.

### Rangeland Research – Fire and Grazing

Congress has acknowledged the need for rangeland research and directed that ARS “promote the general welfare through improved productivity of the Nation's rangelands.”<sup>10</sup> With a steadily increasing world population and changing climate, food scarcity is a constant concern. “Recent resource assessments indicate that forage production of rangeland can be increased at least 100 per centum through development and application of improved range management practices while simultaneously enhancing wildlife, watershed, recreational, and aesthetic values and reducing hazards of erosion and flooding.”<sup>11</sup> The work called for by Congress is being performed right now at the Sheep Station.

The Sheep Station is studying the use of fire and grazing to promote productive and resilient rangelands and control undesirable species,<sup>12</sup> use of collaborative land management to support

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<sup>7</sup> 7 U.S.C. § 3101(1)–(3).

<sup>8</sup> 7 U.S.C. § 3101(9) (requiring ARS to “support international collaboration that leverages resources and advances priority food and agricultural interests of the United States, such as— . . . (B) improving . . . animal breeds”).

<sup>9</sup> See 7 U.S.C. § 3101(1)–

<sup>10</sup> 7 U.S.C. § 3331.

<sup>11</sup> 7 U.S.C. § 3331.

<sup>12</sup> 7 U.S.C. § 3332 (describing a need for studies that address “revegetation and rehabilitation of rangelands including the control of undesirable species of plants”).

food and fiber production on rangelands, and use of improved tools to promote harmony between livestock production and wildlife conservation. Although there are other locations performing rangeland research, the Sheep Station is unique in its size, location, and concentration. As its name suggests, the Sheep Station studies sheep; it is the only research facility with the land, animals, and location necessary to intensively analyze ways sheep grazing can improve rangeland health and production on a large scale. The USSES is also the only ARS research facility in the upper intermountain west with core sagebrush habitat and forested lands, allowing for extensive fire studies and wildlife habitat research. Unlike most experimental range plots, the vast ARS-owned rangelands allow for extensive long-term research studies that could not be performed consistently anywhere else. In addition, the Sheep Station has 100 years of legacy rangeland, fire, and grazing research and nearly 70 years of sage grouse research at its disposal. The value of this research is lost if consistency is taken away, so location is important.

The Sheep Station's rangeland research extends beyond the livestock industry. It also guides and informs land management agencies (including the USDA Forest Service, Bureau of Land Management, and state agencies), wildland and prescribed fire managers and operators, wildland conservation groups, and university partners. The controlled environment in which the Sheep Station operates allows the researchers to perform consistent data collection and research that cannot be replicated by other federal and state agencies. As a result, the information gleaned from research at the Sheep Station feeds into best management practices for federal and state land management agencies who must develop livestock grazing plans, mitigate catastrophic wildfire risk, mitigate the risk of invasion by undesirable species, accommodate recreational use, and perform environmental regulatory planning.

### Rangeland Research – Supporting Ranching and Multiple Use

One of the biggest challenges in modern agriculture is navigating social dynamics. The allure of majestic mountains and wildlife in the western United States can, at times, conflict with use of the western rangelands for food and fiber production. The Sheep Station is actively engaged in collaborative research to promote multiple use and social tolerance for agriculture by bringing stakeholders together to develop mutually beneficial solutions to land use dilemmas. As the history of the Sheep Station's living laboratory has shown, social pressure and lawsuits can interfere with food production as much, if not more, than disease, climate, economy, and other factors. As a result, the USSES's collaborative work is directly responsive to Congress's mandates to "increase the long-term productivity of the United States agriculture and food industry while maintaining and enhancing the natural resource base on which rural America and the United States agricultural economy depend" and "support agricultural research and extension to promote economic opportunity in rural communities and to meet the increasing demand for information and technology transfer throughout the United States agriculture industry."<sup>13</sup>

Here again, the Sheep Station's location is uniquely suited to the research. The Sheep Station's vast rangelands span multiple elevations with different ecosystems and include both public and private land, making it one of the only locations in the United States where researchers can study transhumance (livestock systems that rely on moving livestock across seasonal ranges to match livestock needs with forage quality). This research will become increasingly important as our

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<sup>13</sup> See 7 U.S.C. § 3101(2), (4).

climate continues to change, because transhumant systems are some of the most resilient and capable of surviving harsh environments and changes in social and ecological conditions. The Sheep Station also lies in the heart of wildlife habitat and, more specifically habitat for protected wildlife (sage grouse, bighorn sheep, wolves, and grizzly bears), which allows researchers to study wildlife/livestock interactions and have conversations with stakeholders that could not take place anywhere else in the nation.

MWGA has fought hard to keep this premier USDA-research institution operating for the benefit of the livestock industry, rural America, and the nation. The work performed at the Sheep Station is essential and cannot be replicated anywhere else. To fulfill their statutory mission, the ARS researchers need the sheep, the rangelands, and the infrastructure found only at the Sheep Station. And to continue performing their vital work, they need staff and funding, including the seasonal staff who care for the sheep and collect data on the animals and the rangeland.

The USSES is vital to livestock production, to national food safety and security, to national animal health and biosecurity, to food and fiber supply, to rural economies, and to the long-term productivity and competitiveness of the United States agriculture and food industry. We ask you to recognize the importance of these functions, which are set out in statute, by fully funding and staffing the Sheep Station. If budgetary cuts are unavoidable, we ask that you consult directly with the Research Leader at the Sheep Station to determine when or where adjustments can be made that will not affect the efficacy of the research programs.

Thank you for your careful consideration of the essential work performed by the Sheep Station.

Sincerely,



Samuel Ortmann  
MWGA President

cc: MWGA Board of Directors  
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