

SOUND AGRICULTURAL PRACTICE
Opinion Number 17-2

SUBJECT: Request for an Opinion Pursuant to Section 308 of the Agriculture and Markets Law as to the soundness of the use of livestock guardian dogs by John Lemondes to protect his sheep.

REQUESTOR: John Lemondes
3390 Eager Road
Jamesville, New York 13078

Preliminary Statement

On May 15, 2017 John and Martha Lemondes requested that the Commissioner issue an Opinion as to the soundness of the use of livestock guardian dogs to protect their sheep from predation. This request arises from complaints received from a neighbor about the barking of the livestock guardian dogs, particularly at night.

The Department conducted a sound agricultural practice review for the use of livestock guardian dogs on multiple parcels of land, in a contiguous block, owned by John and Martha Lemondes.

The following information and findings have been considered in reaching this Opinion.

Information Considered in Support of the Opinion

THE FARM

1. On May 28, 2017, Dr. Robert Somers, Manager of the Farmland Protection Program, visited the John and Martha Lemondes property to examine their use of two Great Pyrenees Mountain livestock guardian dogs to protect the farm's sheep (a flock of 62 breeding ewes and three rams) from predation. The Lemondes also have a family pet, a Mountain Kur, that is used to herd the sheep as well as warn the family of any occurrences outside of their home. Barking arising from the Mountain Kur, or any related on-farm behavior, is not a source of any complaints from neighboring landowners, and is therefore outside the scope of this opinion.
2. Mr. Lemondes stated that both he and his wife are employed off the farm during the day and it is imperative that they have livestock guardian dogs present to protect the flock from constant threats of predation consisting of coyotes, eagles, and other wild carnivores.
3. Mr. Lemondes, farmer and owner of the farm, stated that he and Martha raise a crossbreed of sheep, consisting of Cheviot, Perendale and Rambouillet breeds. He stated that this cross breed of animal provides medium textured wool, grows quickly

and is a good meat animal. Mr. Lemondes began his breeding program in 2014 and plans on increasing the flock to 500 animals so they can compete in the marketplace with the larger farms in the Northeast. Their marketing plan for the sheep includes raising and selling breeding stock and selling meat, wool, and pelts. They also have an agreement with a commercial kitchen to begin making stock broth from their animals.

4. According to tax assessment rolls for Onondaga County, the Lemondes own seven contiguous parcels of land consisting of 436.52 acres in the Town of LaFayette, Onondaga County, New York. [Tax Parcel ID No's: 006.-02-01.0, 006.-02-04.0, 006.-02-13.2, 007.-01-1.0, 007.-02-06.2, 007.-02-06.3, and 007.-02-07.0] According to the 2017 Final Assessment Roll, all seven parcels are subject to an agricultural assessment.
5. The Lemondes purchased the farm in November of 2013 and have been working with the United States Department of Agriculture's Natural Resources Conservation Service (NRCS) to clear fields overgrown by successional vegetation through years of neglect by the prior owner. They currently use three pastures for the grazing of their sheep, consisting of approximately 15, 20 and seven acres. The pastures have new fencing, as part of an Environmental Quality Incentives Program (EQIP) contract with NRCS. The fencing consists of treated posts, with 4-foot woven wire stretched tight between the posts. There is also one strand of electrified wire at the bottom of the fence and one strand of electrified wire at the top of the fence. Furthermore, each pasture is watered by a new well and distribution system that is part of the NRCS contract. As the land is cleared, it is planted to grass for forage and for the production of hay. These land clearing activities are part of the farm's Nutrient Management Plan. The NRCS plan is titled "2015 Nutrient and Soil Management Plan, Oneida Lake Watershed." The plan was produced by Hall Environmental and Land Planning.
6. Mr. Lemondes stated that the sheep are managed in a rotational grazing system and the animals are moved between pastures on a regular basis. Their plan calls for 1.5 animal units per acre.

MR. LEMONDES' USE OF GUARDIAN DOGS

7. Mr. Lemondes stated that he purchased the dogs at the same time as the sheep. They were 10 months old when purchased from a dog breeder and, up until their relocation to the farm, they learned from their parents how to guard sheep. The dogs are used together, and apart, if the sheep flock is split and placed into two separate pastures.

8. According to Mr. Lemondes, all three dogs have microchip implants, receive regular rabies vaccinations, and are licensed. The farm participates in the NYS Sheep/Goat Health Assurance Program (NYSSGHAP). This program is designed to increase herd health, productivity and profitability, assures food safety and public health, and promotes environmental stewardship. Mr. Lemondes stated that Dr. Patrina Ashley, DVM, is a NYS Department of Agriculture and Markets Veterinarian that helped develop the farm's integrated herd management plan. Dr. Ashley stated that the NYSSGHAP program is voluntary. Mr. Lemondes' participation in the program shows that he is "...concerned about the health and well-being of his animals and is actively seeking resources to achieve optimum health and performance in his flock." Dr. Ashley stated that their annual review with the farmer is not meant to be an inspection, but a meeting to discuss the use of best management practices to maintain flock health, productivity and well being.
9. In a June 2, 2017 e-mail to Dr. Somers, Dr. Ashley indicated that, on March 8, 2016, she visited the farm with Drs. Art Sherman and Katherine Dart, DVMs. They met with Mr. Lemondes during his initial NYSSGHAP enrollment meeting. Dr. Ashley stated that she, Emily Cachione, Animal Health Technician with the Department and Dr. Dart then met with Mr. Lemondes again on March 28, 2017 for an annual review meeting. A written herd plan, dated March 28, 2017, was created during this meeting with the assistance of all parties in attendance. The written plan did not include an entry on the use of livestock guardian dogs because the use of dogs was already an established farm practice on the property. She stated that at the time of their visit, the dogs were well cared for, given proper veterinary attention; including vaccinations, worming and nutrition. It was reported that the Mountain Kur (family pet) had been attacked by a wild canine and exhibited significant injuries and the Lemondes had lost chickens due to predators. She observed the livestock guardian dogs, one in the pasture and one in the barn and they did not bark while she was on the farm. Dr. Ashley indicated that the Lemondes reported multiple sightings of coyotes in close proximity to the house and nearby buildings. She wrote that, with confidence, she can state that Mr. Lemondes' flock of sheep "must be guarded from predation...[and]...absolutely need protection against the ever present wild carnivores that populate the proximity of his farm." Dr. Ashley also stated that both predation and prevention of predation is of a 24/7 nature, and that the use of guard dogs is an age old practice that offers protection of this against such predation.
10. Mr. Lemondes stated that from December through the beginning of May, the sheep are moved to the front pasture, nearest to Eager Road, and the closest pasture to the complaining neighbor. The sheep are moved to that location to care for the animals during winter and to provide access to barns for shelter. The barns are also used for spring lambing. Mr. Lemondes indicated that as herd numbers increase, his plans include improving the land owned across the road from his residence and integrating the 99 acre parcel into his grazing plan. This parcel of land surrounds

two sides of the complaining neighbor's residence. Once this pasture is improved and used by the flock, he expects the complaints from the neighbor to increase. Mr. Lemondes informed Dr. Somers that the sheep are placed in that pasture during the winter months due to its proximity to their residence and their barns, which are used for feeding, lambing and shelter.

NEIGHBOR COMPLAINT

11. On several occasions, when the livestock guardian dogs bark, one neighbor, located across the road from the farm residence (3345 Eager Road, Jamesville, NY), has sent text messages to Mrs. Lemondes to complain. The neighbor has also called the Town Supervisor, the State Police and the Town dog control officer to complain. Mr. Lemondes stated that the neighbor moved in after the farm was established and was provided a disclosure statement (AML Section 310) prior to their purchase of the home. The Lemondes also stated that the neighbor came to the house one day and threatened to have all three dogs euthanized.
12. According to Mr. Lemondes, he has not been cited for a violation of any local law and has not received any citations from the police that were called to investigate the neighbor's complaint. Mr. Lemondes stated that the State Police came to the property one day due to a dangerous dog complaint. The officer came to the front door, stated his reason for being there, described the dog and asked about the same. Mr. Lemondes stated that he told the officer that the purported dangerous dog is the one at his feet. Due to the friendly nature of the dog, the officer made a statement that this was a waste of his time and he promptly left the farm.

BARKING ISSUE

13. Dr. Somers indicates that, when he visited the farm on May 28, 2017, the livestock guardian dogs were quiet and did not bark during his visit to the farm (from 10:00 am to 12:30 pm). They also did not bark when he viewed the sheep in two of the pastures. Both dogs, located in two separate pastures at the time of the visit, perceived Dr. Somers due to his close proximity to the animals, but did not respond to his presence. Dr. Somers did hear dogs from neighboring properties barking, off and on, during his visit to the farm. At the time of Dr. Somers' visit, the Mountain Kur was very friendly, did not bark, and wanted to be pet.
14. On June 2, 2017 the Department mailed letters to 25 property owners adjoining the seven parcels owned by John and Martha Lemondes. The Department notified the adjoining landowners that the Department is conducting a sound agricultural practice review and invited them to comment on the keeping of livestock guardian dogs by the Lemondes to protect their livestock from predation. The neighboring landowners

were requested to submit comments by June 29, 2017. The Department received one letter from a neighbor and received verbal comments from three landowners.

15. In a letter dated June 22, 2017, a neighbor to the Lemondes farm stated that she has no problems with the use of the dogs on the farm. She stated that there are numerous coyotes in the area and she is often lulled to sleep by their calls. She also stated that coyotes have been observed in her yard. Similar to other farmers' use of dogs in the area, she indicated the use employed by the Lemondes is an ideal way to protect the flocks from predation. She stated that it is the most humane way to deal with coyotes since the dogs only protect the livestock and do not kill the coyotes. She writes that her family often walks by the flocks of sheep when they are attended by the dogs. She has not once felt threatened by the dogs and they have never barked at them. She stated that it is very rare that they even hear the dogs barking. When they do bark, she assumes they are doing their job.
16. On June 23, 2017 Dr. Somers spoke with a neighbor that lives adjacent to a pasture used by the Lemondes to graze their sheep. He stated that he does not have any problems with the livestock guardian dogs. He hunts on the Lemondes property and has taken images of numerous coyotes and fox on his trail cam. He said that the dogs' demeanor is great, they do not bite, and he gives them biscuits at night. When the Lemondes go on vacation, he volunteers to take care of the animals. He surmised that when people move to the country and they are not used to normal agricultural activities, they have a tendency to complain.
17. On June 30, 2017 Dr. Somers spoke with a neighbor that lives across the road from the Lemondes' home and the pasture nearest to Eager Road that is used as a winter pasture. The neighbor stated that the dogs and the sheep are moved to this pasture during the winter and during lambing season. He stated that the Lemondes take good care of their livestock. On one occasion, the livestock guardian dogs were not in the fenced area and were off the property. The neighbor said that they just looked at him, were not aggressive and sat under an apple tree until they were retrieved by Mr. Lemondes. He stated that coyotes are prevalent in the area and he hears packs howling during the night. He stated that other animals make a lot of noise as well, including raccoons. He indicated that his bedroom window faces the road and the dogs do not keep him up at night. He stated that the dogs bark at people walking on the road or when emergency sirens are engaged. All of the dogs in the area bark when the latter occurs.
18. On June 30, 2017 Dr. Somers spoke with the complaining neighbor. She was asked to submit her comments in writing so that her complaint could be accurately reflected in the Opinion. On the phone, however, the complainant stated that the barking nuisance occurs when the dogs are in the pasture closest to their house. The

complainant stated that she does not have an issue with the dogs during the summer because they are located in pastures further from their residence.

19. On July 21, 2017 Dr. Somers received an e-mail from the neighbor. The complainant stated that she has reached out to the Town of LaFayette's Dog Warden regarding the barking of both the livestock guardian dogs and the family pet, a Mountain Kur in relation to events occurring off of the Lemondes property.
20. In addition, in the July 21, 2017 e-mail correspondence, the complainant also submitted text messages between her and the Town's Dog Warden as well as messages between her and Martha Lemondes. After receiving a complaint on April 18, 2015, the dog warden visited the property three times that day, with three different vehicles. He stated that it appeared that no one was home at the Lemondes residence and that he did not hear the dogs barking. After this communication, the complainant then visited with the Lemondes to make them aware of the barking issue and the aggressive nature of the Mountain Kur that occurred outside of the Lemondes property. She also reached out to the Town Supervisor, who informed her about the nuisance law.
21. The July 21, 2017 e-mail correspondence also indicates that, on March 6, 2016, the complainant sent a text message to Martha Lemondes to complain about the dogs barking. Mrs. Lemondes responded that the coyotes were howling the last two nights and the dogs were doing their job by keeping them away from the sheep and the lambs. She also asked if the Mountain Kur had been bothering the complainant since they last spoke, to which the complainant responded no, and was told that they have kept him confined unless they are home. According to the correspondence, there were three more text messages in the spring of 2016.
22. Also specified in the July 21, 2017 e-mail correspondence, the complainant was asked by then Town Supervisor, Andy Ohstrom (spelled by the complainant as "Oitstrom") to keep a log of when the dogs bark. April 23, 2017 was the first entry and additional entries occurred on April 24th and 25th, May 4th, 5th, 8th and 9th, and 27th. The neighbor also complained about Mr. Lemondes mowing his lawn at 10 pm.
23. With the July 21, 2017 e-mail correspondence, the complainant also submitted a police report from the Onondaga County Sheriff's Office. The report states that the neighbor called complaining about a dog barking earlier in the evening. The Officer spoke with the neighbor and then went to the Lemondes residence. He stated that he was unable to make contact with the Lemondes. The report states that he did not hear the dogs barking and the case was closed.

THE USE OF LIVESTOCK GUARDIAN DOGS

24. In *Livestock Guarding Dogs: Their Current Use World Wide*, Mr. Robin Rigg states that livestock guarding dogs protect animals from external threats. They are social animals, stay in a group and protect the flock as if they were part of its group. They are attentive to their wards, drive away intruders and livestock guardian dogs are "...the most cost effective method of non-lethal predator control." Benefits of their use on the farm include: not needing to corral animals at night, alerting the owners if they perceive a danger, protecting the owner's property, reducing predation, and allowing for a more efficient use of pastures. (Robin Rigg, Department of Zoology, University of Aberdeen, 2001)
25. The USDA Information Bulletin Number 588 (as revised 1999) states that the use of livestock guardian dogs has made a resurgence due to federal restrictions on the use of substances in the elimination of predator species, the inability to provide adequate protection from certain predators using conventional methods of livestock protection, and the desire by some individuals to use nonlethal methods to control predation. The dogs, when acquired at a young age, assimilate and become part of the flock they are protecting. They stay with the flock day and night and act independently; they are not pets. The authors state that both coyotes and foxes avoid confrontation and stay a reasonable distance from the livestock when they know that a guardian dog is present. They suggest that the sole use of guarding dogs to protect livestock from predation does not eliminate the need to use other control methods. Other methods mentioned include the use of electric fences and mechanical scare devices; corralling animals at night; keeping the barn or corral illuminated at night; keeping the animals near human habitation; or trapping and shooting predators. (USDA Information Bulletin Number 588, 1999, *Livestock Guarding Dogs Protecting Sheep from Predators*).
<https://pubs.nal.usda.gov/sites/pubs.nal.usda.gov/files/LivestockGuardingDogs.pdf>
26. On March 13, 2006 Matt Brower, Department Associate Environmental Analyst, contacted Jeffery S. Green, Regional Director for the United States Department of Agriculture Animal and Plant Health Inspection Service (APHIS), to gather information on the protection of livestock against predators for a prior Opinion. Mr. Green stated that he has worked extensively with Great Pyrenees guard dogs and that their behavior is based on instinct. He indicated that this breed does not typically bark constantly, but it could happen.
27. According to a publication from the Great Pyrenees Club of America (*Great Pyrenees Club of America: Livestock Guard Dogs*. Rev. 1991) this breed of dog is "...a territorial guard by nature, which means that he works to keep his territory free from predatory danger." The publication states that if the dog is performing properly, "...the stockman may never see a predator, and the flock will never be disturbed."

28. According to a publication from Colorado State University (*Livestock Guard Dogs, Llamas and Donkeys*. Andelt, W.F. No. 1218. Rev. 10/04) "[g]uard dogs significantly reduce coyote predation on domestic sheep in Colorado." The publication also states that "[p]roducers using guard dogs reported a lower percent sheep loss than producers using llamas."
29. In a 2015 publication concerning sheep and lamb deaths in the United States¹, APHIS reports that sheep and lamb death losses in 2014 amounted to 585,000 animals at an approximate cost of \$102 million. This is a decrease in loss from the previous 2009 survey results. The report states that in 2015, 28.1 percent of sheep losses and 36.4 percent of lamb losses were attributed to predators. It reports that farmers used a combination of practices to control predation, including fencing (54.8 percent of operations), guard dogs (40.5 percent), lamb sheds (34.4 percent) and night penning (33.7 percent). In New York, the document indicates that, in 2014, 23 lambs were lost to eagles, 794 to coyotes and 27 to dogs. In addition to the lamb losses, 347 sheep were lost to coyotes. Furthermore, 107 sheep and 137 lambs were injured by predators. It appears that nationally, the use of livestock guardian dogs by farm operations to protect sheep and lambs from predation increased from 28.2 percent in 1999 to 40.5 percent in 2014. The data suggests that in 2014, farm operations located in New York used livestock guardian dogs (28.9 percent), fencing (82.0 percent) and/or lamb sheds (41.7 percent) to protect their flock from predation.

EXISTING THREAT

30. Mr. Lemondes informed Department staff that, in his experience, the loss rate for sheep in the western portions of the United States is 10 to 15 percent of the flock per year. Presently, Mr. Lemondes states that the biggest threats to their sheep are from coyotes, eagles and hawks. In the past three years, the Lemondes have only lost one lamb to an eagle. Occasionally, coyotes have gotten into the pastured fields, but the dogs have chased them off, even causing one of the coyotes to drop a lamb that was in its mouth.
31. Mr. Lemondes further stated that the family pet, a Mountain Kur, has warned them when something is amiss outside of the home. One evening he barked to warn the Lemondes that something unusual was happening. Mr. Lemondes walked to a pasture next to the barn and the dog found three lambs that had escaped their enclosure. Mr. Lemondes believes that if the lambs had not been found that night, they would not have been alive the following morning.

¹ USDA Animal and Plant Health Inspection Service. 2015. *Sheep and Lamb Predator and Nonpredator Death Loss in the United States, September 2015*. USDA-APHIS-VS-CEAH-NAHMS Fort Collins, CO. No 721.0915.

32. Mr. Lemondes stated that when the dogs bark at night, he goes out to the pastures to investigate. He said that at times, when he investigates the situation, it is the dogs from neighboring properties that are barking, not their dogs. Mr. Lemondes stated that when the dogs sense a threat, he generally moves the sheep into the barn. Furthermore, when the sheep are moved to a new pasture, the dogs walk the perimeter of the pasture to see what they have to guard. Mr. Lemondes stated that his dogs are very good at assessing their surroundings and they move to a vantage point where they can easily observe their wards.
33. Mr. Lemondes stated that on numerous occasions, family members have observed coyotes standing outside the perimeter of the fence. The coyotes appear to be observing the sheep and the family. They have also encountered coyotes when walking along farm roads on the property.
34. On July 27, 2017 Dr. Somers spoke with Ken Johnson, Dog Control Officer for the Town of LaFayette. He stated that he has been a Dog Control Officer for 10 to 12 years. Mr. Johnson stated that he receives calls on a weekly basis about fox and coyotes killing and/or attacking livestock (predominantly chickens) and pets.
35. Mr. Johnson also stated that he has received numerous calls from a neighbor concerning barking from the Lemondes' dogs. He has been out to their property many times in response to these complaints. Mr. Johnson stated that he has visited the area during the day and at night, both on the farm and off the farm, and most of the time, has not heard the livestock guardian dogs bark. Occasionally, he has heard the dogs barking, but during those events, many of the other dogs in the area were also barking. Mr. Johnson stated that there is a large fox and coyote population in the area. He indicated that he is a hunter and has harvested over 100 coyotes in that area. He said that coyotes are very territorial and the Department of Environmental Conservation informed him that if the coyote population is reduced in an area due to hunting, others rapidly move into the area due to reduced competition. Mr. Johnson stated that he has not cited the Lemondes for a violation of local law because they have not violated any local laws. He further indicated that John Lemondes told him that they want to be in compliance with local laws and be friendly with their neighbors. Mr. Lemondes stated that he is open to any suggestions that Mr. Johnson may have concerning this issue.
36. The Department of Environmental Conservation's web site ("Coyote Conflicts") states that coyotes are an integral part of our ecosystems in New York. DEC states that conflicts with livestock occur in the State. Most of the problems involve sheep or free ranging chickens and ducks. Proper husbandry techniques help minimize depredation. (<http://www.dec.ny.gov/animals/6971.html>)

37. Dr. Robert E. Chambers, Professor Emeritus, Department of Environmental and Forest Biology, SUNY-ESF, in an article entitled *The Coyote in New York State*, states that coyotes are well established in New York and it is estimated that 20,000 to 30,000 animals live within the State. According to Dr. Chambers, "[c]oyotes can be a significant problem to individual sheep-raisers." He states that farmers should realize that they pose a threat to their livestock and should utilize a combination of guard dogs, fencing, and pasture management to minimize predation. (Environmental Information Series, *The Coyote in New York State*, rev. 2006; <http://www.esf.edu/pubprog/brochure/coyote/coyote.htm>)
38. Agriculture and Markets Law §308(1) requires that the Commissioner consider whether an agricultural practice is conducted by a farm owner or operator as part of his or her participation in the Agricultural Environmental Management (AEM) Program as set forth in Agriculture and Markets Law Article 11-A. Mark Burger, Manager of the Onondaga County Soil and Water Conservation District, stated that the farm is not a participant in AEM. However, the agricultural practice of using a livestock guardian dog to protect a flock of sheep from predation is not a water quality concern which would be evaluated under AEM. The farm is, however, a participant in the NYSSGHAP and has a Nutrient Management Plan that is part of the farm's participation in Federal Programs administered by USDA NRCS.

Findings

Based upon the facts, information and circumstances described above, and in consultation with the Advisory Council on Agriculture, the New York State Department of Environmental Conservation, the USDA Natural Resources Conservation Service, and the Sound Agricultural Practice Guidelines² by which agricultural practices are evaluated, I find the following:

1. The Department has found no evidence or received other information indicating that the Lemondes are in violation of federal, state or local law resulting from the use of livestock guardian dogs to protect their livestock from predation.
2. The Department has found no evidence that the use of livestock guardian dogs has resulted in bodily harm or property damage off the site. However, there were several

² On November 1, 1993 the NYS Advisory Council on Agriculture published its report entitled *Protecting the Right of New York Farmers to Engage in Sound Agricultural Practices*. The Council developed guidelines to assist the Commissioner of the Department of Agriculture and Markets in determining what is sound pursuant to Section 308 of the Agriculture and Markets Law. The Guidelines state that the practice 1) should be legal; 2) should not cause bodily harm or property damage off the farm; 3) should achieve the results intended in a reasonable and supportable way; and 4) should be necessary. The sound agricultural practices guidelines recommended by the Advisory Council on Agriculture are given significant weight in assessing agricultural practices.

reports from one of the neighbors that the Mountain Kur was aggressive to other people and animals. All farm animals, including dogs, should be kept on the farm.

3. The use of Great Pyrenees livestock guardian dogs for the protection of livestock from predation has achieved the intended result in a reasonable and supportable way. The use of the Great Pyrenees dogs is very efficacious in this case since only one lamb has been lost to predation in an area where the predator population is abundant. Protection of sheep in remote pastures and when the landowner is away from the farm would not be possible without the use and presence of livestock guardian dogs.
4. Information received by the Department indicates that coyotes are in the vicinity of the property owned by the Lemondes along Eager Road in Jamesville, New York. Protection from predation is necessary because sheep have no way of protecting themselves. One neighbor reported that when the sheep and dogs are located in the pasture closest to Eager Road, the dogs' barking was louder and more frequent since they barked at people walking along the road. The Department considers that farmers should be afforded full use of their property for agricultural purposes. The Lemondes' use of the pasture in the winter months to provide access to shelter for the sheep and its proximity to their residence where the sheep can receive proper care during inclement weather and during lambing, is a necessary and essential practice on the farm. A combination of good fencing, the presence of guardian livestock dogs and pasture management is necessary to protect sheep from predation. All three of these management practices are necessary and utilized by the Lemondes for livestock protection. Furthermore, livestock guardian dogs have been used for centuries to protect livestock because the dogs instinctively bark to ward off potential predators and aggressively defend their wards from dangerous situations.

Conclusion

Based on the information and findings set forth above and in accordance with Section 308 of the Agriculture and Markets Law, I conclude that, from a noise perspective, the use of Great Pyrenees livestock guardian dogs to protect sheep on land owned by John and Martha Lemondes, with an address of 3390 Eager Road, Jamesville, New York, as described above, is sound.

9/20/17
Date



Richard A. Ball
RICHARD A. BALL
Commissioner of Agriculture and
Markets