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Bella Vista Training & Care Center

***730 Mt. Airy Road
Lewisberry, PA 17339
(717) 432-0750***

January 3, 2007

Bureau of Dog Law Enforcement
Attn: Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408

Dear Ms. Bender:

As owners of a small licensed boarding kennel (10 dog limit) and dog training facility, we wish to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. Our kennel and training centers are located at 730 Mt. Airy Road, in Lewisberry, Pennsylvania. As long-term residents of Pennsylvania, we have chosen to make our home and run our businesses in Warrington Township. We wish to continue these activities into the future however; the changes in the dog law regulations have us greatly concerned. Please be advised that we strongly believe that inhumane treatment of dogs and substandard kennel conditions must never be tolerated.

After reviewing the proposed regulatory changes, we believe that many of the requirements are not necessary and would not have a beneficial outcome if adopted. Many of the proposed changes are not practical, excessively burdensome and unenforceable. In our opinions many of the proposed changes will not improve the quality of life for the dogs in kennels and would place an undue hardship on small business owners like ourselves and other dog fanciers.

The following is the list of our concerns with the proposed amendments to the dog law:

- The regulations will require extensive renovation, if not rebuilding, of many kennels (including significant changes to our kennel that was just completed in 2006 and exceeds the current requirements) already in compliance with current federal and/or state standards. There is no scientific foundation for the detailed standards that are specified.
- The definition of "temporary housing" would require thousands of small residential hobby and show-breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate. As a result, puppy mills will flourish and the overall health and quality of dogs available will significantly suffer. Pennsylvania needs to support responsible dog breeding practices and these changes would have the opposite effect on the breeding practices.

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- There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law and who provide care and conditions far superior to those required by the proposed new standards, would be unable to comply with the rigid commercial kennel standards.
- The record keeping requirements for exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose in the care of the canines. In addition, it would be impossible to verify the accuracy of most of these requirements except in situations where violations currently exist. In most cases, there would be paperwork compliance. This in reality takes time away from the actual care and interaction with the canines.
- The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The cited list of the deficiencies with the proposed regulations is far from complete. Please be advised that we associate ourselves with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs. To be a responsible kennel owner/operator, individuals need to have a respect for the animals. Pennsylvania cannot legislate a conscience for individuals who lack this fundamental character trait.

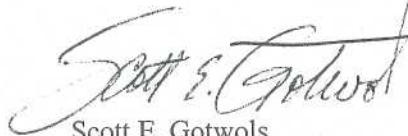
If these changes are enacted, the amount of staff time required to care for animals will greatly increase. This will increase the cost of boarding a dog. As a result, individuals may choose to go with less supervised options for vacations and other short-term boarding needs. Dogs may be left in unsafe situations with unqualified persons placing both the dogs and public at risk. Small boarding businesses like ours will financially suffer from these changes. We respectfully urge that this proposal be withdrawn.

Please feel free to contact us at 717-432-0750 with any questions regarding this matter. Emails can be addressed to bwwestie@ptd.net. Thank you for attention.

Sincerely



Stephanie Capkovic



Scott E. Gotwols

Cc: Patricia H. Vance
Beverly Mackereth
Pennsylvania Federation of Dog Clubs