

2559

RECEIVED
DOG LAW ENFORCEMENT

RECEIVED

JAN 3 2007

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

2007 JAN -6 AM 10:23

INDEPENDENT REGULATORY
REVIEW COMMISSION



Dear Ms. Bender:

Let me first introduce myself, my name is Sheryl Eckenrode I live in a rural community just outside of Slippery Rock, I have a small hobby horse farm. I breed and train Quarter horses, Paints and I also breed and raise Australian Shepherds. I only breed once or twice a year as my dogs are also my pets. My male dog is currently in training to become a search and rescue dog. I was recently made aware of some outrageous proposals made by our state government that would change my ability to raise and care for my pets in a home setting.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

Examples of problems with the proposal are the following:

- * 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.
- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements. Not allowing a dog to run on grass. Is no consideration given to the fact that dogs with arthritic conditions do not do well when housed on concrete flooring? Would you as a human want to stand on concrete for the rest of your life?
- * The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- * Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, 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. My puppies are loved and cuddled and socialized with people and other pets from the beginning of their lives the new proposals would make me have to keep my puppies away from the family. Me and my children and our pets are our family.
- * The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.
- * The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. I have in my home currently six, I have an malamute/husky mix who weighs in at 135 lbs, two Australian shepherds one weighing in at 55 lbs the other at 40 lbs, a German shepherd who weighs in at 65 lbs, a lab puppy that belongs to my son who is living with me as he just returned

from Iraq, his pup weighs in at 55 lbs, we also have a terrier mix that weighs in at 65 lbs. This dogs play together and romp together on my five acres and they would not do well if they had to be confined to kennels or left on a chain for hours.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has no connection to specific instances in which the welfare of dogs could not be secured and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,

Mrs. Sheryl Eckenrode
96 Pipestem Road
Slippery Rock, PA 16057

A handwritten signature in cursive script that reads "Mrs. Sheryl Eckenrode". The signature is written in dark ink and is positioned below the typed name and address.