

2559

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 JAN 18 PM 4:10

RECEIVED

January 15, 2007

Independent Regulatory Review Commission
333 Market St, 14th Floor
Harrisburg, PA 17101

RE: Proposed Amendments to Dog Law Regulations

To Whom It May Concern:

The recently published proposals to amend the regulations pertaining to the Dog Law are so Byzantine that they should be scrapped in toto.

These proposals represent an over reaction to a problem that can be handled with the regulatory tools now at hand. If the Bureau of Dog Law simply put politics aside and enforced its existing regulations, the kennels which are the obvious targets of all this rule making and forced expenditures by kennel operators (non-profit as well as profit) would be put out of business or made to comply with these existing common sense regulations.

Instead, we now face a proposal that will cost far in excess of the "\$5,000 to \$20,000 per existing kennel" estimated in the proposed rule making. Many shelters would be forced to rebuild their structures, literally from the ground up, as few shelters have six-inch drains in place and new HVAC systems would have to be retrofitted to meet the air handling requirements. In many situations the kennels themselves will have to be replaced. Costs will be measured in six figures.

And, it appears from the proposals, for every kennel attendant handling dogs another person would have to be hired just to record every action (feeding, watering, walking, etc.) taken by that attendant. This is bureaucracy run amok.

As far as fostering dogs is concerned, these regulations kill what for many organizations is an absolutely necessary resource. Few, if any, private homeowners are going to want to upgrade to what the regulations call for and then subject themselves to government oversight. Without the ability to move puppies into foster homes for temporary care, many non-profit organizations will have no recourse but to euthanize those puppies too young for adoption or too numerous for the facility to handle.

There are many other specific problems with these proposals, but rather than spend more time enumerating them, I simply suggest that it's time to go back to the drawing board.

Cordially,

Erik Hendricks
Executive Director

Kathy Cooper

From: Erik Hendricks [ehendricks@pspca.org]
Sent: Monday, January 15, 2007 5:05 PM
To: IRRC
Cc: Anne Irwin; Mary Bender
Subject: Dog Law Rules Proposals



Dog Law Rules
Proposal Respons...

The attached commentary on the proposed Dog Law rules amendments by the Dept. of Agriculture has also been sent to the IRRC via regular mail.

Erik Hendricks
Executive Director
Pennsylvania SPCA