



THE PENNSYLVANIA SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS

(Founded June 21, 1867 - Incorporated April 4, 1868)

350 EAST ERIE AVENUE, PHILADELPHIA, PENNA. 19134

(215) 426-6300

2559

FAX (215) 426-5848

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Erik Hendricks

EXECUTIVE DIRECTOR-SECRETARY

Direct Line: (215) 426-6555

— BRANCHES —

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

MARION S. SIEMENS SHELTER
11765 ROUTE 6
WELLSBORO 16901
(570) 724-3687

CENTRAL COUNTIES BRANCH
2451 GENERAL POTTER HWY.
CENTRE HALL 16828
(814) 364-1725

TOWNSEND MEMORIAL SHELTER
2801 BLOOM ROAD
DANVILLE 17821
(570) 275-0340

MONROE COUNTY BRANCH
RR 1, BOX 1237
STROUDSBURG 18360
(570) 421-6761

CLARION COUNTY
HUMANE SOCIETY
9562 ROUTE 322
SHIPPENVILLE 16254
(814) 226-9192

SUSQUEHANNA COUNTY
HUMANE SOCIETY
ROUTES 706 & 29
(ON THE LAKE)
MONTROSE 18801
(570) 278-1228