

2509

Bureau of Dog Law Enforcement
Attn: Ms Mary Bender
Pa. Dept. of Agriculture
2301 North Cameron St.
Harrisburg, Pa. 17110-9408

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Dear Ms. Bender,

My name is Cheryl Hamre; I live at 3011 Naamans Creek Road Boothwyn, Pa. 19061. I am the owner of six dogs, four which are neutered and family pets. Two of my dogs I intend to breed as show quality Saint Bernards. I am active in my community with rescue and donate regularly to the ASPCA. I consider myself a hobbyist. My dogs are all licensed, vetted and well cared for.

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 wouldn't 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.

There is no scientific or accepted husbandry basis for the amended space and exercise requirements. Smaller breeders and dog owners such as myself 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. The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

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 its 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 secured, and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely yours,