

155 Edgemont Ave.
Palmerton, PA 18071

January 18, 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:

I am writing to comment on the proposed changes to the Pennsylvania dog laws and regulations that were announced on December 16, 2006. As a lifelong Pennsylvania resident and dog lover, I applaud efforts to improve substandard kennel conditions and clean up "puppy mills". However, many of these proposals are unworkable and would have precisely the opposite effect. The small scale residential hobby-show breeders (who are working to maintain and improve the quality of dogs) would be forced to shut down, and the large scale commercial puppy mills would be the only remaining source of dogs and puppies.

Under the "26 dog rule" anyone who has a few dogs, and a lot of friends who visit with their dogs, may be required to get a kennel license and have his home subject to inspection/invasion by dog wardens. The small scale show/hobby breeder who breeds 2 or 3 litters a year in his/her home would likewise be required to meet the same proposed commercial requirements. The "sterile warehouse" environment called for in the proposals appears to be designed for a very large scale commercial operation and is not appropriate or desirable for a small scale or residential operation. These dogs are companion animals, not laboratory specimens. Many of these proposals are actually bad for the psychological and social development of dogs, and conflict with accepted canine development standards. Other of the proposals, while they may not actually harm the dogs, impose additional requirements or even hardships on the dog owners without doing anything positive for the dogs. Some examples:

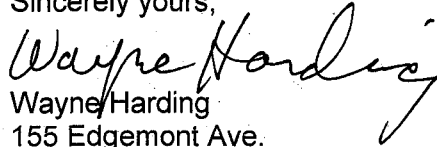
- Most people who house their dogs in their home do not have sloping floors and floor drains in their home. There is no good reason why they should.
- The record keeping requirements are excessive to the point of being punitive and do nothing to improve the lives of the dogs. Time spent on this "busy work" is time that cannot be spent on the care of the dogs.
- The current space standard is a good one. It is consistent with a dog's need for a cozy "den". There is no good reason to double the space requirement.
- Forcing small residential show and hobby breeders to reduce the quality of their dogs' care to that of a large commercial dog warehouse would be contrary to the best interests and well being of the dogs. For most such breeders and dog owners it would be a serious hardship to have to rebuild their homes to meet the same requirements as a large scale commercial kennel. Nor should they. Dogs are social beings, not just merchandise to be warehoused. Many companion breeds need to be with people, and a residential environment is much better for them than a commercial environment.

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There are many other problems with these proposals, but you can see even from this short list that the problems with the proposed regulations are serious. Either this should go back to the drawing board, or it should be abandoned. A simpler and more reasonable approach might be to specify a minimum number of kennel workers for any given size of kennel. (for example, a minimum of one person for every 30 or 40 dogs housed at any one time). This would not only enable and encourage better care and conditions in large establishments; it would also improve the dogs' social development. And it would do so without micro-managing the details of the physical facility through arbitrary regulation.

Sincerely yours,



Wayne Harding
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Palmerton, PA 18071

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Cc: Senator James J. Rhoades
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