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PA DEPT OF AGRICULTURE  
BUREAU OF DOG LAW ENFORCEMENT  
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ATTN: MARY BENDER

Dear Pa Dept of Agriculture:

I am a dog owner, have been for 60 years. While there are some good points in the new 36PA.B.7596 it appears this sets up a set of rules which will be impossible to adhere to & highly costly to implement with an existing kennel.

I have personally visited several kennels during the past year and I find these folks all have the best interest of the dogs in mind. While some are not the modern facility as is set forth in the Bulletin, all the dogs had water, their bowls were adequately clean, their runs were clean, the dogs were cared for healthy & happy, nails trimmed, their coats are clean.

From a common sense approach it would therefore make sense to *grandfather* these existing facilities. If they were issued a kennel license they certainly met the criteria as set forth at that time. They are not puppy mills which is something Pennsylvania needs to be concerned about, however we should not throw the baby out with the bath water. These facilities additionally provide a refuge for humans who change their minds about having a pet, leaving them along roadsides, elsewhere unattended and/or mistreated. We all know of companion animals that have become homeless due to the owner's passing. Many of these dogs are given a second chance to have a decent life with a new owner.

I personally have two rescue dogs. Both are lovely. I've been commended what a good job I did with these two. I really haven't done anything but to give them a good home. They have both responded very well. We attended a few dog school classes, they go swimming, walking - we were pictured in the local paper, we did a couple of holiday parades, we did several events wherein they have won ribbons. One has her CGC & Herding certificates. Had a small facility not taken these two dogs in they may have been put down. In a case such as this I certainly would not enjoy the companionship and fun they have provided.

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## HOUSING REQUIREMENTS:

Certainly any responsible pet owner or breeder would strive to maintain decent quarters if for no other reason than to avoid sickness. After all it is their livelihood & vet bills are astronomical.

Your requirements set forth no puddles, drainage, temperature/s EVEN during inclement weather conditions I would seriously question. A small run 4' x 6' run would obviously not present the upgrade problem a 12 x 30 run would. In these larger runs a dog can move to another part of the run, dog house, etc., to avoid something such as a puddle or to find a cooler or warmer spot, I truthfully see no harm done. I have found a dog housed outdoors are healthier dogs than a house dog. Their coats are better, they enjoy the outdoors which is after all their natural habitat. We all realize there are hurricanes, heavy rains, snow, freeze & thawing which all can create muddy conditions.

I once had one who would parade incessantly until he made a mud trail and certainly he got muddy. Yes, he a small dog, alone would have stomped through 8" of gravel which would have destroyed his feet. I had one who enjoyed sitting out in the rain, ice & snow. I have had the reverse wherein they didn't want to go off the porch when it rains. I would be opposed to stoned runs as I had a boy who had tender feet. He always ouches about walking on stone paths. Concrete while smooth surface is easier to clean, keep clean, squeegee it is also slippery and a dog jumping around can slip & fall. If it's rough coat concrete then it's more difficult to remove stains as they sink into the tiny depressions. We all know wind does blow rain, it comes in on my porch as well as snow. Concrete confinement can cause rubs from dogs being on such a hard surface not to mention bloody feet from natural exuberance. For an arthritic animal (young or old) a hard surface would not be my first choice.

Maintaining 85 degrees in the summer unless there is air condition would be a real feat. Certainly we have all seen the private dog owner tie a husky to a dog house in the blazing sun with only the shade of a dog house, no common sense but I know of no responsible pet owner and certainly not a breeder who would subject his/her animals to such a sin.

Lighting section 21.27 item 2 - is yet another situation. Many insects such as mosquitoes are drawn to light, they do get in even with screens in place. Many dog owners such as myself do not wish to inoculate their pets for fear of setting forth a situation of "over medication" which seemingly is creating a host of other medical conditions in this day and age. If one has ever completed a Degenerative Myelopathy questionnaire one can readily read between the lines for the possible cause.

Citing a kennel for these requirements is incomprehensible. It would therefore seem there are ample laws already in place to be administered. Therefore I oppose these criteria's as set forth.

## DRAINAGE

There is quite a bit of expense involved with this for an existing kennel. Existing concrete would have to be broken up probably to the degree it would be cost effective to remove the fencing & start over as the gates would additionally have to be reset.

The requirement with regard to clean bedding. Wow - this seems a daily trip to a laundry is inevitable. A lot of these dogs sleep on heavy blankets and/or rugs. Certainly they do get dirty & should be changed but is a DAILY requirement appropriate or necessary?

Listed as shade constructed as a permanent fixture. I take this to mean a structure with the ability to support ice, snow & wind, otherwise it will come crashing down. What would be classified as a permanent structure is a costly undertaking in large runs. I haven't read there is a height requirement for a human to enter it.

## 25 DOG AND LICENSE REQUIREMENT

Many of these kennels have visitor dogs (boarded for weekends, a week at a time, etc.) When a dog carries a license from another owner does this dog count in the accumulative total of those housed in any one facility? While I may not understand the criteria as set forth, puppies under 3 months do they count in the accumulative total? Some of these dogs might be rescue dogs, some are boarded. Perhaps I could suggest better terminology, much like a movie theater, a hotel or a night club wherein the requirement isn't accumulative but exists on the number at the facility at any one time as dogs come & go.

## EXERCISE

Dogs of various sizes and weights co-exist in private homes. I have a friend who has a Great Pyrenees, a Samoyed, a Bearded collie. I know of a situation wherein there are an assortment of dogs co-existing together anywhere from Shelties to Bouvier. I know of another who has several mix breeds ranging in size from a large Shepherd to a Jack Russell. I know of instances wherein a Great Dane and a Dachshund live in the same home. If these dogs were sent to a boarding kennel, I believe your requirement would be to separate them. We exercise a gang of 6 together, they romp & play and take 4 mile walks. If you've even been to dog training classes they promote socialization amongst the sizes.

This requirement as set forth seems without reason.

## RECORD KEEPING -

Sounds like a full time job for 10 people to care for 26 dogs. I really don't know how a breeder does it. Recording the bedding, sanitizing of the kennels, the bowls, grooming, exercise, food, water, etc. plus the time involved. Naturally there are vet visits. Grounds maintenance, today one would be shoveling snow. There's no time left to cuddle not to mention lunch break or a cup of coffee. Hope the phone doesn't ring, there aren't enough hands to answer it.

## In CLOSING

Thanking you in advance for allowing me to submit thoughts of a pet owner. I've covered some. While I really have limited knowledge how a kennel operates, the ones I have visited all have had the dogs priority one. It would be a shame to eliminate these older existing kennels which is what I fear will happen should these requirements become law. It sets forth a feat nearly impossible for them to attain, will be extremely costly for them to implement if affordable at all. This will mean more dogs will be sacrificed.

I do commend you for actions if the intent is directed against the puppy mills. Certainly I haven't seen what an inspector may have but there are existing laws to be enforced/enacted against those violators. Perfect worlds are difficult to attain. I can see how a new establishment could incorporate your plans into their building process but a kennel in existence for years, breeds wonderful healthy dogs, are AKC; these certainly should be permitted to continue to operate as they have provide an unprecedented public service to the community for many years. They really deserve a pat on the back rather than a kick in the butt.

Respectfully submitted

Shelby Geisler