

January 21, 2007

Pennsylvania Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Ms Mary Bender
2301 North Cameron St
Harrisburg PA 17110-9408

Dear Ms. Bender:

My name is David Creighton, I live in Lancaster County, have several family pets and have become very concerned about the way dogs are raised in Pennsylvania. I am very active in United Against Puppy Mills, but the following comments are my personal comments, however I am sure they are shared by many others.

I would like to thank Governor Rendell and the Bureau of Dog Laws for your diligent efforts in proposing new and amended kennel regulations. I fully support the changes that are proposed as they will improve the health and welfare of all dogs bred within the state.

First, in the past two years I have had the opportunity to study in depth ten or more township zoning laws from the Lancaster County area. First, they typically say very little specific about dog kennels except that the kennel operators must follow the Pennsylvania Dog Laws. Many of the Township Zoning Officers have very little knowledge about the Pennsylvania Dog Laws and feel that enforcement is the states responsibility. Second, they do have specific guidelines about buildings, drainage, sewage, and environmental issues. Many of the Township Zoning Officers may have experience and knowledge in the construction areas but they do not understand the environmental impact that large kennels can have on the local environment. Third, I am aware of the Zoning compliance question on the 2007 Kennel Licenses Application, but presently there is no way of validating the answer to that question.

Because each township in Pennsylvania has slightly different local rules depending on their environment, it would be very difficult to train the Dog Law Enforcement Officers to be proficient on all these laws. However, the Local Zoning official would be best suited to be sure that all structural, sewer, electrical, fire, drainage laws are adhered to and provide a safe environment for dogs to be housed. For that reason I would like to see an addition to Section 21.14 similar to the wording below. An added advantage to this would be that the local zoning board would be responsible to verify that the affected drainage and water run off from the area would be handled properly and not adversely affect the water sources for the community.

INDEPENDENT REGULATORY
TRAVEL COMMISSION

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21.14 Kennel Licensure Provisions;

A requirement should be added to this section requiring any person applying for a new or renewal license for a Class I, Class II, Class III, Class IV, or Class V Kennel, Boarding Kennel Class I, Class II, Class III, or a Non Profit Kennel to show proof of the Local Zoning Board approval for the Kennel building or buildings and all related structures before being issued a new or renewal of a yearly kennel license.

21.24 Shelters, Housing Facilities and Primary Enclosures

Second, I am very concerned with the wording in Section 21.24 (b) *Outdoor housing facilities*. I believe it should be more specific as to breed of dogs that can be allowed or disallowed, so as to leave no question as to breed of dog allowed. There would be no effective way that a range of 50 to 85 degree Fahrenheit could be maintained at all times.

21.25 Temperature Control

Section 21.25 Temperature Control (b), (e), (e1), and (e2) should also contain the same specific dogs as Section 21.24. I am making these recommendations for Sections 21.24 and 21.25 based on eight years of my professional career in the field of Heating, Air Conditioning and Ventilation System Design.

Kennels – Records


21.41 General requirements

I would like to recommend an additional requirement that all dogs over six months of age that are kept at a kennel facility be required to be microchip. This would provide positive identification to all dogs for transfer purpose, retrieval of lost dogs, as well as identification of any abused or wrongfully disposed of dogs. It would be advantageous to all parties.

The passage of these kennel regulations will also make Pennsylvania's Department of Agriculture a national leader and diminish Pennsylvania's reputation as "Puppy Mill Capital of the East Coast."

Once again, I support and encourage the proposed kennel regulations!

Sincerely,


David J Creighton
667 North School Lane
Lancaster, Pa. 17603