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INDEPENDENT REGULATORY
REVIEW COMMISSION

1/30/07

Mary Bender, Director, Bureau of Dog Law Enforcement
2301 N. Cameron St., Rm. 102
Harrisburg, PA 17110

Re: Proposed Rulemaking for Dog Law Enforcement

Dear Ms. Bender,

Speaking from the stand-point of the Executive Director of the Cumberland Valley Animal Shelter, I certainly welcome changes to Dog Law that will better the treatment of confined dogs and strengthen the abilities of Dog Law Enforcement Officers to impose regulations. I have evaluated the proposed changes and/or additions to the Dog Law and am submitting my comments for review.

I suggest the following revisions be made so that non-profit animal shelters and rescue groups can continue to do their good work and serve the animals and community they live in:

- 1) Section 21.4 (Regarding the Seizure of animals) – this section should clearly state how long an Animal Shelter would have to hold seized animals. The concern of shelter space and resources should be considered since most shelters are already beyond capacity and realistically can not “hold” animals for unknown lengths of time.
- 2) Section 21.21 (Regarding dog quarters) – the costs associated with drastic renovations, due to the requirements contained in this section, could devastate a non-profit animal organization. I can only speak for the Cumberland Valley Animal Shelter in that we keep our kennels extremely clean and are constantly striving to prevent disease transmission, as many shelters do all over Pennsylvania. Since these new regulations are geared mainly toward big business “Puppy Mills”, non-profit animal shelters should be exempt from such regulations, so that they can continue helping thousands of stray, abandoned, and/or abused animals.

This section also addresses exercise requirements for dogs. I noticed that the proposed regulation does not state whether an exercise area should be of a certain minimum size. It does, however, address a time period, that each dog must get exercise, of 20 minutes. I do agree that dogs need exercise and socialization and applaud this rule, but as pertaining to shelter dogs in isolation or quarantine, it

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seems unrealistic to follow. Exercising dogs that should not be handled due to potential disease or aggression issues, not only jeopardizes the staff handling them, but also endangers the health and welfare of the other dogs in the kennel.

I noticed that there are no new regulations that apply to dog owners with less than 26 animals and I feel there should be stricter laws regarding tethering dogs. Several states have passed anti-chaining or anti-tethering laws to prohibit dogs from being tied out for 24 hours each day. Please consider addressing chaining/tethering laws, so that no dog in PA has to live tied-out to a box.

Respectfully Submitted,

Jamie Caldwell
Executive Director of the Cumberland Valley Animal Shelter