



**HUMANE LEAGUE**  
OF LANCASTER COUNTY

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January 31, 2007

Mary Bender, Director  
Bureau of Dog Law Enforcement  
Department of Agriculture  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

RECEIVED  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Mary,

Thank you for the opportunity to comment on the proposed dog law regulations. As the president/CEO of a Humane League, I appreciate the department's initiative to address gaps and tighten accountability on behalf of the animals we all serve.

Overall, I have a concern about attempting to develop one comprehensive set of regulations for all kinds of establishments. For example, as a temporary shelter for lost, stray and abandoned animals we have a very different mission and set of challenges than a large breeding facility. In addition, we are distinct as a 501 (C) 3 non-profit which is of course vastly different from a for-profit retail operation. While the for-profit establishments have "gains" which can be re-invested into their "businesses", we do not. Rather, we survive largely on donations from our community, with which we are bound by our mission to provide the best care possible.

Specifically, I offer the following comments on the proposed regulations:

#### 21.14 Kennel Licensure Provisions.

We have a concern about requiring a kennel license for any establishment with a cumulative total of 26 dogs in one calendar year. With over 100 foster homes we are able to rehabilitate and save hundreds of dogs every year. However, if a foster home takes several litters of puppies with mothers, plus other adult dogs during the year, this could put them past the limit. Clearly, requiring a license and inspections for these foster homes would present quite an obstacle.

Question: Will computer data be acceptable as kennel records? Our shelter software contains all of the required information and is kept in our database well beyond two years.

#### 21.22 Housing

Requiring us to quarantine puppies for 14 days presents a hardship for us and potentially the puppies themselves. We do not always have the space for quarantine and we believe strongly in the importance of socializing puppies. Many of ours go into foster homes.

### 21.23 Space

Required exercise per day is wonderful, given the dog is not dangerous or carrying a contagious disease. Also, on days when we are closed to the public we do not always have adequate staff to exercise every dog, especially since we rely heavily on volunteers.

We suggest that outdoor runs and exercise areas might well be grass or natural substances, not just concrete, gravel or stone, as long as the primary material is not dirt/mud.

### 21.24 Shelter(s), housing facilities and primary enclosures

Can we please stipulate that dogs have at least a solid surface on which to stand and lie down (no screen/mesh) ?

### 21.26 Ventilation in (indoor) housing facilities.

Older shelters may have trouble meeting the requirements of six air changes per hour and adequate ground level ventilation. Perhaps shelters could be "grandfathered" in and some of these regulations could apply to construction of new shelters.

### Kennels- Records

Records are a necessary part of accountability, however, excessive paperwork which can be easily fabricated will only place an undue burden on shelters in terms of staff time, training and resources. For example, noting the time and detail of daily feedings plus daily changing of water for each dog seems excessive when simple observation would indicate whether animals appear to be underfed or dehydrated.

Again, thank you for your efforts in addressing the many concerns and issues regarding the care and breeding of dogs in the Commonwealth.

Sincerely,

  
Joan E. Brown  
President/CEO