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January 31, 2007

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Bender:

My name is Lisa McKinney and I am a multi-dog owner in central Pennsylvania. My reason for contacting you is to express my opinion regarding the proposed amendments to the Pennsylvania dog regulations issued on December 16, 2006.

Inhumane and substandard kennel conditions should never be tolerated. That said, I do not believe that most of the proposed regulatory changes are needed, nor would they have a positive impact on the lives of dogs. Several are impractical and overly burdensome, many are not reasonably enforceable.

Below are some examples of the problems I feel exist with the proposal:

- The definition of "temporary housing" would require thousands of small hobby and show breeding households to become licensed. These small operations could not possibly comply with the regulations. In addition, these small breeding programs are not the source of the issues the proposals are attempting to address.
- There is no accepted basis for the amended space and exercise requirements.
- The regulations will require major renovations, if not complete rebuilding, of many kennels. These kennels are already built in compliance with current federal and/or state standards. There is no scientific foundation for the engineering standards specified.
- Breeders and multi-dog owners who maintain their dogs in their own home, but are covered by the Pennsylvania dog law, and who currently provide conditions far superior to those required by the proposed standards, would be unable to reasonably comply with the rigid commercial kennel standards.
- The record keeping requirements with respect to exercise, cleaning, and other aspects of kennel management are excessively burdensome. They serve no useful purpose and it would be impossible to verify their accuracy in all but the most egregious circumstances. Such blatant disregard for care already violates existing regulations.

The above is far from a complete list of the issues with the proposed regulations. The more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs should be given heavy weight when considering these proposals.

The Bureau has implied that its current regulations have not been adequately enforced. They have also announced an enhanced enforcement program. If the Bureau then finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, they should cite these specific weaknesses and propose changes based on them. The current proposal appears to be a list of ideas that have no connection to specific instances in which the welfare of dogs could not be secured, and no basis in science or accepted canine husbandry practices. I urge that this proposal be withdrawn.

Sincerely,



Lisa R. McKinney
22 Lilac Drive
Mechanicsburg, PA 1705

cc: Senator Patricia Vance
Representative Glen Grell