

**Willorill Kennels  
114 Stitzer Road  
Fleetwood, Pa. 19522  
610-944-7125**

**2559**

To: Independent Regulatory Review Commission,

Re: Proposed changes to Pa. dog law Act 225

Dear Chairman Coccodrilli,

My Name is Eric S. Fox owner of Willorill Kennels in Fleetwood, Pa. I am writing in reference to the proposed amendments to the Dog Law Act 225, which were issued on December 16, 2006.

My first objection is that the public comment period is not long enough considering the fact the new advisory board that was formed only has met one time since it's inception. Also will all boarding kennels be notified of the advisory boards next meeting so we are able to attend and voice our opinions?

Before any changes are made I think further distinction needs to be made between boarding kennels, reputable breeding kennels, and intensive animal operations otherwise know as "puppy mills. If the Governor wants to create legislation regulating puppy mills wouldn't it be easier if they were categorized by themselves? I realize that there are separate and different licenses required for boarding kennels and breeding kennels now, but as I stated further distinctions need to be made whether it be by changing the numbers bred and sold by individuals in a year's time or some other manner. Right now as the law reads anyone who keeps, harbors, boards shelters, etc. 26 or more dogs in a years time is going to be bound by these new regulations. It is time to come up with better wording in this section. I realize the 26 or more number has been in the regulations for years, but isn't it time to look at a change in this aspect. Breeding boarding, or selling 26 dogs in a years time as compared to breeding or selling thousands of dogs in a years time as the puppy mills do is a whole different ball game. For instance maybe some regulations are needed to limit the number of litters a female can have in her lifetime.

Now on to the rest of the proposed changes: In the general definitions section 21.1 the definition of and establishment needs some work. Why not make your licenses site specific to the actual kennel buildings themselves. There is no reason private residences should be included in these regulations unless you are doing the actual boarding, breeding, etc. in your living quarters.

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In section 21.15 why should dog control facilities be exempt from any of these regulations? Since the dogs are there until they are adopted or put to sleep don't they deserve the same amount of floor space as a dog that is in a kennel for a week while the owners are on vacation? In my opinion shelters, humane societies, and rescue organizations should not be exempt from any regulations that the rest of us must abide by. After all aren't we in this to look out for the welfare of all dogs not just the ones in kennels?

In section 21.23-subsection (b) these changes will be very difficult to conform with and mean major, expensive remodeling will have to be undertaken by all kennels within the commonwealth. As long as the dogs are provided with proper exercise the space regulations should remain the same.

In section 21.23 subsection (e) does an outdoor run that is connected to an indoor run constitute an appropriate exercise area? Also further down in this section there are weight classification for dogs that can be exercised together In my opinion dogs belonging to different owners should never be allowed to exercise together for obvious safety reasons. How many boarding kennel operators are qualified animal behaviorists and are able to safely determine which dogs will or will not be aggressive when introduced to other strange dogs for the first time? In my opinion this section should simply state that dogs belonging to different owners should not be allowed to interact at all. It would save a lot of grief for everyone concerned.

In section 21.24 the entire wording regarding housing dogs in primary outdoor enclosures needs to be looked at. In my opinion no dog should be made to stay outdoors at a boarding, rescue, or breeding establishment in the Commonwealth of Pennsylvania due to the dramatic weather changes that occur in our area. We can go from a sunny 60-degree fall day and within hours the temperature can drop way below freezing. If individual owners want to expose their dogs to these conditions it is up to them. (Even though I do not agree with the practice and firmly stand behind the belief that if you own a dog it should be part of your family and should stay indoors). I thought these regulations were supposed to look after the well being of the dogs.

In section 21.24 subsection (b) (11) regarding pesticide use what veterinarian is an expert on pesticide use. I highly doubt any veterinarian would want to jeopardize his or her reputation by commenting on pesticide use. How about contacting a licensed professional pesticide company representative for this kind of specialized advice??

Also in section 21.24 subsection 11 (ii) why must all floor drains be six inches in diameter? For instance if you have a dog kennel with a capacity for 10

dogs why in the world would you need a six-inch floor drain? The drain size should be determined by the size of the facility and the number of animals that could possibly be housed within not just by throwing out an overall figure of six inches!!! Just in case you are wondering a six- inch pipe could handle approximately 1000 gallons per minute!!!

In section 21.24 subsection 11 (iii) regarding drains between indoor and outdoor runs. If your indoor runs are sloped to drain towards the indoor gutter and drain system and your outdoor runs are sloped to drain toward the outdoor gutter and drain system what is the purpose of a drain between the indoor and out door runs? Does water run up hill in Pennsylvania??

In section 21.24 subsection 12 regarding the storage of medicines etc. a more advisable method of storage of the items mentioned is that they should be stored in a manner that is inaccessible by the dogs in the kennel; for instance in a separate room separated by a door that can be closed when staff members are not present to separate these items from the dogs in case a dog were to escape from a pen in the kennel area. Are there any medicine bottles or food storage containers made today that cannot be destroyed by a dog, since most of these items are made out of plastic these days?

Section 21.25 this section regarding temperature control needs some work!! In my opinion a minimum slab temperature of 35 degrees is way to low especially for older dogs or dogs with hip problems and arthritis. The upper temperature listed at 55 degrees in my opinion is also ridiculous!! What if the kennel is equipped with radiant heat in the floor and they want to keep their slab heated to 70 degrees in the winter are they not allowed to do so?? The ambient temperature requirement of not falling below 50 degrees also needs to be looked in my opinion this is also to low!! When this section was written were any veterinarians contacted regarding these temperatures or did the temperatures listed come from the same source as the six- inch floor drains in all facilities? How about a regulation requiring resting platforms in each kennel run to keep the dogs off of the cold concrete floors?

Section 21.26 regarding ventilation in indoor facilities also needs to be looked at. I believe it is equally important to control humidity in a kennel as well as to regulate airflow. Numbers were found for all other aspects why not humidity level below 50 percent? It has been proven that if a humidity level is maintained below 50 percent that the viruses that cause bordetella as well as mold spores and allergens are not able to survive and multiply thus producing a healthier environment within the kennel. Keeping the humidity below 50 percent also ensures that the floors dry quicker after cleaning and the kennel remains virtually odor free. These humidity levels are attainable through the use of commercial

dehumidification equipment. Six air exchanges in one hour may be excessive and create drafts within a smaller facility, this regulation needs to be explored and should leave room for ventilation requirements to be tailored to the size of an individual facility instead of an arbitrary six air exchanges per hour, for instance a larger facility with a full load of boarders in the summertime may require more than six air exchanges per hour.

Section 21.26 subsection (3) regarding ground level ventilation must also be explored. There are more efficient ways to ensure dry floors than requiring ground level ventilation as I stated in the previous paragraph controlling humidity within a kennel will solve most of your moisture related problems. Requiring ground level ventilation if it is installed incorrectly within a facility could do more harm than it does good. Perhaps some input from HVAC technicians and building engineers would be helpful in coming up with some solutions to ventilation problems within boarding kennels.

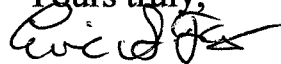
Sections 21.29 subsection (a) regarding disinfectants being approved by licensed veterinarians. Again I ask what qualifies and ensures that any veterinarian knows anything at all regarding the chemical make up of all the disinfectants that are on the market today. If you want qualified opinions on disinfectants wouldn't you seek information from an individual with a background in chemistry?

Section 21.41 the general requirements section regarding record keeping also needs some revisions. If a kennel operator feeds and waters all the dogs within the facility at the same times each day why must times be documented for each individual dog within the facility? For example shouldn't it be sufficient to say that all dogs were feed each day at 6:30 AM and 4:00 PM and their water bowls were checked and refreshed at every exercise period. In my opinion this requirement would be very burdensome upon a sole proprietorship business such as mine where most of the time I am the only one performing the kennel chores.

In conclusion I would like to say that the kennel business that I operate has been in my family for over forty years and I take pride in the way that we have operated our business throughout those forty plus years. We have many repeat customers some of the same customers that my parents had when they started the business still are customers today. I realize that the primary purpose of these proposed amendments is to regulate the so- called puppy mill industry that is growing within the Commonwealth of Pennsylvania.

My suggestion is regulate the puppy mills don't over regulate the reputable establishments. If you over regulate businesses such as mine you will force us out of business and all you will have left is the intensive animal operations that you are seeking to close because they will likely be the only ones with enough money to make all the ridiculous changes that are suggested in these new regulations.

If you have any questions please feel free to contact me at 610-944-7125 or 610-223-9577 you may also email me at [willorill@msn.com](mailto:willorill@msn.com)

Yours truly,  
  
Eric S. Fox  
Willorill Kennels