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Dept. of Agriculture  
Bureau of Dog Law Enforcement 2007 FEB 28 PM 2:41  
2301 North Cameron Street  
Harrisburg, PA 17110-9408

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Attn: Mary Bender

Proposed Rulemaking

Gentlemen:

PA.CODE CHS 21, 23, 25 & 27

I have read with interest the above suggestions as given in The Pennsylvania BULLETIN. I am writing as an individual although I am very active with the Monroe Animal League in Stroudsburg.


On the whole I believe the suggestions are good. However, I'm concerned about compliance. I didn't see anything about a time-table for completion of necessary changes. Also many facilities may have, for example, a very adequate drainage or ventilating system that produce the results you are after but may not be designed exactly as stated. Shouldn't there be some allowances? Certainly any new construction or remodeling should be up to revised standards but if a system is not broken, why fix it?

Specifically 21.24 Shelters (11)-p6 of 23 Outdoor facilities....free of grass and weeds. Can-not the grass and weeds be sprayed to rid it of ticks/fleas/etc.? Personally, my yard was done about 10 years ago, and I still do not have a problem with these pests on my dogs. I do not use preventatives, i.e., Advantage/Frontline. Dogs love grass, and it is a lot easier on their pads than stones or fabricated materials.

Some of the house/run sizes seem inconsistent. Inside width is one size and outside width is double. A facility can lose enough space to cut their capacity in half. And is it necessary? Boarding kennels usually are set up for short stays. When requesting long stays an owner usually has to make special arrangements and if a kennel cannot accommodate them, they go elsewhere. I believe there is far too great a need for kennel space to have the number of accommodations cut in half without a great deal of cause/effect thinking, and cost evaluation to the kennel owner and also to the boarder.

This study cost money and the figures given to impliment the changes sound outrageously high. I can't help but feel that if our present laws were enforced (and enough people were hired to enforce them) there would be a great improvement in kennels and puppy mills could be eliminated. There is a great shortage of Dog Wardens, Humane Officers, and Animal Control Systems. I can't speak for the rest of the State, but this is true for Monroe County and surrounding areas.

Very truly yours,

  
Jo Valentine  
P O. Box 238  
Effort, PA 18330  
(H) 610-681-5386