



HOOSIER ROOS BERNESE

Rob A. Smith
Jeannie Whitton-Smith

9651 Lancaster-Circleville Rd.
Amanda, OH 43102
(740) 969-4924
hoosierroos@gmail.com

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

We respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, we would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, we fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, we strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. We commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.



You just gotta love a Roo!



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4. We also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it



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makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a cumulative total of 26 or more dogs in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, we commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes we have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Rob A. Smith

Jeannie Whitton-Smith



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2559

P.O. Box 149
Broomall, PA 19008
(610) 558-4951

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MAR 19 AM 8:59

INDEPENDENT REGULATORY
REVIEW COMMISSION

March 15, 2007

Independent Regulatory Review Commission
Attn: Mr. Arthur Coccodrilli, Chairman
333 Market Street
14th Floor
Harrisburg, PA 17101

Dear Mr. Coccodrilli:

I want to take this opportunity to encourage Pennsylvania's passage of the more detailed, humane dog regulations. Puppy mills must be regulated. Unfortunately, Pennsylvania has become known as "the puppy mill capital of the east"—a dubious distinction. In a civilized society, all living creatures must be treated in a humane, respectful manner. As you are aware, puppy mills further suffering and inhumane conditions for the breeding parents and their offspring. The over-breeding, unsanitary and otherwise horrible conditions in which dogs lived in cramped often rusty pens without appropriate heat and air conditioning and without ever walking on grass and playing as dogs should, and lack of socialization are intolerable. Dogs are intelligent beings that serve man in many capacities—service dog work, search and rescue, war dogs—and deserve much more from us.

Please pass the new, more humane regulations with more "bite" than the current ones. The dogs deserve it and we, as a society, can tolerate no less!

Thank you in advance for your consideration.

Debbie DeSantis, CPDT
Going To The Dogs Obedience Training

2559

Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Sincerely,



Alison Holzer, PhD

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 19 AM 9:00

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

Dear Ms. Bender:

My name is Jared Shade kennel owner of Shadey Acre's Kennel in Northumberland County, and President of the Pennsylvania Beagle Gundog Association (PBGA). I have been a licensed kennel owner for 3 years, involved with the PBGA for 5 years, and a member of local beagle clubs for 5 years.

I am writing to comment on the proposed amendments to the Pennsylvania dog law regulations issued on December 16, 2006. I believe that inhumane and substandard kennel conditions should not be tolerated, but I do not agree that most of the proposed regulatory changes are needed, or would necessarily have a beneficial outcome if adopted. Many are impractical, excessively burdensome and costly, unenforceable, and/or will not improve the quality of life for the dogs in these kennels.

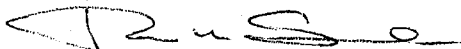
Examples of problems with the proposal are the following:

- * The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- * The obligations of owners of "temporary housing" which are made subject to inspection by the proposal are not enumerated or limited.
- * There is no scientific or accepted husbandry basis for the amended space and exercise requirements.
- * The regulations will require wholesale renovation, if not rebuilding, of many kennels already built in compliance with current federal and/or state standards. There is no scientific foundation for the arbitrary, rigid engineering standards specified.
- * Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new standards, would be unable to 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 and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances. Such egregious circumstances already violate existing regulations.

The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. If, after implementing its recently announced enhanced enforcement program, the Bureau finds it is still unable to prevent inhumane treatment of dogs because of specific deficiencies in the existing regulations, it should cite these specific deficiencies and propose changes based on them. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has 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,



Jared W. Shade

March 12, 2007

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

Dear Ms. Bender:

I am writing to you in opposition of the proposed amendments to the Pennsylvania dog law regulations. I do not believe in inhumane kennel conditions but I do not agree that most of the proposed changes would have a beneficial outcome if adopted.

As a past president and current member of the Weimaraner Club of America, I feel that this bill would discriminate against many of our members who live in Pennsylvania and are small hobby breeders and dog fanciers. These proposals would be burdensome and impractical for quality home-based kennels, breeders and our rescue groups, where these changes are not needed. This would also limit the availability of healthy, well-socialized dogs.

I am also a member of the dog fancy who attends dog events in Pennsylvania such as conformation, agility, obedience shows and field competitions. If severe restrictions are placed on Pennsylvania breeders this may lead to the end of dog events in your state. I would not spend money on events, hotels and restaurants in a state that puts such severe restrictions on responsible breeders. I would also recommend that the Weimaraner Club of America not hold anymore national events in your state. The WCA held its National Specialty show in Gettysburg in 2005 and is planning on holding the 2007 National Specialty in Cranberry, PA.

Examples of problems with the proposal are the following:

- The definition of "temporary housing" would require thousands of small residential hobby and show breeding households to become licensed which could not possibly comply with the regulations, and which there is no reason to regulate.
- Smaller breeders and dog owners who maintain their dogs in their own residential premises but are covered by the Pennsylvania dog law, who provide care and conditions far superior to those required by the proposed new

standards, would be unable to 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 and serve no useful purpose, as it would be impossible to verify their accuracy in all but the most egregious circumstances.
- The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

The Bureau has tacitly conceded that its current regulations have not been adequately enforced. The current proposal appears to be merely a laundry list of ideas for improving the environment for dogs that has 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 strongly urge that this proposal be withdrawn.

Sincerely,



Rosemary Carlson
1705 North Bryant Avenue
Moore, OK 73160

405-912-9876

2559

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March 14, 2007

2007 MAR 21 PM 1:35

Chairman of the Independent Regulatory Review Committee (IRRC)

Arthur Coccodrilli

333 Market Street, 14th Floor

Harrisburg, PA 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Mr. Coccodrilli:

I am writing to you about the Dog Law under review that deals with puppy mills. I would like to suggest that the proposed Pennsylvania regulations account for the following:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

As treasurer of Nittany Beagle Rescue or Lemont, PA and a person who fosters dogs in need of permanent loving homes, I believe that companion animals in need are valuable and as such need special expemption in order to have a chance at survival.

A pet can lower blood pressure, increase happiness, stimulate the owner to participate in physical activity and offer unconditional love. As good stewards, I believe that our effort to increase the quality of life for all pets is important.

Regards,


Ann Echols

181 Winesap Drive
Port Matilda, PA 16870
814-692-5313

2559

March 14, 2007

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

**RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations**

Dear Ms. Bender:

As a matter of introduction my name is Stephanie Kaufman. I have been present at Mr. Rendell's dog law meetings. I even had a chance to give him my business card and had my photo taken with him. I would love to talk to either Mr. Rendell or yourself about the new laws you are considering. **Puppy Mills need to be STOPPED but please do not hurt rescue groups as well.** Please see my proposal below and if you have any questions please contact me.

I would like to submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all **volunteer** rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing

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REVIEW COMMISSION

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them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

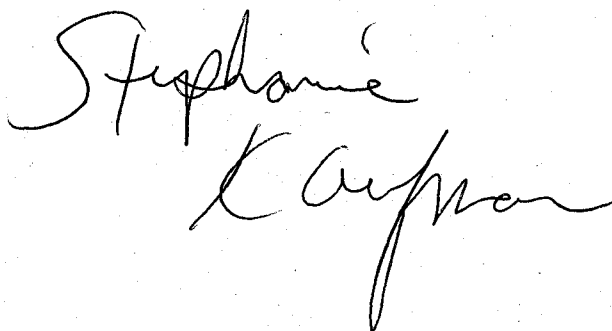
For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened than they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders. **Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.**

Respectfully submitted,

Stephanie Kaufman

A handwritten signature in cursive script that reads "Stephanie Kaufman". The signature is written in dark ink and is positioned to the right of the typed name.

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

2559

March 13, 2007

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

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The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened

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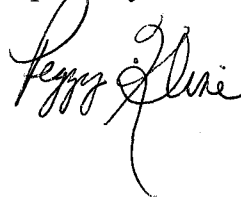
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In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders. Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Peggy Glavin".

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

FACSIMILE TRANSMITTAL SHEET

TO: Ms. Mary Bender	FROM: Lesley Wieland Jackson
FAX NUMBER: 717-772-4352	DATE: 3/15/07
COMPANY: PA Dept of Agriculture, Bureau of Dog Law Enforcement	TOTAL NO. OF PAGES INCLUDING COVER: 1
PHONE NUMBER: 717-787-3062	SENDER'S REFERENCE NUMBER:
RE: Dog Law Regulations	YOUR REFERENCE NUMBER:

URGENT
 FOR REVIEW
 PLEASE COMMENT
 PLEASE REPLY
 PLEASE RECYCLE

NOTES/COMMENTS:

Ms. Bender,

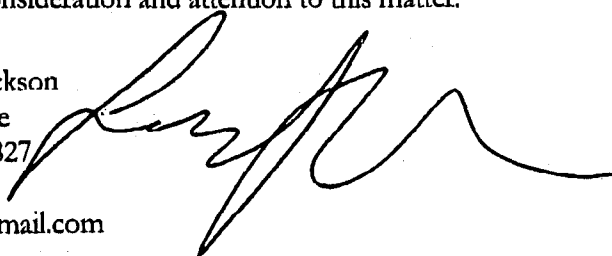
I am a registered voter and PA resident and I'm writing you today to express my concern about the Dog Law regulations.

It is my understanding that some are against the dog law as it would hurt reputable breeders and kennel owners. If indeed a breeder/kennel owner is of high repute, then by definition they should want to highest quality of life possible for companion animals. Otherwise, how can they claim to be reputable? Furthermore, reputable breeders and kennels would only be helped by a law that puts tighter restrictions on companion animal small businesses; forcing so-called "puppy mills" out of business could only help their businesses. In addition, I'd like to make the following points:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration and attention to this matter.

Lesley Wieland Jackson
709 Boalsburg Pike
Boalsburg, PA 16827
(814) 441-0773
Jackson.Lesley@gmail.com



VERNE R. SMITH

140 E. Chelton Rd.
Brookhaven, PA 19015

Ms. Mary Bender
Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
2301 No. Cameron St.
Harrisburg, PA 17110-9408

Mr. Arthur Coccodrilli
333 Market St., 14th Fl.
Harrisburg, PA 17101

Greetings:

I submit the following comments regarding the proposed new regulations to Pennsylvania's Dog Law. The new regulations mark an important step forward in recognizing that Pennsylvania's puppy mills are places of horror and unnecessary cruelty for thousands of dogs each year. Additionally, puppy mills cost pet owners hundreds of thousands of dollars each year since the current lack of adequate regulations allow puppy mills to mass produce defective dogs for consumption by unsuspecting consumers.

Although the proposed regulations contain important safeguards against the cruel operation of puppy mills, they are not perfect. Two salient deficiencies are described below.

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices. Most of these groups are staffed largely by volunteers and all of them are not for profit. Since the intent of the regulations is to shut down profiteering by unscrupulous and cruel breeders, the non-profit rescues should be specifically exempted.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations. Currently, the regulations lack an adequate "voice" for these important groups and they clearly deserve a place at the table where they can contribute meaningfully in the formation of a humane dog policy.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Verne R. Smith".

Verne R. Smith

Christine Woolslayer

6936 Tulip Street, Philadelphia PA, 19135

267/738-9108 mobile

215/332-6386 home

215/501-8227 office

cwoolslayer@hotmail.com

Date: March 14, 2007

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

Dear Ms. Bender,

As a concerned voter, lifelong resident of Pennsylvania and longtime owner of rescued pets, I beg of you to help stop the abuse and cruel conditions that go on at the Puppy Mills of Pennsylvania. It sickens me to think of the conditions at these establishments. I will fully support any administration or politician who takes an active role in having these places become illegal as well as enforcing any and all penalties on the puppy mill owners and profiteers.

Two points should be noted when addressing this issue.

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

How this cruel practice has gone on this long without stricter penalties, is mind boggling to me. There are a great deal of pet owners in this state who agree with me and would support any politician who also supports laws addressing the cruelty of puppy mills.

Please contact me if you have any questions. I am very passionate about this cause. Thank you for your consideration.

Sincerely,


Christine Woolslayer

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

Dear Ms. Bender:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration:



Judy Beery
10315 Wanneta Rd.
Albion PA 16401

.....

Theodore W. Piersol
1112 Reservoir Rd.
New Holland, Pa.

March, 14 2007

Ms. Mary Bender
Bureau of Dog Law Enforcement
Department of Agriculture of Pennsylvania

Dear Ms Bender,

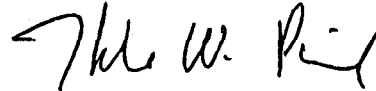
It has come to my attention that there are new proposals to the dog laws of Pennsylvania. After reading the proposals, I would like to voice my concerns that it would severely burden kennels that house packs of hounds for recreational activities such as foxhunting.

I can understand, what you are trying to regulate, but the proposals are too far reaching. I feel it would unjustly affect many of us sportspersons whose sole interest is recreation and with the dogs themselves.

Therefore I am asking if changes could be taken into consideration for us non-commercial, non-profit kennels such as myself, so that we may continue to enjoy our dogs and not be burdened or even maintained because of the new proposals.

Sincerely,

Theodore W. Piersol



Co kennel licensee / member
Cochran Hunt Club / Treasure
Of Chester Co. Foxhunters

.....

Fax # 717-772-4352

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

Ms. Bender:

I am writing to you concerning the new regulations on the "puppy mills" in Pennsylvania. First of all, I feel that all non-profit animal welfare and rescue organizations, especially non-kennel based rescues and fosters should be exempt from the dog law regulations as applied to kennels. These are the very people in these two groups are doing more than any other people in this state to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices (via the puppy mills).

Second of all, non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Please, as an animal lover, which I'm sure you are, for the sake of all animals concerned in this, Listen to the people who are writing similar letters etc. to you who are on the Dog Law Advisory Board and get these changes made to the present regulations.

I thank you in advance for helping all of us "animal lovers" in the State of Pennsylvania and especially the animals who will benefit from these changes to the regulations.

Jerilyn Capaccione

Email address at home: mmmmmm@epix.net

Home phone number: 717-497-1997

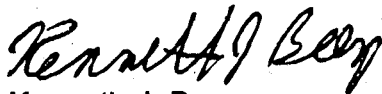
Home address: 77 Union Church Road, Halifax, PA 17032

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

Dear Ms. Bender:

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your consideration:



Kenneth J. Beery
10315 Wanneta Rd.
Albion PA 16401

TO:

BUREAU OF DOG LAW ENFORCEMENT
ATTN: MS MARY BENDER
PA DEPT OF AGRICULTURE

CHAIRMAN OF THE INDEPENDENT REGULATORY REVIEW COMMITTEE
ARTHUR COCCODRILLI

THE BEST FRIENDS ANIMAL SOCIETY IS OFFERING HELP TO MAKE THIS EFFORT SUCCESSFUL FOR EVERYONE!! I HAVE BEEN A LONG TIME CONTRIBUTOR TO THE BEST FRIENDS ANIMAL SOCIETY'S NON-PROFIT ORGANIZATION AND HAVE SEEN FIRST HAND HOW EXTRAORDINARILY SUCCESSFUL, DISCIPLINED AND ORGANIZED THEIR EFFORTS ARE. PLEASE, PLEASE CONSIDER THEIR HELP IN MAKING THE NEW DOG LAW REGULATIONS HELPFUL SO THAT THE ANIMALS COME OUT THE WINNERS. THIS ORGANIZATION WILL DO WHATEVER IT TAKES TO BRING ABOUT THE CHANGES NECESSARY TO PROTECT THOSE WHO ARE ALREADY HELPING AND THEY WILL ALSO HELP PUT AN END TO THOSE ORGANIZATIONS THAT ARE DETRIMENTAL TO THE WELFARE OF THE ANIMALS. THEIR WEBSITE CAN BE VIEWED AT: WWW.BESTFRIENDS.ORG
THANK YOU VERY MUCH FOR YOUR CONSIDERATION AND HELP WITH THE SERIOUS PROBLEM OF PENNSYLVANIA'S PUPPY MILLS.

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.
2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

DEBORAH KORNBAU
4215 WERTZVILLE ROAD
ENOLA PA 17025

Bureau of Dog Law Enforcement
Attn: Ms. Mary Bender
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110-9408
(717) 787-3062
Fax: 717-772-4352

Dear Ms Bender:

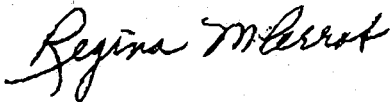
Please do what you can to regulate and stop the horror of puppy mills in our great state of Pennsylvania

The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Thank you for your help.

Sincerely,



Regina M Perrot
548 Montgomery Ave
Haverford PA 19041.

Barbara W. Howard
998 Broad Run Road
West Chester, PA 19380-1532

March 14, 2007

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

VIA FAX
717-772-4352

RE: Pending Puppy Mill control legislation

Dear Ms. Bender,

As a citizen of Pennsylvania, and a dog owner, I wish to express my gratitude concerning the pending legislation to improve and regulate conditions at kennels in Pennsylvania, especially at the "puppy mills" that are numerous in the State.

I would like to ask that allowance for flexibility be included in the legislation for non-profit rescue groups, particularly those that are not kennel based. These organizations do a great deal of good and offer a service that, if not available, would overwhelm the SPCA and other organizations, and result in needless death for many animals.

Also, in order to support and help, rather than hinder, these rescue groups, it would be helpful to have a representative of these rescue groups on the Dog Law Advisory Board.

Thank you for considering my input.

Sincerely,



Barbara W. Howard

March 14, 2007

Bureau of Dog Law Enforcement

Attn: Ms. Mary Bender

Pennsylvania Department of Agriculture

2301 North Cameron Street

Harrisburg, PA. 17710-9408

Please consider my concerns with the proposed new dog law regulations.

1. The Dog Law regulations as applied to kennels should exempt all non-profit animal welfare and rescue organizations, especially non-kennel-based rescues and fosters. These life-saving groups are organized specifically to save and care for the dogs who are given up by their new families because of sickness and genetic disorders caused by bad breeding practices.

2. Representatives from non-profit animal welfare and rescue groups should be included on the Dog Law Advisory Board to better represent the interests of animals in forming these regulations.

Sincerely,



Susan M. Owens
1150 Barber Hollow Road
Tioga, PA. 16946

RECEIVED

2007 MAR 14 AM 8 29

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

Walter F. X. Healy
135 Willow Street #309
Brooklyn Heights, NY 11201
Tel & Fax: 718-625-6631
Cell: 917-881-0515
WaltLawyer@msn.com

March 14, 2007

2 Pages Via Facsimile to 717.783.2664

Independent Regulatory Review Commission
Commonwealth of Pennsylvania

Dear Sir/Ladies:

I worked in Pennsylvania for five years as vice president and general counsel of UGI Corp. in King of Prussia. I developed a high regard for the Commonwealth and its citizens.

Imagine my surprise and embarrassment when I learned that Pennsylvania is known as the Puppy Mill Capital of the East Coast.

My wife and I have adopted two senior female Pomeranians who had been bred in puppy mills. They were in wretched shape with physical and psychological deformities. In each case, rescue groups gave them a year of intensive veterinary care and human hand house acclimation before they were ready to be adopted by us. Even then, we have paid for operations and other veterinary care to alleviate the problems caused by outrageous puppy mill practices.

All life, including those of dogs, cats and other pets, is precious! We treat our adopted Pomeranians as part of our family and are doing our small part to help them live their remaining years with human interaction, affection and comfort.

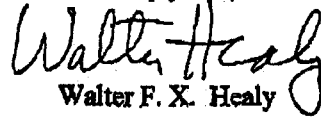
All puppy mills should be shut down. If that is too extreme a solution, I ask at a minimum that the changes to the commercial dog regulations submitted by the Coalition Against Misery be adopted. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the

number of dogs that are kept in a cage. And finally, I ask that you include breeding regulations consistent with those established by reputable breed clubs.

I hope you will have the compassion and wisdom to implement the necessary corrective actions.

Sincerely yours,



Walter F. X. Healy

2559

RECEIVED

- **Dog Law Bureau Director,**
- **Independent Regulatory Review Commission:**

2007 MAR 19 AM 8:59

INDEPENDENT REGULATORY
REVIEW COMMISSION

I wholeheartedly support the changes to the commercial dog regulations submitted by the Coalition

Against Substandard care and conditions for the dogs to increase the profit. I am writing to request that you

immediately take the steps needed to address the horrific conditions in commercial kennels in Pennsylvania.

The proposed regulations by the Pennsylvania Department of Agriculture that were recently published

in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care

and conditions for the dogs in an effort to increase the profit.

I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels

in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning.

Additionally, the regulations should limit the number of dogs that are kept in a cage.

And finally, I am asking that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast.

Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Thank you.

Carol Confessore

801 Prescott Street

Valley Stream NY 11580

Carmen L. Steele
512 Hamilton Street
Allentown, PA 18101

2559

March 16, 2007

RECEIVED

2007 MAR 19 AM 9:59

INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. Arthur Coccodrilli
Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

I want to express my support for the following proposed changes to the Pennsylvania Dog Kennel Regulations:

- The minimum cage size for dogs should be doubled.
- Daily exercise for all dogs should be required – outside of their cages.
- Proper heat should be required, when the temperature drops below 60 degrees.
- Fan or air conditioning cooling should be required, when the temperature rises above 85 degrees.
- Improved ventilation should be required in all Kennel areas.
- No individual who has been convicted of animal cruelty within the last 10 years should be able to obtain a Kennel License.

In my opinion the following exemptions should also be approved:

- An exemption for legitimate shelters from the Kennel expansion and exercise requirements.
- An exemption for legitimate foster homes from Kennel housing requirements. Instead, separate performance standards should be set that are appropriate for home care settings.

The Puppy Mill industry rationalizes that, in a market economy, they must be selling healthy puppies or they would be out business. There is very substantial evidence to the contrary, i.e. that many Puppy Mill puppies (often purchased by unsuspecting people at pet stores) actually have real physical and/or mental problems.

However, even if all of their puppies were healthy, the "Puppy Mills" themselves would be abominable, because of the virtual torture that is experienced on a daily basis by the mothers and fathers of the puppies. They are kept in tiny wire cages, forced to walk on the cage wires, every day of their sad lives – usually with little or no exercise. Often these cages are stacked on one another, so that the dogs in the lower cages are continually living in urine and feces.

Most kennel facilities are woefully inadequate – unheated in the freezing winter months, no protection from sweltering heat in the summer. The horror stories go on and on – dogs with missing feet being forced to walk on the cage wires (because they can still breed), litters of puppies born in the heat of summer and being literally fried to death (because nobody was there to care for them), the parent dogs being electrocuted, shot, or drowned when their breeding value has ended, as well as many, many more atrocities.

Mr. Arthur Coccodrilli
Independent Regulatory Review Commission
March 12, 2007
Page 2

These parent dogs receive non-existent dental care, so many of their teeth are missing or painfully rotten. Dogs that have a lot of fur usually have a lot of matted fur, sometimes so much so that they can't even stand or walk. Real vet care is non-existent, so routine problems are allowed to turn into horrible pain issues for these dogs. Females often experience excruciating pregnancy and/or childbirth pain from being bred while much too young, and also because their internal organs have been damaged by too many caesarian sections.

The heartless people who create and profit from this hideous treatment of defenseless dogs should not only be put out of business, but also prosecuted to the fullest extent of existing cruelty to animals laws. Gov. Edward Rendell has admirably started the process of breaking the cycle of abuse that exists in so many of the Puppy Mills by championing new regulations for kennel operators. The adoption of these new Kennel regulations will be a positive step in providing some protection for the poor, helpless dogs who are lifetime prisoners of these vile Puppy Mills.

Sincerely,


Carmen L. Steele

Dear Ms. Bender, Dog Law Bureau Director, Independent Regulatory Review Commission:

This letter is in regards to the proposed amendments to the Pennsylvania Dog Law regulations at page page 7596 of the Pennsylvania Bulletin published on December 16, 2006 (Volume 36, Number 50). Thank you for extending the public comment period.

As a dog owner and customer of a Pennsylvania training kennel for field dogs, I do not approve of many of the steps recently taken by the Dog Law Advisory Board to update kennel regulations and DO NOT support changes to the commercial dog regulations as an all-encompassing approach to rectify the problems that exist in this state with puppy mills. The proposed regulations by the Pennsylvania Department of Agriculture are not practical for all kennel owners, most certainly not the legitimate ones run by honest, law abiding owners. Undoubtedly, there are kennel owners in Pennsylvania running substandard operations and these owners, without question, should be required to improve their kennels as per existing regulations or risk being shut down.

In particular, some of the proposed changes to the regulations that I find to be unreasonable are as follows:

The regulation that addresses daily exercise is baffling to me. It states that each dog and puppy must be individually exercised on a leash for 20 minutes a day and documented as such. Yet, allowing the dog to run free in yards at the facility for given periods of time or the time spent hunting and training them in the field would not meet this requirement?

Another portion of the proposed regulation that I find equally unreasonable, are the new record keeping requirements. For example, no fewer than six separate forms would have to be completed each day for each dog in a kennel. These include individual daily records for exercising, feeding and watering, sanitizing bowls, sanitizing the kennel, cleaning the kennel and cleaning houses. For a kennel containing 50 dogs, these individual forms would require completing 300 different forms every day.

There's also the requirement to quarantine incoming dogs for a two week period? This would require additional kennel space that most successful facilities would not have. These are just of few of the concerns...

Ms. Bender, these regulations as proposed, will be dreadfully costly to the many quality breeders/kennel owners across the state. Compliance to these new requirements would in most cases, require additional personnel for the facility...totally impractical for the many operations that are operating on shoestring budgets. The kennel owners I have spoken to all agree the state's estimated costs for bringing their operations into compliance are extremely low. Many believe that the additional costs incurred to meet the requirements set forth in the new regulations will put them out of business, which in turn will create two very big problems. First, we would have the loss of jobs that this would create, and secondly, many of the hundreds of dogs that are currently in training kennels would become homeless. (Many customers of dogs in training kennels would not be prepared to take these dogs into their homes as house pets.)

There's also the loss of revenue for the state that this would create in the form of income generated from food, lodging, visits to tourist attractions, etc, as many customers make periodic visits to the training facilities from neighboring states to monitor the progress of their dogs. In my experience in this business, these customers often incorporate leisure time into their visits and stay for extended periods of time, bringing family and friends to take advantage of the many attractions Pennsylvania has to offer.

In closing, please continue your efforts to shut down puppy mills and any other kennel facility in our state where conditions exist that are detrimental to the health and safety of our canine companions. However, please consider this my input **AGAINST** the new proposed revision in the Pennsylvania Kennel Regulations.

Respectfully,

Donald K. Struble

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 PM 1:37

RECEIVED

Department of Agriculture
Bureau of Dog Law Enforcement
Attn: Mary Bender
Harrisburg, PA 17110-9408

March 13, 2007

INDEPENDENT REGULATORY
COMMISSION

2007 MAR 16 PM 1:46

RECEIVED

Dear Ms. Bender:

I am writing in support of the proposed changes to the regulations that affect dogs in puppy mills. I support the following requirements:

- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Required heat when the temperature drops below 50 degrees
- Required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improving ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty

I believe these provisions are necessary to improve the life of the dogs currently suffering in puppy mills. It is appalling to me that the great state of Pennsylvania is nicknamed the "puppy mill capital of the East". My heart breaks when I think of these animals suffering, and it angers me that Pennsylvania's government has not stepped up to do more before now. I implore you to do the right thing and improve the living conditions for these great animals.

I know there has been some concern that animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home". I share these concerns and ask for an exemption for shelters from the kennel expansion and exercise requirements, and feel that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Thank you for your prompt attention to this ever so important matter. If the proposed changes pass, I will be more proud than ever to be a Pennsylvanian.

Sincerely,



Kristen Moffitt
165 N. School Lane
Souderton, PA 18964
(215)723-4752

Cc: Senator Charles T. McIlhinney, Jr.
Senator Stewart Greenleaf
Senator Robert Wonderling
Hon. Robert W. Godshall
Hon. Kate Harper
Hon. Jay Moyer
Hon. Katharine M. Watson

MR. AND MRS. RANDY LONGENBACH
7007 LINCOLN DRIVE
MACUNGIE, PA 18062
610-967-4748

2559

March 15, 2007

Mr. Arthur Cocodrilli
Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 19 AM 8:59

RECEIVED

My wife and I support for the following proposed changes to the Pennsylvania Dog Kennel Regulations:

- The minimum cage size for dogs should be doubled.
- Daily exercise for all dogs should be required – outside of their cages.
- Proper heat should be required, when the temperature drops below 60 degrees.
- Fan or air conditioning cooling should be required, when the temperature rises above 85 degrees.
- Improved ventilation should be required in all Kennel areas.
- No individual who has been convicted of animal cruelty within the last 10 years should be able to obtain a Kennel License.

We also believe that the following exemptions should also be approved:

- An exemption for legitimate shelters from the Kennel expansion and exercise requirements.
- An exemption for legitimate foster homes from Kennel housing requirements. Instead, separate performance standards should be set that are appropriate for home care settings.

Yours truly,



Randy Longenbach

Dear Ms. Bender, Dog Law Bureau Director, Independent Regulatory Review Commission:

This letter is in regards to the proposed amendments to the Pennsylvania Dog Law regulations at page 7596 of the Pennsylvania Bulletin published on December 16, 2006 (Volume 36, Number 50). Thank you for extending the public comment period.

As a dog owner and customer of a Pennsylvania training kennel for field dogs, I do not approve of many of the steps recently taken by the Dog Law Advisory Board to update kennel regulations and DO NOT support changes to the commercial dog regulations as an all-encompassing approach to rectify the problems that exist in this state with puppy mills. The proposed regulations by the Pennsylvania Department of Agriculture are not practical for all kennel owners, most certainly not the legitimate ones run by honest, law abiding owners. Undoubtedly, there are kennel owners in Pennsylvania running substandard operations and these owners, without question, should be required to improve their kennels as per existing regulations or risk being shut down.

In particular, some of the proposed changes to the regulations that I find to be unreasonable are as follows:

The regulation that addresses daily exercise is baffling to me. It states that each dog and puppy must be individually exercised on a leash for 20 minutes a day and documented as such. Yet, allowing the dog to run free in yards at the facility for given periods of time or the time spent hunting and training them in the field would not meet this requirement?

Another portion of the proposed regulation that I find equally unreasonable, are the new record keeping requirements. For example, no fewer than six separate forms would have to be completed each day for each dog in a kennel. These include individual daily records for exercising, feeding and watering, sanitizing bowls, sanitizing the kennel, cleaning the kennel and cleaning houses. For a kennel containing 50 dogs, these individual forms would require completing 300 different forms every day.

There's also the requirement to quarantine incoming dogs for a two week period? This would require additional kennel space that most successful facilities would not have. These are just a few of the concerns...

Ms. Bender, these regulations as proposed, will be dreadfully costly to the many quality breeders/kennel owners across the state. Compliance to these new requirements would in most cases, require additional personnel for the facility...totally impractical for the many operations that are operating on shoestring budgets. The kennel owners I have spoken to all agree the state's estimated costs for bringing their operations into compliance are extremely low. Many believe that the additional costs incurred to meet the requirements set forth in the new regulations will put them out of business, jeopardizing the livelihoods of both the owners and those they employ. This will create two significant problems for the state. First, we would have the loss of jobs that this would create, and secondly, many of the hundreds of dogs that are currently in training kennels would become homeless. (Many customers of dogs in training kennels would not be prepared to take these dogs into their homes as house pets.) These are both existing problems that we most certainly wouldn't want to add to.

There's also the loss of revenue for the state that this would create in the form of income generated from food, lodging, visits to tourist attractions, etc, as many customers make periodic visits to the training facilities from neighboring states to monitor the progress of their dogs. In my experience in this business, these customers often incorporate leisure time into their visits and stay for extended periods of time, bringing family and friends to take advantage of the many attractions Pennsylvania has to offer.

In closing, I urge you to continue your efforts to shut down puppy mills and any other kennel facility in our state where conditions exist that are detrimental to the health and safety of our canine companions. However, please consider this my input **AGAINST** the new proposed revision in the Pennsylvania Kennel Regulations.

Respectfully,

Renee S. Johnson

INDEPENDENT REGULATORY
REVIEW COMMISSION
2007 MAR 6 PM 1:37

RECEIVED

RECEIVED

3-15-07

Manuela Mathieu
1917 Ridgewood Road
Hanover, MD 21076

2007 MAR 16 PM 12:42

INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

Independent Regulatory Review Commission
Fax # 717-783-2664

To the Independent Regulatory Review Commission:


I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

I myself am a dog owner. I know that my dogs can feel physical pain and discomfort, and I know that they can experience emotions such as love, joy, fear, and sadness. Science backs up what I know. I am horrified about the conditions dogs have to endure in puppy mills. How can anybody with a conscience NOT do anything about this?

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Sincerely,



Manuela Mathieu

March 8 2007

Dear Ms. Bender:

I am writing this letter to express my concern for the living conditions of puppy mills.

I do not believe that puppy mills should exist in Pennsylvania or any other place in the United States.

If they have to exist, they should exist in a humane way. No animal should suffer at the hands of a human being.

I support the proposed changes listed below:

- Doubling the minimum cage size
- Requiring daily exercise outside the cage
- Required heat when temperature drops below 50 degrees
- Required cooling either by fan or air conditioning when temperature rises above 85 degrees
- Improving ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty

I support the detail comments submitted by the Humane Society of the US .

I feel that animal shelters and rescue groups should be held exempt from the kennel expansion and exercise requirements.

I feel that foster homes should also be held exempt from kennel housing requirements.

Animal shelters, animal rescues and foster homes should have separate performance standards appropriate for their care settings.

Pennsylvania is a wonderful state and it is disappointing that we are known as the "puppy capital of the East."

I hope these changes will be made and strictly enforced so that we can set an example for the rest of the country of how animals should and must be treated.

Thank You

Sincerely

Amy L. Mattson

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 PM 1:46

RECEIVED

March 6, 2007

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

Dear Mary Bender:

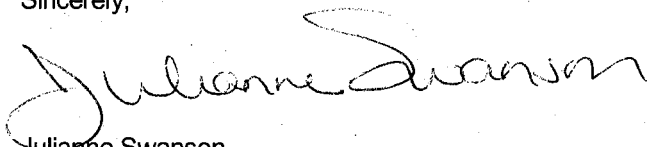
I am writing to ask for better treatment for the dogs in Pennsylvania's puppy mills. I support the proposed changes that would:

- Double the minimum cage size
- Require daily exercise outside of the cage
- Require heat when the temperature drops below 50 degrees
- Required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improve ventilation in kennel areas
- Deny kennel licenses to individuals convicted of animal cruelty within the past 10 years

I also want to ask for an exemption for shelters from the kennel expansion and exercise requirements and note that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Please help the tens of thousands of dogs who suffer in Pennsylvania's puppy mills. This is a disgrace to our state. Governor Ed Rendell is committed to helping these dogs.

Sincerely,



Julianne Swanson
2675 Kutztown Road
Pennsburg, PA 18073-1915

cc:
Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 PM 1:36

RECEIVED

Federal: Urge the Pennsylvania Bureau of Dog Law Enforcement to Adopt Puppy Mill Regulations!

Bill Number: Proposed changes to the Dog Law Regulations

Primary Sponsor(s): PA Department of Agriculture and Bureau of Dog Law Enforcement

ASPCA Position: Support, with comments

Action Needed: Make the changes to the regulations even better by taking advantage of the "comment period" that's part of this process. **Print, sign and send a letter** to Pennsylvania's Dog Law Advisory Board urging them to adopt the proposed changes to the Dog Law regulations.

Lancaster County, Pennsylvania, has the highest concentration of puppy mills of any county in the United States! Pennsylvania's governor recently committed to cleaning up the state's commercial dog breeding industry. Enacting regulations that protect Pennsylvania's kennel dogs from abuse is an important step toward that goal.

The Pennsylvania Department of Agriculture and Bureau of Dog Law Enforcement have introduced changes to the regulations that govern the commercial breeding industry in the state. Many of these changes are vital if Pennsylvania is to improve conditions for dogs kept in commercial kennels and put an end to the State's reputation as the "Puppy Mill Capital of the East."

These new regulations, if enacted, will drastically improve conditions for dogs in commercial breeding facilities in Pennsylvania. The new regulations will:

- Double the required cage size for dogs.
- Improve standards such as sanitation, drainage and ventilation.
- Prohibit people from buying dogs from unlicensed dealers.
- Require that all dogs be provided with a minimum of 20 minutes of exercise per day.

The commercial breeding industry has made a number of inaccurate and potentially damaging statements about the proposed regulations. The proposed regulations **will not** impose restrictions on small hobby breeders who raise fewer than 26 dogs in a year; nor will the regulations impact dog shows, dog parks, or other dog events held in the state. The regulations are aimed specifically at regulating large scale commercial breeders.

It is crucial that the Bureau of Dog Law Enforcement hear from you by March 16th to refute the breeding industry's false assertions.

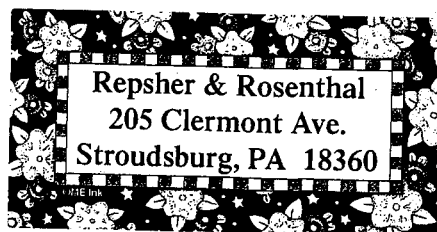
Please take action now by printing this letter (Download: [Word Document](#) | [Plain Text](#)) and sending it to the Bureau of Dog Law Enforcement! The letter is an official comment on the proposed regulations. The ASPCA supports the regulations, but there are things that could be added and amended to strengthen the regulations and better protect dogs at commercial breeding facilities in Pennsylvania. This letter reflects some of the changes that we feel are most important.

Before you mail the letter, please take a moment to attach some personal comments. We have been told that personalized letters are much more effective than mere printouts with signatures. Just a couple of sentences, handwritten or typed, about why you feel commercial dog kennel reform is important can make a big difference.

The Bureau must receive your comments by March 16th. Unfortunately, the Bureau is only accepting letters through the U.S. Postal Service, so the ASPCA cannot send the letter for you via email. **Please ask friends and family to send a letter as well!**

Send the letter to:

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



*Please help
 the puppies in
 dogs!
 Deb Repsher*

RECEIVED
 2007 MAR 16 PM 3:09
 INDEPENDENT REPORTS
 REVIEW COMMITTEE

Sharon A. Terry
5927 Chapel Creek Ct.
Charlotte, NC 28226

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

March 6, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 PM 1:41

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owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

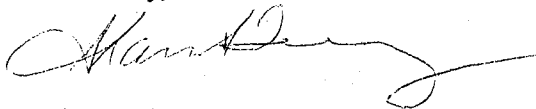
9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of

sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface, and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon A. Terry", written in black ink.

Sharon A. Terry

Bender, Mary

From: TiffanyWSmith@aol.com
Sent: Monday, March 12, 2007 9:44 AM
To: mabender@state.pa.us
Subject: Comments on proposed Dog Law regulations

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

March 12, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.

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4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of current and proper veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to require dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

3/12/2007

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 PM 1:33

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11. Animal hoarders; and
12. Civil liability issues.

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9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and

3/12/2007

consideration.

Sincerely,

Tiffany Smith

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3/12/2007

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regul
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Sincerely,

Sharon Shaver

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 PM 1:36

RECEIVED

January 24, 2007

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

RECEIVED
2007 MAR 16 PM 1:30
INDEPENDENT REGULATION
FEDERAL COMMISSION

Dear Ms. Bender,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

Ruth Bessler

Mt. Valley Farms
840 Shippensburg Rd
Biglerville, PA 17307

January 26, 2007

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

RECEIVED

2007 MAR 16 PM 1:43

INDEPENDENT REGULATION
PENNY COMMISSION

Dear Ms. Bender,

I am writing in response to the proposed amendments to the Dog Law Act 225 which was issued on December 16, 2006.

With a full understanding that the bureau is trying to improve substandard kennel conditions, I am not in agreement that most of the changes are necessary.

The proposed record keeping would require me to write down the date and time I washed each food and water bowl, every time a pen is cleaned; each individual outside run is cleaned, etc. It would be better for me to have my general daily procedures that I routinely follow, in writing. This is similar to how the USDA regulations are worded.

The proposed changes would also require the demolition of Pennsylvania's licensed and inspected kennels. Yet, there is no scientific basis for the change. In addition, the average cost to rebuild kennel will be between \$30,000.00 and \$500,000.00 each.

I sincerely urge that this proposal be withdrawn, as the beneficial outcome will be in question if the proposal is adopted.

Yours truly,

Mike Taylor

March 13, 2007

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

RECEIVED
2007 MAR 16 AM 8:22
INDEPENDENT REGULATORY
REVIEW COMMISSION

**RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations**

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

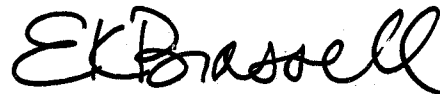
For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened

that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders. Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.

Respectfully submitted,



Elizabeth K. Brassell
102 Cherrington Dr.
Harrisburg, PA 17110

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

March 13, 2007

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

**RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations**

Dear Ms. Bender:

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The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 AM 8:23

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March 13, 2007

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

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Dog Law Regulations**

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INDEPENDENT REGULATORY
RENEW COMMISSION

2007 MAR 16 AM 8:24

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that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders. Allowing this production to continue will sanction the killing of animals by shelters all across the Commonwealth.

Respectfully submitted,



Cyndi Lindenmuth
CPAA Member

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

March 13, 2007

Independent Regulatory Review Commission
Attn: Arthur Coccodrilli, Chairman
333 Market Street, 14th Floor
Harrisburg, PA 17101

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 AM 8:24

RECEIVED

**RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations**

Dear Mr. Coccodrilli:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

The purpose of these revised regulations was supposed to be to better regulate living conditions for the animals raised in puppy mills and other breeding facilities. Extending the regulation to include all volunteer non-kennel based rescues and foster homes does nothing to regulate the puppy millers. Instead, the proposed regulations impose standards upon private, all volunteer rescues that they would be unable to afford to meet, forcing them to close down, thereby jeopardizing the lives of the tens of thousands of animals assisted by rescues each year.

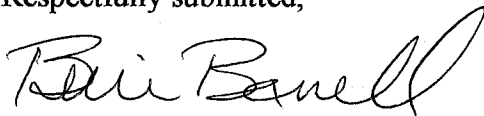
For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened

that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

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Respectfully submitted,



Brian Brassell

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

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

March 13, 2007

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 16 AM 8:25

RECEIVED

**RE: Regulation ID # 2-152 (#2559)
Dog Law Regulations**

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

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This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. The foster dogs are the "temporary" pets kept by a household until the animal finds its permanent home. These animals are not crated or kept in kennel-like conditions. Instead, the animals are kept inside, in a home environment. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Foster homes utilized by rescues provide more humane living conditions for the animals cared for by rescues, because the animals are indoors, socialized, and become housebroken. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead allowing them to live inside a home.

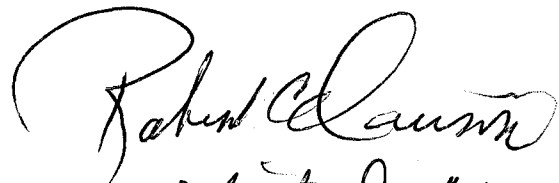
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For example, assume there are 100 foster home-based rescues in Pennsylvania, each handling 1,000 animals per year. If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. The cost to taxpayers would increase due to municipalities having to handle animals previously assisted by rescues. Shelters would be more overburdened that they already are, forcing them to kill the overflow of animals—animals whose lives would have been spared in the rescue system.

Rescues serve an important function. They help animals with no cost to the taxpayers, and aid the state-wide economy by giving veterinarians tremendous business, and well as the pet stores for food and supplies. Thus, putting the rescues out of business--as the regulations would do--would have a far reaching impact on taxpayers and the state-wide economy. Thus, foster based rescues should be exempt from the provisions of these proposed regulations, and there should be an explicit provision stating that in the proposed regulations.

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Respectfully submitted,


521 Misty Dr #6
Lancaster, PA 17603
717-397-1816

✓ cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120

2559

March 14, 2007

Attn: Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Sincerely,
Sarah Abernathy
Monterey, CA 93940
831-373-7052

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 15 AM 8:49

RECEIVED

2559

It's The Pits

K-9 Rescue
P.O. Box 720008
San Diego, CA 92172-0008

March 14, 2007

Director
Independent Regulatory Review Commission
Fax (717) 783-2664

Dear Director:

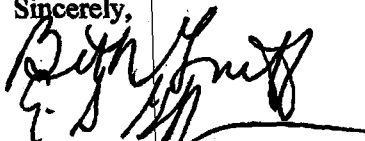
We are a nonprofit dog rescue located in San Diego County, and are writing you to support the changes to the commercial dog regulations submitted by the **Coalition Against Misery**. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

We are strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. We are writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Thank you for your support.

Sincerely,



Beth and Eric Gruff
It's The Pits
www.ItsThePits.org

RECEIVED
2007 MAR 15 AM 8:49
INDEPENDENT REGULATORY
REVIEW COMMISSION

2559

RECEIVED

2007 MAR 15 AM 8:49

To: Dog Law Bureau Director
Independent Regulatory Review Commission

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Sir/Madam:

I am a supporter of the Coalition Against Misery, and I support the changes to the commercial dog regulations submitted by the Coalition. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to respectfully request that you immediately take steps to address the often horrific, inhumane, and cruel conditions in commercial kennels in Pennsylvania.

Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, I ask that you include breeding regulations consistent with those established by reputable breed clubs.

I have owned dogs all my life, and I have known constant and unconditional love and companionship from each one. I am heartbroken and horrified that humans could treat "man's best friend" so inhumanly. Obviously, the laws and regulations must be stronger, and must be relentlessly enforced until these greedy monsters (puppy mill breeders) get the message.

I have never, nor would I ever, buy a puppy from a pet store.

Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Thank you,

Synthia Rae Warner

2559

RECEIVED

LORI NICELY
5 Watchwater Court
Rockville, MD 20850

2007 MAR 14 AM 11:08

INDEPENDENT REGULATORY
REVIEW COMMISSION

March 14, 2007

ATTN: Independent Regulatory Review Commission

Dear Members of the Commission:

As an animal rights advocate, a member of People for the Ethical Treatment of Animals (PETA), and a regular contributor to: The Humane Society of the United States, Pennsylvania based Dogs Deserve Better www.dogsdeservebetter.com, Montgomery County Humane Society (MD), Frederick County Humane Society (MD), Animal Welfare League of Arlington (VA) and Alleghany Humane Society (VA), I am writing to ask you to please support the changes to the commercial dog regulations submitted by the Coalition Against Misery.

The time is long overdue for us as a society to significantly improve our treatment of our companion animals.

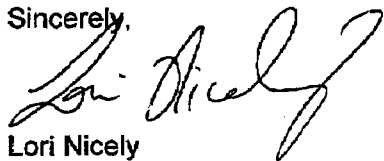
The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. Allowing this to occur in this day and age, in the United States, is an outrage. Causing the needless suffering of an innocent dog is animal cruelty, against the law, and it can and should be remedied immediately.

I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, please include breeding regulations consistent with those established by reputable breed clubs.

Please take steps to ensure that the new regulations provide humane conditions for the dogs. Our society may be judged on how well we protect those who cannot protect themselves.

Sincerely,



Lori Nicely

RECEIVED

2559

2007 MAR 14 AM 9:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

March 14, 2007

To: Dog Law Bureau Director, Independent Regulatory Review
Commission

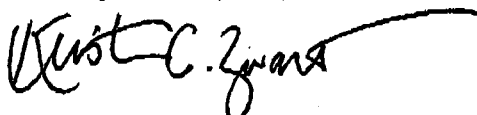
From: Kristin Zwart, Cincinnati, OH

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Thank you,



Kristin C. Zwart

2559

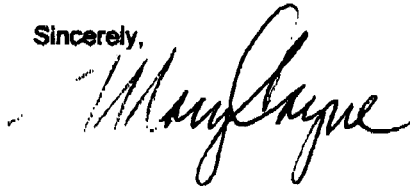
Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

Sincerely,



mary401339@aol.com

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 14 AM 9:20

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2559

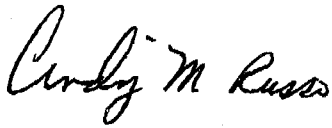
ATTN: IRRRC

Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.



Cindy M. Russo

TO:

Dog Law Bureau Director Mary Bender 717.772.4352

Independent Regulatory Review Commission 717.783.2664

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 14 AM 7:29

RECEIVED

Attachment A

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

February 13, 2007

RE: Comments on Proposed Dog Law Regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to

supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (8 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer a *cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Attachment B

Websites

<http://www.mlar.com/>

<http://www.stoppupmills.org/>

<http://www.unitedagainstupmills.org/>

13 February 2007

Mary Bender, Director
Dog Law Bureau

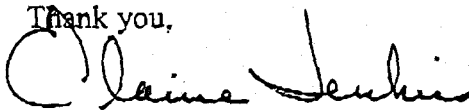
Dear Ms. Bender:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Thank you,



Elaine Jenkins
Lincoln Nebraska

P.S. I have heard it said that you can tell what a culture is like by the way it treats its animals. This is such a cruel and shameful business.

Dog Law Bureau Director Mary Bender 717.772.4352
2-11-07

Dog Law Bureau Director, Independent Regulatory Review Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

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It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs. Thank you.

This year I fostered a 9-year-old Chihuahua that came from a puppy mill in Missouri. Imagine - living 9 years in a wire cage with no medical care, a heart murmur, infected ears, splayed feet from the wire, a permanent cough, no socialization - this was one terrified & sick little dog when I got him. After investing in his medical bills and so much time trying to give this little guy a "normal" life I decided to adopt him. This poor guy has had such a sad life. Please help to make the changes, so that other dogs can be spared at least some of the misery that comes of over-breeding for money.

Thank you,



Linda Visnaw

VISNAWI@CHARTER MI.NET

Attn: Dog Law Bureau Director Mary Bender

FAX: 717.772.4352

Dog Law Bureau Director, Independent Regulatory Review Commission:

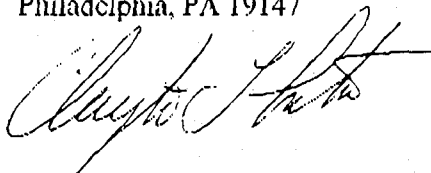
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It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Thank you.

Clayton Fortna
524A Christian Street
Philadelphia, PA 19147

A handwritten signature in cursive script, appearing to read "Clayton Fortna", written in black ink.

February 12, 2007

Dog Law Bureau Director, Independent Regulatory Review
Commission:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. These are lives that we are dealing with! And they are literally freezing to death this time of year.

I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

Please take steps to ensure that the new regulations provide humane conditions for the dogs. You have the power to improve these horrific conditions and save lives.

Please make the changes necessary to end the suffering that is occurring.

Thank you.



Shannon Rudolph Umthum

I support the regulatory changes to the commercial dog regulations submitted by the Coalition Against Misery.

The draft regulations that were recently released by the Pennsylvania Department of Agriculture do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

Animals are freezing to death. Animals are being neglected. Animals are being abused. Let's do something about this.

**Meagan Baalman
meaganbarnickel@yahoo.com**

Dog Law Bureau Director

Mary Bender

717.772.4352

Independent Regulatory Review Commission

717.783.2664

Renee Snyder, Ph.D.

155 MONTE CRESTA AVE #106, OAKLAND, CALIFORNIA 94611

February 16, 2007

Dog Law Bureau Director Mary Bender
(717) 772-4352

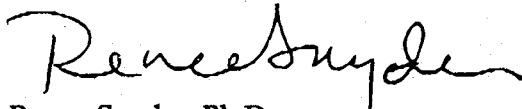
Dog Law Bureau Director:

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

You should be embarrassed that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Sincerely,



Renee Snyder, Ph.D.

2559

RECEIVED

February 10, 2007

2007 MAR 13 PM 12:42

Bureau of Dog Law Enforcement

Attention: Ms. Mary Bender, Director

INDEPENDENT REGULATORY
REVIEW COMMISSION

Pa. Department of Agriculture

2301 N. Cameron Street

Harrisburg, Pa 17110-9408

Dear Ms. Bender:

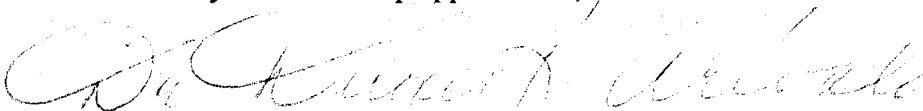
I write to implore you to use your power and position to "speak" for those who have no voice and who suffer in silence, cold, neglect and horrific conditions. The way we treat our companion animals is a reflection on our own humanity. Please support the changes we are suggesting. My own dog, Ruby, a German Shepherd that we rescued through Save a Shepherd Rescue Alliance in PA was dumped on a highway with her littermates as a puppy. We assume that whoever bred these puppies could not sell them because they had demodex which is an inherited immune deficiency.

I support the changes to the commercial dog regulations submitted by the Coalition Against Misery. The proposed regulations by the Pennsylvania Department of Agriculture that were recently published in the Pennsylvania Bulletin do not adequately address the issues of temperature control, cage conditions and humane breeding practices.

I am strongly opposed to commercial breeding kennels where the costs are minimized by providing substandard care and conditions for the dogs in an effort to increase the profit. I am writing to request that you immediately take steps to address the horrific conditions in commercial kennels in Pennsylvania. Every kennel must be required to have a visible, safe source of heat and air-conditioning. Additionally, the regulations should limit the number of dogs that are kept in a cage. And finally, we ask that you include breeding regulations consistent with those established by reputable breed clubs.

It is a profound embarrassment that Pennsylvania is known as the Puppy Mill Capital of the East Coast. Please take steps to ensure that the new regulations provide humane conditions for the dogs.

Sincerely and with deep appreciation,



Dr. Dolores Rafter Arevalo

610.995.9994 or DRArevalo@msn.com/darevalo@wcupa.edu



**117 Knotty Oak Dr.
Mt. Laurel, NJ 08054**

February 13, 2007

**Ms. Mary Bender
Department of Agriculture
Bureau of Dog Law Enforcement
Harrisburg, PA 17110-9408**

Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supersede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend years living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,


Elaine Hammill

February 10, 2007

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

Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend years living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

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Most sincerely,



Colleen Troiani
RR 2 box 4230
Henryville Pa 18332



February 12, 2007

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

Dear Ms. Bender:

I am writing to you in reference to the new legislation being proposed by lawmakers in PA in an effort to improve the living conditions of animals that live in commercial breeding facilities. I would like to applaud your efforts and thank you for your work on behalf of those who have no voice.

I am writing to enthusiastically support this legislation. It is my hope that legislators will not bend to the special interests of groups who are allowing their collective financial self-interest to supercede the overall welfare of the dogs that live in these commercial breeding facilities. As you are well aware, many of these dogs spend **years** living in cramped cages with little or no medical care, no good nutrition, no socialization and no opportunity for regular exercise. It is unfortunate indeed that some turn a blind eye to the suffering of these helpless animals. I fully realize that these are the facilities that this legislation is intended to regulate more effectively.

Once again, I applaud your efforts on behalf of the helpless animals that are suffering in the state of PA at this very moment due to the greed of certain individuals. I hope that you will work tirelessly to see to it that this legislation can be passed and become law. It is my hope that the final legislation will not interfere with the work of shelters and rescues who are already working tirelessly on behalf of animals. That being said, I would like to once again express my support of this legislation.

Most sincerely,

Dorothy Reed
Lehigh Acres, Florida

2559

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17110

March 13, 2007

Dear Mr. Coccodrilli:

I am writing in support of the proposed changes to the regulations that affect dogs in puppy mills. I support the following requirements:

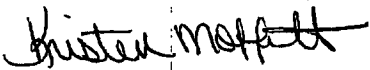
- Doubling the minimum cage size
- Requiring daily exercise outside of the cage
- Required heat when the temperature drops below 50 degrees
- Required cooling (by fan or air conditioning) when the temperature rises above 85 degrees
- Improving ventilation in kennel areas
- Denying kennel licenses to individuals convicted of animal cruelty

I believe these provisions are necessary to improve the life of the dogs currently suffering in puppy mills. It is appalling to me that the great state of Pennsylvania is nicknamed the "puppy mill capital of the East". My heart breaks when I think of these animals suffering, and it angers me that Pennsylvania's government has not stepped up to do more before now. I implore you to do the right thing and improve the living conditions for these great animals.

I know there has been some concern that animal shelters and rescue groups may be affected by the kennel regulations due to the addition of a new definition of "temporary home". I share these concerns and ask for an exemption for shelters from the kennel expansion and exercise requirements, and feel that foster homes should be exempt from kennel housing requirements and instead have separate performance standards appropriate for home care settings.

Thank you for your prompt attention to this ever so important matter. If the proposed changes pass, I will be more proud than ever to be a Pennsylvanian.

Sincerely,



Kristen Moffitt
165 N. School Lane
Souderton, PA 18964
(215)723-4752

Cc: Senator Charles T. McIlhinney, Jr.
Senator Stewart Greenleaf
Senator Robert Wonderling
Hon. Robert W. Godshall
Hon. Kate Harper
Hon. Jay Moyer
Hon. Katharine M. Watson

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAR 13 AM 10:21

RECEIVED

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, with special emphasis on penalties for failure of an individual to comply with licensure provisions. Those should be increased from \$25 to \$500 per violation and from \$25 to \$800 *per day of violation*.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Carlos Perochena

Merrily Nilles
783 Northampton Row
Danville, IN 46122

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

February 18, 2007

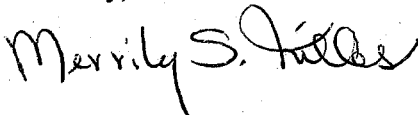
RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Sincerely,



Merrily S. Nilles

Patricia L. Cleckley
331 Bobby Jones Rd.
Sarasota, FL 34232

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

February 20, 2007

Dear Ms. Bender,

I commend the Department of Agriculture & the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law regulations to improve conditions for dogs.

I strongly support the comments submitted by the American Society for the Prevention of Cruelty to Animals.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Cleckley', with a stylized flourish at the end.

Patricia Cleckley

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

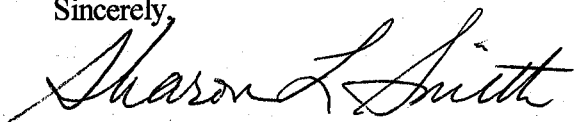
I respectfully submit this comment on the proposed changes to the Dog Law regulations.

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Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members.

Please!!

Sincerely,



Sharon L. Smith

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

February 13, 2007

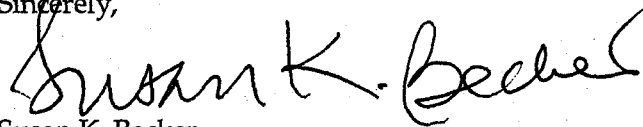
RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania.

I fully support all the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference.

Sincerely,

A handwritten signature in cursive script that reads "Susan K. Becker". The signature is written in dark ink and is positioned above the printed name.

Susan K. Becker

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.
4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition

of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs

more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Anne Caldwell
239 Concord Square
Gurnee, IL 60031-3207

74 Little Falls Rd,
Cedar Grove,
NJ 07009

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

February 20, 2007

Dear Ms. Bender,

RE: Proposed Dog Law Regulations

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania.

I support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and refer to some of them for reference.

Specifically, I strongly support the following:

The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.

I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

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5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
2. State and federal laws relating to animal care, cruelty and neglect;
3. State laws relating to dangerous dogs;
4. State and federal law relating to lack of arrest powers, proper use of search, seizure and warrants;
5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs

more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

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Sincerely,

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

February 13, 2007

RE: Comments on proposed Dog Law regulations

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2559

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RECEIVED

2007 MAR -5 PM 3:35

INDEPENDENT REGULATORY
REVIEW COMMISSION

February 13, 2007

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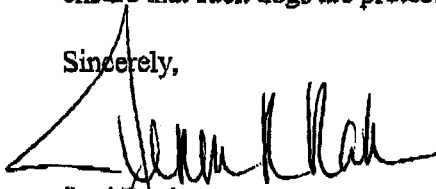
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Sincerely,



Jerri Rook
326 George Street
South Williamsport, PA 17702
(570) 322-3985

February 19, 2007

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

RE: Proposed Dog Law Regulations

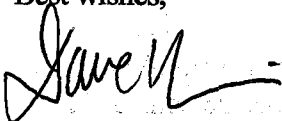
Dear Ms. Bender,

I am writing to offer my full support for the proposed dog law regulations that will improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. As an animal lover and a local elected official, I understand the importance of strengthening and enforcing provisions in the Code that ensure humane treatment of animals. I believe the comments offered by the American Society for the Protection of Cruelty to Animals adequately reflect my concerns on this matter and I urge you to adopt the changes suggested by ASPCA, specifically those relating to:

- stricter penalties for violation of licensure provisions
- larger minimum cage sizes for dogs in commercial breeding facilities
- proof of current and proper veterinary care
- required training of dog wardens on state and federal laws relating to animal cruelty and care
- mandated cooperation between dog wardens and law enforcement to ensure adequate enforcement of the cruelty laws and the Dog Law
- adequate staffing and supervision of breeding operations
- prohibition on the stacking of cages
- implementation of humane standards regarding flooring and resting boards

Recently, our City Council amended our local animal ordinance to improve living conditions for dogs in our community, and this effort was not without opposition from those who preferred (if not benefited from) the status quo. It was the right thing to do, however. I commend you for likewise taking steps to do the right thing on behalf of those miserable animals that are confined in Pennsylvania's puppy mills. I hope you will adopt the common-sense regulations outlined above and I thank you for your consideration.

Best wishes,



Dave Norris
Member, Charlottesville City Council
Charlottesville, VA

February 19, 2007

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

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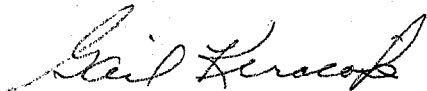
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I commend you for taking steps to do the right thing on behalf of those miserable animals that are confined in Pennsylvania's puppy mills. I hope you will adopt the common-sense regulations outlined above and I thank you for your consideration.

Best wishes,



Gail Kiracofe
Board Member, Cat's Cradle
Harrisonburg, VA

106 Heiskel Drive
Port Matilda, PA 16870
February 19, 2007

Dear Ms. Bender,

I am eighteen years old and a registered voter in the state of Pennsylvania. My family owns three dogs. I would like to voice my support for the proposed changes in the regulations on puppy mills.

I have included the SPCA letter that follows because I agree with its points.

Sincerely,

Richard Klein



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

February 13, 2007

RE: Comments on proposed Dog Law regulations

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Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Klein".

Richard Klein

106 Heiskel Drive
Port Matilda, PA 16870
February 20, 2007

Dear Ms. Bender:

I am writing to support the improved regulations to the commercial raising of dogs. I know that you must be getting a lot of responses, and I want to be counted among the many who wish to see the highest consideration given to the health and well being of the animals being raised in our state. I have included the letter from the SPCA website because I agree with their position on this topic.

Sincerely,



Kevin R. Klein

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

February 13, 2007

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Sincerely,



Kevin R. Klein

January 24, 2007

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

Dear Ms. Bender,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

1. State laws relating to dog licensing, control and owner responsibilities;
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3. State laws relating to dangerous dogs;
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5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.


7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

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Sincerely, Grant Waldman, 8 W. Mechanic Street, New Hope, PA 18938

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

February 13, 2007

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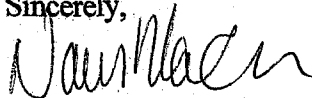
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Sincerely,



Dawn Hacker

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

February 2, 2007

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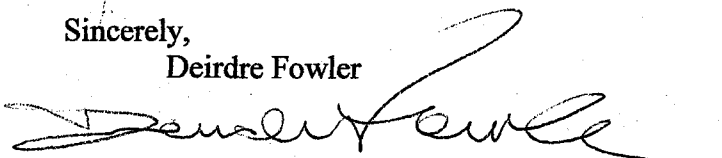
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Sincerely,

Deirdre Fowler



3307 N Baughall Ave
Milwaukee, WI 53211

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

February 12, 2007

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Sincerely,

C. L. Price
33 Birch Court
Newtown, PA 18940



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

February 2, 2007

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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

Wesley M Boyle

Animals have no voice to speak out for their own safety and rights. It is our duty to protect them.

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be

strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

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Sincerely,

Patricia Yampin

P.S. If you really want to make the lives of these animals at least marginally bearable how about prohibiting back to back (every 6 months) breeding & eliminating these thrice-blasted cages in favor of actual kennel runs. Please don't tell me it's cost prohibitive. If you can't humanely care for these dogs you have absolutely no right to constantly use them as breeding commodities.

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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Sincerely,

Thomas O. Norris

Thomas Norris

January 24, 2007

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

Dear Ms. Bender,

As a Pennsylvania breeder, I am strongly opposed to the overly restrictive rules and regulations that are proposed for kennel owners. The enforcement of regulations such as these will effectively serve to shut down or severely curtail the activities of the concerned, caring and law-abiding breeders in Pennsylvania. The extensive number of regulations outlined in this proposal and the limited time allotted prevents the proper consultation and review of these regulations with our kennel veterinarian and other professionals. Therefore, in order to allow for the proper review and consultation of this extensive proposal, I request a ninety-day extension of the comment period.

As a Pennsylvania breeder, my goal and the goal of other law-abiding breeders is to raise the best quality and healthiest puppy possible. This is not the issue. Unfortunately, the issue created by this proposal is my rights as a citizen of this state to own property, and my rights to be afforded due process guaranteed by the provisions of our state's constitution. The vagueness of this proposal causes great concern that my rights as a citizen will be omitted by the bias opinion of those who will hear my side of the story.

As a Pennsylvania breeder, I am concerned that these overly burdensome regulations will have severe unforeseen consequences. These include reduced number of breeders willing to deal with the excessive administrative burden caused by these regulations. The shortages of puppies and resulting higher prices, which will encourage the import of oversea and out of state puppies. The ensuing shortages will provide a lucrative opportunity for those who operate beneath the law to fill these shortages. Those who participate in this black market will find the rewards well worth the risk. Additionally, the economic loss to the state will be in the millions, and will go far beyond the breeder to include pet supply retailers, cities who sponsor shows, and state tax revenue.

As a Pennsylvania breeder, I believe it is unfortunate that this proposal appears to be more about animal activism than about animal welfare. You only have to consider the one section that permits shelters and other similar facilities that provide a "service" to be exempt from these regulations. I immediately question the intent behind those who are pushing the governor on this issue. What sense does it make to remove animals from a substandard facility and place them in another substandard facility? None! Furthermore, this proposal has no incentives or educational programs for the breeders. It is all threats and punishment, which is another indication, that the motives of those supporting this proposal are more interested in eliminating our industry than in improving our industry.

Sincerely,



ESRA M. ZIMMERMAN

11900 ST. RT. 304

AMIFFLINBURG

PA 17844

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

January 31, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking. The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,

Steve M. Stoltzfus
362 School Lane Rd
Gap, PA 17527

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

January 30, 2007

Dear Ms. Bender,

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Stoney Pastures Puppy Haven
362 School Lane Rd
Gap, PA 17527

February 10, 2007
Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
2301 North Cameron Street
Harrisburg, PA 17110-9408

February 2, 2007

RE: Comments on proposed Dog Law regulations

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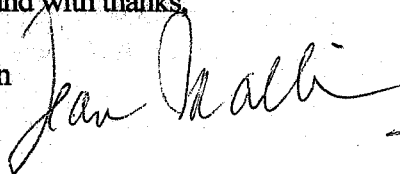
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Sincerely and with thanks,

Jean Mallin

A handwritten signature in cursive script that reads "Jean Mallin". The signature is written in dark ink and is positioned to the right of the typed name "Jean Mallin".

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

February 2, 2007

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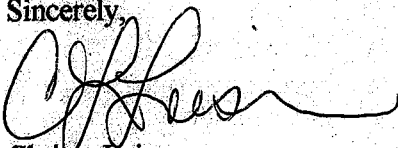
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Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,



Christy Leisure

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

February 7, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

As a concerned citizen of the state of Pennsylvania, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

Furthermore, I fully support the comments submitted by the American Society for the Prevention of Cruelty to Animals (ASPCA) on behalf of its members, and incorporate them herein by reference. Specifically, I strongly support the following:

1. The penalties in § 21.4(1)(iii) for "failure of an individual to comply with licensure provisions" should be increased from \$25 to \$300 per violation to \$25 to \$300 *per day of violation*.
2. The Secretary should be mandating to file suit to enjoin operation of unlicensed kennels where the kennel is not in compliance with the standards in the regulations and is unable to qualify for a license.
3. I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for doubling the required cage size. This is perhaps the most important change that can be made to improve the quality of life for dogs in commercial breeding facilities in Pennsylvania. This provision should remain in the regulations regardless of opposition from breeders. This section should be further strengthened by adding a provision stating that where more than one dog is housed in a primary enclosure, the primary enclosure must provide adequate space for all dogs. For instance, if the enclosure houses two dogs, it must provide double the cage space that would be required for a single dog. If it houses three dogs, it must provide three times the cage space, etc.

4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care for the dog." This provision should also be amended to include excessive matting and excessively long toenails as indications of lack of proper veterinary care. Inadequate grooming can lead to painful medical issues for dogs, including skin lesions from excessive matting and leg and joint injuries from failure to keep toenails appropriately trimmed. Moreover, the section should be amended to *require* dog wardens to order a veterinary check on dogs that exhibit signs of infection, contagious disease or parasite; or that appear to be in poor health where proof of current and proper veterinary care is not provided.

5. A new subsection should be added to § 21.30 clarifying the required training for dog wardens. Training in the following areas should be added into the regulations to expand upon the requirements set forth in 3 P.S. § 459-901:

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5. State and federal laws relating to pounds and shelters;
6. Basics of cruelty and neglect investigations for referral to appropriate authorities;
7. Report-writing and record-keeping;
8. Overview of the legal system, court structure and terminology;
9. Basics of interpreting animal behavior;
10. Identification of injury, disease, abuse and neglect in dogs;
11. Animal hoarders; and
12. Civil liability issues.

6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

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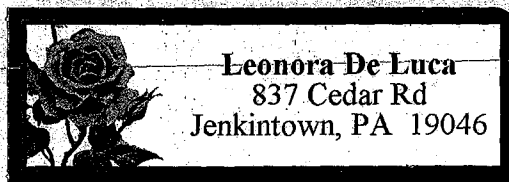

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Sincerely,



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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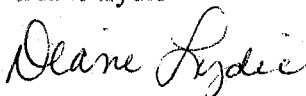
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Sincerely,

Diane Lydic



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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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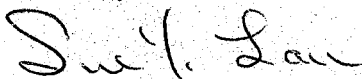
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Sue Lau

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

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Sincerely,

Tracy A. Land

Tracy A. Land
6979 Fairway Dr E.
Fayetteville, PA

17222

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

January 30, 2007

Dear Ms. Bender,

I am writing to express a few concerns that I have with regard to the proposed Dog Law Act 225, which was issued on December 16, 2006.

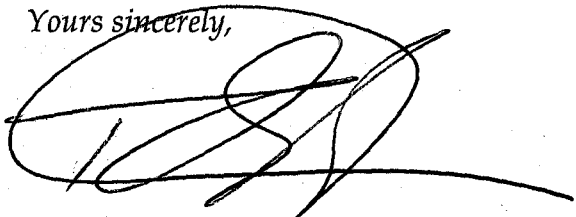
I appreciate that fact that the bureau has helped to improve the dog laws in the past several years. However, the current proposed regulation changes have appeared to be intentionally burdensome and go far beyond mere rulemaking.

The proposals add completely new categories and definition. These changes must be addressed through the legislative process.

The proposed changes require the kennel owner to record every time a water bowl or food pan is washed, every time the primary and secondary pen enclosures are cleaned, and the feeding and watering dates and times, etc. All these burdensome and excessive requirements will require a substantial increase in manpower with many hours dedicated to filling out written bureaucratic reports and divert the small business owner's time away from caring for their animals.

The Departments direction and intentions are neither attributed as accepted canine husbandry practices nor substantiated by science. The Department should base their changes on education to improve the industry. I request that this proposal be withdrawn.

Yours sincerely,



Totally Pets Incorporated
7618 City Ave
Philadelphia, PA 19151

Tom Oprendeck Pres

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

February 9, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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4. I also commend the Department of Agriculture and Bureau of Dog Law Enforcement for including a provision that requires the dog wardens to visually observe the physical condition of each dog. However, the provisions regarding orders of veterinary care should be strengthened to state that the owner must provide "proof of *current and proper* veterinary care

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11. Animal hoarders; and
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6. A new section should be added to the regulations mandating that the Department and dog wardens coordinate and work with law enforcement when applicable. It is imperative that the department work with law enforcement, and specifically Humane Society police officers, to ensure that both the cruelty laws and the Dog Law are adequately enforced.

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8. Stacking primary enclosures on top of one another should be **prohibited**. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

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10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

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Sincerely,
Twee Carroll,
Animal Lover,

Rescuer of lost, abused and abandoned pets.

Still hopeful that fellow man will learn compassion for all living creatures,

Proud Citizen of the United States of America

"Quote by Gandi"

The Greatness of a Nation and it's moral progress can be judged by the way it's animals are treated.



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

February 2, 2007

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Bill Kuzman

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Bureau of Dog Law Enforcement
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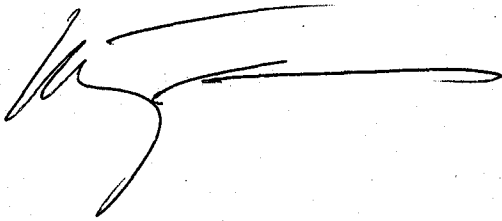
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LINDA G JOHNSON

403 W DURHAM ST

PHILADELPHIA PA 19119

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

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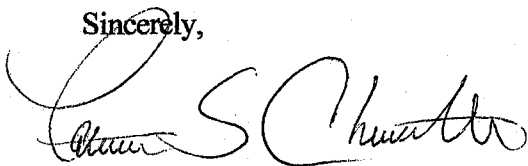
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Patricia Churilla
861 Blue Ridge Rd
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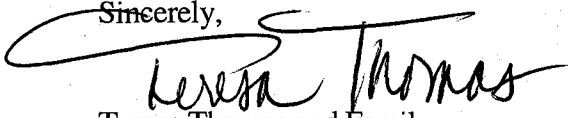
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Sincerely,


Teresa Thomas and Family
8 Queen Anne Lane
Malvern, PA 19355

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

February 2, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

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First, I would like to commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing amendments to the Dog Law Regulations to improve conditions for dogs housed and bred in commercial breeding operations in Pennsylvania. **It should also be noted that the proposed changes to the regulations do not bring hobby breeders under the Act. The same people who were exempt from the former regulations (i.e. hobby breeders who raise, breed, move, sell, etc. fewer than 26 dogs per year), will continue to be exempt under the revised regulations.**

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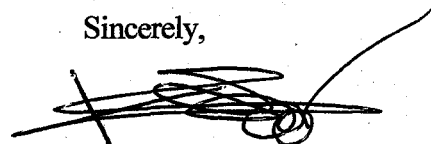
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KARIN R. TOMASOVICH
PHOENIXVILLE, PA

19460

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

February 2, 2007

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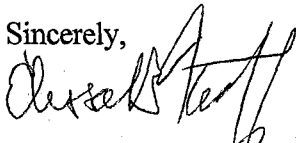
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Elissa B. Katz, Esq.

216 Glen Place

Elkins Park, PA 19027

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

February 2, 2007

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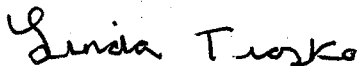
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Linda Trosko

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

February 9, 2007

RE: Comments on proposed Dog Law regulations

Dear Ms. Bender,

I work with dogs that have been rescued from puppy mills. I cannot tell you how pitiful they are when they first make it into Rescue and the work it takes to get them healthy and socialized to be deemed adoptable. As a concerned citizen of the United States, I respectfully submit this comment on the proposed changes to the Dog Law regulations.

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Diane Stavinoha

For the Love of a Lhasa Rescue
15314 East Hampton Circle
Houston, Texas 77071

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

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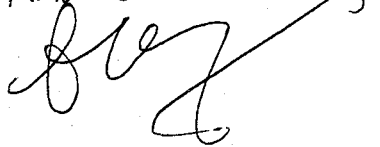
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Andrea McNulty


February 2, 2007

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

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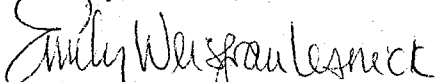
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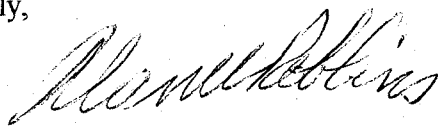
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148A Sutton Rd.
New Millford, PA 18834

Bureau of Dog Law Enforcement
Pennsylvania Department of Agriculture
Attn: Ms. Mary Bender
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7. A new section should be added to the regulations requiring that a licensee must have enough employees to carry out the level of husbandry practices and care required by the Act and its regulations. Additionally, the employees who provide for care and husbandry or handle animals should be supervised by an individual who has the knowledge, background, and experience in proper husbandry and care of dogs to supervise others. The licensee must be certain that the supervisor and other employees can perform to such standards.

8. Stacking primary enclosures on top of one another should be prohibited. Stacking cages creates an unnatural environment for the dogs. Additionally, it makes observation of the dogs more difficult and creates sanitation problems. Even with a tray or partition between cages, it is likely that the partitions may overflow, causing feces, urine, food, water, and hair to fall onto the dogs located in the cages below.

9. The section on wire mesh flooring should be amended to make it at least as strict as the federal Animal Welfare Act, which requires that metal strand flooring be greater than one-eighth of an inch in diameter (9 gauge) or coated with a material such as plastic or fiberglass. Language should also be added requiring that all primary enclosures that have wire mesh flooring also have a resting board of sufficient size to allow each dog in the enclosure to lie in a full lateral recumbent position and be able to make normal postural adjustments. Resting boards are necessary to provide for the comfort of the dog and to allow the animal to have some time away from living on grated fencing. Providing resting boards will result in fewer foot lesions and other foot and leg injuries to the dogs. A solid resting surface that is impervious to moisture is also a more natural environment for the animal, provides a draft-free surface and enables the dog to retain its body heat. A dog feels most vulnerable when lying down, and forcing a dog to lie over an exposed area can contribute to anxiety. Humane standards and survival standards are separate, and creating an environment that merely allows for survival does not necessarily make such an environment humane.

10. Contrary to what the breeding industry states, the engineering standards specified in the proposed regulations do have a scientific foundation. The standards in the proposed regulations are more akin to acceptable husbandry practices. They will bring the engineering standards up to par with, if not above, those set forth in the Animal Welfare Act. Contrary to the hobby breeders' contention, the new regulations will not bring hobby breeders under the purview of the Dog Law. Only kennels that keep, harbor, board, shelter, sell, give away, or transfer *a cumulative total of 26 or more dogs* in one calendar year will be required to comply with the new regulations. As a result, true hobby breeders are still exempt from the law. Good husbandry practices dictate that anyone harboring a larger number of dogs (26 or more) should comply with certain engineering standards to ensure the health, safety, and well-being of the dogs. The Dog Law and its regulations are aimed at regulating larger and commercial breeding facilities. Therefore, the new regulations will not affect hobby breeders, contrary to what the breeding community suggests.

Once again, I commend the Department of Agriculture and the Bureau of Dog Law Enforcement for proposing regulations that will improve the conditions for dogs housed and bred in Pennsylvania's commercial kennels. The changes I have noted above will further ensure that such dogs are protected. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Amber Wallace".

Amber Wallace
Bethlehem, PA