

Vandermark
59 Mitzi Lane
Berwick, PA 18603

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

INDEPENDENT REGULATORY
BOARD COMMISSION

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RECEIVED

Dear Ms. Bender:

Not only am I a dog owner/lover, but I also volunteer with two Northern Breed Rescue Organizations (CHAAMP and Harnessed to Hope) along with non breed specific animal rescue in the area. I also am a volunteer with our local County Animal Response Team under the guidance of the PA State Animal Response Team. My animals are all certified therapy dogs. I am a member of the Back Mountain Kennel Club that supports responsible Pet Ownership and Breeding through the American Kennel Club. So my interest in Animal Legislation is very high. I am also employed by a Pet Food Manufacture so the importance of long term pet ownership is of the utmost importance to me.

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. And as in many previous attempts at legislation, the results seem to put the burden on the wrong population.

Some of the issues with the proposal are of special concern to me. They 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. Many of the "best" breeders are small because they give the animals special, individualized care. They do not mass produce dogs to make a buck. They spend time nurturing, socializing and caring for the animals to make sure that once they head off to their new home, they are prepared for along term commitment. 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. And for what purpose?
 - * I have seen no scientific or other proof to support the amended space and exercise requirements. Additionally, all animals even within a breed have different needs based on their physical and emotional health. Nor is there any supporting documentation to confirm the need for the renovations of many kennels.
 - * Further, 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 and not only could but should be dealt with accordingly.
 - * The proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices. This is particularly important to those of us involved in canine therapy. We spend a great deal of time

socializing our dogs of all shapes and sizes so they are comfortable with each other on our visits to nursing homes and other programs in which we participate as a group. In addition, this would have a serious impact on obedience trainers who currently train all breeds.

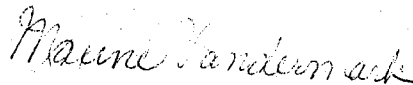
The above is far from a complete list of the deficiencies with the proposed regulations. I also associate myself with the more detailed comments on this proposal by the Pennsylvania Federation of Dog Clubs of which I am connected through my membership in the Kennel Club.

The Bureau has admitted 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.

Take time to try to get it right. Be careful to not limit yourself to the input of small minded organizations that claim to have the best interests of the animals at heart, but rather are serving their own agendas. How we treat animals is an indication of how we treat each other. Forcing unfounded and unreasonable additional rules on the legitimate breeders, owners, rescue groups, and other hobbyist groups serves no purpose and in no way promotes the long term survival of the animals.

I would appreciate a response on my concerns.

Sincerely,

A handwritten signature in cursive script that reads "Maxine Vandermark".

Maxine Vandermark