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Dear Mary Bender,

INDEPENDENT REGULATORY  
REVIEW COMMISSION

I would like to address the proposed new licensed kennel regulations. Before I do that however I would like to speak honestly about where many of the small breeder/hobbyist are coming from.

The biggest fear most of us have is the proliferation of animal rights laws. Don't misunderstand, we all love our dogs. They are the center of our lives. We plan vacations around them, spend our days doing things with them, and always have their welfare at the forefront of our thoughts. Their welfare is our biggest concern. We abhor the conditions that the puppy farmers and commercial breeders make dogs live in, yet we end up supporting their right to breed, because we fear if we don't, we too will lose the right to breed our dogs. We are glad the State of Pa. is addressing the puppy mill issue, we just want you to use common sense when setting up the new regulations.

Many hobbyist's have class one kennels. This gives us a safe and comfortable place to grow out a young dog, to keep an oldster who might not have good control of his bowels anymore, and yes, to raise a litter of puppies. Mostly, our dogs live in our homes with us. We don't want to lose the ability to make our decisions where our dogs live. Perhaps you need to consider a special license for the hobbyist/show kennel, as well as the boarding kennels since they must protect the well-being of their customer's dogs. I would like to suggest for the hobbyist kennel these points:

- 1) Proof of membership in a recognized kennel club
- 2) Proof of show or event entry
- 3) No more than a class 2 size kennel. This should cover most professional handlers.

There are several key issues which I believe to be the most important. They are:

1). Recognize there is a difference between a crate and a kennel. A crate is used for temporary confinement such as transporting the dog in a car, housebreaking a puppy, or confining the dog when he is unsupervised such as when the owner is sleeping or at work. A crate should NOT be oversized for the dog because many dogs and especially puppies will potty in it. Thus leaving the dog in a soiled and wet crate possibly for hours. Its important you word this that the crate is TEMPORARY confinement. Inspectors finding evidence that dogs are confined to a crate longer than a total of 12 hours a day should be citing the dog owners. Bear in mind, we are not talking about the average pet owner who may be crating a dog while sleeping and than again while working. We are talking about breeding kennel owners.

2). Section 21.23 SPACE "a"

Kennel sizes need to be made larger without a doubt. I know the commercial breeders are "HOWLING" on this one. Good, let them howl even louder. How would you like to spend your life in a cage that was 12 inches bigger than you were? You're on the right track with this regulation. Now make it realistic. Dogs 50 lb.s and bigger should have no less than 48 square feet ( a 6x8 kennel), 25-40 lb.s 24 square feet ( 4x6) and less than 25 lb.s should be in 16 square feet ( 4x4). You can be reasonable about this and include the

total amount of space a dog has such as an indoor/outdoor combination.

### 3). Section 21.23 "e" Outdoor time and exercise.

Bless you for this one. If you have ever seen a dog that was taken from a puppy mill and put on the ground you would see without a doubt how important this is. The poor dogs hop from spot to spot because that is what they had to do in the cage to move around. They don't know they can walk or run. They shy from shadows, blowing leaves, and someone walking by. They react in horror when their feet touch the grass for the first time. Please don't back down on this one.

I think it's important to define what you want to accomplish though. Is it enough to just give the dog some air, or do you really want to provide exercise? Unquestionably a dog that has exercise is healthier and happier. Are you trying to get to the point that all commercial breeding kennels will provide much more outside time than 20 minutes, or just happier dogs in general? If so, than require a run for each dog, or at least one run for up to 8 dogs. This would give more time available for each dog, and possibly more social interaction.

The exercise area itself: First of all, you need to recognize that different breeds of dogs have different exercise requirements. The herding, sporting and working dog people would not like their dogs confined to a concrete area for exercise. These are big moving dogs and it's too hard on their joints to run and turn on concrete. Also true, the toy and non-sporting group people will probably like to have their dogs on concrete as these breeds tend to have long coats that could be ruined. Naturally, to the puppy mills none of this will matter. So, let us choose what best suits our breed of dogs. Give your inspectors the authority to make kennel owners prove their exercise areas are being used if the inspector is in doubt.

Also, covered areas tend to become slimy and stinky without sunlight because it never dries out completely. All exercise requirements should be weather permitting. My German Shepherds can tolerate a lot colder weather than a little toy poodle can, but I sure wouldn't want them out when it is icy or slippery.

So, yes require an exercise area, specify a minimum size, but let us exercise our dogs on grass, or wherever we choose. I think it's especially important for the dogs to be exposed to sunlight and it should be weather permitting.

Here again, separating a commercial kennel from a hobbyist kennel would probably be the best thing.

### Section 21.24b.11 "c" TETHERS

Tethers should not be permitted at all. Period! There are enough studies that provide evidence that dogs tethered become aggressive. It is harmful to their neck and shoulder areas as well.

### Section 21.24 f 8 Record Keeping ---Also---Section 21.41 Records

This is excessive and the time needed to comply will only take time away from the dogs themselves. Again, give your inspectors the authority to check if the facilities are clean and being managed to ensure the best welfare of the dogs.

### Section 21.24 "iii" Gutter between indoor and outdoor section of kennel.

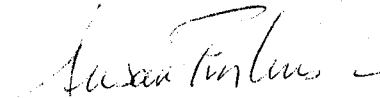
Okay, this one is really unnecessary. Why would you want a gutter for the dog to step out into when he comes outside from his indoor enclosure? Then, you are supposed to have another gutter at the end of the run? First of all, a dog stepping out his door directly into a rounded gutter is likely to get hurt, as well as dirty. Secondly, said gutter will undermine the foundation of the building. We want water and other wetness away from buildings, not laying there.

Section 21.24 viii 17 Another business operated in same building

This makes sense unless it is dog related. Again, to the small hobbyist or show handler this will be a problem. Many small training kennels or show kennels have grooming areas where they are accessible to dogs in kennels. This will cause many small business owners to shut down since it won't either be possible to add walls, or cost effective. Rerword it to be " other than dog related businesses"

In conclusion, a big Thank You to the advisory board for all their hard work and dedication. I've no doubt you all have worked hard on this for the benefit of the dogs and the people who will own their offspring as pets. I urge you to make reasonable decisions, yet don't back down to the commercial breeders.

Sincerely,



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