

March 14, 2007

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

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

Dear Mr. Coccodrilli:

I am writing to submit comments on Governor Rendell's proposal to revise Pennsylvania's dog law regulations to crack down on puppy mills. I am the Vice President of Centre County PAWS, a non-profit animal rescue group and shelter in State College. However, I write this letter in a personal capacity and not on behalf of PAWS.

I strongly support Governor Rendell's commitment to improve conditions at puppy mills in Pennsylvania. However, as someone involved in animal rescue, I have two concerns about how the proposed regulations would affect rescue groups and shelters like PAWS.

First, section 21.14(a)(3)(ii) of the draft regulations appears as written to cover foster homes, which are used extensively by animal rescue groups throughout Pennsylvania. Dogs that are placed in foster care are kept in a home environment just like owned dogs, not in kennel-like conditions. Foster homes provide a more humane living environment for dogs than kennels because the dogs are indoors, socialized, and can become housetrained. Because of this, dogs in foster homes are typically adopted much more quickly than dogs in kennels. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. Realistically it is also unenforceable given the large number of foster homes utilized by rescue groups in Pennsylvania, although if it were enforced it would mean the end of foster homes for rescue dogs in Pennsylvania.

Second, the exemption in section 21.15 from the proposed new quarantine and space provisions for dog control facilities authorized to receive grants under section 1002(a) of the Pennsylvania Dog Law is sound but too narrow. Non-profit animal rescue groups throughout Pennsylvania that are not currently authorized to receive these grants perform a similar government service to humane societies and SPCAs by taking in abandoned dogs from the general public and, indirectly (via dog control facilities), stray dogs.

For these reasons I recommend that foster homes as used by non-profit animal rescue groups and shelters be exempted from section 21.14(a)(3)(ii) of the draft regulations, and that the exemption in section 21.15 be broadened to include all non-profit animal rescue groups and shelters in Pennsylvania.

Sincerely,



David Abler
702 Windsor Court, State College, PA 16801
Phone: (814) 234-0363
Email: dave@bythenumbers.info