

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

2559

Dear Ms. Bender:

My name is Chis Warriner and I own Camp KCS in Long Pond. 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. Below you will find some of the problems.

According to the Private Sector section of the proposal, it states that the estimated cost would be between 5,000 to 20,000 dollars. Since the addition to my kennel was just completed I happen to know that the cost would be more like 20,000 to 40,000. The regulations will require major 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 rigid engineering standards specified.

General public section states that the new regulations would impose no costs and have no fiscal impact on the general public. I disagree, since the new laws would put a big financial burden on kennel owners, they would have to increase the prices, which would ultimately have a costly effect on the general public. It is my belief that pet owners who count on kennels like mine to provide housing services far superior then the current regulations call for would not be able to meet the price increase there for ultimately jeopardizing the existence of great kennels.

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 proposals pertaining to housing and social interaction of dogs of different sizes are contrary to good husbandry, socialization and training practices.

Although I do agree that some of the laws could be more specific, I would like to propose some changes I believe should be made:

1. **Definitions section - Grand Father** - The use of an existing kennel, no changes shall be imposed.
2. **Exemptions 21:15 - (3)** Kennels that are already in existence, with current kennel licenses and that have had less then two violations in the last tens years, shall be grand fathered.
3. **Record keeping 21:14** - The new proposed regulations should be establishment specific. This section should be rewritten.
4. **Private sector** - Should be deleted because the statement is untrue.
5. **General Public** - should be deleted because the statement is untrue

The above is far from a complete list of the deficiencies with the proposed regulations.

Sincerely yours,

Chris Warriner
Karen Vales
Camp KCS

INDEPENDENT REGULATORY
REVIEW COMMISSION

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