



March 14, 2007

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

Dear Ms. Bender:

I am the president of the board of directors of the Humane Society of the Harrisburg Area, Inc (the Humane Society) and want to thank you for allowing me on behalf of our board of directors to respond to the proposed changes to the kennel regulations as outlined in the *Pennsylvania Bulletin* dated December 16, 2006. I really appreciate Governor Rendell's, the Bureau's and your commitment to ending the heinous abuses of puppy mills.

Unfortunately, some of the regulations if adopted in their current form would have the impact of shutting down the Humane Society. I cannot speak on behalf other humane societies, SPCA's, kennels or rescues but I believe that the additional costs that we would incur to adopt these regulations would be more than we can afford. I wanted to give you some background on our financial situation. We operate two shelters-one on the East Shore and one on the West Shore. We rely primarily on donations from individuals and to a lesser extent bequests and estates to fund our operations. Contributions from corporations, unfortunately, are minimal. There are few grants from governments and private foundations that we are eligible for, although we are constantly looking for such grants. We have contracts with approximately 40 municipalities for animal control but the revenues from these contracts do not cover the related costs for animal care. We run a very "lean" operation and our dedicated staff rarely get pay increases.

Two of the requirements of the proposed regulations in the view of our board and executive director really are solutions to problems that do not exist for our shelter. The proposed regulations would mandate that each outside and inside kennel have a six inch drain. Our kennels currently have 5 1/2 inch drains. We have never had a problem of either drainage backing up or having standing water (which we agree is a health hazard) into the kennels either due to rain/flooding or for other reasons. To replace each drain in each of our approximate 150 kennels in both shelters would be extremely costly and from our perspective done for no valid reason.

East Shore Shelter  
7790 Grayson Road  
Harrisburg, PA 17111  
(717) 564-3320

West Shore Shelter  
710 Eppley Road  
Mechanicsburg, PA 17055  
(717) 697-8547

[www.humanesocietyhbg.org](http://www.humanesocietyhbg.org)

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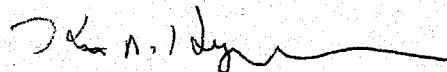
INDEPENDENT REGULATORY  
REVIEW COMMISSION

We agree that adequate exercise is important for the physical and mental well being of the dogs. We have a vibrant dog walking program done by volunteers; staff when they have the time also walk dogs. However, to mandate that each dog get a certain amount of exercise each day and that the time for such exercise be logged in each day is not realistic. We have a courtyard where our dogs can run and play in our East Shore Shelter but such courtyard is not covered and, therefore, can not be used in inclement weather. Again, we rely much on volunteers for dog walking given that we do not always have adequate staffing to do the dog walking. Our volunteers are very dependable but we do not always have dog walkers each day. The cost of additional paperwork, adding staff to do the additional walking and the cost of covering our courtyard would be additional costs for the Humane Society that we cannot currently bear. One suggestion if the Bureau is serious about implementing the exercise regulations would be to offer "exercise grants" to help shelters defray the costs of additional capital expenditures and employees needed to comply with the exercise regulations.

The regulations also bring about the need for additional record keeping not only to track when the dogs exercise but also to track all feeding. Our employees sometimes struggle with the current requirements of tracking the intake, adoptions and euthanizations of dogs. To add the additional requirements on top of the current requirements, would necessitate the hiring of a director of record keeping, a position we do not see the value in our organization.

Again, we are willing to work with the Bureau in any way possible to ensure that the important task of ending the heinous abuses of puppy mills is met. I invite the Governor, any senator or representative, the Department, the Bureau, your staff and you to come to our two shelters, especially given our proximity to the Capitol, so that you can see the great work the Humane Society is doing given our financial situation. Thank for your letting me respond to the proposed regulations on behalf of our board of directors

Sincerely,



Kenneth N. Hugendubler, CPA  
President of the Board of Directors  
Humane Society of the Harrisburg Area, Inc.

Copy to: Kim Kaufmann  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101