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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

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

Dear Ms. Bender:

I want to thank you for the Bureau's efforts to better regulate the living conditions for animals in the facilities of kennels and commercial breeders. Additional protections for those animals are long overdue. However, there is an unintended flaw in the proposed regulations which I am sure you are as interested in correcting as the thousands of tax-paying citizens and voters of the Commonwealth that participate in volunteer pet rescue efforts. It is explained in my comments below.

I am a volunteer pet transport driver working with various pet rescue coordinators at shelters and pet rescue organizations to move dogs slated for euthanasia from kill shelters to rescue, foster care and eventual adoption. Volunteers like me contribute many hours of personal time and incur substantial expenses to save such pets and help place them with carefully screened families that will care for them and receive invaluable companionship in return. What a waste it would be if those efforts were unintentionally impaired in any way!

Please consider my comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code as follows:

**Section 21.14 Kennel Licensure Provisions**

(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

The partnership between pet rescue organizations and the volunteer individuals that provide foster homes for pets under their supervision has proven to be an effective and humane solution for homeless pets. Volunteer fosters should not be classified with or subjected to the same licensure requirements as kennels, commercial breeders, etc. Exempting them is very much in the public interests and that of the rescued pets.

Dogs that are placed in foster care are kept in a home environment just like owned dogs. Time spent in such an environment socializes the dogs and makes them more adoptable at no cost to the public. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. If foster homes are subjected to the licensure requirements as currently proposed in the draft regulations, it would make participation for many volunteer foster care providers cost prohibitive, and that would cripple reputable rescue operations and result in the needless death of countless adoptable dogs.

As I understand it, the purpose of the revised regulations was supposed to be to better regulate living conditions for the animals raised in commercial breeders—commonly referred to as puppy mills—and other breeding facilities. Extending the regulations to include all volunteer non-kennel based rescues and foster homes will not support that goal and would be a devastating impact on a proven volunteer rescue network that is effectively placing tens of thousands of homeless pets with good families every year in Pennsylvania and across the United States.

In addition to the exemption for rescues and fosters, it would be very helpful to animal welfare for the proposed regulations to limit the number of puppies that can be produced each year by the commercial breeders, and impose strict fines if they do not comply. The proposed regulations should address the seemingly endless production of animals by the commercial breeders, while millions of homeless pets are being euthanized. Allowing this production to continue unchecked and unregulated will necessitate the continued and heartbreaking destruction of animals by shelters all across the Commonwealth.

Many thanks for your careful consideration of my comments; I welcome your response and would be happy to provide you with any additional commentary that you would find helpful.

Very truly yours,



Gary V. Hoover  
Central PA Volunteer Pet Rescue Driver

cc:

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

The Honorable Edward G. Rendell  
Governor of Pennsylvania  
225 Main Capitol Building  
Harrisburg, PA 17120