

Gelnett, Wanda B.

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From: Katy [katy62@comcast.net]
Sent: Thursday, March 15, 2007 7:55 PM
To: IRRC
Subject: Proposed New Kennel Regulations

2007 MAR 16 AM 7:41

INDEPENDENT REGULATORY
REVIEW COMMISSION

High Wycombe Farms Kennel
RR 1, Box 275 D
Pittston, PA 18643

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>
>Bureau of Dog Law Enforcement
>Attn: Ms. Mary Bender
>Pennsylvania Department of Agriculture
>2301 North Cameron Street
>Harrisburg, PA 17110-9408
>
>Dear Ms. Bender:
>
>Having purchased dogs from wonderful, ethical, breeders, and boarded
>them
in clean, air conditioned/heated boarding kennels, pet sitting services, owned and
operated by animal loving, ethical professionals, I feel compelled to voice my opinion.
>
>Although, perhaps, well intentioned, the proposed amendments of
>December
16, 2006 to the Pennsylvania Dog Law Regulations greatly concern me.
>
>I am in total agreement, that inhumane and substandard kennel
>conditions
should not be tolerated; and that "puppy mills" currently operating under those deplorable
conditions should be closed. I emphatically disagree, however, with the proposed
regulatory changes because they will target those boarding and or breeding kennels, as
well as rescue leagues, already in compliance with current legislation.
>
>I believe these changes are impractical, entirely too prescriptive,
>will
create a great burden from a financial standpoint, will not be enforceable and, most
importantly, will not improve the quality of the lives of the dogs entrusted to the
aforementioned, ethical breeders and boarding kennels and other pet centered businesses.
>
>Have you given any consideration as to where all the "confiscated dogs"
>in
your proposed amendments will be taken? Are you building many new
facilities in which to house them? If so, where will the money come from
to do so? Are they going to be built in compliance with these proposed
amendments? Who will staff them? Who will pay staff salaries? Or would you choose,
heaven forbid, euthanasia?
>
>These regulations (SS 21..21 Dog quarters, SS 21.23 Space, SS 21.24
Shelter, housing facilities and primary enclosures, to name a few,) will also require
wholesale renovation, if not rebuilding of many kennels already built in compliance with
current federal and/or state standards. Small,
>boarding kennels, and breeding facilities, whose care and conditions
>are
far superior to those required by the proposed new standards, would be unable to comply
with the rigid commercial kennel standards.
>
>These small breeders and boarding kennels would be forced out of
business, (your own estimates of between \$5,000 to \$20,000, and perhaps higher, to become
compliant attest to that) face a loss of income, and deprive their communities of their

outstanding services.

>

>Please consider changing the verbiage with regard to boarding kennels

>from

26 cumulative dogs, to 26 dogs at one time, which would serve to exempt the small boarding kennels who could least afford these very prescriptive changes.

>

>Common sense needs to prevail. "Throwing the baby out with the bath water" is not the answer.

>

>Please give a voice to the ethical, professional, small boarding and breeding kennels which are in compliance with current legislation, as well as the rescue leagues which will be negatively impacted.

>

>Please consider an exemption for them, rather than for the pet stores

>(as

presently stated in your proposed amendments) who are the very ones, in my opinion, who keep "puppy mills" in business!

>

>I strongly urge that this proposal be withdrawn.

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Sincerely,

Gloria E Treen, Partner

Katy M. O'Hora

High Wycombe Kennels

<http://www.highwycombekennels.com>