

Kathy Cooper

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From: Katy [katy62@comcast.net]
Sent: Friday, March 16, 2007 7:51 PM
To: IRRC
Subject: Proposed Amendments to Dog Law Legislation

2007 MAR 19 AM 11:39

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Representative:

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 small boarding and or breeding kennels, as well as rescue leagues, pet sitters and many other dog-centric business, 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.

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

Common sense should 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.

I respectfully suggest than any kennel meeting the following criteria be exempt or grand fathered:

1. Have been in business for a minimum of five years; and have never received a citation or written complaint.
2. Cannot accommodate more than 26 dogs at one time.
3. Can obtain a minimum of ten sworn affidavits from clients attesting to the

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kennel's ethical, clean, temperature controlled, dog loving standards.

4. Can obtain at least one veterinarian's approval.

With the above comments in mind, I strongly urge that this proposal be withdrawn.

Sincerely,

Katy M. O'Hora

High Wycombe Kennels
<http://www.highwycombekennels.com>