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

RECEIVED

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Dear Ms. Bender:

I submit the following comments on the Proposed Amendments to the Pennsylvania Dog Law Regulations at Title 7 of the Pennsylvania Code.

Section 21.14 Kennel Licensure Provisions

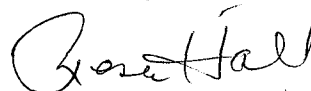
(a)(3)(ii) This section would group kennels, commercial breeders, rescue organizations, and foster homes together and subject them to the same requirements.

This provision is unreasonable as it applies to foster homes that are utilized by all volunteer rescue organizations. Dogs that are placed in foster care are kept in a home environment just like owned dogs. It is the home environment that allows dogs rescued from a kennel environment the training and socialization that they will need to be placed in a home with a family. As shelters move toward non-kill, the overflow is often housed with foster parents. To deny this will cause the unnecessary euthanasia of many these dogs. It is unreasonable to hold a home situation to the same standards as a commercial kennel or breeding facility. It would not be in the best interest of the animals to require the foster homes to place animals in a kennel environment instead of allowing them to live inside a home, and it is my understanding the goal of these regulation changes are to better living conditions, not cause more deaths! The foster system is privately funded and provides no cost to the state or taxpayers.

For example, assume there are 100 foster home-based rescue groups across Pennsylvania, each GROUP handling 1,000 animals per year.(10 dogs per foster home per year) If rescues were to close, that is 100,000 animals that would be placed into the system for municipalities and shelters to handle in an already overburdened system. This does not benefit anyone.

In addition to the exemption for rescues, the proposed regulations should put a clear limit on the number of puppies that can be produced each year by the commercial breeders, and strict fines imposed if they do not comply. The proposed regulations do nothing to stop the endless production of animals by the commercial breeders and penalize the dedicated hobby breeder. The enforcement of existing regulations is the easiest answer to the puppy mill problem, but if action must be taken, please consider the above concerns.

Respectfully submitted,



Renee Hall
Bethlehem, PA

cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, PA 17120