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My name is Gail Cayce-Adams. I am 37 years old and I live in York County with my husband and three young children. I work for the Department of Defense as a Computer Scientist and I also operate a K1 Pennsylvania licensed dog kennel. I am very involved in the world of pure breed dogs. I raise, train, show and breed Labrador Retrievers. This is my hobby, not my source of income, but it is something that I enjoy very much. It is a passion for me as well as a family activity that we all enjoy participating in. My children are very active with the dogs and often accompany me to dog shows. My oldest child is 11 and has started to show dogs also. It is teaching her that working hard toward a goal has many rewards. Also, she has learned compassion for other living creatures, perseverance and it is instilling a strong work ethic in her. Operating a kennel, no matter how large or small, is hard work when done properly and I enjoy watching my daughter learn about hard work and responsibility by helping out with the care of our dogs.

I am writing this letter because I am very concerned about the proposed changes to the PA Dog Law Regulations issued on December 16th, 2006. I believe that many of these new regulations will have a very negative and unnecessary effect on small breeders such as myself. I also believe that if these new regulations are imposed on small breeders, they could actually have the opposite effect and cause the dogs to get less attention and have a lower quality of life than what they are now enjoying. One example of this would be the fact that my dogs enjoy quality time with my family inside of our home. They are primarily housed in the kennel, but each dog gets to come in and enjoy time with us as well. I like to be able to bring the Moms into my home to whelp their puppies where I can observe them closely and offer assistance if needed. I also like to let the Mother and puppies remain in the house until I feel the puppies are out of the danger zone. This is often several weeks. I am very proud to say that I have never lost a puppy from a litter that I raised in this way. I came close once because a young, inexperienced mother laid on a puppy and suffocated it, but I found it within minutes because they were in my home and I actually performed mouth to mouth resuscitation on the puppy and was able to get it breathing again and the puppy survived. The fact that I was able to save that puppy is one of my proudest moments. If the litter had been in the kennel, the puppy would have died because there would not have been anyone there to notice it was in trouble. In the proposed regulation changes, it does not sound like there will be any chance for me to raise litters in my home, not even temporarily. There is a lot of talk about gutters and drains and slopes in the floor, but nothing concerning this type of human and canine interaction which dogs thrive on. I am very afraid that I will no longer be able to share this close bond and interaction with my dogs if these changes are made.

I agree wholeheartedly that inhumane treatment and substandard kennel conditions should not be tolerated, but I believe that these changes are not taking the small breeder into consideration. Most small breeders provide care that is above and beyond anything that the state requires, but can they meet these kennel requirements without significant financial hardship or undue burden? Probably not. I have heard it said by those involved with trying to make these changes to the dog law that it will only affect kennels that house more than 26 dogs like that is some magical number that separates large and small breeders. That is absolutely not the case. When you have dogs such as Labradors, you could easily only have 2 dogs housed on your property for the entire year and require a kennel license. I have had litters of twelve Labrador puppies on several occasions. If I had two bitches and each had a litter of twelve, I am required to be licensed by the state of PA. Does that mean I am not a small breeder? I would only own 2 dogs year round, and I would temporarily house 2 litters of puppies, but

I would be required to have a license and submit to all of these overly burdensome kennel requirements.

Obviously, these proposed changes were written with large kennels in mind, and if they are implemented, these large breeders should be the only ones that are required to comply with them. I do not believe that a K1 kennel should need to comply with these new regulations. Even when considering the regulations as they would be applied to large kennels, I still have issues.

These regulations will require complete renovations or rebuilding of a huge percentage of kennels which currently meet state and federal guidelines based on what appears to be someone's whim. There is no scientific foundation for the arbitrary, rigid engineering standards specified. Specifically, why is it necessary to have a gutter placed exactly between the indoor and outdoor run of a kennel that has both types of runs? Why could the gutter not be located at the end of a run if it is already there? Would the kennel owner be required to install a gutter exactly where these regulations state for an apparently arbitrary reason? Another issue is the requirement for the housing facility to be equipped to provide potable water. The statement in the proposed regulation is very vague, but I assume this means that there has to be running water in the kennel. I use a hose attached to a spigot outside of my house. Is that not good enough? If not, why? Also, why is it required that a washing facility be provided for animal caretakers, which is readily accessible and, where dogs are housed in an indoor facility, shall be accessible in the housing facility? My kennel is located on the same property as my house. Is it not reasonable to assume that I can use the washing facilities in my home? In addition, the requirement to remove the dog from its pen while it is being cleaned and then not return the dog to the pen until it is dry is unrealistic. Will every kennel be required to have 2 pens for each dog? According to this requirement – yes. And the result of that will be that the pen sizes will be smaller to accommodate this. This is not an improvement for the dogs. In a small kennel like mine, my dogs have large, oversized pens where they have lots of room to move around. This requirement would force me to cut the pens in half so that I would have a holding area for the dogs while I cleaned their pen and waited for it to dry. This is not an improvement for them.

In addition, what is the purpose of requiring an indoor kennel building to include ground level ventilation to assure dry kennel run floors during cold weather when these same proposed regulations require the indoor kennel building to be heated? If the building is heated, then why is ground level ventilation necessary? It seems to me that ground level ventilation will create drafts and make the kennel a less comfortable place for my dogs to be.

I also do not understand the purpose of forcing the dogs to be segregated by sex. I currently run my dogs together as long as the females are not in season. Maybe this is not appropriate for some breeds, but why make it a requirement for all? The same would apply for the requirements regarding animal size. If the breeds in question co-exist peacefully, why is this a requirement?

It also sounds like I would not be allowed to let my dogs run in my yard like I currently do. I do not understand the requirement of "no grass" in an exercise area. Under the new regulations, will my dogs only have the option of being in a concrete enclosure, or turned out in stone exercise pens. I do not see that as an improvement to their current situation. Currently, they enjoy running in groups with

me on our 200 acre farm. I take them out in groups of 4 or 5 and I ride a 4 wheeler and they run with me and love every minute of it. It does not sound like this will be an acceptable form of exercise under the new regulations. My only options will be a stone exercise pen or walking on a leash. If they are walked on a leash for exercise, would they be allowed to come into contact with dirt and grass, or would we have to make laps around their pen? What is the reason for this requirement for stone exercise pens? Worms and bacteria can get down into stone footing just as easily as they can get in dirt and grass. And I am not quite sure how you sanitize a stone exercise pen. This is another arbitrary rule that just does not make sense. And why would every other pet owner in PA be allowed to keep their dogs on grass, but if you have a kennel license, you will not be allowed to do so? Why is it o-kay in one situation, but not for another?

The record keeping requirements really make no sense to me. In a very large kennel, this would be a nightmare. And how does it improve the situation for the dogs? If someone was not actually feeding their dogs regularly, or cleaning their pens regularly, or exercising their dogs regularly, I am sure that they would not admit it. So, they would just fill out the records and the kennel inspectors would have no way of knowing whether the records were accurate and they would have no way of enforcing this requirement. This requirement is just a silly waste of everyone's time.

In every case of a problem kennel I have heard about in PA in recent years, it was never a case of, "if only there were more regulations, those poor dogs would have been o-kay". It is always a case of, "if only the current state regulations were being enforced, those poor dogs would have been o-kay". I firmly believe that to clean up PA's reputation as a puppy mill state, we need to enforce the current laws, shut down kennels that are not in compliance, not just slap their knuckles, and root out the unlicensed kennels and force them into compliance or shut them down. The Bureau of Dog law Enforcement needs to have enough wardens and enough money to be able to do these things. I can support changes that lead to that end, but not more regulations that will only punish my dogs and me for running a reputable kennel that is already following the rules or force us out of existence. If these regulation changes are made, small breeders like me who provide a pleasant life for the dogs and consider them to be part of the family will be forced to stop breeding or else start operating like a large commercial breeding facility where the dogs don't get a chance to get out and run and play and enjoy life and spend time with the family. They will be forced to live in concrete pens and stone exercise pens. Is this really an improvement in their quality of life? I have heard in the news just in the last few weeks about several kennels being shut down and charges being brought against kennel owners. These problem kennels were shut down under the current regulations, which proves that the rules and regulations as currently written work, they just need to be enforced. Please enforce the existing regulations, don't create more unnecessary and unenforceable regulations.

Sincerely,

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