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From: Rusty and Kristin Russell [rkrsemex@aol.com]
Sent: Monday, August 16, 2010 8:10 PM
To: IRRRC
Subject: Canine Health Board Regulations

Dear Ladies and Gentleman of the Independent Regulatory Review Commission,

I am writing to you to request that you dispense of the Canine Health Board's additional requirements that are scheduled to go into effect in July 2011. We are currently licensed as a commercial kennel. We were the first commercial kennel in our area to pass inspection under the new law. Our facilities were built in 2007 and met all the USDA regulations in place at that time. However the new Canine Health Board regulations will be so costly to meet that we will likely close or have to seriously downsize.

As I have read through some of the comments you have received thus far, it seems that many of those who are "anti-puppy mill" are really anti- dog breeders of any kind. They are also terribly misinformed. In our kennel and in the kennel that we work closely with in our area, cleaning is done every day. A raised floor is the ONLY way to keep a litter of puppies clean. You would literally have to clean every couple of hours to have puppies on a solid floor and keep them as clean and dry as a raised floor will. Further more it was commented by one person that the mother dog cleans up after the puppies. We bred Saint Bernards. They have very large litters of very large and fast growing puppies. By the time the puppies are 4 weeks the mother no longer cleans up after them. From 4-8 weeks of age it is nearly impossible to keep Saint Bernard puppies clean on concrete. No amount of cleaning and bedding can keep 10 puppies clean and dry if they are walking on a concrete floor.

Contrary to the emotion filled pleas of the animal "protectors" most breeders are loving people who consider their dogs to be their best friends as well as the future of their dog breeding business. Good sanitation practices, quality vet care and humane treatment are not only necessary to meet the law, but they are common business sense. Adding the strict requirements, such as humidity monitoring, ventilation systems designed and approved by an engineer and unsanitary solid flooring requirements will force honest, hard working, DOG LOVING breeders out of business and dishonest ones will go underground, where they will operate without any restrictions of the law.

Please keep in mind that while there are strong emotions on either side of these issues, you are regulating people. Do you really believe that the current law is not strong enough to protect dogs? Do you really want to side with the radical activists and make it nearly impossible to legally breed dogs in the state of Pennsylvania? Under the current law dogs and puppies are offered more protection and regulation than our children or senior citizens. I love my dogs and consider them to be a part of my family, but they are not humans. Please use wisdom as you decide how much further you are willing to allow the regulations to interfere in the lives and businesses of the tax paying, hard working, dog loving, dog breeders of this great State.

Thanks!
Kristin Russell
Blair County

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