

2785

From: Smith, James M.
Sent: Monday, August 16, 2010 3:51 PM
To: IRRC
Subject: FW: Please process my comments regarding the CHB proposed regs.

#2785

From: MainLineRescue@aol.com [mailto:MainLineRescue@aol.com]
Sent: Monday, August 16, 2010 3:32 PM
To: Smith, James M.
Subject: Fwd: Please process my comments regarding the CHB proposed regs.

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IRRC
2010 AUG 17 A 9:49

From: MainLineRescue@aol.com
To: jsmith@state.pa.us
Sent: 8/16/2010 3:03:05 P.M. Eastern Daylight Time
Subj: Please process my comments regarding the CHB proposed regs.

Sirs and Madams:

In deciding whether or not the proposed regulations should pass, please remember that it is not only the dogs that need to be protected, but the democratic process. The wishes of the people of Pennsylvania, as well as the entire General Assembly who passed Act 119, are being ignored. Since when can a regulation or policy "trump" a law. Act 119 clearly states that dogs over twelve weeks of age CANNOT be housed on anything but solid or slatted flooring - NO wire strand flooring of any kind. And while puppies under twelve weeks MAY be housed on wire flooring, adult dogs SHALL NOT be housed on anything but solid or slatted flooring. The Department of Agriculture will have the members of your esteemed board believe that the only way to ensure puppies are able to be with their mothers is to circumvent our new dog laws and allow commercial breeders to continue housing their pregnant and nursing dogs on 50% wire?? The solution to their "dilemma" is simple - house the puppies on solid flooring along with their mothers. Wire flooring is OPTIONAL for puppies; solid or slatted flooring is MANDATORY for adult dogs.

Act 119 also directs that high temperature, lighting, ventilation requirements be decided by the nine member panel of vets who comprise the Canine Health Board. The Department of Agriculture has basically gutted the proposed regulations set forth by the Canine Health Board and has forwarded this commission regulations of their own making. This is not only unacceptable, it is illegal. The members of the Independent Regulatory Review Commission should understand that any passage of any regulations not approved by the CHB will be challenged in the courts. Adding a section to the proposed regulations allowing breeders to use anything other than solid or slatted flooring for dogs over twelve weeks of age will be challenged in the courts. IRRC members should also know that members of Governor Rendell's staff have been contacted by vets sitting on the CHB expressing concern that their wishes were being ignored.

In a clear effort to accommodate the commercial breeders of Pennsylvania, Jessie Smith, Sue West, Brook Duer, Russell Redding, and Governor Rendell, himself, have taken our hard won new dog laws and destroyed almost every aspect of Act 119, that could, if properly enforced, improve living conditions for thousands of breeding dogs confined to these facilities. One can only speculate as to why the governor's staff and a few key advisors have suddenly turned their backs on these helpless animals. I am sure the reasons will become clear in time.

As far as air exchanges, the vets on the CHB wanted 100% fresh air. The Department has reduced this to 30% fresh air - 70% old air. This will create a convection oven. Dogs will die. The vets of the CHB agreed on the importance of windows - for dogs who do not have access to the outside (because of zoning restrictions). The Department feels it is okay for dogs to be trapped inside buildings for their entire lives and never see the outside - not even through a window. So strongly does Secretary Redding believe this, he has created a policy whereby dogs will be deprived of unfettered access to outside runs - also required under Act 119.

The Department of Ag and the Bureau of Dog Law is forever urging the citizens of Pennsylvania to buy dog licenses - after all, it is the law. Every year, I purchase licenses for my dogs even though I know the money is going to pay the salaries of people like Jessie Smith and Dick Hess. My ancient dogs are vaccinated every year for rabies. I do this, because it is the law. How disturbing that we're expected to do what's right and obey the law, while the officials at the Department of Agriculture allow other Pennsylvanians, namely the commercial breeders, to get away with not obeying the law. You have to ask yourself - what's in it for them?

Bill Smith
Main Line Animal Rescue

Main Line Animal Rescue has over 10,000 members and 400 active volunteers.