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From: Brownfield, Jill [jbrownfiel@state.pa.us] on behalf of AG, CHBcomments [CHBComments@state.pa.us]
Sent: Sunday, October 18, 2009 6:34 PM
To: dhain@pahouse.net; IRRRC; kebersole@pasen.gov; Kennedy, David C. (AG); Kerry Golden; MULLER, JENNIFER; Smith, Jessie L; Thall, Gregory (GC); wgevans@pasenate.com
Subject: FW: Pennsylvania Commercial Breeding Facilities

From: Donna L Gunia [mailto:donnagunia@verizon.net]
Sent: Tuesday, October 13, 2009 12:57 PM
To: AG, CHBcomments
Subject: Pennsylvania Commercial Breeding Facilities

RECEIVED
2009 OCT 19 AM 10:00
NEW JERSEY REGULATORY COMMISSION

To the Canine Health Board,
In a perfect world there would be no commercial breeders. That being said, I am writing to you to encourage strong regulations to insure that breeders use humane standards to end the suffering of man and woman's best friend.

I am respectfully requesting that you support the following:

Ventilation - Require commercial kennels to have a functional, mechanical ventilation system, and in an emergency, the kennel must have operable windows, skylights, etc.

When the temperature exceeds 85 degrees, this mechanical ventilation system must be used to reduced the temperature inside the kennel. This proposed regulation also requires breeders to monitor ammonia, carbon monoxide, and humidity levels, as well as requiring them to provide the dogs in their kennels with 8-20 air changes of 100% fresh air per hour in each room of the kennel where their dogs are housed. Many of the dogs in Pennsylvania's puppy mills have ulcers on their eyes from high ammonia levels; others suffer from heat exhaustion in the summer. This section of the proposed regulations will ensure that dogs in the larger commercial breeding kennels are provided with clean, fresh, breathable air.

Lighting - Require kennels to recognizes the needs for dogs in these facilities to have exposure to natural light - or at the very least, a mixture of natural and artificial light. Many of the dogs rescued from these facilities have spent their whole lives in darkness, so this is extremely important. Under the suggested guidelines, dogs are also protected from excessive light, and shaded area will be required in outside exercise areas.

Flooring - Require solid or "slatted" flooring is required. This regulation outlines specifics regarding drainage (no dog standing in urine, etc.), degree of sloping, and the materials that can be used (dogs should not be forced to stand on hot or cold metal flooring, for example.)

I would also suggest that a special tax be levied on the sales of dogs in Pennsylvania to pay for the enforcement and prosecution if the laws are broken.

Respectfully yours,
Donna L. Gunia

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