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**From:** Brownfield, Jill [jbrownfiel@state.pa.us] on behalf of AG, CHBcomments [CHBComments@state.pa.us]  
**Sent:** Tuesday, October 27, 2009 4:01 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: 2009 Canine Health Board comment ARQ  
**Attachments:** 2009 Canine Board Comment ARQ.pdf; ATT00001.htm

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**From:** Lucinda Schlaffer [mailto:lucy@arqarchitects.com]  
**Sent:** Monday, October 26, 2009 6:20 PM  
**To:** AG, CHBcomments  
**Subject:** 2009 Canine Health Board comment ARQ

To Secretary Smith,  
Please find attached some comments to the Canine Health Board Proposed Regulations, 7 PA. Code Chapter 28a.  
Respectfully submitted for consideration.

Sincerely,  
Lucinda Schlaffer

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INDUSTRIAL REGULATORY  
DEPARTMENT



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architects

October 26, 2009

Pennsylvania Department of Agriculture  
Bureau of Dog Law Enforcement  
2301 North Cameron Street,  
Room 102  
Harrisburg, PA 17110

Re: Canine Health Board Standards for Commercial Kennels – Proposed Regulations  
(7 PA Code, Chapter 28a)

Dear Secretary Smith:

As architects working nationally on animal care projects, we have witnessed a change over the last decade in housing constructed to benefit the health and well-being of dogs. Providing air, light and making good material selections are essential in the design of dog housing spaces whether a commercial kennel or shelter environment.

An animal's behavior is affected by his/her surroundings. When a dog is confined in a small space where he cannot turn without touching his nose and tail, he will exhibit negative behaviors such as pacing, jumping, digging and barking. It follows that in commercial kennels the design and construction of the housing itself is critical to breeding dogs that will be both physically and medically healthy. To that end, we support the inclusion of the natural light criteria, the ventilation rates identified and the use of solid flooring as part of the regulation of Commercial Kennel design. All three elements work together to provide a healthy space for dogs to thrive.

It is our standard of care to provide natural light as well as the ability to turn off artificial light to allow the animal to know day and night. It is widely agreed that lack of exposure to the diurnal cycle in humans contributes to increased sickness and stress in work settings where shifts make it difficult to experience the natural day/night cycle. Providing windows to allow natural light to enter dog areas supports this needed biological stimulus for healthy wake and rest periods over a 24-hour cycle. Daylighting is also a sustainable practice in allowing the sun to offset the amount of electrical lighting demand in space design. Ultra-violet rays from the sun naturally assist in deterring the growth of surface mold and bacteria.

Ventilation rates and minimizing recirculation of air greatly reduces airborne disease as well as removes odors from chemical products used for cleaning or from kennel area waste prior to regular clean up.

In our practice, we utilize solid flooring for all dog areas. We have concerns about wood products for flooring given they may splinter and should not be pressure-treated type wood. Sealed wood is more likely to deteriorate than the other products suggested as good flooring alternates. Any floor material that is going to experience water regularly during cleaning and should be smooth and impervious so that the surface can be easily cleaned and sanitized. Some products such as epoxy are durable enough for kennel use, but if a dog becomes stressed and starts to “dig” the epoxy top layer can be broken into and create a hole. Dense materials such as hard-troweled sealed concrete, terrazzo and porcelain tiles are particularly suitable as they are hard to destruct by a dog and easily cleaned. Utilizing non-slip coatings and textures provide sure footing.

In summary, we support the inclusion of the design standards to provide adequate light, air and solid floor surfacing in the regulation section Chapter 28a. These standards will contribute greatly to the health and well-being of dogs in the Commercial Kennel setting.

Sincerely,

Lucinda A Schlaffer, AIA, LEED AP

Partner- ARQ Architects

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