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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

October 5, 2009

Re: Temporary Guidelines for Commercial Kennels

Dear Secretary Smith:

As a very concerned Pennsylvania resident and happy owner of two lab mixes, I would like to respectfully submit the following comments **in support of the Department of Agriculture's proposed rulemaking regarding standards for commercial kennels**. The notice was published in the Pennsylvania Bulletin on September 12, 2009 (7 Pa.Code CHS. 28 and 28a).

The Bureau of Dog Law Enforcement within the Department of Agriculture is charged with implementing and enforcing the Dog Law, which was passed to ensure the humane care and treatment of dogs within the Commonwealth. In 2008, the Pennsylvania General Assembly passed significant amendments to the Dog Law and created the Canine Health Board to establish appropriate ventilation, humidity, ammonia, and lighting ranges for commercial kennels, as well as consider alternative flooring options to those set forth in the law. **The proposed regulations are the result of the Canine Health Board's recommendations for those standards.**

Ventilation:

The proposed regulations require that "ventilation be achieved through a mechanical system that will allow for 8 to 20 air changes per hour, keep consistent moderate humidity, keep the kennel from becoming too hot, keep ammonia levels and particulate matter low, and to keep odor minimized...". While I generally support these standards, a slightly higher minimum of 10 air changes per hour should be required in all animal spaces. As a result, I recommend that the required air changes per hour be changed to reflect this.

The proposed requirement that kennels use a mechanical ventilation system providing ventilation, heating, and cooling is an excellent idea that both the Department of Agriculture and the Canine Health Board can take credit for. Such a system is vital to ensure the health and comfort of dogs housed in kennel facilities.

Lighting:

The importance of exposure to natural light and a more normalized diurnal cycle for dogs housed in a kennel environment can not be understated. I fully support the lighting requirements proposed in these regulations.

Flooring:

I fully support the flooring requirements proposed in these regulations.

In Summary:

Based on my preceding comments, I fully support the proposed regulatory package presented by the Department of Agriculture and the Canine Health Board with the recommended changes, and support promulgation of the new regulations as swiftly as possible.

Thank you for your time and consideration regarding this very important matter.

Respectfully,

David Lee Marshall

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SPECIAL DEPUTY SECRETARY
FOR DOG LAW ENFORCEMENT