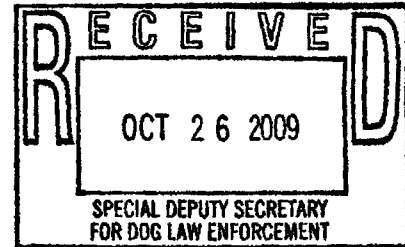


Canine Health Board
c/o Department of Agriculture
Bureau of Dog Law Enforcement
2301 North Cameron Street, Room 102
Harrisburg, PA 17110



Re: Regulation ID #2-170 (#2785) * "Canine Health Board Standards for Commercial Kennels"

Dear Board members / Department of Agriculture representatives,

The environmental criteria for the interior of kennels and primary enclosures proposed in these regulations are an excellent and necessary step toward improving the quality and care, of the dogs, and for their prospective recipients / buyers. I fully support these standards as an end-product but have some concerns regarding their implementation. My comments are as follows:

- 1) The temperature and relative humidity requirements noted can not be maintained throughout much of Pennsylvania during many times of the year, by means which are, "very basic, such as an exhaust fan" (definitions). When the outside ambient air is 90-95 degrees F. +/- and 75-85% + relative humidity, a fan alone will almost certainly not keep the indoor environment of an enclosure, "occupied" or not, within the stated temperature and humidity criteria (Section 28a.2. 1,2&3). And conversely, when the outside ambient air is 15-25 degrees F. +/- and the enclosure is being heated, a fan alone will work against the heating system, and exacerbate any particulate matter issues (Sections 28. a.2. 4,7&10). I believe the kennel operators need be required to submit, install and maintain comprehensive Heating Cooling and Ventilating system, recommended by a licensed engineer, which addresses these unavoidable conditions.
- 2) The Diurnal cycle of full spectrum light requirements noted (Section 28a.3. 2i, 2ii, 2iii & 2iiii) can not be met without a continuous and reliable source of power. I believe the kennel operators need be required to submit, install and maintain such a system.
- 3) While items #1 and #2 above will address the ability of these facilities to meet the proposed regulations, accurate monitoring, as it is currently done, will be difficult. I believe the kennel owners need be required to submit, install and maintain a mechanized, automatic environmental monitoring system, which documents continuous ongoing air quality in the facility. This documentation shall be submitted to the Bureau of Dog Law Enforcement, at a minimum schedule coinciding with the current, or proposed, inspections. Installation and operation of these systems are relatively common and inexpensive (as evidenced by the nursery / greenhouse industry which have very similar environment criteria to monitor), and will circumvent much of the potential labor and cost to the Bureau and local municipalities while insuring compliance.

Again, I applaud the Bureau's attention to the issues surrounding the kennel industry and believe that the proposed regulations need be adopted as minimum standards. My comments are offered in an attempt to strengthen, insure and simplify the implementation of same while easing the burden /cost of doing so, (or not) to the dogs and the public.

Sincerely, Brian Longenecker, R.A. (#RA011860X)

A handwritten signature in black ink, appearing to read "Brian Longenecker". The signature is fluid and cursive, written over the typed name.