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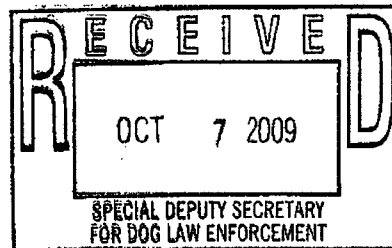
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October 5, 2009

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

2009 OCT 23 AM 9:47

INDEPENDENT REGULATORY
REVIEW COMMISSION



Re: Temporary Guidelines for Commercial Kennels

Dear Secretary Smith:

As a concerned Pennsylvania resident, I 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).

I do sincerely believe that in order to respect ourselves as people we MUST show concern for those animals in our care and in the care of breeding kennels. I do approve any proposal the Canine Health Board has put forward to establish appropriate ventilation, humidity, ammonia, and lighting ranges for commercial kennels, as well as to 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.

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 generally I support these standards, it is well established that a 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 standard.

I commend the Department of Agriculture and the Canine Health Board for proposing a requirement that kennels use a mechanical ventilation system that provides ventilation, heating, and cooling. Such a system is imperative to ensure the health and comfort of dogs housed in kennel facilities.

Lighting:

I commend the Department of Agriculture and the Canine Health Board for acknowledging the importance of exposure to natural light and a diurnal cycle for dogs housed in a kennel environment. I fully support the lighting requirements proposed in these regulations.

Flooring:

I fully support the flooring requirements proposed in these regulations.

Based on the foregoing comments, I fully support the proposed regulatory package presented by the Department of Agriculture and the Canine Health Board with the recommended changes, and encourage promulgation of the new regulations as expeditiously as possible. Thank you for your time and consideration. Please do not allow puppies to languish in unsanitary conditions.

Sincerely,

Helen McFie Simone

Helen McFie Simone, PhD.
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