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October 2, 2009

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Re: Temporary Guidelines for Commercial Kennels

Dear Secretary Smith:

As a concerned Pennsylvania citizen and voter, I respectfully submit the following comments in support of the Department of Agriculture's proposed rule making regarding standards for commercial kennels. The notice was published in the Pennsylvania Bulletin on September 12, 2009 (7 PA.Code CHS. 28 and 28a).

Background:

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 in 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 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.

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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.

Conclusion:

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. These seem like *HUMANE* considerations and it is the **RIGHT THING TO DO!!!**

Sincerely,



Mrs. Karen Rose
Philadelphia, PA