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Concerning the Canine Health Board and the matter of Ventilation in commercial kennels:

As a long time breeder of quality dogs and also as a commercial Kennel owner who is in complete compliance with the new Pennsylvania State laws. I submit the following on the Canine Health Boards current findings.

The CHB addressed ventilation as if it only relates to INDOOR facilities. ACT 119 requires the OUTSIDE exercise area. The dogs will go outside. The majority of the feces will be outside. The majority of the urine will be outside.

The REAL point that seems to be being overlooked IS that ACT 119 changes all of the old ways. With the new law in effect... having all commercial kennels charged with having their dogs on solid flooring (no more wire cages) AND having them have unfettered access to the outside for exercise. The BIG issue being overlooked is that AIR exchange or ventilation WAS a problem for kennels in the OLD way that they were allowed to do things. As wardens would go into a kennel that was a building that housed dogs—on wire.... allowing them to urinate and defecate through the wire... and ALL the smell stayed INSIDE the building.... which most DEFINITELY caused ventilation problems.... I have been in kennels such as these that overwhelmed the nose with the smell of URINE and DISINFECTANT —because ventilation was not adequate by any means.

What I have seen unfold is somewhat a lack of COMMON SENSE where this is concerned. In getting very technical—with "meters" to measure air exchange in kennels... that seems to ME to be overkill and unenforceable —charging wardens with calibration of this equipment as well as having kennel owners having the same equipment—something many wardens tell me is going to be a nightmare for them to do. I have been assured that this equipment will not be expensive or hard to use. However all the data I have collected on it says just the opposite—it WILL be expensive.... hard to keep calibrated.. and hard to use.

I see the REASON why ventilation WAS a concern.

However as the new law goes into effect—the two things IN STONE in the law— the flooring and outside exercise are going to take care of the ventilation problem. Dogs — if left with a place to eat and sleep and get warm and get cool (the INSIDE of their enclosure) and a place to go outside for exercise AND to urinate and defecate—WILL go OUTSIDE... in fact they will go as far away as they can from their "sleeping" and "living quarters" to do this... with RARE exceptions.. It will then be the kennel owners responsibility to clean up the OUTSIDE enclosure and of course keep the inside clean also. I have ALWAYS raised my dogs like this.... because I WANTED TO —not because of the law. and I can tell you this is a FACT... not something I made up.. I ask you look to "Boarding" kennels—which do not fall under this law.... but look at how they have an "inside" place for the dogs.... and an "outside" run. most of them.... Very few I have been in HAVE a ventilation problem... as the dogs go outside to do their business.... In MY kennel... the most you will smell is on a rainy day—you might get a wiff of "wet dog" but you will NOT smell the ammonia that comes with urine buildup... I use ceiling fans to circulate air 365 days a year.... PLUS the dogs going in and out the dog doors allows good air exchange.

As the commercial kennel Dog Law advisory Board member.... I can tell you —for the LARGE kennels previously in operation in this state.... those that housed 100 to 500 dogs in one building.. ventilation ASIDE.... the flooring and outside access rules are either putting them out of business or making them GREATLY reduce the amount of dogs they can raise and conform to the law. What is going to remain in Pennsylvania when the dust settles on this law... are those who were willing to make these changes.... and realize that "business as usual" is over. There will be

very few kennels still in operation with HUNDREDS of dogs in this state and if they DO exist then their dogs are going to have to be able to go OUTSIDE when they want to... which makes this ventilation issue more or less a NON issue...

I was going to bring to the attention of the parties concerned that nursing homes etc... do not require this many air exchanges... I knew however that the "counter" on that would be the sanitary conditions are not the same for human beings--having access to bathrooms etc. I submit to you that the NEW requirements for kennels DO now provide for an actual "bathroom" for the dogs. I implore the CHB to ASK the dog wardens who currently inspect kennels that already have the new regulations in place (for flooring and outside access) if what I am saying is not absolute fact. The current proposed regulation will force 8 to 20 air exchanges when they are NOT needed.

The new law was enacted to "raise the bar" on commercial kennels in this state. To stop Pennsylvania from being labeled the "puppy mill capitol of the east" and it has ACHIEVED that goal. I respectfully submit that the Canine Health Board--made up of Veterinarians--with NO input from GOOD dog breeders--may be well meaning... but they overreach on this "ventilation" issue. Making rules that are unenforceable... and in the end in almost ALL cases not at all necessary. A GOOD dog warden--upon inspecting the commercial kennels that have complied with the new law--or those that were already IN compliance... would be able to KNOW upon entering the building if the ventilation was adequate, without complicated equipment to aid them.

Respectfully Submitted,
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cc: IRRC, interested parties