

IRRC Chairman Arthur Coccodrilli  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

# 2785

October 23<sup>rd</sup>, 2009

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Dear IRRC Chairman Coccodrilli,

As we all endeavor to protect our animals and create the healthiest and safe environment for them, it is necessary to look at the proposed changes to the regulations. Section 28a of the proposed Canine Health Board Standards is creating unnecessary financial stress on dog breeders and kennel owners. Please consider the following items that hopefully will convince you to vote against these proposals.

Under the ventilation points, the proposed standard is to implement mechanical ventilation if temperatures exceed 85 degrees. However, the fact is that newborn puppies cannot maintain their own body temperatures and require supplemental heat sources to create an air temperature between 90 and 96 degrees. Puppies would die of hypothermia if this law were to pass and obeyed!

If a kennel owner were to be required to create natural lighting as proposed by this change, the owner could have an approximate expenditure of \$32,000 for architectural design, zoning permitting and inspections, window and installation costs, and glazing of windows for diffraction of direct sunlight. This proposed requirement far exceeds anything necessary for the health and welfare of the animals housed in the facility.

Requiring lighting in an animal facility to be 50 to 80 foot candles is ridiculous when lighting in the average home is only 12 to 20 foot candles and even commercial properties are 15 to 30 foot candles. Actually requiring that high intensity lighting in a dog facility is inhumane!

Please vote against these proposals which are unnecessary and in some cases inhumane to the animals that would be affected! Thank you for your time and efforts in evaluating these proposals.

Truly yours;



David Stoltzfus  
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