

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

2785

October 23, 2009

Dear IRRC Chairman Coccodrilli,

I would like to call your attention to the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I have great concerns that these proposals could cause what are presently well maintained kennels to create unsafe conditions. Please note the following concerns.

In another part of the proposed standards is the requirement for Natural Lighting. The proposed requirements could cause an expenditure of over \$32,000 for a facility of 40' x 100' for architectural design, zoning permitting and inspections window and installation costs, and glazing of windows for diffraction of direct sunlight. This requirement far exceeds the necessary lighting for healthy animals!

Under Section 28a.3, requiring lighting in a kennel to be between 50 – 80 foot candles would be harmful to animals exposed to this high intensity. A typical home is between 12 – 20 foot candles and commercial properties are between 15 to 30 foot candles. Forcing dogs to endure this intensity of lighting would be inhumane. The proposal also calls for lighting to be 50 to 80 foot candles during the day and 1 – 5 foot candles on a night cycle. After researching the cost to achieve this level of lighting with a diurnal light cycle, I believe the costs could be over \$18,500. Besides the inhumanity to animals, the exorbitant cost may cause good kennels and breeders to give up their businesses.

Drafts in a kennel are a great concern and a Federal Law mandates that dogs be protected from drafts in the primary enclosure. However Section 28a.2 dealing with ventilation actually requires 8 – 20 air changes. This would be excessive and could cause excessive drafts in the enclosure. For example, in a building 40' x 100', if there were even 10 air changes it would require 5300 cubic feet of air per minute to be pushed through the building. This would most certainly cause drafting.

As you can see, there are great concerns pertaining to these proposals. They are vague, create high expenditures for unnecessary changes, and actually can cause unsafe and unhealthy conditions in kennels. Please vote "NO" to these proposals.

Sincerely,

David Zimmerman Jr.

David Zimmerman Jr.
360 Peach Rd
Ephrata, PA 17522