

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

#2785

RECEIVED
OCT 21 2009
COMMUNICATIONS SECTION

October 21, 2009

Dear IRRC Chairman Coccodrilli,

Please consider voting "NO" to the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that the demands of these regulations are unnecessary for the maintenance of a successful, healthy, and safe kennel. Many of these regulations will cause great expenditures to kennel owners and in today's economy may put well maintained kennels out of business.

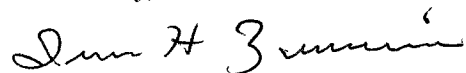
Under Section 28a.3, requiring lighting in a kennel to be between 50 – 80 foot candles would be harmful to animals exposed to this high intensity. A typical home is between 12 – 20 foot candles and commercial properties are between 15 to 30 foot candles. Forcing dogs to endure this intensity of lighting 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.

I believe that in Section 28a.2 the requirement to ensure that particulate matter form such as dander, hair and food is below 10 milligrams per meter cubed is unrealistic. All dog breeders know that puppies love to play in their bedding which is typically wood shavings or shredded paper. It would be impossible to meet the strict requirements of less than 10 milligrams per meter cubed. Again, this is unnecessary stress on owners,

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!

Consideration of these proposed changes is necessary because I believe that the cost expenditures and the safety and health of our animals is in jeopardy. Please vote "NO" to these proposals!

Sincerely,



Irvin Zimmerman
769 Red Run Road
New Holland, PA 17557