

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

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Dear IRRC Chairman Coccodrilli,

Please consider the following concerns I have with the proposed Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that many of the suggested changes, although well intended, are extremely difficult, if not impossible, to achieve. These unnecessary requirements would cause expenditures that in some cases may close viable and well-maintained facilities.

In Section 28a.2, the proposal requires facilities to have between 8 - 20 air changes of 100% fresh air per hour in each room. This would require a facility of 40' x 100' to push 5,300 cubic feet per minute through the facility. After investigating needs and costs, I believe this would cost a kennel owner to spend approximately \$118,000 to bring their facility to code and then spend approximately \$34,000 in additional costs to operate the equipment. The reality of this proposed regulation is that it violates the Federal Law covering Animal Welfare mandating that dogs must be protected from drafts in their primary enclosure. Please consider this negative factor and consider voting against this proposal.

I also 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 Section 28a.4 it is stated that "Solid flooring must be sloped to a drain that is free of debris." Again this is an unrealistic requirement. Pennsylvania's Bio Security Labs and USA's licensed inspected research labs would all fall these exorbitant and unreasonable standards set by these proposals! I do not believe these requirements are scientifically based and the Department has exceeded its authority.

Please vote against these proposals as they are unrealistic and financially exorbitant for kennel owners and breeders who are already running well maintained facilities. Thank you for your time and efforts in examining these proposals and considering my concerns.

Best regards,



Sugar Creek Kennel
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Logantown, PA 17747