

2785

Edwin & Erla Martin
865 Davis Road
Millmont, PA 17845-9703

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

October 23, 2009.

Dear IRRC Chairman Coccodrilli,

I am an individual who is very concerned about the proposed changes to Section 28a of the Canine Health Board Standards for Commercial Kennels. I believe that some of the requirements exceed the necessary standards for running a successful and healthy kennel. Some of the proposed regulations are so excessive they would involve great expenditure and in some cases, require well maintained kennels to close their doors. I hope you will consider my concerns and vote against these proposals.

The requirement for what is referred to as proper ventilation would require breeders and owners to have 8 - 20 air changes of 100% fresh air per hour in each room of a facility that houses dogs. In order to achieve this level of ventilation, an owner would have to spend approximately \$118,000 to install the needed equipment. Then approximately an additional \$35,000 would be needed to fuel and maintain this additional equipment. These expenditures are outrageous and would in some cases put kennel owners out of business!

Additionally the economic impact of bringing a facility up to the required lighting proposals is excessive. As an example, on a 40' x 100' facility for the purchase of light fixture units, installation, circuit panel, and additional circuit breaker installation, electrical engineering design, zoning permitting, and inspections, full spectrum fluorescent tubes and shipping plus having a diurnal light cycle for day and night would cost over \$18,500! This type of expenditure would be impossible for some owners plus the proposed 50 to 80 foot candle intensity would be harmful to the animals!

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!

Please consider these comments and vote against the proposed requirements. Although we all want the healthiest and safest conditions for our animals, we also must consider the costs of excessive requirements. Thank you for your time and consideration.

Truly yours,

Edwin Martin
Erla Martin