



# Pennsylvania State Grange

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November 10, 2009

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> floor  
Harrisburg, PA 17101

RE: Proposed rulemaking by Pennsylvania Department of Agriculture and Canine Health Board governing standards for commercial kennels [Regulation ID #2-170 (#2785), published in the September 12, 2009 Pennsylvania Bulletin]

Dear Chairman Coccodrilli:

I am writing on behalf of 13,000 members of the Pennsylvania State Grange to comment on the proposed rulemaking on standards for commercial kennels. The Pennsylvania State Grange is a family fraternal organization dedicated to the betterment of rural American through community service, education, legislation and fellowship.

The Grange is concerned that the proposed health standards will force most small dog breeders in the state out of business because of cost of compliance. Small breeders may show more care, personal attention, and socialization to their dogs than large kennels who can afford to make all the environmental alterations to meet the standards. Sixty dogs sold in a year is not many considering that some breeds normally have litters of ten puppies. Breeders who do not expect to sell 60 dogs may find themselves in violation if one dog has a larger than expected litter.

Today's economic climate makes it difficult for most small businesses to survive. Mandating these excessive regulations will force many kennels out of business, losing their livelihood, rather than expend thousands of dollars to comply with these requirements which are not based on science.

Kennels are often a supplemental business on a family farm. Pennsylvania's farm families are struggling to maintain their farms in the economic downturn. Forcing them to give up this source of supplemental income will make it even more difficult for our farmers to remain economically viable.

Mr. A. Coccodrilli  
November 10, 2009  
Page 2

Loss of these small businesses will cause loss of income to the Commonwealth in sales and income taxes as well as all income from associated businesses and sales. More staff and equipment will be required in the Department of Agriculture to monitor and enforce the regulations. With fewer licensed kennels and more work for enforcement, the Office of Dog Law will no longer be self-supporting from license fees.

“One size fits all” regulations will not work for all the various breeds of dogs. Some breeds cannot thrive in heated environments; some develop problems living on concrete; some need more space to exercise than others. Different types of dogs should be considered when formulating regulations.

The excessive lighting requirements will be detrimental to the animal’s health rather than beneficial. If lighting must be required, it should be based on sound scientific evidence.

Thank you for the opportunity to express the views of the Pennsylvania State Grange membership on these proposed rules. We hope that you will oppose the proposed rulemaking as excessive and unnecessary.

Sincerely,

A handwritten signature in cursive script that reads "Betsy E. Huber".

Betsy E. Huber  
President