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KENNEL CLUBSM

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January 27, 2021

Mr. Benjamin Lee, Chairman, Legislative & Rules Committee
The Stamford Board of Representatives
Stamford Government Center
888 Washington Boulevard, 4th Floor
Stamford, Connecticut 06901

RE: Potential Amendments to §111-6 of the Code of Ordinances, Item No. LR30.103

Dear Chair Lee and Members of the Legislative & Rules Committee:

As you may know, the American Kennel Club (AKC) was established in 1884 and promotes the study, breeding, exhibiting, and advancement of purebred dogs. AKC is the world's largest not-for-profit purebred dog registry, and represents over 5,100 dog clubs nationally, including 57 in Connecticut. We advocate for the purebred dog as a family companion, advance canine health and well-being, protect the rights of dog owners, and promote the ideals of responsible dog ownership. The AKC supports reasonable and enforceable laws that protect the welfare and health of purebred dogs and do not restrict the rights of breeders and owners who meet their responsibilities.

The American Kennel Club strongly believes no dog should ever be left in a dangerous situation. No one wants to see a dog in distress, but there are factors that must be considered to ensure an effective law that truly protects all dogs. Thank you for requesting AKC's suggestions on the proposed §111-6 draft (the draft).

I. Tethering Prohibited: Dogs should never be tethered in a manner that could cause harm to them. However, the draft generalizes the prohibited use of a tether under the proposed definitions of "adequate shelter" and "adequate space for a dog", which is problematic. Tethering is a practical and humane method for training and restraining dogs in a variety of circumstances. Tethering is a common and responsible way to restrain dogs that do not respond well to other restraints (such as escape artists) or participate in activities that require acclimatization such as hunting, sledding, or other obedience and performance events. Tethering may also be a responsible and appropriate option for handling dogs, working as service dogs (like seeing eye dogs), dogs in training, and dogs that are being groomed or examined on a table. The city of Stamford appears to have multiple animal grooming businesses within its district. The American Kennel Club opposes arbitrary restrictions on tethering, which can undermine the wellbeing of dogs, responsible dog ownership, and safe training and recreational activities.

Recommendation: Strike the tethering text included in the proposed definitions of "adequate shelter" and "adequate space". Under section B referring to "Control of dogs", add a new subsection stating, "(8) No owner/keeper of any dog shall leave it without adequate shelter, adequate space or in conditions where the health and safety of the dog is at risk". Also, include in the tethering section of the draft a specific reference to [Connecticut General Statutes Section 22-350a](#), which details when tethering a dog would not meet the proposed draft's "adequate shelter" or "adequate space" definition requirements. but, would be absolutely appropriate and allowed under state law.

II. Providing Adequate Shelter: When developing language protecting dogs in inclement weather, it is important to remember that dogs come in all shapes, varieties, and sizes, with characteristics that make them unique. No dog should be left in unsafe conditions; however, it should be noted that dogs are the most diverse species of animals. What is ideal for a Chihuahua is very different than the needs and tolerances of a Saint Bernard. There are a number of factors that impact a dog's ability to handle weather, including breed, age, and its general health.

While specific temperature language is easy to enforce, such guidelines inadvertently put some dogs at risk. It could legalize temperatures that a dog may not be able to tolerate even for a short period of time, yet an owner could believe it is safe since the law would allow it. Moreover, many dog breeds participate in activities such as hunting, search and rescue, sledding, herding, obedience and agility events, and other activities that require dogs to be trained and acclimated to the weather in order to perform safely. For example, the Stamford Police department has a [K-9 unit](#) that, among other duties, tracks criminals and missing persons. Acclimation allows these dogs to adjust to conditions before beginning their activities. Bills using absolute temperature language do not allow for these activities and may prevent dogs from being trained or participating in these important functions during weather emergencies.

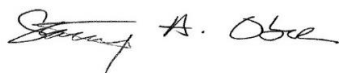
Recommendation: Rather than insert specific temperatures and a list of exceptions to the proposed definition of "adequate shelter," AKC recommends stating that "no dog shall be left in conditions where the health and safety of the dog is at risk." This enables animal control to protect all dogs – including those that simply could not handle the extremes of an absolute temperature standard due to their breed, age, or general health. This language also limits the need for exemptions for dogs that are with the owner, or training or working in conditions that are suitable for the breed, age, and general health of the dog.

III. Providing Adequate Space: Again, what qualifies as adequate space for one breed of dog varies greatly from another breed of dog. The draft proposes a definition of "adequate space" that includes tethering restrictions that are included in state law protections at [Connecticut General Statutes Section 22-350a](#).

Recommendation: Striking the tethering text from this definition simplifies the ordinance and makes it easier to understand. Under the tethering section of the draft, include a specific reference to the protections afforded dogs at [Connecticut General Statutes Section 22-350a](#).

Again, thank you for the opportunity to provide these recommendations. The American Kennel Club, the Connecticut Federation of Dog Clubs and Responsible Dog Owners, and your constituents who are their members, are available to further assist you. Please do not hesitate to contact me for any reason at 919-816-3348 or Stacey.Ober@akc.org.

Sincerely,



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AKC Government Relations

Cc: Laurie Maulucci, President
Connecticut Federation of Dog Clubs and Responsible Dog Owners

Encl: Proposed Amendment to 111-6 AKC Recommendations