

RESPONSE TO COMMENTS  
GREYHOUND RACING RULE 178 CSR 2

The Racing Commission received one comment on the proposed amendments to the Greyhound Racing Rule, 178 CSR 2, from Steve Sarras, the President of the West Virginia Kennel Owners Association. The purpose of the proposed amendments are to accommodate greyhound constituent requests to exempt greyhounds traveling directly between West Virginia licensed racetracks from traditional veterinary health inspection certificate requirements in certain circumstances and to clarify the type of health certificate that is acceptable for greyhounds entering West Virginia racetracks.

Mr. Sarras supports the proposed amendments to the rule, with one exception. Mr. Sarras commented that the Commission should change the period of time that a veterinary health inspection certificate is valid from a 15 day period to a 30 day period. Additionally, Mr. Sarras comments that the period of time that greyhounds traveling directly between West Virginia racetracks should be exempt from the health certificate requirement should be changed from a 15 day period to a 30 day period.

The Commission, having considered Mr. Sarras' public comment, voted to adopt his suggested changes and has revised the proposed amendments to reflect a 30 day period for the validity of health certificates and a 30 day period of exemption when greyhounds travel directly between West Virginia racetracks.

July 17, 2020

Mr. Joe Moore  
WV Racing Commission  
900 Pennsylvania Avenue, Suite 533  
Charleston, WV 25302

**RE: Comments on Greyhound Rule, 178-02**

Dear Director Moore,

The West Virginia Kennel Owners Association submits the following comments on proposed rule 178-02, Greyhound Rule. The members of our Association appreciate the work that has been completed by you and your staff on the proposed rule and agree with the changes in the proposed rule, however **with further amendment.**

On pages 46 and 47 of the proposed rule, we would request that all references to 15 days be amended to 30 days for health certificates of our greyhounds. Our request for changing 15 to 30 days would apply to 53.1, 53.1a and 53.1b. For the following reasons we ask this change to be made by the WV Racing Commission:

- Hauling logistics; currently there are fewer haulers available and when delays and breakdowns occur, most likely, a 15 day health certificate won't allow for repairs and rescheduling of a trip without going beyond the current 15 day certificate.
- COVID restrictions; with the current pandemic, veterinarian visits and scheduling has changed dramatically. Most veterinarians have longer waiting lists for appointments making scheduling commercial hauls more challenging.
- Healthy dogs; State veterinarians still are able to quarantine dogs. Vaccinations required by West Virginia tracks keep our dogs healthy, not health certificates.
- USDA APHIS Form 7001; as noted in proposed rule, the 7001 form states it is "valid for 30 days after issuance". For consistency, the requirements in the WV Greyhound Rule should be the same 30-day period the USDA allows.

Discussion has been had by several parties regarding this change and all parties in discussion have agreed to this change in the proposed rule.

We are available for questions if needed.

Sincerely,

Steve M. Sarras  
President, WV Kennel Owners Association