



County of San Diego

JACK MILLER
Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
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ELIZABETH POZZEBON
Assistant Director

October 4, 2011

Councilmember Sherri Lightner
Council District 1
City Administration Building
202 "C" Street, MS #10A
San Diego, CA 92101

Dear Chairwoman Lightner:

When the County of San Diego became aware of the Urban Agriculture Ordinance, the County facilitated a couple of meetings with city staff, representatives from the California Department of Food and Agriculture and the County's Departments of Environmental Health, Public Health and Agriculture Weights and Measures. The purpose of the meetings was to inform city staff of the public health concerns with some of the provisions in the Urban Agriculture Ordinance. Based upon the September 28, 2011 city staff report, the County of San Diego's Department of Environmental Health and Public Health Services would like to take this opportunity to clarify why the County of San Diego still expresses concern with the allowance of backyard goats. We would like to thank your committee for this opportunity to review and comment on the Urban Agriculture Ordinance.

It is important to understand that milk has potential health risks when unpasteurized or not pasteurized properly, therefore, we discourage promoting the practice of producing milk at home. The public health risk of this practice would significantly outweigh any potential health benefits. Raw milk may harbor a host of disease-causing organisms (pathogens): such as, the bacteria *Campylobacter*, *E. coli*, *Listeria*, *Salmonella*, *Yersinia*, and *Brucella*. People with weakened immune systems, such as the elderly, children, and those with certain diseases or conditions, are most at risk for severe infections from pathogens that may be present in raw milk. In pregnant women, a *Listeria monocytogenes*-caused illness can result in complications, and *E. coli* infection has been linked to hemolytic uremic syndrome, a condition that can cause kidney failure and death.

Fortunately, San Diegans have access to fresh milk produced in California State Certified Dairies that is either pasteurized or unpasteurized (raw). It is illegal in the State of California to sell or give away milk that does not come from a California State Certified Dairy, which is appropriately recognized in the City staff report. The County also supports the removal of goats from inclusion in community gardens and retail farms, which will eliminate some of the concerns.

While the County agrees that education would be appropriate and necessary for any changes, it is still the recommendation of the Department of Environmental Health and Public Health Services that backyard goats are not included in the Urban Agriculture Ordinance. The Centers for Disease Control and Prevention (CDC) has recently updated their raw milk website that contains useful information and materials, including a list of relevant publications and other scientific resources on illnesses associated with raw milk consumption.

During our meeting, we also provided city staff with a letter from Dr. Christopher R. Braden, Director of the CDC's Division of Foodborne, Waterborne, and Environmental Diseases that specifically states, "To protect the health of the public, state regulators should continue to support pasteurization and consider further restricting or prohibiting the sale and distribution of raw milk and other unpasteurized dairy products in their states."

The County of San Diego appreciates the opportunity to work with the City on the Urban Agriculture Ordinance, and will continue to work with the City to provide support to protect the health and safety of the residents in the County of San Diego. For any questions or additional information, please contact Liz Pozzebon at (858) 505-6672.

Sincerely,



JACK MILLER, Director
Department of Environmental Health

Sincerely,



WILMA J. WOOTEN, MD, MPH
Public Health Office
Public Health Services

cc: Councilmember Todd Gloria, Vice-Chair, Land Use and Housing Committee,
City of San Diego District 3
Councilmember Kevin Faulconer, City of San Diego, District 2
Councilmember David Alvarez, City of San Diego, District 8
Kelly Broughton, Development Services Director, City of San Diego
Dan Joyce, Development Services, City of San Diego
Dr. Annette Whiteford, Director of California Animal Health and Food Safety Services,
California Department of Food and Agriculture