California Citrus Mutual

August 27, 2004

Ms. Dorothy Shimer
Research Division
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Shimer:

California Citrus Mutual wishes to respond to the *Draft report to the California Legislature, Indoor Air Pollution in California,* as requested by Assembly Bill 1173. CCM is a citrus producer's trade association whose membership farms in excess of 150,000 acres of citrus. Our industry produces citrus fruit with a value exceeding a billion dollars and employs over 14,000 people with an annual payroll exceeding $450 million.

While most of our production is sold via fresh channels of distribution, there is a percentage of our oranges and lemons sold in the process products arena. Fragrances, air fresheners and juice are the major components of the processed product market. We are therefore concerned with the paragraphs devoted to d-limonene and citrus terpenes.

We believe at best the wrong perception is conveyed. At worst the science leading to the conclusions expressed is without a solid foundation. To our knowledge it has not been peer reviewed. To that end we understand a study is presently underway that may cloud the conclusions contained within this draft. Terms such as carcinogens, air pollutants and toxic are thrown around too loosely and in our view inaccurately.

We also find the section on irritants somewhat confusing. The implication is that a consumer voluntarily uses the product within the privacy of their home or office to create irritation. Certainly you have wiggle room in additional wording but the inconsistency of that section is systematic of the report in our view.

We thank you for the opportunity to comment and welcome future dialogues on the subject.

Cordially,

Joel Nelsen
President

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