

SOUTHERN GARDENS CITRUS

August 18, 2004

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

Dear Ms. Shimer:

This letter is in response to the Draft Report to the California Legislature on Indoor Air Pollution (Assembly Bill 1173). Thank you for inviting comments on this report.

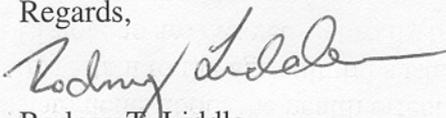
I would like to voice concern about the representation of citrus-derived d-Limonene and citrus terpenes in Assembly Bill 1173. Although the technical arguments are contrary to the presentation in Assembly Bill 1173, I will leave those to the scientists of the Citrus Industry and Florida Chemical.

However, I encourage the Air Resource Board to show caution in making such negative statements about the health effects of d-Limonene and citrus terpenes. These products are important to the agricultural sustainability of citrus growers. Citrus terpenes and d-Limonene are derived-naturally through the pressing of citrus peels in the juicing process. d-Limonene has a GRAS rating from FDA and is not listed on the National Toxicology Program list (NTP). Citrus terpenes and d-Limonene have been replacing known toxic chemicals for over 40 years.

On behalf of my fellow citrus growers and citrus processors, I ask that these misleading and negative statements about citrus terpenes and d-Limonene be removed from Assembly Bill 1173. These misleading conclusions may have a devastating effect on the citrus community.

Southern Gardens is the largest supplier of 100 percent pure Florida not-from-concentrate (NFC) orange juice to the private label industry and major brands. We grow oranges on over 30 thousand acres and are one of the largest citrus growers in the United States.

Regards,



Rodney T. Liddle
President

cc: Lisa Rath
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