

SOUTHERN GARDENS CITRUS

December 29, 2004

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

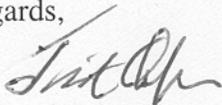
Dear Ms. Shimer:

This letter is in response to the *Draft (For Peer Review November 2004) Report to the California Legislature, Indoor Air Pollution in California in response to Assembly Bill 1173*. I would like to voice my concern about how ARB continues to misrepresent citrus-derived d-Limonene and citrus terpenes in this document.

However, I will ask you to show caution in making negative statements about the health effects of d-Limonene and citrus terpenes. These products are key to the agricultural sustainability of American 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 leading the way, for over 40 years, as replacements for known toxic chemicals addressing the safety issues outlined in your report.

On behalf of citrus growers and citrus processors, I ask that you to remove the many misleading and negative statements about citrus terpenes and d-Limonene. These misleading conclusions will have a negative effect on the American citrus community.

Regards,



Tristan Chapman
Vice President and General Manager of
Southern Gardens Citrus
Florida Citrus Commissioner