



78 Beaver Road, Suite 2A, Wethersfield CT 06109-2201
860-768-1100 • Fax 860-768-1108 • www.cfba.org

November 13, 2023

Chairwoman Rep. Lucy Dathan
Chairman Sen. John Kissel
Regulation Review Committee
State Capitol Building, Room 011
Hartford, CT 06106

Dear Members of the Regulation Review Committee:

Connecticut Farm Bureau Association, and the undersigned farm businesses and trade associations, urge you to reject the adoption of the CT DEEP Proposed regulations - Advanced Clean Trucks and Medium and Heavy-Duty Vehicle and Engine Emissions and Warranty Standards. Our agricultural businesses contribute to the economy of Connecticut in output, jobs, and quality of life: up to \$4.0 billion in output, 21,696 jobs, and invaluable social and environmental benefits.

The proposed regulations will have a significant economic impact on our Connecticut farm businesses at a time when we are experiencing unprecedented losses from weather related events, labor shortages and escalating production costs.

- Our farms haul highly perishable products: bulk milk, dairy products, fresh produce, livestock, poultry, eggs, vegetables, processed meat products, nursery stock, potted plants, seedlings, and more. Farm products need to be delivered to the processing plants, wholesale, and retail markets in the shortest time possible to prevent spoilage. Trucks hauling highly perishable farm products cannot sit at charging stations or sit idle roadside waiting for repair of failed emissions sensors or equipment failure associated with EV technology. Failure to deliver a food safe product to its destination will result in a direct loss to our farm and our farm businesses.
- The electrical infrastructure, trained technicians, OEM reliability issues, and a state-funded voucher system must all be in place *before* Connecticut farms can incur the cost of compliance. Perishable farm products that spoil or livestock that suffer in transport due to EV technology failure is a direct and tragic economic loss to the farm.
- Our farms are heavily reliant on medium and heavy-duty trucks to transport supplies, feed, fertilizer, and other inputs onto the farm while relying on the same vehicles to haul products from the fields to the farm and to market. The proposed regulations include vehicles 8,500 GVWR and higher which includes three-quarter ton pick-up trucks such as an F250 Ford. *These regulations will affect every farm in the state of Connecticut, from small vegetable growers to our larger dairy and poultry operations.*

The Voice of Connecticut Agriculture

- The cost to purchase an EV truck is estimated at an additional \$10,000 for pick-up trucks up to \$80,000 for heavy duty trucks. Our dairy farms, nurseries, greenhouse operations and poultry operations own and operate dozens of trucks. The cost to replace their current fleets with EV trucks will be in the millions of dollars. This expense does not include the cost to install charging stations, back-up vehicles to have available while trucks are charging, or the increased cost of commercial auto insurance which has increased significantly on existing older vehicles.
- Connecticut weight laws limit freight to a maximum amount of 80,000 GVWR depending on the configuration of the truck. The weight of the batteries necessary to charge a heavy-duty vehicle adds 10% to the gross vehicle weight of the vehicle. This reduces the amount of feed, fertilizer, and farm products a truck can haul by 10% resulting in additional transportation costs to the farm.

While we understand the need to reach zero-emissions to combat climate change and improve our air quality, we must take a step back and strategically plan to reach those goals. We must build the electrical infrastructure, allow technology to catch up, and establish dedicated funding to assist farm businesses with the cost of compliance to these standards.

We, the undersigned, ask you to reject the proposed DEEP Regulations until our concerns have been addressed.

Respectfully submitted,



Joan Nichols
Executive Director
Cell: 860-951-2791 joann@cfba.org



Paul Larson
President
Cell: 860-617-4227 paul@cfba.org

Agricultural Trade Organizations

Connecticut Farm Bureau Dairy Committee
Connecticut Nursery and Landscape Association
Connecticut Professional Timber Producers Association
Connecticut Vineyard and Winery Association

Farm Businesses

Airline Farm	Frank McLean III	Cobalt
Airline Farm	Rebecca McLean	Cobalt
Almost Home Barn	Mary Ellen Wettemann	Guilford
Amazing Graze Wagyu	Gene Nazzaro	Redding
Arthur's Farms	Andrew Blum	Easton
Barry Farms	Robert Barry	Harwinton
Bishop's Orchard	Keith Bishop	Guilford
Blackmer Farm	Daniel Kelley	Thompson
Blue Moon Farm	Jim Murdock Jr	Harwinton

Blue Moon Woolworks	Frances Larson	Coventry
Blue Slope Sawdust Co Inc	Alfred Staebner	Franklin
Bomba Bros. Dairy, Inc.	Vickie Bomba- Lewandoski	Seymour
Brookfield Farm	Melissa Dziurgot	Durham
Brookside Acres	Joe Matteis	Tolland
Buell's Orchard	Jeffrey Sandness	Eastford
Bush Meadow Farm	Nancy Kaplan	Union
Bussa Orchards	Doug Bussa	South Glastonbury
Buttermilk Lane	Ray Holden	Orange
Castle Hill Farm	Diana Paproski	Newtown
Castle Hill Farm	Stephen Paproski	Newtown
Cecarelli's Harrison Hill Farm	William Dellacamera	Northford
Cedar Hill farm	Stephen Bspuda Jr	Orange
Charlyn Farm	Lynwood Crary	Preston
Clover Nook Farm	Lars Demander	Bethany
Crystal Spring Farm	Bruce Deming	Torrington
Cushman Farms LP	James Smith	Franklin
Cushman Farms	Brandon Smith	Franklin
Double G Ranch	Darlene Gugliotti	Prospect
Double G Ranch	Frank Gugliotti	Prospect
East Willow Farm	Tom Satkowski	Columbia
Eight Mile River Farm	David and Elizabeth Potts	Lyme
Evening Star Farm	Ginni Dodd	Woodbury
Fairvue Dairy Farm	Paul Miller	Woodstock
Fairweather Growers	Ethan Starks	Cromwell
Farm Force One LLC	Jesse Clarke	Columbia
Fonicello Farms LLC	Mark Fonicello	Stafford Springs
Fort Hill Farms	Kies Orr-LaVack	Thompson
Freund's Farn, Inc	Benjamin Freund	North Canaan
Full Bloom Apiaries	Alan Holmberg	North Franklin
Galen Farm, LLC	Blaine Tallman	Fairfield
Geer Hill Farm	William Geer	Ledyard
Gleann Beag	Jim Malcolm	Middlefield
Graywall Farms	Robin Chesmer	Lebanon
Half Mile Acres	Barbara Hammarlund	Guilford
Half Mile Acres	John Hammarlund	Guilford
Hart Herbs LLC	Susan Segal	Hartland
Highland Ridge Farms	Gary Paganelli	Winchester
Highland Ridge Farms	Beverly Paganellu	Winchester
Hillandale Farms	Ed Hoffman	Bozrah
Hilldale Farm	Barbara Schukoske	Middletown
Hop Brook Farm	Wendy Grieger	Bethany
Hopkins Vineyard	Hilary Criollo	Warren

Horticulture Therapy Farm, LLC	Lisa Ford	Litchfield
Hull Forestlands Inc.	Ben Hull	Pomfret Center
Johnnycake Mountain Farm	Dwight Harris	Burlington
Jones Apiaries	Ted Jones	Farmington
Jones Family Farms	Jamie Jones	Shelton
Karabin Farms	Diane Karabin	Southington
Karabin Farms	Michael Karabin	Southington
KARV Cattle Co	Kirsten Kruger	Haddam Neck
KDW Livestock	Kevin Woolam	South Windsor
KDW Southdowns	Donna G Woolam	South Windsor
Kogut's Hemlock Hill Tree Farm	Bill Kogut	Meriden & Enfield
K-T Farm	Katharine Danielle Aguirre	Suffield
Laurelbrook Farm LLC	Cricket Jacquier	East Canaan
Leah DiGioia Suffolk Sheep Farm	Leah DiGioia	Higganum
Lynch Farm Inc	Brian Lynch	Goshen
M&M Farm	Nicholas Mucciario, Jr	Waterbury
Maple Row Farm	James Edwards	Easton
Maple Tree Farm	Robert A Page	North Branford
Mapleleaf Farm Enterprises	Werner Rechlin	Hebron
Mapleleaf Farm Enterprises LLC	Ned Ellis	Hebron
March Farms LLC	Susan March	Bethlehem
Maugle Sierra Vineyards LLC	Paul Maugle	Ledyard
Middletown Ag Science & Technology	Amanda Thomson	Colchester
Mountain Dairy	Craig Stearns	Mansfield
Mountain Dairy	Stacey Stearns	Mansfield
Nadeau Farm	Charles Hilton	Hamden
Nichols Forestry	Joan Nichols	Franklin
Norm Bloom and Son	James Bloom	Norwalk CT
Nutmeg Acres Farm	Joshua Tanner	Warren
Oakridge Dairy	Seth Bahler	Ellington
OB Farm	Vincent Senatore	Middletown
Ox Hollow Farm	Stephanie Maynard	Roxbury
Oxen Hill Farm, LLC	Jonathan Griffin	East Granby
Passionfruit Estate, LLC	Gary Schulte	Stonington
Patch's Hillside Farm LLC	Patrick Hedden	Hebron
Petersen Flower Farm	Susan Petersen	South Windsor
Planters' Choice, LLC	Darryl Newman	Newtown/Watertown
Pleasant View Farms	Jake Lipton	Somers
Pleasant View Farms	Jeff Lipton	Somers
Pleasant View Farms	Lou Lipton	Somers
Prides Corner Farms	Mark & Lisa Sellew	Lebanon
Race Hill Farms	David Dupuis	Glastonbury
Raffia Farms Inc	Gary Raffia	Enfield

Raffia Tobacco, LLC	Andrew Urbanowicz	Enfield
RG Farms LLC	Ross Girardin	West Suffield
Ridgeland Farms	Lori Vogel-brown	Middlefield
Rocky Meadow Tree Farm	Judith Saunders	Danbury
Rogers Orchards Inc.	John N Rogers	Southington
Round Tuit Ranch	Jennifer Seymour	Enfield
Rowledge Pond Aquaculture	Karen Bobowick	Sandy Hook
RWR Farm	Russell Robinson	Durham
Sam Bridge Nursery and Greenhouses LLC	Nick Bridge	Greenwich
Second chance farm	Peter Larese	East Windsor
Selbuort Valley Farm	John White	Woodstock
Sepe Farm LLC	Peter Sepe	Sandy Hook
Sheehy Farm	Jay Sheehy	Stratford
Skerryvore Farms	Barbara Robinson	Greenwich
Smith's Acres	Teresa Smith	East Lyme
South Norfolk Lumber Co	Henry Gundlach	Norfolk
Southdown Pastures	Karen Zagurski	Terryville
Sprucedale Gardens Nursery and Greenhouse	Paul Larson	Woodstock
Still River Farm	Andrew Dappollonio	Coventry
Stone Oak Farms	Blain Kukevitch	Lebanon
Stonepasture Farm	Walter Adametz	Killingworth
Strong's farm	Steve Strong	East Hampton
Sycamore Farm	Peter and Diane DiGioia	Higganum
Sycamore Farm Meats	Peter N DiGioia	Higganum
Syme Family Farm LLC	Bill Syme	East Windsor
Tangle Tree Farm	Bob Keefe	Colchester
Tetlak Family Farm	Tyler Grailich	Oxford, CT
The Modern Milkman	Ethan Martins	Ellington
Townline Farm	Cristian Mortali	Woodbridge
Trailside Nursery	Sammy Bridge	Greenwich
Tripledale Farm	Kimberly Brockett	Guilford
Tulmeadow Farm	Don Tuller	West Simsbury
Urbanowicz Farm	Andrew Urbanowicz	Enfield
V Town Ag Supply LLC	John Gileau	Voluntown
Valentines	Daniel Valentine	Wilton
Valley View Dairy	Benjamin Learned	North Stonington
Varga Farms	Paul Varga	Ashford
Walnut Hill Farm	Sydney Mintz	Middlefield
Wee Bit of Scotch Farm LLCV	Reginald Patchell	Hanover
Wettemann Farm	Paul Wettemann	Guilford
Wimlmer Properties LLC	Richard Porter	Durham
Windmere Farm	Amy Bentley	Lebanon
Windsor Hunt Stables, LLC	Robert Garthwaite	Windsor

Woodmansee Farm
Wysocki Farm

Clark Woodmansee
James Wysocki

Preston
Ellington

Individuals

Nancy Haack
Matthew Staebner
Nina Stietzel

Prospect
South Glastonbury
Redding