



Ohio Environmental Council

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**Testimony before
Ohio House Finance and Appropriations Committee
129th Ohio General Assembly**

**Regarding
House Bill 153 – Biennial Operating Budget (As Introduced)**

**By
Jack Shaner, Deputy Director, Ohio Environmental Council**

April 12, 2011 – Columbus, Ohio

Chairman Amstutz, Vice Chair Carey, Ranking Minority Member Sykes, and Members of the Committee:

Thank you for this opportunity to present Interested Party testimony on House Bill 153 (As Introduced), the biennial operating budget bill.

My name is Jack Shaner and I am Deputy Director for the Ohio Environmental Council. The OEC is a non-profit network of more than 100 local and state environmental-conservation groups and several thousand individual citizen members. Our mission is to secure clean air, land, and water for all who call Ohio home.

BUDGET OVERVIEW—Ohio EPA and Ohio DNR

Together, the EPA and DNR account for 0.4% of the \$119.9B grand total of all recommended expenditures and spending authority for all agencies for the biennium (\$55.6B for FY 2012 and \$56.3B for FY 2013) from all revenue sources, both GRF and non-GRF revenue.

For the Ohio Environmental Protection Agency, the Governor's Executive Budget proposes spending authority of \$187.8M for FY 2012 and \$184.1M for FY 2013—a reduction of \$28.3M or 13.1% in the first FY and an additional \$3.7M or 2.0% cut in the second FY. The EPA budget includes a continuation of all existing fees, with no net fee increases.

For the Ohio Department of Natural Resources, the Executive Budget proposes total appropriations and spending authority of \$296.3M for FY 2012 and \$311.9M for FY 2013—a cut of \$48M or -14% in FY 2012 and a growth of \$15M or +5.3% in FY 2013.

The OEC appreciates the extremely challenging budget situation of the State of Ohio. We are not here today to seek increases in spending for environmental protection and natural resource conservation, even though we believe they are justified. Nor are we here to ask that the general taxpayers of Ohio be asked to share more of the cost of these important programs through the General Revenue Fund (GRF), even though we believe many taxpayers would be willing to do so.

We are here, though, to respectfully express three general recommendations:

1. Please resist any effort to further reduce the spending authority of the Ohio EPA or the spending authority or appropriations of the ODNR. The workload of each of the agencies has not decreased; in fact, it is only increasing as staff resources are declining. The ODNR budget, in particular, has experienced a steady and steep decline in GRF appropriations—43%—from \$95M in FY 2000 to \$54M in FY 2011.
2. As the economy recovers and as fee and GRF income increase, we believe the Administration and the General Assembly should revisit the budget and adjust the spending authority and appropriations for important environmental protection and natural resource conservation programs, accordingly.
3. For the ODNR, consider emulating the funding structure of the EPA and transfer more of the burden of funding regulatory oversight of extractive activities off of general taxpayers and the GRF and place it, instead, onto the extractive industries that profit from the development of natural resources.

OHIO EPA—AREAS OF SUPPORT + INTEREST

We appreciate EPA Director Nally's goal of environmental compliance (first) and economic growth, and we look forward to continued dialogue with him and his staff. Here are some brief comments on several of Director Nally's initiatives and identified priorities:

1. Wetland Mitigation

The OEC is intrigued with the EPA's initiative to team with the ODNR and U.S. Army Corps of Engineers on wetland and stream mitigation projects. We look forward to learning more about this effort.

2. Permit by Rule and General Permits

The OEC does not object to the use of permits by rule and general permits for small, less complicated facilities. We are concerned, though, that the public have a meaningful opportunity to learn about and comment on any proposed facility—regardless of whether the facility receives a permit by rule, general permit, or individual permit. The OEC believes residents have a right to know and comment when any facility is proposed for operation or change.

3. Hazardous Waste and Solid Waste Consolidation

We support Director Nally's efforts to consolidating permitting, inspections and enforcement for both solid and hazardous waste into one division, and move the cleanup components of the hazardous waste division into the existing Division of Emergency and Remedial Response. As long as oversight and enforcement efforts are vigorous, this seems like a reasonable and sensible efficiency.

4. Brownfield Redevelopment

Turning trash to treasure. That's the beauty of while cleaning up and converting shuttered industrial sites into clean, productive sites that attract new jobs and commerce is a classic win-win for the environment and the economy. We look forward to learning more about Director Nally's plans.

5. Expedited Compliance

We share Director Nally's frustration with the slow compliance with offenders and his desire to drive faster compliance. Again, we look forward to further dialogue with the Director.

OHIO EPA SPENDING AUTHORITY—AREAS OF SUPPORT AND CONCERN

The OEC supports the Executive Budget's extension for the next two years of the various fees which fund the administration and enforcement of many environmental protection programs. These fees are absolutely vital to assuring the protection of our air, land, and water resources.

As stated earlier, however, we are concerned with the overall cut to the EPA's spending authority, a 13.1% cut in FY 2012 and an additional 2.0% in FY 2013. Again, cutting the EPA's spending authority will not help balance the GRF budget as EPA receives zero GRF funding.

The EPA states that it intends to economize operations, including through the elimination of 53 positions through vacancies, attrition, and reorganization. This continues a trend back at least to FY 2008, when there were 91 more FTE positions at the EPA than are budgeted for the new biennium. (See Table 3 of LSC Redbook.) Reduced staff usually means less resources to achieve environmental compliance. This is a serious concern.

To be fair, there are several areas of proposed increases in spending authority for the EPA.

For instance, the **Air Pollution Control Administration** program (line item 715643) is recommended to increase from \$750,000 in FY 11 to \$1.4M in FY 12, nearly a 100% increase grow slightly (by 0.1%) in FY 13. This line item is used to supplement other funding sources available for the administration and enforcement of the state's air pollution control laws.

Roughly 60% of the recommended annual appropriation will be allocated for operating expenses, largely payroll, with the remainder, around 40%, disbursed as subsidies. The line item's appropriation is supported with money appropriated from the Air Pollution Control Administration Fund (Fund 6960), which consists of money received from enforcement actions and civil penalties imposed for violations of state air pollution control regulations. The fund's annual revenues total around \$1.2 million. Also of note is that the executive proposed budget amends existing permanent law to change the cap on the amount of money that can spent from Fund 6960 for the administration and enforcement of the Air Pollution Control Law. The proposed change will increase that cap from \$750,000 per year to \$1.5 million. (LSC Redbook)

We support this progressive change in policy which we believe will pay dividends in cleaner air for Ohio citizens.

On the other extreme, several important programs are recommended for deep, deep cuts, including:

Air Pollution Control: 41% cut in FY 12; 2% growth in FY 13

FY 10: \$6.5M

FY 11: \$7.6M

FY 12: \$4.4M

FY 13: \$4.5M

This SSR line item (715672) is used to generally support the numerous objectives and programs of the Division of Air Pollution Control. The executive recommended appropriation for this purpose in FY 2012 is \$4,438,629, a \$3,168,371, or 41.7%, decrease from the FY 2011 estimated expenditure of \$7,607,000. The executive recommended appropriation for FY 2013 is slightly higher than the FY 2012 recommendation by \$96,129. Most of the line item's recommended appropriation in each fiscal year will be allocated for operating expenses, largely payroll. Around \$450,000 in each fiscal year will be disbursed as subsidies. (LSC Redbook)

Surface Water: 32% cut in FY 12; 1.6% growth in FY 13

FY 10: \$11.3M

FY 11: \$13.1M

FY 12: \$8.9M
FY 13: \$9.1M

SSR line item 715624, Surface Water, finances the Division of Surface Water's efforts to implement the programs and objectives of the federal Clean Water Act with the goal of all of Ohio's lakes, rivers, and streams attaining fishable and swimmable standards. For FY 2012, the executive proposed budget recommends a line item appropriation of \$8,970,181, \$4,227,819, or 32.0%, from the FY 2011 estimated expenditure of \$13,198,000. For FY 2013, the executive recommendation is \$9,114,974, a slight increase from the FY 2012 recommendation. Virtually all of the line item's recommended appropriation will be allocated for operating expenses, largely payroll. The line item's appropriation is supported with money appropriated from the Environmental Protection Fund (Fund 5BC0), which consists of the proceeds from a per ton tipping fee collected on the solid waste disposed in Ohio landfills. The fund's revenue receipts totaled \$20.9 million in FY 2009 and \$30.3 million in FY 2010. In addition to this line item (715624), there are 11 other line items used by the Ohio EPA that draw their appropriations from this fund. (LSC Redbook)

Water Pollution Control Administration: 70% cut in FY 12; 0% change in FY 13

FY 10: \$0.5M
FY 11: \$0.75M
FY 12: \$0.2M
FY 13: \$0.2M

SSR line item 715644, Water Pollution Control Administration, is used by the Division for the costs of administering and enforcing water pollution control laws. For FY 2012 and FY 2013, the executive proposed budget recommends a line item appropriation of \$220,000, a \$530,000, or 70.7%, decrease from the FY 2011 estimated expenditure of \$750,000. All of the line's recommended appropriation will be allocated for operating expenses, largely payroll. The line item's appropriation is supported with money appropriated from the Water Pollution Control Administration Fund (Fund 6990), which consists of 50% of the civil penalties collected for certain water pollution control law violations. The fund's annual revenue stream is around \$1.2 million.

We are very concerned about these deep cuts in spending authority in the Executive Budget.

OHIO EPA STATUTORY AUTHORITY—AREAS OF SUPPORT

There are several positive changes to the Ohio EPA statute proposed in the Executive Budget that the OEC supports, including:

- Increases from \$750,000 to \$1.5 million the cap on the amount of money credited to the Air Pollution Control Administration Fund that the Director may spend in any fiscal year for the administration and enforcement of the Air Pollution Control Law.
- Extends the time period for conducting a public meeting regarding an application for a permit for a new or modified solid waste facility from 35 to 45 days after the submission of the application.

There is at least one statutory change which we are further investigating:

- (R.C. 3734.57)—Exempts from state and local solid waste disposal fees coal combustion wastes regardless of whether the disposal facility is located on the premises where the wastes were generated, rather than specifying (as in current law) that the wastes must be disposed of at facilities that exclusively dispose of coal combustion wastes and that are owned by the generator.

The Agency's rationale for this proposed law change seems reasonable: To encourage the disposal of coal combustion waste in municipal solid waste landfills, rather than in less regulated and less protective residual waste landfills. The OEC is engaging in further dialogue with the Ohio EPA on this subject.

OHIO DEPARTMENT OF NATURAL RESOURCES

General Revenue Fund support for the ODNR has been cut nearly in half over the past 11 fiscal years. For FY 2000, ODNR was appropriated \$95M; in FY 2011, the amount was \$54M. While it is not realistic to expect a turnaround in GRF funding for any agency in the new biennium, we are concerned about the long-term health of the land-holding divisions and important services they provide the public.

While we support the mission of the ODNR and its programs, we are very concerned about several – and outright opposed to some – policy proposals included in the Executive Budget.

Among our top concerns are:

1. State Nature Preserves – Help keep the mission intact...and visible!

Conkle's Hollow. Hueston Woods. Blackhand Gorge. Kent Bog. These and other State Nature Preserves and are among Ohio's jewels—the finest remnants of our remaining gorges, prairies, old-growth forests, bogs and fens, and other natural wonders of state and national significance. The former Ohio Division of Natural Areas and Preserves (DNAP) was responsible for protecting nearly 30,000 acres of unique and endangered sites. Ohio's fragile natural treasures need continuous care to protect them from abuse, including from poaching and invasive plants. The once small but mighty Division of Natural Areas and preserves is no longer. The Strickland Administration all but eliminated it with the planned redirection of the Scenic Rivers program to the Division of Watercraft (an effort the OEC supported because of the dedicated revenue source to care for the rivers achieved by this move) and the unplanned spinoff of the Natural Heritage Database to the Division of Wildlife and the eventual 100% cut to GRF funding in FY 2011.

The Executive Budget makes this de-facto dissolving of DNAP begun under the Strickland Administration legally complete. Under the Executive Budget, the Division of Natural Areas and Preserves is no longer. Instead, its operations are merged with the Division of Parks and Recreation. We are deeply saddened and frustrated with this turn of events. We believe it is inevitable that the mission of the always lean but once proud DNAP will diminish. We firmly believe it is important that this division be revived again one day.

The Executive Budget recommends \$0.5M in each FY for line item 725656 - Natural Areas and Preserves. This line item supports land acquisition and conservation easements, new project development, habitat restoration, and ecological management. The \$1.1M in total spending authority is down significantly from \$1.7M in the current biennium. This source of this line item is Fund 5220—the Natural Areas and Preserves Fund. Revenue for this fund is from state income tax refund contributions from the general public and donations. While this is an important source of funds, it is just not a sustainable source of funds. The nature preserves desperately need GRF support.

While GRF funds are so very tight, we respectfully ask the Committee at least to take action to help maintain the distinct mission of the preserves. We ask the Committee to direct the ODNR to implement the following no-cost measures to help assure the continuation of the important mission of caring for these most special places and—equally important—maintain the support and affection many nature lovers hold for the Preserves:



These reforms will not cost a dime, but they will be much appreciated by the nature-loving public that has grown to revere these natural jewels and their protection since Ohio began establishing its superlative system of preserves some 40 years ago.

2. State Nature Preserves—Keep the tax check-off fund resolute, not dilute

It takes funds to protect Mother Nature. And nature lovers are doing their part: In Tax Year 2009, it is our understanding that taxpayers donated approximately \$300,000 to the Natural Areas Fund through the state income tax check-off program.

To the Kasich Administration's credit, it is respecting the intent of the tax check-off fund and not allow any diversion of funds to pay for full-time permanent staff. We salute Director Mustine and the Administration for this.

However, the Executive Budget proposes to repurpose and rename the Natural Areas and Preserves Fund the Natural Areas and Preserves and State Parks Fund, thereby qualifying State Parks for taxpayer donations. The purpose is well intended: to broaden the base of donors by appealing to park lovers. We are concerned, however, that this will dilute support for the preserves. In addition, should the General Assembly ultimately open State Parks to oil and gas development (a policy the OEC and the environmental community adamantly oppose), we believe many taxpayers may stop making donations to this repurposed fund because they will be upset to know that State Parks are open to oil and gas development or because they believe that parks are awash in oil and gas revenue and do not need additional support.

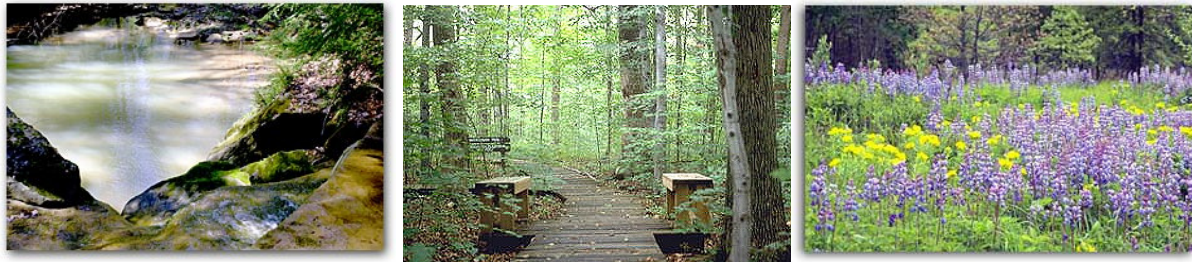
We respectfully ask the Committee to set the proposed dilution of the existing tax check-off fund.

3. State Nature Preserves—Keep them free and clear of oil and gas development

As established in the Ohio Natural Areas Act of 1970, Ohio's system of State Nature Preserves protects ecological and geological areas of statewide and even national significance. Many of these natural areas include some of the finest remnants of Ohio's natural heritage—remnants of Ohio's original prairie, old-growth forests, bogs and fens, and wondrous rock formations.

ODNR Director Mustine recently has stated his intention that Ohio's State Nature Preserves remain permanently protected from oil and gas development. We appreciate the Director's pledge, and we take him at his word. To make good on the Director's pledge for this and future Administrations and General Assemblies, we respectfully but most vigorously ask the Committee to codify this pledge so that there is no opportunity for misunderstanding. As discussed above in point No. 1, the Executive Budget transfers the care of the Nature Preserves to the Division of Parks. As such, some could suggest that there is ambiguity over the legal

autonomy of State Parks and State Nature Preserves. An amendment to the Revised Code stating that—notwithstanding the merger of the Division of Natural Areas and Preserves with the Division of Parks and Recreation—it is the express intent that State Nature Preserves and State Natural Areas shall remain protected from development, including specifically, oil and gas development and timber harvesting, would prevent any such interpretation. Such an amendment would be deeply appreciated by Ohio’s nature lovers. It would also be consistent with current articles of dedication for each site but would clarify these points. Indeed, it was the express intent of the founding legislation creating the Ohio state nature preserve system, that these sites remain natural, undeveloped and unblemished for the benefit of future generations of Ohioans.



4. Exploration for Oil and Gas Development on State Parks

The Executive Budget authorizes the Chief of the Division of Parks and Recreation, with the approval of the Director of Natural Resources, to sell, lease, or transfer minerals or mineral rights, specifically oil and natural gas, on state-owned lands that the Division administers and to enter into contracts for drilling. The proposal also creates the Parks Mineral Royalties Fund, consisting of all investment earnings of the Parks Mineral Royalties Trust Fund and of any principal transferred from the Trust Fund at the Director’s request. Requires money in both funds to be used by the Division to facilitate capital improvements, maintenance, repairs, and renovations on state properties administered by the Division.

The OEC strongly opposes this proposal. We simply believe that industrial development such as oil and gas extraction is unfit, unsafe, unsightly, unnecessary, and unwanted on Ohio’s state parks and other state lands with significant ecological, natural, scenic, recreational, geological, or archeological features—not to mention a betrayal of the public’s trust. Instead, we respectfully recommend that the General Assembly and the Administration consider other options for providing adequate resources for protection and administration of our state lands.

Please see separate testimony on House Bill 133 at <http://bit.ly/f42hLG>.

5. Logging on State Parks

The Executive Budget also allows the Chief of the Division of Parks and Recreation to sell or otherwise dispose of by lawful means forest products, in addition to timber as in existing law, that require management for specified reasons, and adds to those reasons implementation of sustainable forestry practices. In addition, it authorizes the Chief of the Division of Parks and

Recreation to enter into a memorandum of understanding with the Chief of the Division of Forestry to allow the Division of Forestry to administer the sale of timber and forest products on lands owned or controlled by the Division of Parks and Recreation. Finally, it requires 75% of any proceeds from such a sale to be credited to the State Park Fund and 25% to be credited to the State Forest Fund.

Existing law authorizes very limited timber harvesting on State Parks. We are very concerned about the Executive Budget may be interpreted to vastly expand this existing limited authority.

Frankly, we do not understand the need for this expansion. Our State Parks have long been protected from natural resource development and extraction. Why is necessary to expand the existing authority?

We respectfully ask the Committee to set this recommendation aside until it can be further considered.

6. Division of Forestry personal services contracts (O.R.C. 1503.05)

The bill authorizes the Chief of the Division of Forestry to enter into a personal service contract for consulting services to assist the Chief with the sale of timber or other forest products and related inventory. Compensation for the consulting services must be paid from the proceeds of the sale. Current law authorizes the Chief to sell timber and other forest products from state forests and state forest nurseries. The Chief may make the sales whenever the Chief considers such a sale desirable.

Here again, we question why this law change is necessary. Current law already authorizes the Forestry chief to conduct timber sales. Why is this change necessary?

We respectfully ask the Committee to set this recommendation aside until it can be further considered.

7. Soil and Water Conservation

Some researchers estimate that the U.S. is losing soil 10 times faster than the natural replenishment rate. One rainstorm, some scientists estimate, can wash away 1 mm (.04 inches) of soil. If left to natural processes, it can take years, even decades, to replace that loss. Erosion promotes critical losses of water, nutrients, soil organic matter and soil biota; reduces soil productivity; and contaminates water with fertilizers and pesticides. Fortunately, ODNR is a recognized leader in soil and water conservation.

The OEC strongly supports the work of the ODNR's Soil and Water Division and the local county Soil and Water Conservation Districts. The OEC respectfully urges the Committee to accept the Executive Budget proposal to extend the scrap tire fee. We also respectfully urge the Committee to restore \$2.9M in state matching funds for local soil and water conservation efforts.

8. Mineral Resources Management

Today's stricter laws require that coal operators successfully return mined areas to their pre-mining land uses. But staffing levels for Ohio DNR regulatory oversight of coal mining have not kept pace with the significant expansion of regulatory responsibilities from recent legislation, including House Bill 443 (126th G.A.).

We respectfully urge the Committee to consider a tax or fee increase on the Ohio coal industry to replace GRF funding of the coal regulatory program. The previous Administration, as you know, proposed a new fee of \$0.08 fee per ton of coal production. According to previous Administration, that proposed fee would have replaced GRF funding and would cover additional staff and other administrative costs for coal enforcement operations that formerly were funded through the GRF. The Office of Budget and Management at that time had estimated that the coal extraction fee would generate approximately \$1.2 million in revenue that previously would have been provided through the GRF.

Consider the following fact: The total value of 22 million tons of coal mined in Ohio in 2007 was \$655 million. The proposed Operating Budget for the next biennium asks the coal industry to pick up an additional \$1.2 million in each of the next two fiscal years for regulatory oversight. This represents less than 2/10ths of one percent (0.0018) of the coal production value for 2007.

The Ohio EPA has moved off of the GRF. We believe it is appropriate to ask other regulated industries to shoulder more of the financial burden of the cost of regulatory oversight of their impacts to air, land, and water resources.

The coal industry profits from mining coal in Ohio. The coal industry can and should bear a greater share of the cost of regulatory oversight by the ODNR. The OEC strongly supports the ODNR's call for the mining industry to bear a greater share of these costs.

As such, we ask the Committee to relieve taxpayers of more of the cost of regulatory oversight of the coal industry.

9. Geological Survey

The sophisticated geologic mapping this quiet division develops helps guide responsible development of mineral resources, protect water supplies, improve the coastal resources of Lake Erie, and monitor seismic activity in Ohio. The OEC supports the Executive Budget proposal to require the Chief of the Division to adopt rules establishing fee schedules for:

- Providing manipulated, interpreted, or analyzed data from the Division's archived geologic records, data, maps, rock core, and samples; and
- Creating custom maps, custom data sets, or other custom products and providing information on Ohio's geological nature.

OHIO DEPARTMENT OF TRANSPORTATION

The OEC strongly supports continued funding for public transit and for the Ohio Rail Development Commission.

Public Transit—Each weekday, nearly half a million Ohioans rely on a transit bus or (in Cleveland) transit train to commute to work or school, visit the doctor, or travel to an important destination. Public transit delivers more than just a safe, convenient, and reliable commute. It also saves commuters money; stimulates jobs and local economic growth; offers mobility choices, especially to rural residents and the elderly and handicapped; reduces highway congestion; encourages efficient land use; reduces fuel consumption; lessens America's dependence on foreign oil; and improves air quality.

Fifty-nine public transit agencies—35 rural and 24 urban—serve Ohio, transporting 126 million riders each year. All across America, the demand for service is growing. National transportation experts predict a doubling of public transportation ridership in 20 years. Long term, Ohio should step up its investment in fuel-saving transportation options, especially mass transit. Ohio should reverse its recent years of disinvestment and instead invest desperately needed state funding into transit.

Despite its many benefits, public transit is seriously under-funded in Ohio. The Buckeye State ranks 12th in transit ridership, but only 28th in per capita funding. Here's how we compare in per capita state spending on transit to some competitor states: IL, \$63.29; PA, \$61.25; MI, \$20.73; OH, \$1.58. State transit funding in Ohio has fallen drastically in recent years, from \$43 million in 2000-2001 to \$16 million in 2006-2007. It will take years for local transit to recover. Meantime, Ohio can help itself by insisting that state-funded agencies coordinate transportation needs with local transit companies; encourage the "flexing" of federal funds to help local transit agencies replace aging buses and trains; and identifying dedicated funding sources for public transit.

Ohio Rail Development Commission—When it comes to rail transportation, Ohio is a gateway to America. Ohio ranks in the top 10 for nearly every freight rail measure, including total track miles, total tons shipped, and total employment and wages. And when it comes to the environment, rail transport is on track.

Railroads move more tons of freight per mile than any other mode of transportation in America. And they move it using far less energy (3 X less fuel use than trucks); producing far less pollution (of all transportation modes, rail produces only 9% of NOx, 4% of PM, and 2% of greenhouse gas emissions); and reducing far more highway congestion (a single inter-modal train can take up to 280 trucks—equivalent to 1,100 cars—off the highway). Moving freight—and passengers—by rail saves energy, reduces air pollution, lessens America's reliance on foreign oil, takes more trucks off the highway, and gives Americans more transportation options. Bottom line: Rail + Ohio = a win-win for shippers, travelers, and the environment. The energy efficiency benefits of rail transportation coupled with the Ohio Rail Development Commission's proven track record of maximizing public investments in inter- and intra-modal infrastructure makes the ORDC a good investment choice for the economy and the environment.

OHIO CONSUMERS' COUNSEL

The Executive Budget proposes \$4.1M in each FY for the Office of the Consumers' Counsel—a 51% cut from FY 11.

We cannot overstate how unjustified we believe this cut is. As you know, the OCC is funded, not by the GRF, but by a small assessment on utility bills—the equivalent of less than a nickel on every \$100 of purchased utility service. In return, residential consumers have enjoyed an estimated \$92M in savings in utility rate cases, thanks to the efforts of the OCC. In addition, the Consumers' Counsel is a stalwart supporter of the cheapest, fastest, easiest to install and maintain, and most effective form of clean energy: energy efficiency.

We vigorously urge the Committee to reject the this unjustified budget cut and fully restore the Consumer's Counsel budget. (Please see the recent Columbus *Dispatch* column in defense of the OCC budget, at <http://bit.ly/h9stMu>.)

Thank you for considering our perspective.

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