

April 30, 2010

The Honorable Hilda Solis  
U.S. Department of Labor  
200 Constitution Avenue Northwest  
Washington, DC 20210-0001

Dear Secretary Solis:

On behalf of the Midwestern Governors Association (MGA), I submit the following comments for your consideration toward the Bureau of Labor and Statistics' solicitation on the definition of green jobs. Over the past year, the MGA has done extensive work on identifying ways to create and retain jobs in the new energy economy. Midwestern governors understand the need to have a precise, consistent definition for a national strategy, and many of my fellow governors have provided those comments on a definition by individual state submissions. However, the region's governors also want to provide a regional perspective for you and the U.S. Department of Labor.

This past October at a Jobs and Energy Forum in Detroit, Midwestern governors signed the *Platform for Creating and Retaining Midwestern Jobs in the New Energy Economy* (Jobs Platform). In this document we defined the new energy economy as one in which jobs, businesses and investments are generated while expanding energy production; increasing energy efficiency; reducing carbon emissions, waste and pollution; and conserving natural resources. By focusing on defining the more encompassing "new energy economy" instead of "green jobs", governors believe that they can better develop a sustainable economy that best incorporates energy security and climate stewardship. While this process defines "green jobs", governors hope you will expand your definition to include other jobs that will play a crucial role in our nation's new energy economy.

In order to develop this definition, governors charged a diverse stakeholder group that with developing guiding principles for creating jobs in the new energy economy. These principles included having a regional focus, building on existing strengths, being forward looking and transformative, emphasizing quality jobs, sustainability, collaboration and coordination, nurturing leadership, replicability/transferability, and measurability.

Governors are pleased to see that the seven categories of economic activities that the Bureau of Labor Statistics suggests for "green jobs" broadly encompass our definition of the new energy economy. Within the seven categories, Midwestern governors feel that transmission jobs need to be counted in your definition, as an expanded transmission network is essential in moving renewable energy from where it is produced to where it is consumed. The transmission lines, and the people whose job it is to construct and maintain these lines, are just as critical to the new energy economy as any other job that produces renewable energy.

As you develop the definition, it is important to include both upstream and downstream positions, as well as explore how various industries and sectors of the economy should be included in the definition of "green jobs". America continues to be the largest manufacturer in the world, with the Midwest contributing significantly to our country's output. The workforce and manufacturing sector are undergoing a process of retooling in order to produce wind turbines, solar panels, advanced coal power plants and more energy efficient appliances and materials.

Within this process of retooling, education and training play a significant role in developing a skilled workforce. Research positions, both at universities and private facilities, also play an integral role in growing the number

of “green jobs”. For example, scientists and researchers speed the development of advanced biofuels and the deployment of carbon capture and storage at coal-burning energy facilities.

Today’s agriculture industry plays a vital role in sustainability feeding the world, while providing sources of renewable energy. Governors encourage you to closely examine the agricultural industry to ensure that your definition includes these jobs.

Finally, governors recognize that many jobs and occupations in the new energy economy will not emerge until the next decade, and that thousands of jobs and occupations which exist now can be retooled to support deployment of new energy technologies, services and processes. Many of these, if not all, would very likely be considered “green jobs”. As such, it is important that any definition the U.S. Department of Labor adapts for “green jobs” be flexible and adaptable to a changing energy economy.

Thank you for your consideration of our comments toward Bureau of Labor and Statistics’ solicitation. Midwestern governors look forward to working with you and your staff as you work toward defining “green jobs”, and I hope our submitted comments will be of assistance. Should you require any further assistance, please contact me at 202-624-5460.

Sincerely,

A handwritten signature in blue ink that reads "Jesse Heier" with a stylized flourish at the end.

Jesse Heier  
Washington Director  
Midwestern Governors Association