



NARC

Building Regional Communities

National Association of Regional Councils

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April 29, 2010

Mr. Richard Clayton
Office of Industry Employment Statistics
The Bureau of Labor Statistics
2 Massachusetts Ave., NE, Room 4840
Washington, DC 20212

Re: Federal Register Doc. 2010-5705, Filed 3-15-10

Dear Mr. Clayton:

The National Association of Regional Councils (NARC), a national trade organization representing multi-jurisdictional regional planning organizations and their local elected officials, appreciates the opportunity to comment on the Bureau of Labor Statistic's proposed definitions of green jobs.

Regions across America – large and small, urban and rural – seek ways to stimulate regional economies through economic development strategies that meet federal goals and local needs while protecting and preserving the environment. NARC, with funding from the U.S. Department of Labor's Pathways out of Poverty program, is working on a two-year effort to train and place workers in green occupations including: weatherization, deconstruction and materials use, building performance, heating and ventilation, solar and wind energy. In addition to working directly with four regions, we seek opportunities to take best practices to our member regions across the country. Clear ways to define green jobs would be helpful for measuring the impact this sector has on our total economy, as well as for providing regions an array of choices for focusing efforts that build the green economy.

We respectfully offer the following suggestions for defining green jobs.

The Composition of Seven Economic Activity Areas

The seven economic activity areas proposed – renewable energy, energy efficiency, greenhouse gas reduction, pollution reduction and cleanup, recycling and waste reduction, agricultural and natural resources conservation, and education, compliance, public awareness and training – seem reasonable and are in accord with many of the activities undertaken by regional planning organizations and their member local governments. In relation to categories one and two, many regions are investing in renewable energy generation, as well as energy efficiency, and we anticipate these sectors will become increasingly important parts of our national economy. Under category three, we agree with your inclusion of research and development activities related to a reduction in greenhouse gases (GhG), including research into the reduction of greenhouse gases from fossil fuel production (e.g. capture and sequestration of GhG emissions from coal fired power plants), as well as nuclear energy.

Some of our regions have been working on deconstruction projects, recovering and reusing building materials from vacant and abandoned properties. Thus, we think it is important to explicitly include deconstruction, salvage and reuse industries in your fifth category, recycling and waste reduction. Deconstruction activities provide economic development opportunities for communities and reduce the need to maintain unused infrastructure. We appreciate the inclusion of category six, agriculture and natural resources, and encourage pollution prevention activities related to this sector, including organic agriculture and water conservation activities, to be leveraged as important parts of the green economy. We also agree with your inclusion of education, outreach and training activities, in category seven. In order to have long-term impacts, considerable training and public education on the activities, benefits and outcomes of green jobs and green technologies are needed.

Additionally, NARC recommends incorporating the development and use of regional energy strategies that leverage federal opportunities for economic development, promote energy management and efficiency, and create green jobs in the appropriate energy categories above (e.g., categories 1, 2 and 3).



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The Four Sets of Green Goods and Services

In general, NARC believes the ultimate goal of a green economy is to produce products and services using processes that minimize environmental impacts and maximize economic productivity and opportunity. In the case of joint local government purchasing, a function of many regional planning organizations, it is recommended to have standards that identify and certify green products and their benefits, such as Energy Star or USDA Organic. These standards facilitate local government procurement and use of green products, which supports the growth of green manufacturing jobs and the incorporation of green products into the economy.

We are aware that linking both green products and processes together might be difficult in the early stages of the development of the green economy, but believe it is important to include in your definitions planning activities (including outreach and education) related to the development and implementation of green goods and services. Additionally, we encourage the development of methodologies to calculate and include the green workforce activities conducted by the governmental sector, including federal, state and local governments.

Regional food system planning, a growing area of interest for regional planning organizations across the country, ensures that local and regional food, often organic, can be raised and distributed to consumers and retail outlets within a region, reducing energy use and transportation emissions, while providing healthy food, preserving agricultural land, and supporting the regional economy. We suggest the Bureau of Labor Statistics research and consider the benefits of local and regional food networks in their definitions of green products. Additionally, regional food networks require the distribution of green goods, thus we would recommend the inclusion of sectors related to transportation and warehousing, wholesale trade, retail trade, and real estate and rental and leasing in definitions of the green economy.

Apportioning of Green Employment

NARC supports methodologies (e.g. revenue share) that would allow the U.S. government to calculate the proportional share of jobs related to delivering green products and services to represent the green employment sector.

Regional Examples of Green Jobs

The following examples provide a clearer vision of how green jobs and the green economy are being incorporated at the regional level though the activities of regional planning organizations and their local governments.

Mid-America Regional Council (MARC) is the multi-faceted regional planning organization representing the Kansas City bi-state region (Missouri and Kansas). MARC is a leader in developing Kansas City's Green Impact Zone, an effort to concentrate resources — with funding, coordination, and public and private partnerships — in one specific area to demonstrate that a targeted effort can literally transform a community. This national model for place-based investment is now underway in the heart of Kansas City's urban core and has received significant federal recognition and funding. At the heart of the Green Impact Zone initiative is a project that would put area residents to work weatherizing the 2,500 homes in the zone's neighborhoods. Another piece calls for development of a green bus rapid-transit system that would include bio-diesel buses and green bus shelters. A third piece would provide job training and employment programs for ex-parolees in green building, park restoration and transit work. The Green Impact Zone project will include an employment and training program coordinated both with zone activities and business interests outside of the zone. The Green Impact Zone partners will identify zone residents who need assistance in entering the job market or need to upgrade their position in the market, connect these individuals with programs and opportunities to gain or improve their employment skills, and then connect these individuals to jobs that pay a living wage and offer a career path to long-term employment. For example, plans call for hiring and training people who live in the zone to work on weatherization of homes as part of the energy efficiency strategy.



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Delaware Valley Regional Planning Commission (DVRPC) is the regional planning organization representing the bi-state Philadelphia region (Pennsylvania and New Jersey). DVRPC, through its comprehensive regional planning effort, "Connections," looks to improve the ways the region's governments, businesses and residents create and use energy to result in immediate and lasting benefits for the region, the environment, and the economy. On the most basic level, DVRPC looks to enhance a green economy that will improve the region's air and water quality and reduce our energy costs by thousands of dollars annually. DVRPC looks to building an energy-efficient economy to create a stable supply of local jobs that offer family-sustaining wages, and make us a magnet for new companies eager to maximize performance while minimizing costs. The plan, "Connections," sets out a challenge of reducing greenhouse gas emissions by 50% by 2035. In fact, DVRPC is currently in the process of assessing the importance and location of "eco-enterprises" in the Greater Philadelphia region - an emerging sector comprised of businesses that support and are driven by increased demand for energy-efficient and environmentally friendly products and services. DVRPC is also working with local groups such as the Energy Coordinating Agency and the Center for Energy and Environmental Training to develop green collar workforce development and training opportunities within the region.

Green River Area Development District (GRADD) is the regional planning organization in the Owensboro, Kentucky region and is responsible for many planning and service delivery programs, including workforce training, development and the Workforce Investment Board. From the American Recovery and Reinvestment Act (ARRA), GRADD received the opportunity to expand its workforce development offerings to include a Summer Works youth employment initiative, which would place approximately 170 individuals between the ages of 16 and 24 with public and private employers across the region. The focus of the program is to educate the neediest youth – including out-of-school youth and those most at risk of dropping out, youth in and aging out of foster care, juvenile offenders and those at risk of court involvement, homeless and runaway youth, children of incarcerated parents, migrant youth, Native American youth, and youth with disabilities – with quality work experience that emphasizes "green" industries and registered apprenticeships.

Mid-Ohio Regional Planning Commission (MORPC) is the regional planning commission and metropolitan planning organization (MPO) for Central Ohio, representing 44 local governments and a population of over 1.6 million. MORPC recently developed a Local Food Assessment and Plan that features a strategy for strengthening the economy by ensuring access to healthful food, reducing food-shipping business and preserving farmland – all of which support the green economy. Their plan features 24 recommendations, both short- and long-term, which will help the region meet its goals. The implementation of these recommendations will support the green economy in a variety of ways – including pollution reduction, waste reduction, agricultural and natural resources conservation and education, compliance, public awareness and training – while building and supporting a regional food system.

Conclusion

Thank you for this opportunity to comment on the proposed definitions for green jobs and the green economy, and offer some examples of regional activities. As this is an emerging field, we think it is important to solicit considerable public and private sector feedback on such issues, including the needs of local governments, regions and their communities. We welcome the opportunity to work together and offer NARC and our members as a resource to the Bureau of Labor Statistics. Feel free to contact me directly with questions or for more information at 202.986.1032, x216 or fred@NARC.org.

Sincerely,

Fred Abousleman
Executive Director