Preface

In late 1984, Paul Light, then director of studies at the National Academy of Public Administration (NAPA), hired Steve Cohen to assemble and manage a staff to conduct a study for the Environmental Protection Agency (EPA) of the implementation of the new amendments to the nation's hazardous waste laws. NAPA's Hazardous Waste Management Project was guided by a distinguished panel of academic and professional experts and chaired by Alan Altshuler, one of the nation's eminent scholars in public administration. To provide expert advice to the project, Cohen recruited Sheldon Kamieniecki to join the project as its senior consultant. After one year, NAPA produced a strategic plan for EPA's new underground storage tank (UST) program.

When the project ended, Cohen and Kamieniecki decided to write about the concepts that informed the planning process, the process itself, and the early implementation record of the federal underground tank program. This resulted in a book: *Environmental Regulation Through Strategic Planning* (1991). The authors concluded that at least until the publication of the book, EPA's UST program had been a success.

Throughout the 1990s, Cohen and Kamieniecki continued discussing the issues addressed by that book—principally, How can environmental regulation be made more effective? One issue that dominated these discussions was first raised by Columbia University Professor Richard Nelson during a seminar session that covered the development of EPA's tank strategy: Was the tank program unique? Could strategic planning be of value in other areas?

In continuing this conversation, Cohen and Kamieniecki thought that the next step in this process of exploration would be to take an

environmental program that was failing and examine it for evidence of strategic thinking. This new study would also analyze the potential usefulness of strategic planning for improving the failed program. After considering a number of emerging environmental issues, the issue of methyl tertiary butyl ether (MTBE) contamination seemed a good fit. MTBE was a substance that was added to gasoline to prevent air pollution, and yet it turned out to be a danger to the nation's supply of groundwater. It was a new problem created by an attempt to solve an old problem. Kamieniecki enlisted Matthew Cahn, his former student and now professor of political science at California State University, Northridge, to join the team and help develop a case study on the development and implementation of MTBE policy. Cahn had used Cohen and Kamieniecki's book extensively in his courses and was quite familiar with its theoretical framework and underlying thesis.

Another part of the study was to revisit the original theoretical framework on strategic regulation based on lessons learned in the 1980s and 1990s. We also reexamined the underground tank program to see if the promise it demonstrated in the late 1980s had resulted in performance in the early twenty-first century. Finally, we sought to compare the two processes and see if we still thought that strategic planning could contribute to effective environmental regulation.

Twenty years after NAPA's Hazardous Waste Management Project, we find the process of strategic planning a useful reform to standard environmental policymaking. We also find that it continues to be rare and underused and that the old misguided trade-off between environmental protection and economic growth persists in the halls of government. This misinformed debate is one reason that the stakeholder analysis and engagement that characterized tank regulation would be so useful in other areas. Regulated parties need to understand why they are targeted for change. However, as the MTBE case demonstrates, stakeholder engagement alone is not sufficient for effective policymaking. The other steps of strategic planning are needed to increase the probability of effective regulation.

As policy analysts, we must confess our bias that additional facts and analysis can improve decision making and public policy. We know that there are those who do not agree with us and believe that one result of

analysis is a type of policy paralysis. Still, the alternative to facts and analysis is guessing and magic, and we would just as soon take our chances with policy based on good data and knowledge. We think it is important to document success and failure and learn from both where we can. We offer this new book in the hope that the lessons within it can be applied. Our purpose in writing it is to contribute to making our planet a little more sustainable.