



## OFFICE OF THE MAYOR

August 1, 2025

Commissioner Shawn M. LaTourette  
New Jersey Department of Environmental Protection  
401 East State Street  
Trenton, NJ 08625

### **Re: Response to Letter Dated July 29, 2025 – Trenton Water Works**

Dear Commissioner LaTourette,

I am writing in response to your letter dated July 29, 2025, which, unfortunately, comes at a time when the City of Trenton has been making demonstrable and sustained progress toward improving the operations, infrastructure, and financial health of Trenton Water Works (TWW).

The tone and timing of your letter—coinciding with major legislative reforms and infrastructure initiatives—risk undermining the very efforts that the NJDEP has long demanded. While we fully recognize the Department’s regulatory role, the letter reads less as constructive oversight and more as an attempt to pressure the City into a predetermined outcome, without the due diligence or public engagement that such a consequential decision requires.

As you are aware, TWW has worked cooperatively with the Department for several years. Under my administration, we initiated a multi-year capital improvement plan, retained nationally respected consultants, and launched transparent engagement with our customer municipalities. We also made a structural change long advocated by the Department: elevating TWW from a division within Public Works to an independent department under leadership with deep water system expertise.

Our progress to date includes:

- **Capital Improvement Plan:** TWW has launched a comprehensive capital plan addressing long-standing infrastructure and operational issues identified both internally and by DEP. This includes key projects such as flusher assembly installation (90% completed), the completed Sykes/Liberty and West Trenton C&L upgrades, and active investment in asset management and leak detection.
- **Rate Stabilization and Financial Modeling:** We have engaged one of the nation’s leading rate consultants to develop a long-term financial model. Public hearings on proposed rate adjustments will take place this August and September.

- **Detailed Financial and Organizational Review:** Prior to the issuance of your Department's consultant report, we had already commissioned and completed a rigorous organizational and financial audit. That report—shared with your staff in advance—mirrored many of your consultant's later conclusions and recommendations. Implementation of those recommendations is already underway, and we continue to await additional guidance from the Department.
- **Legislation Pending Before Council:**
  - An ordinance imposing a service fee for meter removal, consistent with cost-recovery recommendations.
  - An ordinance exempting TWW from municipal residency requirements to expand the pool of qualified staff.
- **Intermunicipal Engagement:** These reforms have been shared and discussed in open dialogue with the mayors of our customer communities.

Despite this progress, your letter appears to disregard the strides being made and instead calls for immediate regionalization—without first conducting the public process that would ensure fairness, transparency, and informed consent.

Let me be clear: I have long supported a *study* of potential regionalization—not a mandate, because I believe that we need to have the best possible understanding of the options available to the city as it moves forward. **Any restructuring of Trenton Water Works can only be authorized by the Trenton City Council, which is the sole entity empowered to make that determination.** I support providing Council with any and all data necessary to assist them in making a fully informed decision on behalf of our residents.

**The timing of the Department's letter is also noteworthy.** You yourself have acknowledged that any study of regionalization could take up to 18 months—yet there is no clear articulation of what Trenton would receive or what surrounding municipalities would pay for TWW's assets. Instead, we are met with what appears to be a public pressure campaign aimed at forcing the City into surrendering control of its water utility. While we share DEP's commitment to public health—and note that even DEP has never declared Trenton's water unsafe—we will not allow ourselves to be bullied into handing over our utility to satisfy the calendar of an outgoing administration.

We remain committed to improving water delivery and public trust. But Trenton deserves partnership, not coercion. Any restructuring must be the product of careful study, not political expediency.

**Attached as Appendix A is a summary of recent capital projects undertaken by TWW. These accomplishments represent real progress and should be recognized as part of any honest assessment.**

**Nonetheless, we look forward to your and your team's presentation—along with that of the other service municipality mayors—before City Council on August 7th.** We trust that forum will provide the appropriate venue for transparency, accountability, and meaningful public engagement.

We ask that the Department return to a spirit of collaboration that respects the hard work already underway, and the community we both serve.

Yours very truly,

A handwritten signature in black ink, appearing to read 'W. Reed Gusciora', with a stylized flourish at the end.

W. Reed Gusciora  
Mayor