

Integrity Monitor Report
Category 3

Integrity Monitor Firm Name: Vander Weele Group^{LLC}
Quarter Ending: 06/30/2025
Expected Engagement End Date: 12/31/2026

A. General Info

1. Recovery Program Participant:

New Jersey Department of Environmental Protection (NJDEP)

2. Federal Funding Source (e.g. CARES, HUD, FEMA, ARPA):

American Rescue Plan Act (ARPA)

3. State Funding Source (if applicable):

N/A

4. Deadline for Use of State or Federal Funding by Recovery Program Participant:

December 31, 2026

5. Accountability Officer:

Stephen Matis

6. Program(s) under Review/Subject to Engagement:

Middlesex Reservoir Reclamation Project

7. Brief Description, Purpose, and Rationale of Integrity Monitor Project/Program:

The State of New Jersey received \$6,244,537,955.50 in Coronavirus State Fiscal Recovery Funds under the *American Rescue Plan Act (ARP CSFRF)*. The New Jersey Department of Community Affairs is the prime recipient of the *ARP CSFRF* funding and has passed it through to the NJDEP via a Memorandum of Understanding (MOU), executed on October 30, 2023, and an amendment to that MOU, executed on May 6, 2024. The NJDEP received \$30 million in *ARP CSFRF* funding for the Middlesex Reservoir Reclamation Project. Per the engagement query for this integrity monitorship, the \$30 million in funding is

Integrity Monitor Report
Category 3

budgeted as a pass-through grant to Union County for the contractual work on this project.

The NJDEP describes ongoing flooding of the Rahway River and its tributaries to have exacerbated critical siltation and sedimentation issues. These issues have impacted the former Middlesex Water/Clark Reservoir (Reservoir), which could lead to irreversible damage and loss of the Reservoir.

Two phases are expected throughout the contractual work, including dredge improvement in Phase One and park development and improvement in Phase Two.

The purpose of this engagement is to perform a risk assessment and retrospective review of the grant agreement and forthcoming amendment(s) between the NJDEP and Union County to determine the latter's compliance with applicable Federal rules, laws, and regulations. Additionally, the integrity monitor (IM) will review and report on the contracts Union County has procured to ensure its compliance with applicable state and Federal procurement regulations and to verify that the associated invoices, change orders, and payments fall within applicable regulations. Furthermore, the integrity monitor will monitor Union County's management of the Reservoir project for any indicia of fraud, waste, abuse, or mismanagement of the funds.

8. Amount Allocated to Program(s) under Review:

\$30,000,000

9. Amount Expended by Recovery Program Participant to Date on Program(s) under Review:

Payment to Union County in the amount of \$70,568.

NJDEP administrative costs for NJDEP staff salary coding in the amount of \$6,829.68

10. Amount Provided to Other State or Local Entities:

Payment to Union County in the amount of \$70,568.

11. Completion Status of Program (e.g. planning phase, application review, post-payment):

**Integrity Monitor Report
Category 3**

Review of procurement process and grant agreement.

12. Completion Status of Integrity Monitor Engagement:

In process

B. Monitoring Activities

13. If FEMA funded, brief description of the status of the project worksheet and its support:

a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

14. Description of the services provided to the Recovery Program Participant during the quarter (i.e. activities conducted, such as meetings, document review, staff training, etc.):

a) IM Response

- 1.) Attended Microsoft Teams meetings with Union County and NJDEP staff on 04/29/2025, 06/03/2025 and 6/27/2025.
- 2.) Prepared a summary version of the risk assessment and submitted it to Union County on 05/06/2025.
- 3.) Finalized the compliance matrix.
- 4.) Monitored procurement activity status for selecting a contractor.
 - a) The New Jersey Office of the State Comptroller (OSC) approved the invitation to bid advertisement on 04/09/2025.
 - b) Union County's engineer provided an updated cost estimate on 04/14/2025, with a total project cost of \$36,988,380.00.
 - c) Union County scheduled the invitation to bid in the *Star Ledger* newspaper for 04/17/2025. No pre-bid informational meeting is scheduled.
 - d) Union County listed the invitation to bid on its website on 04/17/2025 with bids due on 5/29/25. Union County expects to award the contract in mid-June.

**Integrity Monitor Report
Category 3**

- e) On 05/14/2025, Union County issued its first addendum to include questions and answers.
 - f) On 05/19/2025, Union County issued a second addendum to include questions and answers.
 - g) The IM attended the opening of the sealed bids for the project on 05/29/2025. Union County received and opened eight bids for the project. None of the three lowest bids identified fell within the budget/independent cost estimate. To lower the bid Union County deleted three “provisional” items (identified in the invitation to bid) from the project price lines.
 - h) The IM met with Union County on 06/09/2025 to discuss the results of the bidding process and provide clarification. Union Paving and Construction was the lowest bidder at approximately \$41.8 million. Factoring in the three deleted price line items totaling \$3.4 million made the lowest bid approximately \$38.4 million. Union County will use funds from its capital account to cover the gap between the budget and bid amount.
 - i) The pedestrian footbridge was one of the three items deleted from the project’s price lines, which Union County intends to rebid separately.
 - j) At their meeting on 6/12/2025, the County Commissioners approved the award of \$38,410,439.01 to Union Paving and Construction.
 - k) Union County expects Union Paving and Construction to begin work in mid-July 2025. The actual dredging process will not begin until October 2025.
- 5.) Finalizing the review of the procurement process.
- 6.) The amendment to the grant agreement was fully executed as 06/05/2025.
- 7.) Drafting the review of the amendment to the grant agreement).

b) Recovery Program Participant Comments

Agree with IM Response

15. Description to confirm appropriate data/information has been provided by the Recovery Program Participant and description of activities taken to review the project/program:

a) IM Response

Union County described the complete contract award process. Union County provided the bid forms for the eight bids received for the project, including the revised bids for the three lowest bidders and all documentation attached to the contract award.

**Integrity Monitor Report
Category 3**

b) Recovery Program Participant Comments

Agree with IM Response

16. Description of quarterly auditing activities conducted to ensure procurement compliance with terms and conditions of contracts and agreements:

a) IM Response

Please see question 14 above for details as to the procurement review activity for selecting a contractor.

b) Recovery Program Participant Comments

Agree with IM Response

17. If payment documentation in connection with the contract/program has been reviewed, provide description.

a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

18. Description of quarterly activity to prevent and detect waste, fraud, and/or abuse:

a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

19. Details of any integrity issues/findings, including findings of waste, fraud, and/or abuse:

a) IM Response

N/A

**Integrity Monitor Report
Category 3**

- b) Recovery Program Participant Comments

N/A

- 20. Details of any other items of note that have occurred in the past quarter:

- a) IM Response

At their meeting on 06/12/2025, the Union County commissioners reappointed Bibi Taylor as the chief financial officer for Union County, for another three-year term, effective August 1, 2025.

- b) Recovery Program Participant Comments

Agree with IM Response

- 21. Details of any actions taken to remediate waste, fraud, and/or abuse noted in past quarters:

- a) IM Response

N/A

- b) Recovery Program Participant Comments

N/A

C. Miscellaneous

- 22. List of hours (by employee) and expenses incurred to perform quarterly integrity monitoring review:

- a) IM Response

Dr. Kristen Mokofisi — 2.75
Elizabeth Mackay — 61.50
Rick Duran — 45.65
Sophia Staveris — 43.55
Bianca Joseph — 33.90
Rene Alaniz — 166.25
Katherine Larson — 75.75
Christina Evans — 4.50

**Integrity Monitor Report
Category 3**

Sydney Long — 4.75

b) Recovery Program Participant Comments

Agree with IM Hours

23. Add any item, issue, or comment not covered in previous sections but deemed pertinent to monitoring program:

a) IM Response

N/A

b) Recovery Program Participant Comments

N/A

Name of Integrity Monitor:	Vander Weele Group ^{LLC}
Name of Report Preparer:	Sophia Staveris
Signature:	<i>Sophia Staveris</i>
Date:	07/10/2025