

**Integrity Monitor Report  
Category 3**

Integrity Monitor Firm Name: Vander Weele Group<sup>LLC</sup>/Joseph A. DeLuca Advisory & Consulting Services<sup>LLC</sup>  
Quarter Ending: 09/30/2025  
Expected Engagement End Date: 10/31/2025

**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:

[(1) Greenway Acquisition, Remediation and Development  
(2) Liberty State Park Revitalization Project  
(3) Water Infrastructure Program [Clean Water State Revolving Fund (CWSRF) Projects and Drinking Water State Revolving Fund (DWSRF) Projects]

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 (CSFRF) under *ARPA*. A description, purpose, and rationale for each of the three programs included within this integrity monitorship are as follows:

(1) Greenway Acquisition, Remediation, and Development—The purpose of this engagement is to monitor the \$67,000,000 in *ARPA* CSFRF funding the NJDEP

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received for the acquisition, remediation, and development of the Greenway. This project sees the conversion of an approximate nine-mile, 100-foot-wide blighted corridor into a thriving recreation and transportation corridor spanning eight municipalities in Essex and Hudson Counties. The NJDEP funding is budgeted as \$20 million towards the direct acquisition of the property, \$45 million for remediation and development costs, and \$2 million in NJDEP administrative costs.

(2) Liberty State Park Revitalization Project—The purpose of this engagement is to monitor the \$52,500,000 in *ARPA* CSFRF funding the NJDEP received to implement immediate upgrades to Liberty State Park, as well as to cover a portion of planning and design costs for future upgrades.

(3) Water Infrastructure Program—The purpose of this engagement is to monitor the \$302,300,000 in *ARPA* CSFRF funding the NJDEP received for several different water infrastructure initiatives, including CWSRF Projects and DWSRF Projects. The Water Infrastructure Program is a partnership between the NJDEP, the New Jersey Water Bank (NJWB), and the New Jersey Infrastructure Bank (I-Bank). It is budgeted to provide principal forgiveness loans to support communities.]

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

[ (1) Greenway Acquisition, Remediation, and Development—\$67,000,000  
 (2) Liberty State Park Revitalization Project—\$52,500,000  
 (3) Water Infrastructure Program—\$302,300,000 ]

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

1. Greenway Acquisition, Remediation, and Development—\$27,756,678.24  
 Amount Paid to EDA - \$10,655,500.00

2. Liberty State Park Revitalization Project—\$—\$7,109,740.05  
 Amount Paid to EDA - \$6,666,666.66

3. Water Infrastructure Program—\$41,757.40

10. Amount Provided to Other State or Local Entities:

[N/A]

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

[Construction Phase]

12. Completion Status of Integrity Monitor Engagement:

[Project Completion Phase]

**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

**Greenway Acquisition, Remediation, and Development**

1. Attended biweekly meetings with the NJDEP, as well as internal meetings with the IM's subcontractor, Joseph A. DeLuca Advisory & Consulting Services<sup>LLC</sup>, and the NJDEP.
2. Requested and reviewed a list of up-to-date expenditures to determine whether they align with procurements and whether procurements comply with applicable state and federal regulations. The NJDEP is gathering vendor-specific documentation for expenditures selected for review.
3. Reviewed the documentation the NJDEP provided regarding the Greenway Acquisition invoices to facilitate the reconciliation of invoice payments for the selected disbursement reviews.
4. Updated the status schedule to track the progress of disbursement reviews.
5. Reviewed the documents the NJDEP provided in connection with the contractor and subcontractor reimbursement requests. For the past

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year of invoice reviews, we have noted gaps in the labor cost documentation, such as missing time sheets or equivalent records to substantiate hours worked, personnel involved, and tasks both the prime contractor and subcontractors performed. We have requested additional supporting documentation to clarify and validate the amounts submitted for reimbursement, but we have been provided with minimal or incomplete documentation to substantiate costs from some subcontractors. As such, the NJDEP has requested our support in developing a guidance document to provide to contractors and subcontractors to ensure all stakeholders are maintaining adequate documentation to be provided upon request by future monitors or auditors.

6. Completed the second on-site visit and prepared detailed notes based on observations.
7. Drafting the Completion Report for the project's closeout.
8. Drafting the New Jersey Department of Environmental Protection Guidelines for Grant Programs Supporting Documentation.
9. Drafted the monthly and quarterly reports for September 2025.

### **Liberty State Park Revitalization Project**

1. Attended biweekly meetings with the NJDEP, as well as internal meetings with the IM's subcontractor, Joseph A. DeLuca Advisory & Consulting Services<sup>LLC</sup>, and the NJDEP.
2. Requested and reviewed a list of up-to-date expenditures to determine whether they were aligned with procurements and whether procurements complied with applicable state and federal regulations.
3. Reviewed the documentation the NJDEP provided regarding the Liberty State Park invoices to facilitate the reconciliation of invoice payments for the selected disbursement reviews.
4. Updated the status schedule to track the progress of disbursement reviews.
5. Reviewed the documents the NJDEP provided in connection with the contractor and subcontractor reimbursement requests. For the past year of invoice reviews, we have noted gaps in the labor cost documentation, such as missing time sheets or equivalent records to substantiate hours worked, personnel involved, and tasks both the prime contractor and subcontractors performed. We have requested additional supporting documentation to clarify and validate the amounts submitted for reimbursement, but we have been provided with minimal or incomplete documentation to substantiate costs from some subcontractors. As such, the NJDEP has requested our support in developing a guidance document to provide to contractors and subcontractors to ensure all stakeholders are maintaining adequate documentation to be provided upon request by future monitors or auditors.

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6. Completed the second on-site visit and prepared detailed notes based on observation.
7. Drafting the Completion Report for the project's closeout.
8. Drafting the New Jersey Department of Environmental Protection Guidelines for Grant Programs Supporting Documentation.
9. Drafted the monthly and quarterly reports for September 2025.

**Water Infrastructure Program**

1. Attended biweekly meetings with the NJDEP, as well as internal meetings with the IM's subcontractor, Joseph A. DeLuca Advisory & Consulting Services<sup>LLC</sup>, and the NJDEP.
2. Requested additional fiscal and compliance documentation based on our review of the loan applications and all documentation provided within the H2LOans system.
3. Provided the NJDEP with an updated status schedule on the loan reviews.
4. Using a developed status schedule to track the progress of loan reviews.
5. Monitored and completed initial fiscal and compliance reviews of all loan applications.
6. Drafting the Completion Report for the Water Infrastructure project.
7. Drafted the monthly and quarterly reports for September 2025.

b) Recovery Program Participant Comments

DEP Agrees 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

1. Conducted procurement sampling and reviews across the Greenway, Liberty State Park, and Water Infrastructure programs. Our risk sampling approach to select expenditures for review uses the Likert scale, which allows us to incorporate key areas of potential risk into program application sampling.
2. Reviewed documents provided to date for all three projects for the procurement review portion of the monitoring engagement to determine whether the invoice, payment, and procurement processes have complied with the standard regulations.

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3. Discussed the Water Infrastructure Program with the NJDEP bureau chief to understand the statuses of active and pending projects including *ARPA* funds used to date.
4. Received expenditure and invoice documentation for the Greenway and Liberty State Park projects to determine allowability and alignment with applicable regulations. Followed up with the NJDEP on current expenditure projections for each program. The NJDEP updated the NJDCA, stating the following for each project:
  - “Water Infrastructure – the entirety of the \$295m has been earmarked for Clean Water and Drinking Water Infrastructure projects, supported by loans through the Water Bank. The funds for these projects will be converted to expenditures at the time of long-term loan closings, scheduled for June 2025, December 2025, June 2026, and December 2026. To date, approximately \$65m of costs, earmarked to be supported by ARP funds, have been incurred. At the first closing in June 2025, there is only one ARP associated loan scheduled to convert to long-term, for about \$700k, so you won’t see a huge expense then either. We will work on preparing a schedule to identify the amounts at the remaining closings. We are confident that the full amount of ARP funds allocated to the Water Infrastructure program will be used.”
  - “Greenway – We anticipate to break ground on the Greenway in July. As such, construction costs will start accumulating and expenditures should start to increase significantly.”
  - “Liberty State Park – construction in several areas of the Park are expected to start in Spring/Summer 2025. As such, constructions costs will start accumulating and expenditures should start to increase significantly. Additionally, we will be making a \$20m payment to US Army Corp of Engineers.”
5. Sent the selected disbursement samples that are currently under review to the NJDEP. In addition, we collaborated with the NJDEP to gather relevant documentation to substantiate the disbursement payments and ensure that all necessary information is provided for a thorough review process.
6. During the previous quarterly report for Q2, the NJDEP provided the following response “With respect to Liberty State Park, we no longer anticipate using ARP funding to make the \$20m payment to the US Army Corp of Engineers as their work has been delayed and is not expected to start until Spring 2027.” This has caused an additional concern to ensure *ARPA*

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funding is expended by December 31, 2026. Our findings and recommendations will be included within our project completion report.

b) Recovery Program Participant Comments

DEP Agrees 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

Reviewed documents provided to date for all three projects for the procurement review portion of the monitoring engagement to determine whether the invoice, payment, and procurement processes have complied with the standard regulations. There were no additional procurements included for our review as of the previous quarterly report.

b) Recovery Program Participant Comments

DEP Agrees with IM Response

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

a) IM Response

We are reviewing payment documentation for the Greenway and Liberty State Park projects, which includes expenditure documentation attached to disbursements the NJDEP provided vendors. We have finalized our review of the Water Infrastructure Program through the H2LOans system and are drafting the project completion report.

b) Recovery Program Participant Comments

DEP Agrees with IM Response

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

a) IM Response

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We have not yet noted evidence of waste, fraud, and/or abuse for the Greenway, Liberty State Park, or Water Infrastructure projects. We will monitor evidence of waste, fraud, and/or abuse throughout the remainder of the engagement. We hold discussions with the NJDEP on the low total expenditure amounts for each project with the NJDEP. The NJDEP updates us on the status of expenditures for each project and their support to expend within the applicable project period for *ARPA*.

b) Recovery Program Participant Comments

DEP Agrees with IM Response

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

a) IM Response

[We have not yet detected findings of waste, fraud, and/or abuse to date. However, we have expressed concern with the total expenditure amount per project to ensure that each project allocation is expended within the applicable time frame established through *ARPA*. The NJDEP informs us about expected spend down and applicable timeframes. As indicated above, the NJDEP followed up with the NJDCA in March on its current expenditure progress for the spring and summer 2025. Our no cost modification to extend our engagement through October 31, 2025, has allowed us time to review additional expenditures through September 2025, however, there are still minimal expenditures. ]

The NJDEP stated the full \$295 million allocated for Clean Water and Drinking Water Infrastructure projects will be expended through long-term loan conversions via the Water Bank, with closings scheduled in June 2025, December 2025, June 2026, and December 2026. So far, \$65 million in costs have been incurred but there have been minimal expenses at that time. A schedule is being prepared for future closings, and all allocated *ARPA* funds are expected to be fully utilized.

The NJDEP anticipates commencing construction on the Greenway in the fall 2025, which will significantly increase expenditures.

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The NJDEP initially stated that construction for Liberty State Park will start in spring or summer 2025, however, this has also been delayed to the fall of 2025, which should significantly increase the expenditures.

### b) Recovery Program Participant Comments

Revision to \$65 million amount: To date, \$156.2 million in costs have now been incurred that will be realized as part of the future loan closings.

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

### a) IM Response

Throughout our assignment, we have received program expenditure reports for the three projects. As previously stated, the program expenditures have not kept up with originally anticipated program progress. Many factors have impacted program expenditures since the initiation of these programs. Some of these factors include, but are not limited to:

- Supply chain disruptions as the economy recovers from the impacts of COVID-19;
- Resource limitations by internal NJDEP staff and external general contractors, especially as it relates to administrative tasks; and
- Time necessary to collaborate across various divisions within the NJDEP, sometimes including both internal and external parties (for example, needing to collaborate with individuals from I-Bank for the Water Infrastructure program).

While we have noted this on previous quarterly reports, we are working with the NJDEP to review expenditures to date and have extended the integrity monitorship to October 31, 2025, to ensure a well-rounded review of expenditures through September 2025.

Regarding the Water Infrastructure Program, our discussions and collaboration with the NJDEP bureau chief, the chief financial officer, and other senior management representatives of I-Bank have provided us with a broader understanding of the database known as “H2LOans.” H2LOans is a database, owned by the NJDEP but administratively run by I-Bank, which contains all Water Infrastructure Program sponsor application data and forms; I-Bank provides both short- and long-term funding, which the required NJDEP personnel then review and approve.

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b) Recovery Program Participant Comments

DEP agrees with IM Response

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

a) IM Response

1. While the following was noted in previous quarterly reports, it is important to reiterate in this quarterly report due to the overall budgeted requirements for bridge and encroachment concerns. The NJDEP has been working with the New Jersey Office of Transactions and Public Land Administration (NJOTPLA) on encroachment issues and with police to resolve safety concerns. We have also conversed with the New Jersey Transportation Planning Authority (NJTPA) about budgeting concerns to address the safety issues regarding bridge upgrades. The NJDEP has noted that an external evaluation of the bridges was done prior to the acquisition, which showed the suggested repairs or rebuilds necessary as well as cost estimates. The NJDEP acknowledged that these cost estimates were out of date, as this report was completed prior to the acquisition.
  
2. Regarding the Water Infrastructure Program, our ongoing efforts and testing thus far have not indicated instances of fraud, waste, or abuse. We will discuss ways to mitigate and/or reduce instances of waste if they arise. The deadline to obligate *ARPA* funds towards active or pending “project sponsors,” who provide supporting documentation to substantiate progress, was 12/31/2024.

b) Recovery Program Participant Comments

DEP agrees with IM Response

**C. Miscellaneous**

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

a) IM Response

Joseph DeLuca—0.50  
Dr. Kristen Mokofisi—11.00

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Kevin Mullins—8.75  
Sophia Staveris—12.60  
Cassy Good—55.00  
Bianca Joseph—38.00  
Salvatore Ubaldini—38.75

b) Recovery Program Participant Comments

DEP acknowledges the hours are TBD

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<sup>LLC</sup>/Joseph A. DeLuca Advisory &  
Consulting Services<sup>LLC</sup>  
Name of Report Preparer: Bianca Joseph

Signature:  
Date:



10/15/2025