

11 February 2009
To the Ordinary Meeting

Director's Report
Shire Planning Department

4.1 Link Road Project and Associated Matters

TRIM REFERENCE: D01678812

AUTHOR: WW; GK

SUMMARY

This report addresses the issues associated with the planning, design, cost, funding and construction of the Link Road at Warnervale. The report also details the recently announced changes to legislation governing developer contributions and the impact of these changes on the rolling works programme.

RECOMMENDATION

- 1** *That Council endorse the proposal to construct the northern section of the Link Road, subject to Federal Government agreement to the existing Auslink grant funds being re-allocated to that section.*
- 2** *That Council defer the construction of the remaining southern section of the Link Road to manage cashflow implications imposed by the project and to better align with present traffic modelling predictions.*
- 3** *That Council endorse the Director of Shire Services decisions with respect to the variations approved to date for Contract CPA/94531 - Investigation and Design Consultancy - Link Road (Watanobbi to Warnervale) and Trunk Water Main (Mardi Dam to Warnervale) with Connell Wagner Pty Ltd.*
- 4** *That Council approve additional funding to increase the Contract CPA/94531 amount from \$527,026.95 (including contingency amount and excl GST) to \$2,286,704.49 (excl GST).*
- 5** *That Council cancel the proposal for Contract CPA/127795 – Construction of Link Road and Water Main, Watanobbi to Warnervale and decline to accept any tenders received.*
- 6** *That Council endorse the actions taken by staff in responding to recent Section 94 reforms and directions from the Minister for Planning, including the contents of Council's letter to the Department of Planning dated 30 January 2009.*
- 7** *That Council endorse the preparation of a detailed submission seeking to levy contributions above \$20,000 per lot/dwelling under Contributions Plan 7A – Warnervale District and Contributions Plan 3 – the Entrance District.*

BACKGROUND

1 BACKGROUND TO LINK ROAD PROJECT

The Warnervale Planning District has been the subject of significant residential and commercial development in recent years and this growth is expected to significantly increase over the next 20 years with the development of the Warnervale District Centre. The Link Road seeks to improve road transport to accommodate the expected future growth in this area.

Attachment 1 shows the location of the proposed road.

The Link Road has been proposed since the initial zoning of the Warnervale area was carried out in 1993. It has been included in various planning documents, including the Contributions Plan, since that time. The need to improve road transport connections between Warnervale and the Wyong Town Centre has been identified as an important component of the future development of Warnervale and the existing Wyong Town Centre. In this regard, the proposed road will provide a direct link between these areas, ensuring the existing local and state road network can accommodate the increase in traffic volumes, as well as providing a more efficient transport corridor for bus servicing. Without the proposed road there would be a dependence on the existing road network to accommodate the increase in local traffic expected to be generated by development in the Warnervale Planning District. This would be likely to result in the Pacific Highway between Britannia Drive at Watanobbi and Sparks Road at Warnervale experiencing extended periods of peak congestion during the day. This would potentially lead to increased traffic on local roads such as Minnesota Road, Warnervale Road and Pollock Avenue, as traffic attempts to avoid delays around Wyong North and the Wyong Town Centre. Lack of the proposed road at the northern end would mean that access to the already zoned education land would have to be provided through existing residential streets in Warnervale Village.

In summary, the objectives of the Link Road project are to:

- i) Ensure that the local and regional road network has the capacity to safely handle the increased traffic generated by the current and future development within the Warnervale Planning District;
- ii) Provide an efficient transport corridor for bus servicing;
- iii) Assist in the promotion of development within the Warnervale Planning District.

The Link Road has been part of previous Council briefings regarding infrastructure projects and the effect of proposed and subsequent developer contribution legislation changes.

2 LINK ROAD PLANNING AND DESIGN ISSUES

2.1 Initial Link Road Concept Design and Planning Approval

The initial concept design for the Link Road was based on shallow cuttings and an earth fill embankment encroaching on the edge of the Porters Creek wetland, with culverts directly opposite the existing culverts under the Northern Railway. At the time this concept was expected to be the least-cost construction option for the road.

The earth fill embankment adjacent to the wetland could not be accommodated within the 20 metre wide road reserve and encroached into the State Environmental Planning Policy 14 (SEPP 14) wetland of Porters Creek. Construction of the proposed road is defined as Designated Development requiring an Environmental Impact Statement (EIS) under Part 4 of the

Environmental Planning and Assessment Act 1979 (EP & A Act). A Part 4 application and supporting EIS was completed and submitted to Council in 2005. Prior to determination, the road concept design was altered to avoid encroachment into the SEPP 14 wetland, but assessment remained under Part 4. The altered concept to remove this encroachment was for vertical reinforced earth walls to be provided, up to one kilometre long, on both sides of the road, to keep the road footprint outside the wetland on the western side and the Northern Railway on the eastern side of the road.

Council resolved at the Ordinary Meeting of 14 December 2005 to approve this application subject to appropriate conditions. Consent was issued by Council on 19 December 2005 and included 75 conditions. Many of these conditions were to mitigate potential impacts of the road on the SEPP14 wetland and presented significant design and engineering challenges to the project.

2.2 Increased Scope of Link Road Project

A consultancy contract for detailed design and documentation of the Link Road together with a trunk water pipeline (CPA 94531) was awarded to Connell Wagner Pty Ltd in December 2005.

As the investigations and designs were developed for the vertical reinforced earth wall concept, geotechnical investigations undertaken by the consultant indicated extremely poor ground conditions adjacent to Porters Creek wetland within the road reserve. As a result, engineering foundation solutions necessary to minimise potential settlement between the reinforced earth walls and the major culvert structures (required through the walls) were required. These were found to be very costly. It became apparent that, although not initially under consideration as a possible least-cost solution, the option of a bridge would need to be investigated.

The bridge option mitigated issues of environmental impact as well as the poor foundation conditions through the wetland. Connell Wagner was instructed to undertake further investigations and design for various bridge options, to enable final comparison of the benefits and disadvantages (on both cost and non-cost criteria) of different bridge types versus the reinforced earth embankment option. This situation required considerable additional investigation and design effort by the consultant, with resultant significant increased costs of the consultancy contract.

Attachment 2 details the current status of the consultancy contract with Connell Wagner.

Final analysis confirmed that the most cost-effective, least-risk engineering and environmental solution was a 442 metre long incrementally launched, post-tensioned, continuous section girder bridge, at an estimated construction cost of approximately \$14.0 million (excl GST). A notable example of this type of bridge is the "Sea Cliff" bridge just south of Stanwell Park on the Grand Pacific Drive (60 km south of Sydney).

With inclusion of the bridge in lieu of the vertical reinforced earth walls, the project no longer needed to be considered under Part 4 of the EP & A Act, as the bridge avoided encroachment into the SEPP 14 wetland. Legal advice recommended seeking approval of the amended project under Part 5 of the Act and the Part 4 approval was subsequently surrendered. The required environmental investigations for a Part 5 determination have been completed,

documented and submitted. The Part 5 application for the northern section of the road was approved by internal delegation dated 4 February 2008, however the Part 5 determination for the southern section of the road will need to be the subject of a separate report to Council. Assessment for this report has been put on hold as a result of the ongoing overall project delays.

As detailed design progressed, significant costs to relocate existing utility services affected by the road construction were identified. These were estimated to cost approximately \$1.7 million (excl GST).

In addition, the Roads and Traffic Authority (RTA) required more extensive improvements, at considerable extra cost, to the intersections with Sparks Road and the Pacific Highway at each end of the Link Road. These changes are estimated to add approximately a further \$1.5 million (excl GST) to the project.

2.3 History of Link Road Cost Estimate

As investigations and design for the project have developed, the extensive environmental, geotechnical and engineering challenges presented by the project, identified in the previous Section 2.2, resulted in significant increases in the project scope and continually escalating project costs.

A history of the project cost increases is shown in Table 1.

Table 1 History of Cost Estimates

Timeframe	Estimated Cost (\$million, excl GST)
2004 - funding application to Auslink Program – based on earth fill embankment concept design	\$16.0
2005 - based on EIS outcomes and earth fill embankment concept design	\$18.5
2007 - funding application to Auslink Program – based on preliminary cost of reinforced earth wall options (\$8.7 million) through SEPP 14 wetland	\$25.5
October 2007 - pre-tender estimate with RTA intersection requirements (\$1.5 million), service relocation costs (\$1.7 million) and cost of adopted bridge option	\$33.0
December 2007 - construction tenders received (indicative costs)	\$31.3
December 2007 - total project cost based on indicative construction tenders, investigation and design, project management, service relocations and 10% construction contingency	\$37.5

2.4 Link Road Traffic Modelling

Planning for the time to construct the Link Road has been based on the need established by traffic modelling. This modelling to date has indicated the full length of the Link Road needed to be constructed in the short term. However,

recent modelling carried out by the RTA, in conjunction with Council, has indicated that a longer term timeframe is possible.

In summary, this modelling exercise suggests that Council should plan to construct the Link Road so that its full length is operational from 2024/25. This has significant beneficial implications for Council's ability to manage the cashflow requirements for this project.

2.5 Link Road Cost Apportionment with the RTA

Based on the traffic modelling carried out, it is reasonable to apportion the costs for the Link Road based on the volume of "regional traffic" to the RTA and based on the volume of "local traffic" to Council.

The RTA had requested during the design process for the Sparks Road/Link Road intersection that the intersection be designed to suit the ultimate Sparks Road arrangement of three travelling lanes (plus turning lanes) in each direction. This increases significantly the cost of the intersection. Existing conventions for the apportionment of costs are for the RTA to bear the cost of replacement of the area of existing pavement, including shoulders, and for Council to be responsible for the additional turning lanes.

Based upon the above, it is reasonable that the RTA be responsible for:

8% of the cost of the Link Road if the Pacific Highway is upgraded to dual carriageway by 2024/25;
35% of the cost of the Link Road if the Pacific Highway is NOT upgraded to dual carriageway by 2024/25; and
70% of the cost of upgrading of the Sparks Road intersection.

In cost terms (in today's dollars), this means that the RTA should be responsible for approximately:

\$5.3 million (excl GST) if the Pacific Highway is upgraded; and
\$15.5 million (excl GST) if the Pacific Highway is NOT upgraded,
of the current estimated Link Road project cost of \$37.5 million (excl GST).

3 LINK ROAD FUNDING OPTIONS

It is intended that the project should be funded from three sources:

3.1 Federal Government Grants

Council has secured funding in a total amount of \$5.5 million (excl GST) from the Federal Government towards the project, under the Auslink Strategic Regional Program. Funding exists under the following two rounds of the program:

2004 round, \$2.5 million (excl GST), program expiry 30 June 2009
2007 round, \$3.0 million (excl GST), program expiry 30 June 2010.

The \$3.0 million (excl GST) from the 2007 round has been paid to Council already. The \$2.5 million (excl GST) from the 2004 round will be reimbursed to Council as project expenditure exceeds the initial \$3.0 million (excl GST) payment.

Due to the 14 month delay to the project from the uncertainty surrounding the eligibility of the project to receive funding from developer contributions (refer to Section 5 of the report), it is impossible to resurrect the project in time to meet the deadlines for expiry of the 2004 funding and likewise difficult to achieve for the 2007 funding.

The General Manager recently met with representatives from the Federal Government to discuss the present situation and explore options to maintain the funding despite the imminent expiry of the program (particularly the 2004 round of funding). The most viable option appeared to be to request approval for a project variation to 'de-scope' the project to construct, in the short term, only the northern 900 metre long section of the Link Road adjacent to Lakes Grammar School, including the intersection improvements with Sparks Road.

A proposal on this basis has been submitted to the Federal Government. This proposal is predicated on the assumption that Council will endorse the staging of the project to construct only the northern 900 metre long section of the Link Road in the short term. The Federal Government representatives undertook to attempt to obtain a decision on Council's proposal from the relevant Minister by approximately mid-February 2009.

3.2 Possible State Funds Through the RTA

Based on the apportionments discussed in Section 2.5, the possible funding contribution from the RTA towards the construction of the project is estimated at approximately \$5.3 million (excl GST) if the Pacific Highway is upgraded and \$15.5 million (excl GST) if the Pacific Highway is not upgraded.

The RTA is yet to provide any firm commitment to funding of the Link Road project and has consistently refuted that it is required to contribute to major road infrastructure projects that have been identified in developer contributions plans. As can be seen from the traffic modelling for the Link Road, there is a percentage of traffic using the road that is attributed to "regional traffic" rather than "local traffic". Council's position is that this regional component should be funded by the RTA. Council has received legal advice that supports the current and past practice of including the RTA apportionment in developer contribution plans.

3.3 Developer Contributions

Since 2007, the State Government has made numerous announcements relating to the proposed changes to the legislation that governs developer contributions. These announcements often contained conflicting advice and always contained significant information gaps. Council has made many written and personal representations to the Department of Planning seeking clarification of various matters, but these information gaps still exist.

In June last year, the State Parliament passed new legislation; however, this has not yet been enacted.

Due to lack of a clear direction from the State Government on the issue of developer contributions, there has been considerable uncertainty as to the eligibility of the Link Road project to be funded by developer contributions. This has led to the project being stalled for a period in excess of 14 months. Developer contributions are the principal source of funding for the project.

The Department of Planning has recently advised that Council will be permitted to collect developer contributions for the Link Road, subject to the costs being correctly apportioned. However, if the RTA does not fund its apportionment identified above in Section 3.2, then Council must also fund that amount.

Since receiving this advice, the Department of Planning has also announced that it will 'cap' developer contributions at \$20,000 per lot/dwelling and Council will need to seek the Minister's approval to levy contributions above this amount. If contributions are capped at \$20,000 per lot/dwelling, Council could lose in excess of \$40 million in section 94 income in the currently residential areas of the suburbs of Woongarra, Hamlyn Terrace and Wadalba and in excess of \$80 million in the greater Warnervale Area, including the future Town Centre and Precinct 7A.

Further background on this matter is presented in Sections 5 and 6 of this report.

3.4 Summary

The current estimated project cost, based on construction tenders received on 13 December 2007, is \$37.5 million (excl GST).

Assuming the Federal Government agrees to maintain the present Auslink funding for the proposed project variation and the funding identified above is agreed to by the RTA, the project is intended to be funded from the following sources:

Funding Source	Pacific Highway Upgraded by RTA (\$million, excl GST)	Pacific Highway Not Upgraded by RTA (\$million, excl GST)
Federal Government grant funds	5.5	5.5
State Government/RTA contribution	5.3	15.5
Section 94 developer contribution	26.7	16.5
TOTAL	37.5	37.5

4 LINK ROAD STAGING OPTIONS

4.1 Cash flow Implications

The Link Road has always been couched in terms of two stages, with the first stage being the northern section, approximately 900 metre in length. The construction of the second stage, being the southern 2,300 metre long section, was planned to closely follow once the planning approval for that section was granted.

There are significant cashflow implications for Council presented by this project. Given that income from developer contributions is collected over time as development in the contributing catchments occurs, it is problematic for Council (in terms of cashflow) to bankroll the initial funding of a project estimated at approximately \$37.5 million (excl GST). Developer contributions for the project will continue to be collected over the next 25 years from future Warnervale – Wadalba development precincts.

Other than utilising the available grant funds from the Federal Government (that are intended for the full length of the Link Road), the main driver for construction of the Link Road is to provide access to approximately 32 hectares of Council owned land to the south of Lakes Grammar School to facilitate the sale and development of that land. The proceeds from the sale of this land will be put

towards funding of the Link Road at the earliest possible time to assist cashflow for the project. The construction of the northern section of the Link Road will also provide access to the senior campus of the school from the new Link Road. At present the school continues to use temporary arrangements off the end of Aldenham Road to provide access to the senior campus for heavy vehicles only.

The locality plan at Attachment 1 shows the extent of the Council owned land.

Council would experience severe cashflow problems created by early construction of the full length of the road at a time when insufficient developer contribution income has been received and before obtaining funding from the RTA. The preferred position now is to delay construction of the southern section of the road until such time that the cashflow implications can be prudently managed.

4.2 Proposed Timeframes

Given there are no RTA funds committed to the project at present and there are other priorities for the use of developer contributions (e.g. Performing Arts Centre, Aquatic Centre, Sporting Fields, Community Centres, etc.), the existing cash flow model identifies that construction for the entire Link Road project can be accommodated around 2021/22. This timeframe aligns with the latest traffic modelling, which indicates a need for the full length of the Link Road to be operational from 2024. This cashflow modelling assumes that the project is not staged and is constructed as a single project.

If the project is staged, as presently proposed, with the northern section being constructed first, it is estimated that approximately \$4.5 million (excl GST) of developer contributions would be required in the short term (assuming no RTA contributions). Cash flow modelling indicates that this level of funding may be feasible, subject to Council obtaining Ministerial approval to continue to levy developer contributions at a level above \$20,000 per lot/dwelling. Further information on the developer contributions cashflow model is presented in Section 6 of this report.

4.3 Economic Benefits

Although it will be to a reduced scope, constructing the northern section of the Link Road still returns significant economic benefits to the region. This section would service both the junior and senior school campuses of Lakes Grammar but more importantly provide access to a significant area of Council owned developable land to the south of the grammar school. This land is presently zoned 5(a) for educational purposes but is presently part of the 7A Precinct review being undertaken by Future Planning to rezone some of the land 4(e) for commercial and industrial development. The area of land is approximately 32.7 hectares and up to 20 hectares may be developable (there are constraints due to proximity to Porters Creek wetland and bushfire). The return to Council from this land could be in the order of \$32 million (less development costs). Development of the land may generate significant economic and employment prospects for the region. The proceeds from sale of this land will be put towards funding of the Link Road project at the earliest possible time to assist cashflow for the project.

4.4 Impact on Federal Grants

The project variation proposal submitted to the Federal Government identifies that it will still not be possible to expend the 2004 round grant funding of \$2.5 million (excl GST) by the due date of 30 June 2009. Nonetheless, in anticipation

of a favourable response to this proposal, the existing tender documents for the full length of the road, for which Council has previously called tenders, are being "re-packaged" to enable the calling of fresh tenders for just the northern section of the Link Road, by approximately mid-February 2009. This would enable award of a construction contract in June 2009 and completion of construction of the northern section in approximately March 2010, satisfying the expiry date of the 2007 round grant funding of \$3.0 million (excl GST).

Council has been prepaid the \$3.0 million grant and the present agreement with the Federal Government is to expend this funding before receiving the \$2.5 million grant. Council has presently expended about \$1.5 million of the \$3.0 million prepaid amount. Because the \$2.5 million grant expires first, the submission to the Federal Government requests approval for further project expenditure to be met from the \$2.5 million grant to expend it at an earlier date than otherwise achieved by continuing to meet expenditure from the \$3.0 million prepaid grant.

5 SIGNIFICANT CHANGES TO LEGISLATION GOVERNING DEVELOPER CONTRIBUTIONS

In June 2008, the NSW Parliament passed new legislation affecting Section 94 developer contributions. This legislation is still yet to be enacted.

In summary, the new legislation will only allow Councils to collect development contributions for local and district roads, local and district bus facilities, local and district parks, local sporting, recreational and cultural facilities and social facilities, local and district car parking facilities, drainage and stormwater management works, land for any community infrastructure (except land for riparian corridors) and only if there is a direct connection with the development to which a contribution relates. Along with the new legislation, detailed guidelines, clarifying a number of unresolved issues, are yet to be released. These are expected in the first half of 2009.

Additionally, in November 2008, the NSW Treasurer announced a total review of developer levies in his "Mini Budget". The results of this review were announced on 19 December and have significant ramifications for Wyong Council and how it will fund essential infrastructure in the Warnervale-Wadalba release areas and Warnervale Town Centre.

Councils will be limited to charging a maximum of \$20,000 per residential lot or dwelling unless approval is received from the Minister for Planning to charge a higher amount.

Council was required, by a Section 94E Ministerial Direction, to notify the Department of Planning of its intention to seek approval from the Minister to levy contributions above the \$20,000 per lot/dwelling cap. The Minister's Direction was issued on 23 January 2009 and Council was required to submit its notice of intention by 2 February 2009.

On 30 January 2009, Council submitted its notice of intention that it would be making a formal submission seeking to levy contributions above \$20,000 per lot/dwelling under Contributions Plan 7A – Warnervale District and Contributions Plan 3 – The Entrance District. Council's Shire Wide Contributions Plan is also affected as shire wide contributions form part of the contributions above \$20,000 under each of the other two affected plans. A copy of Council's notice of intention to the Department of Planning

can be found at Attachment 3. Council's endorsement of the contents of this notice of intention is sought.

Contributions capped at \$20,000 per lot will have a significant affect on Council's ability to fund essential community infrastructure in the Warnervale-Wadalba release areas and the Warnervale Town Centre, where contributions are currently around \$40,000 per lot. This represents a 50% loss of future income in these areas.

Council's formal submission seeking to levy contributions above \$20,000 per lot/dwelling must be sent to the Department of Planning by 2 March 2009. Given the significant loss of future income which could result from a \$20,000 cap, Council has engaged an independent expert consultant to assist in reviewing Contributions Plan 7A and preparing a detailed formal submission. Assistance from this consultant will greatly improve Council's chance of being able to levy contributions above \$20,000 per lot/dwelling. Council's endorsement of preparation of this important submission is sought.

If Council is unsuccessful in its request, it is likely that the \$20,000 cap will take effect from 30 April 2009. If contributions are capped at \$20,000 per lot/dwelling, Council will have to amend affected contributions plans to reduce the amount and cost of infrastructure proposed to be provided in the Warnervale-Wadalba release areas and the Warnervale Town Centre, or remove the facilities from the contributions plans.

6 DEVELOPER CONTRIBUTIONS CASH FLOW MODEL

This project will have a significant impact on the cashflow model that affects all developer contributions.

Council has the ability to "pool" developer contributions so that priority infrastructure can be constructed earlier than would otherwise be possible. In the past, Council has relied on this "pooling" ability to allow it to construct such facilities as the Wadalba sporting fields in 2007, rather than wait until all contributing areas have been developed and the necessary funds collected.

The cash flow model for developer contributions is now very income sensitive due to the slowdown in property development activity in the Shire.

Key elements of the cash flow model are:

- * As at 30 June 2008, the balance of developer contribution funds held was \$32 million.
- * Projected income has been reduced to account for the global financial crisis and resultant slowdown in the property market.
- * Expenditure for known nominated projects and refunds to developers for works over the next 23 years is approximately \$245 million.

Once the full extent of the changes to developer contributions is known, a detailed review of the cashflow model will be undertaken and presented to Council for endorsement.

7 CANCELLATION OF CONSTRUCTION TENDERS

Tenders for construction of the full length of the Link Road and associated length of trunk water main were called on 9 October 2007, before the Department of Planning issued a planning circular on 6 November 2007, which foreshadowed changes to legislation that would no longer permit developer contributions to be collected for, and

allocated to, the Link Road. Due to the 14 month delay created by the State Government, it is necessary to cancel the contract proposal.

In accordance with the requirements of Clause 178 of the Local Government (General) Regulation 2005, it is recommended to cancel the proposal for the contract and to decline to accept any of the tenders received by a resolution of the Council.

8 CONCLUSION

The Link Road project has had a complex history to date. This report identifies the issues associated with the planning, design, cost, funding and construction of the project.

As the investigation and design process for the project developed, there were significant planning, environmental, geotechnical and engineering challenges, largely associated with crossing the edge of the Porters Creek wetland. As a result of these issues, the scope of the project increased significantly from the initial concept, with resulting significant cost escalation for the project. The investigation and design consultancy with Connell Wagner was substantially increased in complexity and duration to address all of the issues that arose, with resulting significant cost escalation for that contract. It is recommended that Council approve additional funding to increase the contract sum for Contract CPA 94531 with Connell Wagner Pty Ltd from \$527,026.95 (including contingency amount and excl GST) to \$2,286,704.49 (excl GST).

Cash flow implications for Council presented by the project are significant. Staging of the project is proposed to allow construction of the northern 900 metre long section in the short term and defer construction of the southern 2,300 metre long section to approximately 2024. This timeframe aligns with projected income from developer contributions being sufficient at that time, a stronger position to argue that the State Government should contribute to the cost of the Link Road and the predicted need for the full length of the Link Road to be operational, based on the most recent traffic modelling. This staging proposal is predicated on the Federal Government's agreement to maintain the presently secured grant funds under the Auslink program.

Construction tenders called for the Link Road (and associated length of a trunk water pipeline) in late 2007 are also considered. Due to the change in circumstances surrounding the staging of the project; timing of the staging; and the 14 month delay created by the State Government associated with uncertainty to fund the project from developer contribution funds, cancellation of the proposed Contract CPA/127795 is recommended.

ATTACHMENTS

- 1 Link Road Locality Map
- 2 Current Status of the Consultancy Contract CPA94531 with Connell Wagner Pty Ltd with Annexures
- 3 Letter to Department of Planning dated 30 Jan 2009 - Notice of Intention - WSC seeks contributions higher than \$20k

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