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United States General Accounting Office
Washington, DC 20548

September 24, 2002

The Honorable Constance A. Morella
Chairwoman
Subcommittee on the District of Columbia
Committee on Government Reform
House of Representatives

Subject: *District of Columbia: Status of Construction of the Convention Center*

Dear Madam Chairwoman:

You asked us to provide periodic briefings on the status of the construction of the new convention center in Washington, D.C. The convention center is being constructed in accordance with the Washington Convention Center Authority Act of 1994, which authorizes the Washington Convention Center Authority (WCCA) to construct, maintain, and operate a new convention center while continuing to maintain and operate the existing convention center.

As agreed with your office, we reviewed information related to the status of the convention center construction, costs, and financing as of June 2002, the most recent information available at the time of our review.

Specifically, our objectives were to provide information on (1) issues related to the Revised Guaranteed Maximum Price agreement (RGMP)¹ set in January 2002, (2) the status of construction and significant construction issues that could delay completion of the project, (3) whether the January 2002 estimated total project cost² of \$799.5 million has changed, and, if so, the causes and nature of the changes, and (4) whether WCCA's funding appears to be sufficient to cover the current estimated total project cost.

In order to meet these objectives, we reviewed the RGMP, held discussions with and obtained information from WCCA officials and the DC City Council's oversight contractor for the project, reviewed the construction manager's (CM) and WCCA's monthly progress reports and WCCA's financing plan, visited the construction site, and considered the results of our prior work, which were most recently reported to

¹ The RGMP is intended to represent the final construction price negotiated for hard costs between the construction manager and WCCA.

² WCCA established the \$799.5 million total project cost estimate in January 2002.

you in January 2002.³ We conducted our work from April through August 2002 in accordance with generally accepted government auditing standards.

On August 22, 2002, we briefed the staff of your subcommittee on the preliminary results of our review. This letter transmits material from that briefing, which includes data through June 30, 2002, the most recent information available at the time we prepared this report. The briefing slides are included in enclosure I.

Results in Brief

On January 31, 2002, the RGMP was set by the CM and WCCA at \$590.7 million. As part of the RGMP agreement, WCCA is responsible for cost increases resulting from changes in design and scope (and not attributable to improper management by the CM and subcontractor error). As of June 30, 2002, the RGMP has increased by \$7 million to \$597.7 million. These increases were related to changes in design and the resulting scopes of work for specific building trades. WCCA officials told us that the RGMP would continue to increase as a result of such changes and that they are working to quantify the extent.

The project construction schedule, as established by the RGMP, includes the following deadline dates for the project: (1) substantial completion⁴ of convention-ready areas⁵ by March 31, 2003, (2) substantial completion of all remaining areas by June 30, 2003, and (3) final completion⁶ by October 1, 2003. As of July 2002, according to WCCA officials, the convention center construction activities were approximately 80 percent complete. Although the project was 20 days behind schedule as of June 2002, WCCA officials say they are taking steps to meet the current construction schedule. WCCA has identified several significant construction issues that, if not resolved, could delay completion. WCCA is working with the CM and architect/engineering team to address these issues.

A critical milestone that must be achieved in order for WCCA to maintain the construction schedule is completing the facility's exterior shell, which WCCA had initially anticipated occurring in late October or early November 2002. WCCA has now set a time frame for this to occur in December 2002. Missing the December 2002

³ U.S. General Accounting Office, *District of Columbia: Status of the New Convention Center Project*, GAO-02-335T (Washington, D.C.: Jan. 18, 2002).

⁴ Substantial completion means that the area is completed enough to obtain a certificate of occupancy that can be issued on a partial or temporary basis. Building support systems and life safety systems must be working.

⁵ According to the RGMP, convention-ready areas include the south building, central plant area, portions of the north and middle buildings necessary to occupy the lower exhibit hall, and the west concourse necessary to serve the lower exhibit hall.

⁶ Final completion means the completion of all three buildings and minor items identified by WCCA during the final walk-through.

milestone could significantly affect the project schedule, delaying completion of the interior work and adding to the risk of delaying the completion of the convention center. In the event that WCCA does not meet the December 2002 milestone, a mitigation plan has been developed which WCCA officials described as allowing critical interior work to proceed in a dry environment.

According to WCCA, the total estimated project cost remained at \$799.5 million as of June 2002. However, WCCA has identified several factors that will increase the project cost. WCCA has quantified potential cost increases of \$23.8 million. Additional costs are anticipated by WCCA for unspecified mechanical, electrical, and plumbing (MEP) changes and to negotiate and settle CM submitted and unsubmitted change orders of \$38.1 million. As of June 2002, WCCA's total estimated cost of \$799.5 million included \$9.8 million in contingency and owner's adjustment accounts to cover unanticipated cost increases. WCCA is working with the CM to minimize the effects of potential cost increases.

The estimated project funding available as of June 30, 2002, was \$822.5 million, or \$6.8 million more than the \$815.7 million projected as available during January 2002. As of June 30, 2002, \$805.4 million, or 98 percent of the total projected funding has been received. Assuming all projected funding is collected and no cost growth occurs, there would be residual funding of about \$23 million based on the June 30, 2002, cost and funding estimates. Adding this amount and the approximately \$9.8 million of contingency and owner's adjustment account balance now included in the \$799.5 million estimated project cost for unanticipated cost increases, the amount available to absorb cost increases could be \$32.8 million. As of June 2002, known cost increases totaled \$23.8 million and there are also a number of known but unquantified and unnegotiated changes. WCCA officials noted that they continue their efforts to implement cost-reducing measures. WCCA officials told us that they believe the available funding will be sufficient to cover the total estimated project costs, including the estimated cost increases associated with factors discussed in this briefing through the end of the project.

We provided WCCA a copy of the transmittal letter and slides for comment. WCCA agreed that the draft letter and briefing slides accurately reflect the status of the convention center project. WCCA also provided some technical comments and clarifications which we have incorporated as appropriate throughout the briefing slides.

We are sending copies of this report to the Ranking Minority Member of your Subcommittee. We are also sending copies to the Chairmen and Ranking Minority Members of the Subcommittee on the District of Columbia; Senate Committee on Appropriations, Subcommittee on the District of Columbia; House Committee on Appropriations and other interested congressional committees.

This letter will also be available on GAO's home page at <http://www.gao.gov>.

If you have any questions, please contact me at (202) 512-9471 or by e-mail at franzelj@gao.gov. Key contributors to this letter were Keith A. Thompson, Terrell G. Dorn, Arkelga L. Braxton, Maria D. Edelstein, and Donell L. Ries.

Sincerely yours,

A handwritten signature in black ink that reads "Jeanette M. Franzel". The signature is written in a cursive style with a large, looping initial "J".

Jeanette M. Franzel
Director, Financial Management and Assurance

Enclosure



**U.S. General Accounting Office
Financial Management and Assurance Team**

**District of Columbia Government:
Status of the New Convention Center Project**

**Briefing for the Staff of the House Committee on Government Reform,
Subcommittee on the District of Columbia**

August 22, 2002

Introduction/Objectives

- You asked us to provide periodic briefings on the status of the construction, costs, and financing of the new Washington, D.C., convention center.
- Our objectives were to provide information on
 - issues related to the Revised Guaranteed Maximum Price agreement (RGMP), which was set in January 2002;
 - the status of construction and significant construction issues that could delay completion of the project;

Introduction/Objectives

continued

- whether the January 2002 estimated total project cost of \$799.5 million has changed, and if so, the causes and nature of the changes; and
- whether the Washington Convention Center Authority's (WCCA) funding appears to be sufficient to cover current estimated project costs.

Background

- The Washington Convention Center Authority Act of 1994 authorizes WCCA to construct, maintain, and operate the new convention center as well as to maintain and operate the existing convention center.
- WCCA's Managing Director/Development oversees the contract and the construction with the assistance of the program manager, a group made up primarily of three consulting groups and several subcontractors.
- The Construction Manager (CM) is a joint venture responsible for the construction of the new convention center.

Background

continued

- The construction management services agreement between the CM and WCCA includes a Guaranteed Maximum Price (GMP) for hard costs--which include construction costs such as site work, concrete, and metals--but excludes soft-cost items.¹
- The GMP is intended to represent the final construction price negotiated for hard costs between the CM and WCCA. However, adjustments to the GMP may be made to reflect quantities and costs that differ from the baseline assumptions as the project progresses.

¹Soft costs are construction costs that are not related to the physical structure of the facility, such as design fees, legal costs, and consulting and inspections.

Background

continued

- The CM and WCCA executed the RGMP agreement for \$590.7 million on January 31, 2002.
- The DC City Council has hired a contractor to provide periodic status reports on the construction of the convention center.

Results in Brief

- Although the RGMP was set at \$590.7 million in January 2002, WCCA is responsible for cost increases resulting from design and scope changes, except for such increases that are the result of improper management by the CM.
- The RGMP has increased \$7.0 million, from \$590.7 million at January 31, 2002, to \$597.7 million as of June 30, 2002. These increases were related to changes in the design and scope of electrical and roofing work, metals work, and mechanical, electrical, and plumbing (MEP) work.

Results in Brief

continued

- WCCA officials told us that the RGMP will increase as a result of design and scope changes related to steel, MEP, and fireproofing trades.
- A critical milestone in maintaining the construction schedule is completing the facility's exterior shell, which WCCA had initially anticipated occurring in late October or early November 2002. However, WCCA has now set a time frame for this to occur in December 2002. Missing the December 2002 milestone could affect the timeliness of completion of the convention center.

Results in Brief

continued

- According to WCCA officials, the convention center construction activities were approximately 80 percent complete as of July 2002, and WCCA is taking steps to meet the current construction schedule.
- WCCA is working with the CM and the Architect/Engineer (A/E) team to address significant issues that could delay completion of the project.

Results in Brief

continued

- Total estimated project cost remained at \$799.5 million, according to WCCA, including available contingency balances of \$9.8 million, as of June 2002 (contingency balance outside of the RGMP of \$7.2 million and owner's adjustment account in the RGMP of \$2.6 million).
- WCCA has identified several factors that could result in a projected cost increase of \$23.8 million. In addition, WCCA has identified other potential increases that are not yet quantified.
- WCCA is working with the CM to minimize the effects of factors that could lead to cost increases.

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Results in Brief

continued

- WCCA has established allowances/reserves to cover costs that are anticipated but not completely quantified and a contingency amount to cover unanticipated cost increases.
- Available project funding increased from \$815.7 million in January 2002 to \$822.5 million in June 2002, according to WCCA.

Results in Brief

continued

- The estimated funding sources of \$822.5 million, less total estimated project costs of \$799.5 million, resulted in an estimated residual funding, as of June 30, 2002, of \$23 million. However, WCCA has stated that the total estimated cost will increase.
- The estimated residual funding added to the contingency and owner's adjustment account totals \$32.8 million. When compared to the quantified potential cost increases, the potential excess available funding is \$9.0 million as of June 30, 2002. However, all of these figures are subject to uncertainty.
- WCCA officials told us that they believe the available funding amount will be sufficient to cover the total estimated project costs, including identified potential cost increases through the end of the project.

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Results in Brief

continued

- We requested comments on a draft of these briefing slides from WCCA's Chief Financial Officer and Managing Director/Development, who agreed that the draft letter and briefing slides accurately reflect the status of the convention center project. They also provided technical comments and clarification which we have incorporated as appropriate throughout the briefing slides.

Revised Guaranteed Maximum Price

- On January 31, 2002, the RGMP was set by the CM and WCCA at \$590.7 million. However, WCCA is responsible for cost increases resulting from changes in design and scope (and not attributable to improper management by the CM and subcontractor error). Any such increase will have to be absorbed by WCCA's available funding.
- The RGMP has increased \$7.0 million from \$590.7 million at January 31, 2002, to \$597.7 million as of June 30, 2002. These increases were related to changes in design and scope for electrical and roofing work, metals work, and MEP work. WCCA must absorb these cost increases.

Revised Guaranteed Maximum Price

continued

- WCCA officials told us that the RGMP will increase as a result of cost increases resulting from changes in design and scope related to steel, MEP, and fireproofing trades. WCCA estimated a \$3.2 million increase related to steel but was unable to determine the amount of the other potential increases at the time of our review.
- The RGMP consists of seven cost components. Table 1 shows the components and the corresponding amounts as of June 30, 2002.

Revised Guaranteed Maximum Price

continued

Table 1: Components of the RGMP and Costs as of June 30, 2002
(Dollars in millions)

Amount	Description
\$496.8	Work that was included in the scope of the original GMP amendment. This amount includes allowances and reserves for remaining purchases, unit rate allowances, and submitted and unsubmitted change orders that WCCA tracks separately.
15.9	Work related to hazardous material removal cost.
36.2	Out-of-scope estimate for Metro station, telecommunications, food service, audiovisual, and certain utility work.
33.0	Estimate for the cost of general conditions and general requirements. ^a
12.9	Construction fee to be paid to the CM. ^b
.3	Utility relocation fee.
2.6	Owner's adjustment account to be used at WCCA's discretion.
\$597.7	Total cost of RGMP components

^aThe estimate for the cost of general conditions and general requirements consists of CM field overhead items such as onsite trailers, onsite staff, blueprinting, fringe benefits, and consultants.

^bThe construction fee is the CM's profit and home office overhead for managing the project. It consists of the amount in the original GMP of \$9.5 million and increases due to change orders and out-of-scope work.

Status of Construction

- A critical milestone that must be achieved in order for WCCA to maintain the construction schedule is completing the facility's exterior shell, which WCCA had initially anticipated occurring in late October or early November 2002. However, WCCA has now set a time frame for this to occur in December 2002.
- Missing the December 2002 milestone could significantly affect the project schedule, delaying completion of the interior work and adding to the risk of delay in timely completion of the convention center.
- In the event that WCCA does not meet the December 2002 milestone, mitigating plans include installation of temporary weather walls and weather protection that would allow critical interior work to proceed in a dry environment.

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Status of Construction

continued

The following deadlines were reset in the RGMP:

- substantial completion² of convention-ready areas³ by March 31, 2003;
- substantial completion of all remaining areas by June 30, 2003; and
- final completion⁴ by October 1, 2003.

²Substantial completion means that the area is completed enough to obtain a certificate of occupancy that can be issued on a partial or temporary basis. Building support systems and life safety systems must be working.

³According to the RGMP, convention-ready areas include the south building, central plant area, portions of the north and middle buildings necessary to occupy the lower exhibit hall, and the west concourse necessary to serve the lower exhibit hall.

⁴Final completion means the completion of all three buildings and minor items identified by WCCA during the final walk-through.

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Status of Construction

continued

- According to WCCA officials, the convention center construction activities were approximately 80 percent complete as of July 31, 2002, and WCCA is taking steps to meet the current construction schedule.
- WCCA has identified several significant construction issues that, if not resolved, could delay completion of the project. WCCA is working with the CM and A/E team to address these issues, including
 - increasing the number of workers, overtime, or both in order to expedite the exterior enclosure work and the interior trades work to meet the deadline dates,
 - providing a sufficient period of time to move into the facility and establish operations of the major systems, and

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Status of Construction

continued

- expediting the landscape/hardscape⁵ work, which is currently several months behind schedule.
- In the event that the CM does not meet the June 30, 2003, substantial completion date, the CM would be required to pay \$50,000 per day for each calendar day of delay. However, unless the delay is the result of the CM's gross negligence in conducting its management responsibility or the CM's deliberate failure to comply with a material directive from WCCA, WCCA must accept from the CM an assignment of CM claims against subcontractors as payment of liquidated damages.

⁵This work involves replacing all the curbs, sidewalks, and roadways around the new convention center, as well as installing new lighting and planting trees.

Status of Costs

Estimated Costs

- According to WCCA, the total estimated project cost remained at \$799.5 million as of June 2002 (see table 2).

Status of Costs

Estimated Costs continued

Table 2: Comparison of WCCA’s Unaudited Estimated Costs for the New Convention Center as of September 1998, January 2002, and June 2002

(Dollars in thousands)

Project component	Estimate as of 9/1998	Estimate as of 1/2002	Estimate as of 6/2002	Percentage change from 9/1998 to 6/2002
WCCA-estimated hard costs ^a	\$505,600	\$590,678	\$597,669	
WCCA-estimated soft costs ^b	118,903	145,524	143,462	
Contingency ^c	30,497	9,966	7,159	
Estimated cost of outsourced work ^d	59,000	53,380	51,258	
Total estimated construction costs	\$714,000	\$799,548	\$799,548	12.0

^aHard costs are construction costs related to the physical structure of the facility, such as masonry, concrete, hazardous material removal, and structural steel. This line item also includes an owner’s adjustment account of \$2.6 million as of June 30, 2002, which is a contingency within the RGMP.

^bSoft costs are construction costs that are not related to the physical structure of the facility, such as design fees, legal costs, and consulting and inspections. This line item also includes \$10.8 million of other costs, which include administrative costs related to marketing, public affairs, and salaries of staff dedicated to the project.

^cThe contingency is an estimate in the project’s budget that is earmarked for cost increases.

^dEstimated cost of such outsourced work as work on the Metro station, utility relocation, central plant, telecommunications, and food service, for which WCCA has identified specific funding sources as a part of the total available financing.

Source: WCCA records

Status of Costs

Estimated Costs continued

- WCCA had incurred \$576.6 million or 72 percent of the \$799.5 million total estimated project cost as of June 30, 2002.
- Although construction costs were within the total project cost estimate at the time of our review, WCCA has identified factors that will increase costs.

Status of Costs

Estimated Costs continued

- WCCA has quantified potential cost increases of \$23.8 million (as shown in table 3) related to such factors as
 - accelerated construction activities,
 - MEP coordination issues,⁶
 - second shift and overtime work,
 - projected cost overrun for the Metro station,
 - back-up steel associated with the exterior enclosure, and
 - Department of Public Works (DPW) hardscape subcontract.

⁶These costs are the result of design changes necessary to resolve conflicts between MEP design drawings and the structural and architectural design drawings.

Status of Costs

Estimated Costs continued

- WCCA officials stated that the quantified potential cost increases may not impact the total estimated project cost. WCCA is still assessing the exposures and their potential cost impact.
- For other factors that it is working to address, WCCA had not, at the time of our review, specified a cost estimate or had not finalized its estimate. These factors include
 - implementing MEP design changes and
 - the CM's submitted and unsubmitted change orders outstanding, which totaled \$38.1 million as of June 2002.

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Status of Costs

Estimated Costs continued

Table 3: Summary of Potential Cost Increases as of June 2002

(Dollars in thousands)

Potential cost increases	Estimated amounts
Accelerated construction activities and MEP coordination costs ^a	\$ 13,200
Second shift and overtime	2,600
Projected cost overrun for Metro station	1,800
Back-up steel associated with exterior enclosure	3,200
DPW subcontract	3,000
Subtotal	\$ 23,800
MEP design changes	Unknown
Resolution of change orders	Unknown

^aThis line item refers to costs associated with expediting work, completing the exterior enclosure, and resolving MEP coordination issues.

Source: WCCA records

Status of Costs

Estimated Costs continued

- WCCA is working with the CM and WMATA to minimize the effects of factors that could lead to cost increases.
 - According to WCCA officials, negotiations are ongoing with the CM to resolve the \$38.1 million in submitted and unsubmitted change orders generated since the RGMP was put in place.
 - To address projected cost overruns for expansion of the Metro station, WCCA and WMATA meet weekly to discuss ways to reduce costs.

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Status of Costs

continued

Allowances/Reserves and Contingency Balances

- WCCA has established allowances/reserves and a contingency amount as means for absorbing various costs that may occur throughout the project.
- An allowance, according to WCCA officials, is an amount set aside within a purchased subcontract for known work that did not have a detailed scope of work when the subcontract was awarded.
- Reserves, according to WCCA officials, are amounts set aside for a known scope of work, within the RGMP, that has not yet been contracted.

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Status of Costs

Allowances/Reserves and Contingency Balances continued

- The contingency is an estimated amount earmarked for unanticipated cost increases.
- Tracking the balances in the allowances/reserves and contingency that have been established outside and inside of the RGMP is key to monitoring WCCA's progress in completing construction on time with minimal cost overruns.
- See summary of allowances/reserves and contingency balances in table 4.

Status of Costs

Allowances/Reserves and Contingency Balances continued

Table 4: Summary of Unaudited Allowances/Reserves and Contingency Balances

(Dollars in thousands)

Description	January 31, 2002 (RGMP effective date)			June 30, 2002			Change
	Inside RGMP	Outside RGMP	Total	Inside RGMP	Outside RGMP	Total	
Allowances/Reserves							
Allowances/reserves	\$ 14,700	\$ 4,364	\$ 19,064	\$ 10,237	\$ 3,067	\$ 13,304	\$ (5,760)
Pending trade change reserves	20,250		20,250	19,428		19,428	(822)
Total	\$ 34,950	\$ 4,364	\$ 39,314	\$ 29,665	\$ 3,067	\$ 32,732	\$ (6,582)
Contingencies							
Owner's adjustment account	\$ 9,800		\$ 9,800	\$ 2,600		\$ 2,600	\$ (7,200)
Contingency		9,966	9,966		7,159	7,159	(2,807)
Total	\$ 9,800	\$ 9,966	\$ 19,766	\$ 2,600	\$ 7,159	\$ 9,759	\$ (10,007)

Source: WCCA

Funding

- Estimated available funding increased from \$815.7 million at January 2002 to \$822.5 million at June 2002, according to WCCA. This is attributed to a
 - \$1.4 million increase in the estimate of interest earned on the \$25 million congressional contribution being held by WMATA for Metro construction,
 - \$5 million increase in the contribution to be received from the vendor selected to provide food service, and
 - \$.4 million increase in the estimate of federal highway funds.

Funding

continued

- WCCA had received \$805.4 million (98 percent of the estimated total \$822.5 million) of available funding as of July 31, 2002.
- According to WCCA officials, the remaining \$17.1 million is expected from the following financing sources:
 - \$9.4 million in federal highway funds.
 - \$5 million in vendor reimbursements⁷ yet to be negotiated. Until these vendor reimbursements are negotiated and received, WCCA is at risk for these costs.
 - \$2.7 million from interest earned on the \$25 million congressional contribution being held by WMATA.

⁷WCCA anticipates reimbursements for equipment costs related to telecommunications and audiovisual.

Funding

continued

- The estimated funding of \$822.5 million exceeds total estimated project costs of \$799.5 million, as of June 30, 2002, by \$23 million. However, WCCA has stated that the total estimated cost will increase.
- The estimated residual funding combined with the owner's adjustment account and the contingency could be used to cover future increases in total project costs not now covered by existing allowances/reserves in the cost estimates. (See table 5.)
- WCCA officials told us that they believe the available funding will be sufficient to cover the total estimated construction costs, including the estimated cost increases associated with factors discussed in this briefing, through the end of the project.

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Funding

Estimated Residual Funding continued

Table 5: Analysis of Remaining Funding Available and Quantified Potential Cost Increases

(Dollars in thousands)

Description	Estimated amounts
Estimated project residual funding ^a	\$ 23,000
Contingency	7,159
Owner's adjustment account	2,600
Subtotal	32,759
Less: Quantified potential cost increases ^b	23,800
Potential excess of available funding over quantified potential cost increases as of June 2002	\$ 8,959

Note: All of the figures above are subject to uncertainty.

^aThis figure was calculated using the estimated cost figure of \$799.5 million, which WCCA has stated will increase.

^bQuantified potential cost increases are estimates that are subject to change. In addition, potential increases for MEP design changes and resolution of change orders have not been quantified.

Scope and Methodology

- In order to determine what was updated as a result of the RGMP agreement, we reviewed the RGMP to determine the final settlement of pending change orders submitted by the CM, the new RGMP estimate, and new construction deadline dates. We also held discussions with WCCA officials to discuss issues related to the RGMP.
- In order to determine the status of construction and identify related issues, we
 - held discussions with WCCA officials and the DC City Council's oversight contractor regarding the status of the project as of June 2002 and observed weekly construction status meetings between the CM and WCCA, and

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Scope and Methodology

continued

- reviewed the CM's and WCCA's monthly progress reports and visited the construction site.
- In order to evaluate estimated cost information, we
 - reviewed estimated project costs included in WCCA's monthly status reports through June 2002 to identify any cost increases since January 31, 2002, and held discussions with WCCA officials to discuss factors that could affect costs; and

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Scope and Methodology

continued

- held discussions with the DC City Council's oversight contractor to monitor progress and identify major issues associated with the RGMP and the total estimated project cost.
- In order to determine if estimated funding appears sufficient, we reviewed WCCA's financing plan to analyze whether the current estimated funding covers the remaining estimated project cost and any identified project cost increases.

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Scope and Methodology

continued

- We conducted our work from April through August 2002 in accordance with generally accepted government auditing standards and considered the results of our most recent work, which were reported to you in January 2002.⁸

⁸ U.S. General Accounting Office, *District of Columbia: Status of the New Convention Center Project*, GAO-02-335T (Washington, D.C.: Jan. 18, 2002).

Agency Comments

- WCCA agreed that the draft letter and briefing slides accurately reflect the status of the convention center project. WCCA provided some technical comments and clarification which we have incorporated as appropriate throughout the briefing slides.