

AFFIDAVIT OF MICHAEL J. MCNAMARA
Chief Operations Officer
School District of Pittsburgh

I, Michael J. McNamara, Chief Operations Officer, the School District of Pittsburgh, on this day of March 25, 2026, hereby solemnly swear and affirm, under penalty of perjury of law, that the following is true and accurate to the best of my information and belief:

1. As the District's Chief Operations Officer, I attest that the District routinely does everything in its power to ensure the safety of its students in their commutes to school via bus or walk zone, on a daily basis.
2. The District continued the safety work it already implements on a daily basis, in the preparation materials for the Future Ready Facilities Plan.
3. I further wish to confirm that walk zones would not be expanding under the Future Ready Facilities Plan. Rather, the number of students utilizing the walk zones will inevitably expand, but the walk zones themselves will not be modified. Accordingly, "updated maps" relating to new walk-zone alignment do not exist, nor do projected timelines, schedules, or safety-audit documents addressing the roll-out of new walk zones, because the walk zones themselves would not be modified under the since-denied Future Ready Facilities Plan.
4. Because there has been no approval of the Future Ready Facilities Plan or proposed school closure plan at this time, our Departments have not initiated fulsome safety analyses and protocols, given the status of the plan.
5. Prior to the School Board's denial of the Future Ready Plan in November 2025, the District offered projections and goals for safety. The District, through its Transportation Department, would not have been authorized, however, to effectuate implementation of such safety measures for the Future Ready Plan, which had not been approved.
6. At present, the District continues to maintain its safety procedures currently in place for students as it relates to transportation.
7. To this end, the District regularly coordinates with the Pennsylvania Department of Transportation (PennDOT) regarding safe walking routes for students.
8. For example, the District works with parents to identify potentially unsafe walking routes, through the Hazardous Route Claim Form. The District then utilizes PennDOT's

Hazardous Walking Route Form to analyze the route and thereafter sends it to PennDOT for review.

9. Records demonstrating the District's efforts to coordinate with the City of Pittsburgh regarding crossing guards and the utilization of the City's Safe Routes to School Initiatives specific to the Future Ready Facilities Plan, do not exist at this time, because the FRFP was not approved by the Board.
10. If the FRFP were approved, the District, through its Transportation Department, would certainly work with the City of Pittsburgh concerning safety, ensuring safe walking routes, and coordinating crossing guards specific to the FRFP.
11. The District routinely engages with the City of Pittsburgh and its Safe Routes to School Initiatives for the safety of its students on an ongoing basis, however, does not do so in a specified manner regarding the FRFP at this time, given the Board's denial.
12. Unless and until FRFP approval, the District continues to coordinate with the City of Pittsburgh regarding transportation safety measures for its students on a general basis.
13. To this end, the District has provided records relating to ongoing correspondence the District maintains with the City of Pittsburgh regarding crossing guard coordination.



Michael J. McNamara
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