

RED HILL VALLEY PARKWAY INQUIRY

AFFIDAVIT OF CHRIS MCCAFFERTY (sworn November 2, 2022)

I, **CHRIS MCCAFFERTY**, of the City of Hamilton , in the Province of Ontario,

MAKE OATH AND SAY:

1. I have been the Manager of Design in the Light Rail Transit (“LRT”) Office of the City of Hamilton (the “City”) since April 2022. I was a Project Manager in the City’s Design section from 2002 to 2007. I was a Senior Project Manager, Design, from 2007 to 2016. My roles as Project Manager and Senior Project Manager were both in the Design section of the Engineering Services Division within the City’s Public Works Department. I have knowledge of the matters set out below, except where this knowledge is based on information and belief, in which case I state the source of that information and verily believe it to be true.

2. From February 2016 to April 2020, I was the Senior Project Manager for LRT Engineering and Design. My role with the City was solely devoted to the LRT project during that period. I returned to my prior role as Senior Project Manager, Design, from April 2020 until April 2022. I returned to the LRT Office in April 2022.

3. In the 1990s, I was a technologist with the City in the Transportation Planning group, and I assisted the Special Projects Office in putting together presentation materials for public meetings on the Red Hill Valley Parkway (“RHVP”) project. Aside from this work

in the 1990s, I did not work on any projects related to the RHVP during my tenure in Engineering Services or with the City generally.

4. I do not know why I was copied on Richard Andoga's April 15, 2016 email advising that Asset Management had programmed the RHVP for rehabilitation in 2017 (HAM0000760_0001). I was working exclusively on the LRT as of April 15, 2016. Following this email, I was not involved in any subsequent discussions about the rehabilitation of the RHVP and/or improving skid resistance on the RHVP. The RHVP repaving project was completed while I was working exclusively on the LRT.

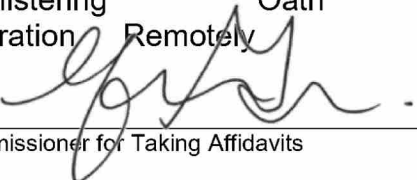
5. I worked with Jason Worrone, Senior Project Manager, Traffic Engineering, on some capital projects for the City. Mr. Worrone's group assisted with traffic calming for these projects.

6. Mr. Worrone never asked me for friction testing results for the RHVP. I did not deny Mr. Worrone access to the Tradewind Report or friction testing results for the RHVP at any time (GOL0001113). I was not aware of any requests for RHVP friction testing results from anyone in Traffic Operations and Engineering, or any other Public Works division, at any time prior to the public disclosure of the Tradewind Report in February 2019.

7. I was not aware of any friction testing, or report on friction testing, for the RHVP during Mr. Worrone's term of employment with the City (2015 to 2017). I learned about the Tradewind Report in February 2019 when it was released to the public. I did not receive a copy of the Tradewind Report prior to February 2019. I was not involved in any conversations about friction testing on the RHVP prior to the public release of the Tradewind Report in February 2019.

8. I make this affidavit for use in the Red Hill Valley Parkway Inquiry.

Affirmed remotely by Chris McCafferty the
City of Hamilton before me in the City of
Toronto in the Province of Ontario, this
2nd day of November, 2022, in
accordance with O. Reg. 431/20,
Administering Oath or
Declaration Remotely


A Commissioner for Taking Affidavits


Chris McCafferty