



U. S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

FHEO Region V
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard – Room 2101
Chicago, Illinois 60604-3507

Office of Fair Housing and Equal Opportunity

August 3, 2015

VIA REGULAR AND ELECTRONIC MAIL

Ron Clewer, CEO
Rockford Housing Authority
223 S. Winnebago Street
Rockford, Illinois 61102
rclewer@rockfordha.org

SUBJECT: Civil Rights Concerns Regarding the New Towne Drive Development

Dear Mr. Clewer:

Our office recently became aware of the decision made by Gorman and Company and RHA to withdraw their application for a PUD in support of their plan to redevelop 65 units of affordable housing from Fairgrounds Valley to a new site on South New Towne Drive.

We are aware of the difficulties in moving forward with such a redevelopment; however, we are concerned about the possible civil rights implications of this decision. Specifically, RHA has an obligation to comply with Title VI of the Civil Rights Act of 1964, and its implementing regulations, which prohibits recipients of federal financial assistance from discriminating on the basis of race in the course of carrying out its programs and activities. Additionally, RHA has an obligation under the federal Fair Housing Act and its implementing regulations to affirmatively further fair housing.

Our concern is based on the fact that the decision to withdraw this proposal may have an adverse impact against African-American public housing residents who are currently living in Fairgrounds Valley, and who would have been eligible to relocate to units developed on New Towne Drive. This proposal, which had already been guaranteed funding in the form of LIHTC from IHDA, would have resulted in the development of affordable housing for RHA residents in a non-racially segregated area of poverty.

Moreover, we are aware that the proposal was withdrawn primarily in response to the anticipated rejection of the RHA's PUD application by the Rockford City Council. As such, this raises further concerns as to the City's compliance with the Fair Housing Act, Title VI and its obligation to affirmatively further fair housing.

We believe that RHA has an obligation to move forward with some level of redevelopment of Fairgrounds Valley in conformity with all applicable civil rights requirements. In addition, the City has the obligation to support the RHA's efforts in this regard. At the same time, we are encouraged by RHA's and the City's apparent enthusiasm to move forward with some variation of the original redevelopment proposal.

If you have any questions or concerns, please don't hesitate to contact me at (312) 913-8400 or by email at Maurice.J.McGough@Hud.gov.

Sincerely,



Maurice J. McGough
FHEO Region V Director
Office of Fair Housing and
Equal Opportunity

cc: The Honorable Larry Morrissey
Mayor of Rockford, Illinois

Antonio Riley
Regional Administrator, HUD Region V

James Cunningham,
Deputy Regional Administrator, HUD Region V

William E. Wilkins
Director, Chicago Office of Public Housing

Janet Elson
Deputy Regional Counsel, HUD Region V