

**From:** Kaylon Hammond [mailto:[khammond@leadershipcounsel.org](mailto:khammond@leadershipcounsel.org)]  
**Sent:** Friday, January 18, 2019 11:03 AM  
**To:** Wilson, Leah  
**Cc:** Veronica Garibay; Phoebe Seaton  
**Subject:** Re: reminder

Hi Leah,

Thank you for the opportunity to provide comments. Please see our recommendations below, requesting clarification on the definitions of indigent and legal services.

Clarify that relevant community/neighborhood/area level economic data can satisfy income eligibility for programs and services that provide community-wide representation and services, in line with the relevant income level threshold. Some examples of these services include negotiating contracts to secure safe drinking water for low-income communities, representing low-income neighborhoods in disadvantaged communities in CEQA lawsuits to protect against increased exposure to diesel emissions and unfair eminent domain practices; representing communities in the California Public Utilities Commission context to secure rate assistance and weatherization assistance; and negotiating housing element programs to ensure investments for extremely low-income housing production and preservation. Sources of income data may include census data; however, especially in rural areas, census data can be very inaccurate and unreliable. For example, the census data in some small communities has a margin of error of between 50% and 100% for economic data. Therefore, we further suggest clarification that diverse data can be used to demonstrate income status including surveys conducted by third party service providers as well as free or reduced school lunch data.

Clarify that services that have been considered legal services including community education and policy advocacy remain as such. These services are critical to improving conditions in low-income households, securing access to services and programs, and reducing vulnerability of lower-income households and neighborhoods.

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