



July 24, 2026

Clinton Jones
General Counsel
Federal Housing Finance Agency
400 Seventh St. SW
Washington, DC 20219

Via Electronic Submission

RE: Enterprise Duty to Serve Underserved Markets (RIN 2590-AB64)

Dear Mr. Jones:

Farmworker Justice (FJ) submits the following comment in response to the Federal Housing Finance Agency's (FHFA) proposed rule on Enterprise Duty to Serve Underserved Markets. FJ is a national organization that aims to empower farmworkers and their families to improve their living and working conditions. We oppose FHFA's proposal to remove high-needs rural populations from its Duty to Serve regulation.

By removing the designation of agricultural workers from the Duty to Serve framework, the housing challenges they face will become statistically and programmatically invisible. There is already a lack of data on agricultural workers and housing. This proposal will further exacerbate these data gaps and reduce incentives to develop housing products and financing strategies tailored to the agricultural worker population.

Farmworkers have unique challenges in accessing safe, affordable housing that need to be addressed through interventions tailored to their specific needs. Due to the seasonal nature of agricultural work, farmworker incomes fluctuate throughout the year. According to the Department of Labor's National Agricultural Workers Survey (NAWS), surveyed crop workers spent an average of 37 weeks during the previous year employed in farm work, with 69% reporting at least one period in the prior 12 months

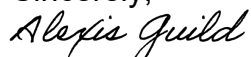
during which they did not work.¹ Further, workers are often paid on a piece rate, meaning that the amount they earn is based on their productivity. This variability makes it difficult to project household income. Workers may also not have pay stubs or other documents to prove their income. In addition, their low wages and unstable employment means that farmworkers tend to live in poor housing conditions with high rates of overcrowding.² Workers who live in multi-family or rental housing tend to have informal arrangements. They do not have lease agreements nor receipts of their payments. Without these documents, it is hard to apply and qualify for a mortgage or other financial assistance. These challenges intersect with other challenges faced by farmworkers, including immigration status, language access, and lack of transportation, among others, creating housing barriers that are unique from the general rural population.

With more farmworkers living in private market housing, the Enterprises need better tools to support rental housing, manufactured housing, small multi-family, preservation, and affordable homeownership opportunities in the communities where farmworkers actually live. Retaining the designation of agricultural workers as a high-need rural population ensures more accurate assessments of housing needs, the development of targeted financing and housing solutions, and better data collection and monitoring.

Farmworkers and their families are essential to our U.S. food system. Access to safe and affordable housing ensures food system resilience. Housing stability affects health, education, employment, family stability, mobility, and long-term economic opportunity. When farmworkers lack stable housing, farmers and growers also face greater workforce instability, making it more difficult to recruit and retain experienced employees, sustain productivity, and maintain a reliable domestic food supply. While many farmworkers may qualify as rural low-income residents, the nature of their employment and the unique barriers they face in obtaining safe, stable, and affordable housing warrant continued recognition as a separate population.

We urge FHFA to retain agricultural workers as a designated high-needs rural population under Duty to Serve. We appreciate your consideration of these comments.

Sincerely,



Alexis Guild

Vice President, Strategy and Programs
Farmworker Justice

¹ U.S. Department of Labor, *Findings from the National Agricultural Workers Survey 2021-2022*, available at <https://www.dol.gov/sites/dolgov/files/ETA/news/pdfs/NAWS%20Research%20Report%202017.pdf>

² California Department of Housing and Community Development, *Farmworkers*, available at <https://www.hcd.ca.gov/housing-element/building-blocks/farmworkers>