



Food in Communities

Mapping Food Policy Priorities in the City and County of Denver

A Report for Our Community Partners

July 2024



DENVER
PUBLIC HEALTH &
ENVIRONMENT



**FOOD IN
COMMUNITIES**

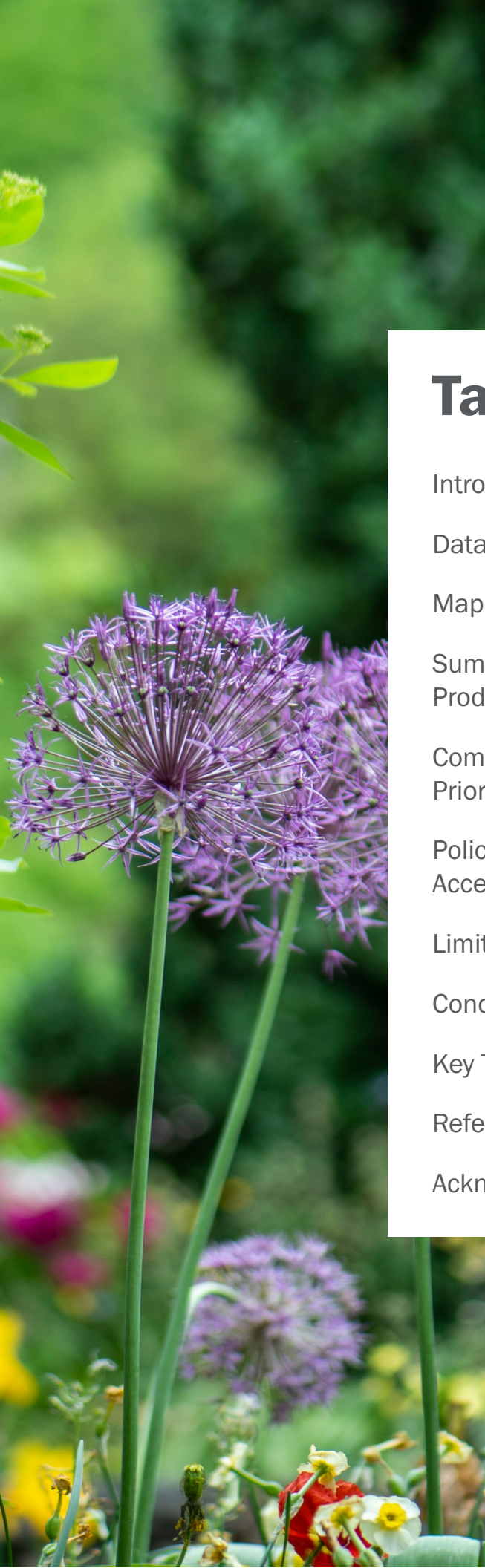


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A close-up photograph of a person's hand holding a vibrant red-stemmed leafy green vegetable, possibly Swiss chard, in a garden. The leaves are large, green, and have prominent veins. The background is dark and out of focus, emphasizing the plant and the hand. A dark blue rectangular box is overlaid on the right side of the image, containing the title text.

Introduction and Purpose

Roughly one in three Denver residents struggles to consistently access enough nourishing and affordable food, leading to negative health outcomes including obesity, heart disease, high blood pressure, and Type 2 diabetes.

Recognizing that promoting healthy communities requires both environmental transformations and individual behavior change, the City and County of Denver and its partners worked together to create the [Denver Food Vision](#),⁴ a comprehensive, collaborative, and aspirational vision for Denver's food system in the year 2030. The Denver Food Vision is a policy tool based on thorough research and community engagement that aims to ensure Denver's food system is healthy, inclusive, vibrant, and resilient. The goals of the Denver Food Vision will be accomplished through the implementation of 61 strategies by the Denver Department of Public Health & Environment (DDPHE) in collaboration with other city agencies and community-based organizations.

The Food in Communities (FIC) program initiative is designed to fulfill the *inclusive* focus area outlined in the Denver Food Vision. FIC's main goal is to increase equitable access to healthy, culturally significant foods by implementing community-driven and evidence-based policy, systems, and environment change. Over the past five years, through collaborative efforts with community partners and intentional community engagement, FIC has documented several key challenges to accessing food in Denver. These include the limited availability of fresh, culturally relevant foods, transportation and storage issues, and restricted access to land for urban food production. Other challenges include time constraints for shopping and food preparation, high rent costs, limited commercial kitchen space for food businesses, and a lack of coordination across the City and County of Denver agencies collaborating on the Denver Food Vision.

Considering these challenges, FIC's objectives for fiscal year 2024 were created to comprehensively assess the current food policy landscape in terms of land use for production, retail, distribution, procurement, and food access in Denver. The program's objectives were:

- Complete one land use policy assessment for food retail and food production and identify two policy priorities to increase access to healthy foods.
- Complete one existing conditions analysis using Geographic Information System (GIS) mapping to identify current food access points.
- Host a minimum of two community listening sessions to identify at least two policy priorities based on land use policy assessment and GIS findings.

FIC completed a land use policy analysis and GIS data mapping to understand food access challenges in Denver. The strategy integrated insights from policy evaluations with GIS maps to evaluate existing food policies and identify gaps and opportunities.

The land use policy assessment helped FIC understand how policies contribute to food security through community-driven, equitable, and sustainable approaches. The activities of the assessment include analyzing Denver's existing policies, determining the current state of implementation, and identifying opportunities and recommendations for policy improvement or development.

The Land Use Policy Assessment process was developed to answer the following research questions:

- What policies exist related to food production, retail, distribution and procurement and access?
- How do the existing policies align with or contradict the goals and needs of FIC's community-based partners?
- How do the existing policies impede or support these activities being carried out in equitable or sustainable ways?
- How are these policies being implemented or not, and why?

GIS was utilized to visually map food access points in Denver. The maps helped answer the following questions:

- What neighborhoods in Denver have limited access to small and large supermarket stores?
- What neighborhoods in Denver have limited access to no-cost assistance sites (such as food pantries)?
- Are the current locations of these food production, no-cost food assistance, and food retail points limited by zoning regulations?
- How are current food access points spatially distributed across Denver, and how does this distribution correlate to socio-demographic factors?
- How can GIS data be leveraged to advocate for food equitable food policies that support under-served communities?

Additionally, FIC conducted three community listening sessions where community members were asked to prioritize food policies based on community needs. The initial objective of the listening sessions was to prioritize two policies from the list provided in Figure 13. FIC decided the community should rank the top three policies instead of two, providing a buffer for potential challenges or opportunities in implementing those policies in the coming year. Those recommendations for food policy changes in Denver will guide neighborhood scale food policies, technical assistance, and resource allocation for FIC's next two years.

Data Sources and Process

Understanding City Land Use Policy

To understand the landscape of policies for local food production, retail, distribution, procurement and access, FIC conducted an extensive review of 16 data sources and held interviews with several city agency representatives responsible for policy adoption and implementation. When choosing the data sources for this assessment, the FIC team focused on three types of land use policy in Denver: *planning policies*, *regulatory policies*, and *financial policies*, which are referred to as data sources in this assessment.

The following pages define each policy type, followed by the data sources that were reviewed.



PLANNING POLICIES

Planning policies are official policy documents adopted by the City and County of Denver, including planning policies such as the Comprehensive Plan 2040 or the local small area plans. Planning policy encompasses all land use within a jurisdiction and provides guidance for long-term development by establishing permitted land uses in different areas within the community and directing future public/private projects. They consolidate information from numerous localized departmental plans into a cohesive overview of what the city will do. Planning policies reviewed include the following:

- Comprehensive Plan 2040¹
- Blueprint Denver²
- Game Plan for a Healthy City³
- 2030 Denver Food Vision⁴
- Green Infrastructure Implementation Strategy⁵
- Denver Moves Everyone 2050⁶
- Denver Economic Development and Opportunity 2021-2022 Strategic Plan⁷
- Community Planning and Development Neighborhood Planning Initiative (NPI)⁸⁻¹²
 - East Area Plan
 - East Central Area Plan
 - Far Northeast Area Plan
 - Near Southeast Area Plan
 - West Area Plan
- Denver One Water Plan¹³

REGULATORY POLICIES

Regulatory policies represent Denver development codes and zoning regulations, which govern how things are built and different types of land use within the city and county. In regulatory policy, zoning plays an important role in overseeing development, land usage, and allowable activities on individual land. Zoning regulations divide Denver into different areas with specific land use guidelines, aligning with the policies outlined in planning policies. Regulatory policies reviewed included the *Zoning and Development Code*¹⁵ and the *Denver Revised Municipal Code*.¹⁴

FINANCIAL POLICIES

Financial policies encompass a strategic range of budget allocations, funding mechanisms, and incentive structures designed to implement desired land use or policy outcomes. These policies ideally support sustainable implementation of planning policies by providing adequate resources for infrastructure development, community amenities, staffing support, and the enforcement of zoning regulations. The financial policy reviewed was *Mayor Mike Johnston's 2024 Budget for the City and County of Denver*.¹⁶

A sign of successful policy implementation is the seamless integration across multiple types of policy starting with the Comprehensive Plan 2040 and/or the Blueprint Denver plan because they guide the strategic vision for the city. Localized plans provide more community-specific guidance, followed by regulation through zoning, and finally, financial support for implementation. To evaluate the status of each policy, a four-point scoring system was created. A policy must have all four components below to achieve a score of four:

Included in Comprehensive Plan 2040 and/or Blueprint Denver

The policy is acknowledged in the Comprehensive Plan 2040 and/or the Blueprint Denver, signifying its importance, but lacks specific implementation measures.

Included in a Localized Department/Agency City Plan

The policy is referenced in a citywide plan (e.g., Neighborhood Plan Initiatives, Denver Food Vision), indicating more concrete consideration, but without regulatory enforcement.

Regulated through Zoning

The policy is enforced through zoning regulations, demonstrating formal legal recognition and enforcement mechanisms.

Being Implemented

The policy is actively being implemented (either by city agency or food systems collaborators), with specific actions, programs, or initiatives in progress to achieve its objectives.

Example of a high scoring policy: Community Gardens (four points) are referenced in the Blueprint Denver, in multiple localized plans, are currently being regulated through zoning, and are being implemented by one or more city agencies/departments.

Example of a low scoring policy: Food Processor (one point), no reference in the Comprehensive Plan 2040 nor the Blueprint Denver plan, being regulated through zoning, and there are no active efforts towards implementation.

Understanding Food Access through GIS Mapping

In addition to assessing the policies for local food production, retail, distribution, procurement and access, FIC assessed geographic maps to understand the existing conditions to food assets and opportunity areas in Denver. The GIS analysis first identified relevant data sources, pinpointing food access and production locations by address, formulated research questions for guidance, and gathered and refined data to create maps. The maps looked at food access points, agriculture, food retail, demographics, and zoning. Restaurants were not included in the analysis, because the focus of FIC is on free or affordable access to fresh food retailers, particularly in under-resourced areas.



All collected data was imported into GIS software to create maps to help better visualize how the city's food access points are distributed across different neighborhoods. The analysis also studies how the locations of food access and agricultural production locations relate to sociodemographic factors such as income, age, and race, and Denver's zoning regulations. By looking at the existing conditions of food access maps, FIC can better understand how Denver's food policies are or are not being implemented.

Below is each map layer followed by the data sources reviewed (see key terms for definitions and examples):

FOOD ACCESS POINT MAP LAYERS

The layers listed here are in the same order as the legends on the maps. Each bullet point represents the locations residents access food.



Farmers Markets and Farm Stands

- Data source: Denver Department of Public Health and Environment, Jefferson County Colorado Public Health, 2024²³



No-cost Food Assistance

- Data source: Denver Department of Public Health and Environment, Jefferson County Colorado Public Health, 2024²³



Food Pantries (Traditional and Nontraditional)

- Data source: Denver Department of Public Health and Environment, Jefferson County Colorado Public Health, 2024²³



Food Production

- Data source: Denver Department of Public Health and Environment, Jefferson County Public Health, 2024²³



Community Gardens

- Data source: Denver Urban Gardens²⁴



Farms and Ranches

- Data source: Denver Department of Public Health and Environment, Jefferson County Colorado Public Health, 2024²³



Food Retail

- Data source: Denver Food Retail Licenses 2022²⁵
 - Specialty stores i.e., Meat markets, fruit and vegetables, fish, and seafood markets, etc.
 - Convenience stores i.e., CVS, Walgreens, 7-Eleven, etc.
 - Small supermarkets and other grocery¹ i.e., Trader Joe's, Natural Grocers, Lowes Mercado, etc.
 - Large supermarkets and other grocery i.e., King Soopers, Safeway, Walmart, Sam's Club, Costco, etc.
 - WIC-accepting stores: Data source: Colorado Department of Public Health & Environment, 2024²⁶
 - SNAP-accepting stores: Data source: U.S. Department of Agriculture, 2024²²

1 Supermarkets and grocery are interchangeable throughout this document.

DEMOGRAPHIC LAYERS



Socioeconomic Index

- Data source: Jefferson County Colorado Public Health, 2024 using U.S. Census American Community Survey 5-year data, 2021.²⁷



Median Household Income

- Percent of population by age: 65 and older, 18-64, 5-17, under 5



Percent of Population by Race and Ethnicity

- Native American
- Asian
- Black or African American
- Hispanic/Latino
- Non-Hispanic White

ZONING LAYERS



Farm Stands, Farmers Markets, Food Pantries, Commercial, Urban Agriculture

- Data source: Denver Zoning Code, 2019²⁸



Major Streets and Neighborhoods

- Data source: City and County of Denver, Department of Transportation and Infrastructure, 2024²⁹



Mapping Out the Policy Landscape

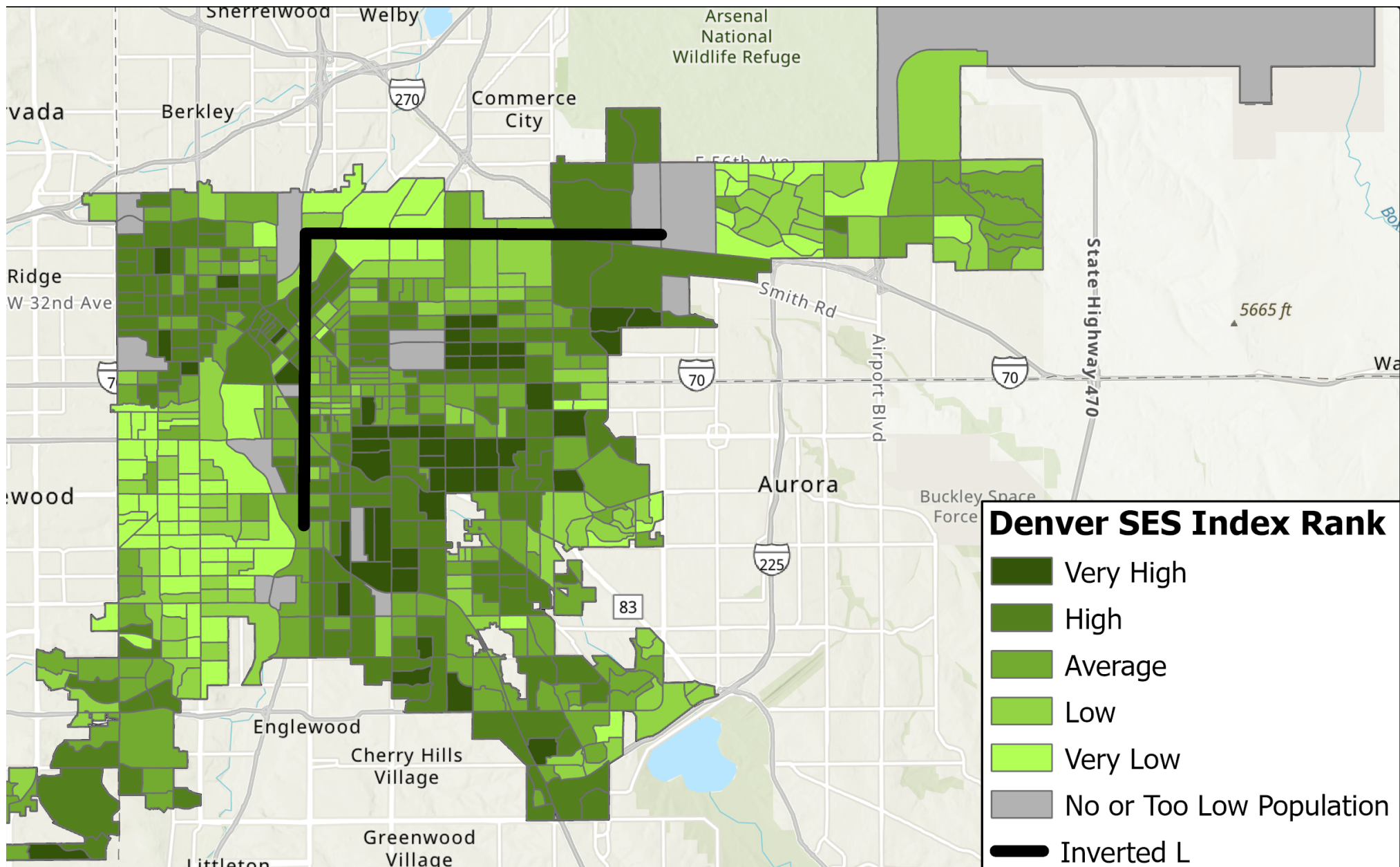


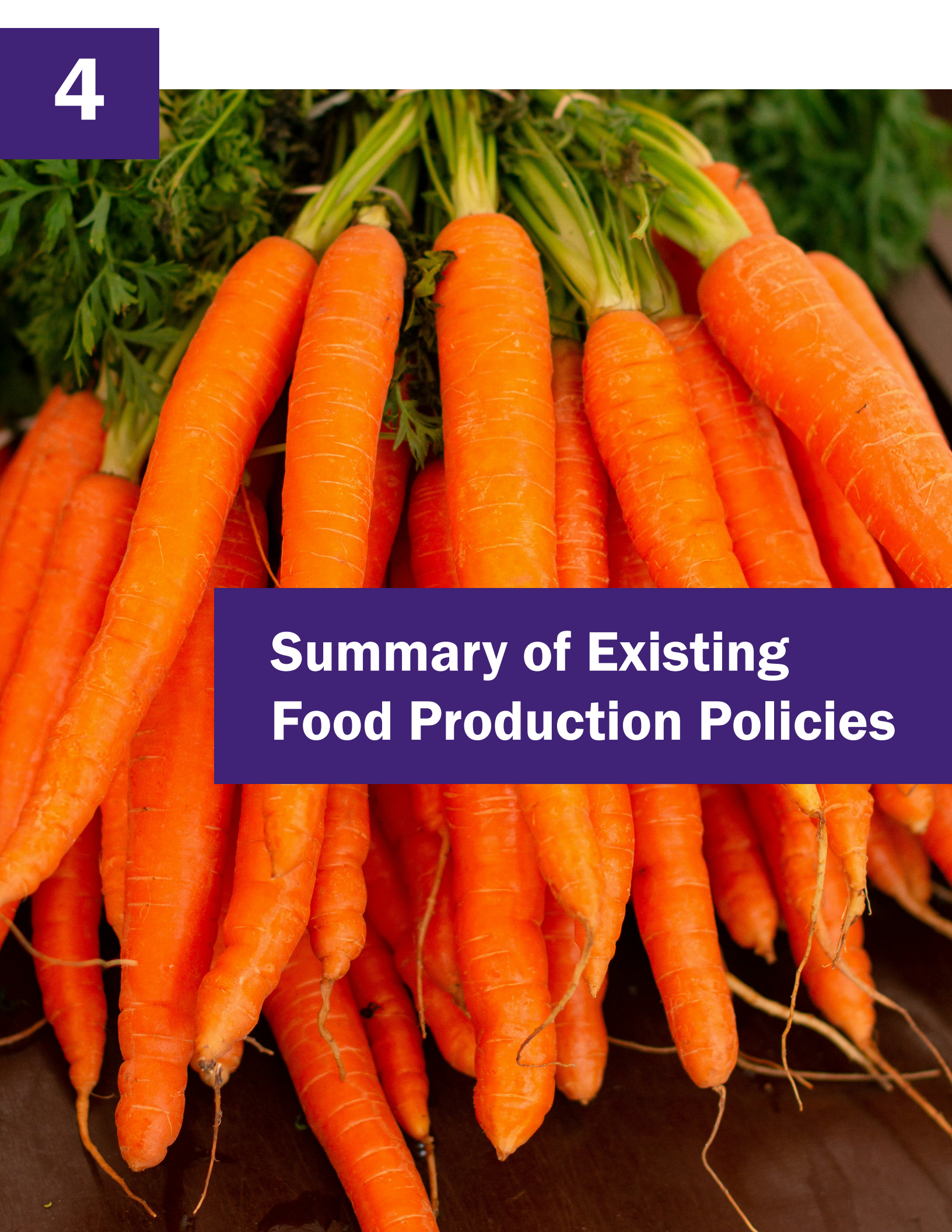
Figure 1. Denver's Socioeconomic Status Index Rank and the Inverted L

This Socioeconomic Status (SES) Index Rank shown in this map is a measurement used to assess the socioeconomic status of neighborhoods within Denver. Socioeconomic indexes combine many different demographic and social factors to better understand a geographic area's relative social or financial disadvantage and lack of disadvantage. The lighter the green shades, the lower the SES Index Rank which translates into less access to financial, educational, social and health resources. Data source: Jefferson County Colorado Public Health, 2024 using U.S. Census American Community Survey 5-year data, 2021.²⁷ This SES Index Rank includes the following demographic indicators:

- Total population
- Total households
- Percent in group quarters
- Median age
- Education Index
- Percent poverty
- Median income
- Percent unemployed
- Crowded (percent of households with more than one person per bedroom)
- Very crowded (percent of overcrowded households with >1.5 people per bedroom)
- Median rent
- Median house value
- Percent blue collar workers
- Percent Households spending 30% or more on housing

This map also shows the concept of the 'inverted L' in Denver and shows a deeply entrenched urban development pattern of socioeconomic disparities across neighborhoods, perpetuating inequalities in food access and economic mobility. This pattern is delineated by the boundaries of Interstate 70 (I-70) running east-west and Interstate 25 (I-25) running north-south and creates a stark divide in the city's landscape. Rooted in historical racially discriminatory practices, the "inverted L" shows the enduring legacy of systemic inequalities that continue to shape which communities have or lack access to food and other critical resources. Historical practices of racial and economic segregation have played a pivotal role in shaping the "inverted L."

Discriminatory land use policies, redlining, and urban renewal initiatives have systemically marginalized certain communities, developing areas with limited resources and opportunities. While these practices were not explicitly food-related, their downstream effects have profound implications for food access and economic vitality. Housing displacement, a scarcity of green spaces, inadequate educational opportunities, and notably, limited access to healthy food options, are all hallmarks of the "inverted L" phenomenon.



Summary of Existing Food Production Policies

This section will cover a comprehensive summary of existing policies relevant to food access within the City and County of Denver. These policies have been categorized into four primary areas: Local Food Production, Food Retail, Distribution and Procurement, and Food Access. Each plays a significant role in shaping the community’s access to food.

Each primary area will start with an overview, background information, and definitions of key terms for context. The review of the 16 data sources relating to each primary area examined several key terms. Recognizing that FIC’s food systems collaborators may use these terms differently, each section will define the key terms. These key terms will be presented and evaluated within a table, identifying the policy score (implementing the four-point scale). Then, this section will go deeper into each key term, highlighting policy strategies, successes, implementation efforts, a map analysis, the identified gaps, and policy recommendations.



LOCAL FOOD PRODUCTION



FOOD RETAIL



DISTRIBUTION AND PROCUREMENT



FOOD ACCESS

Local Food Production

Local food production is the umbrella term being used to describe activities such as urban agriculture, community gardens, food producing animals, and natural resources. These terms were chosen for simplicity and because they were the standard language used throughout the policy documents that were reviewed.



The specific terms reviewed include:

- **Food Production:** the process of cultivating and harvesting food for consumption or sale.
- **Zoning Code definition of Agriculture:** cultivation, production, keeping, or maintenance for personal use, donation, sale or lease, of: (1) plants, including but not limited to: forages and sod crops; grains and seed crops; fruits and vegetables; herbs; and ornamental plants; and (2) livestock, including but not limited to: dairy animals and dairy products; poultry and poultry products; cattle and cattle products; or horses. Specific Agriculture Use Types: Aquaculture, Urban Garden, Husbandry Animal, Husbandry Plant, Plant Nursery
- **Garden, Urban:** Land that is (1) managed by a public or nonprofit organization, or by one or more private persons, and (2) used to grow and harvest plants for donation, for personal use consumption, or for off-site sales by those managing or cultivating the land and their households. This use does not include or permit the growing of marijuana.
- **Husbandry, Animal:** The cultivation, production, and management of animals and/or by-products thereof, including, but not limited to grazing of livestock and production of meat, fur, or eggs; excluding, however, feed lots, hog farms, dairies, poultry and egg production facilities, beekeeping and apiaries, horse boarding, and riding stables.
- **Husbandry, Plant:** An agricultural use, other than a Plant Nursery, in which plants are cultivated or grown for the sale of such plants or their products, or for their use in any other business, research, or commerce; excluding, however, forestry and logging uses. This use includes the cultivation or growing of marijuana.
- **Plant Nursery:** An agricultural use in which plants are grown, cultivated, produced, or managed for the on-site or off-site sale of such plants or their products, or for their use in any other business, research, or commerce. Other customarily incidental products may be sold with the plants. Permit the growing of marijuana.
- **Natural Resources:** termed used to encompass water, waste, soil, native plants, and pollinator-safe actions.

Policy Scores for Local Food Production

Policy Score	Referenced in Comprehensive Plan 2040/ Blueprint Denver	Referenced in Localized Plan	Regulated Through Zoning	Being Implemented	Total Score
Food Production	Comprehensive Plan 2040	Neighborhood Planning Initiative (NPI), Denver Food Vision (DFV)	No	CASR, Sustainable Food Policy Council (SFPC)	3
Agriculture	No	NPI One Water Plan	Yes, permitted uses Under husbandry for plants	SFPC, Denver Parks and Rec (DPR), CASR	3
Community Gardens	Blueprint Denver	NPI, DFV, One Water Plan, Game Plan for a Healthy City	Yes, permitted uses Under urban gardens and plant nursery	DDPHE, Denver Parks and Rec (DPR), Office Social Equity and Innovation (OSEI)	4
Food Producing Animals	No	No	Yes , husbandry for animals	SFPC	2
Natural Resources	Comprehensive Plan 2040	NPI, DFV, One Water Plan Game Plan for a Healthy City	Yes	Department of Transportation & Infrastructure (DOTI), DPR, DDPHE, SFPC	4

Figure 2. Policy Scores for Local Food Production

FOOD PRODUCTION

Food Production received an overall score of three, indicating multiple policy references across various city planning documents. The Comprehensive Plan 2040 specifically highlighted food production in terms of *encourage[ing] climate-smart food production practices*.¹ Most of the subsequent references were found in the neighborhood-specific plans. The policies aim to enhance food production by promoting *the cultivation of gardens and edible landscapes, preserving designated areas for growing food, promoting on-site food growing at food pantries, and reducing regulatory obstacles for selling locally grown produce through initiatives like the Cottage Foods Act*.⁸⁻¹² Additionally, the policies speak to integrating food production into new housing developments to improve self-sufficiency for residents. There is also a reference to understanding barriers to growing food on public land for effective implementation of food production initiatives. It was also described in the Denver Food Vision in terms of expanding food production and sharing across the city through community-led and supported projects.

In terms of implementation, the Sustainable Food Policy Council (SFPC) is actively exploring increasing public land access for the purpose of growing food on public land and have been working with Denver Parks and Recreation (DPR) to inform an upcoming request for community input on future projects and to look at other innovative methods of incorporating food production into city-owned land. Also, the Denver Office of Climate Action, Sustainability, and Resiliency (CASR) has a staff position dedicated to food sovereignty and environmental justice that will be focusing on food production within Denver.

AGRICULTURE

Agriculture received an overall score of two as there was little to no policy language specifically referencing agriculture. Defining agriculture through the lens of city plans and zoning was difficult as there is no standard definition provided in the reviewed data sources. The only definition found in the plans was through the zoning code as defined above. The main references highlighted in the plans included the Denver One Water plan in terms of *strengthen[ing] connections between land, water, food, and energy by linking water for agriculture for increased food access*. Similarly, the Denver Food Vision spoke to *preserve[ing] regional agricultural systems through regenerative and climate smart food systems and supporting pilot projects and research on innovative urban agriculture production models*. This could include greenhouses, vertical growing, and rooftop agriculture.

Additionally, multiple Neighborhood Plan Initiatives discussed *promoting urban agriculture projects including edible landscapes to increase community food access*. Despite several mentions to broad agricultural support throughout the city, there was limited mention specific to agriculture within Denver zoning code beyond parking requirements for agricultural land uses and supporting plant husbandry in most zones under certain conditions.

In terms of implementation, as referenced above the SFPC has been working with DPR to explore accessing public and city-owned land to grow food for community use. CASR will be focusing on food and climate justice, funding projects that help improve and strengthen the local food system by increase access to fresh and healthy food, strengthen local food system infrastructure, and improve local natural resource management and best practices. CASR and DPR are also working specifically on edible landscapes pertaining to planting food producing trees in under-resourced neighborhoods.

GARDENS

Gardens received an overall score of four, indicating multiple references across plans, regulatory processes are in place, and implementation projects are being actively explored or initiated. Gardens appeared in multiple forms across city plans and varied in type from home, community, and urban gardens, in addition to being referenced with other key terms such as community food production. The framing of the respective terms focused primarily on the role of community gardens and a few mentions focused specifically on home gardens.

Key plans like the Blueprint Denver prioritize *supporting community hubs for gardening initiatives and promoting diverse forms of community gardening*.² Similarly, other policy documents advocate for collaborative development

projects, identifying spaces for community gardens, and reducing regulatory barriers. Through zoning, urban gardens are permitted as limited uses with zoning permit review required in all districts. Gardens are characterized as an accessory to residential and nonresidential uses and are permitted with limitations in all districts.

Gardens were also referenced in terms of the Colorado Cottage Food Act, which allows limited types of food products that are non-potentially hazardous (do not require refrigeration for safety) to be sold directly to consumers without licensing or inspections.²¹ Strategies in the Neighborhood Plan Initiatives and Denver Food Vision mentioned expanding public awareness and use of the Cottage Food Act and promoting opportunities to share food through residential sales of fresh produce, cottage foods, and donating excess food to local food pantries and hunger relief organizations. The zoning code prohibits the direct retail or wholesale of goods or products derived from a garden accessory to a primary residential use unless permitted as a fresh produce and cottage foods sale home occupation use.

Community and urban gardens are an area where the city has historically devoted time and resources in implementing food production strategies. DDPHE has both designated staff and a programmatic funded policy being implemented through the Healthy Food for Denver's Kids (HFDK) program, a special tax initiative funding many of the priority areas specified in the Denver Food Vision, specific to Denver youth, such as urban gardens. This is also an area where DPR has done a lot of work through a contract with Denver Urban Gardens (DUG), conversations with other community organizations and through strategic planning on how to use existing spaces such as recreation centers to maximize opportunities for gardens and increase intentional community engagement.

FOOD PRODUCING ANIMALS

Food Producing Animals received an overall score of two. This is an area where there was no reference to food producing animals in any of city plans and a singular reference was included in the zoning code. The zoning code regulates chicken coops as an allowable detached accessory structure in certain zones. Chickens and ducks are allowed to be kept when meeting certain conditions. Livestock was also specifically referenced in zoning related to allowable uses/structures in the National Western Center (NWC) zones. Outside of the NWC, livestock uses are allowed but must be a certain distance from residential uses or units. In the past the SFPC supported a policy advisory and ordinance that allows for up to eight chickens or ducks, plus two dwarf goats to be raised on a property.

NATURAL RESOURCES

Natural resources received an overall score of four. Key components include irrigation, compost, and pollinators. In terms of irrigation, the One Water Plan recommends the construction of green stormwater infrastructure in streets and public spaces to manage stormwater runoff effectively and improve water quality.¹³ This approach is integrated into the Comprehensive Plan 2040, which emphasizes incorporating stormwater management into urban development through green infrastructure to enhance water quality and reduce runoff.¹ Zoning regulations mandate the maintenance of landscape areas, including watering as necessary, with allowances for water tanks.¹⁵ Additionally, implementation efforts by DPR have led to the conversion of 581 acres to treated recycled water irrigation from potable water.³

Regarding composting, Neighborhood Plan Initiatives support food recovery and waste reduction through education and the city's composting program, as well as advocating for adding compost as a public amenity in centers and corridors. The Denver Food Vision also seeks to reduce the amount of food going to waste, which aims to increase Denver's solid waste diversion rate and reduce food waste. The DDPHE Food Matters program is proactive about education and promotion of composting and has collaborated with the Denver Department of Transportation and Infrastructure (DOTI) on projects that encouraged restaurants to compost organic material. DOTI has expanded compost collection services across the city to all single-family residences in 2024.

Neighborhood Plan Initiatives referenced connecting property owners to resources supporting the installation and maintenance of trees that benefit pollinators. Additionally, the Denver Food Vision includes education initiatives to raise awareness about protecting native pollinators. A goal for 2024 for the SFPC is to explore actions to further support pollinators. An issue brief from the SFPC proposed landscape enhancements, pesticide restrictions, and public education to safeguard pollinator populations, to be reviewed by the SFPC to act in 2025.

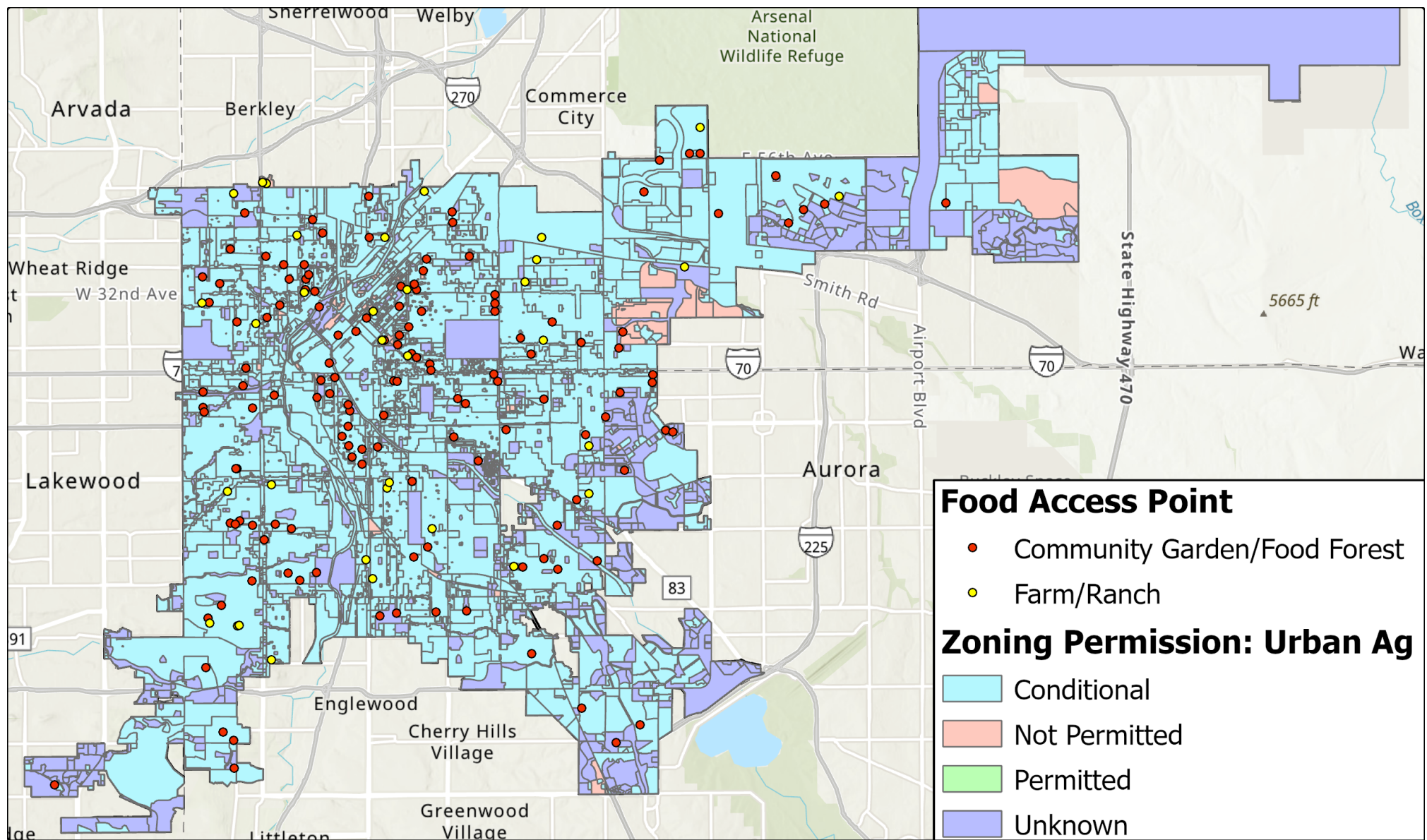


Figure 3. Community Gardens/Farms/Ranches and Urban Agriculture Zoning

This map displays the location of food production or agriculture points in Denver, distinguishing between community gardens marked with red dots and farms or ranches indicated by yellow dots. Currently, there are 24 farms/ranches and 150 community gardens in Denver. The community gardens are primarily located in areas with urban agriculture zones which have conditional use zoning, depicted by the light blue color on the map. These zones allow for community gardens but impose restrictions which may limit the establishment of larger food production sites like farms and ranches.

Areas of Opportunity within Local Food Production

There is a lack of explicit recognition and regulatory enforcement of local food production in the Comprehensive Plan 2040 and the Blueprint Denver plan, highlighting the need for integration of food production initiatives into citywide planning documents. Similarly, agriculture policies have limited references and terminology in city plans and zoning regulations, indicating a need for clear language and consistent definitions to support agricultural activities effectively. The section on gardens showcases progress in policy and implementation efforts, yet there are gaps in regulatory enforcement and specificity in zoning regulations for certain garden types. There are also gaps in understanding the impact of implementing gardens within the city, and there is a need for a more detailed evaluation to be done before continuing to expand this work. Furthermore, the limited references to food-producing animals underscore the need for explicit policies and regulations to support urban agriculture practices. While natural resources received comprehensive coverage in plans there is a lack of detailed implementation strategies for initiatives such as pollinator support.

Local Food Production Policy Recommendations

The following policy recommendations were developed from the findings within the local food production section and the areas of opportunities listed above:

Neighborhood Urban Food Production



- Provide more guidelines and regulations for urban agriculture practices to ensure alignment with surrounding land uses and environmental sustainability and climate resiliency.
- Streamline permitting processes to expand the creation of farm stands in neighborhoods to improve support for small-scale agricultural enterprises within residential areas.
- Designate protected areas for community gardens established on public property. This would support open space designated for use as community gardens, giving community gardens the same protections as other types of open space use in zoning regulations.
- Designate city or privately owned vacant land in residential areas where community gardening activities can expand beyond “accessory uses” to promote farming or gardening.
 - This could include establishing a community land trust specifically for urban agriculture, acquiring vacant or underutilized land for lease to urban farmers and community gardeners at affordable rates.
- This could include preserving urban agricultural land for long-term agricultural use and protect it from development pressures, ensuring continued access to space for food production in Denver.
- Offer technical assistance and resources to support urban farmers in navigating zoning regulations, obtaining permits, and complying with health and safety standards.

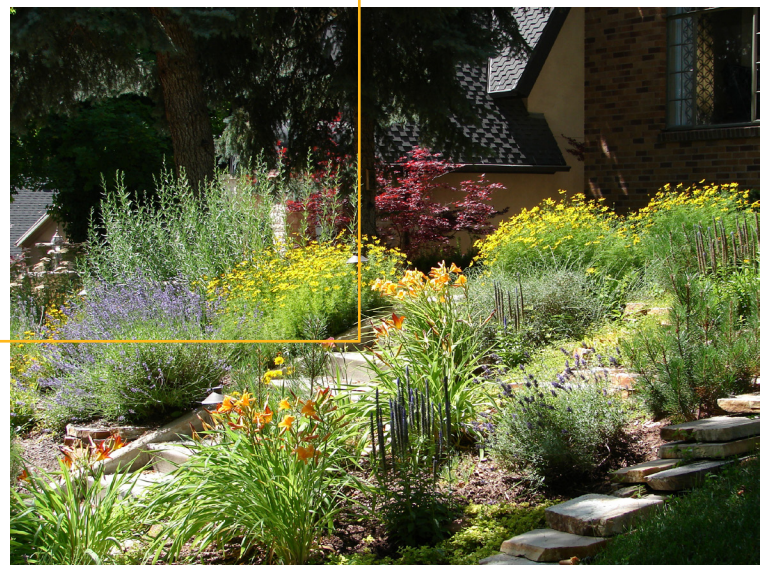
Incentives for Development Areas Identified as Mixed-Use



- Expand community gardens as an approved land use in diverse zoning categories, including residential, multi-family, mixed-use, industrial, and commercial zones, as determined by community preferences.
- Encourage and work with developers to include space for urban agriculture within new residential, commercial, and industrial developments to promote local food production.
- Streamline permitting processes for mixed-use developments that incorporate food production spaces, such as rooftop gardens, community gardens, or indoor hydroponic systems.

Sustainable Landscaping Practices

- Restrict turf grasses in new residential developments and require the implementation of permaculture and low water use landscaping practices that prioritize native plant species and support pollinator habitats. These measures aim to conserve water resources and enhance biodiversity in urban environments.



Food Retail

Reviewing food retail was challenging due to unclear and variable, use of terminology across the 16 different data sources. To streamline the analysis, seven distinct food retail references were identified and analyzed. The following terms were selected for their simplicity and alignment with the existing terminology used in the reviewed policy documents.



The specific terms reviewed include:

- **Food retail:** Retail establishments primarily engaged in the retail sale of food and beverages for off-site or home consumption. Typical uses include supermarkets, groceries, markets, or delicatessens.
- **Large/small grocery:** There is no standard definition of large/small grocery stores, but the U.S. Department of Agriculture (USDA) defines grocery stores as establishments generally known as supermarkets and smaller grocery stores primarily engaged in retailing a general line of food, such as canned and frozen foods; fresh fruits and vegetables; and fresh and prepared meats, fish, and poultry. For the purposes of this assessment, the definition includes grocery stores, supermarkets, supercenters, and warehouse club stores.
- **Convenience/corner stores; specialty:** There is no standard definition of convenience stores/corner stores in Denver planning documents, but the USDA defines them as stores primarily engaged in retailing a limited line of goods that generally includes milk, bread, soda, and snacks. For the purposes of this assessment, this definition includes convenience stores, corner stores, and delicatessens.
- **Food trucks/mobile market:** Readily movable motorized-wheeled vehicle designed and equipped to serve/sell/distribute food or towed-wheeled vehicle designed and equipped to serve/sell/distribute food.
- **Commercial kitchen/commissary kitchen:** Commissary shall mean an approved catering establishment, restaurant, or other approved place in which food, containers or supplies are kept, handled, prepared, packaged, or stored.
- **Retail food establishment:** A retail operation that stores, prepares, or packages food for sale for human consumption or serves or otherwise provides food for sale for human consumption to consumers directly, or indirectly through a delivery service, whether such food is consumed on or off the premises.
- **Farmers market:** There is no standard definition for a farmers market in any of the planning documents, but the national Farmers Market Coalition defines them as a public and recurring assembly of farmers or their representatives selling the food that they produced directly to consumers. 31

Policy Scores for Food Retail

Policy Score	Referenced in Comprehensive Plan 2040/ Blueprint Denver	Referenced in Localized Plan	Regulated Through Zoning	Being Implemented	Total Score
Food Retail	Comprehensive Plan 2040	Denver Food Vision, Neighborhood Planning Initiative (NPI)	Parking regulations and Permitted and Conditional in certain areas	DEDO, EXL, DDPHE, DHA, HOST	4
Large and small grocery stores	Blueprint Denver	DFV, NPI	Permitted and Conditional in certain areas	DEDO, EXL, DDPHE, DHA, HOST	4
Corner Store	No	NPI	No	DDPHE	1
Retail Food Establishment	No	NPI	Mobile food businesses are allowed under specific conditions	HBP, DDPHE, DEDO	3
Farmers Market	No	NPI, DFV	Seasonal permitted uses	SFPC	3
Food Trucks and Mobile Markets	Comprehensive Plan 2040	NPI	Mobile food businesses are allowed under specific conditions	SFPC, DEDO	4

Figure 4. Policy Scores for Food Retail

This table shows policy scores for food retail which includes large and small grocery stores, corner stores, retail food establishments, farmers markets, food trucks and mobile markets.

FOOD RETAIL

Food Retail received an overall score of four. While the policy is referenced across various documents, it falls short of comprehensive implementation measures. Food retail is mentioned in key city plans such as the Comprehensive Plan 2040, indicating recognition of its *importance in fostering a vibrant food economy and promoting access to fresh food retailers*, particularly in low-income and under-served areas.¹ Additionally, it is supported by Neighborhood Plan Initiatives and the Denver Food Vision, which outline *improvement of food retail accessibility and affordability while fostering economic growth and community well-being*.^{4;8-12}

Strategies also aim to promote neighborhood food retail options, foster innovative retail models, and streamline permitting processes to ensure increased affordability and decreased availability of unhealthy food options. Technical assistance (TA), multilingual supports, and initiatives to address barriers to food-related business development were key recommendations mentioned in Neighborhood Plan Initiatives. Additionally, infrastructure enhancements such as improved transit networks and pedestrian infrastructure aim to facilitate access to fresh food retailers while regulatory measures seek to limit the expansion of fast-food outlets.⁸⁻¹² They also encourage the acceptance of federal food assistance programs and funding to support local food entrepreneurs, alongside providing economic incentives to grocery stores or food businesses in areas lacking food access.⁸⁻¹²

Regulation through zoning exists, with exemptions provided for certain retail establishments in mixed-use commercial zones, and other permitted and conditional uses across the city indicating formal/legal recognition. Zoning also regulates vehicle parking requirements for establishments selling food or providing market eating facilities.

Implementation efforts include a push to recruit and retain full-service retailers in neighborhoods lacking adequate food access, alongside initiatives to promote neighborhood food retail options and foster innovative retail models, led by entities like the Denver Housing Authority (DHA) with Decatur Fresh Market in the Sun Valley neighborhood, and the Noir Market Co-Op in the Elyria-Swansea neighborhood. Both of these were big accomplishments given that these neighborhoods are considered food apartheid. Additionally, there is continued support for programs offering technical assistance and multilingual aid to food businesses, facilitated by programs like FIC and under the City and County of Denver's Executive Order 150 for Language Access.

Continued work to fund local food entrepreneurs, foster community wealth-building, address barriers to innovation in food-related businesses, and develop culturally responsive marketing strategies is ongoing with projects supported by the Denver Department of Economic Development & Opportunity (DEDO). Initiatives such as the work being done by the Colorado Blueprint to End Hunger in encouraging food retailers to accept federal food assistance as a form of payment to increase community-level food access. Collaborative groups like the DDPHE's Food Inter-agency Group (FIG) business sprint group are also actively working towards improving permitting processes and providing incentives for food businesses operating in areas with limited food access.

LARGE AND SMALL GROCERY STORES

Large and small grocery stores received an overall score of three, indicating a substantial presence in policy references and ongoing implementation efforts. Policy references in Blueprint Denver emphasize the promotion of grocery store development to meet community needs, improve accessibility, and ensure inclusion in planned developments.² Many Neighborhood Plan Initiative recommendations for food retail specified "large and small grocery stores." Neighborhood Plan Initiatives outline various strategies such as creating mixed-use cultural hubs, supporting innovative grocery models, and improving food quality through funding and streamlined permitting processes.⁸⁻¹² The zoning code defines retail establishments primarily engaged in food sales and outlines permitted and conditional uses across the city.¹⁵

Implementation efforts include projects like mixed-use developments with attached grocery stores and support for innovative food retail models in low-access areas. Funding initiatives like the Healthy Corner Store project and efforts to streamline permitting processes contribute to the ongoing support and maintenance of healthy food options in low-access neighborhoods. In addition, these efforts are further supported through a local food incubator program and other supports from FIC, DEDO, and the Department of Excise and Licensing (EXL).

CORNER STORES, CONVENIENCE STORES, AND SPECIALTY STORES

Corner stores, convenience stores, and specialty stores received an overall score of one, indicating limited policy support and implementation. While neighborhood plans encourage these small retailers to offer expanded healthy food options, there is currently no active implementation of this policy due to a lack of sustainable funding. In the past, the Healthy Corner Store Initiative aimed at supporting corner stores in increasing their capacity to sell healthy, affordable foods to residents in under-served neighborhoods. The DDPHE program operated in 2015-2018 and worked with corner stores in terms of infrastructure to support healthy food access and navigating barriers related to incorporating federal nutrition programs. While improving a store's ability to include healthier food options was achievable, promotion of the expanded food options was challenging for communities not accustomed to purchasing healthy food from a corner store. In addition, embedding systems to accept payments from federal nutrition benefit programs required expanded funding and technical assistance was a major barrier for the program's success.

RETAIL FOOD ESTABLISHMENTS

Retail food establishments received an overall score of three. Retail Food establishments came up in several Neighborhood Plan Initiatives and mentioned initiatives such as recruiting healthy fast casual restaurants, incentivizing existing restaurants to offer healthier options, and developing shared kitchen facilities to support small food businesses.⁸⁻¹²

Zoning code regulations allow for mobile food businesses and establishments primarily engaged in food preparation for off-premises consumption.¹⁵ Implementation efforts include programs like "Rethink Your Drink," the Colorado Smart Meal Program, the regional Healthy Beverage Partnership (HBP), support from the Food Incubator, and food retail funding from DEDO. Moreover, the city is supporting businesses through the DDPHE Food Matters program, which actively helps businesses in reducing the amount of food being wasted by providing food waste-reduction tips and resources, ultimately diverting food waste to food recovery.

FOOD TRUCKS AND MOBILE MARKETS

Food trucks and mobile markets received an overall score of four. The Comprehensive Plan 2040 emphasizes *leveraging food businesses to boost economic opportunities*,¹ while Neighborhood Plan Initiatives prioritize exploring *opportunities for food trucks and mobile markets in parks, promoting mobile markets and food delivery options, and encouraging shared use of school areas for community gardens or farmers markets*.⁸⁻¹² Zoning regulations allow mobile food businesses under specific conditions, further facilitating their presence and operation in the city.¹⁵ In terms of implementation, the SFPC previously proposed regulatory changes in the permitting process to support mobile grocery retailers, aligning with city goals for healthy food access, transportation, and economic development. This work led to a mobile food truck advisory council for consideration.

FARMERS MARKETS

Farmers markets received an overall score of three. There was no reference in the Comprehensive Plan 2040 or the Blueprint Denver specific to farmers markets. The Neighborhood Plan Initiatives emphasize identifying suitable public property for outdoor markets and facilitating their development in collaboration with community groups. They also aim to *connect organizations to funding sources, support farmers markets and community-supported agriculture programs, and encourage acceptance of federal nutrition assistance programs like SNAP and WIC*.⁸⁻¹² The Denver Food Vision prioritizes streamlining permitting processes to *expand public spaces for non-permanent fresh food retail*, which may include farmers markets.⁴ Zoning regulations are terms vague on farmers markets specifically, but permit seasonal outdoor sales, allowing for the operation of farmers markets under specific conditions. Implementation efforts include initiatives through the SFPC, to help expand access and usage of the SNAP benefits at farmers markets within the City and County of Denver.

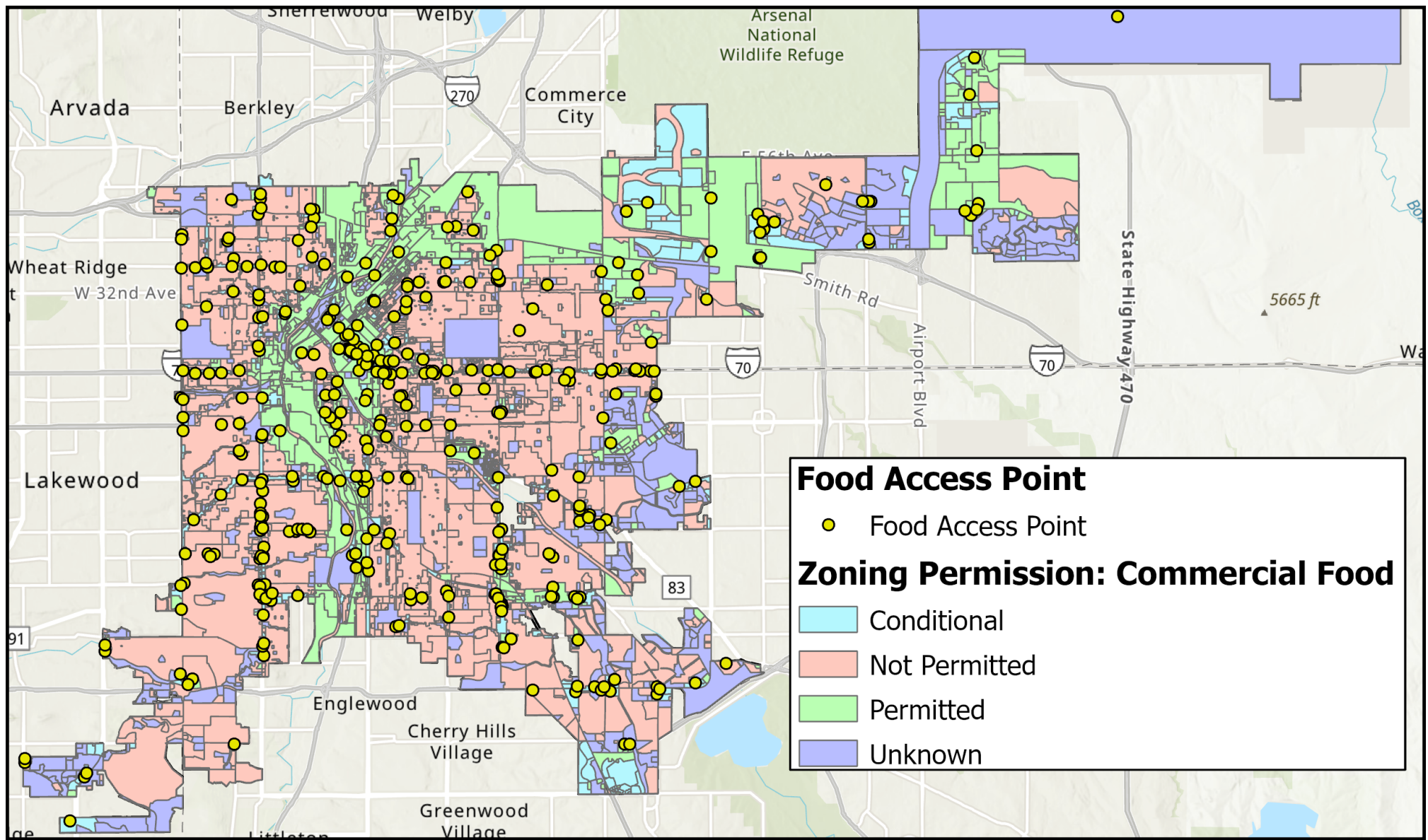


Figure 5. Food Access Points and Commercial Zoning

This map depicts food retail locations in Denver, including specialty markets, convenience stores, and large and small grocery stores. The map shows the pattern of food retail locations indicating a higher density of food retail within the permitted zoning areas, highlighting the “inverted L”. This map was developed to understand whether zoning regulations restrict the current locations of food retail points. The food retail points are concentrated within the “inverted L”, particularly in downtown Denver and along major corridors like Colfax Avenue and Federal Boulevard. To provide further detail, a zoomed-in view is included below with an example of how food retail locations relate to local zoning requirements within the example of the Denver neighborhood of Elyria-Swansea.

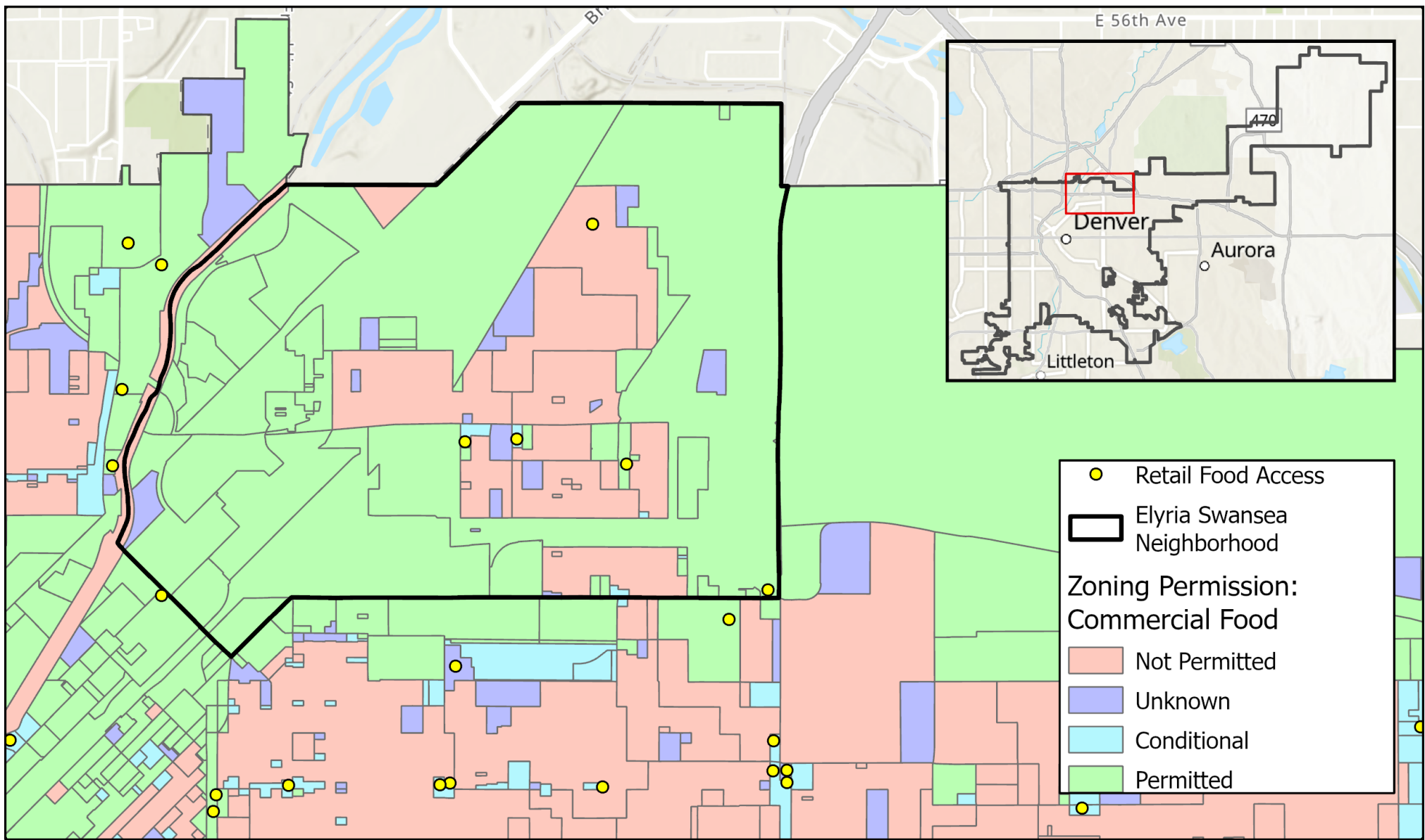


Figure 6. Elyria-Swansea neighborhood, Food Retail locations and Commercial Zoning

In Elyria-Swansea, most food access points, represented by maroon dots on the map, are situated within commercial zoning areas, either permitted or conditional, with one exception: the Swansea Corner Store. The Swansea Corner Store operates in a non-permitted commercial zone. The existence of food access points in areas where they are not officially allowed can happen for a few reasons. It could be because the rules about where they're allowed to locate have changed, there are exceptions to the rules with special Planning Board permissions, or they may have existed before the rules were put in place and are allowed to continue operating.

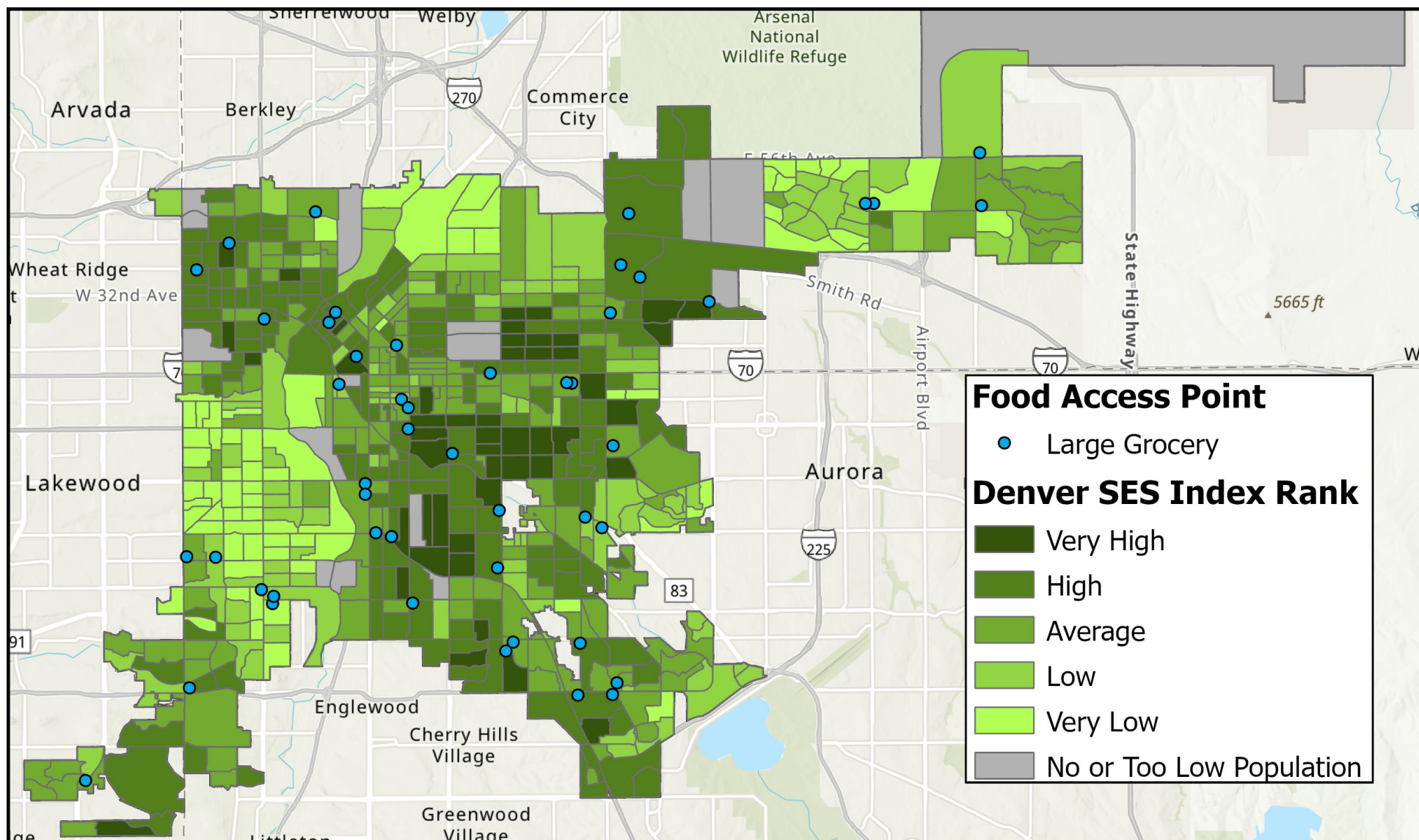


Figure 7. Large Grocery stores and the SES Index Rank

This map uses green shading to represent the SES index rank with lighter shades of green indicating lower economic index scores. The scores include such factors as median income, median rent, percentage of households spending more than 30% on housing, etc. The blue dots represent large full-service supermarket stores, such as Walmart, King Soopers, Sprouts Farmers Market, etc. The mapped pattern reveals that areas with the lowest socioeconomic index rates are usually situated outside the “inverted L” and have very few large full-service supermarket stores. The residents in these lower-income neighborhoods may struggle to find nearby fresh food options that are geographically close. Residents in these poorer areas may rely on smaller stores that offer fewer nutritious, fresh fruits, vegetable or protein choices and potentially higher prices due to an inability to purchase items in bulk. This disparity highlights the challenges faced by lower-income communities in accessing affordable, healthy food.

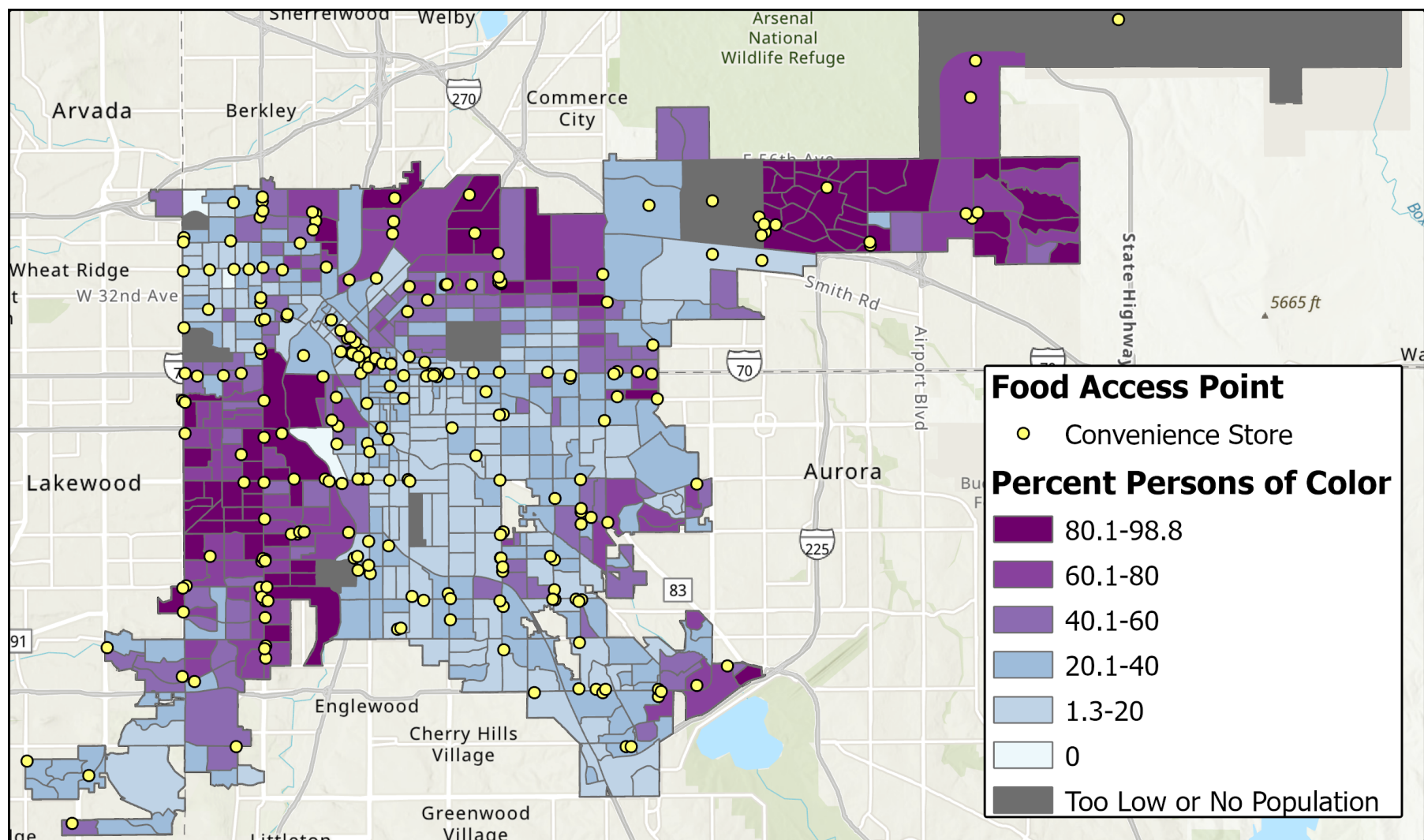


Figure 8. Convenience Stores and Percent Persons of Color of the Population

This map represents the presence and distribution of People of Color across Denver. ‘People of Color’ is an inclusive term used to refer to individuals who are not considered part of the majority non-Hispanic white racial group. The darker the shade of purple, the greater proportion of these race and ethnicities compared to the overall population. It encompasses a wide range of ethnicities and races from Census Data including Asian, Black or African American, Hispanic/Latino, and Native American.

This map also features yellow dots representing convenience stores, which are often referred to as corner stores, with or without a gas station, or a pharmacy/drug store. In terms of food access, convenience stores typically offer a limited selection of snacks, beverages, ready-to-eat foods, and basic groceries. Examples include CVS, Walgreens, 7-Eleven, and locally owned convenience stores.

When comparing this map (Figure 8) with the map in (Figure 7) depicting convenience stores, a pattern emerges: residents of neighborhoods with a low economic index, who have limited or no large supermarkets nearby, primarily have access to convenience stores. Additionally, when residents must travel outside their neighborhoods to access nutritious food, local businesses may lose potential revenue, further diminishing economic opportunities within the community and perpetuating a cycle of disinvestment and economic decline.

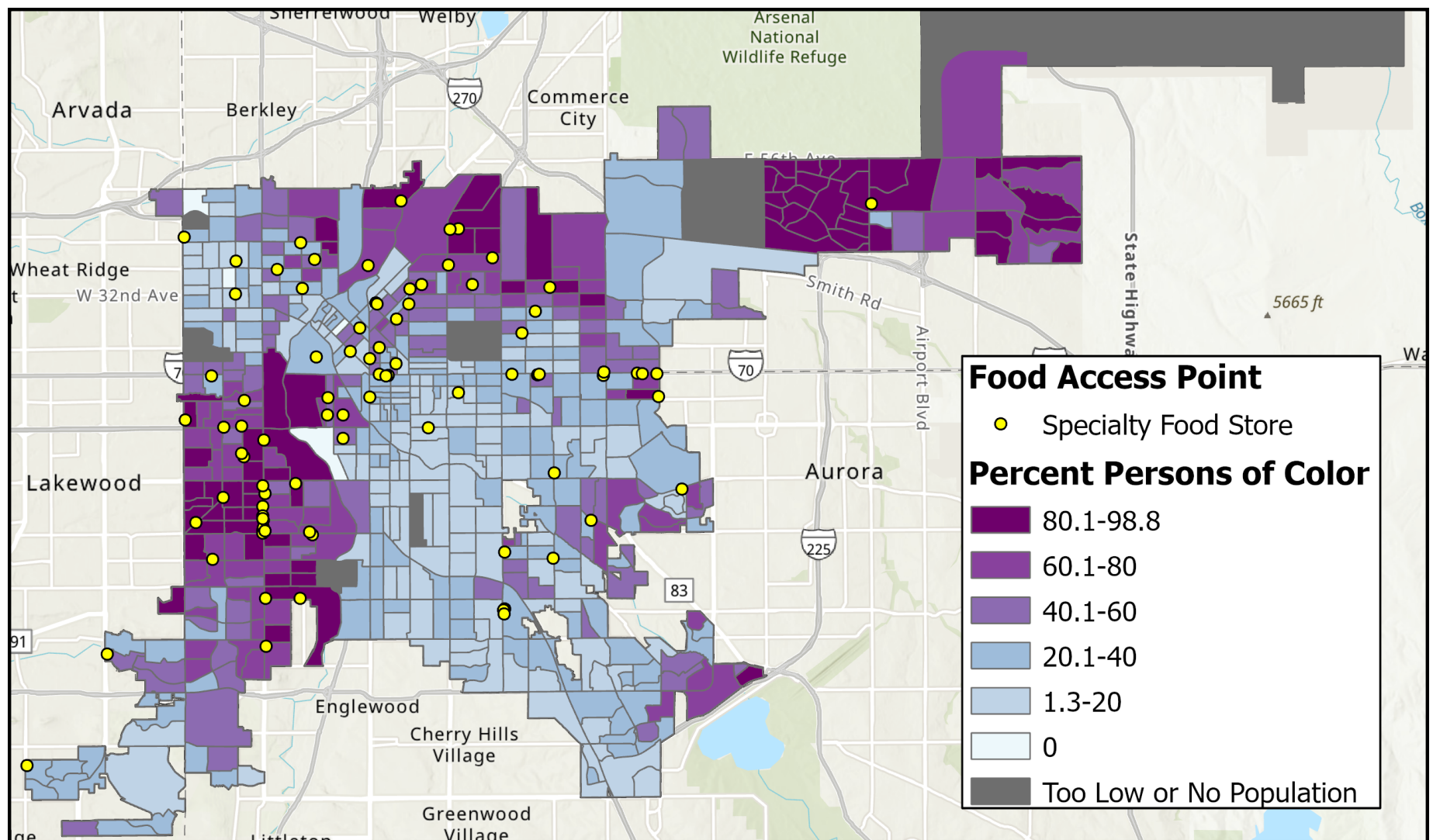


Figure 9. Specialty Food Stores and Percent Persons of Color of the Population

This map shows the distribution of specialty food stores, including meat markets, fruit and vegetable markets, and fish and seafood markets. Examples of these specialty food stores include carnicerias, cultural/ethnic markets, butchers, and neighborhood markets.

The pattern observed on the map highlights the geographic distribution of specialty food stores which happens to overlap with more diverse neighborhoods. A possible explanation is that the presence of specialty food stores and the demographic makeup of the neighborhood, may be influenced by the culinary preferences and cultural needs of the local community.

Figures 7-9 show where residents can buy food, the socioeconomic status of neighborhoods, the distribution of People of Color, and the location of large grocery stores versus convenience stores. Overall, the maps underscore the connection between food access, socioeconomic status, demographic distribution, and zoning regulations in Denver. They emphasize the need for comprehensive strategies to address food insecurity and promote equitable access to nutritious food for all residents, regardless of their socioeconomic status or neighborhood of residence.

Areas of Opportunity within Local Food Retail

Food retail plays a vital role in ensuring access to food within neighborhoods. Opportunities within food retail require a comprehensive and strategic approach, especially when supporting small food-related businesses rather than focusing solely on large grocery stores. Many recommendations emphasize attracting large retailers, and the challenge of bringing them to under-served areas continues to exist. This is often due to economic factors beyond the city's control and largely lies with the retailer itself and the perceived lack of economic benefits of establishing markets in low-income areas. These challenges represent larger issues of systemic racism and inequities in economic systems that require more expansive and coordinated national and local systems-level changes.

Rather than focusing on new grocery stores, an effort to reduce the amount of food wasted by grocery stores can be a more intentional approach that would support under-served communities, in that they can donate excess food or food that is about to expire to organizations that work on food recovery and/or food pantries. The city has seen great success with the DDPHE Food Matters program which does that at a smaller scale with food businesses as referenced above.

The City and County of Denver actively supports implementation of local food retail however, there is still room for improvement in terms of actively recruiting and retaining fresh and healthy food retail options, especially in under-served areas. Targeted efforts to streamline permitting processes, enhance infrastructure for better access, and provide support for innovative retail models are needed to expand support in this area. Additionally, initiatives aimed at promoting healthy food options in corner stores, convenience stores, and specialty stores require a new approach to improve implementation efforts given previous challenges in this area.

In terms of zoning, the existing zoning regulations may not fully address how complex food retail access and affordability is. Further analysis is needed to understand the extent of support or restriction the zoning code places on the Denver food retail landscape. Lastly, there is an overall lack of funding to support incentives for food retail. Currently, the primary sources of funding are housed in DEDO and are focused on small food businesses.

Food Retail Policy Recommendations

The following policy recommendations were developed from the findings within the food retail policy assessment and the areas of opportunities listed above:

Healthy Food Retail Support (Small Retail, Corner Stores, Convenience Stores, and Specialty Store)

- Develop effective ways to assist existing healthy food retail in under-served areas to stock and promote healthy food options. This could include providing technical assistance and marketing support to help corner stores source and sell fresh produce, whole grains, lean proteins, and other nutritious foods or look at ways to integrate improved food storage infrastructure.
- Implement policies in Neighborhood Plan Initiatives and the Denver Food Vision that offer financial incentives or tax credits to healthy small food retailers that open or expand in neighborhoods with limited food access.
 - Provide grants or low-interest loans to support the development of new healthy food retail establishments in neighborhoods with low food access.
- Streamline licensing/permitting process to incentivize and support existing healthy food retail establishments or new developments in targeted areas.
- Implement new and innovative zoning laws that require convenience stores to allocate a minimum percentage of their floor area to essential food categories, ensuring the availability of fresh and nutritious options.



Food Recovery Ordinance

- Propose a Food Recovery Ordinance mandating food establishments, such as grocery stores and restaurants, to implement food waste reduction and recovery systems to support local food access.
- Enforce a provision requiring a minimum percentage of surplus edible and non-expired food be donated to food pantries, shelters, and similar organizations aiding individuals and families facing food insecurity.



Designate Specific Areas in Denver to Improve Food Access

- Designate areas in Denver with limited access to healthy food options, to recommend new developments to include food retail options, neighborhood markets, or community gardens as part of their site plans.
- Offer incentives for increased development for retail or expedite the permitting for developments that incorporate food access services within designated areas.
- Restrict the development of new and small discount stores in low-food access areas to prevent over concentration and promote access to healthy food options.
- Amend/revise land use ordinances in areas with limited food access, restricting the placement of unhealthy food and beverages in new constructions and promoting the availability of healthy options.



Definition and Regulation of Farmers Markets in Zoning Code



- Establish a clear definition of farmers' markets within the zoning code to standardize the operation and expansions and implement a regulatory measure within the zoning code to regulate the operation of farmers' markets, ensuring compliance with health, safety, and land use standards.
- Define the criteria that must be met to qualify as a farmers' market, including requirements related to vendors, products sold, and operating practices.
- Provide guidance and oversight to farmers' market organizers and vendors to facilitate adherence to regulatory requirements and promote the integrity of farmers' markets across Denver.

Distribution and Procurement

Food distribution and procurement refers to the method of food aggregation, storage, processing, and distribution across the food system. Due to the comprehensive nature of the term, specific key terms were combined with other larger themes across the assessment. For example, the Colorado Cottage Food Act was originally under distribution and procurement due to the specific processing aspect of food for sale. However, within the context of the assessment, the Colorado Cottage Food Act is more closely aligned with food retail in terms of expanding usage and access to selling food produced within a residential setting.



The specific terms reviewed include:

- **Food Hub/Distribution/Aggregator:** There is no specific definition in Denver-based data sources on food hubs/distributors/aggregators, however the USDA describes them as the coordination of some aspect of the production, processing and/or marketing of food to meet consumer demand for local, fresh, organic, or other value-laden products.²⁰
- **Food Processor:** Similarly, Denver-based data sources do not directly define a food processor, however the USDA defines the following terms which are useful for the purposes of this assessment:

Processing means a commercial enterprise's use of a commercial facility to:

- (1) Convert donated foods into an end product;
- (2) Repackage donated foods; or
- (3) Use donated foods in the preparation of meals.

Processor means a commercial enterprise that processes donated foods at a commercial facility.

Policy Scores for Distribution and Procurement

Policy Score	Referenced in Comprehensive Plan 2040 / Blueprint Denver	Referenced in Localized Plan	Regulated Through Zoning	Being Implemented	Total Score
Food Hub/ Distribution/ Aggregator	No	Neighborhood Plan Initiative, Denver Food Vision	No	GFPP, ARPA, EXL	2
Food Processor	No	No	Yes, permitted uses under husbandry for plants	No	1

Figure 10. Policy Scores for Distribution and Procurement

This table shows policy scores for food hub/distribution/aggregator and food processors.

FOOD HUB/DISTRIBUTION/AGGREGATOR

Food hub/distribution/aggregator received a score of two. While the key terms were not referenced in the Comprehensive Plan 2040 or Blueprint Denver, there were several mentions with the neighborhood plans to streamline permitting processes for facilities aggregating, storing, processing, and distributing food. Likewise, the mentions in the neighborhood plans were in alignment with mentions in the Denver Food Vision, to *enhance food system infrastructure, such as aggregation and storage facilities, commercial kitchens, and public market spaces to enhance value added production*.⁴ Ultimately, integrated supports in food aggregation and distribution would *strengthen connections between Colorado farms, local distributors, and Denver-based food businesses and consumers* as referenced in the Denver Food Vision.⁴

Current implementation of these strategies is specific to the Good Food Purchasing Program (GFPP) led by DDPHE which prioritizes local food economies through resilient food supply chains and strengthening regional food production, processing, manufacturing, and distribution.¹⁹ In addition, DDPHE is also funding projects throughout the food system through the American Rescue Plan Act (ARPA) Food System Resiliency Grant (FSRG). The purpose of the grant is to provide food system infrastructure improvements through resiliency building and sustainability through multi-year grants.

FOOD PROCESSOR

Food processor received a score of one following the assessment. There was no mention of food processing within the Comprehensive Plan 2040, Blueprint Denver, neighborhood plans, and the Denver Food Vision. The singular mention of food processing was within the municipal code discussing lawful uses of food processing with a license to operate a food processing, wholesale, and warehouse establishment.¹⁴ In addition, there are no specific examples of implementation for food processing within the Denver food system that align with the purpose of this assessment.

Mapping how food moves from production or processing to purchasing involving manufacturers, wholesalers, and retailers presented a significant challenge in data collection. FIC did not have this type of data available to create maps for this report.

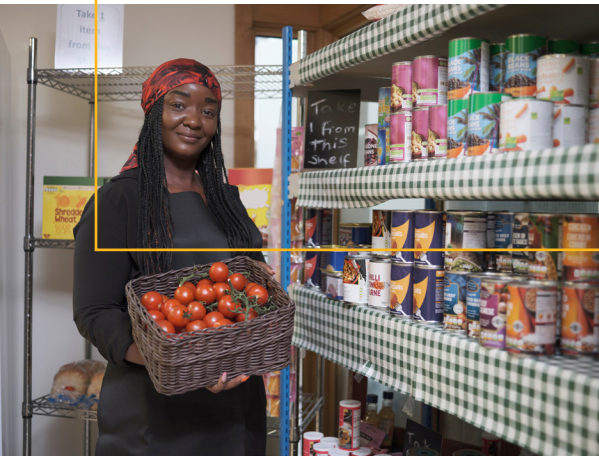
Areas of Opportunity within Distribution and Procurement

Certain aspects of distribution and procurement policy lack explicit references in both the Comprehensive Plan 2040 and Blueprint Denver, while others are mentioned in localized plans without regulatory enforcement. Implementation efforts for policies, particularly those related to food processing, are also lacking, limiting their potential impact. Opportunities for improvement include increasing support for implementation efforts and leveraging available funding opportunities.

Distribution and Procurement Policy Recommendations

The following policy recommendations were developed from the findings within the distribution and procurement policy assessment and the areas of opportunities listed above:

Zoning for Food Processing and Distribution Facilities



- Establish zoning regulations to designate areas for food processing and/or distribution facilities, minimizing potential impacts on nearby communities.
- Streamline the permitting process for food processing and distribution facilities to facilitate their establishment and expansion in appropriate locations.

Healthy Food Distribution Incentives

- Offer financial incentives or grants to food distributors and wholesalers that prioritize the distribution of healthy, fresh, and locally sourced foods to retailers and food pantries in under-served low food access areas.



Invest in Infrastructure for Food Distribution

- Invest in the development of food redistribution infrastructure, such as cold storage facilities, refrigerated trucks, and distribution hubs, to improve the efficiency and capacity of food recovery and redistribution efforts.

Food Access

Food access was difficult to assess using the four-point policy scale, because land use policy enforces physical spaces and types of uses rather than the effectiveness of food access programs and operations. Food access refers to the ability of individuals and communities to obtain and consume adequate, healthy, nutritious, locally sourced, and culturally appropriate foods to prevent food insecurity. Food access partners may include food pantries, food banks, and other mutual aid partners that include free or low-cost food as a part of their programming. Unlike land use policies, which regulate the physical space and use of land, food access related references were all focused on programs that support existing local food production sites and retail options within communities.



The Blueprint Denver and Comprehensive Plan 2040 makes specific mention of *ensuring access to affordable, nutritious, and culturally diverse foods in all neighborhoods through community-driven food resources* as an overarching goal for the City and County of Denver.^{1,2} This commitment is shown through specific references within the Denver Food Vision, Neighborhood Plan Initiatives, and the Game Plan for a Healthy City. The strategies seek to do outreach and education on healthy eating habits, cooking, and shopping practices while also encouraging home food production to meet the demand for nutritious options. Additionally, there were many references supporting community-led projects to address gaps in access; a focus on agencies collaborating closely with local organizations for improved services for residents; and increasing integration and public awareness of programs like SNAP and WIC in existing retail and local food production. There were also multiple references on supporting and expanding food pantry capacity.

Food access is an area where the city is actively implementing many programmatic supports, but policy supports are minimal. Because the COVID-19 pandemic highlighted several gaps in the local food system and subsequent inflation, there has been a heightened need to support education, outreach, and support for the existing food pantries in Denver. Most of recommendations are actively being implemented through initiatives led by DDPHE, including the HFDK initiative and the ARPA FSRG funding. These initiatives support resiliency and sustainability in local food systems. Ongoing efforts such as the monthly Denver Metro Food Pantry Network calls also led by DDPHE, are designed to provide ongoing support, education, and networking opportunities for pantries across the city.

Tailored neighborhood-specific technical assistance, and community-building initiatives done by the Food Matters Program, FIC, and other city agencies like CASR, DEDO, DPR, and OCA are also furthering the wrap-around support to food access through targeted neighborhood-level approaches. Though FIC has in the past supported food pantries especially during COVID-19, and though food pantries will always be necessary, this model is not a long-term solution to addressing the systemic issues which cause food insecurity. The nature of FIC's work has changed to upstream efforts to create a more connected food system where pantries are not the only resource for neighborhoods who suffer from low food access.

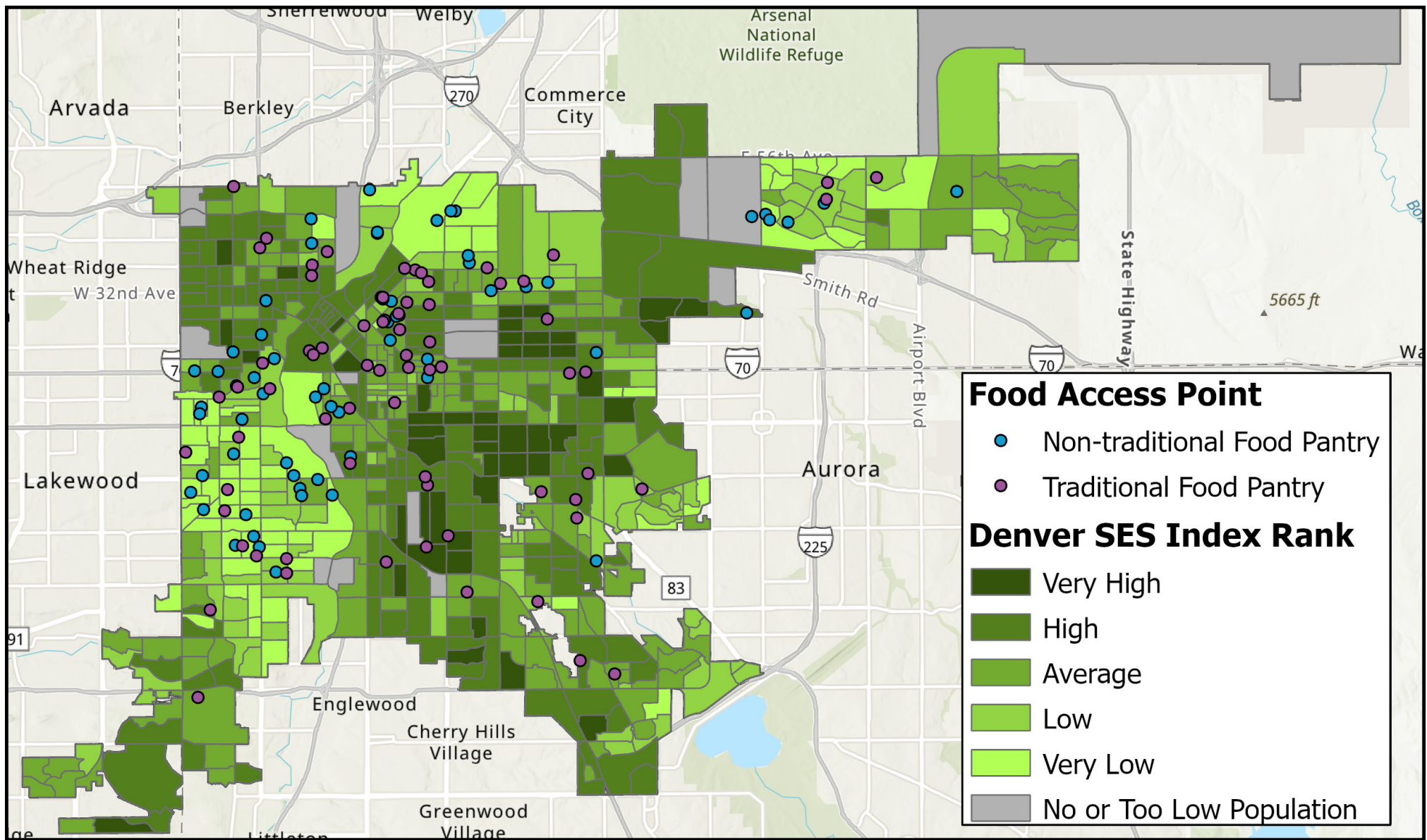


Figure 11. Food Pantries and the SES Index Rank

This map focuses on where no-cost food assistance i.e., food pantries are located and the correlation to the socioeconomic index. The blue dots represent non-traditional food pantries which operate outside a specific location and/or on an ad hoc basis, while the purple dots are traditional food pantries which do have a set location and distribute food on a regular basis. An analysis based on the socioeconomic index reveals that, apart from downtown, most food pantries are located outside the “inverted L” and exist predominantly in neighborhoods with very low socioeconomic rankings. This suggests that pantries are filling the gap to help meet food access needs in areas with lower economic access and without access to large grocery stores.

Areas of Opportunity Within Food Access

Gaps specific to food access is the lack of intentional mentions of food access partners including pantries and food banks in the Comprehensive Plan 2040 and the Blueprint Denver plan, indicating that this work may not be sustained over time because there is no explicit policy that could be connected to the community's stated need for programmatic and operational funding. Addressing this gap is essential to ensure the continued effectiveness and sustainability of food access support initiatives in Denver.

Another notable gap lies within financial policy. While the city has made significant strides by establishing dedicated positions and implementing time-bound funding opportunities across local food production, food retail, distribution, and procurement, a critical gap remains apparent in its financial policy. This assessment highlights the need for a long-term, sustainable funding source that comprehensively addresses all components of the food system. The success of ensuring access to food for everyone in Denver and the effective implementation of most policy recommendations rely on the availability funding.

Food Access Policy Recommendation

The following policy recommendation was developed from the findings within the food access policy assessment and the areas of opportunities listed above:



General Funding for Food Access/ Food Systems

- Food access related references all focused on programs that support existing local food production sites and retail options within communities and implementing programs and/or policy require a sustainable source of funding. Introduce an ordinance or tax-revenue source to fund many of the policy recommendations mentioned in this assessment and general food systems supports throughout Denver. Funding should examine gaps in both funding priorities and eligible organizations to follow more holistic approaches to food access.



Community Engagement for Policy Prioritization

One of the values of the FIC initiative is to strengthen partnerships for a community-led, sustainable, and just food system. To meet the FIC objectives and realize the FIC values, the FIC team engaged food systems collaborators in policy prioritization by hosting three community listening sessions. The FIC community, referred to as FIC's food systems collaborators, consists of community residents, community-based organizations, community coalitions, local food policy councils, and local government.

Listening Sessions Process

The FIC community engagement toolkit³⁰ served as a resource for engaging communities in the listening sessions to share the results of the assessment and gather feedback. The purpose of the listening sessions was to engage the community in prioritizing three policies from the 10 developed from recommendations resulting from the land use policy assessment and maps analysis. FIC collaborated with three community-led organizations to design, host, facilitate, and conduct outreach for the listening sessions. Each session averaged 42 participants and included live language interpretation, translated materials, meeting dietary needs by providing a meal, and childcare.



At the end of the listening sessions, participants were asked to participate in a post-session survey in which some participants expressed an appreciation for the learning opportunity in that *“It was great to learn about the current status of Denver and think through what is possible.”*

Notable feedback included the following key areas: The majority of the participants felt their viewpoints were respected (91% definitely true), understood their role in the prioritization process (85% definitely true), and found the process transparent (78% definitely true). Additionally, most participants clearly understood the issues and options (78% definitely true) and believed that the discussion addressed the most important aspects of the issues (75% definitely true). Of the remaining responses, most indicated that the statements were ‘somewhat true’, with only one respondent disagreeing with the statement that “the discussion addressed the most important aspects of the issues.”

Demographics of Participants Across All Three Listening Sessions

Characteristic	Count (Percentage)
Race (multiple choice)	
Total Participant Response: 55	
White	23 (43.3%)
Hispanic/Latinx	21 (39.6%)
Black/African American	3 (5.7%)
American Indian or Alaska Native	2 (3.8%)
Asian	1 (1.9%)
Age	
18-44 years	29 (60.4%)
45-64 years	17 (35.4%)
64 and older	2 (4.2%)
Gender	
Female	36 (73.5%)
Male	9 (18.4%)
Non-binary	3 (6.1%)
Other	1 (2.0%)
Preferred Language (Multiple Choice)	
English	37 (69.8%)
Spanish	13 (24.5%)

Figure 12. Demographics of Listening Sessions Participants

Listening Session Rankings



Figure 13. Listening Sessions Ranking based on 10 policies reviewed.

Community-led Policy Prioritization

Three key priorities emerged from the community-led prioritization at the listening sessions:

- Funding for Food Access/Food Systems,
- Neighborhood Urban Food Production, and
- Healthy Food Retail Support



The policy recommendations which were not top priorities are listed below:

- Food Recovery Ordinance
- Invest in Infrastructure for Local Food Distribution
- Incentives for Development Areas identified as Mixed Use
- Designate Specific Areas in Denver to Improve Food Access
- Food Processing and Distribution Infrastructure
- Sustainable Landscaping Practices
- Definition and Regulation of Farmers Markets in Zoning Code

The ‘Listening Sessions Ranking’ (Figure 13) above indicates how small groups ranked each of the 10 policy recommendations. The ranking of the policies was determined by the frequency of votes for each policy and the average rank score from each group. Participants shared that involving the community in this process was valuable, as stated by one participant *“I liked the data/maps and small group conversations and that we can advise experts who know how to draft and implement policy. My time felt respected and important.”*

In the policy recommendation for **Funding for Food Access/Food Systems**, the small group conversations centered around the importance of ensuring reliable funding for food access initiatives. Some participants voiced concern about having two food ballot tax initiatives, one being Healthy Food for Denver’s Kids, and if taxpayers would see the need to choose between the two initiatives. Other small group discussions revolved around the importance of focusing a new policy with funding on food access to be used on root causes of hunger which underscores food justice and sovereignty.

In the policy recommendation for **Neighborhood Urban Food Production** the participants indicated the focus on regulating urban agriculture and streamlining permitting processes would address some community needs. However, the policy does not address how the city can support the needs of urban farmers including access to land, fair wages for workers, and procurement strategies, which was highlighted by session participants as a potential gap.

The third policy prioritized **Healthy Food Retail Support**. Participants were asked to select a third policy as a buffer for potential challenges or opportunities in implementing the first two policies in the coming year. There was discussion among participants of strategies to promote access to healthy food options in various retail settings including small stores, corner stores, convenience stores and specialty stores. Participants emphasized the need to address infrastructure requirements for fresh food availability and suggested incorporating incentives to purchasing local produce. Additionally, the discussion explored the challenges of sourcing affordable healthy foods and the importance of supporting local economies while ensuring accessibility and cultural relevance of food options.

Session participants were encouraged to provide feedback, either during the small group discussion or post session surveys, on the policies being reviewed. Some of the feedback affirmed the policy aligned with community needs, and other feedback included adjustments to the recommended policies to address perceived gaps. FIC will continue to actively engage community in the action planning, advocacy, and implementation of these policies and incorporate adjustments where feasible. The feedback will support guiding technical assistance offered to community which may include educational opportunities on civic processes of policy implementation.

**Policy Recommendations
for Equitable Food Access
Across Denver**

Prioritizing community needs in policy development ensures that initiatives are tailored to address the realities faced by communities experiencing food insecurity. Engaging directly with communities allows policymakers to gain valuable insights into their unique needs and preferences, leading to the formulation of more effective and inclusive policy solutions. Through the analysis of the land use policy assessment and GIS mapping, and community feedback, FIC discovered reoccurring gaps and opportunities which could provide more effective and equitable City and County of Denver internal processes, programs, and policies. These opportunities and recommendations below will be explored throughout FIC work beginning in fiscal year 2025.

Standardized Use of Food Systems Definitions: Establish standardized language across city plans, policy, and regulations to improve clarity and consistency in policy implementation. This standardization will help streamline communication and ensure uniform understanding among stakeholders. This will also facilitate a better understanding and compliance among stakeholders for implementation.

Collaboration and Coordination: Continue to prioritize and facilitate increased collaboration among city agencies, community organizations, and farms, businesses to effectively implement initiatives aimed at promoting healthy and diverse food access options.

Standardized Evaluation Frameworks and Further Evaluation of Retail and Agriculture Work

- Create and put into practice standardized evaluation metrics and frameworks to improve accountability and effectiveness of food policy implementation. This approach will allow for continuous monitoring and assessment of initiatives, facilitating data-driven decision-making and performance improvement.
- Conduct a more detailed evaluation to better understand the current state of community gardens, urban farms, and food retail options.

Program vs. Policy: A notable finding is the importance of distinguishing between programmatic recommendations and land use policy within city plans. While many city-planning policies reference programming, it is essential to recognize that new programs cannot be legally enforced or maintained over time without formal requirements (unless through regulations such as municipal ordinances such as HFDK or CASR's Climate Protection Fund). However, the inclusion of program-related infrastructure in plans can create opportunities for future initiatives.

More Integration of Food Initiatives within Planning Policy: There is a need to incorporate more detail into the Comprehensive Plan 2040 and the Blueprint Denver plans in terms of agriculture, food pantries, food distribution, and food businesses that are not classified as larger grocery stores. This integration would provide a clear framework for allocating budgets to this work and better regulation to support initiatives outlined in neighborhood plans, facilitating coordination among implementing agencies and community initiatives. Additionally, there is a need for better integration with the city's green infrastructure plan, ensuring a direct link to food production. It is necessary to explicitly address food access within other departmental plans such as DEDO, CASR, HOST and DOTI with existing, but informal touch points with food access.

Standardizing the Use of Neighborhood Plan Initiatives: This assessment showed the city has a great process for informing and adopting Neighborhood Plan Initiatives which include extensive community feedback however, the implementation strategy and responsibilities can be unclear, or lack sustained financial resources and capacity at times. There is a need to standardize the use of Neighborhood Plan Initiatives as strategic planning guides for programs, allowing for city agencies to align initiatives with community needs and their own set priorities. Integrating the specific recommendations from Neighborhood Plan Initiatives into program development ensures more impactful outcomes, fosters accountability in community engagement, and promotes a cohesive approach to addressing food system challenges and opportunities.

Sustainable Funding Sources: To ensure that policies implemented effectively and sustainably, it is recommended to allocate funding in the Denver city budget, or to establish a new and long-term sustainable funding source to implement food system policies and programs. Funding would support all aspects of local food production, food distribution and procurement, and small retail support and food pantries. By having reliable designated funding that would be issued through grants, the city can continue building partnerships with organizations, businesses, and community groups to make food systems work more effectively and sustainably. Community input with city plans may introduce biases and oversimplifications. Different assessment approaches may yield conflicting results making it challenging to draw definitive conclusions about the effectiveness of a particular policy.



Limitations

The FIC assessment of land use policies focused on planning policies, regulatory policies, and financial policies across 16 local documents. However, the analysis focused primarily on city-based programs, budgets, and understanding of the implementation of the policies due to capacity, rather than broader examination of how the policies may be impacting individuals or specific communities. At the same time, the analysis focused on policy only and did not consider the many programs which impact food access but may not have the additional requirement of being included in formal policy. There are also other land use policies laws and documents that exist at the state of Colorado and federal level such as childhood nutrition policy, agricultural subsidies and water rights and others which impact the food landscape in Denver but are outside the scope of this project.

The use of GIS maps offers a method of spatial existing conditions analysis, but FIC encountered a few limitations with its use. First while zooming in on maps allows for granular detail, it also leads to difficulties in differentiating specific locations and conversely, zooming out sacrifices granular detail, making it challenging to obtain the level of specificity required for certain analyses. The quality of the maps during the community listening sessions led to distortions in the representation of geographical features and impacted the clarity and precision of the data presented. Denver relied on external partners to supply some data which posed challenges, as not all necessary data were available, accessible, or up to date such as walkability maps, transportation information, or city-owned parcels of land. This hindered the completeness and accuracy of the GIS map analyses. Future analyses and assessments could integrate these missing data sources to provide more accurate and comprehensive maps and data. Finally, mapping how food moves from production or processing to purchasing involving manufacturers, wholesalers, and retailers presented a significant challenge in data collection. FIC did not have this type of data available to create maps for this report. Finally, while small group facilitators were subject-matter experts, some lacked detailed knowledge of all mapped and presented information.

Listening sessions are an essential tool for FIC, fostering meaningful engagement, gathering key insights, and building relationships with the community. However, time constraints emerged as the one of the most significant limitations of the listening sessions which restricted the depth of discussion and prevented thorough exploration of all ten policies requiring prioritization. Limited time for discussion also hindered opportunities for direct community input and questions. Within the participant survey, when asked what could be improved for future, time constraints surfaced as a key theme as evidenced by these two comments, *“Too much talking- only 30 minutes for community discussion”* and *“Create more time for clarifying questions after presenting the policies because I felt that it was rushed through the content.”*

Finally, despite diverse audiences, attendee representation did not proportionally reflect Denver’s population demographics, as indicated by both visual observation and survey demographic data. With limited staff capacity, only three listening sessions were feasible, potentially limiting participant diversity. FIC intentionally worked with trusted community-led organizations to host the sessions to get widespread outreach to diverse audiences, and though diversity was represented in the attendees, some neighborhoods and identities were not present. One participant when asked what could be improved in future sessions noted, *“Sharing [the invitation] more widely so that more people can come to these meetings and offer more opinions.”* Notable from the survey data in Figure 12 is the limited or lack of representation by Black/African Americans, American Indian or Alaska Native individuals, Asian communities, individuals aged 64 years and older, as well as those identifying as non-binary or other genders. Additionally, there was a limitation in the representation of preferred languages other than English and Spanish. Lastly, specific outreach to some elements of the food system would have supported the insight gained from community. For example, there was a limited representation from individuals in the food retail space to help inform the policy prioritization which included food retail.

Though the land use policy assessment, mapping, and listening sessions all had some limitations experienced by FIC moving forward there will be efforts to minimize these limitations in further community engagements and future presentations on LUPA and mapping. This includes accessing a walkability map, transportation information, and city-owned land parcels to include in further assessments. Already higher quality maps have been used in this report thus replacing the screenshots used in the listening sessions which caused distortion. Finally, FIC will continue to put in place methods to engage more diverse audiences into future community engagement opportunities.



Conclusions and Next Steps

FIC sought to conduct a thorough assessment of the current food policy landscape in Denver to address food access challenges and root causes of food insecurity. Through LUPA and mapping analyses, FIC identified key areas for intervention in prioritizing policies to increase access to healthy foods.

Community engagement remains central to this process, with listening sessions aimed at gathering perspectives directly from community to inform policy decisions. The listening sessions resulted in productive discussions around key policy recommendations aimed at addressing food insecurity and promoting equitable access to nutritious foods in Denver through 1) Funding for Food Access/Food Systems 2) Neighborhood Urban Food Production 3) Healthy Food Retail Support. Advancing these policies will guide FIC's multifaceted approach to address food insecurity, and FIC will re-engage the community to assist in action planning for the policy development and implementation of these policies.

Finally, as FIC will use this analysis as policy guidance to create a more just and resilient food system for all in Denver, the land use policy assessment and maps data could be useful to strengthen advocacy efforts among other community-based food organizations and local and state policymakers with similar goals of advancing equitable food policies.



Key Terms and Acronyms

A list of additional key terms and acronyms was created to supplement the key terms already defined in the analysis above. This list not only ensures a shared understanding of meaning, but also allows for effective communication and understanding of this assessment and its findings.

Additional Key Terms

Accessory Use: an accessory use in zoning code refers to a secondary use of a property that is related to the primary use. For example, in a residential zone, an accessory use might be a garage, a shed, or a home office. In a commercial zone, it could be outdoor seating for a restaurant or parking spaces for customers.

Equitable: The fair treatment, access, opportunity, and advancement for all people, while at the same time identifying and eliminating structural barriers and systemic racism that have created inequity for communities of color, First Nations people, and historically marginalized groups.

Food Apartheid: Emphasis on the deliberate and systemic inequalities in food access, which are often rooted in historical injustices such as redlining, segregation and discriminatory economic policies.

Food Secure/Food Security: A household-level economic and social condition of access to adequate food. According to the USDA: “Food security means access by all people/household members at all times to enough food for an active, healthy life.” Food security includes at a minimum the ready availability of nutritionally adequate and safe foods.

Food System: A food system is the process of how food gets from a farm or ranch to an individual and their family. The food system begins with the land, water, seeds, and tools that farmers and ranchers convert into food. The food system also encompasses the cleaning, moving, processing, repacking, packaging, distributing, selling, and cooking that happens between the farm and the plate.

Mixed-Use Zoning: an area or zone designated for development that allows for a mix of different types of land uses within the same vicinity. These can include residential, commercial, and/or industrial uses. The purpose of mixed-use zoning is often to promote more efficient land use, encourage walkability, and create vibrant, diverse communities.

Sustainability: Sustainability refers to the ability to maintain or support various processes or conditions over the long term without depleting natural resources, harming the environment, or compromising the well-being of future generations. In the context of environmental sustainability, it emphasizes practices that promote the conservation of resources, the reduction of negative environmental impacts, and the development of systems that can endure and thrive over time.

GIS Key Terms Examples

Food Access: Grocery store, supermarket, small market, corner store, convenience store, food pantry/charitable food.

Food Retail Definitions:

Convenience stores: Corner stores with or without gas station and pharmacies/drug stores that sell food.

- *Examples: CVS, Walgreens, 7-Eleven*

Large Supermarkets and Other Grocery (except Convenience) including warehouse clubs and supercenters

- *Examples: King Soopers, Safeway, Walmart, Sam's Club, Costco, Sprouts, Whole foods, etc.*

Small Supermarkets and Other Grocery (except Convenience)

- *Examples: Trader Joe's, Natural Grocers, Lowes Mercado, large specialty store like Leavers Locavore*

Specialty Food Stores: meat markets, fruit and vegetable, and fish and seafood markets

- *Examples: Carnicerias, cultural/ethnic markets, butchers, neighborhood market*

Local Food Specific Retail:

Farmers Markets: A food market at which local farmers sell fruit and vegetables and often meat, cheese, and bakery products directly to consumers. Farmers markets are seasonal, i.e., held in the summer months when crops are abundant or during holidays, and often occur weekly or biweekly at the same location.

- *Examples: South Pearl Street Farmers Market*

Farm Stands: A place where farmers sell fresh local food, often using a small structure (temporary or permanent). Often the farm stand is on or near the farm on which products were grown.

Mobile Farmers Markets: A consolidated farmers market which can be transported in a van or other large vehicle to different neighborhoods to sell fresh local food. Often mobile farmers markets are seasonal, like farmers markets. The location of these markets can change often daily, and therefore each location is mapped as a food access point, with the caveat that this access is only periodically available, and on specific days.

- *Example: GoFarm Mobile Market*

No-Cost Food Assistance: A place where a food assistance program is open to the public (by appointment or not) where food is distributed at no cost (sometimes called a "food bank" by community members or organizations). Does not include the Food Bank of the Rockies distribution center/warehouse.

Traditional Food Pantries: A food pantry with a brick-and-mortar location which distributes food on a regular basis (daily, weekly, monthly). Typically distributed via in-store shopping and/or food boxes

- *Examples: Action Center, Metro Caring. Also includes churches and schools with regular distribution dates and times.*

Non-traditional Food Pantries: A place where a food assistance program occurs without a brick-and-mortar structure and/or on an ad hoc basis. Often targets a specific neighborhood or population and may not be open to the public.

- *Examples: Kaizen, Denver Food Rescue. Responsive, pop-up pantries at churches, parking lots etc.*

Food Production Points: Farm, ranch, or community garden

Farms/Ranches: An area of land and its buildings used for growing crops and/or rearing animals for sale or distribution.

- **Community gardens:** Col laborative projects on shared spaces where contributors share in the maintenance of a garden or garden plots and produce local food. Contributors often consume the food themselves or donate food. Community gardens may be open to the public or private.

Near: Refers to proximity or closeness to a specific location or point of interest.

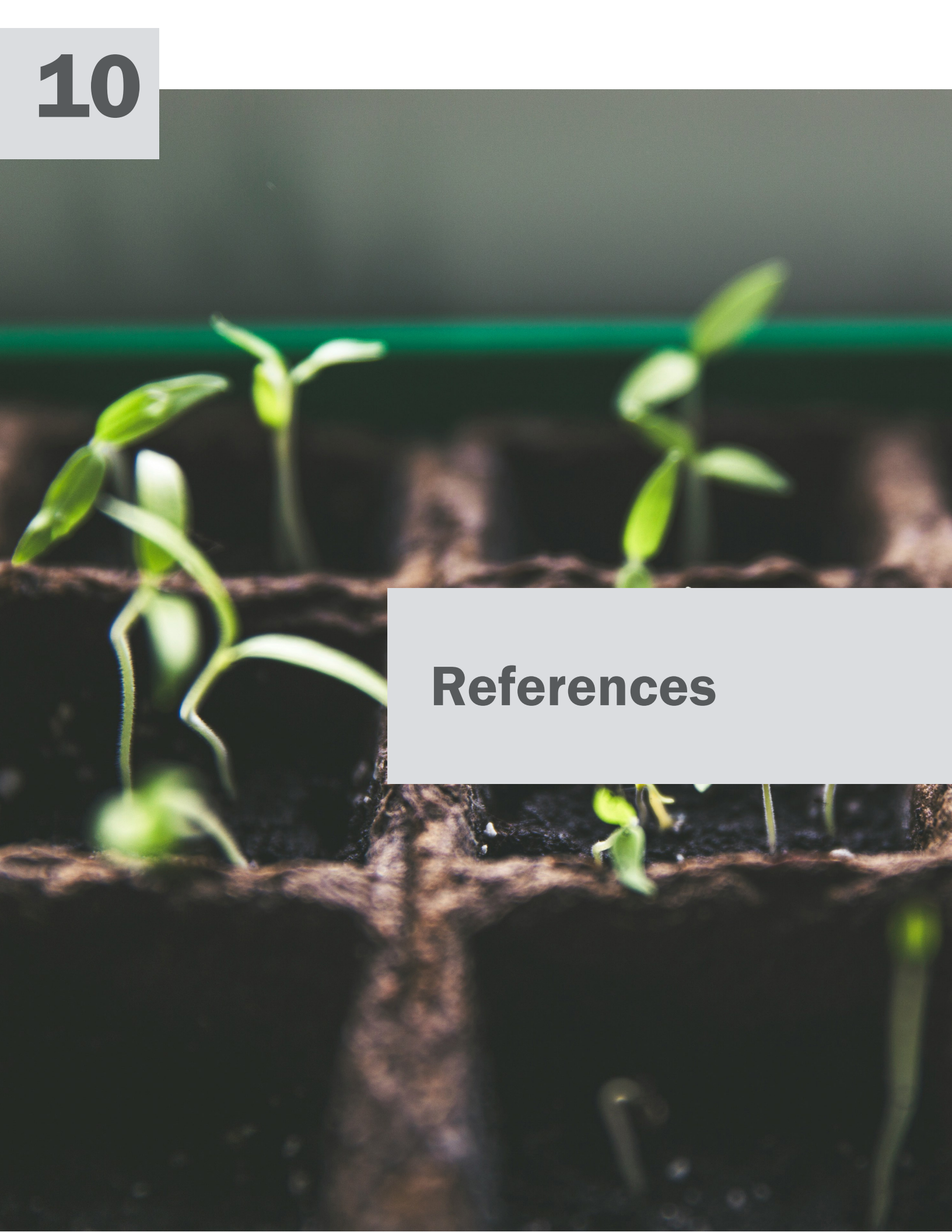
- Supermarket is located within a one-mile radius of a residential neighborhood, making it convenient for residents to access groceries.
- A bus stop is considered “near” if it is within walking distance, less than a quarter mile, from a residential area, allowing residents easy access to public transportation.
- Community garden located less than a quarter mile from a residential area.

Priorities: Denver FIC mapped food access points and production points. By analyzing current locations of these points and comparing demographic data, risk index, zoning, and accessibility, the visualization represents where there are unmet needs and untapped potential for food access and food production.

Unmet Need: The gap or deficiency in access to food resources or services within a given area. It indicates a demand for food-related resources which is not being adequately met by the existing infrastructure, lack of food retail outlets, production capacity, or other critical resources needed to meet the nutritional needs of a population in a specific area.

Definitions of Acronyms

- **ARPA** – American Rescue Plan Act
- **CASR** – Denver Office of Climate, Action, Sustainability & Resiliency
- **CPD** – Denver Community Planning and Development
- **DCFAC** – Denver Community Food Access Coalition
- **DDPHE** – Denver Department of Public Health & Environment
- **DEDO** – Denver Economic Development & Opportunity
- **DFV** – Denver Food Vision
- **DPR** – Denver Department of Parks & Recreation
- **DOTI** – Denver Department of Transportation & Infrastructure
- **EXL** – Denver Department of Excise and Licenses
- **FIC** – Food in Communities
- **FSRG** – Food System Resiliency Grant
- **GIS** – Geographic Information System
- **HBP** – Healthy Beverage Partnership
- **HOST** – Denver Department of Housing Stability
- **LUPA** – Land Use Policy Assessment
- **NPI** – Neighborhood Planning Initiative
- **OSEI** – Denver Office of Social Equity and Innovation
- **OCA** – Office of Children’s Affairs
- **SWFC** – Southwest Food Coalition
- **SFPC** – Denver Sustainable Food Policy Council
- **TA** – Technical Assistance
- **USDA** – United States Department of Agriculture

A close-up photograph of several small green seedlings with two leaves each, growing out of a dark brown, textured substrate in a tray. The background is blurred, showing a green horizontal line.

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A photograph of a sunflower field. In the foreground, a sunflower is in sharp focus, showing its bright yellow petals and dark brown seed head. Behind it, another sunflower is slightly out of focus. The background is a soft-focus field of more sunflowers under a pale, overcast sky. The overall tone is warm and natural.

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