

AUG 13 2004

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Friday, August 06, 2004

M^cGuire 1024

**Food Guide Pyramid Reassessment Team
USDA CNPP
3101 Park Center Dr., Room 1034
Alexandria, VA 22302**

Dear Sirs,

Please find enclosed a diagram and discussion, which is part of the Food Wheel Study at the Veterans Hospital in New Orleans La. and supports the need to change the pyramid to a food wheel.

Ryan M^cGuire

McGuire 2 of 4

New Pyramids

Evidence now indicates that not all fats are bad, and that energy dense carbohydrates (high glycemic load) promote poor glycemic control. Several efforts have been made to produce a revised Food Pyramid. The National Heart, Lung, and Blood Institute conducted two key studies: Dietary Approaches to Stop Hypertension (DASH) and DASH-Sodium studies. These studies used an eating plan that is low in saturated fat, cholesterol, dairy fat, salt, red meats, and sweets. The DASH Diet emphasized consumption of fruits and vegetables as low energy-dense foods to replace high energy-dense carbohydrates promoted by the USDA pyramid. Patients on the DASH diet showed lowered blood pressure and LDL cholesterol and homocystine.⁶³ In a similar vein, the Mayo Clinic proposed a new healthy eating pyramid to encourage weight loss. The Mayo Clinic Pyramid focuses on consumption of unlimited amount of vegetables and fruits in order to decrease energy intake and take the emphasis off counting calories. Mayo clinic pyramid places fruits and vegetables at its base and encourages consumption of heart-healthy monounsaturated fats.⁶⁴

Weight loss is a significant component of improving glycemic control. Very low calorie diets of 800cal can produce substantial weight loss and rapid improvements in glycemia, and lipemia in type 2 diabetic patients.^{65,66} Moderate amounts of weight loss improve metabolic abnormalities of insulin resistance and dyslipidemia and a reduction in mortality.^{67, 68}

Several studies, including the USDA published a white paper report, which reviewed the evidence-based studies that supported popular diets, concluded that energy restriction improves glycemic control and insulin resistance.^{70,71,72,73,74} It becomes apparent that the choice of a healthy eating plan for diabetic patients must also incorporate proper nutrition for hyperlipidemia and obesity.

More important is the concept of glycemic load. GL is positively associated with the risk of developing diabetes.^{56,46,75} Researchers at Harvard School of Public Health have developed an alternative to the USDA Food Pyramid, which emphasizes food with low glycemic load and heart healthy fats.⁷⁶ More than 50,000 men and 90,000 women were followed 10 to 15 years in the Health Professionals Follow-up Study and the Nurses' Health Study. Researchers found that men who followed the Harvard Healthy Eating Pyramid lowered overall risk of major chronic disease by 20%, and women lowered their overall risk by 11% as compared to the USDA pyramid.⁷⁷

McGuire 30F4

Food Wheel

Cumulatively, the data represents a significant paradigm shift from the USDA Food Pyramid model toward a Harvard Type Food Pyramid model. Dietary guidelines from American Heart Association now reflect these recommendations.⁷⁸ The Center for Nutrition Policy and Promotion of the USDA is tasked with revising American dietary guidelines by 2005. Adoption of a pyramid is a disservice to the health of Americans.

Several problems remain with a pyramid style presentation:

1. It is difficult to portray the difference between the qualities of foods in each food group in a triangle presentation.
2. Pyramid is too simplistic.
3. Since it is recognized that a balanced diet is optimal, the placement of foods at the base or apex may not be appropriate because there are foods in each group that need emphasis.
4. Patients need something pragmatic that can provide daily reference.

A new wheel presentation developed at the VAMC-NO by Ryan McGuire and Peter Holley is based on the Harvard Pyramid, and provides a quick reference for patients to determine preferable foods, foods that should be eaten in moderation, and foods that should be avoided within each group.

Food Wheel Rules

- Drink 8 glasses of water every day
- Daily exercise to your capacity
- Daily calorie consumption for weight maintenance is: body weight x 15
- Reduce daily calorie intake 500kcal to 1000kcal if BMI > 25
- Fresh fruits and vegetables any time
- Avoid salt
- Avoid carbohydrates with high glycemic load > 10 [avoid white, prefer whole grains]
- Starchy legumes (beans) in moderation
- Choose unsaturated or monounsaturated oils from vegetables [olive oil, canola oil].
- Choose low fat dairy foods and/or calcium supplements.
- ETOH in moderation – check with your MD
- Lean red meats sparingly
- Multivitamins for most

HEALTHY EATING FOOD WHEEL

CARBOHYDRATES

WHOLE GRAINS ONLY
USE SUGAR SUBSTITUTES

MULTIVITAMINS

ALCOHOL SPARING
BREAD

WHITE STARCHES

RICE
PASTA
POTATOES
CEREALS

COMPLEX STARCHES

COLOR OF

WHOLE MILK BUTTER
ICE CREAM

LOW FAT YOGURT,
CHEESE

DAIRY
OR USE CALCIUM SUPPLEMENT

POTATO
FRIED
VEGETABLES

VEGETABLE JUICES/NO ADDITIVES

VEGETABLES

Any time

ALL IN ABUNDANCE

WHOLE GRAINS

SKIM MILK
SOY NONFAT
YOGURT

8 GLASSES
WATER &
EXERCISE
DAILY

PLANT OIL
OLIVE,
CANOLA
FISH

NUTS: WALNUTS,
CASHEWS,
PEANUT BUTTER

FAT PLANT OIL DAILY

BUTTER, MARGARINE, SPREADS
LARD, MAYONNAISE, FATTY MEATS

ALL FRESH FRUITS

OR IN WATER
LIMIT 1 GLASS

TOFU, FISH
EGG WHITES

POULTRY
EGG
BEANS

LUNCHEON &
MEATS FRIE
RED MEAT

FRUIT JUICE
UNSWEETENED
IN SYRUP

FRUITS:
DRIED

CANDIED OR
SWEETENED
DRINKS

FAT MEATS
HOT DOGS

1=GO

2=THINK

3=STOP

FRUITS
2-3 TIMES/DAY

PROTEIN
0-2 TIMES/DAY

Ryan McGuire

McGuire
4-11-4

AUG 13 2004

August 11, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

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Braman 1 of 1

Simplicity is an important key to weight control. Everyday Americans are bombarded with advertisements from multiple food suppliers ranging from Fast Food Restaurants to Beef farmers to dietary supplements. We are overwhelmed with information to the point of frustration and despair.

My own philosophy regarding food is that there are three main groups. These groups are:

1. Whole foods that are natural to the earth
2. Man made/derived foods from natural sources
3. Unnatural Foods/Refined Sugars/Fats

Group 1: Whole Foods That Are Natural To The Earth:

This category consists of ALL whole fruits, vegetables, beans and grains that are natural products of the earth and should provide the bulk of our daily caloric needs. Water is also included in this group.

Group 2: Man Made/Derived Foods From Natural Sources

This category includes foods such as milk, cheese and other dairy products, meats, honey, breads, butter, some oils, peanut butter, pastas, whole grain cereals, crackers, tea, coffee, etc. All of the foods in this category are very close to their natural source/state and require a small amount of human manipulation to bring them to a consumable state. However, because they are not a natural, ready to eat product, some caution should be used.

Group 3: Unnatural Foods/Refined Sugars/Fats

For the most part, foods in this category should be avoided at all costs. This group includes nutritionally bankrupt, high fat/high sugar/high salt foods such as candy bars, potato chips, snack cakes, deep fat fried foods, sodas and other sugary beverages, high fat condiments, most snack machine foods, etc. as well as excessive amounts of oil and sugar.

By simplifying the foods groups and associating them with a familiar, everyday color code makes each group very easy to remember. Americans see a specific color code on a daily basis. This color code is seen while driving and even watching the weather. The simple yet highly effective colors of Green, Yellow and Red give direction and indicate severity to us every day. We are told to go on green use caution on yellow and stop on red. Good weather is indicated by green and rises in severity through yellow to red. We see these colors everyday.

By the same token, Group 1 foods get the green light while we should use reasonable caution with Group 2 and avoid Group 3 almost completely.

This is the system I use when eating. It is very easy to remember when cooking, eating out, grocery shopping, snacking, etc.

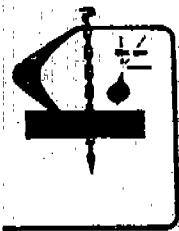
Thank you for allowing the public to voice their opinion. I hope my 2 cents worth will add to the reassessment process.

Sincerely,

Amy Braman

Amy Braman

Penrose NC



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AUG 13 2004

South Carolina Association of Family and Consumer Sciences

Bob Jones University

Greenville, SC
August 10, 2004

Turner 1 of 1

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Sirs:

In order to facilitate the usage of the pyramid in my classes, seminars, and in the high school textbooks that I have written, I flip the entire pyramid. The reason for going this? Most people have an idea of what the pyramid is, but there is no real understanding of its meaning nor is there any implementation. Look at the current pyramid and you will see that the vegetables are written to the left and the fruits to the right. I've found through quick survey in all my lectures that about 99.9% of the population will always think in reference of these two as "fruits and vegetables" and not "vegetables and fruit." I have found that if I place meats . . . milks, fruits . . . vegetables, and then grains (in this order), my students learn the numbers easier (for an adult . . . 2, 2, 2 to 4, 3 to 5, 6 or more). I teach them to say it with a beat (like a cheer) and they have no problem analyzing their choices DAILY when they eat. I suggest they mentally do the pyramid cheer especially at lunch and dinner to reconsider their choices. For instance, if they have not had enough milk . . . they should choose their skim milk over the plain water. If they have not had enough fruits, say good-bye to the pound cake and hello to the watermelon.

By the way, it also helps if we encourage the teenagers to get 4 servings of milk (preferably picturing the word "skim" on the milk carton) daily since they are in the growing mode and actually need more Ca in their diets. Besides, with all the activity and metabolism going on, they will be drinking lots of something . . . and water, milk, and juices are far better to teach than soda and sweetened drinks. They are building habits and bones for life. (Their daily cheer would be 2, 4, 2 to 4, 3 to 5, 6 or more!)

Another point to improve on would be to use pictures of more healthful items in the pyramid. Oats, nuts, legumes, whole grains, more fish, more chicken, more eggs should be visible rather than the heaping bowls of indistinguishable foods. Go with actual photos rather than nebulous sketches or drawings. Our population is used to a 3-D rendering rather than a 2-D one. In order to promote better choices, use sample words to underline the various groups (under the picture of the grains, small print of "oats, whole wheat, brown rice, cereals, whole-wheat pasta" could be printed in bold black letters which would actually form the bottom line of the pyramid).

Hope these ideas help. I have had great success with everyone I have taught this to. The Pyramid becomes personal and do-able rather than some unattainable symbol on a box.

Sincerely yours,

Anna Sumabat Turner
Bob Jones University
Family and Consumer Sciences
SCAFCS Foods, Nutrition, and Health Co-Chairman
SCAFCS Newsletter Editor
SCAFCS Vice President Programs



Grand Junction, CO
Grand Junction, CO

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
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Milbank 1 of 1

Per your information gathering request, please consider the following comments as you redesign the food pyramid to more accurately reflect the jointly developed HHS/USDA *seven guidelines for a healthful diet for American's 2 years or greater*.

- The pyramid is only part of the picture, and unfortunately the only part the general public will see. Your booklet gives the details that folks need to have a better understanding of the pyramid. Without taking the time, or if not presented with the entire booklet, people misinterpret the pyramid advice.
- For example, the first dietary guideline suggests we eat a variety of foods, this is not the message one gets when looking over the food pyramid. The food pyramid alone leads one to believe that white bread, bleached flour, cereals, pasta, and white rice are free-for-all!
- Another example is that this pyramid appears to be all about low fat, with less attention to increasing fibers and decreasing empty, simple carbohydrates (white breads, cereals and pastas).
- Other dietary guidelines not addressed in your pyramid are: "balancing food with physical activity to maintain or improve your weight," "choosing a diet moderate in salt and sodium" and "moderating alcohol." "Choose a diet with plenty of grain products..." is misrepresented because the current pyramid standing alone gives no reference to "vitamins, minerals fiber and complex carbohydrates" as the fifth guideline spells out.

Other comments:

- The "outline of what to eat each day" as represented by the food pyramid is too simplistic.
- Review the Harvard School *Healthy Eating Pyramid* for a better representation of the outline of the HHS/USDA *seven guidelines for a healthful diet for American's 2 years or greater*. While not perfect, it is an improvement on the current USDA food pyramid.

Thank you for considering these suggestions.

Karen Milbank

Karen Milbank, RN, BSN, MPH
Supervisor, Health Promotion Programs
Including Steps to a Healthier Colorado/Mesa County.

Yale University

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Film Studies Program
New Haven, Connecticut

AUG 13 2004

Campus address:

Telephone

Fax:

Celeste 1 of 1

August 9, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom it May Concern,

I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

I have been on long term steroids now twice due to brain cancer, and each time my metabolism changed, I put on 20 pounds, and had significant swelling in the cheeks. I tried every diet and was unable to resume my original weight or form. Induction and Atkins for about six weeks curing me of this affliction and allowed me to resume my previous form and life. I sincerely believe that the classic food pyramid is flawed and that a sensible modification of Atkins, where protein and fats are privileged over carbs is a good idea. I'm happy to see this strategy is taking national prominence lately. I hope it will influence national policy on dietary needs.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,



Dr. Reni Celeste
Yale University

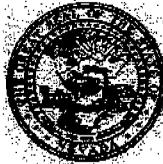
KEITH W RHEAULT
Superintendent of Public Instruction

GLORIA P. DOPF
Deputy Superintendent
Instructional, Research and Evaluative
Services

DOUGLAS C. THUNDER
Deputy Superintendent
Administrative and Fiscal Services

STATE OF NEVADA

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AUG 13 2004

SOUTHERN NEVADA OFFICE

Las Vegas, Nevada

Fax:

MOODY STREET OFFICE

Carson City, Nevada

DEPARTMENT OF EDUCATION

Carson City, Nevada

Fax:

August 10, 2004

Stewart / of /

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition
Policy and Promotion
3101 Park Center Drive Room 1034
Alexandria, VA 22302

RE: Food Guide Pyramid Revision

Gentlemen and Ladies:

IT is not the pyramid that needs to be revised.

A more effective education focus would be on standardization of restaurant and processed food serving size revisions to match the pyramid, i.e. a 4 oz bagel, although 1 serving to Sara Lee is really 4 servings on the pyramid.

Restaurant portions that provide three meals in disguise as "one meal" reinforce the overwhelming need of the American public to get more for less or something for nothing.

Sincerely,

A handwritten signature in cursive script that reads "Katherine Stewart".

Katherine Stewart, RD, CPFM
Office of Child Nutrition and School Health
Nutrition Education Program Consultant

Judith Cook

Swanton, Ohio
August 9, 2004

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy & Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern

I want to share my experience with the food pyramid. My father and brother have diabetes and have used diet and an oral medication. My father is deceased and my brother has done fair with control of his diabetes. I have been overweight most of my life and at age 60 know I am at risk of developing this disease. So I have controlled my carbohydrates and increased my activity slightly and am pleased at the result. I find it very easy to eat out and so satisfying that I will be able to live this way the rest of my life. More importantly my brother who followed the guidelines of the American Diabetes Association and used the food pyramid with fair results, has started to control his carbohydrates. His blood sugars have gone from the 120s to the low 90s and have been stable for so long now that his endocrinologist may take him off his medication.

Our families are very supportive and have eaten the same as we have. They have lost an average of 10 to 20 pounds. We all feel better. I have found that my cravings for sweets has diminished greatly since I have started counting carbohydrates.

I have been following this for almost two years and feel good and my lipid profile has improved. I am glad there is going to be changes made in the food pyramid and hope you will consider my comments.

Sincerely
Judith Cook

Judith Cook

AUG 13 2004

August 11, 2004

Karen Hughett

Butler, OH

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern:

My name is Karen Hughett and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

Since following the Atkins approach to limiting my carbohydrate intake, I have lost 20 lbs. and have went off my Prilosec for GERD and my Asthma inhalers. I do not get heartburn anymore either. Once in a while I may eat bread and other starchy foods and when I do, I get the bloating feeling back in my stomach. I feel much better while restricting the carbs. I think the Atkins lifestyle is the way most people should be following. I strongly urge overweight people or people with diabetes to follow the Atkins lifestyle. I'm sure if the Food Pyramid were modified, the percentage of overweight/obese people would drop dramatically and so would all their health problems.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

Karen Hughett

Karen Hughett

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Hughett 10/1

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Wolf lost

Jessica Wolf

Dubuque, IA

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern,

My name is Jessica Wolf and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

Before I tried Adkins I tried the low fat diets, high carbohydrate diets, and counting calories, all of which failed to control my weight. I started my low carbohydrate lifestyle after I completed college and I'm glad I did. Since I started, I have lost weight, gained tons of energy, and have confidence that I've never had before. Adkins is no longer a diet; it's a way of life. Everyone in my family is on a low carbohydrate diet and they all feel that same effects. I have downloaded Adkins Food Guide Pyramid, printed it off, and have handed it out to as many people I could. Everyone who's tried or thought of going on a low-carbohydrate diet thought it was a great food pyramid.

My comments are as follows: Increasingly Americans are over weight every year; they've followed the Food Guide Pyramid, as I did in the past, and had no success. With the new Food Guide Pyramid, this will change.

Please consider these comments as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

Jessica Wolf

Jessica Wolf

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AUG 13 2004

PATTI MARXSEN

Salem, Ma

Marxsen lost

August 11, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom it May Concern,

My name is Patti Marxsen and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to lose over 35 pounds over the past year and regain control of my health and my weight.

Between the age of 46 and 50, I gained about 25 pounds. I believe the cause of this was a slowing metabolism due to the beginning of menopause, and an unhealthy relationship with a man who could eat anything. Once I ended the relationship, my goal was to a) stop gaining and b) start losing. I tried low-fat regimes, Weight Watcher's, drank lots of water, increased exercise. When I really worked at it, I'd lose 5-7 pounds. Then it would creep back.

In September 2003, a friend told me about her great success with a low-carb diet. I read about the Atkins approach and figured I might as well try it. This relatively simple way of eating has changed my relationship with food, my looks, and my life. The news reports I hear that critique the low-carb lifestyle often distort the goal: It is not NO carb, but LOW carb. The Atkins program is not a license to eat fat, but an invitation to find the right balance of carbs, fats, protein, and other nutrients.

I KNOW the old pyramid is too heavily weighted toward unhealthy carbohydrates. With 127 million people overweight (according to the American Obesity Association) and an epidemic of obesity among children and youth, the USDA has a great opportunity to reconfigure what it means to eat in a healthy way. Reducing carbohydrates and getting away from America's addiction to sugar are important public health recommendations that should be made now and visualized with a better Food Guide Pyramid.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

Patti M. Marxsen

