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August 18, 2004

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

To Whom It May Concern,

This is in response to the Notice in the Federal Register issued on Tuesday, July 13, 2004, Opportunity for Public Comment on the FOOD GUIDE PYRAMID.

This letter specifically refers to and contains a Proposal for Food Guidance System for Graphic Presentation and Educational Materials.

Please find the enclosed Graphic Proposal "Guide to Balanced Eating For a Healthy Lifestyle" as a Motivational/Awareness Graphic and Slogan.

**Description:** The graphic utilizes the traditional Pyramid Graphic but displays it as six individual Pyramids in a circular pattern. Each Pyramid shape represents each of the existing food groups/sub groups found in the current Food Guide Pyramid. The positioning of each Pyramid in a circular fashion represents the sun, radiating balanced food and nutritional choices. A figure in a pose of a running person, exercising in the rays of the sun (the Pyramids), balancing the first part of the slogan above the figures head: "Guide to Balanced Eating" while the second part of the slogan is under him as if being created by the figures running motion: "For a Healthy Lifestyle". The purpose of the graphic is to convey the idea of a healthy community eating balanced meals from the different food groups/subgroups radiating from a natural environment, as a part of the overall healthy lifestyle that also includes exercise. The Graphic can be utilized either as a black & white graphic or with color, each pyramid or food group represented by a different color. I have enclosed examples of each for review/consideration. The graphic capitalizes on the public familiarity of the Pyramid, and expands on that. The number of pyramids can be changed in the graphic in order to represent more or varied food groups, educational materials, or different healthy eating patterns that may be identified by the Center for Nutrition Policy and Promotion and the Department of Health and Human Services.

I thank you for the opportunity to present this Graphic and Slogan to you for your consideration

Sincerely,

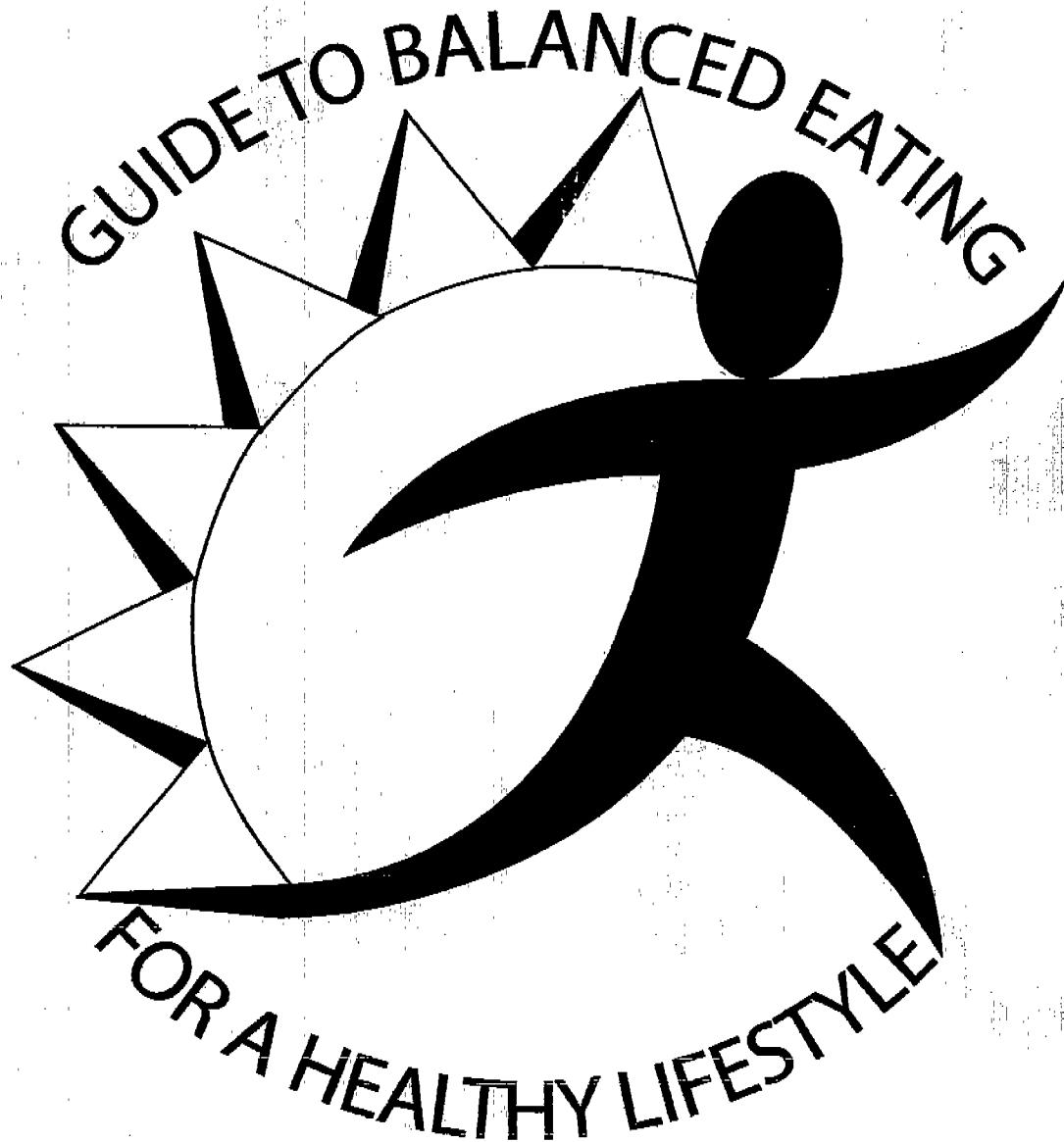


Ian A. Hanks

Westbrook, Maine

email:

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SR

Melinda Barlow

Vernal, Utah

Barlow/10/1

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 Meinda Barlow 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.

I started controlling carbs two years ago, my life has changed for the better in so many ways, I have lost 45 pounds and I have more energy and am living a more active lifestyle.

My health has improved, I had a scope done on my knee about six months before going on the controlled carbohydrate life style. My Dr. told me if I lost weight I would have better luck with my recovery.

Darn, He was right! I did not want to believe that changing my eating habits would make such a difference.

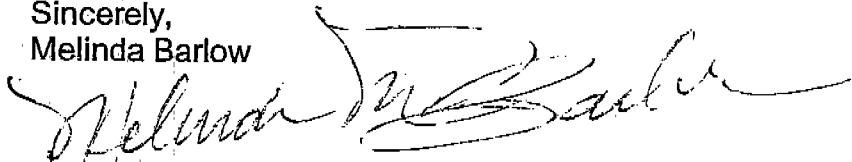
I had tried several different low fat, low calorie, plans with very little success. Then I tried controlling my carbs, the weight started to come off like magic, and without the hungry feeling I had with other plans I tried.

My comments are as follows:

- 1-Controlling Carbohydrates makes a difference in weight control.
- 2- Understanding what carbohydrates do when you eat them helped me understand why I could lose weight when controlling them.
- 3- We as Americans eat far too many Carbohydrates and that is why we are overweight.

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

Sincerely,  
Melinda Barlow



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McGuire 1 of 4

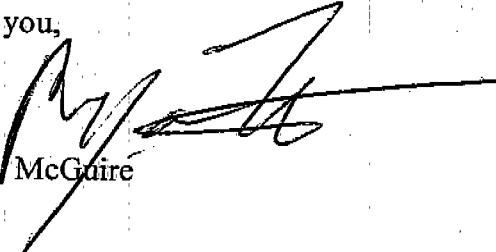
To: Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

From: Ryan J McGuire FP, CCE  
Veterans Medical Center  
New Orleans, La

Dear Sirs,  
Please find my comment for the revision of the food pyramid, which is part of Diabetes

Study we are now conducting.

Thank you,



Ryan J. McGuire

M = Guire / 2004

## 2.5 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.<sup>63</sup> 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.<sup>64</sup>

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.<sup>65,66</sup> Moderate amounts of weight loss improve metabolic abnormalities of insulin resistance and dyslipidemia and a reduction in mortality.<sup>67,68</sup>

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.<sup>70,71,72,73,74</sup> 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.<sup>56,46,75</sup> 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.<sup>76</sup> 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.<sup>77</sup>

(M = Guire) Box 4

## 2.6 Food Wheel

Cumulatively, the data represents a significant paradigm shift from the USDA Food Pyramid model toward a Harvard Food Pyramid model. Dietary guidelines from American Heart Association now reflect these recommendations.<sup>78</sup> The Center for Nutrition Policy and Promotion of the USDA is tasked with revising American dietary guidelines by 2005.<sup>79</sup>

However, 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 for food choices.

A new wheel presentation developed at the VAMC-NO [Fig 7] by Ryan McGuire and Peter Holley is based on evidence such as 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.

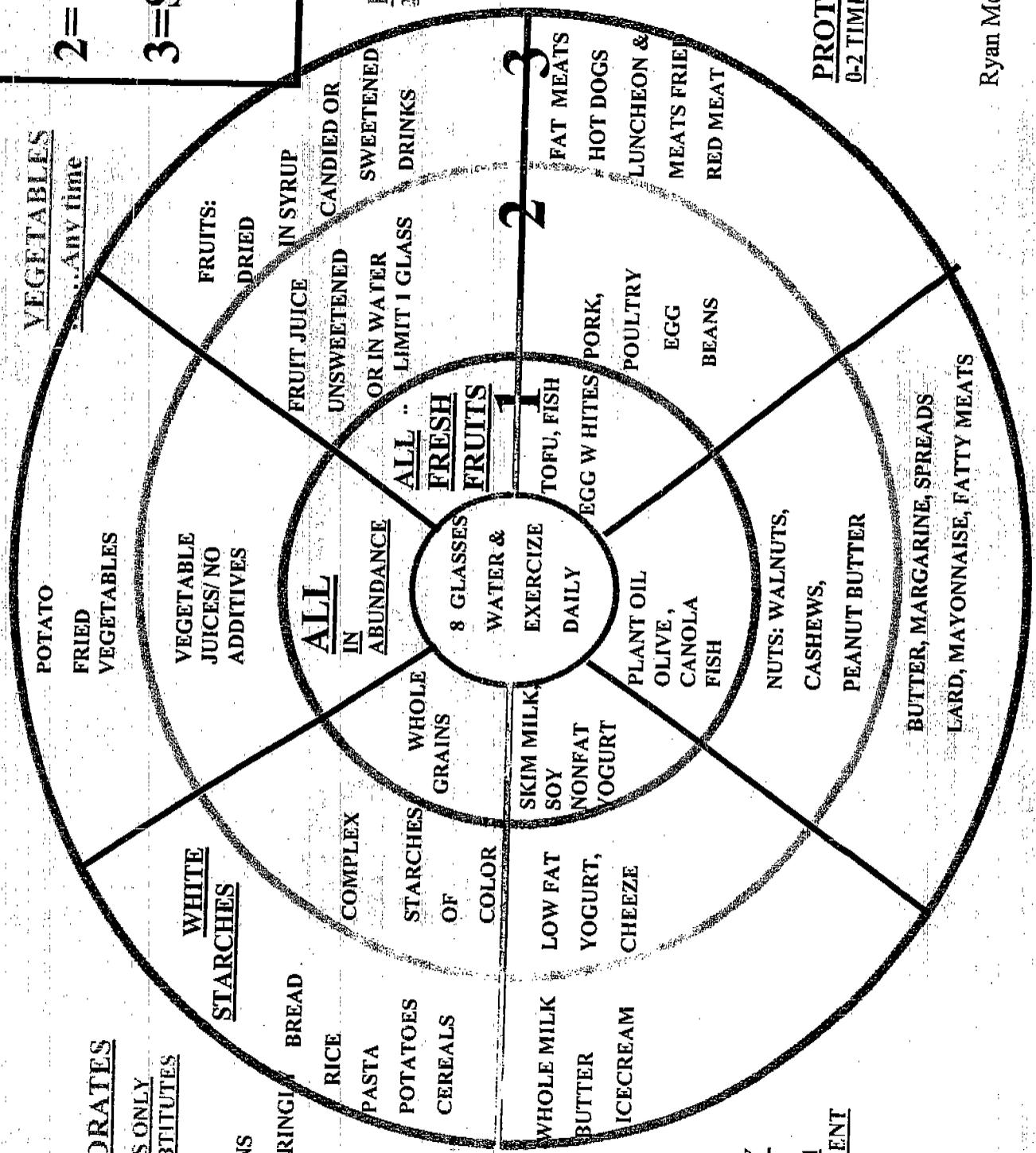
### Food Wheel Rules

- 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

*Mrs Guire 4 of 4*

**1=GO**  
**2=LIMIT**  
**3=STOP**



CARBOHYDRATES  
 WHOLE GRAINS ONLY  
 USE SUGAR SUBSTITUTES

MULTIVITAMINS  
 ALCOHOL SPAIRING BREAD

DAIRY  
 OR USE  
 CALCIUM  
 SUPPLEMENT

Ryan McGuire

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August 19, 2004

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

Dear Pyramid Reassessment Team:

Enclosed is my suggestion to redesign the nutrition pyramid concept. I believe the (nutrition) tree motif provides a fresh perspective and expands the possibilities of including additional dietary information in an artistic mode. The tree is a living entity (as opposed to a lifeless pyramid) that best describes the theory of good nutrition for a healthy life style.

The (tree) trunk supports the tree's limbs and provides a substantial base where basic nutrition theory begins, i.e., exercising, drinking water, and monitoring food portion size for all the (food) categories.

The specific food groups described on the different branch levels give a basic and fundamental understanding of the foods that can be consumed in larger or smaller quantities. Basic nutrition described within the context of a living organism, (a tree), I believe, makes the concept of good nutrition easy to understand and remember.

Included with my "nutrition tree" is a slogan:

Through the seasons  
For all good reasons  
Eat right  
Day and night ---

Sincerely,



E. Ann Hecht

Garrett Park, MD

avocado, fish, oil

Small amount of

meats

Milk, cheese, yogurt

2-3 servings

fruits

Hecht 3oz 3  
2-4 servings

whole grains

2-4 servings

Nutrition  
free

Exercise Daily

Drink Water

Monitor Portion Size  
for all food groups

Consume less fat, sugar,  
and salt

Hecht 3oz 3

E. Ann Hecht 08/19/04

Small amount

Nutrition  
Free

Exercise Daily

Drink Water

Monitor Portion Size  
for all food groups

Consume low fat, sugar,  
and salt

Hecht 3x3

meat, fish, poultry, eggs

2-3 servings

1/2

vegetables

3-5 servings

Bread, cereals, rice

6-11 servings

Throughout the seasons  
for all good reasons  
Eat right  
Day and night —

AUG 20 2004

From: Susan W Mullis

Monroe NC

(home ph)

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Mullis 10/1

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 Susan Mullis 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.

I am not considered obese -- yet, but am about 25-30 pounds overweight. My husband, who farms and works as a maintenance electrician, is obese. All of these pounds have come as age and metabolic changes have happened over the last 10 years. We live on a farm, and are relatively active.

We tried Atkins, and followed it religiously, losing a considerable amount of weight a few years ago. However, we could not stick to the rigid diet. So we modified the Atkins diet, to include complex carbs (beans, sweet potatoes, coarse ground wheat products, oatmeal). Frankly, the "diet" we are on is what my parents and grandparents ate on the farm -- heavy on meats, eggs, vegetables, and unsweetened fruits. When I need to trim pounds, I cut out some of the complex carbs.

My comments are as follows: I believe that the food pyramid needs to be rethought to differentiate between sugars, processed foods, and more natural foods. Let's face it. Strawberries, au natural, are a wonderful food; but strawberries covered in white sugar, slathered in cool whip, and sitting on a big slab of sponge cake sticks to the hips and arteries!! Clear instruction in the food pyramid, differentiating between types of carbs, plus a reversal of how much protein you need has to be the healthy way to eat. Children especially need the protein to add muscle and grow properly.

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

Sincerely,

AUG 20 2004

August 18, 2004

Reference: Food Pyramid Guide

USDA  
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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Torres / OKF

To Whom It May Concern:

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

I worked for the WIC Program for 10 years during which I taught nutrition to pregnant women and children. I learned about the Basic Four Food Groups and I incorporated it into my family's meals. During this time, I became more health conscious and I took up aerobics and walking to maintain my weight at 142. When the Food Pyramid replaced the Basic Four, I also followed it religiously. By then I was no longer working in WIC, but I continued to follow the low fat Food Pyramid and believed carbohydrates were what gave me energy and kept me exercising. By 2000, I was weighing 158 and no matter how much I exercised, I could not lose any weight! I received nutrition counseling in an effort to get back on track and again, the Food Pyramid was promoted. I ate my six to eight servings of carbohydrates, continued with aerobics, and even took up jogging in an effort to jump-start my weight loss. I continued to gain weight and ballooned up to 174 in 2001. My BMI was 29. I cut back more on fat and measured my portions, and jogged up to 2 miles four to six times a week, but still followed the Food Pyramid. I lost 4 pounds in six months! I was so disappointed! By chance, I read about a woman's weight loss following the Atkins diet. Mind you, this went against everything I knew about nutrition, yet the low fat, high carb approach was just not working, so I started the Atkins diet in June 2003. Success! I have lost nearly thirty pounds! I weigh 144 and I am so happy! My BMI dropped 5 points to 24! I have continued to exercise and I have never felt or looked better. I also had a physical and my blood tests came back perfect. My doctor praised me for keeping my cholesterol at such healthy levels. I eat plenty of salads, fruits, and vegetables and never feel deprived. Please reconsider revamping the Food Pyramid Guide. I feel that you will be doing a great disservice if you continue promoting the current guide. It is wrong, wrong, wrong!

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

Sincerely,



Rosa Torres

LAREDO, TX