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TUFTS UNIVERSITY

Lichtenstein
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THE GERALD J. AND
DOROTHY R. FRIEDMAN
SCHOOL OF NUTRITION
SCIENCE AND POLICY

*Stanley N. Gershoff Professor of
Nutrition Science and Policy*

July 30, 2004

Mr. Eric J. Hentges
Executive Director
USDA Center for Nutrition Policy and Promotion
3101 Park center Drive
Room 1034
Alexandria, VA 22302

Dear Mr. Hentges:

These comments are submitted in response to Federal Register 2004; vol. 69: no. 133, page 42030. Food Guidance System for Graphic Presentation and Educational Materials. They are organized consistent with VI. Topics of particular Interest to CNPP for Comment.

A. Advantages and disadvantages of retaining current shape for graphic and other potential shapes to use as a representative of the overall Food Guidance System.

Although the current Food Guide Pyramid has achieved a high level of recognition, as noted in the Federal Register, it has not been successful in communicating the intended message. In some cases, it may have had the unanticipated consequence of resulting in the miscommunication of messages. In addition, because the current serving sizes as defined by the Food Guide Pyramid are different than the serving sizes as defined by the Food and Drug Administration for the Nutrition Facts Panel, it has actually caused confusion. At this point, if a modified version of the current Food Guide Pyramid were to be retained it would be difficult to correct misconceptions and redefine serving sizes. In addition, there are an untold number of "knock-off" versions of the Food Pyramid and it might be difficult for the USDA to reclaim one for use as a logo for the Food Guidance System.

I encourage serious consideration be given to adopting a new simplified icon for the following reasons;

- Will be difficult to redefine the messages and approach with regard to food choices, with emphasis on balancing energy intake with energy expenditure, without radically changing the icon that is a highly recognized symbol of the original material.
- A new icon will likely attract more attention because by nature of its being different, it will stand out, and the USDA can capitalize on this boost to promote the new Food Guidance System.

I would suggest a new icon, perhaps a *Food Guide Plate* (circle), segmented into wedges symbolizing the relative contribution of the major food groups to an overall dietary intake. A plate (circle) is associated with eating, hence, would automatically be consistent with the concept of this icon representing a food based plan.

- The wedges could be color coded in a way that was consistent with the natural color of food groups (i.e. dairy-white, fruit-orange, vegetables-green, grains-tan, meat-red).
- This standard icon could then be modified, in conjunction with the educational material to be developed, to easily depict more individualized guidance. For example, were it enlarged or shrunk, it could clearly depict different energy levels.
- Were a *Food Guide Plate* to be adopted it would be relatively easy for manufacturers to partner with the USDA to use it on various packages and in advertising.
- Educational material could be developed around the *Food Guide Plate*, depicting concepts associated with the *Food Intake Patterns* and *Food Guidance System*. Such material should be available to teachers, specific for different grade levels, and tailored to math, science and health curricula. This would be an excellent way of raising awareness of nutrition early and often within the educational system. Optimally, the basic concepts would eventually be integrated into mandatory standardized tests.

Whatever the icon chosen, I strongly support the concept of using a simple version more as a logo than an educational tool. As has been learned from the Food Guide Pyramid, it is virtually impossible to convey nutrition guidance with a single icon. Although in the case of the Food Guide Pyramid the icon was tied to supplemental nutrition messages, the two pieces quickly became disassociated and the pyramid was often left to stand by itself. As such, some of the intended concepts were lost or misinterpreted.

I would also strongly support *de novo* testing of a wide range of icons, independent of what the original testing found. Times have changed, as likely have what people associate with food and nutrition.

B. Usefulness of the proposed strategies to highlight both motivational/awareness and educational messages.

Any graphic and slogan that can remind people of the importance of taking nutrition into account in their purchasing and eating decisions would be beneficial. This would likely achieve the goal of reaching the widest possible audience. Having educational material tied to the graphic and slogan for those motivated to learn more would provide additional benefit.

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Educational messages will need to be developed within the context of different food preferences and nutrient needs. Use of a slogan and simple graphic that can be embellished in conjunction with appropriate modifications will likely support the effort as a whole.

C. Advantages and disadvantages of the plan to individualize guidance in contrast to "generalized" messages.

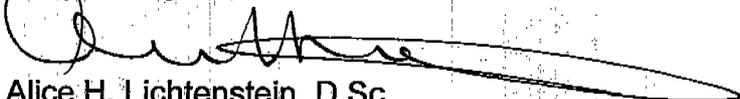
As noted in the Federal Register document, clearly, with respect to nutrition guidance, one size does not fit all. However, the usefulness of more specific guidance is dependent on individuals taking the initiative to seek it out and use it. Hence, an approach of providing general information that reaches as broad a audience as possible and individualized guidance for those motivated to use it would appear to be the preferable approach.

The individualized guidance material would also be useful for general educational purposes when concepts such as having to adapt ones eating patterns to different life stages or physiological states are addressed.

D. Advantages and disadvantages of the planned focus on core messages in contrast to use of a graphic to represent the educational messages.

I fully support the use of core messages to communicate the basic nutrition information. As indicated in the response to issue "A", trying to use a single graphic to communicate complex messages runs the risk of not getting the message across and potentially miscommunicating important concepts. By creating a logo those individuals motivated to seek out additional information will be able to do so.

Respectfully submitted,



Alice H. Lichtenstein, D.Sc.
Gershoff Professor of Nutrition Science and Policy
Director and Senior Scientist, Cardiovascular Nutrition Laboratory

July 30, 2004

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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 would like to offer some points to be considered by the Pyramid Reassessment Team. I have spent many years struggling with weight problems and have, since 1998, devoted most of my time educating myself about how various foods affect my body in order to finally gain control of my weight. I'm offering what I've learned in order to give you a perspective of how your recommendations may affect the health of American citizens as well as citizens of other countries who pattern their dietary recommendations after what the U.S. does, for decades to come.

1. If you are leaning toward just recommending calorie control, that is a big mistake. A calorie is NOT just a calorie, especially for people who are overweight (as the majority of Americans now are) and have become insulin resistant. One hundred calories of carbs, regardless of whether or not they are complex or simple, will work very differently in the body than one hundred calories of protein or fat. It is basic biochemical fact and the problem is most nutritionists were never educated in biochemistry, so they simply keep repeating the same myths they learned back when McGovern's committee, without scientific studies to support their recommendations, decided to base dietary recommendations on calories rather than how various foods work in the body. They thought it would be easier to control weight by telling people to reduce calories and since fat had more than twice the calories per gram than carbs and protein, fat was targeted for reduction. Taking that another level, meat was targeted since it had a lot of fat in it and so carbs won out (probably due to lobbying of agriculture as well) as the nutrient people should make the largest part of their diets.

There have been recent studies that proved that people who limited carbs were able to eat more calories per day than people on low fat plans. I am living proof of that. I used to be able to only lose weight if I cut my calories to below 700 per day due to insulin resistance. Low calorie and low fat plans contributed to my problems, even though I religiously followed the plans. Once I began low carb, I began to lose and my health improved due to dramatic improvement in my cholesterol, blood pressure and disappearance of acid reflux. It is also a myth that lowcarbers eat no vegetables, or eat mostly greasy meat. We eat adequate amounts of protein and eat the best vegetables and berries. We just don't eat the high carb versions of vegetables and fruits nor the grains (which we don't need anyway to be

healthy). I eat more than 1400 calories of good meats, fish, poultry, dark and leafy green and yellow vegetables and berries and still lose weight (now having lost over 110 lbs). I am not hungry and my medical tests are excellent. All this without any exercise at all so far (though I plan to add it when I get closer to goal) because low carb with adequate protein retains muscle mass. It has been proven in studies that low calorie and low fat diets decrease muscle mass with weight loss while low carb with adequate protein retains it. Why recommend an eating plan that has negative effects on muscle mass and also increases triglycerides as well as decreases HDL? Low carb increases HDL and lowers triglycerides dramatically. This seems a no brainer to me.

2. People who do not have weight problems can certainly eat whole grains in addition to good meats, fish, poultry, eggs, dairy, and more fruits than people who have weight problems due to insulin resistance. In a perfect world where the majority of the population didn't have serious weight problems it would be fine to keep telling people to eat a lot of grains, corn, potatoes, and pasta. But, the majority of the population is seriously overweight and need to cut down on high carb foods. If you recommend just cutting back on calories, they will continue to eat those calories in those high carb foods and risk losing the essential fatty acids that can only be found in meat and fat. They will increase their insulin resistance and also end up in starvation mode because they aren't getting enough food or nutrients.

3. The current nutrition label allows for food companies to round down their numbers as well as allows them a 20% margin of error. This needs to be changed. We need to know exact numbers for fat, protein, calories and carbohydrates with no fudging of the numbers allowed. For example, lowcarbers and diabetics need to know exact numbers of carbs, not rounded down numbers to zero or numbers that may be actually 20% higher than the label shows. Diabetics need to plan their insulin doses and lowcarbers need to know exactly how many carbs they are eating, especially since insulin resistance is the same as being pre-diabetic and we are trying to avoid it.

If a food's carb content has been rounded down, say to zero per serving, and a person only eats one serving, that's fine. But, people see the zero count and then assume it is a free food (which I believe is really the intent of the food producers) and then may eat many servings of it per day. There is no such thing as zero carbs or calories in any food or drink except water. The USDA recently allowed coffee producers to use zero carbs on their nutrition labels. Prior to that, coffee had carbs, now it suddenly doesn't? The problem resulting from that is people then assumed that coffee was a free food in any quantity and began drinking a lot more of it and then couldn't understand why they stopped losing weight. It's the same with artificial sweeteners, which, if you are preparing a recipe that calls for a higher quantity of the sweetener, will have a much greater carb and calorie count due to the increase in volume of the sweetener. Here again, people are misled into

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believing it is zero carbs regardless of quantity because the nutrition label does not reflect the true amount of the carbs, and this is critical for lowcarbers who need to keep their carb levels low. This same problem occurs with calories per serving as well as the fat and protein content. If you truly want people to improve their health by eating a better diet, then the best thing you can do is recommend the nutrition labels reflect the real counts rather than rounded numbers and stop allowing food producers to be 20% incorrect.

4. As far as a graphic showing what people should eat and the amounts: you should have more than one. We need a graphic for people who do not have weight problems. We need a graphic for people who are overweight at different levels. Some have only around twenty pounds to lose and should cut back on refined foods and that should be enough to help them lower their weight. Others who are morbidly obese need a graphic that puts refined carbs, grains, corn, potatoes, pasta, sugar at the lowest amount with green vegetables, protein, dairy, fat at higher levels. There is no one size fits all graphic that you should develop because people just don't all fit into that category. If you try to tell overweight people to eat the same as people who have no weight problems and just eat less, that will not help them, because it's the way the carbs work in the body that causes the insulin problems and you have to get the insulin under control before weight loss can occur.

PLEASE look into the studies presented at the Kingsbrook Conference recently by scientists doing work in the field of obesity and metabolism before you make a final decision. It is much more important to do what is right for the health of Americans than it is to listen to the food lobbyists whose only concern is their bottom lines. If you put Americans first, the food producers will have to find ways to make their products more "whole" and less refined because there are ingredients they can use to do that right now. Resistant starches, sweeteners that have less effect on blood sugar and insulin, etc., are available now and being used in low carb products and some lowcarbers are even buying these ingredients to make their own recipes. These ingredients cost more now, and that is why the food producers want to continue to use the cheaper, more refined ingredients like High Fructose Corn Syrup, etc., which has been proved to be one of the worst ingredients that was developed to add to products to improve the taste after fat had been removed, because it has a very bad affect on blood glucose and causes a spike in insulin. But, if they have to accept recommendations of a food guide for eating less high carb bread, corn, potatoes, pasta, they will produce lower carb bread, corn, potatoes (a new lower carb potato is now just year away from being put on the market), pasta (low carb pasta is already available) and they can make just as much money from those products and recoup whatever they believe they will lose from the change. Many of the current high carb vegetables were bred to increase the sugar content, which has made our health worse and helped addict people to high carb foods. If food growers were encouraged to return to the heirloom versions of these

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vegetables it would be very beneficial to the health of Americans!

Let's face it, food companies aren't going to do the right thing unless they have to. Please don't succumb to the pressure food companies are putting on you now. If you do, we will still be in the same bad health situation ten years from now as we are today and your committee's decisions will be blamed for it.

I have attached a couple studies which debunks the traditional myths associated with low carb. I would be grateful if you would take a few minutes to go over this information before your decision is made.

Regards,
Susan Hardage

Burnet, TX

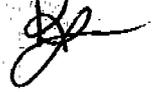
Irene J. McNeil

AUG - 4 2004

Wynnewood, PA

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July 31, 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 Irene J. McNeil and I'm writing to share my thoughts on the USDA Food Guide Pyramid.

My comments are based on my experience controlling carbohydrates in my diet which have helped me stay healthy and control my weight.

Since 1965, thus since nearly 40 years, I have benefited from eating a moderately low carbohydrate diet. The knowledge of carbohydrates and how they can affect my health and weight has steered me away from processed, sugar-laden, and starchy foods.

Throughout these 40 years, it has always distressed me to watch the USDA promote a food pyramid that is large on processed starchy foods and narrow on unprocessed proteins and oils. This surely cannot be based on science as it simply seems logical we should be eating the way our bodies were meant to eat and digest such as on what is available in nature, not what is processed through manufacturing.

It is appalling that the USDA continues to encourage eating habits that are prone to increase disease and weight. Also, that the usual USDA Food Guide Pyramid is the basis for teaching young people white flour should be a top priority in their diet.

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



Irene J. McNeil

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AUG - 4 2004

NORTH SYRACUSE CENTRAL SCHOOLS
FOOD SERVICE OFFICE

NORTH SYRACUSE, N.Y.

FAX #

Louise D'Angelo
Director of Food Service

Wayne D. Bleau
Assistant Superintendent for Management

July 30, 2004

Dear Department of Agriculture,

I would like to comment about the food pyramid and the nutritional guidelines. I am a school lunch director and I have worked with Syracuse City and North Syracuse Central School Districts and their menu nutritional analysis for a decade. I was part of the USDA pilot plan in 1995 to mandate that school lunches be at least 1/3 third of the student's RDA standards. I have worked for the past 9 years finding ways to decrease the fat in our recipes and menus and our students are eating healthier foods until this year. This year the USDA mandated that we must meet standards perfectly by February 1, 2004. Up to this point I met all my student's requirements for iron, calcium, Vitamin A, Vitamin C, and protein. The only problem I had was not giving them enough calories. My students were taking an entree, milk and two to three side dishes (fruit, vegetable, and dessert).

This year I have had to:

- replace low-fat dressings with regular
- Take off some government fruit and vegetables and replace them with a dessert
- Change our 5 inch bread stick to a 8 inch bread stick
- Give regular bananas instead of petite
- Start coating Toasted Cheese Sandwiches with margarine instead of spraying them with a no fat food spray

I feel these changes are harmful to my students. They do not need the added calories or fat. The government is making me contribute to the obesity problem.

Please consider decreasing the nutritional standards for calories. Grades K-3 should only be required to have 520 calories at lunch (1560 for the day). Grades 4-12 should only be required to have 600 calories at lunch (1800 for the day). Grades 7 - 12 should only be required to have 700 calories at lunch (2100 for the day). I feel today's students eat too much. The guidelines should set more reasonable standards for the country and for the school lunch program. Thank you for your consideration in this matter.

Sincerely,

Louise D'Angelo
Director of Food Service

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Andrews / 107-2

AUG - 4 2004

[Signature]

Harbor City, CA
August 1, 2004

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

Dear Sirs:

The basic food pyramid shape should be continued, because of its widespread acceptance and usage. The base however should be changed from breads, cereals, rice, and pasta to FRUITS and VEGETABLES with suggested servings of 10 to 12 per day. Fruits and vegetables should be the most important part of any diet.

The second layer of the pyramid should be relabeled CARBOHYDRATES, with a reduction in the recommended number of servings from 4 to 8 per day.

The third layer should be renamed PROTEIN, since meat is not the only source for this important health component.

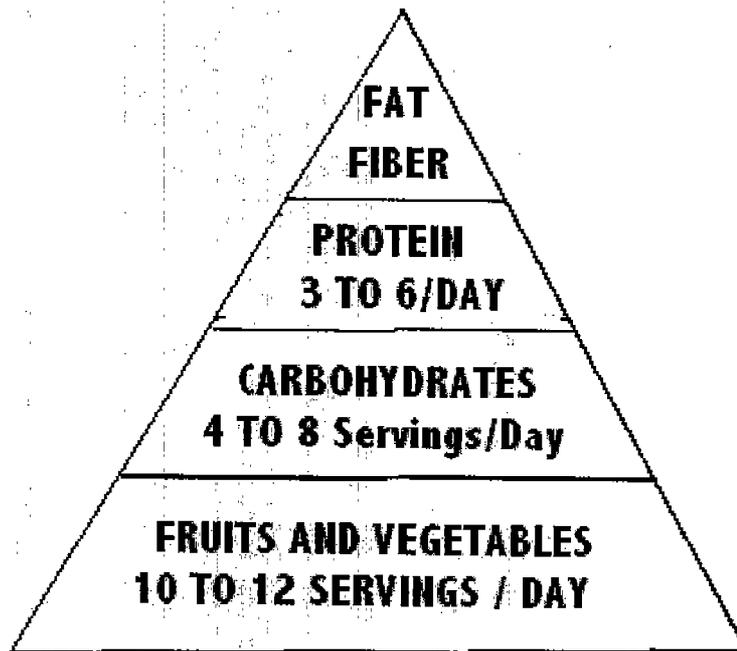
The fourth layer FAT & FIBER at the top of the pyramid is like icing on the cake. To ignore it and leave it off is tempting, since most people eat more than their fair share, but for those who follow guidelines strictly, fat cannot be ignored as a necessary ingredient in a healthy and balanced diet.

The basic pyramid shape should be retained, because it is simple and easy to understand. Emphasizing the importance of fresh FRUIT and VEGETABLES at the base should lead to a positive change in the health of our citizens. How many servings of fruit or vegetables have you had today?

Sincerely,

David E. Andrews
David E. Andrews

Andrews 20F2



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Jaime Ruiz

Miami, FL,

August 1, 2004

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

Dear USDA Administrator:

Please find below my respectful recommendations for your future Food Pyramid:

1st Bottom Section (Water, Protein, Fiber): Drink lots of water, Soy (soy beans, soy nuts, whole soy flour, tofu), Beans (red, kidney, pinto, black), Wheat Bran and high fiber whole grains, Omega-3 Fish (wild Atlantic salmon, mackerel, herring, sardines).

2nd Section (Exercise & Caloric Reduction to 21-22 BMI): Walk 3-5 miles minimum daily or equivalent, do Resistance exercise 2-3 times weekly, Balance exercises twice weekly or Tai-Chi; very slowly adapt to Fasting 2-3 days/week by delaying more and more your first daily meal.

3rd Section (Vegetables & Fruits): Spinach-Broccoli-Kale (with some Canola Oil), Tomato Sauce, low-sodium Tomato Juice, Onions, Scallions, Garlic, Blue/Blackberries, Strawberries, Apples, Apricots, Plums, Deep Red Concord Grapes, Oranges, Tangerines,

4th Section (Nuts, Teas, Spices): Nuts (Walnuts, Almonds, Brazil Nuts, Peanuts, Peanut Butter non-hydrogenated), Green and Black decaffeinated Teas; Cinnamon, Cilantro, Parsley, Curcumin.

5th Top Section (Oils, Supplements): Canola oil (Grape seed, Olive or Flaxseed oils as second best), Butters with plant sterols and omega-3; Multi-Vitamin, Calcium w/Vit. D, Vitamins C & E, Selenium, Flavones, 2 grams Fish Oil daily; *do NOT smoke, take drugs, or drink alcohol.*

Goal #1 Health: To promote sustained wellness by recommending *only the very best* foods proven by present scientific knowledge. These recommendations should remain dynamic work-in-progress as scientific knowledge improves.

Goal #2 Longevity: To reach the lowest morbidity and mortality rates (suggested by scientific knowledge) by including moderate exercise and slow caloric reduction (weight loss and maintenance) to a 21-22 BMI. Exercise and weight control cannot be separated from food suggestions.

Please ignore political considerations. Only recognize proven scientific knowledge. These suggestions are supported by science, and are specific, optimal, and simple to understand. If average compliance attains 75% plus, huge health and economic benefits would come to the American public, all employers, Medicare, Medicaid, and the U.S.A. budget.

Thank you very much for your attention to my humble suggestions.

Sincerely,

Jaime Ruiz

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JG

STEPHANIE JOAN GOLDMAN

Cincinnati, Ohio

August 2, 2004

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

Dear Food Guide Pyramid Reassessment Team,

I am writing regarding the USDA plans to revise the Food Pyramid. I am a member of the Weston A. Price Foundation. As you may be aware, we support traditional nutrition and agriculture. Like many Americans on the "American" diet, I suffered from health problems and weight problems for most of my life. This changed when I joined Weston Price and went on a traditional diet, I lost 75 pounds and most of my chronic health problems disappeared.

I did not menstruate normally for 20 years. Once I began eating organic dairy products and avoided all rBGH in my diet, I started getting my period every 28 days. I also experienced an immediate (within 72 hours) alleviation of chronic respiratory and allergy problems. With the exception of my allergy to cigarette smoke, all of my allergies are gone. How can the USDA have the position that these additives that taint 99 percent of our food supply are not destroying our health, and the future of our children?

The vision of the Food Pyramid that I hold is that it should be entirely of nutrient dense foods. The problem with the current foundation of the Pyramid being grains and cereals is that most of the grain products on the market are processed to the point of having no nutritional value at all. Our diet cannot rest on bread and pasta. It needs, at its heart to be comprised of meats, seafood, dairy and dark green vegetables. White flour and sugar have no place in our diets at all. Despite the pressure which I am sure the USDA feels from the corporate world, I urge you to take a stand with the new Pyramid and encourage the American people to return, with their children, to a traditional, unprocessed and organic diet.

When the Pyramid is revised, the first priority of the USDA needs to be a public education campaign the counteract the fat and cholesterol hysteria which as been so damaging to American health. Cholesterol is an important part of child development, and vital for adults' health. It is processed cholesterol and trans-fats, which have an altered molecular shape, that are dangerous.

Organic fat and cholesterol are not harmful at all. While losing weight, I ate nothing but meat, dairy and green vegetables for a year. My dietary calories were 50% fat (half of that saturated fats). After a year, I have a physical. At the age of 35, getting half my calories from fat, and half of those saturated, my blood pressure was 102 over 60, my kidney function was perfect,

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and my blood cholesterol was textbook perfect. By selling a story that organic fats will hurt you, you have done the American people and our family farmers a great disservice.

I urge the USDA to take a stand on the food sold in schools, and USDA standards for what is acceptable in our schools needs to be seriously changed. Fast food, soda and snack machines are not acceptable and need to be removed.

We do not need the fast food manufacturers making government policy. The USDA should encourage healthful habits among our country's citizens. Whole, unprocessed natural foods are what we have always been meant to eat.

Sincerely,


Stephanie Joan Goldman

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Blackburn

1021

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 concerned:

18 July, 2004

Facing another heart attack after having undergone two prior by-pass surgeries, I found myself in cardiac-rehabilitation once more. One year later, in much better shape, but still carrying the same weight as when I entered, despite being on a low fat and high exercise program, I paused to look at the others in the same program. Few if any had lost any weight and they [like I] had really followed the low-fat guidelines for over a year.

I decided to try the Atkins low carbohydrate diet.

Wow! Six months later I was 42 lbs lighter. Now eight years later I am still at that weight. I have gone off the strict Atkins diet over the years and have been on his maintenance plan, but without really watching what I eat. I was never hungry, in fact found many new and wonderful tastes along the way.

I believe this diet has put me on the track towards a healthier, more enjoyable (gastonomically, at least) life. I also know from this experience that the low-fat diet guidelines produces fatter, less healthy people. I do not feel the Government (any Government, but especially one dedicated to individual freedom) should set up guidelines of any sort. But if they do, they should at least be healthy ones, and it seems the last guidelines have led to a less healthy America.

Yours

Allan W. Blackburn

Greenwood, SC

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Michael Applebaum, MD

AUG - 4 2004

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Chicago, IL

Tel:
Fax:

Monday, August 02, 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:

As an alternative to the Food Guide Pyramid, I suggest simple "progressive" graphics. First, a graphic with caloric distribution (optional values are demonstrated). Second, graphics with macronutrients broken out. Third, a cooking method graphic.

My favored image is that of a totem pole. Unlike the pyramid, there can be no question that the totem pole is read top down. Representative images are presented below.

In addition, and I realize that this is beyond the scope of the Food Guide, I suggest labeling foods with total calories in the package. If it is difficult for some people to figure out a portion size, at least eyeballing $\frac{1}{2}$ or $\frac{1}{4}$ of the package to guesstimate calories can act as a fallback.

I also recommend the posting of a chart to act as a guideline for caloric intake. A formula based on height and a BMI of 23 could work for most people. Assuming a low lean factor multiplier, this chart would serve to assist those interested in losing weight. Through simple adjustment, it could also help those who want to maintain or add to their weight. The fundamental purpose of such a chart is to act as a starting point. I have included two representative charts for adults.

Thank you.

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Michael Applebaum, MD

Applebaum 2016

Totems

Calorie Distribution

CARBOHYDRATE (50%)

PROTEIN (40%)

FAT
(10%)

Carbohydrate

High-Fiber Vegetables

Beans, Legumes

Fruits

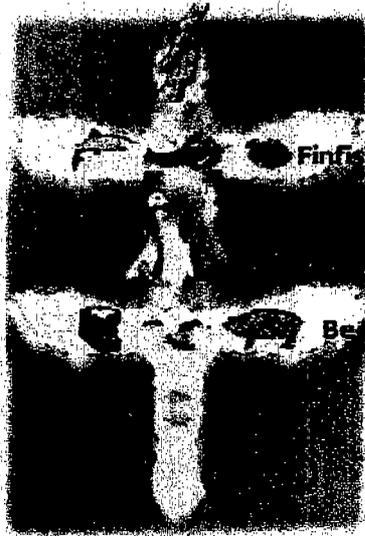
Whole Grains

Starchy Vegetables

Sugars, Processed Foods

Applebaum 3076

Protein



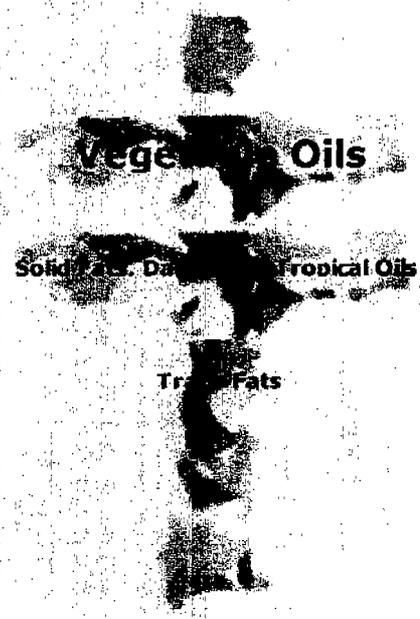
Finfish, Shellfish, Seafood

Turkey, Chicken
(skinless breast)

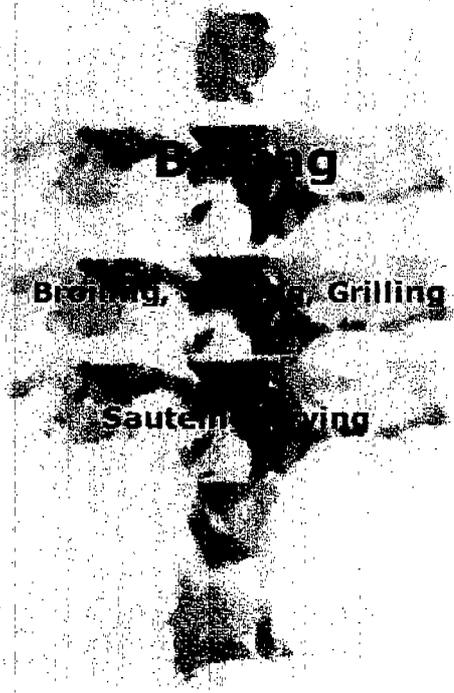
Beef, Lamb, Pork

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Fat



Cooking Methods



Applebaum 5 OF 6

TOTAL DAILY CALORIES

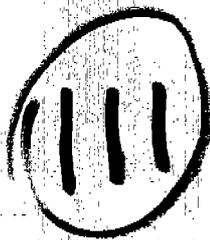
Your Height in Inches	Total Daily Calories You Should Eat (Men)	Total Daily Calories You Should Eat (Women)
54	1636	1472
55	1697	1527
56	1759	1583
57	1822	1640
58	1887	1698
59	1953	1757
60	2019	1817
61	2087	1879
62	2156	1941
63	2226	2004
64	2298	2068
65	2370	2133
66	2443	2199
67	2518	2266
68	2594	2334
69	2671	2404
70	2749	2474
71	2828	2545
72	2908	2617
73	2989	2690
74	3072	2765

Applebaum 6076

**TOTAL DAILY CALORIES -- Daily Moderate Exercise
for 30 Minutes**

Your Height in Inches	Total Daily Calories You Should Eat (Men)	Total Daily Calories You Should Eat (Women)
54	1869	1682
55	1939	1745
56	2010	1809
57	2083	1875
58	2157	1941
59	2232	2008
60	2308	2077
61	2385	2147
62	2464	2218
63	2544	2290
64	2626	2363
65	2709	2438
66	2793	2513
67	2878	2590
68	2964	2668
69	3052	2747
70	3141	2827
71	3232	2908
72	3323	2991
73	3416	3075
74	3511	3159

Greenville, NC
August 1, 2004



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AUG 4 2004

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

Dear Sirs/Madams:

I was pleased to read in our local newspaper of the development of a new food guide pyramid. I was especially delighted that you were inviting comments from the public because I have always had a problem with the number of servings suggested for each category.

You see, I am 77 years young, weigh 104 pounds, exercise regularly (weights and cardiovascular machine), and pride myself on eating "right." Now, if I ate the number of servings that are listed on the current pyramid, I would waddle! And, not "the least of these, my brethren," I would feel awful AND I'd hate the way I looked! I like wearing a size 4 or 6 petite.

So, I know everybody's size, shape, and age can't be accommodated, but if we can put a man on the moon (!), it must be possible to take into consideration one or more of these factors in whatever is printed with, on, or near the new pyramid.

I would appreciate very much your taking this suggestion under consideration. Good luck with the whole project.

Sincerely,

Mary W. Vars
OPAL (Older Person, Active Lifestyle)