

Copies of Public Comments Received During 45-Day Comment Period



**California Department of Education
1430 N Street
Sacramento, CA 95814-5901**

September 2019

From: Joy Pratt
To: REGCOMMENTS
Subject: Re: 45-DAY NOTICE OF MODIFICATIONS TO TEXT OF PROPOSED REGULATIONS REGARDING NUTRITION GUIDELINES FOR SCHOOL BREAKFAST AND LUNCH
Date: Friday, March 15, 2019 12:33:39 PM

Make them healthy and nutritious. Fresh foods and low in sugars and processed food.

On Sat, Mar 16, 2019 at 8:05 AM REGCOMMENTS <REGCOMMENTS@cde.ca.gov> wrote:

Pursuant to the requirements of Government Code section 11346.1(a)(2), the State Board of Education (SBE) is providing notice of the proposed regulations with regards to the above-titled regulation action. The proposed regulatory action can be found at <https://www.cde.ca.gov/re/lr/rr/childnutritionprograms.asp>.

Proposed California Nutrition Guidelines Comments

April 3, 2019

RE: Edits made by State Board of Education on regulation text originally noticed on September 21, 2018, as defined in CCR, Title 1, Section 42

I, Tracy Childs, am writing to the State Board of Education, requesting for changes to be made to the proposed nutrition guidelines in the interest of the student's health.

I am a mother, a nutrition educator, and a cooking expert in San Diego. As a parent, I believe that our schools should serve our kids the highest quality food. When my kids were attending California public schools, foods like hot dogs, salami, and bacon were common on their lunch menus. Since then, we've learned from the World Health Organization that these foods are group 1 carcinogens. Unfortunately, our schools' menus still haven't caught up to the science. But we can change that.

I believe that California can be a leader in offering our kids healthy school food, so today I am asking the Department of Education to do the following:

- **Offer a plant-based entrée at each meal.** Fruits, vegetables, whole grains, and legumes are low in saturated fat, free of cholesterol, and packed with vitamins, minerals, phytochemicals, and fiber. These foods help prevent childhood obesity, type 2 diabetes, and heart disease. When kids are introduced to these healthful foods at a young age, they will more easily adopt healthy habits that they can pass on to the next generation.
- **Remove processed meat.** Hot dogs and pepperoni pizza are common staples in school lunch rooms in California, despite the World Health Organization declaring that processed meats, including hot dogs, are "carcinogenic to humans" and that there is no amount safe for consumption. As a matter of fact, hot dogs are also the No. 1 choking risk for children.
- **Offer dairy alternatives as an option for students.** Infants and children produce enzymes that break down lactose, the sugar found in breast milk and cow's milk, but as we grow up, many of us lose this capacity. Lactose intolerance is common, affecting about 95 percent of Asian Americans, 74 percent of Native Americans, 70 percent of African Americans, 53 percent of Mexican Americans, and 15 percent of Caucasians. Symptoms include upset stomach, diarrhea, and gas. For students who have lactose intolerance, this is disruptive to their school day. Having nondairy milks available to all is more inclusive and necessary.

Thank you for your consideration in making healthful foods more accessible in schools.

Sincerely,

Tracy Childs

From: Herby,Anna
To: REGCOMMENTS
Subject: Comments Regarding Nutrition Guidelines
Date: Wednesday, April 17, 2019 3:00:22 PM
Attachments: A.herbyCDEComments.docx

Please see attached for comments regarding nutrition guidelines.

Thank you!

Anna Herby, RD, CDE

Registered Dietitian | Certified Diabetes Educator

Adventist Health Howard Memorial

One Marcella Drive | Willits, CA 95490

P 707-456-3132 | F 707-459-9010

Proposed California Nutrition Guidelines Comments

April 17, 2019

RE: Edits made by State Board of Education on regulation text originally noticed on September 21, 2018, as defined in CCR, Title 1, Section 42

I, Anna Herby, RD, CDE, am writing to the State Board of Education, requesting for changes to be made to the proposed nutrition guidelines in the interest of students' health.

I work at Frank R. Howard Memorial Hospital in Willits, Ca. In my work as a dietitian, I often get referrals to counsel children regarding conditions such as childhood obesity, pre-diabetes, type 2 diabetes, and even risk factors for heart disease, like high cholesterol and high blood pressure. In addition to educating children about foods that prevent diseases, I believe we must lead by example and offer these foods daily at school. The foods we serve our children can be powerful for protecting their health and reversing the troubling trend of lifestyle-related diseases. I'm asking the Department of Education to consider the following:

- **Offer a plant-based entrée at each meal.** Colorful foods like fruits, vegetables, whole grains, and legumes should be in the center of our children's plates. They are low in saturated fat, free of cholesterol, and packed with vitamins, minerals, phytochemicals, and fiber. These foods help prevent [obesity](#), [type 2 diabetes](#), and [heart disease](#).
- **Remove processed meat.** In 2015, the World Health Organization classified processed meat—or hot dogs, pepperoni, bacon, sausage and deli meat—as [carcinogenic](#) to humans. Just one hot dog or two strips of bacon per day increases the risk of colorectal cancer by 18 percent. At my hospital, we removed processed meats from patient menus as well as from our restaurant and found that patients love ordering healthier, plant-based alternatives. As leaders in the community, both hospitals and schools should take the initiative to remove these harmful foods from the menu and promote healthier options.
- **Offer dairy alternatives as an option for students.** According to the Dietary Guidelines for Americans, dairy products are the number one source of saturated fat in the American diet and milk is the number one source of saturated fat in kids' diets. Dairy and milk consumption has also been linked with certain types of [cancer](#) and [early death](#). Additionally, we now know that drinking milk is not necessary for building strong bones. A 2005 [review](#) published in *Pediatrics* showed that milk consumption does not improve bone integrity in children. Plant-based milks like almond milk and soy milk are healthier replacements for dairy milk and should be provided at each meal.

The food we serve young Americans can make the difference between a lifetime of health or a lifetime of sickness. By providing examples of nutritious, plant-centered meals every day, we can set children up with healthy habits and pave the way towards healthier communities.

Thank you for your efforts and consideration.

Sincerely,

Anna Herby, RD, CDE

From: Nancy Weiss
To: REGCOMMENTS
Subject: Please find the attached letter of support
Date: Thursday, April 18, 2019 1:34:33 PM
Attachments: Nancy Weiss Plants based.pdf

Dear Patricia,
Please find my letter regarding much needed changes to school food and nutritional guideline.
I am passionate and committed to seeing that more plants become the mainstay in school kitchen across my beautiful State and beyond!
Thank you for your consideration~
Nancy Weiss



Nancy Weiss
Director of Food Service
Santa Barbara Unified School District
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Santa Barbara Unified School District - "Every child, every chance, every day."

Proposed California Nutrition Guidelines Comments

April 3, 2019

RE: Edits made by State Board of Education on regulation text originally noticed on September 21, 2018, as defined in CCR, Title 1, Section 42

I, Nancy Weiss, FSD, am writing to the State Board of Education, requesting for changes to be made to the proposed nutrition guidelines in the interest of the student's health.

When I first came to Santa Barbara Unified School District in 2007, our students were served mostly processed, "heat-and-serve" meals. Today, SBUSD serves a fully scratch-cooked menu, using whole grains and fresh, local organic produce. I'm so happy to be able to offer our students these foods, and I believe that it's possible to provide the same type of high quality foods for all students in California. That's why I'm asking the Department of Education to do the following:

- 1) **Add more plant-based options to the menu:** At SBUSD, we serve at least one plant-based option at every meal: foods like burritos, Asian noodle bowls, plant-based "meatball" subs, and more. These dishes have been successful with our students and often sell out more quickly than the meat-based meals. Of the 2 million meals SBUSD serves every year, approximately 50 percent are plant-based. We have even more plans to continue to expand our plant-based options.

Adding plant-based meals to the menu isn't only beneficial for our students' health, but it's also vital for the health of our planet. Plant-based meals help curb greenhouse gas emissions, save water, and reduce air and water pollution. Friends of the Earth recently calculated that by replacing beef chow mein with plant-based chow mein, SBUSD reduced our carbon footprint by 300,000 pounds of greenhouse gas emissions in two years. That's just one meal at one school district; imagine the impact we could make if we encouraged plant-based options throughout the state.

- 2) **Remove processed meat from the menu:** It goes without saying that carcinogens don't belong on the lunch line. This school year, our district has completely removed processed meat, like pepperoni and deli meat, from our menu. The transition has been simple: there are plenty of healthier options that can easily replace processed meat.
- 3) **Make plant-based, nondairy milks more easily accessible and recommended:** While my district runs on offer versus serve, it would be beneficial to relieve the financial burden that many food service directors see as a barrier to offering fluid milk alternates by making them fully reimbursable just like cow's milk. Most kids are lactose intolerant with this being especially true among minorities. It is my job as a food service director to make sure my students are getting the best nutrition. Calcium, vitamin D and other vital nutrients found in cow's milk are also in beverages such as soy milk. I want all schools in

California to be able to have zero financial barriers to offering soy milk or other fluid milk alternates to students.

California has the opportunity to become a leader in protecting our kids' health and the health of our planet by promoting healthier school food.

Thank you for your efforts and consideration.

Sincerely,



Nancy Weiss
Director of Food Service
Santa Barbara Unified School District

From: Mark Kennedy
To: REGCOMMENTS
Subject: 45-Day Notice of Modifications to Text of Proposed Regulations Regarding Nutrition Guidelines for School Breakfast and Lunch
Date: Thursday, April 25, 2019 1:43:05 PM
Attachments: CDE_comments (2019-04-25).pdf

Dear Ms. Alverson:

Attached please find comments submitted by the Physicians Committee for Responsible Medicine on behalf of its more than 25,000 California members. Can you please confirm that you received and were able to open the file? Thank you.

Mark Kennedy, Vice President of Legal Affairs

Physicians Committee for Responsible Medicine

5100 Wisconsin Ave NW, Suite 400, Washington, DC 20016

O: 202.527.7315 | *facebook twitter instagram*

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PhysiciansCommittee

for Responsible Medicine PhysiciansCommittee.org

April 25, 2019

Patricia Alverson, Regulations Coordinator
Legal, Audits and Compliance Branch
Administrative Support and Regulations Adoption Unit
California Department of Education
1430 N Street, Room 5319
Sacramento, CA 95814

Submitted via email to regcomments@cde.ca.gov

Re: 45-Day Notice of Modifications to Text of Proposed Regulations Regarding Nutrition Guidelines for School Breakfast and Lunch

Dear Ms. Alverson:

The Physicians Committee for Responsible Medicine is a 501(c)(3) nonprofit organization that promotes good nutrition, advocates for preventive medicine, and conducts clinical research studies that examine the effects of diet on weight, cardiovascular risk, cancer prevention and survival, and other health issues. Over the past decade, the Physicians Committee's staff scientists have authored more than forty articles published in peer-reviewed journals. Since 2007, the Physicians Committee has published the *Nutrition Guide for Clinicians*, a comprehensive manual, now in its third edition, that explains nutrition's role in the prevention and treatment of 87 different diseases and conditions. On behalf of the Physicians Committee and its more than 25,000 California members, I thank you for the opportunity to comment.

Last year the California Department of Education sponsored legislation¹ that removed or weakened Education Code provisions that formerly protected student health. The Department's successful efforts resulted in these statutory changes, among others:

Cal. Educ. Code § 49590

- Formerly: "The State Department of Education *shall ensure* that the nutrition levels of meals served to schoolage children pursuant to the National School Lunch Act be of the highest quality and greatest nutritional value possible."
- Now: "The Legislature finds and declares that the State of California *strives* to serve food of the highest quality and greatest nutritional value possible."

Cal. Educ. Code § 49531.1(b)

- Formerly: "The nutrition guidelines shall include guidelines for fat, saturated fat, and cholesterol, and *shall specify that where comparable food products of equal nutritional*

value are available the food product lower in fat, or saturated fat, or cholesterol shall be used.”

- Now: “The nutrition guidelines for school lunches and breakfasts, pursuant to subdivision (a), *shall be consistent* with the requirements for *nutritionally adequate* breakfasts and *nutritionally adequate* lunches, as defined in subdivision (b) of Section 49531.”

This evisceration of longstanding nutrition standards is an obvious error that the Department can rectify with strong nutrition guidelines. The Physicians Committee therefore submits the following recommendations.

1: Exclude processed meat.

In 2015, the World Health Organization’s International Agency for Research on Cancer (“IARC”) classified processed meat—which includes bacon, deli slices, sausage, hot dogs, and other meat products preserved with additives or otherwise manipulated to alter color, taste, and durability—as carcinogenic to humans.² IARC made this determination after assessing more than 800 epidemiological studies investigating the association of cancer with consumption of red meat or processed meat in many countries, from several continents, with diverse ethnicities and diets. Among other things, IARC highlighted a meta-analysis that found that each 50-gram portion of processed meat—approximately the size of a hot dog or two strips of bacon—eaten daily increases the risk of colorectal cancer by 18 percent. Group 1 is the agency’s highest evidentiary classification; other Group 1 carcinogens include tobacco smoking, secondhand tobacco smoke, and asbestos.³

Prior to this classification, the World Cancer Research Fund, in conjunction with the American Institute for Cancer Research, found in a comprehensive analysis of research that processed meat is “convincing” as a risk factor for colorectal cancer.⁴ The combination of evidence indicates a 30 to 50 percent increased risk for colorectal cancer when consumption of processed meat is highest.⁵

Investigators in the European Prospective Investigation into Cancer and Nutrition, which followed 448,568 men and women, discovered an 11 percent increased risk of dying from cancer with the consumption of 50 grams of processed meat per day.⁶ In contrast, substitution studies have found that replacing one serving of processed meat per day with nuts decreased risk for disease by 19 percent and replacement with legumes decreased risk by 10 percent.⁷

Colorectal cancer rates are on the rise for young people, according to a 2017 study in which researchers tracked cancer incidence rates for 490,305 individuals. For those within the 20 to 39 year age range, cancer rates increased as much as 2.4 percent each year since the 1980s and through the 1990s. When compared to those born in the 1950s, those born around 1990 have double and quadruple the risks of colon and rectal cancers, respectively, due to low-fiber diets, high consumption of processed meat, and lack of physical activity.⁸ Colorectal cancer is now the second leading cause of cancer death in the United States.⁹

Against this backdrop, the American Medical Association “calls on US hospitals to improve the health of patients, staff, and visitors by . . . eliminating processed meats from menus.”¹⁰ If the Department does not take similar steps to protect students, schools will continue to serve known

carcinogens in school meals, contravening the statutory goal of serving food “of the highest quality and greatest nutritional value possible.” *See* Cal. Educ. Code § 49590.

Therefore, the Department should amend the proposed nutrition guidelines, in Cal. Code Regs. tit. 5, §§ 15558(a), 15559(a), to prohibit schools from serving processed meat in school lunches and breakfasts.

2: Recommend a plant-based entrée at each meal.

In the United States today, one in three children is overweight or obese, will have type 2 diabetes, and is at risk of heart disease. Serving students healthy, plant-based foods and limiting processed meat and dairy products—which are major sources of cholesterol, sodium, and calories—can change these dire statistics. Fruits, vegetables, whole grains, and legumes are low in saturated fat, free of cholesterol, and high in vitamins, minerals, phytochemicals, and fiber. These foods help prevent childhood obesity, type 2 diabetes, and heart disease.

Obesity: The prevalence of obesity among our nation’s youth has tripled in the past 30 years.¹¹ Childhood obesity can lead to certain cardiovascular risk factors such as hypertension, high cholesterol, and abnormal glucose tolerance or diabetes. In 2011, the Centers for Disease Control and Prevention found that 70 percent of obese children had at least one additional cardiovascular risk factor for heart disease, such as raised blood pressure or insulin levels, while 30 percent presented two or more additional risk factors.¹² Eating a diet of fruits, vegetables, grains, and legumes, people tend to feel satisfied with fewer calories. For example, a child who chooses a veggie burger instead of a hamburger will save 180 calories. As an added benefit, the veggie burger has no cholesterol and 6 extra grams of fiber. A bean burrito loaded with lettuce, tomato, and salsa has 135 calories fewer than a beef and cheese burrito while still providing all the nutrients children need.

Cancer: Research shows a direct association between the amount of excess weight in childhood and cancer risk in adulthood. For every one-point increase in body mass index, there is a 9 percent increase in adult cancer risk.¹³ The more overweight a child is, the greater the risk of developing cancer is later on. Cancers of the colon, breast, and prostate are influenced by diet, exercise, and healthy weight control. Lifelong eating habits are established in childhood, and the longer the exposure to cancer-fighting foods and the avoidance of cancer-promoting foods, the greater the likelihood that cancer will not strike during adulthood. A study published in the *International Journal of Cancer* found that vegetarians have reduced breast cancer risk, compared to meat-eaters, most likely due to the abundance of healthful foods and avoidance of meat throughout their lives.¹⁴

Diabetes: Although it is almost entirely preventable, type 2 diabetes is one of the most prevalent and costly chronic diseases in the United States. Without a change in eating and exercise habits, one in three people born in the year 2000 will develop type 2 diabetes in adulthood. For those of Hispanic origin, one in two will develop this disease.¹⁵

Heart Disease: In 2010, the Centers for Disease Control and Prevention found that 20 percent of adolescents aged 12-19 have at least one abnormal lipid level: LDL cholesterol, HDL cholesterol, or triglycerides. Among overweight and obese adolescents, those rates were even

higher, with 22 percent of overweight and 43 percent of obese children having one or more abnormalities.¹⁶ Abnormal lipids are risk factors for heart disease, which is the number one cause of death in the United States.¹⁷

In September, Governor Brown signed into law SB-1138, which requires licensed health care facilities and state prisons to “make available wholesome, plant-based meals” to patients and prisoners. 2018 Cal. Stat. ch. 512. The Department should likewise protect students by amending its proposed nutrition guidelines, at Cal. Code Regs. tit. 5, §§ 15558(b)(1), 15559(b)(1), to recommend that schools offer a low-fat, plant-based entrée at each lunch and breakfast.

3: Require fluid milk substitutes.

Tens of millions of Americans suffer from lactose intolerance. Because “lactose intolerance is a common and normal condition among many Americans, especially African Americans, Asian Americans, and Native Americans, with a lower prevalence in whites, often manifesting in childhood,” the American Medical Association recommends 1) removing requirements that make it difficult for school children “to receive an alternative to cow’s milk” and 2) indicating in “federal nutrition guidelines that meat and dairy products are optional, based on an individual’s dietary needs.”¹⁸

The majority of California public school students—72.3 percent—fall into one of the above demographic groups.¹⁹ But many California schools do not offer them fluid milk substitutes except in limited circumstances involving written requests from parents or medical authorities.

Plant milks can provide calcium, protein, and other vitamins and minerals without any of the health risks associated with dairy milk. As such federal regulations authorize schools participating in the National School Lunch Program and the School Breakfast Program to serve plant milks to students with disabilities, to students with medical or other special dietary needs, and to all students as “competitive foods.” See 7 C.F.R. §§ 210.10(d)(3), 210.10(m), 210.11, 220.8(d), 220.8(m), 220.12.

The Department should amend the proposed nutrition guidelines, in Cal. Code Regs. tit. 5, §§ 15558(a), 15559(a), to require schools to offer plant-based fluid milk substitutes—without a written request—at all times.

4: Do not delete Formerly Proposed Sections of the Nutrition Guidelines

In its notice dated March 15, 2019, the Department highlighted the newly weakened nutrition standards on four occasions, stating,

Formerly Proposed Section 15558(b) is *deleted. This is necessary* because California Education Code (EC) 49531.1 was amended on September 20, 2018, through Assembly Bill (AB) 3043 which deleted the requirement for the state nutrition guidelines for school lunches to include guidelines for fat, saturated fat, and cholesterol.

Formerly Proposed Section 15558(c) is *deleted. This is necessary* because EC 49531.1 was amended on September 20, 2018, through AB 3043 which deleted the requirement for the state nutrition guidelines for school lunches to include guidelines that specify that

where comparable food products of equal nutritional value are available, the food product lower in fat, or saturated fat, or cholesterol shall be used.

...

Formerly Proposed Section 15559(b) is *deleted. This is necessary* because EC 49531.1 was amended on September 20, 2018, through AB 3043 which deleted the requirement for the state nutrition guidelines for school breakfasts to include guidelines for fat, saturated fat, and cholesterol.

Formerly Proposed Section 15559(c) is *deleted. This is necessary* because EC 49531.1 was amended on September 20, 2018, through AB 3043 which deleted the requirement for the state nutrition guidelines for school breakfasts to include guidelines that specify that where comparable food products of equal nutritional value are available, the food product lower in fat, or saturated fat, or cholesterol shall be used.²⁰

It is erroneous to characterize these voluntary deletions as “necessary.” By statute, “The Department of Education . . . shall establish a statewide program to provide nutritious meals at school for pupils.” Cal. Ed. Code § 49512. Additionally, “[t]he department shall develop and maintain nutrition guidelines for school lunches and breakfasts, and for all food and beverages sold on public school campuses.” Cal. Ed. Code § 49531.1(a). Given these broad statutory grants of authority and responsibility, even absent an explicit mandate to do so reduce fat, saturated fat, and cholesterol—simple goals that are universal in all modern nutrition recommendations—the Department is authorized to take such a basic step to protect student health.

This is all the more true because the California legislature specifically found “that (1) the proper nutrition of children is a matter of highest state priority, and (2) there is a demonstrated relationship between the intake of food and good nutrition and the capacity of children to develop and learn, and (3) the teaching of the principles of good nutrition in schools is urgently needed to assist children at all income levels in developing the proper eating habits essential for lifelong good health and productivity.” Cal. Ed. Code § 49530(a).

The Department therefore should reinstate the text it originally proposed for Section 15558(b)–(c) and Section 15559(b)–(c), subject to the following. The originally proposed text included, beginning on page 5, line 5, and on page 8, line 17, the following text: “shall choose lean meats, substitute meats for beans, peas, and lentils, and choose low-fat or nonfat dairy products when possible.” Given the context and in light of the scientific consensus regarding the benefits of plant-based meals, the Department should amend both instances of that text to read, “shall choose beans, peas, and lentils in place of meats and choose nondairy products when possible.”

Respectfully,



Mark Kennedy
Vice President of Legal Affairs

References

- 1 California Association of Private School Organization, Legislation Notes (2019), <https://www.capso.org/legislation/>.
- 2 Bouvard V, Loomis D, Guyton KZ, et al. Carcinogenicity of consumption of red and processed meat. *Lancet Oncology*. Published online October 26, 2015.
- 3 International Agency for Research on Cancer, Agents Classified by the IARC Monographs, Volumes 1–122 (2018), http://monographs.iarc.fr/ENG/Classification/List_of_Classifications.pdf.
- 4 World Cancer Research Fund / American Institute for Cancer Research. Food, Nutrition, Physical Activity and the Prevention of Cancer: A Global Perspective. Continuous Update Project. Washington, DC: AICR; 2011.
- 5 Vargas AJ, Thompson PA. Diet and Nutrient Factors in Colorectal Cancer Risk. *Nutr Clin Pract*. 2012;27(5):613-623.
- 6 Rohrmann S, Overvad K, Bueno-de-Mesquita HB, et al. Meat consumption and mortality—results from the European Prospective Investigation into Cancer and Nutrition. *BMC Medicine*. 2013;11:63-75.
- 7 Pan A, Sun Q, Bernstein AM, et al. Red meat consumption and mortality: results from 2 prospective cohort studies. *Arch Intern Med*. 2012;172(7):555-563.
- 8 Siegel RL, Fedewa SA, Anderson WF, et al. Colorectal cancer incidence patterns in the United States, 1974-2013. *J Natl Cancer Inst*. Published online February 28, 2017.
- 9 Centers for Disease Control and Prevention, CDC Awards \$22,800,000 to Increase Colorectal Cancer Screening (2015), <https://www.cdc.gov/media/releases/2015/p0930-cancer-screening.html>.
- 10 American Medical Association, Healthy Food Options in Hospitals H-150.949 (2018), <https://policysearch.ama-assn.org/policyfinder/detail/Healthy%20Food%20Options%20in%20Hospitals%20H-150.949?uri=%2FAMADoc%2FHOD.xml-0-627.xml>.
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- 12 CDC grand rounds: childhood obesity in the United States. *MMWR Morb Mortal Wkly Rep*. 2011;60:42-46.
- 13 Jeffreys M, Smith GD, Martin R M, Frankel S, Gunnell D. Childhood body mass index and later cancer risk: a 50-year follow-up of the Boyd Orr study. *Int J Cancer*. 2004;112:348-351.
- 14 Dos Santos Silva I, Mangtani P, McCormack V, Bhakta D, Sevak L, McMichael AJ. Lifelong vegetarianism and risk of breast cancer: a population-based case-control study among South Asian migrant women living in England. *Int J Cancer*. 2002;99:238-244.
- 15 Narayan KM, Boyle JP, Thompson TJ, Sorensen SW, Williamson DF. Lifetime risk for diabetes mellitus in the United States. *JAMA*. 2003;290:1884-1890.
- 16 Prevalence of abnormal lipid levels among youths—United States, 1999-2006. *MMWR Morb Mortal Wkly Rep*. 2010;59:29-33.
- 17 Roger VL, Go AS, Lloyd-Jones DM, et al. Heart disease and stroke statistics--2011 update: a report from the American Heart Association. *Circulation*. 2011;123:e18-e209.

- 18 American Medical Association, Culturally Responsive Dietary and Nutritional Guidelines D-440.978 (2018), <https://policysearch.ama-assn.org/policyfinder/detail/D-440.978?uri=%2FAMADoc%2Fdirectives.xml-0-1522.xml>.
- 19 Lucile Packard Foundation for Children's Health, Public School Enrollment, by Race/Ethnicity (2016), <https://www.kidsdata.org/topic/36/publicschoolenrollment-race/table#fmt=451&loc=2&tf=88&ch=7,11,621,85,10,72,9,73&sortColumnId=0&sortType=asc>.
- 20 California Department of Education & California Board of Education, 45-Day Notice of Modifications to Text of Proposed Regulations Regarding Nutrition Guidelines for School Breakfast and Lunch (2019) (emphasis added), <https://www.cde.ca.gov/re/lr/rr/documents/nsd2nd45daynotice.docx>.

From: Matt Ruscigno
To: REGCOMMENTS
Subject: school lunch Assembly Bill 479
Date: Monday, April 29, 2019 1:45:45 PM

Patricia Alverson,

As a public health dietitian in Los Angeles I have firsthand experience with the detrimental effects poor nutrition has on students. But I've also witnessed how healthy food can change lives. I've worked closely with low-income schools who have incorporated gardening and cooking programs to expose students to healthy food. When given the opportunity, students will eat healthy food. It's up to all of us who work with school systems to create a healthier environment, including plant foods as regular options for lunch, in order for students to make these healthy choices.

I urgently ask for your support of AB 479 to incentivize greater consumption of plant-based foods. By investing an estimated \$5 million to fund plant-based meals in schools, test recipes, and train staff to prepare healthy food, we will improve kids' health, save millions of health care dollars in the long run, and promote the future health of our state.

There is an overwhelming public health consensus on the need to reduce consumption of processed and red meat in favor of more plant-based foods. In fact, the US government's 2015-2020 Dietary Guidelines for Americans recommends that teenage boys and men reduce their meat consumption. It also found that vegetarian and low meat Mediterranean diets are "associated with reduced risk of obesity, type 2 diabetes and some types of cancer."

thank you,
Matt Ruscigno, MPH, RD