

Post Office Box 4091
Des Moines, Iowa 50333
July 21, 1992

Robert C. Bonner, Administrator
Drug Enforcement Administration
Washington, D.C. 20537

Dear Mr. Bonner:

I just finished reading your decision on the Marijuana Rescheduling Petition, 57 FR 10499 (March 26, 1992). Your explanation of the scheduling criteria in the Controlled Substances Act (CSA) left me confused. By your definition, a substance in Schedule II is a scientifically established chemical compound capable of reproduction in standardized dosages. Of course, marijuana is not such a substance, it is a plant, not a drug.

Although you made no mention of the fact, the coca plant, from which cocaine is made, and the opium plant, from which morphine and heroin are made, are both in Schedule II of the CSA. As I was reading your decision, I wondered how these two plants can be in Schedule II. These plants are subject to the same variances in chemistry as the marijuana plant. It seems like you are treating marijuana unfairly.

If Congress intended to rely on scientifically established chemistry and reproducible dosages, why did Congress include the coca and opium plants in Schedule II?

It seems to me that these plants should not be included in the CSA at all, because they will never fit into your definition of drugs, and I think your definition is correct as far as it goes. However, since Congress has decided to include them in the CSA, your definition is inadequate to explain them. I hope you will correct your definition, and not simply ignore this apparent inconsistency.

Thank you for your attention.

Sincerely,

Carl Eric Olsen
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