



Elizabeth Nicholas <enicholas@ucriverkeeper.org> on 04/06/2004 11:25:12 AM

To: politicalcommitteestatus@fec.gov
cc:

Subject: Comment Letter on FEC Proposed Rules

Please find attached comments submitted on behalf of Upper Chattahoochee Riverkeeper in MS Word format. If you have any problems opening this document, please let me know and I can send by mail or fax.

Thank you for considering our comments.

Elizabeth Nicholas

General Counsel

Upper ChattahoocheeRiverkeeper

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Please become a member of Upper ChattahoocheeRiverkeeper. It's easy - go to www.chattahoochee.org and use PayPal



- FEC comment letter.doc

UPPER CHATTAHOOCHEE
RIVERKEEPER

Reclaiming Our River

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April 6, 2004, 2004

SUBMITTED ELECTRONICALLY

Ms. Mai T. Dinh
Assistant General Counsel
Federal Election Commission
999 E. St., N.W.
Washington, DC 20463
politicalcommitteestatus@fec.gov

RE: Federal Election Commission's Proposed Rules Regarding Political Committees

The Upper Chattahoochee Riverkeeper Fund, Inc., (UCR) is a non-profit environmental advocacy organization representing over 2,700 members in Georgia and throughout the United States. Our mission is to advocate and secure the protection and stewardship of the Chattahoochee River, its tributaries and watershed, in order to restore and conserve their ecological health for the people and fish and wildlife that depend on the river system. UCR actively uses advocacy, education, research, communication, cooperation, monitoring and legal actions to protect and preserve the Chattahoochee and its watershed.

UCR is very concerned about the proposed rules that establish a new threshold for when an organization becomes a regulated federal political committee. Under these rules, many nonprofit environmental organizations similar to UCR, could be transformed into political committees. This would cripple the ability of most of these organizations to raise and spend funds and drive many out of existence. Nonprofit organizations would lose the ability to carry out many important functions, such as education, conservation, research, community outreach, and protecting wildlife for the benefit of all.

The democratic process depends not only on citizens voting, but also on people and nongovernmental organizations speaking up about the issues of the day, including pending legislation and acts by public officials. Environmental organizations must be able to criticize a candidate who proposes to weaken environmental statutes and be allowed to back those candidates who actively support the protection of the environment.

Such advocacy is in fact protected by the First Amendment of the United States Constitution.

The proposed rules will limit nonprofit organizations from communicating with its members on important policy issues. It is our understanding that the regulations will apply to communications such as web advertisements, e-mail alerts, speeches, canvassing messages, and print ads. The ability to communicate through these means on policy issues affecting an organization's mission is critical to effective public involvement. The proposed regulations would have a chilling effect on the democratic process and prevent citizens from being able to become involved and informed on issues that affect their lives.

UCR urges the FEC to reconsider the proposed rules, and only adopt rules that are protective of the democratic process and the rights of citizens and organizations to participate and make their voice heard on issues that affect them.

Respectfully Submitted,

Elizabeth Nicholas

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