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First name: Rob Last name: Shaul

Organization: Mountain Pursuit

Title: President

Comments: Sir/Ma'am -

My name is Rob Shaul, and I'm the Founder/President of Mountain Pursuit, a western-state hunting advocacy 501(c)(3) nonprofit organization headquartered in Jackson, Wyoming.

Mountain Pursuit believes e-bikes are motorized vehicles and should not be given any special designation under the federal regulations. And as motorized vehicles, e-bikes should be restricted to trails where motorized and motorcycle use is currently allowed.

Research has shown that all non-powered mountain bikes have a significant impact on big game behavior similar to that of ATVs. While we are not aware of any specific research on the impact of e-bikes to wildlife behavior, we believe it would detrimental.

As such, we are against not only any special e-bike vehicle designation, but also any additional trail designation for ebikes beyond what is currently designated for motorcycles.

Creating a special vehicle designation for e-bikes sets a troubling precedent. We believe it will only be a matter of time before electrification comes to motorcyles, ATVs and side-by-sides. Already Polaris is rapidly developing an electric ATV and a company named Cake has developed a widely-reviewed electric motorcycle which is very similar in appearance to an e-bike. We fear once electric motorcycles, ATVs and side-by-sides become wildly available and popular, users of these vehicles will use approach the USFS about special e-categories, using the e-bike designations as precedent - and with that, access to more trails/roads in the forest system.

Motorized = motorized, electric or whatever. All motorized vehicles should be treated the same.

Respectfully, Rob Shaul. President