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Comments: To whom it may concern,

Below are the comments from the Colorado Chapter of Backcountry Hunters and Anglers (BHA), addressing the proposed revisions to the Forest Service guidance on management of electric (E-bike) use on National Forest System lands.

The proposed 3 tiered description of e-bikes (250W, 500W, and 750W), allowing potentially different uses for differing Forest Service lands ignores the basic premise that electric powered bicycles are still motorized vehicles. We believe all classes of motorized bikes on Forest Service lands should be limited to motorized routes designated in the Forest travel management plans we've had for decades. Our public lands are already over-used in many areas, negatively impacting the recreational experience, along with negative impacts on wildlife. Over several decades, scientific studies have observed negative impacts on wildlife, any time a new technology enables more people to recreate further into sensitive wildlife areas. Adding yet another technology to bring even more people into those areas will further the decline of many of our game species.

The upper class of e-bike (750W) actually equals 1 horsepower. Dropping to the lowest class (250W) still provides 1/3 of a horsepower, equal to the output of top athletes over a 2 hr. time period. We do not feel that adding hundreds, if not thousands, of recreational e-bikers to an already overcrowded landscape is in the best interest of the greatest number of people. We feel the downsides far outweigh the upsides.

BHA encourages the Forest Service to treat e-bikes the same as any other powered cycle. There are already full size electric dirt bikes. Differentiating between these classes would be an enforcement nightmare. Labeling e-bikes as motorized vehicles and keeping them on current motorized routes eliminates this issue, along with the aforementioned down sides to big game and to the recreational experience for other users.