I oppose the proposed directive.  The bottom line - there is a motor on an e-bike, that makes it a motorized device.  As an individual that works on public lands and open spaces alongside federal and municipal partners, and is involved in conservation and stewardship efforts to protect those lands, I find this proposed rule to be shortsighted and impractical.  Many of our public lands are already at critical levels of impact and the numbers of recreational users are already increasing.  Adding motorized e-bike use to traditionally non-motorized areas will see impacts and resource damage increase further, greatly diminishing public land experiences and destroying the noble and sustainable ability to regulate impacts via natural muscle-powered use.

The Class 1 and Class 3 categories are very slippery slopes in terms of adding even more speed to high use areas, and enforcement of many public lands is already lacking to not only enforce proper use, but proper speeds.  Higher speeds and a greater number of users on multi-use trails will greatly diminish user experience and increase user conflicts.  Higher speeds and the ability to 'go farther - faster' will put more people into more remote areas and greatly impact wildlife habitat and natural ecosystems.

Class 2 e-bikes have throttles and a motor, that is a motorcycle. They should not be allowed on any non-motorized trails.

There is a place for e-bikes and indeed they may help get more people who otherwise may not have been able to recreate, to recreate. I support this, however, not at the cost of destroying user experiences and increasing impacts to diminishing public lands.  I would like to see the agency manage e-bikes as a separate and different user group, not the same as a non-motorized, human-powered device.

I fully support disabled access and believe that recreators with disabilities should be able to access non-motorized use with motor assistance, perhaps noted with a sticker or some kind of registration.

The technology is already there to 'override' the speed controls on e-bikes, and that same technology is only going to create better, longer-lasting batteries, and higher speeds.  Soon, e-bikes will be more like motorcycles, and motorcycle technology will be more like e-bikes.  For this reason alone, e-bikes should be considered a separate user and managed separately from non-motorized, human-powered uses.

In addition to the above, I would also dislike seeing the decades of advocacy work done for sustainable and shared human-powered uses on trails to be eliminated as the two are no longer aligned since the e-bike (in this ruling) would be considered the same as a bicycle.  This will pit other muscle-powered users against bicyclists and what was a compatible and sustainable shared use will become further separated and divisive, ultimately realizing a potential loss of access for bicycles.

Please consider electric bicycles as a separate user group and manage them separately.  Do not change the definition of what a motor is or is not - a motor is motorized.  Please do allow land managers, via the travel management process, to determine what places or areas might be suitable for e-bikes and allow the public process to help determine sustainable ways to include the separate e-bike user group.

Thank you for the chance to comment.

David Ochs

PO Box 2562

Crested Butte, CO 81224