



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
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To: All Field Officials
Attn: State Directors, District Managers, Field Managers and Accessibility Coordinators

From: Assistant Director, National Conservation Lands and Community Partnerships

Subject: Considering and Authorizing Reasonable Modification Requests for Use of E-bikes on Non-Motorized Bicycle Trails

This Information Bulletin (IB) is intended to help field offices identify and process requests from persons with disabilities to use electric bicycles (e-bikes) as an “other power-driven mobility device” (OPDMD) to access certain public lands. This IB does not apply to requests to use e-bikes on trails in wilderness or wilderness study areas.

E-bikes are bicycles that contain an electric motor to provide power assistance to the rider and reduce the physical exertion required to propel the bike forward. They are motorized vehicles capable of, or designed for, travel on land or other natural terrain and, therefore, fall within the definition of off-road (off-highway) vehicle at 43 CFR 8340.0-5. E-bikes are widely used and increasingly popular across the country, and Bureau of Land Management (BLM) field offices frequently receive requests from members of the public to use e-bikes on trails that are not designated as available for motorized vehicle use. If a request is made by persons with disabilities to ride e-bikes as an OPDMD on trails where off-highway vehicle use is otherwise prohibited, the BLM should construe that request as one for a “reasonable modification” under section 504 of the Rehabilitation Act of 1973, as amended.

When presented with a request for a reasonable modification, the BLM must comply with section 504, which requires federal programs or activities, when viewed in their entirety, to be readily accessible to and usable by persons with disabilities. Where Federal programs or activities are not readily accessible to or usable by persons with disabilities, Federal agencies must grant requests for reasonable modifications unless the requested modification is determined to constitute a fundamental alteration in the nature of a program or activity or an

undue financial and administrative burden.¹ As a result, when persons with disabilities request to use e-bikes on non-motorized trails, the BLM must process that request in accordance with Section 504 and ensure that persons with disabilities receive the benefits and services of the BLM program or activity requested. Compliance with section 504 is not discretionary.

The BLM recognizes the importance of addressing reasonable modification requests appropriately, consistently, and in a timely fashion. To better serve the public and meet the intent of the Rehabilitation Act, the following resources are available to help field offices identify and process reasonable modification requests from persons with disabilities to use e-bikes to access non-motorized bicycle trails:

- 1) Step-by-Step Process for Responding to Requests
- 2) Additional Information Inquiry (template)
- 3) Approval of E-bike Reasonable Modification (template)
- 4) Denial of E-Bike Reasonable Modification (template)

For further information, please contact Jonathan Shimkus, Public Civil Rights Program Manager at blm_hq_ocr_public_civil_rights@blm.gov or David Jeppesen, Travel, Transportation, and Accessibility Program Manager at d1jeppesen@blm.gov.

Signed by:

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Authenticated by:

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4 Attachments:

- 1- [Step-by-Step Process for Responding to Requests \(2 pp\)](#)
- 2- [Additional Information Inquiry Template \(1 p\)](#)
- 3- [Approval of E-bike Reasonable Modification Template \(1 p\)](#)
- 4- [Denial of E-Bike Reasonable Modification Template \(1 p\)](#)

¹ The Department of the Interior's regulations implementing section 504 are codified at 43 CFR Part 17, Subpart E.