



March 17, 2025

Jay Calhoun, Chief
National Park Service
Division of Regulations
Jurisdiction and Special Park Uses
MS-2472
1849 C Street NW
Washington, DC 20240

Submitted electronically via www.regulations.gov

Re: Notice of Proposed Rulemaking: Docket No. (NPS-2025-0001-0001)
Powered Micromobility Devices

Dear Chief Calhoun:

On behalf of the undersigned members of the Consortium for Constituents with Disabilities (CCD) Transportation Task Force, we write to thank you for the opportunity to submit comments to the National Park Service's (NPS) Notice of Proposed Rulemaking (NPRM), "Powered Micromobility Devices."¹ Included in the NPRM is a proposal to create a management framework for the use of powered micromobility devices in the National Park System. The proposed rule defines powered micromobility devices differently from other types of devices already defined in NPS regulations and creates rules for where and how these devices may be used in units of the National Park System. While we generally agree with the proposed rule, we recommend that the NPS provide an exemption for adaptive devices for people with disabilities.

CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society free from racism, ableism, sexism, and xenophobia, as well as LGBTQ+ based discrimination and religious intolerance. The Transportation Task Force advocates for fully accessible transportation across all modes.

We are pleased that NPS has begun the process of creating a framework that defines powered micromobility devices and specifically details where such devices are prohibited through this rulemaking. Defining powered micromobility devices is a critical step toward preventing accessibility barriers for people with disabilities in the National Park System. Unregulated micromobility devices cause problems for people with mobility and/or visual disabilities. When unregulated, such devices can

¹ National Park Service, Notice of Proposed Rulemaking – Powered Micromobility Devices (NPRM) (Jan. 16, 2025), available at <https://www.regulations.gov/document/NPS-2025-0001-0001>.

compromise the integrity of trails, public sidewalks, curb ramps, crosswalks, and transit stops. Without full use of these facilities, people with mobility and visual disabilities face significant barriers. If powered micromobility devices obstruct trails, passing spaces, and resting intervals in National Park Systems, people with disabilities who wish to visit may be forced to put their physical safety at risk. As a result, they might not visit at all.

Although defining powered micromobility devices may generally increase disability access, we strongly encourage the NPS to include an exclusion for adaptive devices for people with disabilities. The proposed rule would prohibit the use of powered devices in National Park System units except in designated locations. The NPS is currently proposing that the definition include a higher maximum weight than the typical weight for powered micromobility devices “in order to include heavier devices such as . . . adaptive devices designed for individuals with disabilities.”² A final rule implementing this definition could prevent people with disabilities who use adaptive devices that fall under the definition of powered micromobility devices from visiting national parks.

NPS regulations prohibit the operation of motor vehicles except on park roads, in parking areas, and on routes and areas designated for off-road motor vehicle use. NPS defines motor vehicles as every self-propelled vehicle and every vehicle that is propelled by electric power but not operated on rails or water.³ This definition includes an exception for motorized wheelchairs to facilitate access to national parks for people with disabilities. Additionally, devices that meet the definition of a wheelchair are allowed anywhere foot travel is allowed in national parks.⁴

The NPS should implement a similar exception in this rulemaking for adaptive devices in the powered micromobility definition. This exception will still allow for powered micromobility devices to be prohibited generally without depriving people with disabilities access to national parks. We recommend that an exception be general and not include specific excluded assistive devices, unlike how motorized wheelchairs are specifically excluded in the motorized vehicle definition. A general exception accounts for technological advancements that lead to the innovation of new adaptive devices.

Thank you for your leadership and work on this important rulemaking. This NPRM is a critical step to ensuring accessibility in the National Park System.

Sincerely,

Access Ready Inc
American Association of People with Disabilities
Amputee Coalition
Disability Rights Education & Defense Fund
Paralyzed Veterans of America
The Arc of the United States

² See <https://www.federalregister.gov/d/2024-31578/p-35>.

³ See 36 CFR 4.10 <https://www.ecfr.gov/current/title-36/section-4.10>.

⁴ See “Mobility Devices.” *National Park Service*, U.S. Department of the Interior, www.nps.gov/subjects/accessibility/mobility-devices.htm#:~:text=Wheelchairs%20and%20Mobility%20Aids&text=Those%20devices%20that%20meet%20the,to%20participate%20in%20Wilderness%20experiences.