

**Chesapeake & Ohio Canal  
National Historical Park**

District of Columbia, Maryland, and West Virginia

National Park Service  
U.S. Department of the Interior



**White's Ferry Area  
Development Concept Plan**

March 2023

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# ACRONYMS

<b>ABAAS</b>	Architectural Barriers Act Accessibility Standards
<b>ARPA</b>	Archeological Resources Protection Act
<b>C&amp;O</b>	Chesapeake & Ohio
<b>CE</b>	Categorical exclusion
<b>CFR</b>	Code of Federal Regulations
<b>DO</b>	NPS Director's Orders
<b>ESA</b>	Endangered Species Act
<b>FEMA</b>	Federal Emergency Management Agency
<b>FRVs</b>	Fundamental resources and values
<b>IBC</b>	International Building Code
<b>IVUMC</b>	Interagency Visitor Use Management Council
<b>LRIP</b>	Long-Range Interpretive Plan
<b>NCRO</b>	National Capital Region Office
<b>NEPA</b>	National Environmental Policy Act
<b>NFPA</b>	National Fire Protection Association
<b>NHPA</b>	National Historic Preservation Act
<b>NPS</b>	National Park Service
<b>NRHP</b>	National Register of Historic Places
<b>OIRVs</b>	Other important resources and values
<b>PEPC</b>	NPS Planning, Environment, and Public Comment
<b>PPV</b>	Person-per-vehicle
<b>USFWS</b>	U.S. Fish and Wildlife Service

# EXECUTIVE SUMMARY

The White's Ferry Area Development Concept Plan (Concept Plan) outlines potential improvements within the White's Ferry area that would provide new and enhanced public amenities for visitors to enjoy within the context of the site's ecological and historical setting along the Potomac River. The White's Ferry area is an approximately 73-acre site within the Chesapeake & Ohio (C&O) Canal National Historical Park ("the park") in western Montgomery County, MD. The site includes the park's Tracts 17-101 and 17-102, referred to as the "south tract" and "north tract," respectively, in this document.

The north and south tracts are two oblong riverfront tracts with forested areas and open spaces set within a rural landscape. The approximately 54-acre north tract is a predominately forested landscape with a pavilion, open field, and large unpaved parking lot. The approximately 19-acre south tract is also predominately wooded and includes sunny and shaded open space, 22 cabins formerly used for recreation, and additional structures linearly-arranged along an unpaved access road. Although the NPS acquired the south tract in the 1970s, the tract was continuously occupied by the White's Ferry Sportsman Club until 2021. The NPS now has the opportunity to holistically explore new future public uses of the north tract, which traditionally had been more accessible to the general public, and the south tract, which until recently had been exclusively occupied by a private organization.

The Concept Plan provides conceptual management options for the future of the White's Ferry area. At the beginning of the planning process, the NPS developed the goal for the Concept Plan to explore and identify future public uses of the White's Ferry area that:

- Expand public access to the White's Ferry area and provide new recreation opportunities

- Respect the site's location within the 100-year floodplain and ecological context along the Potomac River
- Offer compatibility with neighboring private properties
- Reflect realistic expectations for what the NPS can provide, manage, and maintain when planning for visitor use

## CONCEPT PLAN RECOMMENDATIONS

The Concept Plan outlines three potential concepts for the north tract and three potential concepts for the south tract. The activities and improvements identified in each concept could be implemented independently, or as part of a larger implementation strategy that cross multiple concepts. In other words, the NPS could mix-and-match the activities and improvements outlined in these concepts to best meet the project goals. The north and south tract concepts are also interchangeable with one another.

The three north tract concepts include improvements that would provide a range of amenities and facilities available for public day use and enjoyment, additional wildlife habitat, more efficient parking, and varying maintenance needs. The north tract concepts overall provide:

- Options for the **existing pavilion**, including repair/upgrade or removal
- Options for the existing open field east of the pavilion, including **sunny flexible space** for informal recreation, a **meadow**, or an **agricultural field**
- Options for **picnic areas and shaded flexible space** for informal recreation

- New and/or improved **forest buffer areas**
- Addition of curb stops to define parking spaces in the existing unpaved **parking lot**
- Options for the addition of a **vault toilet**

The three south tract concepts include new amenities that would provide river access and camping experiences at the park for individuals and groups of varying sizes. The south tract concepts overall provide:

- **Campsites**, with options for group or individual campsites, and tent or RV/camper camping
- **Universally accessible campsites** for visitors with mobility impairments
- Options for **sunny or shaded flexible space** for gathering and informal recreation
- **Potable water access**
- **Vault toilets**
- **Parking**
- **River access** for non-motorized watercraft and a small fishing pier
- Improved **riparian buffer**
- **Trail connection** to the C&O Canal Towpath

## MOVING FORWARD

The Concept Plan outlines both existing challenges and the steps needed to move toward implementation. The document describes current conditions and considers existing operational, maintenance, and environmental challenges. In addition, the Concept Plan identifies the regulatory framework for implementation.

The Concept Plan is conceptual and is not a decision document. The Concept Plan is the first step in the overall decision-making process for the future of the White's Ferry area. The Concept Plan provides recommendations for the NPS to consider when future proposals and decisions are being made. Potential concepts proposed in this Concept Plan would be further developed and analyzed for their potential to impact the human and natural environment. Furthermore, implementation may occur over time as funds become available.

A preferred concept, which could include a combination of improvements mixed-and-matched from different concepts, would be identified in the future through additional public and stakeholder engagement and the environmental and historical preservation compliance processes.

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South Tract - View of Existing Access Point to the Potomac River (2021)



# INTRODUCTION

The National Park Service (NPS) seeks to reimagine future use of an approximately 73-acre site within the Chesapeake & Ohio (C&O) Canal National Historical Park (“the park”) in a manner that provides new and enhanced public amenities and opportunities for group gathering and recreation along the Potomac River. The site, referred to as “the White’s Ferry area” in this document, includes the park’s Tracts 17-101 and 17-102 located in western Montgomery County, MD and is generally bound by the Potomac River to the west; Federal property to the north; White’s Ferry Road, River Road, and Federal property to the east; and Federal and private property to the south. The site surrounds a private property where the White’s Ferry river crossing operation and White’s Ferry Store & Grill are located. The future of the river crossing operation is outside of the scope of this Development Concept Plan and any future NPS project because the river crossing operation is not located on Federal property.

The White’s Ferry area is owned by the NPS and is managed by the C&O Canal National Historical Park unit of the NPS (**Figure 1**). The site includes open space, a picnic pavilion, a large parking lot, wooded areas, river access, structures, and access to private lands.

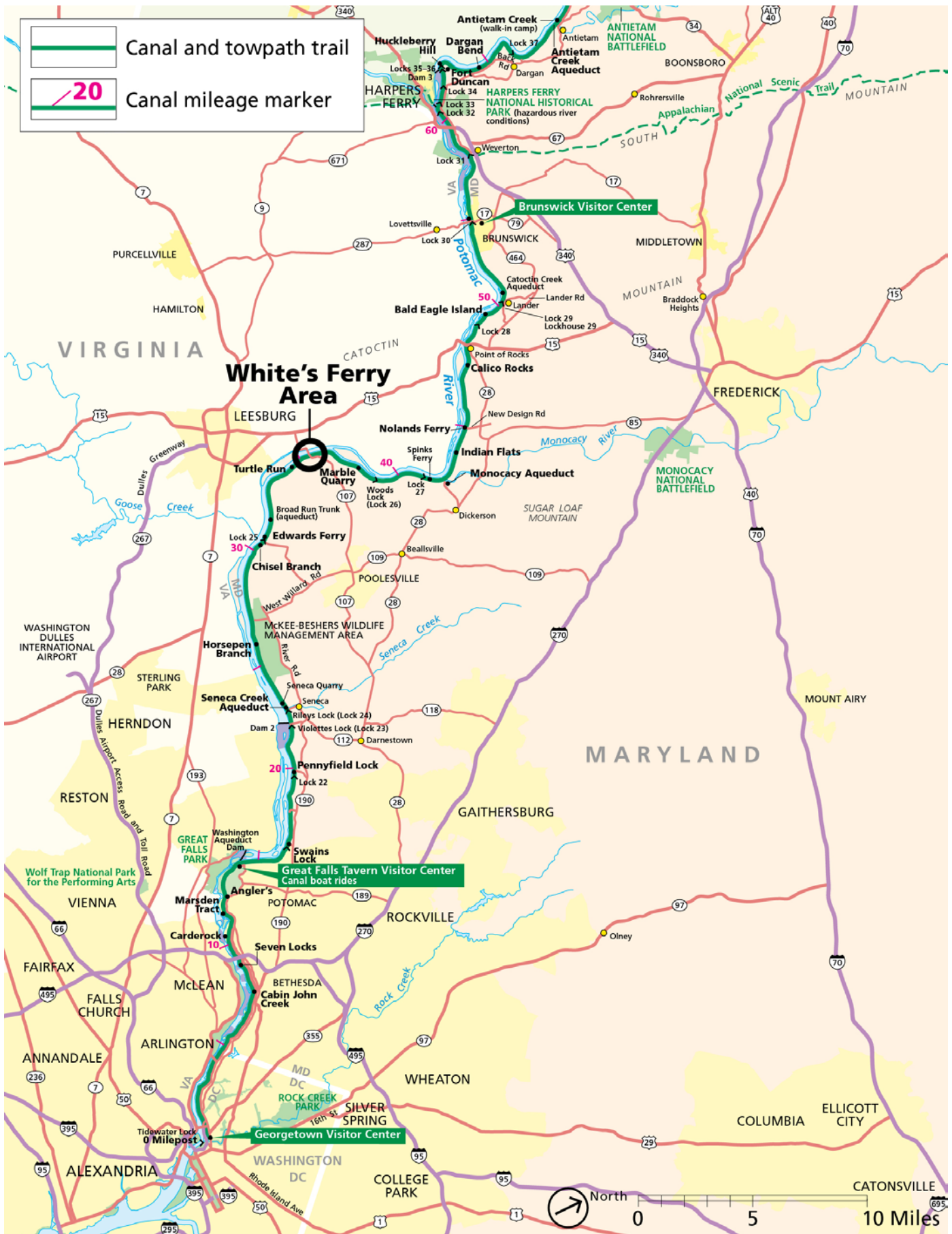
The White’s Ferry Area Development Concept Plan (Concept Plan) presents ideas for the future development and uses of the White’s Ferry area.

## PROJECT BACKGROUND

The White’s Ferry area came under the jurisdiction of the NPS in the early 1970s. The NPS acquired Tract 17-102 in 1972 from the Royal Atlas Corporation, followed by the acquisition of Tract 17-101 in 1974 from the White’s Ferry Sportsman Club (“the Club”). The NPS acquired Tract 17-101 through a deed that reserved in the Club certain rights of use and occupancy of the tract for a period of 25 years. The Club had continuously occupied the tract from before 1974 to 2021. The NPS now has the opportunity to holistically explore new future public uses of the north tract, which traditionally had been more accessible to the general public, and the south tract, which until recently had been exclusively occupied by a private organization. The south tract currently has 22 cabins formerly used for recreation that the NPS will be removing.

As identified in the *C&O Canal National Historical Park Foundation Document (2013)*, the park purpose (i.e., the specific reason(s) for establishment of the park) is to preserve and interpret the 19th century transportation canal from Washington, D.C., to Cumberland, Maryland, and its associated scenic, natural, and cultural resources; and to provide opportunities for education and appropriate outdoor recreation. The C&O Canal National Historical Park is significant for the following reasons (NPS 2013):

- The C&O Canal National Historical Park preserves and interprets 19th century canal transportation, civil engineering technology, and the evolution of a flat water transportation system in support of the industrial growth of the nation.
- The C&O Canal National Historical Park contains more than 1,300 historic structures, including one of the largest collections of 19th century canal features and buildings in the national park system.



**Figure 1.** White's Ferry Area Location within the C&O Canal National Historical Park

Note: The figure above is adapted from the NPS C&O Canal National Historical Park map available at <https://www.nps.gov/media/photo/collection-item.htm?pg=7347320&cid=305fb7af-a71b-469b-941e-a98b439c882f&id=c7af6f6c-a34b-4424-9481-0de17890c5a6&sid=0098410533b04e068248fd40c52101c1&p=1&sort=relevance>

- The C&O Canal National Historical Park preserves archeological evidence of 13,000 years of human habitation along the Potomac River.
- Through preservation efforts that began in the 1950s, the C&O Canal National Historical Park towpath was transformed into one of the most heavily used recreational trails in the nation and serves as the backbone for national and regional trail systems.
- The C&O Canal National Historical Park provides diverse recreational opportunities for millions of visitors annually, including numerous access points to the Potomac River, ranging from urban to rural settings.
- The 15-mile-long Potomac Gorge, managed in part by the C&O Canal National Historical Park, is one of the most biologically diverse natural areas in the national park system.
- Paralleling the Potomac River for 184.5 miles and traveling through four physiographic provinces, C&O Canal National Historical Park provides a natural buffer of forest, woodlands, prairies, and barrens and a wildlife corridor along the second-largest tributary to the Chesapeake Bay.
- Interpretive and educational opportunities engage a diverse cross section of urban and rural communities along the length of the C&O Canal National Historical Park and were envisioned in the park's enabling legislation.

## PLANNING GOAL

The Concept Plan provides conceptual management options for the future of the White's Ferry area. At the beginning of the planning process, the NPS developed the goal for the Concept Plan to explore and identify future public uses of the White's Ferry area that:

- Expand public access to the White's Ferry area and provide new recreation opportunities
- Respect the site's location within the 100-year floodplain and ecological context along the Potomac River

- Offer compatibility with neighboring private properties
- Reflect realistic expectations for what the NPS can provide, manage, and maintain when planning for visitor use

## PUBLIC & STAKEHOLDER ENGAGEMENT PROCESS

The NPS provided multiple opportunities for public and stakeholder participation in the development of the Concept Plan. The NPS solicited input from the public and stakeholders at the beginning and middle of the planning process to learn about the public's vision for the White's Ferry area and receive feedback on the Concept Plan options.

### Public Comment Period 1

The NPS held a 30-day public comment period (May 11, 2022 – June 11, 2022), including one virtual public meeting. This comment period provided an opportunity for the public to help shape a long-term vision for the White's Ferry area, provide feedback on an initial range of concepts, and identify any issues, concerns, or ideas they might have with respect to the project. During the virtual public meeting on May 11, 2022, the NPS reviewed the project background, existing conditions, considerations and constraints, and the park's purpose and significance. The NPS also presented and asked attendees to share their thoughts on an initial range of concept options for the north and south tracts of the White's Ferry area. The north concept options provided an improved forest buffer, changes to the existing pavilion, and options for the existing area east of the pavilion, including agricultural use, open gathering area for informal recreation, and a meadow. The south concept options provided choices for group camping sites, parking, pavilion(s), open or shaded group gathering space, river access, and trail connections to the C&O Canal Towpath. Approximately 24 attendees, including NPS staff and consultant representatives, participated in the virtual public meeting.

Additional information about Public Comment Period 1, including a summary of comments received, is available in **Appendix A**.

## Public Comment Period 2

The NPS held a second 30-day public comment period (October 12, 2022 - November 12, 2022), including one virtual public meeting, to present revised concept options for the White's Ferry area. The Concept Plan options considered the comments received during the first public comment period. Approximately 16 attendees, including NPS staff and consultant representatives, participated in the October 12th virtual public meeting.

The NPS considered the comments received during the second public comment period in preparation of the Concept Plan included in this document. Additional information about Public Comment Period 2, including a summary of comments received, is available in **Appendix A**.

## Compilation of Comments

NPS staff worked with consultants to compile all comments submitted at the public meetings, via mail, or via the NPS Planning, Environment, and Public Comment (PEPC) website during the public comment periods. Eleven and eight pieces of correspondence regarding the Plan were recorded during Public Comment Periods 1 and 2, respectively. The comments covered a wide range of topics, as summarized below:

- Support for the proposed Plan concepts
- Concerns about or opposition to the proposed Plan concepts
- New ideas for the proposed Plan concepts
- Request for more details, including project funding and implementation schedule; pavilion repairs and rental use on the north tract; and camping and campsite amenities on the south tract
- Comments unrelated to the Plan (i.e., operation of the White's Ferry river crossing)

NPS staff made the final determinations about the recommendations in this Concept Plan based on applicable laws and policies; comments made by the public and stakeholders; the park's purpose, significance, environmental integrity, and historic landscapes; and the project objectives. The NPS considered several new ideas for the proposed Plan concepts recommended during the public and stakeholder engagement process. New ideas that were not incorporated in this Concept Plan, and the reasons why those ideas were dismissed, are expanded upon in the **Ideas Considered but Dismissed** section of the **Concept Plan Recommendations** chapter.

## DETERMINATION OF PREFERRED CONCEPT

The Concept Plan is conceptual and is not a decision document. The Concept Plan is the first step in the overall decision-making process for the future of the White's Ferry area. The Concept Plan provides recommendations for the NPS to consider when future proposals and decisions are being made. Potential concepts proposed in this Concept Plan would be further developed and analyzed for their potential to impact the human and natural environment. Furthermore, implementation may occur over time as funds become available.

A preferred concept, which could include a combination of improvements mixed-and-matched from different concepts, would be identified in the future through additional public and stakeholder engagement and the environmental and historical preservation compliance processes.

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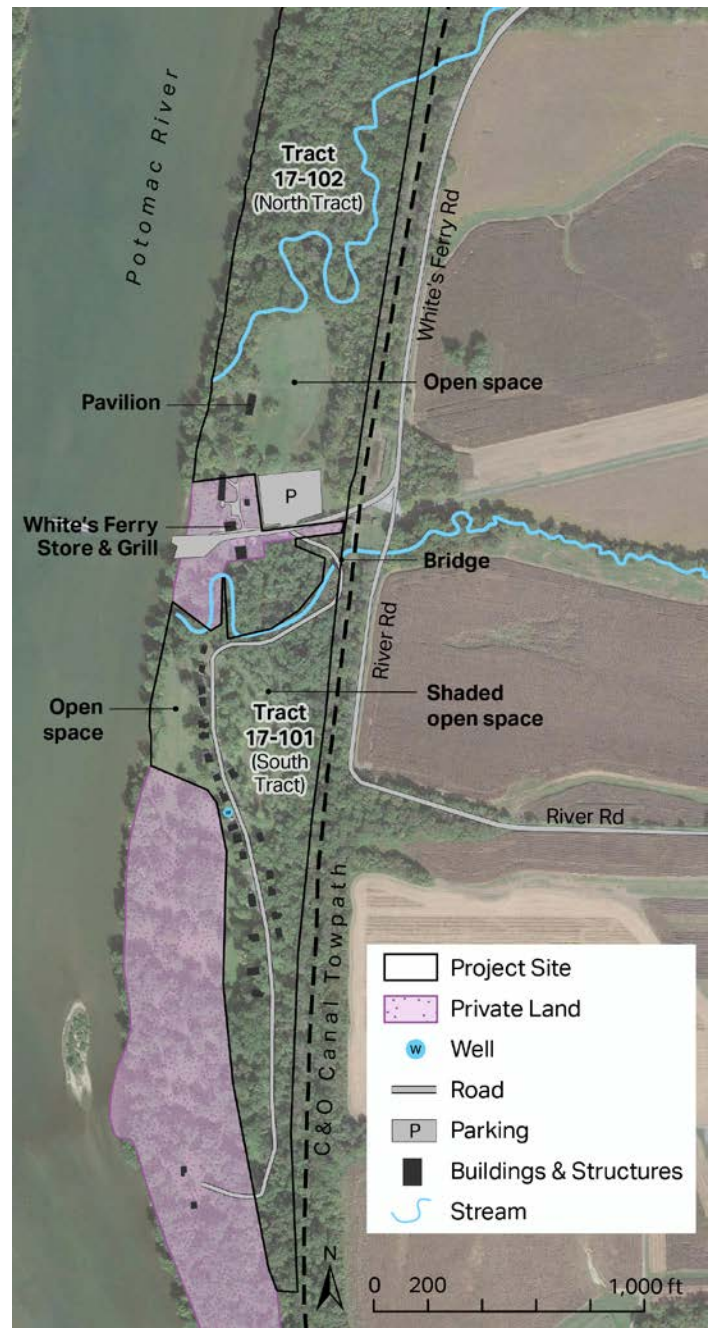
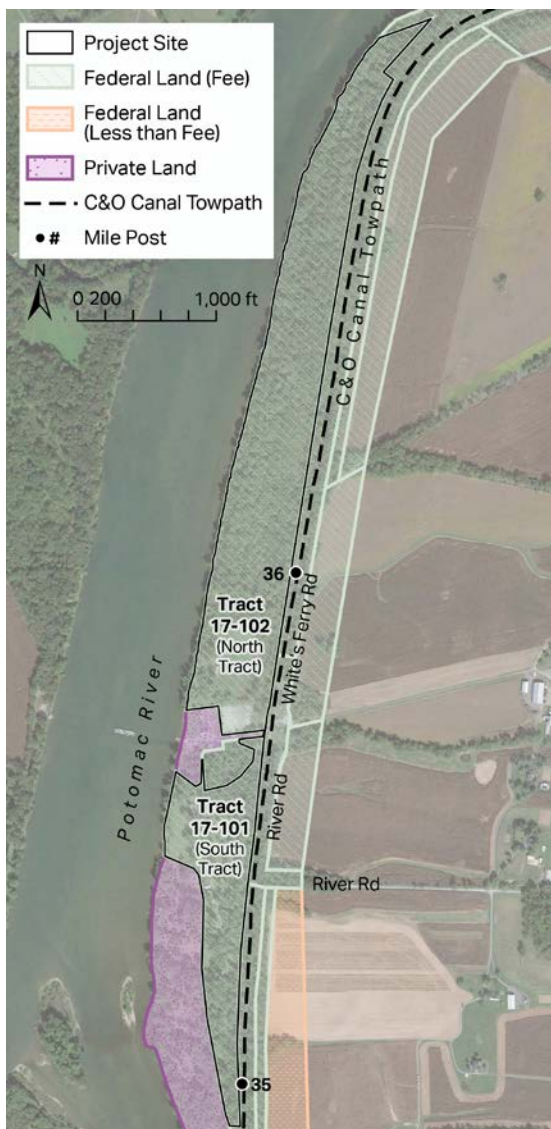


**North Tract – Parking Lot with Open Field and Pavilion in the Background (2021)**

# CURRENT CONDITIONS

The White's Ferry area consists of two oblong riverfront tracts with forested areas and open spaces set within a rural landscape. Directly to the east of the White's Ferry area and White's Ferry Road is Federal property that is part of NPS's agricultural leasing program. Farther east is private property used for agricultural purposes.

While Tract 17-102's grounds contain visitor amenities that are open during daylight hours and frequently used by the public, the NPS has made no improvements to Tract 17-101 since acquiring it. Until recently, the tract has not been open to the public. In this document, the "north tract" is used to reference Tract 17-102 and the "south tract" is used to reference Tract 17-101.



**Figure 2. Existing Conditions**

*Note: Property boundaries are only identified in the figure above for tracts within the C&O Canal National Historical Park.*



**Figure 3.** View looking east along White's Ferry Road of the North and South Tract Entrances (2021)



## EXISTING FEATURES & VISITOR USE

### North Tract

The approximately 54-acre north tract is a predominately forested landscape with a few visitor amenities at the southern end of the tract that are generally used during daylight hours. A large unpaved and heavily used parking lot provides parking for visitors using the pavilion, picnicking or boating along the Potomac River, patronizing the White's Ferry Store & Grill, and hiking and cycling along the C&O Canal Towpath. A bike rack and three interpretive displays are located along the south and north edges, respectively, of the parking lot.

To the north of the parking lot is a shaded estimated 34 feet by 36 feet concrete pad, open field, and pavilion. The roughly 3.1-acre field is

mowed generally twice per year. The approximately 24 feet by 76 feet pavilion provides a shaded space that could be used for gatherings such as birthday parties, weddings, and baptisms (NPS 2021a). The NPS does not actively manage uses at the pavilion. Vehicle access to the east side of the pavilion appears to be provided via a driveway on the private property where the White's Ferry Store & Grill is located.

The southern end of the tract is predominately flat. The area's topography rolls downward east to west through shaded open space between the pavilion and the Potomac River. Tree-filtered views of the Potomac River are available from the shaded open space, pavilion, and field.

The remaining area of the north tract is forested with no visitor improvements. A stream that drains to the Potomac River is located north of the field.



**Figure 4.** North Tract - Concrete Pad, Interpretive Displays, and Parking Lot (2021)



**Figure 5.** North Tract - Pavilion and Open Field (2021)



**Figure 6.** North Tract - Open Field (2021)



**Figure 7.** North Tract - Driveway providing Vehicle Access to the Pavilion (2021)



**Figure 8.** North Tract - Shaded Open Space between the Pavilion and the Potomac River (2021)



**Figure 9.** North Tract - View from the Pavilion towards the Potomac River (2021)

## South Tract

The approximately 19-acre south tract is also predominately wooded and contains 22 cabins formerly used for recreation linearly arranged along a one-lane unpaved access road. The entrance to the south tract is along White’s Ferry Road opposite the north tract’s parking lot entrance. The entrance is gated with a large sign incorrectly noting the property is private and trespassing is not allowed. No NPS signage is present. The access road continues south crossing a stream draining from the C&O Canal into the Potomac River and eventually provides vehicle access to a private property located adjacent to the west of the south tract.

In the northern portion of the site, shaded open space is available east of the access road. The row of cabins along the west side of the access road form the western edge of a plateau across the tract eastward. To the west of the access road, the elevation decreases to an approximately 1.2-acre

terraced open space between the cabins and the Potomac River. Filtered views are available from the northern portion of the tract through trees lining the Potomac River shoreline.

Additional structures within the south tract include 22 pit latrines (outhouses), a pump house for a well that supplies non-potable water to the cabins, a few sheds and outbuildings, a few wooden docks on the Potomac River, and a few brick outdoor chimneys associated with picnic tables and patios. The exact construction dates are unknown, but most of the cabins seem to have been constructed between 1949 and 1972 (NPS 2021b).

A drainage swale running from northwest to southeast forms the southwestern boundary of the south tract. This drainage feature appears to have been an actual creek at one time; however, it has largely been silted in through flooding at the northern end (Chief of Lands, NCRO 2015).



**Figure 10.** South Tract – Entrance (2021)



**Figure 11.** South Tract – Access Road (2021)



**Figure 12.** South Tract – Shaded Open Space (2021)



**Figure 13.** South Tract – Open Space Terrace adjacent to the Potomac River (2021)



**Figure 14.** South Tract – Potomac River Access (2021)



**Figure 15.** South Tract – Drainage Swale separating the South Tract from Private Property (2021)

## NEARBY RECREATION OPPORTUNITIES

The White's Ferry area is located at approximately the 35.5 mile marker of the 184.5-mile long C&O Canal. The C&O Canal National Historical Park offers numerous recreation opportunities for hiking, biking, camping, and access to the Potomac River. The C&O Canal Towpath runs parallel to the east side of the White's Ferry area. The Towpath is a 12-foot-wide, mostly hard-packed dirt trail that parallels the C&O Canal from Cumberland, Maryland to Washington DC. The Towpath provides uninterrupted non-motorized (i.e., hiking and bicycle riding) access to the entire length of the park, connecting visitors to historic structures, the natural environment, and many other experiences along the canal. Horseback riding is also permitted on the Towpath from mile 16.6 to mile 181.8 (NPS 2013, 2018).

The Potomac River adjacent to the White's Ferry area offers opportunities for fishing and motorized and non-motorized boating. The private property located between the north and south tracts provides a boat ramp, picnic tables, restrooms, and a general store (i.e., White's Ferry Store & Grill). Non-motorized boats can also be launched from the private property's access to the Potomac River. Fishing is allowed in the Potomac River with a valid license from the Maryland Department of Natural Resources.

The closest hiker-biker campsites to the White's Ferry area are located an estimated 2.7 miles upstream and 1.2 miles downstream along the Towpath at Marble Quarry and Turtle Run, respectively. The hiker-biker campsites are first-come, first-serve with no fee. The campsites are primitive with a chemical toilet, a picnic

table, grill, and water available mid-April through mid-November.

The closest drive-in campground to the White's Ferry area is located approximately 34.1 miles upstream along the Towpath at Antietam Creek. The Antietam Creek campground has 20 single campsites with a picnic table, fire ring, and grill. Pit and chemical toilets are available. Potable water is also available, except potentially during the cold winter months. Only tents are allowed at the campground (i.e., no RVs or trailers). The campground is by reservation only and requires a fee. Eight people maximum are permitted per site. In 2021 and 2022, the Antietam Creek campground had a total of 8,804 and 8,203 tent overnight stays, respectively.

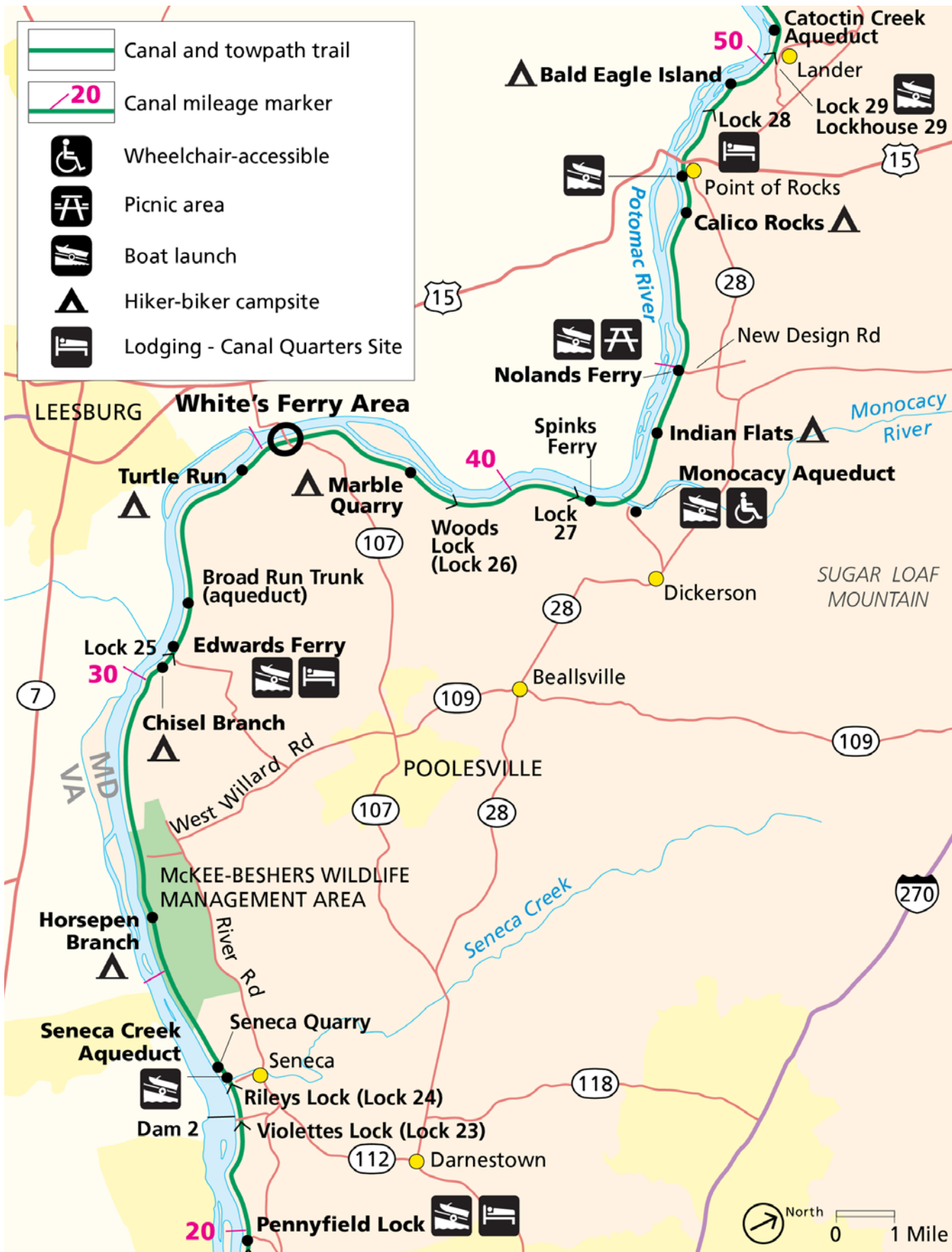
The closest group campground to the White's Ferry area is located approximately 24.5 miles downstream along the Towpath at the Marsden Tract. The Marsden Tract campground has six group campsites, which each accommodate up to the 30 campers. Only tents are allowed at the campground. Each campsite has a picnic table and a fire ring. Portable toilets are available. Potable water is also available, expect potentially during the cold winter months. Access to the campground is by foot only. In 2021 and 2022, the Marsden Tract campground had a total of 8,146 and 7,433 group overnight stays (NPS 2018, 2022, 2023a, 2023b).

Besides visitor use facilities within the C&O Canal National Historical Park, no other Federal, state, county, or local park facilities are located within three miles of the White's Ferry area on the Maryland side of the Potomac River.



**Figure 16.** View looking north along the C&O Canal Towpath towards White's Ferry Road (2021)





**Figure 17.** Camping and Other Recreation Opportunities along the C&O Canal National Historical Park near the White's Ferry Area

Note: The figure above is adapted from the NPS C&O Canal National Historical Park map available at <https://www.nps.gov/media/photo/collection-item.htm?pg=7347320&cid=305fb7af-a71b-469b-941e-a98b439c882f&id=c7af6f6c-a34b-4424-9481-0de17890c5a6&sid=0098410533b04e068248fd40c52101c1&p=1&sort=relevance>

## POLICIES, PARK MANAGEMENT, & OPERATIONS

Several policies and documents, ranging from national laws to park-specific plans, guide the management and operation of the C&O Canal National Historical Park and accordingly, the White’s Ferry area. The overall policies, laws, regulations, and NPS Director’s Orders (DO) that govern the White’s Ferry area’s management and operations are outlined in **Table 1**.

**Table 1.** Summary of Policies and Planning Guidance for the White’s Ferry Area

Policies and Guidelines	Summary
<p><b>Public Law 91-664 (1971)</b></p>	<p>Established the C&amp;O Canal National Historical Park “to preserve and interpret the historic and scenic features . . . and develop the potential of the canal for public recreation.”</p>
<p><b>C&amp;O Canal National Historical Park Foundation Document (2013)</b></p>	<p>Provides basic guidance for planning and management decisions. Fundamental resources and values for the park that are relevant to the White’s Ferry area include historic districts, historic structures, and archeology; the towpath; scenic views; recreational opportunities; and interpretation and education. Park interpretive themes that are relevant to the White’s Ferry area include:</p> <ul style="list-style-type: none"> <li>• <b>Human Ingenuity:</b> The C&amp;O Canal is a testament to human ingenuity and capacity to build an enduring transportation system that challenged natural obstacles, creating communities, connecting regions, and advancing European American expansion.</li> <li>• <b>Transportation Heritage:</b> The C&amp;O Canal plays a vital role in the nation’s transportation heritage—a catalyst for westward expansion and economic development—shaping industry, culture, recreation, and tourism for generations.</li> <li>• <b>Life on the Canal:</b> Life on the C&amp;O Canal during its construction and operation was fraught with challenges and life-threatening hazards in pursuit of uncertain rewards.</li> <li>• <b>Change and Adaptation:</b> The prehistory and history of the Potomac Valley illustrates and reflects constant change and adaptation—the river’s impact on land, nature, and cultures within the valley, and the interaction between the cultures and their impact on the river valley.</li> <li>• <b>Geology and Geography:</b> The unique convergence of geology and geography in the Potomac River Valley inspires a sense of awe and humility.</li> <li>• <b>Place of Refuge:</b> The C&amp;O Canal is a place of refuge from the modern world—a setting where one can be spiritually renewed and reconnected to past generations and the natural world.</li> </ul>

Policies and Guidelines	Summary
<p><b>C&amp;O Canal National Historical Park Long-Range Interpretive Plan (LRIP) (2010)</b></p>	<p>Defines the overall vision and long-term (7-10 years) interpretive goals of the park. The LRIP does not identify anything specific to the White’s Ferry area of the park. However, the LRIP outlines the following desired visitor experiences that could be applicable to the White’s Ferry area:</p> <ul style="list-style-type: none"> <li>• Obtain basic information about the park and advice on what to visit.</li> <li>• Be alone and enjoy solitude and natural quiet.</li> <li>• Walk or bike the entire towpath in a natural/cultural environment with few visual distractions.</li> <li>• Find out about the people who built and operated the canal.</li> <li>• Experience the sights, sounds and adventure of the Potomac River.</li> </ul>
<p><b>C&amp;O Canal National Historical Park General Plan (1981)</b></p>	<p>Establishes an overall management philosophy for the park. The Plan divides the park into five management zones that range from complete restoration, with high density visitor activity, to remote natural areas with a very low density of visitor use. The White’s Ferry area is located in Zone B - Cultural Interpretive Zone, defined as containing historic resources that are not as accessible by road and do not have adequate parkland around them upon which to construct adequate visitation facilities. The Plan notes that the White’s Ferry area should be developed for day-use activity.</p>
<p><b>NPS Management Policies (2006)</b></p>	<p>Service-wide policies establishing a broad framework and prescribing parameters for management decisions. Key policy implications are included for natural resource management, cultural resource management, interpretation and education, visitor use, special park uses, park facilities, and commercial visitor services. Policies are also included for sustainable energy design for any facility development, whether it is a new building, a renovation, or an adaptive reuse of an existing facility.</p>
<p><b>NPS Campground Design Guidelines (2021)</b></p>	<p>Provides service-wide guidelines for the planning, design, maintenance, and operations of campgrounds.</p>

Policies and Guidelines	Summary
<p><b>2022 Superintendent’s Compendium C&amp;O Canal National Historical Park</b></p>	<p>Provides visiting hours, public use limits, and conditions or restrictions for specific uses and activities. Regulations that may be relevant to the White’s Ferry area include:</p> <ul style="list-style-type: none"> <li>• Closure of sections of the Park for forecasted flooding</li> <li>• Activities requiring special use permits or permitting instruments (e.g., special events, camping at hiker/biker sites by trail rider groups, weddings)</li> <li>• Camping, including group camp site locations, and hiker/biker sites</li> <li>• Firewood use</li> <li>• Picnicking</li> </ul>
<p><b>36 CFR Part 2 – Resource Protection, Public Use and Recreation</b></p>	<p>Includes regulations regarding picnicking, special events, fishing, camping, fires, sanitation and refuse, and recreation fees:</p> <ul style="list-style-type: none"> <li>• Picnicking is allowed. The superintendent may establish conditions for picnicking.</li> <li>• Special events are allowed, provided that there is a meaningful association between the park area and the events, the observance contributes to the visitor understanding of the significance of the park area, and a permit has been issued by the superintendent.</li> <li>• Fishing is allowed. Certain fishing activities are prohibited.</li> <li>• The superintendent may require permits, designate sites or areas, and establish conditions for camping.</li> <li>• Lighting or maintaining a fire in designated areas or receptacles and under conditions that may be established by the superintendent is allowed. Restrictions apply.</li> <li>• Recreation fees are allowed in accordance with Part 71.</li> </ul>
<p><b>36 CFR Part 5 – Commercial and Private Operations</b></p>	<p>Commercial operations within the park require permits.</p>

Policies and Guidelines	Summary
<b>36 CFR Part 18 – Leasing of Properties in Park Areas</b>	Identifies what historic property may be leased, limitations on the use of historic property leased, how lease proposals are solicited and selected, lease length, and lease provisions.
<b>36 CFR Part 51 – Concession Contracts</b>	Covers the solicitation, award, and administration of concession contracts. Concession contracts are allowed to provide visitor services in park areas when they comply with requirements of this part.
<b>National Capital Region Invasive Plant Management Plan and Environmental Assessment (2015)</b>	Ensures that all National Capital Region parks, including the C&O Canal National Historical Park, have access to a range of methods used for the treatment of non-native invasive plant species. Such methods include chemical, biological, manual, mechanical, physical, and cultural treatments.
<b>National Environmental Policy Act (NEPA), 1969, as Amended</b>	Provides the tools to implement intended goals by requiring that every Federal agency prepare a study of the impacts of “major Federal actions having a significant effect on the environment and alternatives to those actions.” It requires that each agency make that information an integral part of its decisions. NEPA also requires that agencies make a diligent effort to involve the interested and affected public before they make decisions affecting the environment.
<b>National Historic Preservation Act (NHPA), as amended through 2000</b>	Protects buildings, sites, districts, structures, and objects that have significant scientific, historic, or cultural value. The act established affirmative responsibilities of Federal agencies to preserve historic and prehistoric resources.
<b>Archeological Resources Protection Act (ARPA), 1979</b>	Preserves the archeological resources that are key to the history of America.
<b>Architectural Barriers Act Accessibility Standards (ABAAS)</b>	Standards guiding design to provide universal access for people of all ages and backgrounds to play areas, trails, picnic and camping facilities, fishing piers and platforms, viewing areas, and other components of outdoor developed areas on Federal sites when newly built or altered.
<b>Endangered Species Act (ESA), 1973</b>	Provides a program for the conservation of threatened and endangered plants and animals and the habitats in which they are found.

Policies and Guidelines	Summary
<b>Nongame and Endangered Species Conservation Act, 1975</b>	Primary Maryland law that governs the legal listing of threatened and endangered species. Code of Maryland Regulations 08.03.08, which supports the Act, includes the species and lists prohibited activities.
<b>Executive Order 11988 – Floodplain Management</b>	Directs Federal agencies to reduce the risk of flood loss; minimize the impacts of floods on human safety, health, and welfare; restore and preserve the natural and beneficial values served by floodplains; and avoid direct or indirect support of floodplain development wherever there is a practicable alternative. DO-77-2: Floodplain Management, which is described later in this table, is NPS' means of complying with Executive Order 11988.
<b>Executive Order 11990 – Protection of Wetlands</b>	Directs Federal agencies to minimize the destruction, loss or degradation of wetlands; preserve and enhance the natural and beneficial values of wetlands; and avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. DO-77-1: Wetland Protection, which is described later in this table, is NPS' means of complying with Executive Order 11990.
<b>DO-6: Interpretation and Education</b>	Sets forth operational policies and procedures necessary to maintain effective, high-quality interpretive and educational programs.
<b>DO-12: Conservation Planning, Environmental Impact Analysis, and Decision-Making</b>	Directs the way the NPS complies with NEPA, including all aspects of environmental analysis, public involvement, and resource-based decisions.
<b>DO-20: Agreements</b>	Establishes NPS policies and procedures for administering agreements and identifies the types of agreements NPS may enter.
<b>DO-22: Recreation Fees</b>	Sets forth policies and procedures for administering a fee program.
<b>DO-28: Cultural Resource Management</b>	Provides guidelines for the management of cultural resources, including cultural landscapes, archeological resources, historic and prehistoric structures, museum objects, and ethnographic resources.
<b>DO-28A: Archeology</b>	Promotes a common management framework for planning, review, and undertaking archeological activities and other activities that may affect archeological resources within the NPS.

Policies and Guidelines	Summary
<b>DO-42: Accessibility for Visitors with Disabilities</b>	Establishes a framework for the effective implementation of actions necessary to achieve the highest level of accessibility that is reasonable.
<b>DO-52C: Park Signs</b>	Establishes and implements standards for the planning, design, fabrication, installation, inventory, and maintenance of outdoors signs for national parks.
<b>DO-53: Special Park Uses</b>	Sets forth policies and procedures for administering special park uses.
<b>DO-77: Natural Resource Protection</b>	Provides information necessary to design, implement, and evaluate a comprehensive natural resources management program.
<b>DO-77-1: Wetland Protection</b>	Establishes policies, requirements, and standards to protect and preserve wetlands.
<b>DO-77-2: Floodplain Management</b>	Establishes procedures for implementing floodplain protection and management actions.

# OPERATIONAL, MAINTENANCE, & ENVIRONMENTAL CHALLENGES

The planning for the White’s Ferry area presents new opportunities for visitor experiences and the treatment of park resources. However, the condition of existing buildings, structures, utilities, and vegetation; the presence of cultural resources; and the area’s history of flooding present challenges. The following items summarize some of the issues and obstacles facing the concepts proposed in this Concept Plan. (Note that this is not intended to be an exhaustive list of resources present at the White’s Ferry area; instead it is included to provide an outline of the challenges in implementing the proposed concepts and managing the White’s Ferry area.)

Resources that could potentially be affected and the associated environmental consequences, or “impacts” of Concept Plan implementation on those resources, would be identified in the future through the National Environmental Policy Act (NEPA) process. Where appropriate, the NEPA process would also identify mitigation measures for adverse impacts and avoid significant adverse impacts.

Historic properties and the potential for adverse effects on historic properties as a result of Concept Plan implementation would be identified in the future through the National Historic Preservation Act (NHPA) process. Where appropriate, the NHPA process would also seek to avoid, minimize, and mitigate potential adverse effects.

## Buildings & Structures

### North Tract

In 2021, the NPS conducted a condition assessment of the pavilion. The assessment found that the pavilion’s metal roofing is in good condition, but the nails holding down the sheets of roofing have backed out and weatherproofing bumpers are missing. If the pavilion is retained, the roof would require repairs before any strong winds cause damage to it. Additional issues, some more urgent than others, should also be completed to preserve the pavilion (NPS 2021a).

Prior to the NPS’s acquisition of the north tract in 1972, several recreational types of improvements were constructed on the north tract between 1966 and 1970. These improvements included cabins, a toilet building, snack bar, bath house, swimming pool, mechanical building, storage shed, and approximately 38 camp sites with well and water lines nearby (Lamb 1972). In June 1972, the entire property suffered severe flood damage from the overflowing Potomac River as a result of Hurricane Agnes. The hurricane destroyed or left all improvements on the north tract in poor or derelict condition. Although the above ground structures are no longer present, it is unclear if and what subsurface remnants of these improvements are present on the north tract today.

### South Tract

As of October 2021, all buildings and structures as described earlier in this chapter were still present. These buildings and structures are scheduled for demolition.

The weight limit of the existing bridge along the access road that crosses the south tract’s stream is unknown. The bridge needs to be evaluated for if it can accommodate heavy vehicles, the heaviest being emergency and service vehicles.



**Figure 18.** South Tract – Bridge (2021)



## Utilities

### North Tract

An electrical feed and utility pole on the north side provide electrical access from a private property. The 2021 NPS condition assessment of the pavilion found that some electrical equipment does not meet International Building Code (IBC) electrical code. The assessment recommended repairing the electrical system before the pavilion is used due to safety issues.

Water is provided from a well head and hand pump on the north side of the pavilion (NPS 2021a). The status of the water system (e.g., registered with the State of Maryland, potable vs. non-potable) is unknown.

The north tract has no sewer.

### South Tract

Overhead power lines run parallel along the east side of the access road and provide electricity to the south tract and the private property located adjacent to the west of the south tract.

In 2015, the NPS conducted an exterior site inspection of the south tract where electrical equipment and wiring was found to not meet IBC electrical code. Most of the structures were found to have electrical code violations. Several hazardous trees were identified that need to be removed to prevent damage to power lines and potential for downed live electrical wires.

The south tract's water system consists of a well, storage tank, pumphouse, and a series of yard hydrants located between each cabin. The well is located above the floodplain, but sits in an area



**Figure 19.** North Tract - Electrical Feed, Utility Pole, and Handpump

that is still subject to flooding. At the time of the 2015 NPS site inspection, the water system was not registered with the State of Maryland as a Public Water System. A public water system is a system for the provision to the public of water for human consumption through pipes or other constructed conveyances if such system has at least 15 service connections or regularly serves at least 25 individuals. The water source could not be determined safe and/or sanitary. Site inspectors recommended water quality testing to determine how the well should be classified and dictate the type of ongoing monitoring and additional water treatment.

The south tract has no sewer (Chief of Lands, NCRO 2015; National Trails, Lands, Resources Program Center 2003).



**Figure 20.** South Tract – Overhead Power Lines



**Figure 21.** South Tract – Pump House (2021)

## Environmental Concerns

### North Tract

A 1972 appraisal noted that the north tract contained four holding tanks for the septic system. Some of these tanks were said, according to County records, to be unauthorized construction built without building permits (Lamb 1972). It is unknown if these tanks are still present on the north tract today.

### South Tract

The 2015 NPS site inspection identified numerous potential risks to human health and safety and natural resources. Wastewater and human waste were being improperly disposed of. Violations of various applicable National Fire Protection Association (NFPA) codes were observed. Evidence of leakage from two above ground storage tanks was present. Hazardous substances, petroleum, or wastewater may be leaching or improperly discharging into the groundwater, Potomac River, and wetlands (Chief of Lands, NCRO 2015).



A 2003 site inspection identified dump sites at the southern end of the south tract and adjacent to the north border of the south tract. All cabins had septic fields, which occurred within the 50-year floodplain. Four of the 16 interior and exterior paint samples collected from the cabin interiors and exteriors contained enough Lead to be defined as Lead-based paint under Federal guidelines. Two of 33 samples collected from the cabin interiors and exteriors for asbestos testing contained asbestos (National Trails, Lands, Resources Program Center 2003).

### Vegetation

The existing vegetated riparian buffers along the riverbank and creek drainages in the north tract and south tract are narrow. The lack of riparian vegetation along the riverbank and creek drainages reduces the site's natural capacity to infiltrate and/or modulate storm water and flooding.

Several large trees interspersed through the south tract were observed to be dead, dying, or diseased during the 2015 NPS site inspection. These trees pose safety and health dangers due to their likely potential to break and/or fall. The risk of trees toppling or breaking is high, especially given the floodplain environment with loose silty soils and forces such as flooding, wind, rain, and freezing. Several native trees were also observed to be damaged by hardware permanently fastened to them such as electrical conduits, lighting fixtures, or signs, or girdled by wire or chain (Chief of Lands, NCRO 2015).

**Figure 22.** South Tract – Electrical Equipment attached to a Tree (2021)

## Cultural Resources

The C&O Canal National Historical Park Historic District was listed in the National Register of Historic Places (NRHP) in 1979 (with a boundary expansion in 2015). This linear historic district extends from Georgetown in Washington, D.C. to Cumberland in western Maryland. The district encompasses approximately 20,500 acres and includes a 184.5-mile constructed waterway or canal that follows the District of Columbia/Maryland side of the Potomac River and numerous other historic resources. Within the White's Ferry area, contributing resources to the historic district include 19th century culverts, a bridge at White's Ferry, and mid-19th century granary ruins at White's Ferry.

The historic district also has a rich archeological record of human use and occupation as it has been inhabited for more than 11,000 years. Archeological sites are also present within the White's Ferry project area (NPS 2015).



## Water Resources

The White's Ferry area lies entirely within the 100-year floodplain and has been repeatedly flooded since at least 1972 (**Figure 23** to **Figure 25**) (FEMA 2018). As described earlier, Hurricane Agnes flooded both the north and south tracts in June 1972. The hurricane flooded all of the cabins on the south tract. High-water marks of notable floods in the White's Ferry area are documented on the White's Ferry Store & Grill.

Riverine wetlands are present along the White's Ferry area Potomac River shoreline and streams. Freshwater forested/shrub wetlands may also exist in the north tract. Formal wetland surveys would be necessary to delineate the presence of any existing wetlands prior to further design or construction (USFWS n.d.).

Erosion and the narrow width of existing riparian buffers along waterways are also of concern.

## Additional Potential Challenges

Additional challenges the park could face as a result of implementing the concepts proposed in this Concept Plan include:

- Law enforcement monitoring, which would affect campsite operations
- Administrative oversight, which would affect pavilion and campsite reservations, and leasing operations
- Maintenance needs, which could include mowing, vegetation maintenance, flood remediation, parking area maintenance, and toilet facility maintenance

**Figure 23.** Flood High-Water Marks on White's Ferry Store & Grill



**Figure 24.** Flooding in June 2018  
*Source: White's Ferry Store & Grill*



**Figure 25.** Existing Floodplains, Streams, and Rivers

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South Tract – Open Space adjacent to the Potomac River (2021)



# CONCEPT PLAN RECOMMENDATIONS

The White's Ferry area is re-imagined as a retreat along the Potomac River where new and improved amenities would provide opportunities for visitors to picnic, host events, gather or recreate informally, access the river for non-motorized boating, and enjoy a night under the stars within the C&O Canal National Historical Park. New vault toilets, upgraded water and electrical systems, and an improved parking lot would create a comfortable environment for day-use and overnight visitors of the White's Ferry area, as well as for those using the C&O Canal Towpath. Reforested areas and an improved riparian buffer would prevent or mitigate erosion and enhance the natural habitat, creating opportunities for visitors to enjoy viewing flora and fauna.

The White's Ferry area Concept Plan includes three concepts for the north tract and three concepts for the south tract. The concepts all involve building upon existing resources and installing new recreational amenities. The concepts also consider the carrying capacity of the park's facilities, infrastructure, and fiscal capacities, and provides recommendations to minimize the impacts to cultural and natural resources. New amenities, facilities, and infrastructure would be carefully situated and designed to avoid sensitive habitats, large tree removal, and archeological resources, as well as protect other resources identified in the future through the NEPA and NHPA processes as necessary.

For each north tract and south tract concept, this chapter describes the activity opportunities the concept would offer to visitors, followed by the improvements that would enable these activities. The activities and improvements identified in each concept could be implemented independently, or as part of a larger implementation strategy that crosses multiple concepts. In other words, the NPS could mix-and-match the activities and improvements outlined in these concepts to best meet the project goals. The north and south tract concepts are also interchangeable with one another. For example, North Concept A: Recreational could be paired with South Concept C: Dispersed.

Examples of organized activities identified in the concepts do not represent an exhaustive list, but rather identify the types of activities possible in select areas of the park. Activities would comply with all applicable NPS policies, laws, and regulations. It should also be noted that in accordance with *NPS Management Policies* (2006), "[a]ny facility development, whether a new building, a renovation, or an adaptive reuse of an existing facility, would include improvements in energy efficiency and reduction in greenhouse gas emissions for both the building envelope and the mechanical systems that support the facility" (NPS 2006: 126).

## FEATURES COMMON TO ALL CONCEPTS

The following features would be included in all north tract and south tract concepts.

- **Signage.** All concepts would include NPS signage placed at the vehicle entrance points of the north tract and south tract to clearly identify entrances to the park. Signage would also be placed at the new river access point proposed in the south tract concepts. Signage would include the C&O Canal National Historical Park name and a prominent display of the NPS arrowhead, which would increase public awareness of the park, designation as federal park land, and connection to the larger NPS system. The signs could include park hours, park rules, and the NPS National Capital Region dispatch contact number.
- **Newly planted vegetation.** All newly planted vegetation in the concepts would be native and non-invasive. Newly planted vegetation would need to be monitored and maintained over an initial period of time to ensure long-term viability. Temporary fencing around newly planted vegetation may be installed in order to prevent human trampling and increase the vegetation's chance of survival.

- **Vault toilets.** The north tract and south tract concepts propose locations for new vault toilets. Vault toilets do not require water, must be sized to handle the expected number of visitors, are generally less expensive to construct than flush toilets, and require periodic pumping. Because the entire White’s Ferry area lies within the 100-year floodplain, a survey will be needed to determine the feasibility of placement and if the seasonal high water table is at a depth that can support a vault toilet. The NPS could consider using a manual vault cap as a flood mitigation measure, but it must be manually installed before a flood event and is not recommended for parks where high visitor attendance coincides with flood seasons. The exact siting and orientation of the vault toilets would be designed in accordance with NPS best practices and the *NPS Campground Design Guidelines* (2021).
- Retention of the existing large unpaved **parking lot.** Curb stops would be added to define parking spaces and would accommodate vehicles towing boat trailers.
- No changes to the **predominately forested landscape** located north of the existing open field

## Concept A: Recreational

North Concept A: Recreational would provide sunny and shaded flexible space for picnics, gatherings such as birthday parties, socializing, and informal recreation. The concept could accommodate both a reserved group and individuals or informal smaller groups picnicking or using the flexible space.

The existing pavilion would be repaired and upgraded. The existing electrical equipment and water system at the pavilion would be upgraded to meet code (as necessary). The pavilion would be available for public use on a first-come, first-serve basis and/or through a recreation fee, reservation, and permit system, which could generate revenue for the NPS. An approximately 300 foot-long crushed stone path from the existing parking lot would lead to the pavilion.

A shaded area surrounding the pavilion and between the pavilion and the existing parking lot would provide additional picnic area options, filtered views of the Potomac River, and flexible space for informal recreation. The NPS would plant additional trees and install picnic tables in the space where the existing concrete pad is removed.

The existing open field to the east of the pavilion would provide a sunny flexible space (approximately one acre) for informal recreation. Regular mowing of the field would be required to maintain a comfortable environment available for visitor use.

## NORTH TRACT

The three concepts for the north tract include improvements that would provide a range of amenities and facilities available for public day use and enjoyment; additional wildlife habitat; more efficient parking; and varying maintenance needs. This section first describes features that are common to all three north tract concepts, followed by a description of features that are unique to each concept. This section concludes with a simple table summarizing the features proposed in each concept.

### Features Common to All Concepts

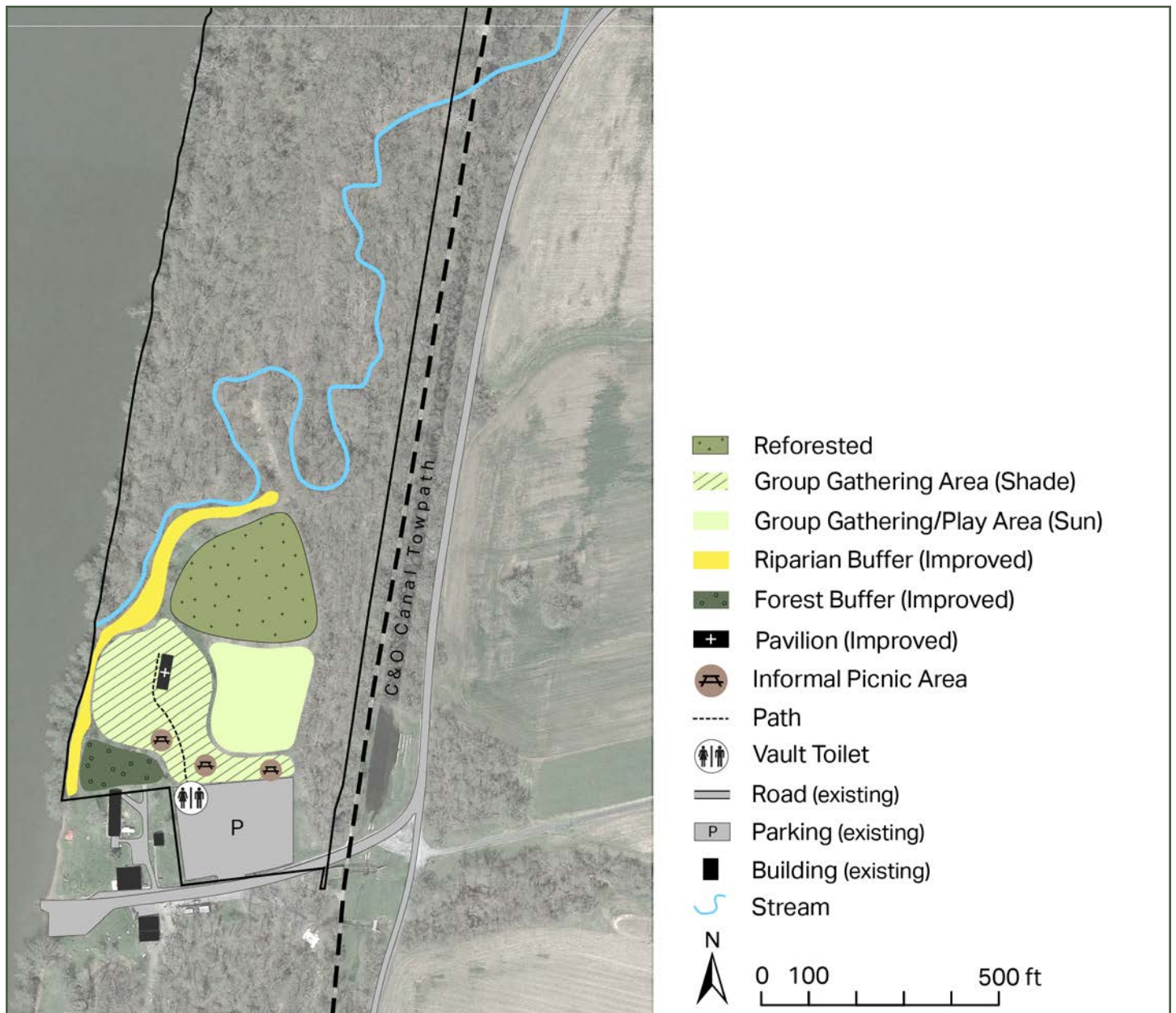
The north tract concepts would all provide the following:

- Changes to the **existing pavilion**
- Options for the **existing open field east** of the pavilion
- Removal of the existing concrete pad
- New and/or improved **forest buffer areas**

The north end of the existing open field would be reforested to expand the north tract's forested landscape. The southwest corner of the site would also be reforested to provide a vegetative buffer between the NPS property and the adjacent private property. In total, approximately 1.8 acres would be reforested. The riparian buffer along the Potomac River and the stream to the north of the pavilion would be improved to prevent or mitigate erosion.

At the north end of the parking lot, gate access to the open field would be provided for mowing and emergency vehicle use. Parking spaces would be arranged in a manner to maintain official vehicle access to the gate.

A vault toilet for public use would be added to the northwest corner of the parking lot. The vault toilet would be available for visitors utilizing the White's Ferry area and the C&O Canal Towpath. Therefore, a buffer free of vehicles would be maintained around the vault toilet to ensure maintenance vehicle access when needed.



**Figure 26.** North Concept A: Recreational



Existing conditions



**Figure 27.** North Concept A: Recreational – Example of Future Informal Picnic Area and Group Gathering/Play Area with the Improved Pavilion in the Background

## Concept B: Ecological

North Concept B: Ecological would provide shaded flexible space for picnics, gatherings such as school field trips, socializing, and informal recreation, as well as opportunities for learning about the site's ecology and history. The concept could accommodate both a reserved group and individuals or informal smaller groups picnicking or using the flexible space.

The existing pavilion would be repaired and upgraded. The existing electrical equipment and water system at the pavilion would be upgraded to meet code (if necessary). The pavilion would be available for public use on a first-come, first-serve basis and/or through a recreation fee, reservation, and permit system, which could generate revenue for the NPS. An approximately 300-foot long crushed stone path from the existing parking lot would lead to the pavilion.

A shaded area surrounding the pavilion and between the pavilion and the existing parking lot would provide additional picnic area options, filtered views of the Potomac River, and flexible space for informal recreation. The NPS would plant additional trees and install picnic tables in the space where the existing concrete pad is removed.

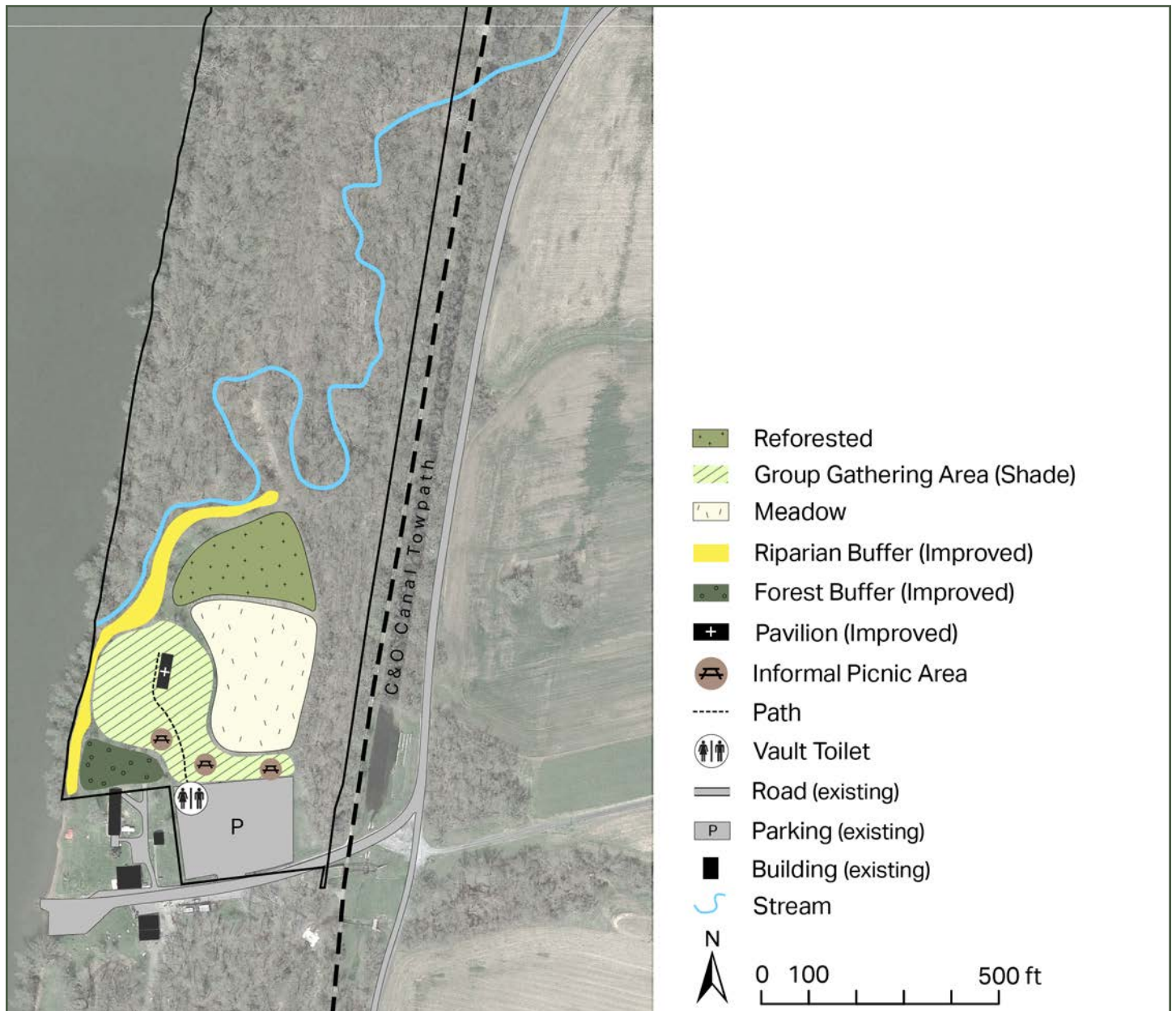
The existing open field to the east of the pavilion would be converted to an approximately 1.5-acre meadow to provide additional wildlife habitat and ecological education opportunities. Mowing would occur, at a frequency to be determined in the future, to maintain the meadow and prevent the establishment of woody plants and noxious weeds. Interpretive signage would also be installed to educate visitors about local ecology and history (e.g., C&O Canal). Signage would be consistent with the following interpretive themes identified in the *C&O Canal National Historical Park Foundation Document* (2013):

- **Human Ingenuity:** The C&O Canal is a testament to human ingenuity and capacity to build an enduring transportation system that challenged natural obstacles, creating communities, connecting regions, and advancing European American expansion.
- **Transportation Heritage:** The C&O Canal plays a vital role in the nation's transportation heritage—a catalyst for westward expansion and economic development—shaping industry, culture, recreation, and tourism for generations.
- **Life on the Canal:** Life on the C&O Canal during its construction and operation was fraught with challenges and life-threatening hazards in pursuit of uncertain rewards.
- **Change and Adaptation:** The prehistory and history of the Potomac Valley illustrates and reflects constant change and adaptation—the river's impact on land, nature, and cultures within the valley, and the interaction between the cultures and their impact on the river valley.
- **Geology and Geography:** The unique convergence of geology and geography in the Potomac River Valley inspires a sense of awe and humility.
- **Place of Refuge:** The C&O Canal is a place of refuge from the modern world—a setting where one can be spiritually renewed and reconnected to past generations and the natural world.

The north end of the existing open field would be reforested to expand the north tract's forested landscape. The southwest corner of the site would also be reforested to provide a vegetative buffer between the NPS property and the adjacent private property. In total, approximately 1.3 acres would be reforested. The riparian buffer along the Potomac River and the stream to the north of the pavilion would be improved to prevent or mitigate erosion.

At the north end of the parking lot, gate access to the meadow would be provided for mowing. Parking spaces would be arranged in a manner to maintain official vehicle access to the gate.

A vault toilet for public use would be added to the northwest corner of the parking lot. The vault toilet would be available for visitors utilizing the White's Ferry area and the C&O Canal Towpath. A buffer free of vehicles would be maintained around the vault toilet to ensure maintenance vehicle access when needed.



**Figure 28.** North Concept B: Ecological



Existing conditions



**Figure 29.** North Concept B: Ecological – Example of Future Informal Picnic Area and Meadow with the Improved Pavilion in the Background

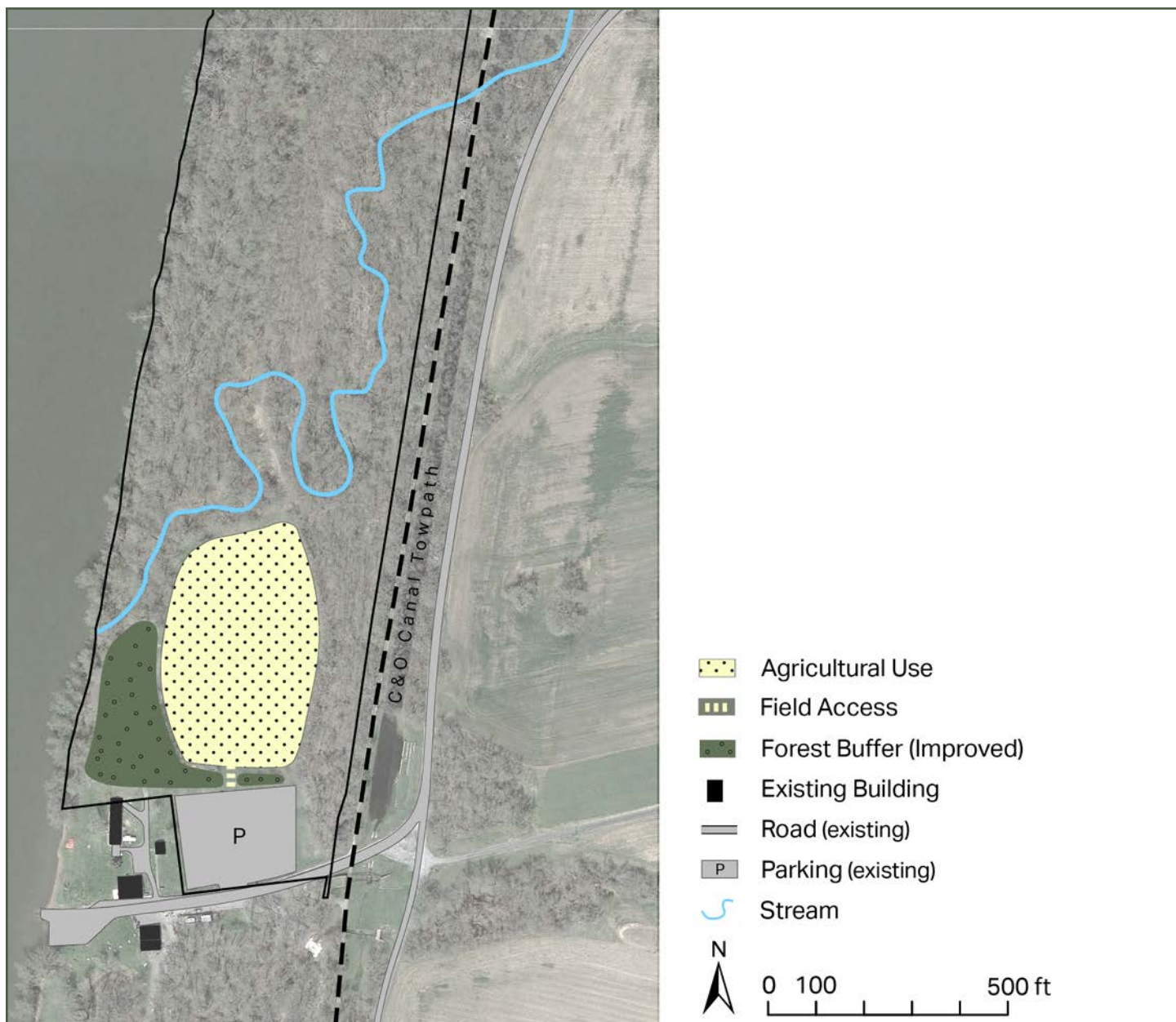
## Concept C: Agricultural

North Concept C: Agricultural would provide an opportunity for the site to be utilized for agricultural purposes, which would be consistent with the historic land use of the site.

The existing pavilion, electrical equipment, and water system would be removed. The existing open field would be converted to an approximately 3.6-acre agricultural field (such as for hay). The field would become part of the NPS agricultural leasing program, which would allow a local farmer to use the field for agricultural purposes. This approach would minimize NPS' maintenance responsibility.

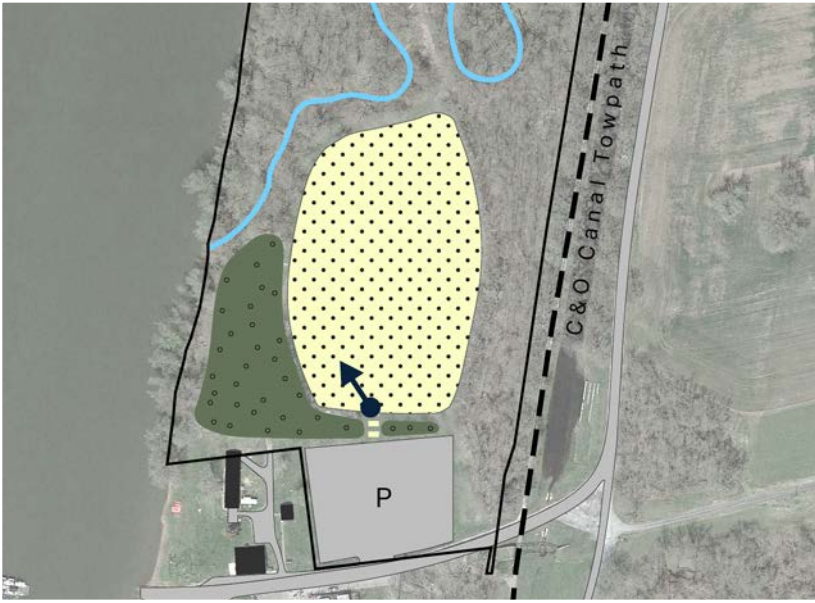
The southwest corner of the site and the area between the parking lot and the agricultural field would be reforested to provide a vegetative buffer between the NPS property, the adjacent private property, and the parking lot. In total, approximately 1.2 acres would be reforested.

At the north end of the parking lot, gate access to the agricultural field would be provided for agricultural equipment. Parking spaces would be arranged in a manner to maintain official vehicle access to the gate.



**Figure 30.** North Concept C: Agricultural





Existing conditions



**Figure 31.** North Concept C: Agricultural – Example of Future Improved Forest Buffer and Agricultural Field

## Summary

**Table 2** provides a summary of the features proposed for each north tract concept.

**Table 2.** Summary of the North Concept Features

	<b>North Concept A: Recreational provides:</b>	<b>North Concept B: Ecological provides:</b>	<b>North Concept C: Agricultural provides:</b>
<b>Improved pavilion</b>	Yes	Yes	No
<b>Informal picnic area</b>	Yes	Yes	No
<b>Shaded flexible space/group gathering area</b>	Yes	Yes	No
<b>Sunny flexible space/group gathering area</b>	Yes	No	No
<b>Meadow</b>	No	Yes	No
<b>Agricultural field</b>	No	No	Yes
<b>Interpretive signage</b>	No	Yes	No
<b>New and/or improved forest buffer areas</b>	Yes	Yes	Yes
<b>Improved riparian buffer</b>	Yes	Yes	No
<b>Improved parking lot</b>	Yes	Yes	Yes
<b>Vault toilet</b>	Yes	Yes	No

## SOUTH TRACT

The three concepts for the south tract include new amenities that would provide river access and camping experiences at the park for individuals and groups of varying sizes. This section first describes features that are common to all three south tract concepts, followed by a description of features that are unique to each concept. This section concludes with a simple table summarizing the features proposed in each concept.

### Features Common to All Concepts

The south tract concepts would all provide the following:

- **Campsites**, with options for group or individual campsites, and tent or RV/camper camping. All concepts would include the following:
    - Campsites that provide universal access for visitors with mobility impairments. These campsites would include accessible paths between the campsite and a parking area, vault toilet, and potable water source.
    - Group campsites. Each campsite would be available for organized groups (e.g., scouting groups) through a recreation fee, reservation, and permit system, which could generate revenue for the NPS. Because each concept would provide more than one group campsite, the group campsites would provide flexibility for use by a single large or multiple organized groups. A vegetative buffer would partially screen the group campsites from one another. Each campsite would include a fire ring, area for tents, and picnic tables. RVs and campers would be prohibited.
  - **Potable water access.** Well access would include upgrading the existing well to provide potable water.
  - **Vault toilets.** The concepts present options for vault toilets located along the existing access road or on the eastern edge of the south tract further away from the Potomac River.
- Both location options offer advantages and disadvantages. Vault toilets located along the existing access road would be more visible from the campsites and access road and would not be ideally located given the prevailing wind. However, vault toilets located on the eastern edge of the south tract could be visible from the C&O Canal Towpath. Further analysis of the exact siting and orientation of the vault toilets is required and would be included in future NEPA and NHPA analyses.
- **Parking**, with options for a large primary parking area or smaller parking areas distributed throughout the site, and shared parking between the campsites or parking at each campsite.
  - **River access** for non-motorized watercraft (i.e., canoes, kayaks, and stand-up paddleboards) and a small fishing pier. The river access point and the fishing pier would be available for use by campsite users only, including both group and individual campsite users. The river access point and fishing pier would not be staffed. If applicable, potential fees associated with using the river access point and fishing pier would be built into the campsite reservation fee.
  - An improved vegetated **riparian buffer** along the Potomac River to prevent or mitigate erosion.
  - A **trail connection** that would provide campsite user access to the C&O Canal Towpath. Signage would inform Towpath users that this new connecting trail is only for campsite users.
  - An **entry gate** at the north end of the existing access road and entrance to the south tract, which would function similar to entry gates NPS has for all other campgrounds. The gate would be used for emergency and administrative closure needs. The gate would continue to provide vehicle access to the adjacent private property to the south.

- Assessment of, and necessary improvements to, the **existing bridge** near the north end of the existing access road to accommodate heavy emergency and maintenance vehicles.
- A loop at the southern end of the access road to accommodate larger **vehicle turning** movement.

In all concepts, campsites would be designed in accordance with the *NPS Campground Design Guidelines* (2021). No electrical hook-ups would be provided at the campsites for campsite user use. Details of the upgraded existing well and new well (e.g., hand pump or if electric service is needed) would be determined in future design efforts.

Design modifications regarding existing electrical utilities would also be determined in future design efforts.

The surface of the proposed paths, trails, parking areas, and realignment of the existing access road in the concepts could be crushed stone.

## Concept A: Clustered

South Concept A: Clustered would provide tent campsites and sunny flexible open space for organized groups to gather and informally recreate.

Four (4) group campsites, ranging in size to accommodate 15-25 people each (approximately 75 people total), would be added along the existing access road. Group Campsite A would provide universal access for visitors with mobility impairments. No individual campsites would be provided.

The group campsites would share the single upgraded existing well as a potable water source; three vault toilets; and parking. The vault toilets would be located on the eastern edge of the south tract away from the Potomac River. A vegetative buffer would screen the vault toilets from the C&O Canal Towpath to prevent Towpath

users from entering the campsite area. To the south of Group Campsite A, an unpaved gravel path for official vehicle use only would provide maintenance vehicle access to the two vault toilets between Group Campsites A and B when needed. The existing access road would provide direct maintenance vehicle access to the third vault toilet between Group Campsites C and D when needed.

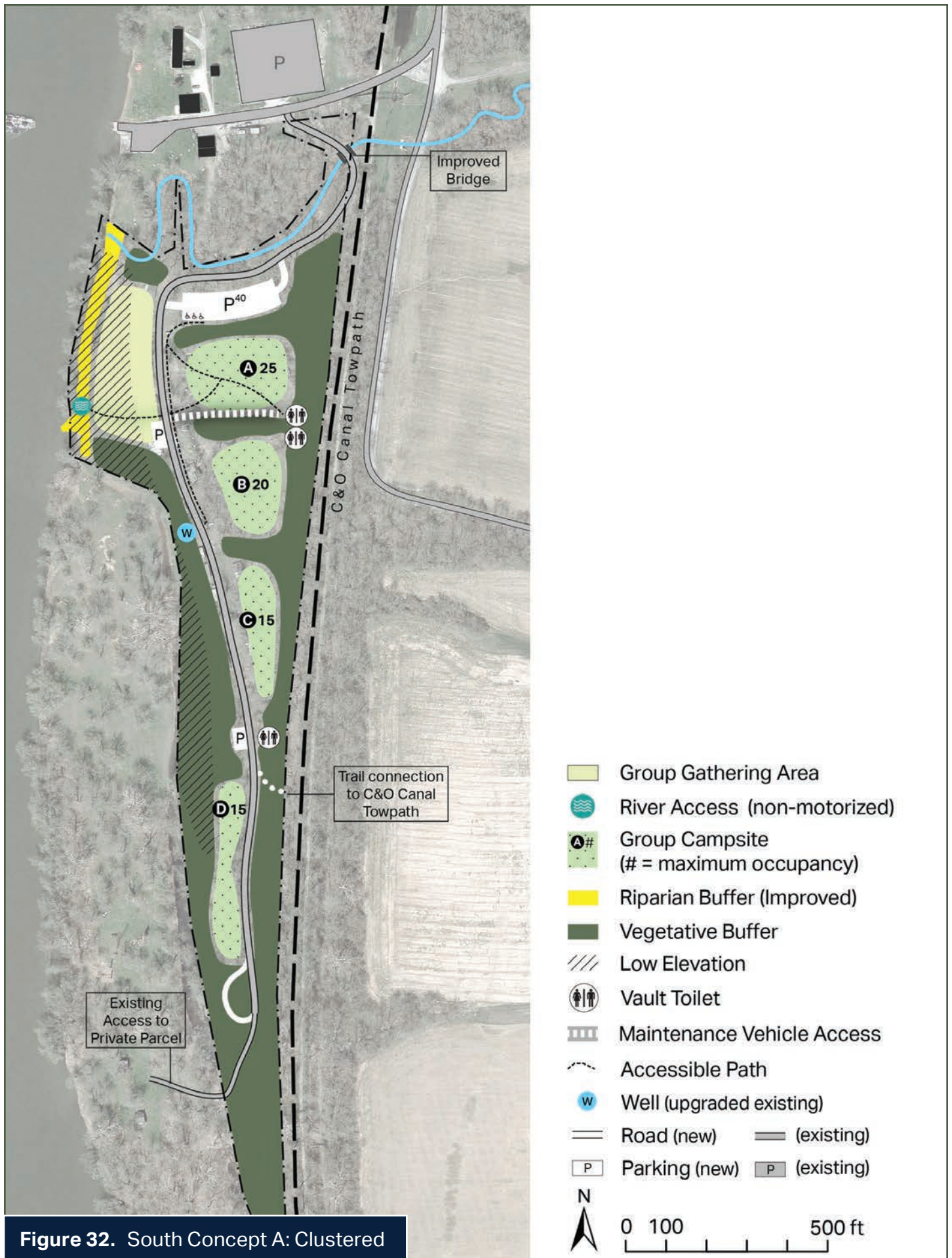
The campsites would share one large primary parking area (40 parking spaces, including accessible parking) and two smaller secondary parking areas. Campsite users would utilize the access road to unload camp equipment from their vehicles at their group campsite and then park in one of the three parking areas.

The existing open space between the access road and Potomac River would provide a sunny flexible space (approximately 1.2 acres) for gathering and informal recreation shared by campsite users. Regular mowing of the open space would be required to maintain a comfortable environment available for campsite user use.

An approximately 200-foot long path would provide pedestrian-only access from one of the smaller secondary parking areas to the river access point. Campsite users would utilize the parking area to unload their non-motorized watercraft and then carry their watercraft down the path to access the river.

A trail near the southern end of the access road would provide campsite user access to the C&O Canal Towpath.

The existing access road through the south tract would retain its current alignment.

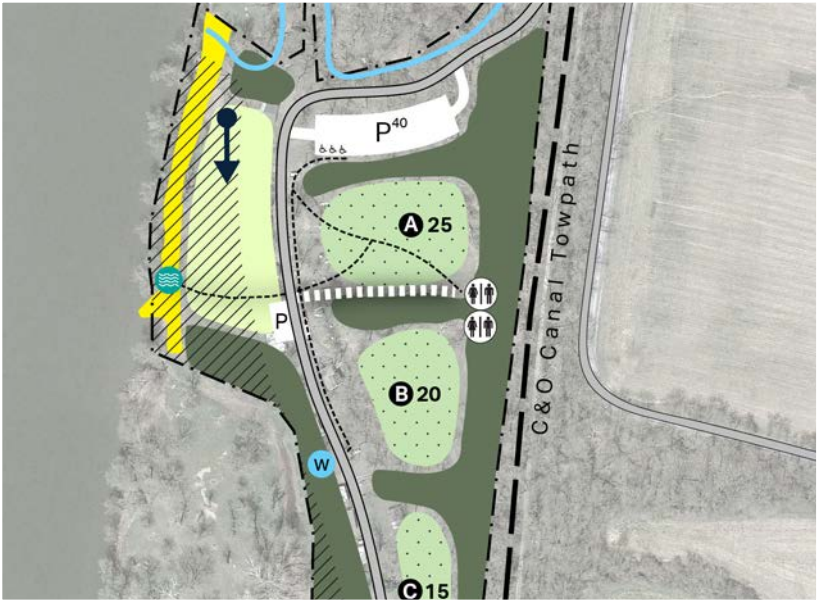




Existing conditions



**Figure 33.** South Concept A: Clustered – Example of Future Group Campsite A with Accessible Path leading to the Restroom in the Background



Existing conditions



**Figure 34.** South Concept A: Clustered – Example of Future Group Gathering Area and Improved Riparian Buffer with the Path to the Non-Motorized Boat Launch/Fishing Pier in the Background

## Concept B: Hybrid

South Concept B: Hybrid would provide tent campsites and sunny flexible open space for individuals, families, friends, and organized groups to gather and informally recreate. Compared to the other two south tract concepts, South Concept B would provide the most new facilities of the three south tract concepts.

Three (3) group campsites, ranging in size to accommodate 20-25 people each (approximately 65 people total), would be added to the east of the existing access road. All group campsites would be designed to provide universal access for visitors with mobility impairments.

Each group campsite would have its own vault toilet located along the access road. Group Campsite A would have its own parking area and a new well as a water source. Group Campsites B and C would share a parking area and the upgraded existing well to provide potable water. Each parking area would include 20 parking spaces, including accessible parking.

Ten (10) individual campsites, which would accommodate tents or RVs/campers, would be added at the south end. Two (2) campsites would be designed to provide universal access for visitors with mobility impairments. Each campsite would be available through a recreation fee, reservation, and permit system, which could generate revenue for the NPS. Each campsite would include a fire ring, area for tents, a picnic table, and parking. Additional parking for these individual campsites would be available in a small parking area (10 parking spaces, including additional accessible parking). The campsites would also share a vault toilet and a new well as a water source. No sewage pump hook-ups for the RVs/campers or electricity would be provided.

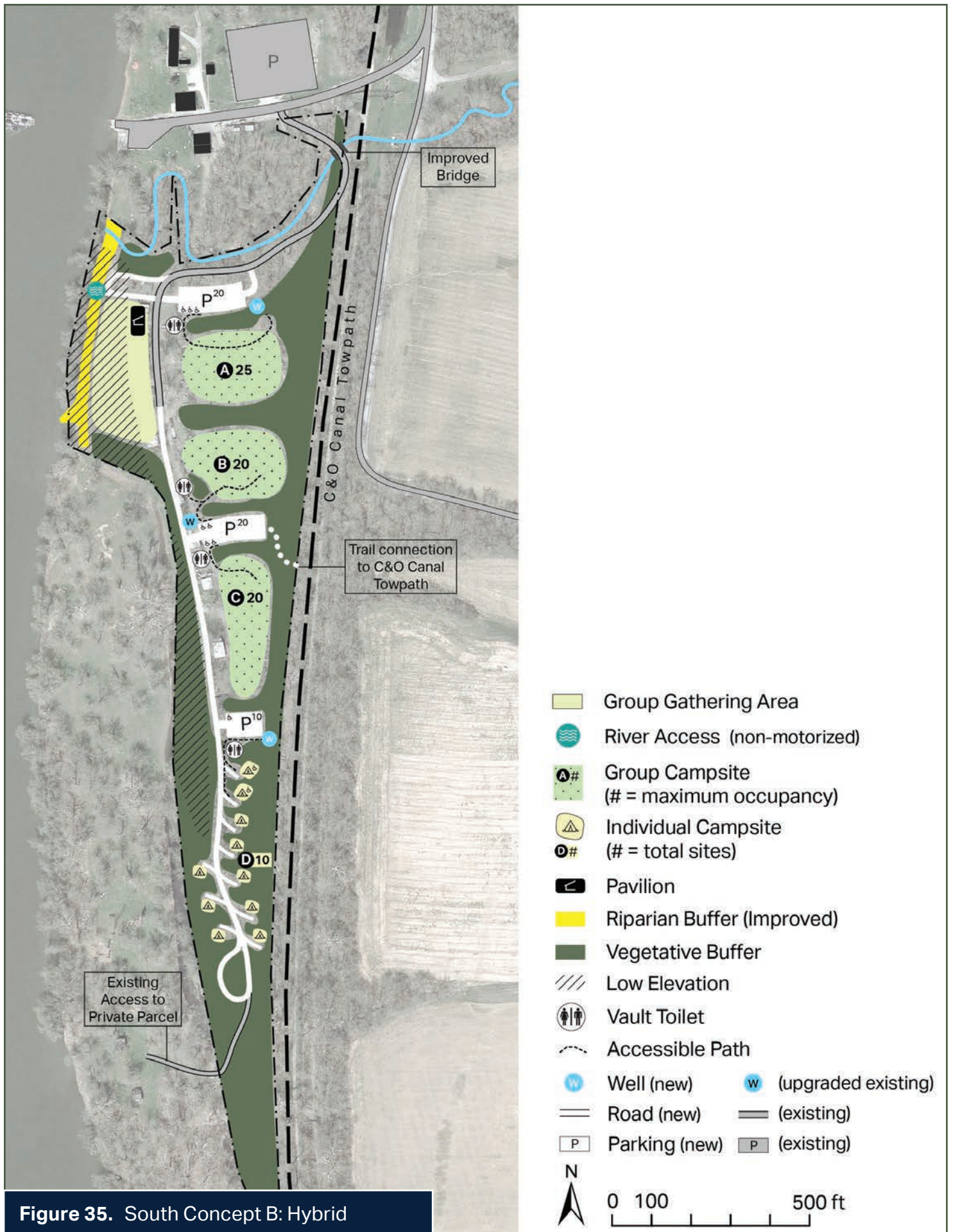
The existing open space between the access road and the Potomac River would provide a sunny flexible space (approximately 1.1 acres) for gathering and informal recreation shared by campsite users. A pavilion at the north end of the open space would provide shaded gathering and picnic space shared by all campsite users. The pavilion could also provide overhead shelter during inclement weather. The pavilion would be designed to provide universal access for visitors with mobility impairments and in accordance with the *NPS Campground Design Guidelines* (2021). No electricity would be provided at the pavilion.

A drive to the river access point would allow for easier non-motorized watercraft unloading/loading from campsite user vehicles.

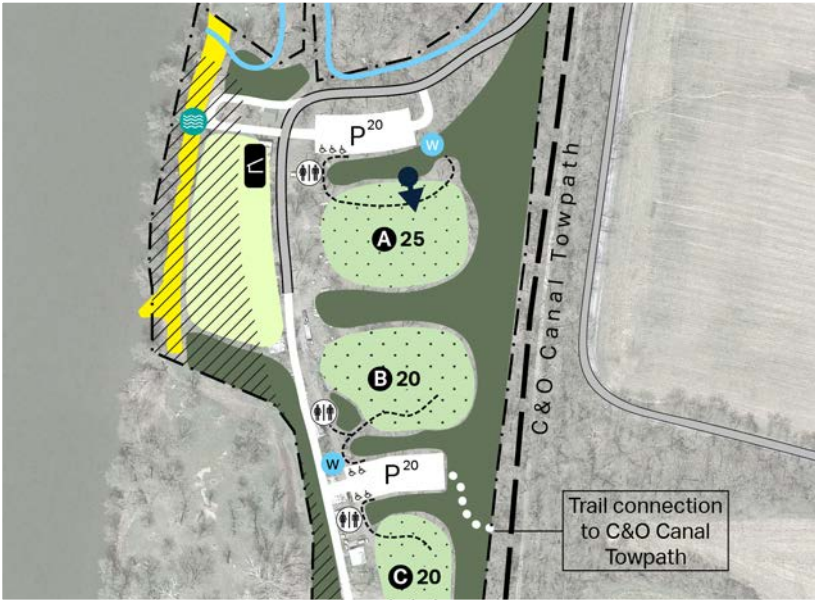
A trail near the middle of the access road would provide campsite user access to the C&O Canal Towpath.

The north section of the existing access road would retain its' current alignment. The southern section of the existing access road would be re-aligned to the west to accommodate the configuration and physical space needed for the group and individual campsites on the east side of the access road. Because the four vault toilets would be located along the access road, the access road would provide direct maintenance vehicle access to the vault toilets when needed.

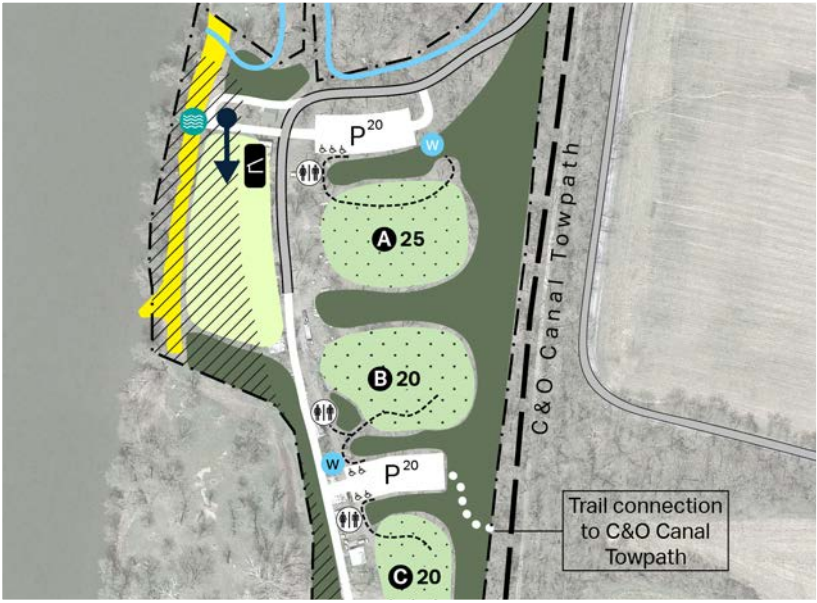




**Figure 35. South Concept B: Hybrid**



**Figure 36.** South Concept B: Hybrid – Example of Future Group Campsite A with Accessible Path in the Foreground and the Vegetative Buffer between Campsites A and B in the Background



**Figure 37.** South Concept B: Hybrid – Example of Future Path to the Non-Motorized Boat Launch/ Fishing Pier with the Group Gathering Area and Improved Riparian Buffer in the Background

## Concept C: Dispersed

South Concept C: Dispersed would provide tent campsites for individuals, families, friends, and organized groups, as well as a wide reforested buffer along the Potomac River. Compared to the other two south tract concepts, South Concept C would provide the fewest new facilities, or have the lightest “development” touch, and the most area of reforestation. Larger vegetative buffers would screen the dispersed campsites from one another.

Two (2) group campsites, ranging in size to accommodate 20-25 people each (approximately 45 people total), would be added along the existing access road. Group Campsite B would provide universal access for visitors with mobility impairments. Each group campsite would have their own vault toilet. A vegetative buffer would screen the vault toilets from the C&O Canal Towpath to prevent Towpath users from entering the campsite area. To the north of Group Campsite B, an unpaved gravel path for official vehicle use only would provide maintenance vehicle access to the two vault toilets for the group campsites when needed.

Eight (8) individual tent campsites, which would include six (6) walk-in or bike-in campsites and two (2) campsites that provide universal access for visitors with mobility impairments, would be added. Each campsite would be available on a first-come, first-serve basis. Each campsite would include a fire ring, area for tents, and a picnic table. The campsites would share a vault toilet, shower(s), and a small parking area, which include accessible parking spaces. No parking would be available at the individual campsites. Because no other hiker-biker campsites along the C&O Canal Towpath include shower facilities, the shower(s) would fulfill a need for long-distance C&O Canal Towpath hikers and bikers who camp overnight at the south tract. The existing access road would provide direct maintenance vehicle access to the vault toilet and shower(s) for the individual campsites when needed.

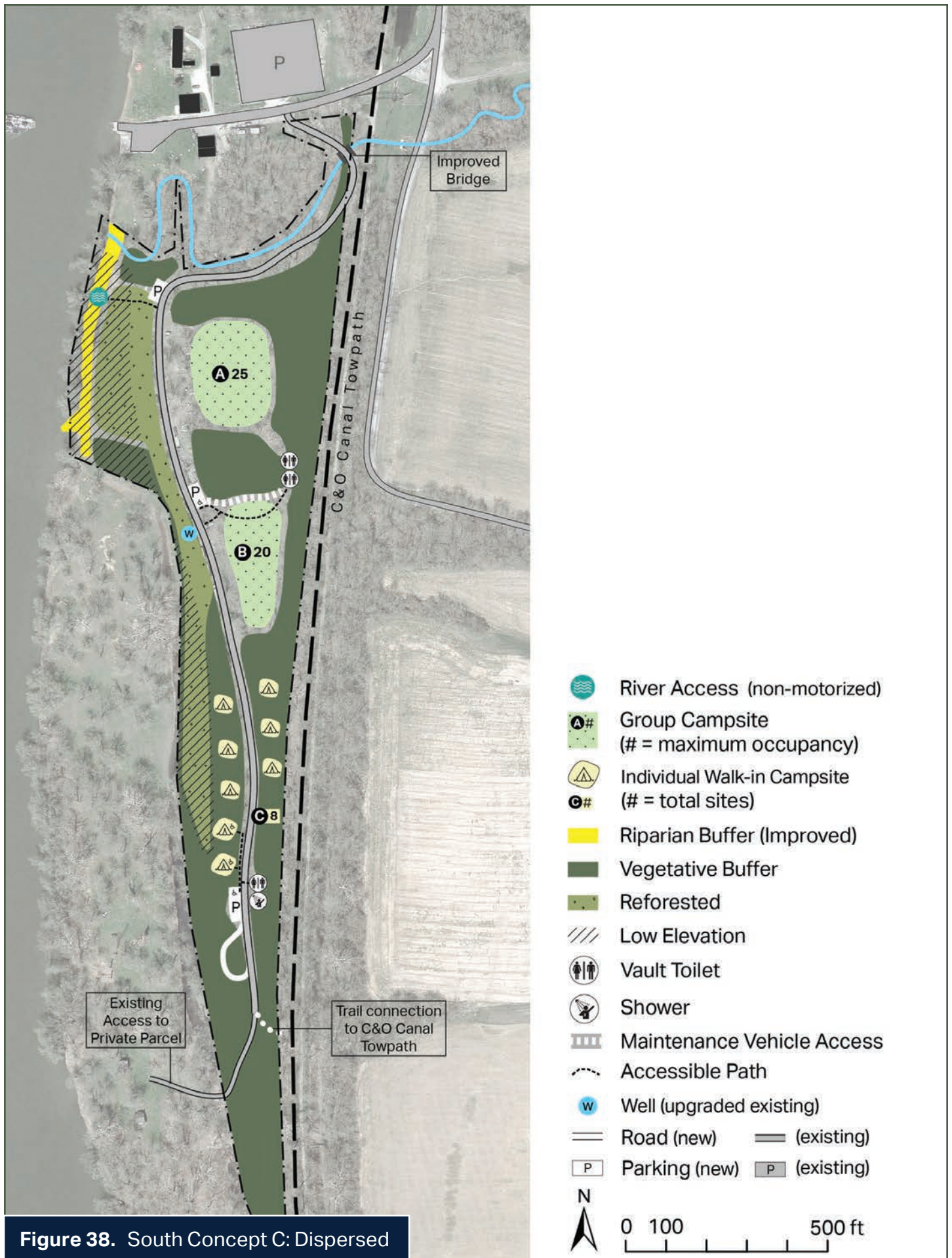
The existing well would be upgraded to provide a potable water source for the group and individual campsites. Campsite users would utilize the access road to unload camp equipment from their vehicles at their campsite and then park in one of the three small parking areas or the north tract parking lot, if needed, for overflow parking. RVs and campers would be prohibited at the group and individual campsites.

To provide additional wildlife habitat and prevent or mitigate erosion, the existing open space between the access road and the Potomac River would be reforested (approximately 2.5 acres).

An approximately 150-foot long path would provide pedestrian-only access from one of the parking areas to the river access point. Campsite users would utilize the parking area to unload their non-motorized watercraft and then carry their watercraft down the path to access the river.

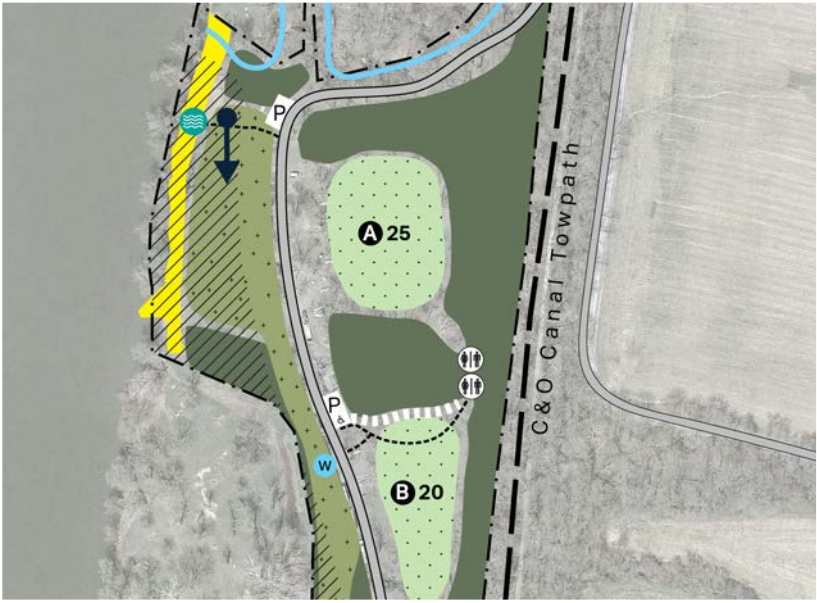
A trail near the southern end of the access road would provide campsite user access to the C&O Canal Towpath.

The existing access road through the south tract would retain its' current alignment.





**Figure 39.** South Concept C: Dispersed – Example of Future Group Campsite A with the Vegetative Buffer Between Campsites A and B in the Background



**Figure 40.** South Concept C: Dispersed – Example of Future Path to the Non-Motorized Boat Launch/Fishing Pier with the Reforested Area and Improved Riparian Buffer in the Background

## Summary

**Table 3** provides a summary of the features proposed for each south tract concept.

**Table 3.** Summary of the South Concept Features

	<b>South Concept A: Clustered provides:</b>	<b>South Concept B: Hybrid provides:</b>	<b>South Concept C: Dispersed provides:</b>
<b>Group tent campsites</b>	Yes	Yes	Yes
<b>Individual tent campsites</b>	No	Yes	Yes
<b>Individual RV/ camper campsites</b>	No	Yes	No
<b>Accessible campsites</b>	Yes	Yes	Yes
<b>Potable water access - upgraded existing well</b>	Yes	Yes	Yes
<b>Potable water access - new well</b>	No	Yes	No
<b>Vault toilets</b>	Yes	Yes	Yes
<b>Showers</b>	No	No	Yes
<b>Parking - Shared between campsites</b>	Yes	No	Yes
<b>Parking - At each campsite</b>	No	Yes	No
<b>Sunny flexible space/group gathering area</b>	Yes	Yes	No



	South Concept A: Clustered provides:	South Concept B: Hybrid provides:	South Concept C: Dispersed provides:
<b>Pavilion</b>	No	Yes	No
<b>River access point</b>	Yes	Yes	Yes
<b>Trail connection to C&amp;O Canal Towpath</b>	Yes	Yes	Yes
<b>Reforestation</b>	No	No	Yes
<b>Improved riparian buffer</b>	Yes	Yes	Yes
<b>Improved existing bridge</b>	Yes	Yes	Yes

## IDEAS CONSIDERED BUT DISMISSED

The NPS considered several new ideas for the White’s Ferry area provided during the public and stakeholder engagement process described in the **Public and Stakeholder Engagement Process** section of the **Introduction** chapter. While some new ideas proposed during the engagement process were incorporated into the concepts presented in this chapter, other ideas were ultimately dismissed from further consideration for reasons described below.

### General

- Establish a museum focused on ferry history. This idea was dismissed from further consideration because NPS would not be able to fund, staff, or maintain a museum. Furthermore, the location of a museum within the 100-year floodplain would not be consistent with Executive Order 11988 – Floodplain Management and DO-77-2: Floodplain Management.

- Add benches along the C&O Canal Towpath. This idea was dismissed from further consideration because the C&O Canal Towpath is not within the project area and therefore is outside the scope of this project.

### North Tract

- Name the area after Gilbert Gude, a former Congressional representative from Montgomery County. This idea was dismissed from further consideration because it would require legislative action and would be inconsistent with the remainder of the park.
- Add a second set of restrooms in the existing parking lot next to White’s Ferry Road and near the C&O Canal Towpath. A second set of restrooms was dismissed from further consideration because they would be redundant given the close proximity of the proposed vault toilets the northwest corner of the parking lot in North Concept A: Recreational and North Concept B: Ecological. The proposed vault toilet would be available for visitors utilizing both the White’s Ferry area and the C&O Canal Towpath.

- Add a new walking path with occasional benches for reflection. A new walking path was dismissed from further consideration because North Concept A: Recreational and North Concept B: Ecology aim to maximize the sunny flexible space and meadow, respectively, within the existing open field. A new walking path would also be redundant given the close proximity of the C&O Canal Towpath. Benches were dismissed from further consideration because the picnic areas in North Concept A: Recreational and North Concept B: Ecological would provide seating options.
- Place the older White's Ferry ferry boat parked next to White's Ferry Road in the play area for visual purposes. This idea was dismissed from further consideration because the NPS does not own the ferry boat.
- Add a playground or canal boat playpark. This idea was dismissed from further consideration because playgrounds are not consistent with the legislative purpose and significance of the park.
- Install a reproduction dry lock or canal boat. This idea was dismissed from further consideration because canal boat programs are provided elsewhere within the C&O Canal National Historical Park at Great Falls and Williamsport and examples of locks/boats are provided elsewhere in the park.

## South Tract

- Add a second Potomac River access point for campsite users. A second access point was dismissed from further consideration because it would be redundant given the close proximity of the proposed river access point in the South Concepts and the existing river access point located on the private property where the White's Ferry river crossing operation and White's Ferry Store & Grill are located.
- Place a new well closer to the individual campsites. A new well closer to the individual campsites was dismissed from further consideration because well access is already proposed within a short walking or driving distance from the individual campsites in South Concept B: Clustered and South Concept C: Dispersed. The distance between well access and the farthest individual campsite in these concepts is approximately 0.1 to 0.2 miles.. Parking is also available adjacent to well access. Additionally, South Concept C: Dispersed aims to have lightest touch on land and therefore, the proposed centrally-located existing well is intended to be shared by users of both the group campsites and individual campsites. For these reasons, a new well closer to the individual campsites was dismissed from further consideration.
- Rehabilitate/improve some of the cabins to rent to the general public. This idea was dismissed from further consideration because cabin rentals are not consistent with the legislative purpose and significance of the park; the necessary funding required to rehabilitate/improve the cabins to eliminate their current potential risk to human health, safety, and natural resources would not be balanced with the park's fiscal capacities; would not be realistic in terms of what the NPS can maintain; and would not be respectful of the site's location within the 100-year floodplain.

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# MOVING FORWARD

## PRIORITY NEXT STEPS

The following section outlines priority steps, including operations and maintenance strategies, the NPS would take to further develop the White's Ferry area Concept Plan. The order in which these steps are listed do not reflect their relative significance.

Actions included in this plan will be reviewed holistically to determine and understand the potential implications of changes to facilities, programming, and operations and maintenance. The NPS will conduct the appropriate level of review, including analysis under NEPA and NHPA, to comply with applicable laws and policies. The implementation of proposals in this plan will be reviewed in accordance with laws and policies on a case-by-case basis. Proposed activities and facilities could be implemented independently, or as part of a larger implementation strategy, as funding is available. A preferred concept, which could include a combination of improvements mixed-and-matched from different concepts, would be identified in the future through additional public and stakeholder engagement and the environmental and historical preservation compliance processes.

Priority steps include:

- **Develop a vegetation plan.** The NPS could consult with a certified arborist to identify and remove hazardous trees that are a safety concern. An arboriculture plan could be developed for healthy mature trees and trees that require restorative pruning or disease control. The concepts propose new and/or improved forest buffer and improved riparian buffers. The NPS would need to identify appropriate native and non-invasive vegetation, determine future or ongoing maintenance needs and associated staffing required, and if necessary, seek potential partners to fund and/or lead the reforestation efforts and riparian buffer improvements. A landscape assessment and a plan to restore native vegetation along the Potomac River shoreline and within the floodplain could enhance the White's Ferry area's ecological and floodplain capacity.
- **Evaluate the existing bridge in the south tract.** The weight limit of the existing bridge along the access road that crosses the south tract's stream is unknown. The bridge's weight limit would need to be identified prior to use by heavy vehicles/equipment, which could be necessary to implement improvements proposed in the south tract concepts.
- **Develop a phased approach for the proposed new and improved amenities and facilities.** The NPS would need to identify how the proposed pavilion repair and upgrade, picnic areas and flexible spaces, vault toilets, parking lot update, and campsites are prioritized for funding and implementation. The Concept Plan is the first step in the overall decision-making process and additional environmental and historic preservation compliance is needed prior to implementation.
- **Develop signage to interpret the ecological and historic context of the site.** Utilize the *C&O Canal National Historical Park Foundation Document* (2013), the *C&O Canal National Historical Park LRIP* (2010), the *C&O Canal National Historical Park Historic District NRHP registration form* (2015), and the *NPS Management Policies* (2006) to identify appropriate themes and content for interpretive signage.
- **Utilize existing NPS systems, such as Recreation.gov, to establish a recreation fee collection, reservation, and permit system for select areas.** The NPS would need to determine associated fees, rules, and regulations for rental of the repaired and upgraded pavilion in the north tract concepts and campsites in the south tract concepts.

# REGULATORY REQUIREMENTS

## National Environmental Policy Act

Before implementing elements in the Concept Plan, the NPS will work through the analytic and review processes as specified by NEPA requirements. The NPS would conduct an initial evaluation of actions to determine if they qualify for a categorical exclusion (CE), or if an additional level of analysis of impacts on the environment would be required. Particular resources of interest could include cultural resources, including the NRHP-listed C&O Canal National Historical Park Historic District; archeological resources; water resources; and visitor use and experience.

## National Historic Preservation Act

Prior to implementation, the NPS would consider the potential effects on historic properties that may result from implementation of the concepts presented herein. The White's Ferry area is located within the NRHP-listed C&O Canal National Historical Park Historic District. Contributing resources to the historic district are located within the White's Ferry area. Additionally, archeological sites are present within the White's Ferry area. Additional historic properties could be identified during the NHPA process.

Changes to the site would follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* to the extent practicable. In cases where this is not possible, the NPS would seek to avoid, minimize, and mitigate potential adverse effects on historic properties. The NPS would coordinate this effort with the Maryland Historical Trust (i.e., the State Historic Preservation Office) and Federally Recognized Tribes.

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South Tract - Open Space adjacent to the Potomac River (2021)



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# APPENDIX A: PUBLIC AND STAKEHOLDER ENGAGEMENT

**WHITE'S FERRY**  
**DEVELOPMENT CONCEPT PLAN**  
**PUBLIC COMMENT PERIOD #1 REPORT**

**JULY 11, 2022**

**INTRODUCTION TO PUBLIC COMMENT PROCESS**

**Project Description**

The National Park Service (NPS) is developing a Development Concept Plan (Plan) for the White's Ferry area of the Chesapeake and Ohio Canal National Park in Montgomery County, Maryland. The White's Ferry area is an approximately 73-acre site composed of two land tracts (Tracts 17-101 and 17-102) that include open space, a picnic pavilion, a large parking lot, wooded areas, access to the Potomac River, structures, and access to private lands.

Following the public comment period #1, the NPS will refine its initial range of concepts for future public use and enjoyment of the White's Ferry area. The NPS will share these revised concepts with the public during a second public comment period and provide further opportunities for feedback. The outcome of the effort will be a Development Concept Plan that contains a range of potential improvements that could then be considered as options for the NPS to implement. The Plan is conceptual and is not a decision document.

**Comment Period #1**

The first public comment for the Plan began on May 11, 2022 and extended through June 11, 2022. Project materials posted on the NPS Planning, Environment, and Public Comment (PEPC) website included the virtual public meeting presentation and a recording of the presentation. Written comments could be submitted via the PEPC website or mail.

Description of Scoping Meeting

A virtual public scoping meeting was held on May 11, 2022 to present proposed ideas for the Plan and to engage the public to identify issues, concerns, and ideas. The public meeting was held from 6:00 p.m. to 8:00 p.m. via Microsoft Teams. Approximately 24 attendees, including NPS staff and consultant representatives, participated in the virtual meeting.

The public meeting included a formal presentation given by NPS and consultant representatives followed by a discussion where meeting attendees were provided an opportunity to ask questions, provide feedback on the proposed Plan, and share issues, concerns, and ideas. The presentation addressed the following:

- Welcome + Introductions
- Meeting Purpose

- Existing Conditions
- Review of Initial Concepts
- Questions + Answers
- How to Submit Comments

## **SUMMARY OF COMMENTS**

### **Introduction**

Eleven pieces of correspondence were received during the public scoping period. Seven correspondences were received from Maryland residents, including those from Beallsville, Bethesda, Germantown, Hyattsville, Poolesville, and Potomac.

Members or official representatives of several groups, including the members of the C&O Canal Association, Maryland Historical Trust, The Maryland Monocle newspaper, and Rustic Roads Advisory Committee also submitted comments.

Comment analysis assists the planning team in organizing, clarifying, and addressing technical information relevant to the planning process. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process. The following summary of comments is provided to outline the major groupings of comments, along with examples of specific comments to illustrate the trend.

### **General Statements Included in Comments**

- 1. Comments supporting the proposed Plan.** Five correspondences expressed support for different elements of the proposed Plan.

One correspondence expressed support for the establishment and improvement of forest areas, riparian buffers, and other natural areas; North Concept B: Ecological; and South Concept C – Dispersed. The correspondence noted that a plan focused “primarily on improved forest and habitat areas while still providing recreation areas for visitors is the best use.” The correspondence also recommended adding more forest for better habitat and reduced maintenance.

Another correspondence expressed support for the retention and repair of the pavilion, parking lot, and “a regular maintenance of the property that allows public use with a reasonable schedule of mowing.”

Another correspondence expressed support for the upgraded pavilion, new restrooms, new picnic tables, and the forest and riparian buffers. The correspondence also noted that they see advantages for both the open play area and meadow proposed in North Concepts A: Recreational and B: Ecological.

Another correspondence expressed support for North Concept B: Ecological because it would require less mowing.

Another correspondence expressed support for a recreational area, regular mowing, and new restrooms on the north tract. The correspondence also expressed support for public campgrounds on the south tract.

- 2. Comments opposing the proposed Plan.** Three correspondences expressed concerns or opposed specific elements of the proposed Plan. One correspondence expressed opposition to North Concept C: Agricultural Use because the agricultural use would not advance the public use and enjoyment goal of the project.

One correspondence expressed concern about the proposed reforestation along the Potomac River in the south tract noting that the trees would block views of the river and sunsets, along with sky views from the campsites.

Two correspondences expressed concern about locating the toilets next to the towpath noting the following:

- The location is in conflict with the Foundation Document's objective that the Park "preserves and interprets 19th century canal transportation."
- The river floods up to the towpath, including in May 2022.
- The restrooms should be located between the campsites and river or where the current outhouses are because they are on higher ground and are less likely to flood in a minor flood event. The proposed location of the restrooms is on lower ground that floods first.
- Restrooms by the towpath would encroach on the privacy of campers.

- 3. New ideas.** Six correspondences provided new ideas for the Development Concept Plan. One correspondence provided the following recommendations for the north tract:

- Name the area after Gilbert Gude, a Congressional representative from Montgomery County in the 1960s and 1970s, who introduced a bill to make the C&O Canal a National Historic Park.
- New restrooms by the concrete patio and on the far side of the parking lot by the C&O Canal towpath next to White's Ferry Road. The correspondence noted "The location of the restroom by the towpath will allow through towpath travelers the benefit of not having to cross the parking lot to use the one near the pavilion. The one by the pavilion side of the parking lot would be more than likely used by people using the picnic tables or the pavilion which would offer more privacy."
- A walking path by the play and reforested areas in North Concept A: Recreational with benches and wayside signage describing local history of the C&O Canal, Civil War, and farming; local ecology; and Gilbert Gude's efforts to turn the park into a National historical Park.
- Place the older White's Ferry ferry boat parked next to White's Ferry Road in the play area for visual purposes.
- Canal boat playpark similar to the one at Canal Basin Park in Hollidaysburg, PA.
- Reproduction dry lock
- Reproduction canal boat

Two correspondences recommended that the NPS rehabilitate/improve some of the cabins on the south tract of the White's Ferry area to rent to the general public:

- “Seems to me that the park service could spend some time (and yes, money) to re-condition/improve these cabins and make them available to rent for the general public. . . . There could still be an area provided for campsites. . . . I believe that by keeping the cabins and making some needed improvements, this would be a very appealing location for overnight or longer stays for folks from all surrounding areas. It would also be a very desirable place to stay for folks doing longer towpath bike rides (as an alternative to using existing towpath campsites).”

Two correspondences recommended establishing a museum dedicated to the history of ferries:

- “The [C&O] Canal has a number of museums and information centers along its route from Georgetown to Cumberland. . . . There are no such facilities along the entire Montgomery County segment of the canal. . . . The history and role of ferries and the contribution they made to the Canal's history is not told in any detail along the Canal. What better way to help educate today's tourists, students and outdoor enthusiasts about the role of ferries than to build a museum dedicated to ferries on park service land near today's only remaining ferry at White's Ferry.”
- “I hope the NPS will authorize a long-term study for the potential use of this site as a public educational resource (i.e. museum) to honor and pay tribute to the ferry industry in Maryland and Virginia. Such a facility would best be initiated through a public/private sector partnership to design and build the museum on stilts to raise it above historic flood levels. Funds would come from governmental (Federal, State(s), and local) support as well as private sector donation. The primary purpose would be to honor the history of the ferry industry, economically as well as its role during the Civil War. Plans could include living history opportunities. Such a proposal could be useful in expanding and improving the park service role at Balls Bluff. While these plans are developed and funds raised, renting the pavilion, which would include improved recreational playground facilities, enhanced sport fishing and canoe/row boat rental to help raise revenue to stem property maintenance costs should be encouraged. Hopefully White's Ferry will ultimately re-open, but even if were not to do so, the museum site as a daytrip destination could still work and with cooperation from the owners of the ferry service, a living history ferry experience could be an attraction by having the current ferry still operate taking visitors across the river and back without actually landing on the Virginia side.”

Two correspondences recommended that the campsites be a mix of group and individual campsites. One correspondence noted “the hiker-biker campgrounds are fine for those with the abilities to hike or bike the length of the canal, but there is a dearth of individual sites available for those with different abilities.” The correspondence recommended common space for group campsites with lower density and greater privacy for the individual sites. A small pavilion in the common space for the group campsites could offer use during inclement weather. The other correspondence noted that the demand for single campsites is high in the DC metro area and could bring in more revenue. Paddlers or anglers interested in multi-day camping or long segment paddles would be interested in single campsites, especially with a non-motorized boat launch.

**4. Other Comments.** Additional comments related to the Plan included the following:

- The Plan should consider the differences in recreational opportunities and the audience for facilities if the ferry is operational (e.g., the park would receive more northern Virginia users if the ferry is operational).
- The C&O Canal Association and Rustic Roads Advisory Committee requested to be part of future communications about the Plan from the NPS. Both organizations noted that they were surprised by the public scoping period or received no notice of the public meeting.
- Two correspondences requested more information on the Plan, including the following:
  - Project funding and implementation schedule
  - **North Tract:** Additional details regarding the pavilion repairs, pavilion rental use, picnic tables, cost estimates, plans for the concrete patio, and the potential cooperative agreement for restrooms and maintenance
  - **South Tract:** Additional details regarding camping and non-motorized boat launch fees, campsite amenities, vehicle and pedestrian access control, and potential partnerships with White's Ferry Store.
- One correspondence noted that they support that the current access points to White's Ferry Road and River Road, which are two roads in the Rustic Roads Program, are being maintained and that no new access is being proposed.
- The Maryland Historical Trust notes archeological resources within the White's Ferry area and recommended that "NPS incorporate a robust consideration of historic and archeological properties as part of its planning for the use of these parcels and preparation of the DCP. NPS should ensure the appropriate preservation and treatment of significant historic and archeological properties in its planned uses and facilities on these parcels."

**5. Comments unrelated to the Project.** Comments in two correspondences focused on the White's Ferry ferry operation, which occurred on private property and is not within the scope of the White's Ferry Development Concept Plan.

**WHITE'S FERRY**  
**DEVELOPMENT CONCEPT PLAN**  
**PUBLIC COMMENT PERIOD #2 REPORT**

**DECEMBER 15, 2022**

**INTRODUCTION TO PUBLIC COMMENT PROCESS**

**Project Description**

The National Park Service (NPS) is developing a Development Concept Plan (Plan) for the White's Ferry area of the Chesapeake and Ohio Canal National Park in Montgomery County, Maryland. The White's Ferry area is an approximately 73-acre site composed of two land tracts (Tracts 17-101 and 17-102) that include open space, a picnic pavilion, a large parking lot, wooded areas, access to the Potomac River, structures, and access to private lands.

Following public comment period #2, the NPS will further refine the concepts for future public use and enjoyment of the White's Ferry area. The NPS will incorporate these concepts into the Plan, which will contain a range of potential improvements that could then be considered as options for the NPS to implement. The Plan is conceptual and is not a decision document.

**Comment Period #2**

The second public comment for the Plan began on October 12, 2022 and extended through November 12, 2022. Project materials posted on the NPS Planning, Environment, and Public Comment (PEPC) website included the virtual public meeting presentation, a recording of the presentation, and information sheets with a more detailed description of each concept. Written comments could be submitted via the PEPC website or mail.

Description of Scoping Meeting

A virtual public scoping meeting was held on October 12, 2022 to present the revised concepts for the Plan and to engage the public to identify issues, concerns, and ideas. The public meeting was held from 6:00 p.m. to 7:30 p.m. via Microsoft Teams. Sixteen attendees, including NPS staff and consultant representatives, participated in the virtual meeting.

The public meeting included a formal presentation given by NPS and consultant representatives followed by a discussion where meeting attendees were provided an opportunity to ask questions, provide feedback on the proposed Plan, and share issues, concerns, and ideas. The presentation addressed the following:

- Welcome + Introductions
- Meeting Purpose
- Existing Conditions



- Review of Initial + Refined Concepts
- Questions + Answers
- How to Submit Comments

## **SUMMARY OF COMMENTS**

### **Introduction**

Eight pieces of correspondence were received during the public scoping period. Three correspondences identified themselves as Maryland residents, including those from Montgomery County and Frederick County.

Two more correspondences from members or official representatives of local/regional groups, including the members of The C&O Canal Association and the Commissioners for the Town of Poolesville, also submitted comments.

Comment analysis assists the planning team in organizing, clarifying, and addressing technical information relevant to the planning process. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process. The following summary of comments is provided to outline the major groupings of comments, along with examples of specific comments to illustrate the trend.

### **General Statements Included in Comments**

- 1. Comments supporting the proposed Plan.** Six correspondences expressed support for different elements of the proposed Plan.

One correspondence expressed support for the project in general and continued public use of the site.

One correspondence expressed support for elements of the plan including the upgraded pavilion, new restrooms, new picnic tables, and the forest and riparian buffers.

Three correspondences expressed support for the recreational concept (Concept A) for the northern tract.

Two correspondences expressed support for the ecological concept (Concept B) for the northern tract due to its versatility and benefits to local wildlife including habitat creation in addition to minimal maintenance.

Two correspondences expressed support for Concept C: Dispersed for the southern tract due to the increased vegetation reducing flooding in the area most vulnerable to flooding.

Two correspondences appreciated the addition of individual campsites in the southern tract and expressed support for the concentrated concept (Concept B) for the southern tract as it provides more individual campsites in addition to group campsites and RV access.

- 2. Comments opposing the proposed Plan.** Five correspondences expressed concerns or opposed specific elements of the proposed Plan.

One correspondence expressed concern about towpath users who cannot walk great distances without stopping to rest.

One correspondence expressed concern about the maintenance and construction costs of each concept and the expected revenue for the camp sites in addition to visitor count and project timeline.

One correspondence expressed concern about the subject of signage and access control in addition to camping and kayak fees and access to potable water.

One correspondence expressed concern about when the northern and southern tracts will be open to the public, whether they will open and operate simultaneously, and when maintenance will begin.

Three correspondences expressed concern about the history and context of White's Ferry, including the ferry operation, being excluded from the Development Concept Plan.

**3. Recurring ideas.** Six correspondences repeated ideas that were mentioned in the first round of public comments.

- A small pavilion should be located at the common space in the southern tract so that groups can use the facilities in inclement weather.
- There should be a second set of restrooms on the northern tract, located in the parking lot next to White's Ferry Road and near the towpath.
- Walking paths should be established in the northern tract with occasional benches for reflection and wayside signage describing the ecology of the area.
- The park at White's Ferry should be named after former Congressman Gilbert Gude from Montgomery County.
- One correspondence included a request for a museum on site devoted to ferry history.
- Other correspondences indicated similar desires for ecological and historical context interpretation at the site.

**4. New ideas.** Five correspondences provided new ideas for the Development Concept Plan.

**New recreation ideas:**

- Benches should be placed every quarter mile or so along the towpath for towpath users to stop and rest.
- The design for North Concept A: Recreational should include a playground.
- Another river access point for campground users would be helpful.
- A new well should be placed closer to the individual campgrounds and potable water access should be available.

- Showers should be installed at the various campgrounds for long-distance towpath travelers.

**5. Other Comments.** Additional comments related to the Plan included the following:

- Maintenance or removal of power lines on poles running along Old River Road going through the proposed campground.

**6. Comments unrelated to the Project.** Comments in three correspondences focused on the White's Ferry ferry operation, which occurred on private property and is not within the scope of the White's Ferry Development Concept Plan.

One correspondence provided historical context of White's Ferry and its significance to the area with a request to build a museum dedicated to ferries.

Other correspondences indicated the significance of the ferry to provide access and attract tourists to the site in addition to emphasizing the historical context.

# APPENDIX B: VISITOR CAPACITY

## INTRODUCTION

Visitor capacity was identified for the White's Ferry Area Development Concept Plan (Concept Plan) based on the *Visitor Capacity Guidebook* (2019) developed by the Interagency Visitor Use Management Council (IVUMC). The following appendix describes the visitor capacity identification process according to the Guidebook's four basic guidelines: 1) determine the analysis area, 2) review existing direction and knowledge, 3) identify the limiting attribute(s), and 4) identify capacity. Additional information on the IVUMC and their Visitor Use Management Framework is available at: <https://visitorusemanagement.nps.gov/>.

The primary goals of visitor use management are to maintain opportunities for high-quality visitor experiences and protect resources. Visitor capacity, a component of visitor use management, is "the maximum amounts and types of visitor use that an area can accommodate while achieving and maintaining the desired resource conditions and visitor experiences that are consistent with the purposes for which the area was established" (IVUMC 2019: 3). Determining visitor capacity is a necessary step to identifying strategies and actions to manage the amount of visitor use within established visitor capacities.

## GUIDELINE 1: DETERMINE THE ANALYSIS AREA

The Concept Plan re-imagines the north and south tracts of the White's Ferry area each as three concepts, which include several new and improved amenities and facilities. The pavilion and flexible space/group gathering areas proposed in the north tract concepts would provide visitor opportunities to gather, picnic, and/or participate in informal recreation. The campsites proposed in the south tract concepts would provide visitor opportunities to experience the park overnight. These new and improved amenities are proposed at existing open

spaces within the park that are geographically constrained by existing vegetation and the linear and oblong shape of the north and south tracts. The NPS could also implement and manage visitor capacity for the pavilion and campsites proposed in the north and south tract concepts, respectively, using a recreation fee, reservation, and permit system. For these reasons, the visitor capacity process focuses on the following analysis areas:

### North tract concepts

- Pavilion
- Shaded flexible space/group gathering area
- Sunny flexible space/group gathering area

### South tract concepts

- Group and individual campsites

The visitor capacity process for the south tract concepts does not focus on the proposed sunny flexible space/group gathering area, pavilion, and river access point because these amenities would be shared between the group and individual campsite users.

## GUIDELINE 2: REVIEW EXISTING DIRECTION AND KNOWLEDGE

Applicable laws and policies, prior applicable planning and guidance documents, existing conditions at White's Ferry, and future visitor uses at White's Ferry were reviewed to ensure that any legal requirements for identifying visitor capacity are met and to identify fundamental park resources and values, desired visitor experiences, desired resource conditions, and available open space for visitor use.

## Applicable NPS Laws, Policies, and Guidance

The National Parks and Recreation Act (1978) requires general management plans to include the identification of and implementation commitments for visitor carrying capacities for all areas of the unit. The NPS Management Policies (2006) states that “recreational activities and other uses that would impair a park’s resources, values, or purposes cannot be allowed” (NPS 2006: 98).

The *C&O Canal National Historical Park Foundation Document* (2013) identifies the fundamental resources and values (FRVs) and other important resources and values (OIRVs) for the park. FRVs and OIRVs identified in the *Foundation Document* that could be applicable specifically to the White’s Ferry area include the following (NPS 2013):

- **Historic districts – historic structures – archeology.** Nominated to the NRHP as a historic district. In addition to the park’s cultural landscapes and structures, prehistoric American Indian rock art has been documented at several locations within the park.
- **Towpath.** The C&O Canal parallels the Potomac River and its towpath, which extends for 184.5 miles and is fundamental to the park for both its continuity and recreational qualities. The towpath provides uninterrupted, nonmotorized access to the entire length of the park, connecting visitors to historic structures, the natural environment, and many other experiences along the canal.
- **Recreational opportunities.** Numerous Potomac River access points and a variety of towpath activities provide recreational opportunities for millions of park visitors annually. Recreational activities such as day- and through-hiking, bicycling, running, canoeing, boating, fishing, birding, wildflower walks, and picnicking continue to entice large numbers of visitors to the park. Camping and an increase in through-rider and through-hiker activity (i.e., bicyclists and hikers completing the entire length of the canal towpath, as well as those connecting to the towpath from regional trails) highlight the park’s diverse recreational opportunities.

- **Natural communities.** The park’s forested canopy, unique geology, and proximity to agricultural and natural areas comprise a wide range of habitat conditions that are fundamental to supporting diverse vegetation and wildlife communities. These include riparian areas like floodplain forests and wetlands. Within its boundaries, the park hosts native plant communities. Vegetation and wildlife common to these habitats and significant numbers of rare, threatened, and endangered species are represented. The park preserves the ecological integrity of these resources.
- **Solitude.** The value of solitude is an important contribution to the overall park experience. Solitude allows visitors to appreciate the history and natural surroundings of the canal.
- **Hydrologic resources including riparian areas.** Water is one of the park’s most distinguishing features. Owing to the character of these hydrologic resources is a long history of flooding along the Potomac River. Flood events have caused millions of dollars in damages to historic structures along the canal. Flooding is also largely responsible for the extraordinary biological diversity of the park, whose floodplain habitat comprises approximately 85% of the unit. Riparian areas at the C&O Canal National Historical Park are extensive, well preserved, and contain numerous rare, threatened, and endangered species.

## Existing Conditions

The **Current Conditions** chapter of the Concept Plan describes existing features and visitor uses, nearby recreational opportunities, and cultural and natural resources present at the White’s Ferry area.

Visitors can currently access the White’s Ferry area by vehicle, boat, bicycle, or on-foot. Vehicle parking is available at the existing parking lot on the north tract. A boat ramp and canoe/kayak ramp are available at the private property between the north and south tracts where the White’s Ferry Store

& Grill is located. Pedestrians and bicyclists access the White’s Ferry area via the C&O Canal Towpath. Although no bicycle infrastructure is present on nearby roadways, bicyclists can also access the White’s Ferry area via Whites Ferry Road, and River Road. There is no public transportation access to the White’s Ferry area.

## Future Visitor Uses

The Concept Plan expands ways visitors can experience the White’s Ferry area. The **Recommendations** chapter of the Concept Plan describes the potential range of visitors uses for each concept. This visitor capacity analysis will focus on the visitor uses summarized in **Table B-1** and **Table B-2** because they could occur in the analysis areas and for reasons described in the **Guideline 1** section.

**Table B-1.** North Tract Concepts - Future Visitor Uses

	<b>North Concept A: Recreational</b>	<b>North Concept B: Ecological</b>	<b>North Concept C: Agricultural</b>
<b>Gather and/or picnic at the pavilion</b>	Yes	Yes	No
<b>Gather and/or picnic at the shaded flexible space/group gathering area</b>	Yes	Yes	No
<b>Gather, picnic, and/or informally recreate at the sunny flexible space/group gathering area</b>	Yes	No	No

**Table B-2.** South Tract Concepts - Future Visitor Uses

	<b>South Concept A: Clustered</b>	<b>South Concept B: Hybrid</b>	<b>South Concept C: Dispersed</b>
<b>Camp at group campsite</b>	Yes	Yes	Yes
<b>Camp at individual campsite</b>	No	Yes	Yes

## Future Visitor Capacity

### North Tract

**Table B-3** presents the approximate area available for visitor use for each flexible space/group gathering area and the total visitor capacity of those spaces/areas. The flexible spaces/group gathering areas would offer opportunities for gatherings, picnics, and informal recreation activities. Based on professional knowledge and judgment, 100 square feet per person was identified as an appropriate minimum area of individuals gathering, picnicking, or participating in informal recreation. The visitor capacity was identified by multiplying the total approximate area by 100 square feet per person.

**Table B-3.** North Tract Concepts – Flexible Open Space Available Area and Visitor Capacity

	North Concept A: Recreational	North Concept B: Ecological
<b>Shaded flexible space/group gathering area approximate area (includes the pavilion)</b>	72,800 square feet	72,800 square feet
<b>Sunny flexible space/group gathering area approximate area</b>	43,200 square feet	NA
<b>Total approximate area</b>	116,000 square feet	72,800 square feet
<b>Visitor capacity</b>	1,160 persons	728 persons

### South Tract

**Table B-4** presents the visitor capacity of the group and individual campsites for each south tract concept. During the development of the south tract concepts, each group campsite was sized to accommodate the number of people identified in **Table B-4** using the *NPS Campground Design Guidelines* (2021) guidelines for group camping. Guidelines in this document was also used to size the individual campsites.

In South Concept B: Hybrid, the visitor capacity of the individual campsites, which would be drive-in campsites, was identified by multiplying the ten individual campsites by eight people per campsite. Eight people was selected because existing drive-in campsites within the C&O Canal National Historical Park are limited to eight people per campsite.

In South Concept C: Dispersed, the visitor capacity for the individual campsites was identified by multiplying the eight individual campsites by eight people per campsite. Eight people was selected because:

- The campsites would have the same facilities as the campsites (i.e., fire ring, area for tents, and a picnic table) in South Concept B: Hybrid except for parking at the campsite.

- The C&O Canal National Historical Park does not have regulations regarding the maximum number of people per hiker-biker campsite.
- The *NPS Campground Design Guidelines* (2021) does not provide guidelines for the maximum number of people per hiker-biker campsite.

**Table B-4.** South Tract Concepts - Campsite Visitor Capacity

	<b>South Concept A: Clustered</b>	<b>South Concept B: Hybrid</b>	<b>South Concept C: Dispersed</b>
<b>Group campsite A</b>	25 persons	25 persons	25 persons
<b>Group campsite B</b>	20 persons	20 persons	20 persons
<b>Group campsite C</b>	15 persons	20 persons	NA
<b>Group campsite D</b>	15 persons	NA	NA
<b>Individual campsites</b>	NA	80 persons	64 persons
<b>Total</b>	<b>75 persons</b>	<b>145 persons</b>	<b>109 persons</b>

## Future Visitor Use Levels

### North Tract

Future visitor use levels for the north tract, as a whole, were estimated using the vehicle capacity of the improved existing parking lot, visitor use data available for other locations with similar amenities and facilities within the C&O Canal National Historical Park, and professional judgment according to the following steps.



## 1. Determine the total parking spaces available for visitor use

**Table B-5** presents the total visitor parking spaces that could be available for visitor use in the north tract concepts. The number of total visitor parking spaces include regular vehicle parking spaces and nine (9) spaces that accommodate vehicles towing boat trailers.

**Table B-5.** North Tract Concepts - Parking Lot Capacity

	North Concept A: Recreational	North Concept B: Ecological	North Concept C: Agricultural
<b>Parking spaces (includes 9 spaces that accommodate vehicles towing boat trailers)</b>	91	91	96
<b>Visitor use level</b>	228 persons	228 persons	240 persons

## 2. Determine an appropriate recreation visit person-per-vehicle (PPV) multiplier

To better understand future potential visitor use levels at the north tract, visitor use counting data for other locations with similar amenities and features within the C&O Canal National Historical Park were reviewed.

The NPS collects visitor use statistics that address how many people visit parks and how long they stay. Park units apply a variety of technologies and procedures to estimate recreation and non-recreation visits and overnight stays. Examples of visitor use data and counting procedures available for parks include, but are not limited to, visits by type by month, traffic counts by month, average daily traffic counts, persons-per-vehicle (PPV) multiplier, and average length-of-stay.

Other locations within the park were identified for review based on if they have similar amenities and facilities to those proposed in the north tract concepts (i.e., parking, picnic tables, and restrooms) and PPV multipliers were available for that location. These locations, their amenities and facilities, and recreation visit PPV are provided in **Table B-6** (NPS 2021, 2022). Locations that have similar amenities and facilities, but also have boat ramps, canoe/kayak ramps, and food were also considered because the north tract's parking lot has and is anticipated to continue to provide parking for visitors using the boat ramp and patronizing White's Ferry Store & Grill located on the adjacent private property.

Recreation visit PPV multipliers associated with the similar locations were used to identify an appropriate recreation visit PPV multiple for the north tract concepts. Recreation visit PPV multipliers ranged from 1.5 to 2.5.

**Table B-6.** Similar Locations within the C&O Canal National Historical Park

Mile	Location	Boat ramp	Canoe/ Kayak ramp	Food	Parking	Picnic tables	Restrooms	PPV
22.8	Seneca	No	Yes	No	Yes	Yes	Yes	1.5
42.2	Monocacy Aqueduct	Yes	No	No	Yes	Yes	Yes	1.5
44.6	Nolands Ferry	Yes	No	No	Yes	Yes	Yes	2.5
54	Brunswick	Yes	No	No	Yes	No	Yes	2.5
64.9	Dargan Bend	Yes	No	No	Yes	Yes	Yes	2.5
85.5	Big Slackwater	Yes	No	No	Yes	Yes	Yes	2.5
99.2	Lock 44	No	No	No	Yes	No	Yes	2.5
106.8	Dam 5	No	No	No	Yes	No	Yes	2.5
166.7	Oldtown	No	No	Yes	Yes	Yes	Yes	2.5
175.5	Lock 75 Area	No	No	No	Yes	Yes	Yes	2

### 3. Estimate visitor use levels

Visitor use for the north tract, as a whole, were estimated in the event that the parking lot is at vehicle capacity using the visitor use data from similar locations. The visitor use level of the north tract at any given time during park hours was calculated for each north tract concept by multiplying the number of parking spaces for each concept by a 2.5 recreation visit PPV (**Table B-5**). This PPV was selected because it was the PPV for seven out of ten of the similar location and is the maximum PPV.

#### South Tract

The vehicle capacity of the parking areas proposed in the south tract concepts was not used to estimate future use levels for the south tract, as a whole, for the following reasons:

- Organized groups using the group campsites could carpool or use bus/van services, which park overnight off-site, to be dropped off/picked up.

- Organized groups using the group campsites could use bus/van services that park off-site.
- The parking of buses, large vans, or trailers carrying non-motorized watercraft may alter the total number of parking spaces available.
- The north tract parking lot could be used for overflow parking if needed.
- Campsite users could arrive via boat, bicycle, or on-foot, instead of by vehicle.

### GUIDELINE 3: IDENTIFY THE LIMITING ATTRIBUTE

The limiting attribute is the attribute that most constrains the analysis area’s ability to accommodate visitor use. Examples of limiting attributes include physical (e.g., facility infrastructure), biological (e.g., resource conditions), social (e.g., visitor experience), and/or managerial attributes.

In line with the values, desired visitor experiences, and desired resource conditions identified in the *C&O Canal National Historical Park Foundation Document* (2013), the proposed elements of the north and south tract concepts offer opportunities for recreation and solitude that allows visitors to appreciate the history and natural history of the canal. These opportunities build off and are respectful of the park’s C&O Canal Towpath, natural communities, and hydrologic resources. The north and south tract concepts propose elements in existing open spaces in order to protect existing forested areas and riparian habitat. The north and south tract concepts also propose expanding the forested landscape and improving riparian buffers to provide additional wildlife habitat; prevent or mitigate erosion; and/or enhance the White’s Ferry area’s ecological and floodplain capacity. For these reasons, the priority to preserve and enhance existing natural communities and hydrological resources within the White’s Ferry area was identified as the most limiting attribute for the analysis areas.

### GUIDELINE 4: IDENTIFY CAPACITY

#### Visitor Capacity

The visitor capacity for the north and south tract concepts was identified based on existing conditions, the proposed amenities and facilities, and professional knowledge and judgment. The visitor capacity identified for each concept is presented in **Table B-7**, with how these visitor capacities were identified explained in the subsequent sections.

**Table B-7.** White’s Ferry Area – Visitor Capacity

Concept	Visitor Capacity
<b>North Concept A: Recreational</b>	228 persons
<b>North Concept B: Ecological</b>	228 persons
<b>North Concept C: Agricultural</b>	Not applicable
<b>South Concept A: Clustered</b>	75 persons
<b>South Concept B: Hybrid</b>	145 persons
<b>South Concept C: Dispersed</b>	109 persons

## North Tract

For North Concept A: Recreational and North Concept B: Ecological, visitor capacity managed according to the flexible space/group gathering area visitor capacity could create impacts on the north tract's natural resources as a result of visitor overflow parking outside of the parking lot. Visitor parking in undesignated areas could also compromise desired visitor experiences by reducing the area available for recreation opportunities, create pedestrian-bicycle-vehicle conflicts, limit access of NPS or other official vehicles (e.g., emergency vehicles) to the park, and create impacts on adjacent private property. For these reasons, the visitor use level based on parking lot capacity and similar locations within the C&O Canal National Historical Park was used to identify the visitor capacity. Therefore, the visitor capacity for both North Concept A: Recreational and North Concept B: Ecological is approximately 228 persons.

In North Concept C: Agricultural, the only visitor use available would be parking. Therefore, a visitor capacity number in terms of persons is not applicable.

The visitor capacity identified for the north tract is accompanied by the following caveats:

- Additional visitors may access the north tract via boat, bicycle, or on-foot.
- Visitors parking in the parking lot may not use the north tract's amenities and facilities. Visitors may park in the parking lot to access the C&O Canal Towpath or use the boat ramp and patronize White's Ferry Store & Grill on the adjacent private property. South tract campsite users may also use the north tract parking lot as overflow parking if needed.
- The parking of buses, large vans, or additional trailers carrying watercraft may alter the number of parking spaces available to other visitors.

- The parking lot would need to be updated to comply with the minimum number of required accessible parking spaces defined by the 2015 Architectural Barriers Act Accessibility Standards (ABAAS), which could alter the total number of parking spaces available.
- Parking spaces available for visitor use may be occupied by official use vehicles (i.e., NPS, U.S. Park Police, partner organization, and emergency). Official use vehicle parking may alter the total number of parking spaces available to visitors.

## South Tract

Visitor capacity for the south tract concepts ranges from approximately 75 to 145 persons, depending on the concept. Visitor capacity for the south tract was identified based on the campsite visitor capacity based on the following reasons:

- Visitor access and use of the south tract would be limited to those visitors using the campsites. A gate at the north end of the existing access road would help maintain campsite user privacy.
- Visitor capacity at the campsites could be implemented at the campsites through a recreation fee, reservation, and permit system.
- The *NPS Campground Design Guidelines* (2021) document was used to appropriately size the group and individual campsites during the development of the south tract concepts.

## Management Strategies and Action

The NPS could implement the identified visitor capacity at the north and south tracts through the following management strategies and actions:

- **Reservation and permit system and registration limits:** The NPS could require groups greater than a specific size using the north tract's pavilion and flexible space/group gathering area to apply to use these areas through a recreation fee, reservation, and permit system. The NPS would also require organized groups of any size using the south tract's group campsites to use such a system. Permit rules could limit the number of vehicles and/or total number of people.
- **Park staffing:** NPS staff could patrol the White's Ferry area during high-use times to ensure parking is limited to the parking areas, reserved groups do not exceed maximum group size allowed, the individual campsites do not exceed the maximum number of individuals allowed per campsite, and visitor use activities do not encroach on the park's natural resources.
- **Online educational messaging:** Via the park's website, the NPS could inform visitors that the park contains a limited number of parking spaces, provide alternative ways to access the park (e.g., walking or bicycling along the C&O Canal Towpath), manage visitor expectations by providing information about high-use times, and encourage visitors to select less popular times to visit.
- **Educational signage:** The NPS could install signs noting the importance of the park's natural and cultural resources. Signs noting that parking is prohibited outside of the designated parking area could also be installed.

As the potential concepts proposed in this Concept Plan are further developed, the visitor capacity and management strategies and actions would be refined. A monitoring strategy to determine whether management strategies and actions are implementing visitor capacity effectively would also be developed. As the activities and improvements identified in the concepts are implemented, the NPS would monitor, evaluate, and adjust management actions, if needed.

## REFERENCES

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