

**JOHN A. LAWRENCE**  
STATE REPRESENTATIVE  
13<sup>TH</sup> LEGISLATIVE DISTRICT



**HOUSE OF REPRESENTATIVES**  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

**HARRISBURG OFFICE**  
P.O. BOX 202013  
HARRISBURG, PA 17120  
(717) 260-6117

**JENNERVILLE OFFICE**  
1 COMMERCE BLVD., SUITE 200  
WEST GROVE, PA 19390  
(610) 869-1602

John Hallas  
Director of Pennsylvania State Parks  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17105

RE: Comment Regarding Proposed Master Plan for Big Elk Creek State Park

October 20, 2025

Dear Director Hallas –

Thank you for the opportunity to comment on the proposed master plan for Big Elk Creek State Park (Big Elk.)

My initial comments relate to the proposed plan submitted by SMP Architects (SMP.)

#### **SMP EXECUTIVE SUMMARY MAKES THE CASE FOR BIG ELK PRESERVE STATUS**

In the Executive Summary of the proposed Master Plan, SMP states:

*The park extends an important wildlife corridor and provides refuge for an array of rare and threatened species. The property encompasses 3.5 miles of Big Elk Creek, a tributary of the Elk River and the Chesapeake Bay, and provides refuge to more than 690 different plant species, including 15 species that are considered endangered, rare, threatened or vulnerable. Impacts from development, climate change, and other threats currently pose unprecedented risks for biodiversity. This property supports the local flora and fauna, conserving important open space and the associated habitats.<sup>1</sup>*

Very simply, these introductory comments point towards the need to reestablish preserve status at Big Elk Creek State Park. SMP, the consultant hired by DCNR, establishes at the

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<sup>1</sup> The pages in the proposed master plan are not numbered, which makes it difficult to properly reference. These remarks are found in the Executive Summary, second paragraph, which is on page 4 of the 100 page PDF.

outset of its proposed plan that Big Elk “provides refuge for an array of rare and endangered species.” SMP goes on to note that “impacts from development” are a concern at Big Elk, and that a key feature of the property is “conserving important open space.” These features are directly in line with preserve status for Big Elk.

## SMP OMITTS ANY REFERENCE TO THE WHITE CLAY CREEK PRESERVE IN THE “PARK ORIGINS” SECTION

Under the section entitled “Purpose of Plan,” SMP outlines their view of the Park Origins.<sup>2</sup> I strongly dispute the history compiled by SMP, as it completely omits any reference to the fundamental reason the relevant properties were acquired – which was as an addition to the White Clay Creek Preserve.<sup>3</sup>

## SMP REFERENCES PRESERVATION AS PART OF THE PARK PURPOSE STATEMENT – BUT NOT PRESERVATION OF THE LAND

In the Park Purpose Statement, SMP states:

*Preservation: Reflect and preserve the character-defining cultural and natural history of the lands comprising Big Elk Creek State Park, as they reflect the history of the site and its surroundings.<sup>4</sup>*

It is astonishing that SMP references preservation as part of the “purpose” of Big Elk – but fails to include that preservation of the land was the guiding intent of those involved in the 15 year-long acquisition process. SMP recasts preservation in terms of “cultural and natural history of the lands” – as opposed to preservation of the land itself. While I do not dispute the history of the greater Big Elk area is of interest, it is a narrower focus than the preservation of the land as part of a wilderness/low-impact use area. Preservation of the land itself was, without doubt, the key factor in the sale of these lands to DCNR.

## SMP WORDSMITHS THE LAND DESIGNATION AT BIG ELK

In a section entitled “Park Significance Statements,” SMP states:

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<sup>2</sup> Pages 6-7 of the 100 page PDF.

<sup>3</sup> 1,000 acres once owned by Campbell’s Soup scion are now a Pa. preserve, by Frank Krummer, Philadelphia Inquirer, Jul. 21, 2020

<sup>4</sup> Page 9 of the 100 page PDF.

*The 1,700 acres of protected public lands of Big Elk Creek State Park, along with connectivity to thousands of additional acres of conserved public land is regionally significant, providing ecological habitats and services and recreational and educational opportunities.<sup>5</sup>*

Here, SMP delicately avoids stating the obvious – Big Elk connects adjoining preserved wilderness areas that span three states. Judiciously using the term “protected” land to describe Big Elk while noting adjoining areas are “conserved” indicates a difference in status and treatment between the two. I regret the need for SMP to take such steps. Big Elk should enjoy the same status as the White Clay Creek Preserve and other adjoining areas.

### SMP ERRS IN IDENTIFYING BIG ELK’S ADJOINING PROPERTIES

On page 11 of the 100 page PDF, SMP states:

#### Regional Connectivity

*Big Elk Creek State Park adjoins the 5,300 acre Fair Hill Natural Resource Management Area in Maryland and the White Clay Creek State Park in Delaware. The park contributes to the 31% of Chester County land that is preserved as open space.*

This statement is incorrect. The White Clay Creek Preserve adjoins the White Clay Creek State Park in Delaware. Since Big Elk was removed from the White Clay Creek Preserve, it no longer adjoins the White Clay Creek State Park in Delaware.

Some may speculate that SMP’s mistaken identification is a parapraxis. Regardless of the reason for the error, I submit that it points to the utter insanity of the path that DCNR has chosen to pursue – managing White Clay Creek Preserve and Big Elk as two separate entities with two separate plans – despite the fact that the two are within walking distance of one another, and that Big Elk was always intended to be part of the White Clay Creek Preserve.

### SMP REPEATS DEBUNKED CLAIMS FALSELY INDICATING “MAJORITY” SUPPORT FOR OVERNIGHT ACCOMMODATIONS AT BIG ELK

While referencing DCNR’s 2023 online Big Elk survey, SMP resurrects DCNR’s false narrative that “a majority of respondents supported the concept of overnight accommodations.”<sup>6</sup> It is very concerning to me that SMP would recycle this misleading DCNR talking point. This false claim has been addressed in several forums, but for the sake of simplicity, I will simply cite

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<sup>5</sup> Page 9 of the 100 page PDF.

<sup>6</sup> Page 24 of the 100 page PDF.

pages 9-11 of my February 6, 2025 letter to DCNR.<sup>7</sup> The idea that a groundswell of public support existed or exists for overnight accommodations at Big Elk is simply incorrect.

## DISCUSSION OF THE TASK FORCE POSITION ON PRESERVE STATUS FOR BIG ELK

Under a section entitled “What We Heard – Task Force Process,” SMP states:

*Though not a component of the physical planning of the park, a majority of task force members felt strongly about the name of the property. A significant portion of several task force meetings included discussion of the merits of “Big Elk Creek Preserve” versus “Big Elk Creek State Park”. Most task force members took the position to include of the word “preserve” within the official name of the property. In the discussion for inclusion of the word “preserve” in Big Elk Creek’s name, management and stewardship would be congruent with White Clay Creek Preserve. DCNR has taken into consideration use of the word “preserve” in the final state park name, which will be designated following the completion of the recently initiated Cultural Resources Management Plan.<sup>8</sup>*

Although I disagree with the analysis in the aforementioned paragraph, I appreciate the inclusion of the critical fact that a majority of the DCNR-assembled task force supports redesignation of Big Elk Creek State Park to Big Elk Creek Preserve. This is an important point that merits strong consideration from DCNR.

I disagree with SMP’s conclusory statement asserting this conversation is “not a component of the physical planning of the park.” Preserve status is fundamental to any proposed “physical planning” of Big Elk. As DCNR maintains and manages the White Clay Creek Preserve in a manner distinct from that of a standard state park, the maintenance and management of Big Elk is wholly dependent upon whether DCNR reverts to preserve status for Big Elk or insists on continuing with the new state park designation.

SMP’s analysis regarding the inclusion of the word “preserve” in the name is improper. To accurately reflect the position of a majority of the task force, the following SMP-authored sentences from page 25 of the 100 page PDF should be reworded.

### SMP’S INCORRECT ANALYSIS

*Most task force members took the position to include of the word “preserve” within the official name of the property. In the discussion for inclusion of the word “preserve” in Big Elk Creek’s name, management and stewardship would be congruent with White Clay Creek Preserve.*

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<sup>7</sup> This letter is attached to this comment.

<sup>8</sup> Page 25 of the 100 page PDF.

## CORRECT ANALYSIS

*Most task force members took the position to officially redesignate Big Elk Creek State Park as Big Elk Creek Preserve. In the discussion regarding redesignation of Big Elk Creek's name, the task force intended that management and stewardship would be congruent with White Clay Creek Preserve.*

## ADDITIONAL COMMENTS

I submit the entirety of my letter to DCNR dated February 6, 2025 as part of this comment regarding the Big Elk Creek State Park proposed master plan. The contents of that 62-page document – particularly as it relates to preserve status for Big Elk – remain fundamental to any proposed plans for this treasured space.

Any proposed construction at Big Elk must comply with applicable township zoning codes. It is troubling to me that there is no mention of this, even in passing, in the proposed master plan.

Fair Hill Natural Resources Area charges a parking fee. Parking lots within Big Elk should be constructed in a manner that is conscious of the fact that some Fair Hill visitors may seek to park at Big Elk to avoid parking fees. This type of activity must be discouraged to the extent possible.

The section of Walker Road that adjoins Big Elk is one-lane wide. Adding a parking area along this section of Walker Road is, in my view, challenging given the width of the road.

Again, thank you for the opportunity to comment on this matter. Please do not hesitate to contact me directly at any time on this important issue.

Kind Regards –

A handwritten signature in blue ink, appearing to read "John Lawrence", is written over the printed name.

John Lawrence  
State Representative  
Commonwealth of Pennsylvania