

S.A.V.E.

Safety, Agriculture, Villages & Environment, Inc.

December 30, 2023

Secretary Cindy Adams Dunn
PA Department of Conservation & Natural Resources
400 Market Street
P.O. Box 8767
Harrisburg, PA 17105-8767

Re: Big Elk Creek State Park & White Clay Creek Preserve

Dear Secretary Dunn,

The Board of Directors of S.A.V.E. commends the many efforts of Pennsylvania DCNR to protect the natural resources of southern Chester County and throughout the Commonwealth. However, we have serious concerns about the proposal for the inclusion of extensive infrastructure—specifically, campgrounds—at Big Elk Creek State Park, demarcated in September 2022.

We have heard from several supporters who attended DCNR stakeholder meetings in July regarding the lands of Big Elk Creek. Many subsequently attended the public meeting on November 6th at Lincoln University when the proposal for campground facilities was first revealed. All were dismayed by this unexpected development and by DCNR's refusal to entertain questions.

Over several years, a well-respected conservationist, George Strawbridge, Jr., transferred lands in Elk, Franklin, and New London Townships to DCNR. He did so with the understanding that the lands would remain unchanged without development. Furthermore, every public characterization of these transfers—including the Big Elk Creek property in question—was that the lands would continue to be preserved, similar to White Clay Creek Preserve (WCCP) in London Britain Township, as well as Fair Hill Natural Resource Management Area in Maryland which also joins the Big Elk Creek lands.

One of our numerous concerns is that the lands of the Big Elk Creek are now slated to be separated from WCCP, rather than contribute to its open space and passive recreation. These lands not only possess unique ecological and geological characteristics, but in combination with their neighbors should remain a preserve with the many attributes and services of wilderness which will benefit Commonwealth residents.

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The Keystone Recreation, Park, and Conservation Fund Act (1993) defines natural areas as “any area of land, water, or both land and water, which is important in preserving flora, fauna, native ecological systems, geological, natural historical, open space, scenic or similar features of scientific or educational value benefiting the citizens of this Commonwealth.” Replacing these natural areas with built infrastructure and considerable hardscape would reduce the public value of these lands which have heretofore been preserved for generations.

The Conservation and Natural Resources Act (1995) tasks DCNR with the power and duty “to see that conveniences and facilities for the transportation, shelter, comfort, and education of people shall be so designed and constructed as to retain, so far as may be, the **naturalistic appearance** of State Park areas, surroundings, and approaches, and **conceal the hand of man as ordinarily visible** in urban, industrial, and commercial activities” (emphasis mine). Extending conveniences and facilities for overnight accommodations would bring the visibility and activities of man to the very forefront of the Big Elk Creek.

The Land and Water Conservation Fund Act (1965) requires states to operate acquired property for the benefit of public, outdoor recreational use, but does not advance that the natural features of such a property should be compromised and converted into permanent infrastructure. Providing rustic campsites—as endorsed by DCNR’s very own July stakeholder meetings—would achieve the same goal espoused by this landmark legislation.

We are troubled by DCNR’s lack of transparency in formulating the plan for campground facilities. Officials and residents of Elk and Franklin Townships have not been sufficiently included in this planning process. Surely, after stewarding these lands for these many years, they understand best the negative externalities which would impact their area. And lastly, by all indications DCNR’s July meetings arrived at a consensus to respect the history of the lands of Big Elk Creek and to allow for passive recreation, not for the big build first revealed on November 6.

S.A.V.E.’s mission is to preserve the quality of life and community character of southern Chester County. For over 25 years, we have advocated Smart Growth principles which support safe transportation, agriculture, villages, and the environment. We ask you to reconsider the inclusion of campground facilities as proposed in the master plan for the Big Elk Creek State Park.

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Respectfully,



George Hundt, Jr.

S.A.V.E. Executive Director

director@savepa.org

cc: PA Governor Josh Shapiro
Deputy Secretary John Norbeck, Parks & Forestry
Director John Hallas, State Parks
US Representative Chrissy Houlahan
PA Senator Carolyn Comitta
PA Senator John Kane
PA Representative John Lawrence
PA Representative Christina Sappey
Chester County Commissioners
Elk Township Board of Supervisors
Franklin Township Board of Supervisors
London Britain Township Board of Supervisors
New London Township Board of Supervisors