

United States Department of the Interior  
National Park Service

National Register of Historic Places  
Registration Form

VLR 3-20-96  
NRHP draft

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in How to Complete the National Register of Historic Places Registration Form (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name Upper Brandon Plantation

other names/site number VDHR File No. 74-27

2. Location

street & number 2300 Upper Brandon Road N/A ☐ not for publication

city or town Spring Grove ☒ vicinity

state Virginia code VA county Prince George code 149 zip code 23881

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this ☒ nomination ☐ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 38 CFR Part 60. In my opinion, the property ☒ meets ☐ does not meet the National Register criteria. I recommend that this property be considered significant ☐ nationally ☐ statewide ☒ locally. (☐ See continuation sheet for additional comments.)

[Signature] 4/21/97  
Signature of certifying official/Title Date

Virginia Department of Historic Resources  
State or Federal agency and bureau

In my opinion, the property ☐ meets ☐ does not meet the National Register criteria. (☐ See continuation sheet for additional comments.)

\_\_\_\_\_  
Signature of certifying official/Title Date

\_\_\_\_\_  
State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that the property is

	Signature of the Keeper	Date of Action
<input type="checkbox"/> entered in the National Register <input type="checkbox"/> See continuation sheet.	_____	_____
<input type="checkbox"/> determined eligible for the National Register <input type="checkbox"/> See continuation sheet.	_____	_____
<input type="checkbox"/> determined not eligible for the National Register.	_____	_____
<input type="checkbox"/> removed from the National Register.	_____	_____
<input type="checkbox"/> other, (explain): _____	_____	_____

Upper Brandon Plantation  
Name of Property

Prince George Co., Va.  
County and State

### 5. Classification

**Ownership of Property**  
(Check as many boxes as apply)

- ☒ private  
☐ public-local  
☐ public-State  
☐ public-Federal

**Category of Property**  
(Check only one box)

- ☒ building(s)  
☐ district  
☐ site  
☐ structure  
☐ object

**Number of Resources within Property**  
(Do not include previously listed resources in the count.)

Contributing	Noncontributing	
3	6	buildings
3	2	sites
2	3	structures
0	0	objects
8	11	Total

**Name of related multiple property listing**  
(Enter "N/A" if property is not part of a multiple property listing.)

N/A

**Number of contributing resources previously listed  
in the National Register**

N/A

### 6. Function or Use

**Historic Functions**  
(Enter categories from instructions)

DOMESTIC: single dwelling  
AGRICULTURE/SUBSISTENCE: outbuildings  
AGRICULTURE/SUBSISTENCE: fields

**Current Functions**  
(Enter categories from instructions)

DOMESTIC: corporate retreat  
AGRICULTURE/SUBSISTENCE: outbuildings  
AGRICULTURE/SUBSISTENCE: fields

### 7. Description

**Architectural Classification**  
(Enter categories from instructions)

EARLY REPUBLIC: Early Classical Revival

**Materials**  
(Enter categories from instructions)

foundation Brick

walls Brick

roof Slate

other

### Narrative Description

(Describe the historic and current condition of the property on one or more continuation sheets.)

Upper Brandon Plantation

Name of Property

Prince George Co., Va.

County and State

## 8. Statement of Significance

### Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- ☒ **A** Property is associated with events that have made a significant contribution to the broad patterns of our history.
- ☐ **B** Property is associated with the lives of persons significant in our past.
- ☐ **C** Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- ☐ **D** Property has yielded, or is likely to yield, information important in prehistory or history.

### Criteria Considerations

(Mark "x" in all the boxes that apply.)

Property is:

- ☐ **A** owned by a religious institution or used for religious purposes.
- ☐ **B** removed from its original location.
- ☐ **C** a birthplace or grave.
- ☒ **D** a cemetery.
- ☐ **E** a reconstructed building, object, or structure.
- ☐ **F** a commemorative property.
- ☐ **G** less than 50 years of age or achieved significance within the past 50 years.

### Narrative Statement of Significance

(Explain the significance of the property on one or more continuation sheets.)

## 9. Major Bibliographical References

### Bibliography

(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)

#### Previous documentation on file (NPS):

- ☐ preliminary determination of individual listing (36 CFR 67) has been requested
- ☐ previously listed in the National Register
- ☐ previously determined eligible by the National Register
- ☐ designated a National Historic Landmark
- ☐ recorded by Historic American Buildings Survey # \_\_\_\_\_
- ☐ recorded by Historic American Engineering

### Areas of Significance

(Enter categories from instructions)

ARCHITECTURE

AGRICULTURE

### Period of Significance

1825-1859

### Significant Dates

1825

1859

### Significant Person

(Complete if Criterion B is marked above)

### Cultural Affiliation

### Architect/Builder

#### Primary location of additional data:

- ☒ State Historic Preservation Office
- ☒ Other State agency
- ☐ Federal agency
- ☒ Local government
- ☐ University
- ☒ Other

Name of repository: Va. Historical Society

Upper Brandon Plantation  
Name of Property

Prince George Co., Va.  
County and State

## 10. Geographical Data

Acreage of Property 2,138.5 acres

### UTM References

(Place additional UTM references on a continuation sheet.)

1 

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 Zone Easting Northing

2 

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3 

--	--	--	--	--	--	--	--	--	--

 Zone Easting Northing

4 

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☐ See continuation sheet

### Verbal Boundary Description

(Describe the boundaries of the property on a continuation sheet.)

### Boundary Justification

(Explain why the boundaries were selected on a continuation sheet.)

## 11. Form Prepared By

name/title Helen S. T. Reed  
organization Reed Restoration date Dec. 31, 1995  
street & number Box 29053 telephone (804) 784-5619  
city or town Richmond state Va. zip code 23229

### Additional Documentation

Submit the following items with the completed form:

#### Continuation Sheets

#### Maps

A USGS map (7.5 or 15 minute series) indicating the property's location.

A Sketch map for historic districts and properties having large acreage or numerous resources.

#### Photographs

Representative black and white photographs of the property.

### Additional Items

(Check with the SHPO or FPO for any additional items)

### Property Owner

(Complete this item at the request of SHPO or FPO.)

name James River Corp., Mr. Pete Trexler  
street & number 1802 Upper Brandon Road telephone (804) 866-5000  
city or town Spring Grove state Va. zip code 23881

**Paperwork Reduction Act Statement:** This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 et seq.).

**Estimated Burden Statement:** Public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reduction Projects (1024-0018), Washington, DC 20503.

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Upper Brandon Plantation  
Prince George Co., Va.

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Description

Upper Brandon is a nineteenth-century plantation complex on the James River in Prince George County, Virginia. Built in two phases, 1825 and 1859, the brick house is noteworthy for its large-scale, five-part plan, and its sophisticated woodwork derived from Asher Benjamin's *pattern book*. The farmland has been in cultivation since the seventeenth century.

The nomination consists of eight contributing resources (site plan 1-8): main house and connected dependencies; overseer's house; slave house; garden archaeological site and reconstruction; Sunbury field archaeological site; smokehouse; icehouse; and slave cemetery.

The Upper Brandon residence with two dependencies (see plan) was completed on the south bank of the James River in 1825 by William Byrd Harrison; two wings were added to the main structure in 1859 following his second marriage. William Byrd Harrison (1800-1870), an 1820 graduate of Harvard University, gave careful attention to the construction. The ornate interior woodwork and exterior detail were achieved by accomplished workmen using Asher Benjamin's popular

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Prince George Co., Va.

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pattern book, The American Builder's Companion, first issued in Boston in 1806 with the help of Daniel Raynerd, who subsequently worked in Virginia. The itinerant craftsmen involved may be responsible for several other equally important contemporary Virginia houses discussed later (Magnolia Grange, Chesterfield Co.; Hampstead, New Kent Co.; Horn Quarter, King William Co.; the Governor's Mansion in Richmond; and Lower Brandon alterations). The style would be described as Federal or early Classical Revival.

The 1825 floor plan shows a large Tidewater rectangular dwelling with a center hall and four corner rooms, repeated in the basement and on the second floor, each floor with approximately 3,756 square feet. The smaller dependencies had similar configurations with the kitchen on the west combining the hall and cooking area. This five-part Palladian format was established among the grander Virginia plantations such as Carter's Grove, Westover, Blandfield, Mount Airy, Lower Brandon, and Battersea. The brickwork is Flemish bond, and the roof is slate; smaller bricks are used for the dependencies. Classical porches complete the two facades using the Ionic order on the south land entrance and the Composite order on the north river entrance. Academic mutule blocks from Benjamin appear under the cornice. An 1870 photograph shows a parapet railing (not restored) identical to that at Hampstead (Benjamin, plate 53) and similar to the recently restored railing at the

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Prince George Co., Va.

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Governor's Mansion. The widow's walk illustrated in the same photo with a simple railing has been restored instead to a Chinese Chippendale design.

The interior woodwork is especially fine. It is all original with the exception of the second-floor southwest bedroom mantel. The hall contains a guilloche banded arch with the keystone motif from Benjamin (plate 33); elaborately shaped overdoors with scroll and leaf consoles from Benjamin (also plate 33); and a grand staircase with double fan shaped brackets and simple square balisters. At Magnolia Grange, Ionic columns and the keystone in the hall are identical to Upper Brandon, and the northwest office mantel is supported by leaf and scroll elements similar to the Upper Brandon door consoles. The four upstairs Magnolia Grange mantels with cutout geometric panels relate to Upper Brandon mantels. At Hampstead the same Benjamin keystone (plate 33) appears in the brick arch above the entrance door. The handsome Benjamin parapet railing is original, and the design (plate 53) is likewise the source for the Upper Brandon example in the old photograph. Similar mutule, mantels, shaped overdoors, and Ionic hall columns directly relate Hampstead craftsmen to Upper Brandon. Research linking these houses possibly to Daniel Raynerd has yet to be explored although the same workmanship is evident. The Upper Brandon hall has been returned to the original light green paint although photographs show a false grain

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mahogany finish in the later nineteenth century. The unusual doors each have eight cross shaped panels, a design from a yet unidentified source.

The northeast and southeast parlors are connected by a large double door, making the space interchangeable according to the light and seasons. The southeast mantel is especially intricate with open arches and full Ionic colonettes.

The northwest dining room and southwest room have finely carved arches flanking the mantels. A similar configuration appears in the four mantel walls of the bedrooms above as well as at Horn Quarter. The southwest room, now used as a breakfast room, was altered in size in the 1980s renovation to accommodate a first floor coatroom and lavatory. Elaborate plaster ceiling medallions and cornices found in the comparative houses may once have been in Upper Brandon, but no evidence or photographs document this.

The large second floor hall is approached from the stair landing which crosses the land facade window in an elementary construction. The river facade includes a matching three-part window. Simple stairs rise to an unfinished attic, and a ladder gives access to the rooftop widow's walk.

Underground passages or hyphens connect the dependencies to



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the main house, facilitating service from the kitchen and access to both buildings in bad weather. Small windows on the north side illuminate the passages; lower walls make the land elevation inconspicuous due to the slanted roof.

The west dependency served as a large kitchen and laundry room with two chambers above. The east dependency served as an office and/or schoolroom. The small center hall divides two rooms with two chambers above. Simple utilitarian woodwork characterizes both buildings.

In 1859, the main residence was enlarged on each side, adding a library to the east and a pantry and back stairs to the west. Triple-hung sashes on the north gave access to small porches with unusual Ionic columns. The spaces above served as bathrooms. To accommodate the back stairs, a side hall was cut through the northwest bedroom, eliminating the fireplace.

Upper Brandon remained in the Harrison family until 1948 when it was sold by F. Otway Byrd. It was owned by Fred Watkins until the James River Corporation acquired the property in 1985 for a corporate retreat. The restoration was done to the highest standards with minimal changes: adding the coat room as noted, renovating the bathrooms and kitchen, adding heat and air conditioning, and dividing the hall/dining room door to simplify serving.

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Another original building on the property is the overseer's house (2) moved in 1986 from its original site ( 2 ) and enlarged with two wings to serve as an office. Only some doors, windows, upstairs flooring, and a partial staircase remain. It was documented by Colonial Williamsburg Agricultural Building Project CW81.170.

Nearby a slave house (3) with two rooms and a central fireplace remains, the sole survivor of three such buildings noted in 1948. It was restored in 1987 with the help of Colonial Williamsburg (Ed Chappell CW81-170) and serves as a museum now.

The spectacular site of Upper Brandon is enhanced by many old trees (mostly labeled) and extensive boxwood gardens. Extensive archaeological research and restoration was done 1986-91 by William Kelso with landscape architect William D. Rieley; an appropriate fenced garden (4) has been reconstructed including the brick forcing wall. The ongoing horticultural program is supervised by Beth Corker. The mysterious mound on the riverside lawn was once a rose garden. William Byrd Harrison was interested in Edmund Ruffin's theories of improved scientific land use, and Upper Brandon continues to operate a successful farming operation.

Other archaeology includes the Sunbury field site (5) west of Kennon Marsh. It was documented in 1985 by Nick

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Upper Brandon Plantation  
Prince George Co., Va.

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Luccketti to the Archaic or Early Woodland periods (8,000 BC-1,000 BC) with pottery dating from the Middle and Late Woodlands Periods (500 BC-AD 1607). Remains of an early colonial settlement of about 1640 also exist. Preliminary informal excavations were done at the Lodge site before construction. Shards and evidence of these prehistoric and early colonial locations are displayed in the slave cabin museum.

The old smoke house (6) just west of the kitchen dependency is a large octagonal building with an unusual conical roof structure.

The original icehouse (7) built into the side of the hill is located east of the main house. It is near the roadway to the wharf.

The slave cemetery (8) has not been explored and is identified by a local farmer, Cecil Ruben May.

Eleven noncontributing resources include: the dairy barn (A) built in the early 1900s; the farm barn (B) and nearby grain bins also built in the early 1900s; the manager's house (C) built in the colonial style in 1985; the larger farmhouse (D) and small farmhouse (E) both built in 1986; the corporate lodge (F) designed by Gordon Galusha and built in two sections in 1986 and 1990; a wharf site (G) and road bed

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Prince George Co., Va.

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from the original boat landing on the James River; a large octagonal gazebo (H) designed by William D. Rieley in 1988 incorporating the Benjamin railing design originally on the Upper Brandon roof; entrance gates (J) of brick and wood located part way down the driveway designed by Rieley in 1989; a small octagonal wellhouse (J) built over the original well in 1985 in imitation of the nearby octagonal smokehouse; 2138.5 acres (K unmarked) from the original 1616 grant of 5,000 acres (comprising agricultural land, conservation areas, and archaeological sites).

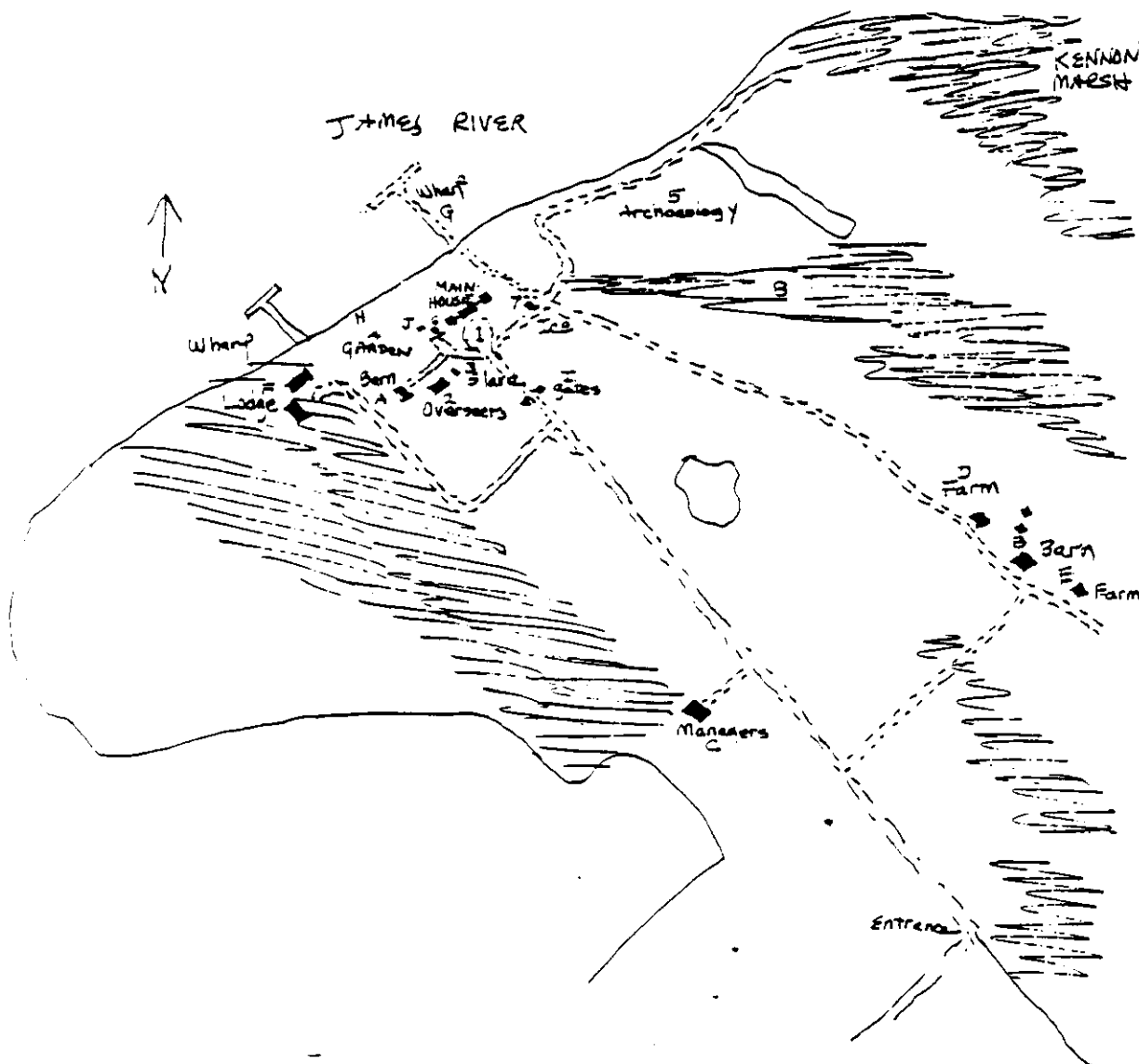
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Upper Brandon Plantation  
Prince George Co., Va.

Site Plan



CONTRIBUTING RESOURCES

1. Main house
2. Overseer's house
3. Slave House
4. Garden
5. Sunbury field
6. Smokehouse
7. Icehouse
8. Slave cemetery

NONCONTRIBUTING RESOURCES

- A. Dairy barn
- B. Farm barn
- C. Manager's house
- D. Farm house (large)
- E. Farm house (small)
- F. Lodge
- G. Warf
- H. Gazebo
- I. Gates
- J. Wellhouse
- K. Agricultural and Conservation area  
(whole property unmarked)

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National Park Service

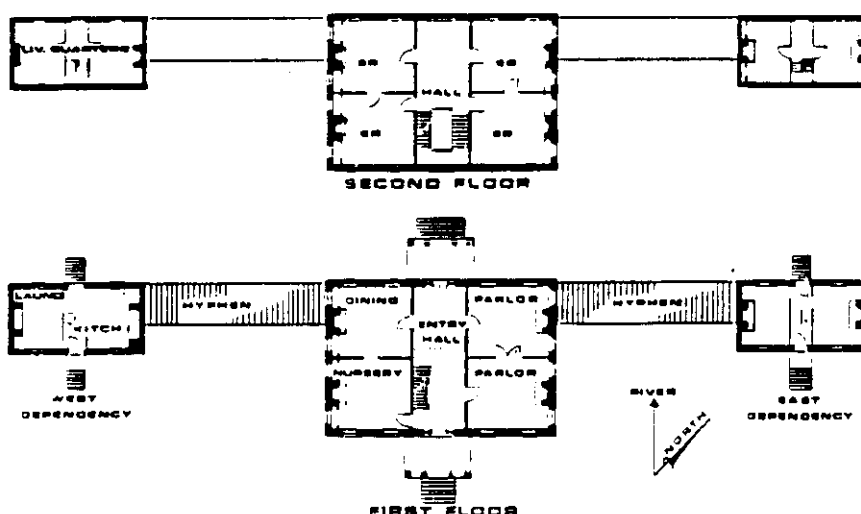
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Upper Brandon Plantation  
Prince George Co., Va.

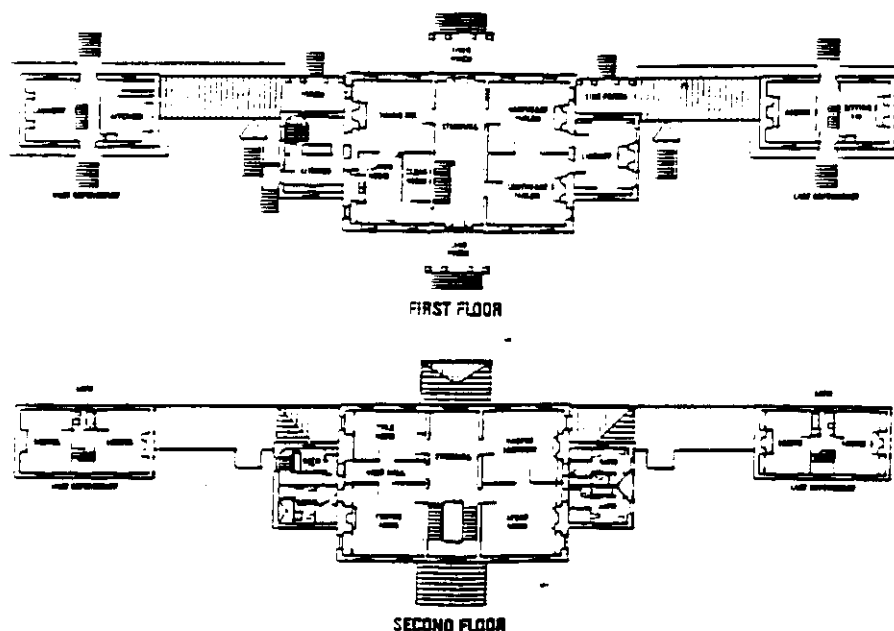
Floor plans: 1825, 1859. 1988

Upper Brandon Plantation, as built 1825



(Hilldrup, p.20)

Upper Brandon Plantation, 1859 additions  
1988 alterations



(JRC brochure)

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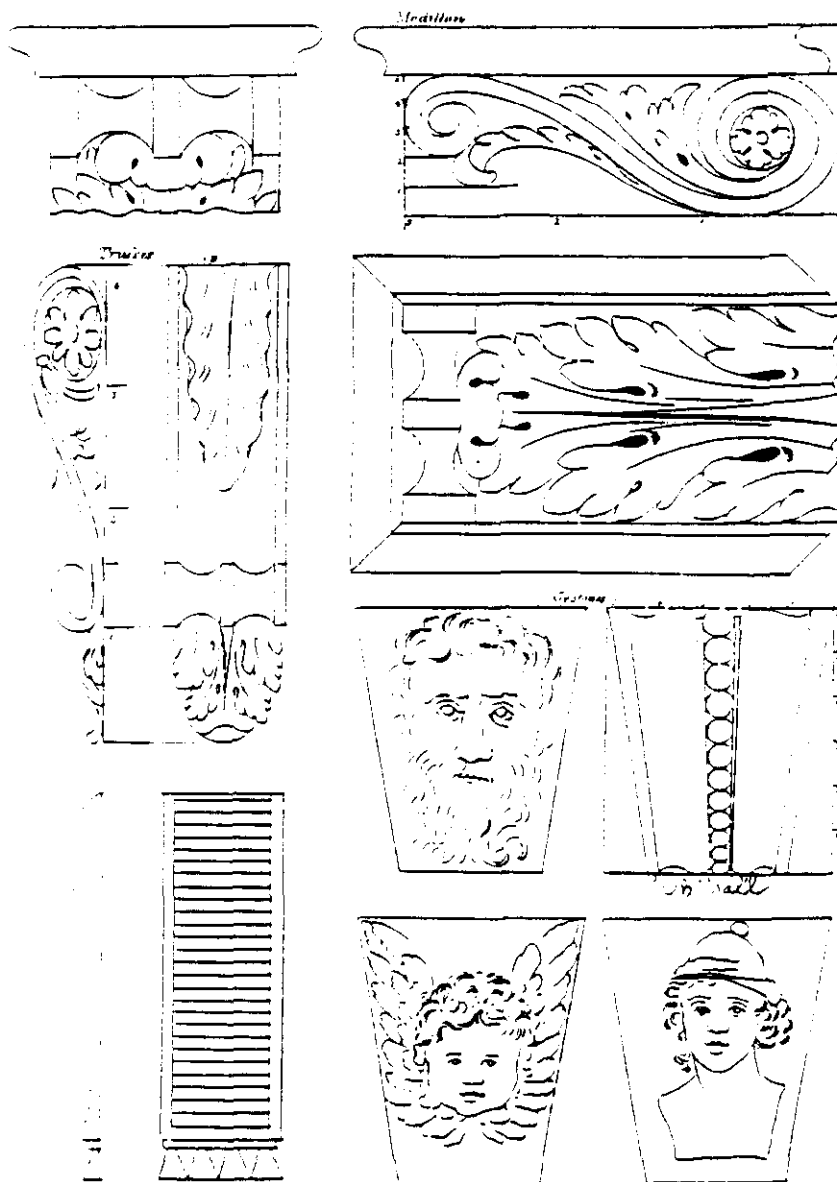
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Upper Brandon Plantation  
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Asher Benjamin, American Builder's Companion, plate 33

Plate 33



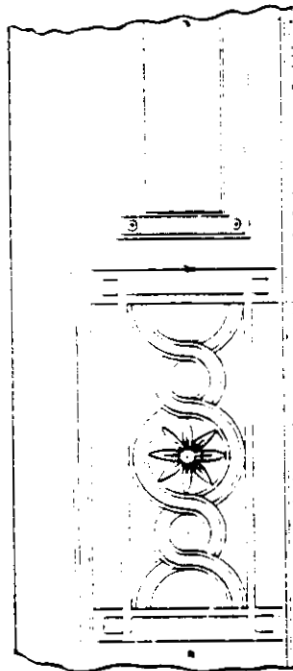
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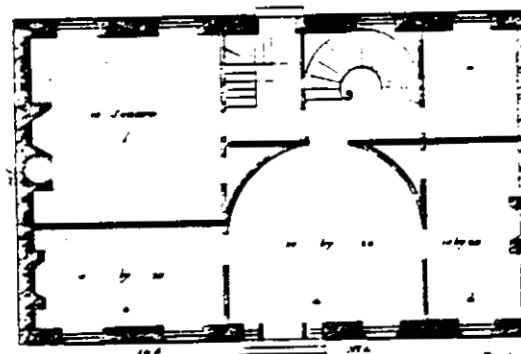
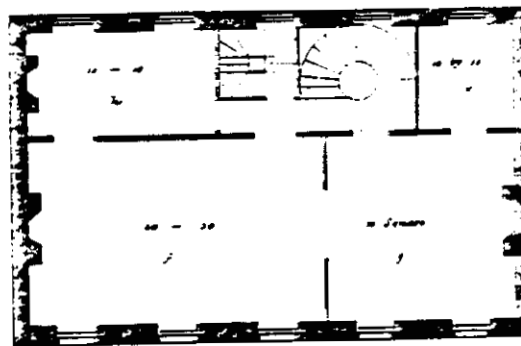
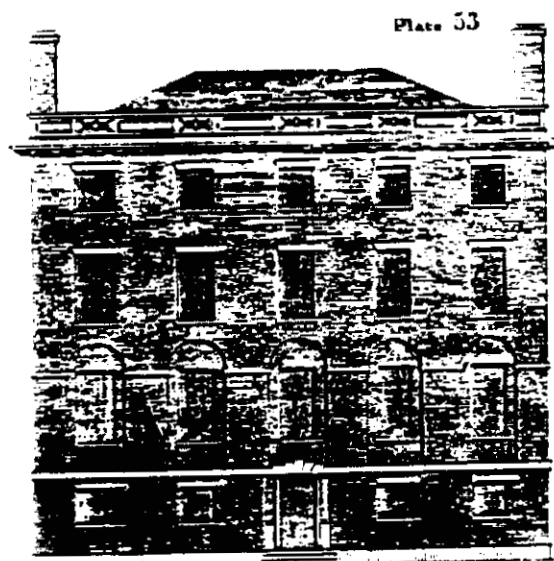
Upper Brandon Plantation  
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Asher Benjamin, American Builder's Companion, Plate 53



Scale of feet to one inch

A. Benjamin Del.





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Upper Brandon Plantation  
Prince George Co., Va.

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Significance

Upper Brandon Plantation is architecturally significant as one of the states largest and most significant Federal plantation houses and for its consistent land cultivation since the mid-seventeenth century. The buildings of the nineteenth century continue the plantation tradition on property historically documented since 1617 and owned by the Harrison family from the early eighteenth century. Upper Brandon was a portion of the 5,000 acres granted in 1616 by King James I to Captain John Martin, a founder of the Jamestown Colony. Martin died in 1632 and the property was maintained by absentee owners until the early eighteenth century. Benjamin Harrison II, of Wakefield, Surry County, acquired Brandon and added acreage that exceeded 7,000 acres by 1712. His grandson, Colonel Nathaniel Harrison I, built the original Brandon Plantation (VDHR 74-2) in 1765-70. Colonel Harrison's grandsons inherited the property at the death of their father, Benjamin Harrison III, in 1807. George Evelyn Harrison received Brandon and its manor house; William Byrd Harrison inherited 3,555 acres, which became Upper Brandon Plantation.

Many members of the Harrison family have been distinguished in national and local history. The builder, William Byrd

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Harrison, had enlightened views on agriculture and on slavery. His neighbor Edmund Ruffin was known for his advocacy of states' rights and his improved agricultural practices, published in his monthly Farmers' Register. Harrison contributed articles on his experiments to improve crops, such as the use of lime and the necessity of crop rotation. Commercial success was important, and the Upper Brandon wharf on the James River provided the transportation necessary to participate in a market economy of grain; this continued trade practices established in the seventeenth century with tobacco. The continuity of family ownership lasted until 1948.

The architecture of the main house and dependencies places Upper Brandon among a group of elegant and sophisticated Virginia houses built about 1830 by an accomplished group of workmen using the Asher Benjamin pattern book and possibly working under the direction of its co-author, Daniel Raynerd. These houses mostly mentioned specifically before include: Magnolia Grange (1822), Horn Quarter (1829-30), Hampstead (1825-27), the Governor's Mansion (1813;1830s), and Lower Brandon alterations (1830s). Following the 1859 additions, Upper Brandon had little modernization, leaving it mostly intact for the 1980s professional restoration.

Upper Brandon Plantation is located on a broad bend in the

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Upper Brandon Plantation  
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James River which provided into the twentieth century a scheduled landing for Tidewater shipping. Archaeological excavations show evidence of prehistoric occupation and of early colonial settlements. The area has long been known for its excellent game and sporting opportunities. Historic trees, boxwood and plantings in addition to the reconstructed garden retain the 19th century atmosphere. Roads, boundaries, and field patterns are generally original. 1,831 acres of land were donated in 1994 to the American Farmland Trust and Nature Conservancy. New houses and buildings on the property are compatible with the nineteenth century atmosphere.

Of the 5,000 acres patented in 1616, most remains today under cultivation. The 2,138.5 acres owned by the James River Corporation includes much of the original land as well as the Edloe plantation to the west. An important five-part clapboard house owned by John Edloe was insured in 1805 and 1810. When John T. Robertson remodelled the house on Willow Hill road (see plat of small acreage exempted from 1995 Robertson sale of Edloe to James River Corporation) the contractor noted old framing and beams hidden within the structure. These may be remnants of the original Edloe Plantation house

The current use as a corporate retreat has made the restored buildings, gardens, and wildlife preserve accessible to many

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groups, historical associations, and specialized tours as  
well as Garden Week visitors.

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1930

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In the Counties of Prince George, Chesterfield and  
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Harrison, Byrd and related family records, documents copied  
at Upper Brandon and in the Virginia Historical Society

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NATIONAL REGISTER OF HISTORIC PLACES  
CONTINUATION SHEET

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Upper Brandon Plantation  
Prince George County, Virginia

UTM COORDINATES

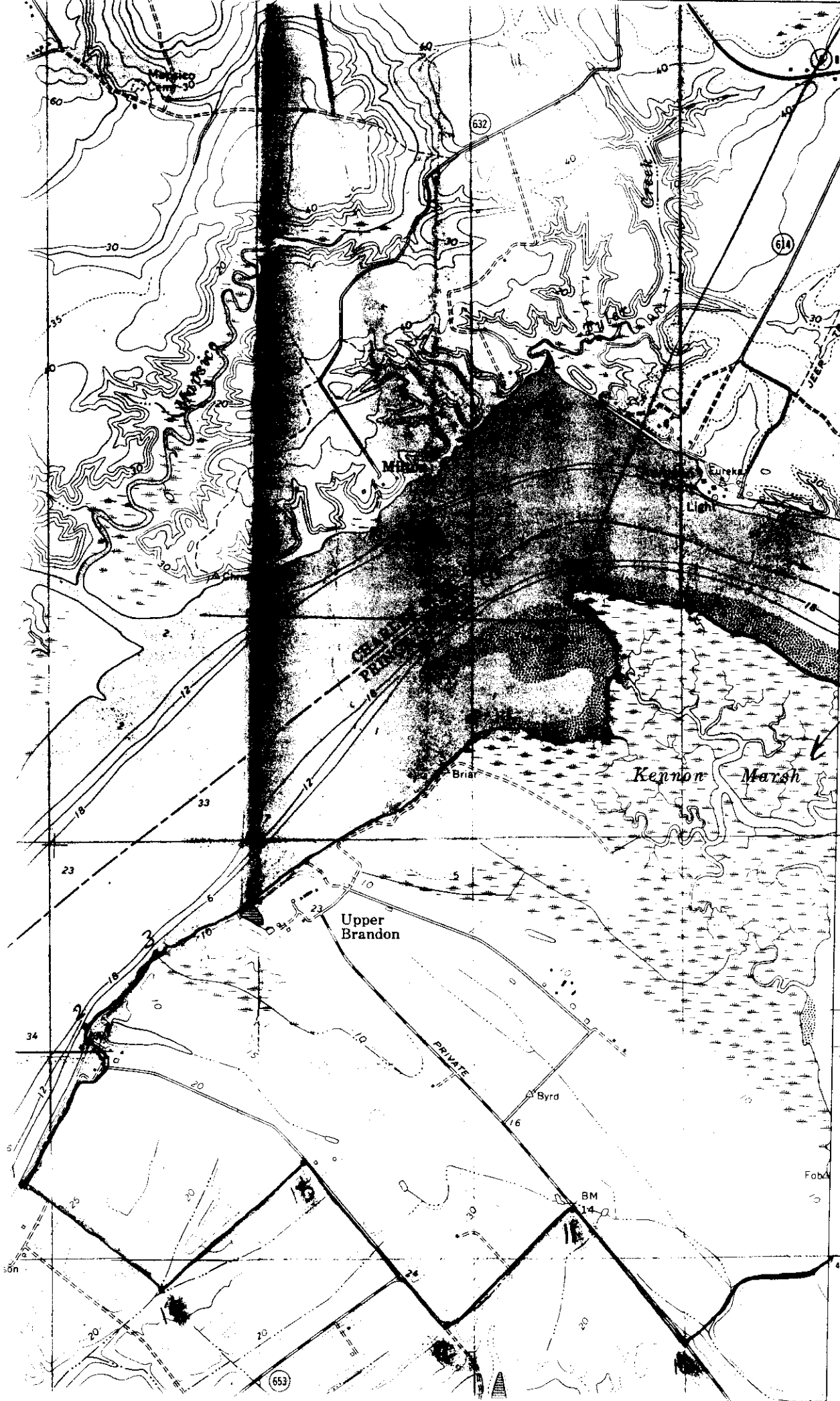
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11.	18	321480	4127240
12.	18	320880	4126700
13.	18	320220	4127460
14.	18	319520	4126880

VERBAL BOUNDARY DESCRIPTION

The nominated boundaries of Upper Brandon Plantation are shown on the accompanying USGS map and are defined by UTM coordinate points. They are also represented by tax parcel maps. The property contains 3 parcels totaling 2,138.5 acres. Tax parcel numbers 190(04)00-00-A-0, 190(04)00-00-B-0 (House site), 190(04)00-00-C-0, and the area commonly known as Kennon Marsh, all listed with the Prince George County Real Estate Assessor's Office.

VERBAL BOUNDARY JUSTIFICATION

The boundaries of the nominated property represents the remaining portion of the original 1660 land patent of 5000 acres. The property maintains its working farm status and contains historic resources pertaining to agriculture and its development. The main house and its auxiliary buildings are a good example of the plantation seat system common at this period in Virginia. The Harrison family owned this property from the early 18th century to 1948, giving it a lengthy period of continuous occupation.



Zone 10

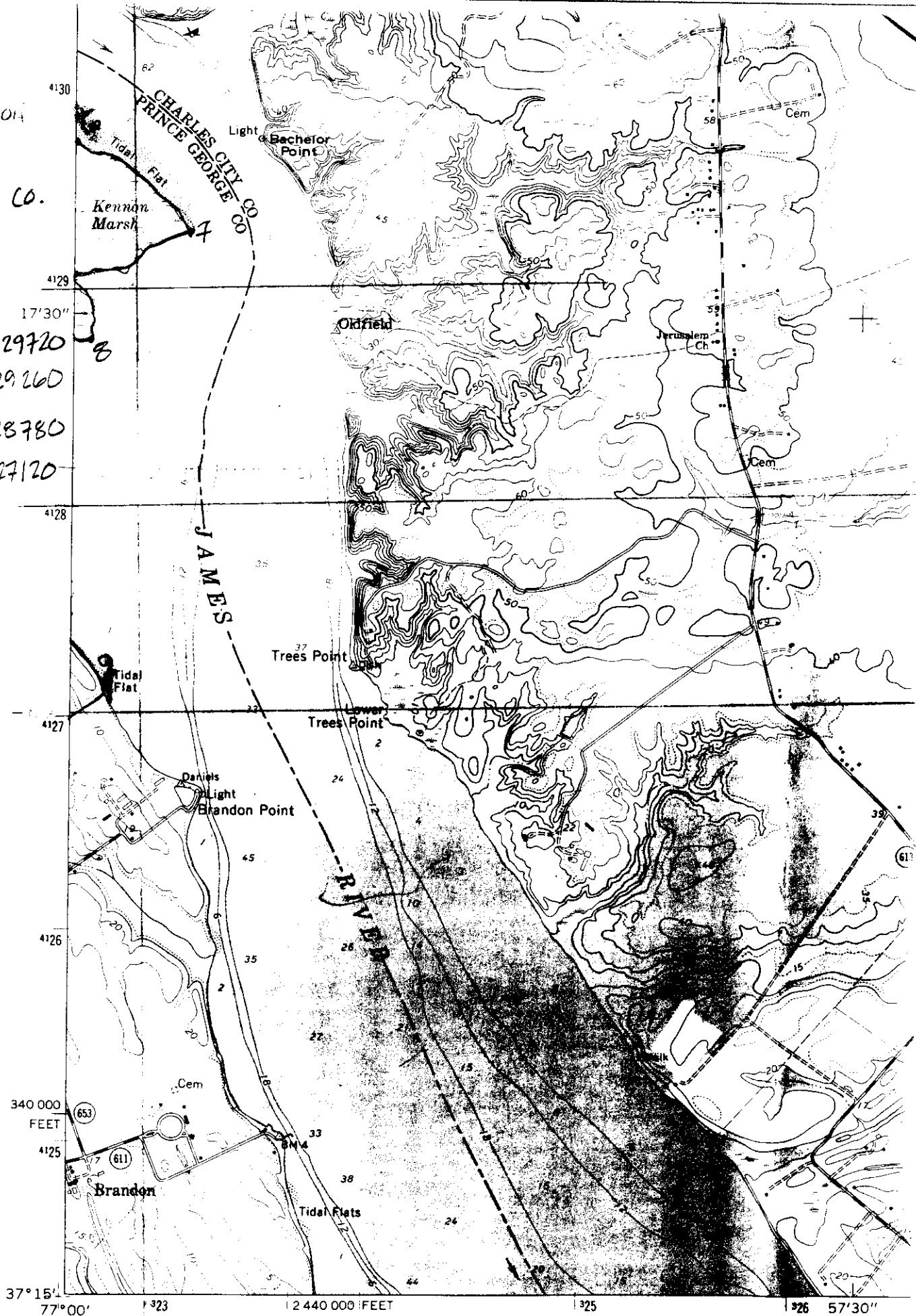
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⑦	323260	41292
⑧	322780	41287
⑨	322860	41271
⑩	322000	41266
⑪	321480	412724
⑫	320880	41267c
⑬	320220	41274c
⑭	319500	41268c

UPPER BRANDON  
PLANTATION  
PRINCE GEORGE CO.  
VIRGINIA

4132  
4130  
4129  
17'30"  
4128  
4127

UPPER BRANDON  
PLANTATION  
PRINCE GEORGE CO.  
VIRGINIA  
ZONE 18

E N 17'30"  
6 322760/4129720  
7 323260/4129260  
8 322780/4128780  
9 322860/4127120



(SAVED)  
5556 11 NE

Mapped, edited, and published by the Geological Survey  
Control by USGS and NOS/NOAA  
Topography by photogrammetric methods from aerial  
photographs taken 1963. Field checked 1965





UNITED STATES DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICENATIONAL REGISTER OF HISTORIC PLACES  
EVALUATION/RETURN SHEET

REQUESTED ACTION: NOMINATION

PROPERTY Upper Brandon Plantation  
NAME:MULTIPLE  
NAME:

STATE &amp; COUNTY: VIRGINIA, Prince George

DATE RECEIVED: 7/24/97

DATE OF PENDING LIST: 8/05/97

DATE OF 16TH DAY: 8/21/97

DATE OF 45TH DAY: 9/07/97

DATE OF WEEKLY LIST:

REFERENCE NUMBER: 97000959

NOMINATOR: STATE

REASONS FOR REVIEW:

APPEAL: N	DATA PROBLEM: N	LANDSCAPE: N	LESS THAN 50 YEARS: N
OTHER: N	PDIL: N	PERIOD: N	PROGRAM UNAPPROVED: N
REQUEST: Y	SAMPLE: N	SLR DRAFT: N	NATIONAL: N

COMMENT WAIVER: N

     ACCEPT      RETURN      REJECT      DATE

ABSTRACT/SUMMARY COMMENTS:

State requested substantive review to determine if there is sufficient justification to include large acreage based upon claimed agricultural significance. I agree with State staff that the nomination does not justify agricultural significance for this plantation - there is not sufficient information provided on the history of agriculture practiced at the plantation, nor is there an explanation of how the historic and archeological resources included in the nomination reflect the agricultural importance of the area. It is not clear why the Site Plan lists the agricultural area as non-contributing.

RECOM./CRITERIA ReturnREVIEWER Patrick AndrusDISCIPLINE HistorianTELEPHONE                     DATE 9/4/97

DOCUMENTATION see attached comments Y/N see attached SLR Y/N

Additional justification needs to be provided in order to include the over 2,000 acres of the plantation