## Initial Assessment of Agricultural Operations' Stage 1 Reductions Falls Reservoir Water Supply Nutrient Strategy: Agriculture (15 A NCAC 02B.0280) For the Baseline Period (2006) through Crop Year 2011 A Report to the Water Quality Committee of the Environmental Management Commission From the Falls Lake Watershed Oversight Committee

#### SUMMARY

This report provides an initial assessment of collective progress made by the agricultural community to reduce nutrient losses toward compliance with Stage 1 of the Falls Lake Agriculture rule. For this report, the Falls Lake Watershed Oversight Committee (WOC) oversaw the application of accounting methods approved by the Water Quality Committee in March 2012 to estimate changes in nitrogen loss and phosphorus loss trend in the Falls Lake Watershed for the period between the strategy baseline (2006) and the most recent crop year (CY) for which data was available, 2011. The Falls Lake Watershed Oversight Committee (WOC) received and approved crop year CY2011 annual reports from six counties as part of the Falls Lake

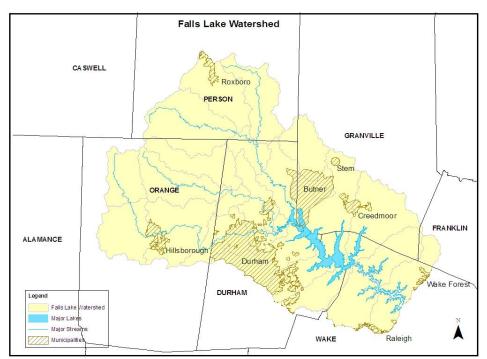
Agriculture rule, which is part of the Falls Reservoir Water Supply Nutrient Strategy. To produce this report, Division of Soil and Water Conservation staff received, processed and compiled baseline and current-year reports from agricultural staff in six counties, and the WOC compiled the information and prepared this report. Agriculture has been successfully decreasing nutrient losses in the Falls Lake watershed. In CY2011, agriculture collectively exceeded its 20% Stage I nitrogen reduction goal, with a 31% reduction compared to the 2006 baseline. Reductions in nitrogen have been achieved through an overall decrease in cropland in production, a decrease in nitrogen application rates, and an increase in best management practices (BMPs) such as 20- and 50-foot riparian buffers. Of the 9,525 acres of cropland decrease in the watershed, 27% (2,529 acres) was lost to development. Phosphorus qualitative indicators demonstrate that there is no

# Falls Lake Watershed Oversight Committee Composition, Falls Agriculture Rule:

- 1. NC Division of Soil & Water Conservation
- 2. USDA-NRCS
- 3. NCDA&CS
- 4. NC Cooperative Extension Service
- 5. NC Division of Water Quality
- 6. Watershed Environmental Interest
- 7. Watershed Environmental Interest
- 8. Environmental Interest
- 9. General Farming Interest
- 10. Pasture-based Livestock Interest
- 11. Equine Livestock Interest
- 12. Cropland Farming Interest
- 13. Scientific Community

increased risk of phosphorus loss, with a 9% and 15% decrease in animal waste phosphorus production and tobacco acreage, respectively, and an increase in cropland conversion to grass and trees since the 2006 baseline.





#### BACKGROUND

#### **Rule requirements and compliance**

In January 2011, the permanent Agriculture Rule that is part of the Falls Reservoir Water Supply Nutrient Strategy became effective. The Agriculture Rule provides for a collective strategy for farmers to meet nitrogen loss reduction goals in two stages. The goals for this nutrient strategy are compared to the 2006 baseline period. Stage 1 requires that agriculture reach a goal of 20% nitrogen loss reduction and 40% phosphorus reduction by year 2020. Stage II sets reduction goals of 40% and 77% for nitrogen and phosphorus, respectively, by year 2035. A Watershed Oversight Committee (WOC) was established to implement the rule and to assist farmers with complying with the rule.

All county Local Advisory Committees (LAC) submitted

#### Falls Lake NSW Strategy:

The Environmental Management Commission (EMC) adopted the Falls Reservoir Water Supply Nutrient Strategy rules in 2011. The strategy goal is to reduce the average annual load of nitrogen and phosphorus to Falls Lake from 2006 baseline levels. In addition to point source rules, mandatory controls were applied to addressing non-point source pollution in agriculture, urban stormwater, and riparian buffer protection. The management strategy was built upon the Neuse River, Tar-Pamlico River, and Jordan Lake Strategies.

their first annual reports to the WOC in October 2012. Collectively, agriculture in the six counties is meeting the nitrogen loss reduction goal, with a 31% reduction. Phosphorus qualitative indicators for phosphorus suggest there is no increased risk of phosphorus loss from agriculture in the watershed.

#### Scope of Report and Methodology

The estimates provided in this report represent whole-county scale calculations of nitrogen loss from cropland agriculture in the watershed made by soil and water conservation district technicians using the 'aggregate' version of the Nitrogen Loss Estimation Worksheet, or NLEW. The NLEW is an accounting tool developed to meet the specifications of the Neuse Rule and approved by the Environmental Management Commission's (EMC) Water Quality Committee in March 2012 for use in the Falls Lake Watershed. The development team included interagency technical representatives of the NC Division of Water Quality (DWQ), NC Division of Soil and Water Conservation (DSWC), United States Department of Agriculture (USDA)-Natural Resources Conservation Service (NRCS) and was led by NC State University (NCSU) Soil Science Department faculty. The NLEW captures application of both inorganic and animal waste sources of fertilizer to cropland. It does not capture the effects of nitrogen applied to pastureland, and is an "edge-of-management unit" accounting tool; it estimates changes in nitrogen loss from croplands, but does not estimate changes in nitrogen loading to surface waters. Assessment methods were developed and approved by the Water Quality Committee of the EMC for pastureland and phosphorus, and are described later in the report.

#### **Farmer Registration**

The Falls Lake Agriculture Rule tasks the local advisory committees in the watershed with conducting a registration process for persons subject to the Rule. The registration process was intended to serve as one mechanism to request information regarding the type and acreage of agricultural operations. It was also an opportunity to provide farmers with information on requirements and options under the rule, and details about available technical assistance and cost share options. The registration process was to be completed by January 15, 2012.

The Division of Soil and Water Conservation developed a registration website that provided information and allowed farmers to register electronically. This website was also included in an information pamphlet developed and distributed at agriculture meetings throughout the Falls Watershed. In addition to the development and distribution of these materials, individual LAC members conducted extensive farmer outreach and attended multiple agriculture meetings throughout 2011 and 2012 to present rule information and encourage farmer registration. Efforts included distributing registration information through Soil and Water Conservation District newsletters, numerous presentations at workshops and clinics, and to individuals at local farmers' markets.

Despite significant efforts made by the local advisory committees the response to the farmer registration was light, with a total of 55 farmers registering. The lack of response to the registration efforts is attributed to several factors. In general, feedback from farmers in the watershed indicated they felt that they did not need to register a second time because they had already registered under the Neuse Agriculture rules that have been in effect since 2001. The registration requirement of the rule has been very confusing. Some farmers stated that they felt that the registration unfairly targeted farmers because they had previously registered. Self-described "hobby farmers" didn't identify themselves as "agriculture" because of their smaller operations and did not feel registration was necessary for them. The lack of response to the registration process has not hindered implementation of the rules and the overall goal of the process. The type and acreage of agricultural operations has been obtained from other sources. The other goal of registration, which was to assure that farmers were supplied with information about the requirements and options under the rules, has been accomplished.

#### NITROGEN LOSS ACCOUNTING

#### Nitrogen Reduction from Cropland from 2006 Baseline for CY2011

All counties submitted their first progress reports to the WOC in October 2012. In CY2011 agriculture achieved a 31% reduction in nitrogen loss compared to the average 2006 baseline. All of the counties individually surpassed the Stage 1 20% reduction goal for nitrogen in the Falls Lake watershed, with the exception of Wake (9%). Table 1 lists each county's baseline and CY2011 nitrogen (lbs/yr) loss values from cropland, along with nitrogen loss percent reductions from the baseline in CY2011.

## Table 1. Estimated reductions in agricultural nitrogen loss (cropland) from baseline (2006) for CY2011,Falls Lake Watershed

	Baseline N Loss (lb)*	CY2011 N Loss (lb)*	N Loss Reduction (%)
County	NLEW	NLEW	NLEW
Durham	135,902	98,354	28%
Franklin	11,717	6,953	41%
Granville	127,704	81,252	36%
Orange	347,402	258,165	26%
Person	484,123	303,985	37%
Wake**	49,932	45,232	9%
Total	1,156,780	793,941	31%

\*Nitrogen loss values are for comparative purposes. They represent nitrogen that was applied to cropland in the watershed and neither used by crops nor intercepted by BMPs in an agricultural management unit, based on NLEW calculations. This is not an in-stream loading value.

\*\* Land in Wake County only represents 5 percent of the Falls Lake Watershed, and 8.5 percent of the total of all land in Wake County is in Falls Lake Watershed.

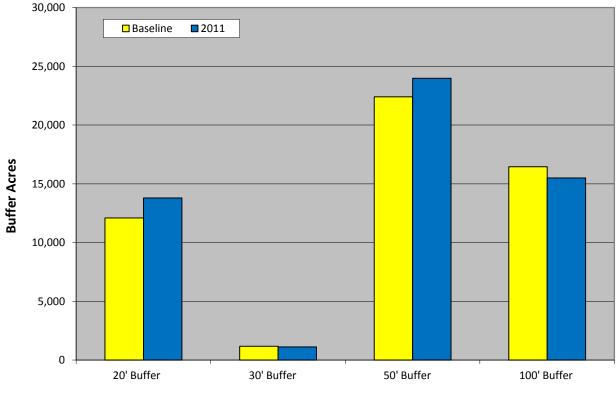
## **Best Management Practice Implementation**

Agriculture is credited with different nitrogen reduction efficiencies, expressed as percentages, for riparian buffer widths ranging from 20 feet to 100 feet. The NLEW version 5.53b for Neuse River Basin provides the following percent nitrogen reduction efficiencies for buffer widths on cropland: 20' receives 20% reduction, 30' receives 25% reduction, 50' receives 30%, and 100' receives 35% reduction. Note that these percentages represent the net or relative percent improvement in N removal resulting from riparian buffer implementation.

Figure 2 illustrates the amount of buffers on cropland in the baseline (2006) and CY2011. Overall, total acres of buffers have slightly increased since the baseline (4.3%). Acres of buffers of 20 and 50 foot widths have increased, 100 foot buffers have decreased, and 30 foot buffers have remained unchanged. The reported buffer acres do not take into account the entire drainage area treated by buffers in the piedmont which is generally 5 to 10 times greater than the actual acres of the buffers shown in Figure 2. (Bruton 2004)<sup>1</sup> Riparian buffers have many important functions beyond being effective in reducing nitrogen. Recent research has shown that upwards of 75% of sediment from agricultural sources is from stream banks and

<sup>&</sup>lt;sup>1</sup> Bruton, Jeffrey Griffin. 2004. Headwater Catchments: Estimating Surface Drainage Extent Across North Carolina and Correlations Between Landuse, Near Stream, and Water Quality Indicators in the Piedmont Physiographic Region. Ph.D. Dissertation. Department of Forestry and Environmental Resources, North Carolina State University, Raleigh, NC 27606.

that riparian buffers, particularly trees, are important for reducing this sediment. In addition, riparian buffers can reduce phosphorus and sediment as it moves through the buffer and provide other critically important functions.



# Figure 2. Nitrogen Reducing Buffers installed on Croplands from Baseline (2006) through CY2011, Falls Lake Watershed\*

**Buffer Width** 

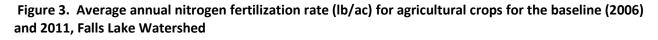
\* The acres displayed represent buffer acres. Acres treated by the buffer could be 5 to 10 times larger in the piedmont than the actual buffer acreage shown above. (Bruton 2004)<sup>1</sup>

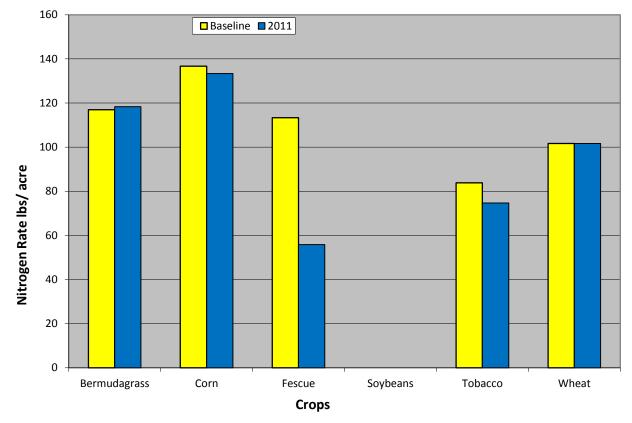
## **Fertilization Management**

Increased fertilizer cost has impacted the application rates of nitrogen on farms in the Falls Lake Watershed. For most crops, farmers have reduced their nitrogen application rates from baseline levels. Figure 3 displays the nitrogen application rates in pounds per acre for the major crops in the watershed. Nitrogen application rates for fescue hay decreased by over 50 pounds/acre, due to increasing fertilizer costs and decreasing profits from beef cattle. Rates on corn and tobacco decreased slightly. Nitrogen application rates for soybeans remained at zero. Bermudagrass and wheat nitrogen application rates remained relatively constant in CY2011 compared to the 2006 baseline. Fertilizer rates will be revisited annually by county local advisory committees using data from farmers, commercial applicators and state and federal agencies' professional estimates.

## Factors Identified by LACs Contributing to Reduced Nitrogen Application Rates since the Baseline Year:

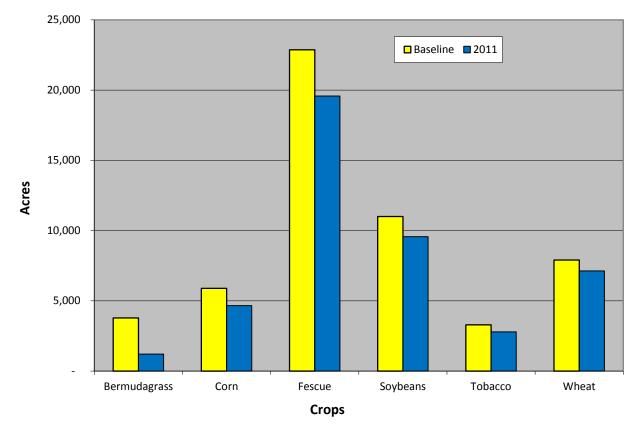
- Rising fertilizer costs and fluctuating farm incomes.
- Mandatory waste management plans.
- The federal government tobacco quota buy-out reducing tobacco acreage.
- Neuse Nitrogen Strategies.





## **Cropping Shifts**

The LACs recalculate the cropland acreage annually by utilizing crop data reported by farmers to the Farm Service Agency. Because each crop type requires different amounts of nitrogen and uses applied nitrogen with a different efficiency rate, changes in the mix of crops grown can have a significant impact on the cumulative yearly nitrogen loss reduction. The WOC anticipates that the watershed will see additional crop shifts in upcoming years based on economic changes. A host of factors from individual to global determine crop choices. Crop acreages are expected to fluctuate yearly with market changes. Figure 4 shows crop acres and shifts for CY2011 compared to the baseline. The acres of all major crops have decreased by over 9,500 acres in the watershed since the baseline.



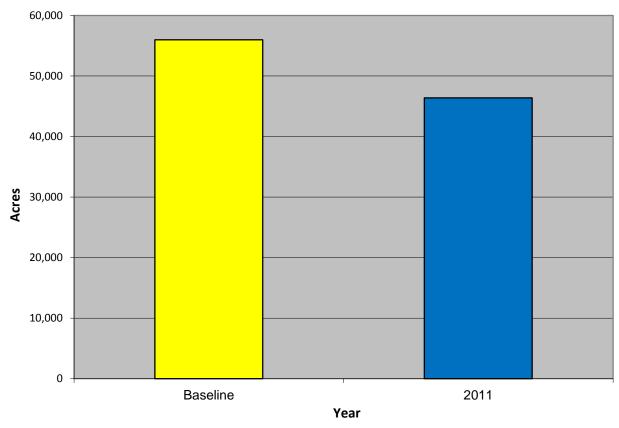


## Land Use Change to Development and Cropland Conversion

The number of cropland acres fluctuates every year in the Falls Lake Watershed due to cropland conversion and development. Each year, some cropland is either permanently lost to development or converted to grass or trees and likely to be ultimately lost from agricultural production. Data regarding land use change since the baseline is summarized below.

It is estimated that since the 2006 baseline there has been a decrease in crop production of 9,525 acres (17% of total cropland). Of that, 2,529 cropland acres (27% of cropland loss) have been permanently lost to development. Of the 295 cropland acres converted to grass or trees through state and federal cost share programs, almost all (97%) was converted to grass.

The estimates for cropland lost to development come from methodologies developed at the individual county level based on available information and the many and diverse local government reporting requirements associated with development. Each county uses a different method, but these methods are documented and use the best local information available. The remaining acreage (6,701 acres) could potentially be brought back into crop production. These estimates do not separate the amount of cropland versus pastureland lost; the number reported is agricultural land converted to development.





## PHOSPHORUS LOSS ACCOUNTING

## **Phosphorus Indicators for CY2011**

The qualitative indicators included in Table 2 show the relative changes in land use and management parameters and their relative effect on phosphorus loss risk in the watershed. This approach was recommended by the Phosphorus Technical Advisory Committee (PTAC) in 2005 due to the difficulty of developing an aggregate phosphorus tool parallel to the nitrogen NLEW tool and the PTAC reconvened to make minor revisions for the tool's use in the Jordan Lake Watershed in April 2010. This modified approach was approved for use in the Falls Lake Watershed by the Water Quality Committee of the EMC. This report includes phosphorus indicator data for the baseline period (2006) and CY2011. Most of the parameters indicate less risk of phosphorus loss from agricultural management units than in the baseline period.

Factors contributing to the reduced risk of phosphorus loss in the Falls Lake Watershed include:

- Tobacco acres were reduced by over 15%
- Animal waste was reduced by 9% from swine, poultry and cattle
- Cropland conversion to other uses.

The soil test phosphorus median number reported for the basin fluctuates each year due to the nature of how the data is collected and compiled. The soil test phosphorus median numbers shown in Table 2 are from agricultural operations and are generated by using North Carolina Department of Agriculture and Consumer Services (NCDA&CS) soil test laboratory results from voluntary soil testing and the data is reported by the NCDA&CS. The number of samples collected each year varies. The data does not include soil tests that were submitted to private laboratories. The soil test results from the NCDA&CS database represent data from entire counties in the basin, and have not been adjusted to include only those samples collected in the Falls Lake Watershed.

# Phosphorus Technical Assistance Committee (PTAC):

The PTAC's overall purpose was to establish a phosphorus accounting method for agriculture in the Tar-Pamlico River Basin. It determined that a defensible, aggregated, county-scale accounting method for estimating phosphorus losses from agricultural lands was not feasible due to "the complexity of phosphorus behavior and transport within a watershed, the lack of suitable data required to adequately quantify the various mechanisms of phosphorus loss and retention within watersheds of the basin, and the problem with not being able to capture agricultural conditions as they existed in 1991." (1991 was the Tar-Pamlico Basin's baseline year.) The PTAC instead developed recommendations for qualitatively tracking relative changes in practices in land use and management related to agricultural activity that either increase or decrease the risk of phosphorus loss from agricultural lands in the basin on an annual basis. This is the approved approach for the Falls Lake Watershed.

			Baseline		Percent	CY2011 P Loss Risk
Parameter	Units	Source	CY2006	CY2011	change	+/-
Cropland	acres	FSA	10,834	7,545	-30%	-
Cropland conversion (to grass & trees)	acres	USDA-NRCS & NCACSP	1,527	1,822	19%	-
CRP / WRP (cumulative)	acres	USDA-NRCS	0	0	0%	N/A
Conservation tillage*	acres	USDA-NRCS & NCACSP	26,787	18,142	-32%	+
Vegetated buffers (cumulative)	acres	USDA-NRCS & NCACSP	52,139	54,390	4%	-
Scavenger crop	acres	LAC	0	0	0%	N/A
Tobacco	acres	LAC	3,288	2,782	-15%	-
Animal waste P	lbs of P/ yr	NC Ag Statistics	586,612	536,009	-9%	-
Soil test P median	mg/kg	NCDA& CS	77	74	-4%	-

 Table 2. Relative Changes in Land Use and Management Parameters and their Relative Effect on

 Phosphorus Loss Risk in the Falls Lake Watershed

\* Conservation tillage is being practiced on additional acres but this number only reflects acres under active cost share contracts, not acres where contracts have expired or where farmers have adopted the use of conservation tillage without cost share assistance. It is likely that conservation tillage acres remain high, even after contracts expire, due to farmer satisfaction with the practice after initial implementation.

Given the key role of phosphorus in the Falls Lake nutrient strategy, the Falls WOC recommends that phosphorus accounting and reporting follow a three-pronged approach:

- 1. Annual Qualitative Accounting: Conduct annual qualitative assessment of likely trends in agricultural phosphorus loss in the Falls watershed relative to 2006 baseline conditions using the method established by the 2005 PTAC report that added tobacco acreages and removed water control structures.
- 2. A Phosphorus Loss Assessment Tool (PLAT) has been developed to assess potential P loss from cropland to water resources. A survey of the Falls Lake watershed counties was conducted in 2010, with the next survey to be conducted in 2015 if funding is available. The results of the 2010 survey demonstrated that the potential for phosphorus loss is very low (< 0.35 lbs/ac/yr) for four of the five counties surveyed. Phosphorus loss in Orange County is rated at the low end of the medium range (> 1 lb/ac/yr). Even with the installation of buffers along all streams and the discontinuation of phosphorus (fertilizer, biosolids, or animal waste), there would be limited potential for phosphorus loss reduction.
- 3. Improved understanding of agricultural phosphorus management through studies using in-stream monitoring: quantitative in-stream monitoring should be funded contingent upon the availability of funding and staff resources. An appropriate water quality monitoring design would be a paired-watershed study of subwatersheds with only agricultural land use. This design will allow estimates of phosphorus loading for different management regimes and load reductions after conservation practices have been implemented. However, funding for this study is currently unavailable.

The WOC recommends that no additional management actions be required of agricultural operations in the watershed at this time to comply with the phosphorus goals of the agriculture rule. The WOC will continue

to track and report the identified set of qualitative phosphorus indicators to the Division of Water Quality (DWQ) annually, and as directed by the rule to the Environmental Management Commission, with the next reports to the Commission due in January, 2014 and January, 2016 on Stage 1 progress. The WOC expects that BMP implementation may continue to increase throughout the watershed in future years, and notes that BMPs installed for nitrogen, pathogen and sediment control often provide significant phosphorus benefits as well.

#### PASTURE POINTS ACCOUNTING

The use of a pasture points system was approved by the EMC's Water Quality Committee for use in the Falls Lake Watershed to account for nutrient losses from pasture management units. Pasture activities are tracked by the federal Census of Agriculture conducted by USDA-National Agricultural Statistical Service every five years. The last year for which data was collected was 2007 and the next data set was collected in 2012 and will be available in 2014. Thus, no comparative data is available for pasture accounting in the Falls Lake watershed for this report. As part of the pasture points system, the data used for calculation purposes are acres of pastureland, number of pastured animal units, and livestock densities. The history and process to be used in the 2014 accounting is described below.

A pasture point system subcommittee was formed in 2010 to revisit the accounting method that was developed as mandated by a Session Law of the NC General Assembly for the Tar-Pamlico Basin Agriculture Rule. The subcommittee consisted of individuals representing NCSU, USDA-NRCS, NC DSWC, NC DWQ, NCDA&CS, and Alamance Soil and Water Conservation District. After reviewing available data sources and existing research findings the subcommittee made certain observations and recommendations, which the WOC has accepted.

The pasture point subcommittee found that:

- While the Tar-Pamlico point system was of sound design, it was not practically implementable because it required field-scale assessment, for which human resources were not available. For the purposes of this rule, given the same resources limitations, a county-scale approach to nitrogen loss accounting will be necessary as is done with cropland NLEW accounting.
- Unlike state-based cropland statistics that are developed annually, pasture activities are tracked only by the federal Census of Agriculture conducted by USDA-National Agricultural Statistical Service every five years. This will necessarily limit pasture accounting under this rule to a 5-year cycle. For Falls Lake accounting, the baseline will be 2007 compared to 2012.
- The point system developed for the Tar-Pamlico is fundamentally sound. It assigned nitrogen "point" credit values for BMPs in lieu of percent reductions based on recognition that research data are insufficient to provide the level of confidence required for attributing percent reductions in nitrogen. Point values reflect best estimates of percent nitrogen reduction but instead bear the "point" label to connote this greater uncertainty. Research has advanced since the Tar-Pamlico system was developed but not sufficiently to depart from this approach.

The crop year 2014 annual report will be the first time that the CY2012 pasture data will be available from the 2012 Census of Agriculture for a CY2007 and CY2012 comparison.

#### **BMP IMPLEMENTATION**

Not all types of nutrient and sediment-reducing BMPs are tracked by NLEW. Other BMPs include: livestockrelated nitrogen and phosphorus reducing BMPs, BMPs that reduce soil and phosphorus loss, and BMPs that do not have enough scientific research to support estimating a nitrogen benefit. The WOC believes it is worthwhile to recognize these practices. Table 3 identifies BMPs and tracks their implementation in the watershed since the end of the baseline period.

		<b>BMPs</b> Installed	
BMP	UNITS	(CY2011-CY2006)	
Critical Area Planting	Acre	2	
Composting Facility	Number	1	
<b>Cropland Conversion - Grass</b>	Acre	286	
<b>Cropland Conversion - Trees</b>	Acre	9	
Diversion	Feet	14,378	
Dry Stack	Number	5	
Fencing (USDA programs)	Feet	33,239	
Field Border	Acre	2007	
Grassed Waterway	Acre	8,501	
Livestock Exclusion	Feet	11,098	
Nutrient Management	Acre	398	
Pasture Renovation	Acre	326	
Stream Crossing	Number	1	
Sod-Based Rotation	Acre	6,705	
Tillage Management	Acre	18,277	
Terraces	feet	3,463	
Trough or Tank	number	15	
Waste Storage Facility	number	5	

#### Table 3: Nutrient and sediment-reducing installed best management practices, Falls Lake Watershed\*

\*Values represent active contracts in State and Federal cost share programs.

#### LOOKING FORWARD

The Falls Lake WOC will continue to improve rule implementation, relying heavily on the local soil and water conservation districts who work directly with farmers to assist with best management practice design and installation.

Because cropping shifts are susceptible to various pressures, the WOC is working with all counties to continue BMP implementation on both cropland and pastureland that provides for a lasting reduction in nitrogen and phosphorus loss in the watershed while monitoring cropping changes.

The committee overseeing the development of NLEW has been reviewing BMP efficiencies credited by the nutrient accounting software. This review is part of the ongoing examination of practices utilized to assess

cropland's nutrient losses. Any recommended changes from the NLEW committee will be incorporated into nutrient accounting in future crop years.

Phosphorus accounting and reporting will continue to address qualitative factors and evaluate trends in agricultural phosphorus loss annually. Periodic land use surveys with associated use of PLAT will be conducted every five years contingent upon availability of funding and staff resources. Additionally, understanding of agricultural phosphorus management could be improved through in-stream monitoring contingent upon the availability of funding and staff resources.

A subcommittee of the Falls and Jordan Lake WOCs is working with DWQ on issues regarding nutrient offsets that arise from trades involving agricultural land. Also, the WOC feels that additional research is needed on accounting procedures for pasture operations, and supports such research being conducted. Additionally, should readily accessible information become available on biosolids applications to cropland in the watershed, the WOC will consider whether separate accounting for those applications of nutrients is feasible and appropriate.

Funding is an integral part in the success of this strategy.

# WOC recognizes the dynamic nature of agricultural business:

- Urban encroachment (i.e., crop selection shifts as fields become smaller)
- Age of farmer (i.e. as retirement approaches farmers may move from row crops to cattle or hay production)
- Changes in the world economies, energy or trade policies
- Changes in government programs (i.e., commodity support or environmental regulations)
- Weather (i.e., long periods of drought or rain)
- Scientific advances in agronomics (i.e., production of new types of crops or improvements in crop sustainability)
- Plant disease or pest problems (i.e., viruses or foreign pests)

Without funding for the local Soil and Water Conservation District technicians, the collection of county data for the annual progress reports would fall on the LACs without assistance to compile data and county annual reports. In addition, technicians are needed for BMP installation. Farmers and agency personnel with other responsibilities serve on the LACs in a voluntary capacity. If funding for technician positions is not available, the LACs would have a difficult time meeting the workload requirements. The WOC considers this to be important work, and supports future funding to continue to meet the annual reporting requirements, and the continued efforts to increase BMP implementation.