

Donner Lake Open Water Swim Safety Plan

EVENT DESCRIPTION

General Information The Donner Lake swim is a point-to-point 2.7 mile swim planned for August 15th, 2020. Expected water temperature of 65-68 degrees. Maximum number of swimmers allowed is 450. The race will start at 8:30 am. The course starts at the east end of the lake, near the Donner Memorial State Park, and finishes at the West End Beach. Swimmers are instructed to swim in the middle of the lake and are guided by volunteer kayaks patrolling the north and south perimeters of the swim course. The swim has a **strictly enforced** 2 1/2 hour cut off time. The official cut off time is 11:00 am. The safety plan outlines the procedures for the swim, roles of the volunteer kayakers, and motorized boats/wave runners.

Swimmer Warm-up area A designated warm-up area will be provided for swimmers. The warm up area will be patrolled by 4 kayakers from 7:30 until 8:15. All swimmers wishing to warm-up prior to the race must do so in the designated warm-up area.

SAFETY

The event provides a 6-point plan for swimmer safety that includes:

1. **Motor boats.** Three to five motor boats will patrol the swim course to watch for volunteer kayakers waving orange flags and will remove swimmers from the course as needed. One motor boat will be positioned near the first 1/3 of swimmers, another motor boat will be located near the middle of the group of swimmers, and the third motor boat will be located near the rear of the swimmers.
2. **Police boat.** One police boat will monitor the perimeter of the course to assess for swimmers needing assistance and to assist with boat traffic along the swim course. The police boat carries an *“automated external defibrillator (AED) for cardiac emergencies.*

3. **Kayaks.** Approximately 30 volunteer kayaks will accompany swimmers along the swim course to guide swimmers to stay in the middle of the lake and to remain on course. Kayakers will have orange, man-in-the water, flags to signal motor craft for a pick-up as needed.
4. **Medics.** An ambulance service with two paramedics will be present and stationed at the east end beach. 20 minutes following the start of the race, the ambulance will drive to the West End Beach and remain at the finish near the pavilion until the race is completed.
5. **Wave-runners.** One to three wave-runners will patrol the swim.
6. **First aid station.** The first aid station will be at the finish and will be manned by 2 volunteers (MD, RN and/or medical student). The first aid station will have a tent, chairs, towels, blankets, hot liquids and basic first aid supplies. The staff will record the name and race number (if applicable) of each person seen and the outcome.

ACCOUNTING FOR SWIMMERS

This is done with coordination between the Race Director, Safety Coordinator, and timing company. Prior to the start of the race, the timing company will have a list of all the swimmers who checked in with a total number of swimmers that will be entering the water. During pre-race instructions participants will be directed to go to the timing tent at the finish if they fail to start or finish the race. The start will have the Safety Coordinator and one SNM board member on the beach observing for any swimmers who do not start the race or start and who come back to shore. This Safety Coordinator will record the non-starting swimmer's name and race number on a list. This list will be given to the timing company at the finish.

If a swimmer is pulled from the water during the race, the operator of the boat pulling the swimmer will call the Safety Coordinator via cell phone to report the swimmers name, race number and condition. The Safety Coordinator will in turn give this information to the timing company and ambulance if EMS care is needed. If the swimmer is experiencing a medical emergency boaters are instructed to call 911.

One race official will be located at the finish by the timing company tent to monitor for swimmers being dropped off or swimmers who approach the timing tent who either did not start or finish the race.

MEDICAL EVACUATION PLAN

Start

If an evacuation occurs at the start or within 20 minutes of the start, the swimmer will be brought to the start near the Tahoe-Donner Beach Club. If the swimmer is in the water, a kayaker will approach the swimmer. The kayaker will wave their orange, man-in-the-water, flag to get the attention of a motor boat. The swimmer will be assisted outside the race course by the kayaker and delivered to the motor boat which will have turned off its engine. The motor boat operator will call the Safety Coordinator and provide swimmers name, race number, and condition. The motor boat will then take the swimmer to the start. If the swimmer is experiencing a medical emergency boaters are instructed to call 911. If it is a non-emergency, the swimmer will be instructed to take the shuttle to the finish.

The Safety Coordinator and one SNM board member will remain at the east end beach until 20 minutes after the start of the race. The ambulance service will remain parked at the start during the same time period to assist and care for any incidents. Twenty minutes after the start the ambulance service, the Safety Coordinator, and the SNM board member will drive to the finish.

During the race

If an evacuation occurs 20 minutes after the start, the race participant will be brought to the finish. Kayaks will monitor swimmers within the race course. Swimmers are instructed to wave their hand above their head to get the attention of a kayak. The kayak will approach the swimmer. If the swimmer needs to be removed from the water, the kayak will assist the swimmer outside the race course if the area is congested with other swimmers. The kayaker will wave the orange, man-in-the-water, flag to get the attention of a motor boat or wave-runner. The motor boat or wave-runner will approach the kayak and swimmer, turn off the engine and remove the swimmer from the water. The motor boat or wave-runner will call the Safety Coordinator and provide the swimmer's name, race number, and condition. The swimmer will be brought to the finish and will be evaluated by the ambulance if needed.

Directions to Hospital: Written directions to Tahoe Forest Hospital will be available at the start and finish if participants need to transport themselves to the hospital.

EVENT CANCELLATION PLAN (During the Event)

The Safety Coordinator and/or race committee members may cancel the event at any time. Possible causes of cancellation include thunder, lightning, and/or turbulent water due to wind. In the event that the race is cancelled after the start, motor boats and wave-runners will be notified by a race committee member via cell phone. The motor boats and wave-runners will then pass the cancellation notice on to the kayakers. The motor boats (staying out of the race course) and kayakers will work together to evacuate swimmers to the shore on the north side of the lake. The shuttle bus will leave the finish and drive east on Donner Pass Road and pick up evacuated swimmers and bring them to the finish. Two volunteers will wait at the finish for the shuttle and write down race numbers as participants exit the shuttle. If swimmers are closer to the finish than to exiting the north side of the lake they will exit via the finish and be accounted for by the timing company.

MOTORIZED BOAT SAFETY

Three to five volunteer motorized boats and one to three wave-runners with experienced operators will assist during the swim. These volunteers are not required to have first aid training but should be comfortable operating their motorized watercraft in potentially crowded conditions. The motorized watercraft need to be in sound operating condition. The boats should be capable of transporting at least four people, and able to be comfortably boarded from the water without risking tipping or injury to the swimmer.

General Operating Requirements:

- Must have vessel registration and provide proof of insurance 1 week prior to the swim. Proof of insurance to be submitted to the Race Director.
- Crew is limited to one operator and two volunteers
- A propeller guard or swimmer spotter is required per USMS rules

Boats must be equipped with the following:

- Orange, man-in-the-water or similar flag
- Four life jackets

- Charged cell phone
- Anchor
- Bucket or bilge pump
- Secondary motor or paddle
- Adequate fuel to ensure, at a minimum, operation during the entirety of the race
- Blankets or towels for swimmers picked up during the race
- Binoculars

Optional but strongly recommended equipment includes:

- First aid kit
- Fire extinguisher
- 50-foot throw rope

WATERCRAFT ROLES

Motorized boats, wave-runners and the police boat will accompany swimmers along the race course. Volunteer kayaks will provide additional swim support. Motorized boats provide general functions during the event. Those functions include:

1. **Course patrol and communications.** Motor boats and wave runners will operate at the periphery of the race course to monitor swimmers and to alert non-participating boaters in the area of the event. Motorized boats will use cell phones to provide communication to the Safety Coordinator. **Communication with the Safety Coordinator and monitoring swimmers is the boaters' primary role.**

2. **Swimmer rescue.** Any swimmer rescued by a kayaker will be removed from the event. These swimmers will be transported and to the West End Beach by a motor boat. The boaters' **other main roles include** monitoring for swimmers needing assistance by observing the course for kayakers with raised orange, man-in-water, flags and transporting rescued swimmers to the race finish.

3. **Swimmer patrol.** Motor boats are also responsible for pulling slow or unfit swimmers as determined by a race committee member on the Police Boat.

DAY-OF-RACE SCHEDULE

Boat and waver-runner operators should launch boats at 8:00 am and be ready to operate by 8:30 am at the east end of Donner Lake. Boats must have a current “watercraft inspection program” (WIP) sticker and pass an inspection at the Donner Lake boat launch. Boaters should arrive early since inspections start at 7 am.

Meeting

A motorized boater meeting will be completed **the week prior to** the Donner Lake Swim. A copy of the safety plan will be provided. During this meeting the following procedures will be reviewed:

- Communication
- Swimmer rescue
- Course patrol and assignment of boat position on the race course
- Contact information for the Safety Coordinator, Race Director and police boat

Start Information

Prior to the start, boats will be positioned approximately 300 yards from the beach and at the periphery of the race course.

The event is expected to have up to 450 swimmers. The race will start at 8:30 am. Approximately 30 volunteer kayakers will be in the water and positioned about 200 yards from the start. The kayakers are assigned positions to guide the swimmers with half of the kayakers located to the right of swimmers (north side) and the remaining half to the left of swimmers (south side). The volunteer kayakers are also divided into groups patrolling the leading third of the swimmers, the middle third of swimmers, and the rest of the swimmers. One kayak will be placed at the back of the swimmers. Volunteer kayakers for the group swim will provide support for all swimmers and will be wearing orange vests.

The motor boats will be assigned positions similar to the volunteer kayakers with one boat near the leading group of swimmers on the right (north) side, one near the middle group of swimmers on the left (south) side, and one boat at the back

of the swimmers on the left (south) side.

All boats need to be careful of swimmers and be positioned at the periphery of the swim course located in the middle of the lake. Pilots of motor boats should expect to operate at dead-slow speed, idling in and out of gear at approximately 2 mph.

As the first and second boats near the finish with their designated group of swimmers, they should then circle back to provide support for the remaining swimmers.

The event shall be concluded 2 1/2 hours after the start. The cutoff time shall be strictly enforced. No swimmers will be allowed to swim after the cutoff time due to safety concerns. Any swimmer remaining in the water must be pulled by boats. Volunteer kayaks are not allowed to provide support for any swimmer requesting to complete the swim after the cutoff time. Swimmers in the water after the 11:00 am cutoff time do not have adequate safety and must be pulled from the water. Any swimmer sufficiently close to the finish such that removal from the water at the 2 1/2 hour mark would pose a risk to other swimmers near the finish and bathers near the beach shall be permitted to complete the swim, but they shall be listed as “disqualified” in the official swim results.

At the race conclusion, dock or anchor your boat and come to shore. Catered lunch, drinks, and gas money will be provided by the Safety Coordinator.

Specific Race Day Operations

- The primary roles are: (1) monitor for swimmers needing assistance, (2) communicate with the Safety Coordinator, and (3) prevent general boat traffic from entering the race course. The Police boat will be responsible for monitoring the perimeter of the race course.
- Boaters should be monitoring for swimmers in distress and for kayakers waving orange, man-in-the-water, flags indicating they have a swimmer needing assistance.
- The boaters will move with the race and each boat shall have a designated position within the groups of swimmers. The lead boat will monitor the leading one third of swimmers. The second boat will move along with the middle one third of swimmers. The third boat will be placed at the back of the race. One to three waver runners will also monitor swimmers.

- All boats need to maintain awareness of other support boats, wave runners, kayakers, swimmers and the police patrol boat.
- When ANY boat (power, sail, or paddle) not affiliated with the race approaches the racecourse in the middle of the lake, the nearest motorized boat should: (1) intercept the craft, (2) explain the event, and (3) request them to keep 300 yards away from the race course. **If a non-participant boat is in any way uncooperative, contact the police boat immediately. The police boat phone number will be written on index cards and provided to the boaters and wave-runners prior to the start of the race. If the motorized craft operator experiences difficulty reaching the police boat, contact the Safety Coordinator by phone and (s)he will relay the information to the police boat.**

SWIMMER RESCUE

General information:

- If a swimmer must be rescued for any reason, **notify the Safety Coordinator**. If the swimmer is experiencing a medical emergency boaters **MUST** call 911.
- Obtain swimmer's name, race number, and general condition. Give the information to the Safety Coordinator and to the race committee member on the police boat. Note the approximate location along the race course.

Rescue procedure:

When approached by or notified of a swimmer requiring rescue, the nearest boat will:

1. Idle the engine and remain perpendicular to the wave runner, kayaker, or swimmer.
2. Move towards the course edge and watch for other swimmers and kayakers in the water. Turn off the engine when the swimmer is within 20 feet of the boat.
3. Be careful not to enter the swim course and affect other swimmers.
4. Direct kayaker or swimmer out of the course and to the motorized boat.
5. **Non-medical emergency situations:**
 - a. A kayaker may notify the nearest power boat using an orange, man-in-the-water, flag to indicate that a swimmer

requires a non-medical rescue.

- b. If the area is congested with other swimmers, the kayaker will escort the swimmer outside the swim course, and wait for the motor boat to pick up the swimmer.
- c. Assist the swimmer onto the boat.
- d. The motor boat will keep the swimmer on board until docked at the race finish. If the boat needs to drop off swimmers at the race finish because there are too many swimmers on board, the boat will communicate this information to the nearest boat, and to the Safety Coordinator, informing them that they are moving from their assigned position. The boat will then transport swimmers to the finish and return to their designated position as quickly as possible.

6. Medical emergencies:

- a. Remove the swimmer from the water as rapidly as possible without causing injury. Initiate CPR if needed.
- b. Call 911.
- c. Transport swimmer to the West End beach immediately (unless instructed differently by 911) and the ambulance service will initiate further medical assistance.
- d. If a boater observes a swimmer who is unresponsive and going under water, note the location of the swimmer and call 911. Notify the emergency responder of your position on the lake and the condition of the swimmer, and that emergency medical assistance is required immediately.

6. After completing any rescue, Idle back to the assigned position along the course and notify the Safety Coordinator and race committee member on the police boat that the rescue is concluded and that the boat has returned to the designated position. Note that the swimmer has withdrawn, restate the swimmer's name, race number, condition, time of rescue, and reason swimmer was rescued. Please record this information in the provided notebook.

SWIMMER PATROL

Boaters and wave-runners will pull swimmers from the race to control the overall duration and safety of the event. Any swimmer expected to finish significantly later than the 11:00 am race end will also be pulled. **Decisions regarding the pulling of swimmers will be made by the Safety Coordinator and the race committee member on the police boat. Boaters and wave-runner operators will call the Safety Coordinator and the race committee member on the police boat to verify the need to pull and timing of pulling swimmers from the race.**

- If swimmers are not able to stay on course, they will be pulled from the race.
- Any swimmer that falls approximately 100-125 yards behind the second-to-last swimmer will be pulled from the race.
- Procedures for pulling swimmers should follow the instructions for non-medical emergencies.
- Swimmers pulled from the race will remain on the pickup boat until the end of the race unless the boat becomes too full with swimmers. The boat will then notify the nearest boat and the Safety Coordinator of the need to transport swimmers to the finish and will resume their designated position as soon as possible.
- Boaters will notify the Safety Coordinator of the swimmers name, race number and approximate time, and reason why they were pulled from the swim. Boaters will also record this information in the provided notebook.
- The official results will indicate DNF (Did Not Finish) for swimmers pulled from the race.

Swimmers abandoning the course:

- If a boater notes a swimmer heading toward the lake shore and clearly abandoning the race, notify the Safety Coordinator of the location and time. Attempt to get the swimmer's name and race number.
- If unable to obtain the name and race number of the swimmer, direct the nearest kayak to attempt to do so.
- Notify the Safety Coordinator if the swimmer cannot be identified.

Other Tasks and Information

Communications:

- Each boater must carry a charged cell phone. The phone number for each boat must be given to the Safety Coordinator prior to the event.
- All kayakers should also carry a cell phone. However, even with a phone, it may not be practical for a kayaker to call the Safety Coordinator for assistance. Kayakers will use orange, man-in-the-water, flags to signal for assistance for a swimmer.

KAYAK SAFETY**Kayak Requirements**

Kayakers should come equipped for 2 1/2 hours of slow paddling. The kayak used must be lake-worthy. Life jackets are required as is a cell phone but the other items are optional:

- Orange, man-in-the-water, flag. The Donner Lake Swim Committee has approximately 30 orange flags for volunteer kayakers to use if they do not have an orange flag. The flags will be distributed at the kayak meeting the morning of the event. Please be sure to return the flag to the Kayak Director or Safety Coordinator at the end of the swim on the West End Beach.
- Each kayaker must have a cell phone to communicate with the Safety Coordinator. The Safety Coordinator's phone number will be provided at the kayaker's meeting before the event begins. Please be sure the phone is charged.
- Bring an extra life jacket in case a swimmer rescue is required.
- Wear warm clothing that will wick and dry quickly. You should avoid wearing cotton.

Kayaker Role

Kayakers are expected to:

- (1) keep swimmers on course and in the middle of the lake,
- (2) watch for swimmers in distress, and
- (3) assist in transporting to a motorized boat swimmers who are withdrawing from the race or need rescue.

Day-of-Race Schedule for Kayakers

Kayaks can be unloaded at the race registration area near the Donner Memorial State Park entrance on Donner Pass Road. Follow parking rules on Donner Pass Road which include **no parking on the north side of the road**. Race volunteers can assist kayakers in unloading their kayaks and carrying them to the race start at the east end beach near the Tahoe Donner Beach Club. Please do not use the Tahoe Donner Beach Club parking lot or beach. Plan on arriving at approximately 7 am to allow plenty of time for parking and shuttling logistics. After unloading your kayak, it is best to park at the west end of the lake and return to the start by the race-provided shuttle bus. Parking at the east end of the lake is very limited.

All kayakers volunteering for the group swim are asked to park their kayaks on the north end of the beach, close to the Tahoe Donner Beach Club fence. Once you have placed your kayak, please check in with the Kayak Coordinator. If you park near the race start, we will have a shuttle service until 11:45 am to bring people back to the start so they can retrieve their car after the event.

Kayaker's Meeting

All kayakers must be ready to meet at 7:45 am. A 15 minute meeting will be conducted to review procedures for:

- Communication
- Swimmer rescue
- Course patrol
- Assignment of positions for each kayaker
- Race committee contact information

Kayakers will be divided into groups, assigned positions and should be in the water by 8:15 am, ready for an 8:30 am start.

During the Race

The kayakers are divided into three groups:

1. One group is responsible for patrolling the first one third of swimmers

at the lead of the race. Some will be positioned on the right (north side) and some on the left (south side) of the race course. The kayaks will be located at the perimeter of the race course to guide swimmers to stay in the middle of the lake.

2. The second group will be responsible for the middle one third of swimmers and will also be divided into right (north side) and left (south side) kayakers.
3. The last group is responsible for monitoring the last group of swimmers and will be divided into right (north side) and left (south side) kayakers. The Kayak Coordinator will follow the last swimmer.

Kayakers should observe the locations of other nearby kayaks in order to remain spread out and avoid crowding. The kayaks should form a perimeter to help swimmers navigate the course in the middle of the lake.

When kayakers near the finish area with their designated group of swimmers, they should circle back to assist with the next group of swimmers. **Please DO NOT** leave the race course until all swimmers have either completed the swim or have exceeded the cut-off time and have been removed from the water.

Course Policing

Kayakers observing a swimmer heading off course should shout at the swimmer to get their attention. Do not be shy about guiding the swimmer back on course. Do your best to not harm the swimmer in your attempt to redirect them.

Avoid following swimmers off the course unless necessary to redirect them back to the course in the middle of the lake. Do not paddle off course because the swimmers are off course. Communicate with the swimmer to bring them back on course. Swimmers will follow you. Be a good guide for the swimmers, encourage or lead errant swimmers to follow you back on course.

If swimmers are unable to navigate the course and continue to swim off course OR if a swimmer is falling behind and is more than 100 to 125 yards behind the second-to-last swimmer, contact the Safety

Coordinator or race committee member on the police boat regarding pulling the swimmer from the event.

If a swimmer wants to abandon the race, ask the swimmer to hold on to your kayak and signal for a motor boat or wave runner to pick up the swimmer. If possible, DO NOT allow a participant to swim to shore. If they insist, try to get their name and race number and then call the Safety Coordinator with the information.

Remember that you are watching all the swimmers in your area. **Do not follow one swimmer.** You are not a personal escort. Volunteer kayaks for the group swim cannot provide a personal escort due to the risk of jeopardizing all swimmers' safety.

Tired swimmers: (1) A rest is different than requiring help. Ask the swimmer if they need a rest or if they need help. (2) Allow swimmers to hang onto the bow, preferably, or stern, but not the sides of the kayak if a short rest is needed. If you find yourself doing this more than twice for the same swimmer, they probably need to be pulled and the kayaker should signal a motorized boat.

Swimmer rescue: (1) If a swimmer is panicking or appears in trouble, signal a motorized boat with an orange flag. Motor boats are allowed to enter the race course for pickup and transport in medical emergencies. (2) While waiting for assistance from a motor boat, quickly approach the swimmer, direct them to a motor boat if possible and toss a life jacket if available. (3) **Use caution!** A panicked swimmer can easily and quickly turn over a kayak. If a motor boat isn't immediately available, get the swimmer to the stern of the kayak and signal for a motor boat using the orange flag. If the area around the swimmer in trouble is crowded, move to the edge of the race course and assist with transfer to a motor boat or wave runner. (4) After delivering the swimmer to a motor boat or wave runner, return to your designated location on the swim course.

Communications:

- Bring a charged cell phone. The Safety Coordinator's phone number and the phone number of the race committee member on the police boat will be provided before the race begins.
- Orange, man-in-the-water, flags will be distributed during the kayaker's meeting. You will use the flag to draw the attention of a

motor boat or wave-runner.

SWIMMER RESPONSIBILITIES

The Donner Lake Swim's success requires swimmers to accept specific responsibilities. In addition to recognizing the risk inherent to swimming in cold water at significant elevation (e.g., heart attack, hypothermia, and drowning), every participant is expected to abide by the following:

Swimmers cannot require that volunteer kayakers for the group swim provide a swimmer with a personal escort. Swimmers are expected to follow the course in the middle of the lake with the help of adjacent swimmers and volunteer kayakers for the group swim. The kayakers will be positioned at the right and left perimeters of the course in the middle of the lake.

Do not swim in the area where motor boats are located. ***The boats are outside the race course.***

Keep an eye out for fellow swimmers. Help them stay on course. If you see another swimmer clearly in distress, alert a kayaker and stay in contact with the swimmer.

If you decide to abandon the event, notify a kayaker. The kayak will escort you to a motor boat. Please provide your name and race number so the Safety Coordinator can account for all swimmers.

If you are tired or injured and need assistance, request help from a kayaker by waving your hand.

1. When a kayak approaches, clearly explain the nature of your problem. Be accurate when assessing your condition or circumstance. Do not minimize or exaggerate your condition.
2. If you need a rest or simply want a break, look for a kayak and communicate your need to rest to them.
3. Listen to the directions provided by the kayaker or motor boat operator.
4. If you're injured or need medical attention, alert a kayaker who will provide a short term holding position while signalling a motor boat with an orange flag. The motor boat will transport you to the West End Beach. An ambulance service and medical tent are available at the

West End Beach. Swimmers will be pulled from the event if:

- (1) They are showing signs of distress,
- (2) They are demonstrating difficulty navigating the course, and
- (3) They are unlikely to finish the swim before the 2 ½ hour limit.

5. A swimmer that falls approximately 100 to 125 yards behind the second-to-last swimmer will be pulled from the race.

If you are pulled from the event, DO NOT argue with the kayaker or operator of the motor boat/wave runner. Your condition affects their ability to provide safety for all swimmers. You will either be picked up directly by a motor boat, or guided by a kayaker who will use an orange flag to signal a motor boat/wave runner to pick you up. If picked up by a motor boat, you will remain on the boat until the boat returns to the finish area. When you return to the finish area, you must check in with the Safety Coordinator and at the timing tent at the race finish. You must provide your name and race number. If you start the race but do not check in at the finish, we will assume you are still on the race course. At the conclusion of the race, if your name and race number have not been recorded, we will assume a Search and Rescue needs to be instituted. If injured but able to remain at the finish area, notify the Safety Coordinator.

EVENT CANCELLATION

Prior to the event start

- The Race Committee members and Safety Coordinator are responsible for determining and announcing event delay or cancellation.

During the event

- The Race Committee members and Safety Coordinator are responsible for determining and announcing event cancellation.
- The police boat and motor boats will be alerted by cell phone that the event has been cancelled.
- Motor boats will notify kayakers immediately. Kayakers will inform swimmers of cancellation.
- If able, swimmers should swim toward the north side of the lake (closest to Donner Pass Road). Swimmers needing assistance should wave

their hand to alert kayakers. Kayakers will then assist swimmers with a transfer to a motor boat. The shuttle service will be alerted and begin transporting swimmers from Donner Pass Road to the finish at the West End beach. All swimmers need to check in with the timing tent near the finish so that all swimmers can be accounted for.