

From: [Curt Davidson](#)
To: [Alekk Fullerton](#)
Subject: Alaska Excursions ATV Tour Permit
Date: Sunday, March 04, 2018 8:14:35 AM

To the Haines Assembly:

My name is Curt Davidson and I am writing in opposition to a permit being issued to Alaska Excursions (AE) to operate an ATV tour in the Haines Borough. AE's demonstrated attitude toward safety makes them unfit to be operating higher risk tours in a remote environment.

I am a former employee of AE for three summer seasons, the first as a zipline guide and the last two as the zipline manager. My top priority has always been the safety and well being of the guides and guests. I am speaking up because of my concern for both of these groups who would be involved in an ATV tour at a remote location operated by AE.

Safety has routinely been treated as a low priority and an afterthought by the company. First of all, guides placed in charge of guest safety typically receive very inadequate training. My first season, I was given only two days of training. This totaled about 16 hours of training in an industry where 40 hours is the accepted minimum to be put onto "probationary" status (which we called "shadowing"). My second season, I was similarly given only three days to train the guides before needing to send them out on their own with groups of guests. Giving mid-season new hires a one or two day training crash course before expecting them to lead tours was common practice. Full disclosure: my third season, I was given five full days at the beginning of the season to train the guides which did help immensely in adequately preparing them for their jobs.

Prior to being hired as the manager, I had received no training beyond that of a basic guide, and this was second-hand training (performed in-house by prior guides as opposed to industry professionals). Between my second and third seasons, I took it upon myself to attend Challenge Course Manager (CCM) Training with an Association of Challenge Course Technology (ACCT) professional vendor member. The assistant zipline manager and I had requested to upper management be sent to this training, but received no response. Full disclosure: AE did send me to the ACCT conference between my second and third seasons which helped in developing skills necessary to perform the job. I felt this was a good first step, but more was needed.

Attending CCM and the ACCT conference was eye opening. Every individual lesson they taught was focused on one major goal: building a culture of safety. A culture of safety is demonstrating through consistent policy and action a commitment to the safety of employees and guides. This must be demonstrated from the top down and be present in every action and consideration. This was all but absent at AE. Safety was rarely brought up and never addressed as a topic on its own. There was never a review of incidents or safety procedures, and safety was never addressed at meetings.

The zipline policy and procedures manual was inadequate to the point of being nearly useless. It was out of date, pieced together from other ziplines, and the material did not directly apply to AE's zipline. I told upper management that it needed to be updated (either by myself or a paid professional), and said I could work on it in the off-season. I received no support.

The emergency response plan was all but non-existent. There was no plan in writing and when I asked about it, I did not receive a clear answer. It was apparent to me the plan was "we'll figure it out if it happens." I tried to coordinate with the local Fire and EMS services to create a response plan but did not have enough time prior to the start of the tour season. I also never received any support or guidance from upper management. The impression I was left with was, "Do what you want, just don't spend too many hours on the clock working on it."

The tour schedule was often (at least every Tuesday, Wednesday, Thursday) extremely tight and overbooked. This led to the guides feeling pressured to rush guests through the course, which leads to small mistakes that have major consequences. Guests being sent early to the receiving guide when they aren't ready to brake for the guest, guests' gear being incorrectly connected to the cables, and guides clipping and unclipping their own safety tethers in the incorrect order, leaving them momentarily unclipped at height are just a few examples.

We were pressured to operate in all weather conditions. There was no policy in place to assess a safe range of wind speeds in which to operate. Though rare, lightning has been in the forecast and no policy is in place to stop operations in the event of nearby lightning.

AE never turned away guests that should not be participating in the zipline tour. The equipment has physical limitations and the manufacturer has maximum weight and body dimension recommendations for the gear used. The policy and procedures manual had nominal weight restrictions, but we were instructed to never turn away guests. We would often have guests that were obviously very much over the weight restrictions or their body dimensions prevented the gear from fitting correctly and safely. Both of these create a very precarious situation and put the guides in a very awkward and stressful spot.

All of these factors were ever present and collectively increased the overall risk of a major incident dramatically. I really felt like we were often on borrowed time, having avoided an incident so far. Knowing that we regularly came close to a major incident and had no training or plan in place to respond was a huge stress.

AE upper management cannot be trusted to “self police” their safety practices. If a permit is to be issued, I highly recommend having independent verification that the following conditions have been met:

- Written policy and procedures manual specific to AE's ATV tour that must contain, but is not limited to, the following:
 - Tour flow and procedures
 - Weather condition limitations (max wind speed, visibility, wave height, low temperature, etc.)
 - Allowable trail and terrain conditions on which the ATVs can be safely operated (according to the manufacturer's recommendation or following industry common practice)
 - Routine maintenance requirements for all equipment
 - Minimum acceptable condition of all equipment put into service (manufacturers will have these requirements)
 - Communications plan:
 - How primary and backup communications are handled between
 - Guides and the ATV tour camp at Glacier Point
 - Glacier Point Camp and Haines Emergency responders
 - Glacier Point ATV tour and AE Skagway office
 - Minimum functional communications required to safely conduct a tour
 - Minimum equipment and gear requirements to conduct tours
 - Minimum hours of training and necessary material for guides to escort guests on tour
 - Testing system to verify guide competency prior to giving tours
- Emergency Action Plan
 - The recommendations here are not an exhaustive list and this must be developed and coordinated with local emergency responders
 - Chain of command during an emergency
 - Who will be performing what role and what is the extent of each party's duties
 - Will the guides be required to safely transport the injured to the coast or airfield for evacuation? Or will local search and rescue or EMS extract the injured from the incident location?
 - Training for and response plan to the most likely life threatening incidents that would require immediate medical intervention by staff present and potentially the involvement of EMS. Examples: diabetic issues, severe allergic reaction to food or insect bites, severe injuries or bleeding.
 - Training for and response plan to the most likely non-life threatening incidents that would probably not require a response from local EMS. Examples: fainting, sprained joints, minor injuries
- Policy regarding and response plan to bear sightings and incidents
- The Policy and Procedures and Emergency Action Plans must be reviewed once per year by the guides and staff of the tour (including ATV guides, boat captains and their first mates) and upper management. Policy and Procedures manual review and new edition must be approved by the city of Haines. The Emergency Action Plan must be reviewed and approved by the staff above in as well as local emergency services (Fire Department, Search and Rescue and/or EMS).
- Written records of the following:

- o All training hours, topics covered, dates, who conducted the training, and signatures by trainer and trainee
- o Maintenance performed on all equipment, trails, structures, and vehicles
- o Daily communications check to ensure contact with emergency responders will function when needed
- o Periodic inventory and condition check of all emergency response equipment
- A way for employees to anonymously notify the city of Haines of violations of these conditions.

The list of recommendations above is not exhaustive. I highly recommend getting input from experienced guides and industry professionals. Adequate time must be provided to the personnel writing these materials as it must be thorough and independently reviewed prior to being implemented. Upper management must demonstrate a genuine care and concern for the safety and well being of all guides and guests involved by having a current written plan for all reasonably foreseeable incidents. As the assistant Intelligence Officer would say during my third combat tour in Iraq, "Hope' is not a course of action."

Those of us speaking up to voice our concerns are not just a few former employees with "an axe to grind," as quoted in the newspaper article. We care deeply about our coworkers, friends, every guest that visits, and the region. To us, the tourism industry is not just our personal cash cow. We would have liked to voice our concerns sooner. We are able to speak up now that we are no longer held in check by a company culture of intimidation or by the feeling that doing so would be risking our livelihood. I have witnessed many now-former employees who spoke up and demanded answers only to find that their services were no longer needed. The message was clear: get out of line and you're out.

This whole permit hearing has been a bit of a circus already and is an accurate reflection of the fly by the seat of your pants, devil-may-care, "I do what I want" modus operandi of the company. If Alaska Excursions is allowed to operate another tour unchecked in Haines, you can expect more of the same. Just be ready to pick up the pieces left behind.

Sincerely,

Curt Davidson